

1st June, 2023

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

2. Learned counsel for appellant made a request for adjournment in order to make preparation of the brief. Adjourned. To come up for arguments on 12.09.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar



(Salah-Ud-Din)
Member (J)



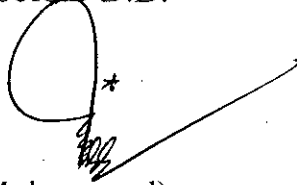
(Kalim Arshad Khan)
Chairman

**Mutazem Shah **

02.11.2022

Junior of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 26.12.2022 before D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

26.12.2022

Due to winter vacation, the case is adjourned to 29.03.2023 before the same.



Reader

29th Mar, 2023 : Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Mr. Shah Fahad, SI for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. To come up for arguments on 01.06.2023 before D.B. P.P given to the parties.



(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman

SCANNED
KP3T
Peshawar

14.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 06.06.2022 for the same as before.



Reader

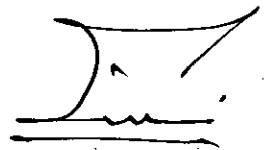
06.06.2022

Clerk of learned counsel for the appellant present. Mr. Wisal Khan, Head Constable alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 17.08.2022 before the D.B.



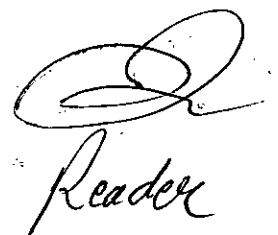
(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

17/08/2022

Due to summer vacation the case is adjourned to 02/11/2022 for the same



Reader

14.07.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. Subject to all legal and just objections, including limitation of departmental appeal, this appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of 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, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 02.12.2021 before the D.B.

Appellant Deposited Security & Process Fee

[Handwritten signature]
14/7/21

[Handwritten signature]
Chairman

2.12.21

*Prasanna D.B. au Tare, Messajeri
The case is adjourned to 14.02.22 for
further as per file.*

[Handwritten signature]
Member

06.12.22

~~Due to winter vacation, the case is adjourned to 28.03.2025 before the same.~~

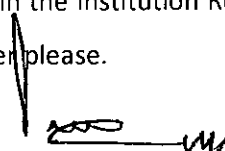

Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 5700 /2021

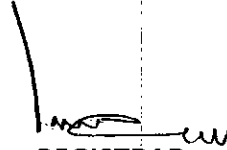
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/05/2021	<p>The appeal of Mr. Noor-ul-Habib resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	03/06/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/07/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Noor-ul-Habib Senior Clerk Office of Director Training School Swabi received today i.e. on 22.04.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Appeal has not been flagged/ marked with annexures' marks.
- 3- Copies of seniority lists mentioned in para-2, 3, 4 & 5 of the memo of appeal are not attached with the appeal which may be placed on it.
- 4- Copy of impugned seniority stood on 30.06.2020 mentioned in memo of appeal is not attached with the appeal which may be placed on it.
- 5- 45 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 772 /S.T,

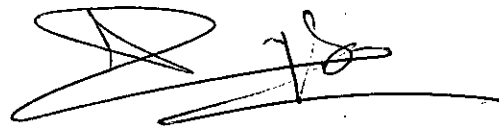
Dt. 05/05 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Adv. Pesh.

Mr,

Re-submitted after removing
the objections.



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 5700 /2021

Noor ul Habib

versus

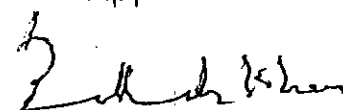
PPO & Another

I N D E X

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal		1-7
2.	Seniority List dated 31-12-2011	"A"	8-10
3.	Seniority List dated 31-12-2013	"B"	11-13
4.	Seniority List dated 01-06-2015	"C"	14-16
5.	Seniority List dated 31-12-2017	"D"	17-20
6.	Seniority List dated 21-10-2020 stood on 30-06-2020	"E"	21-24
7.	Representation dated 31-12-2020	"F"	25-28

Appellant

Through



Saadullah Khan Marwat
Advocate.

21-A, Nasir Mansion,
Shoba Bazaar, Peshawar
Ph: 0311-9266609

Dated: 12-04-2021

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. _____/2021

Noor ul Habib S/O Ghulam Habib,
Senior Clerk, Office of Director
Training School Swabi Appellant

Versus

1. **Provincial Police Officer,**
KP, Peshawar.
2. **Deputy Inspector General**
Of Police, Hqr: KP, Peshawar.
3. Muhammad Shafiq,
Asst: Grade Clerk, Office of
SP FRP, Bannu Range Bannu.
4. Gul Said, Senior Clerk,
Office of DPO Karak.
5. Akhtar Hussain-I,
Asst: Grade Clerk,
RPO Office, D. I. Khan.
6. Farmanullah, Asst: Grade
Clerk, Central Police Office,
KP, Peshawar.
7. Abdul Karim, Asst: Grade Clerk,
Office of AIG, Bomb Disposable
Unit, Peshawar.
8. Ibrar Hussain, Senior Clerk,
Capital City Police Office,
Peshawar.

9. Sharafatullah, Senior Clerk,
Investigation Unit, Central
Police Office, KP, Peshawar.
10. Gohar Ali, Asst: Grade Clerk,
DPO Office Mardan.
11. Shoaib, Senior Clerk,
Central Police Office,
KP, Peshawar.
12. Muhammad Abid-1,
Senior Clerk, FRP Office,
Kohat Range Kohat.
13. Muhammad Bilal-1,
Asst: Grade Clerk, Office of
Regional Police Officer, Kohat.
14. Ghaffar Ali, Asst: Grade Clerk,
RPO Office Kohat.
15. Imdad Hussain Shah,
Senior Clerk, Central Police
Office, KP, Peshawar.
16. Muhammad Saeed,
Asst: Grade Clerk,
RPO Office Mardan.
17. Hussain Habib,
Asst: Grade Clerk,
Office of Commandant
Elite, KP, Peshawar.
18. Muhammad Farman Ali,
Asst: Grade Clerk,
Office of FRP Hqr: Peshawar.

19. Fazal Khaliq, Asst: Grade Clerk,
Office of SP Investigation Chitral.
20. Ajmal Khan, Senior Clerk,
Capital City Police Office,
Peshawar.
21. Shah Zaman-1, Asst: Grade Clerk,
RPO Office Kohat.
22. Muhammad Younis, Senior Clerk,
DPO Office, Lakki Marwat.
23. Zakria Khan, Senior Clerk,
DPO Office, Nowshera.
24. Akhtar Hussain-II, Asst: Grade Clerk,
DPO Office Lower Chitral.
25. Raj Malook, Senior Clerk,
DPO Office, Bunir.
26. Noor-ul-Arifeen, Senior Clerk,
DPO Office Bunir.
27. Ijaz Khan, Asst: Grade Clerk,
DPO Office, District Batagram.
28. Esa Khan, Asst: Grade Clerk,
DPO Office Dir Lower.
29. Gul Karim, Senior Clerk,
Central Police Office, KP,
Peshawar.
30. Shahid Mehmood, Senior Clerk,
Office of RPO Kohat Range Kohat.
31. Dost Muhammad, Senior Clerk,
In the office of Regional Police
Officer, Kohat Range.

32. Ikram-UI-Haq, Senior Clerk,
NACTA Islamabad (on deputation).
33. Shah Iran, Senior Clerk,
Central Police Office, KP, Peshawar.
34. Rashid Mehmood, Senior Clerk,
Capital City Police Office Peshawar.
35. Badshah Din, Senior Clerk,
Office of District Police Officer,
Hangu.
36. Sherin Badshah, Senior Clerk,
Office of SP Investigation,
Bannu.
37. Mir Muhammad, Senior Clerk,
Office of the Regional Police Officer,
Bannu.
38. Javed Khan-1, Office of the
District Police Officer, Mardan.
39. Arshad, Senior Clerk, Office of
RFSL, Swat.
40. Saifullah Khan, Senior Clerk,
Office of SP Investigation,
Lakki Marwat.
41. Hakim Khan, Senior Clerk,
Office of District Police Officer,
Tank.

42. Khan Bahadar, Senior Clerk,
Office of SP Investigation,
Karak.

43. Abdul Malik, Senior Clerk,
Office of District Police Officer,

Bannu Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST REVISED SENIORITY LIST OF SENIOR
CLERKS STOOD ON 30-06-2020 OF R. NO. 01
CIRCULATED ON 21-10-2020 WHEREBY APPELLANT
BEING MOST SENIOR WAS NOT PLACED AT PROPER
PLACE AND DEPARTMENTAL APPEAL DATED 31-12-
2020 WAS NOT HONORED:

Filed to-day
Registrar

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth;

1. That appellant was initially appointed as Junior Clerk on 20-06-1993 and was promoted to the post of Senior Clerk on 02-12-2009.
2. That on 31-12-2011, R. No. 01 circulated Seniority List of Senior Clerks whereby name of appellant was placed at S. No. 254 and this seniority list was quite per the mandate of law. (Copy as annex "A")
3. That on 31-12-2013, subsequent seniority list was circulated by the said authority, wherein appellant was placed at S. No. 166 and an incumbent at S. No. 10 was assigned revised seniority list but before the column, the same was written as 11-12-2012. Similarly incumbent at S. No. 45, 50, 88, 133, 140, 150, 154, 155, 161, were treated alike. (Copy as annex "B")

4. That on 01-06-2015, another seniority list of Senior Clerks was circulated and the aforesaid incumbents was assigned the aforesaid positions. (Copy as annex "C")
5. That on 31-12-2017, another seniority list was circulated vide covering letter dated 09-04-2018 with the aforesaid positions. (Copy as annex "D")
6. That seniority list dated 30-06-2020 was finally circulated on 21-10-2020 Senior Clerks B-14 which was later on uploaded on website with the aforesaid positions which was represented vide application dated 31-12-2020 with covering letter dated 04-01-2021 wherein appellant was placed at S. No. 84 and the aforesaid juniors were placed above his name but the same also met dead response till date. (Copies as annex "E" & "F")

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

GROUND S:

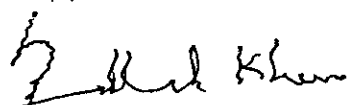
- a. That appellant was initially appointed on 20-06-1993 as Junior Clerk and was promoted to the post of Senior Clerk on 02-12-2009.
- b. That private respondents were appointed prior, however they were promoted to the post of Senior Clerks in the year 2012, 2013, 2015, 2019, etc, so they became junior to appellant in cadre, grade and post.
- c. That seniority is to be reckoned from grade to grade, post to post and cadre to cadre, so it is crystal clear that appellant was promoted to the post of Senior Clerk on 02-12-2009, while the contesting respondents in the year 2012, 2013, 2015 and 2019.
- d. That every seniority list gives fresh cause of action to an aggrieved person and it is to state that earlier seniority lists were not circulated amongst the incumbents.
- e. That as and when seniority position is required to change, then the position will be brought up into the notice of the changed positions but in the case, no notice was given to appellant, so the said seniority lists have no binding effect upon the position of appellant.

- f. That even in all the seniority lists, it was admitted by the authority that they were given revised seniority but appellant was never associated with the same and the change was made in the office of the official respondents for ulterior motive.
- g. That the change was made with consideration basis, so is not per the mandate of law.

It is, therefore, most humbly prayed that on acceptance of the appeal, seniority list dated 21-10-2020 stood on 30-06-2020 be set aside and seniority list of 31-12-2011 be restored as such and the name of appellant be placed at proper place above the names of private respondents in the said Seniority List dated 30-06-2020, or as the case may be, with all service benefits and relief.


Appellant

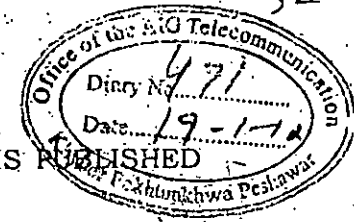
Through


Saadullah Khan Marwat


Arbab Saiful Kamal


Anjad Nawaz
Advocates.

Dated 12-04-2021



SENIORITY LIST OF SENIOR CLERKS AS IT STOOD ON 31-12-2011

NO. 919 /E-III, THE SENIORITY LIST OF SENIOR CLERKS: - THE SENIORITY LIST OF SENIOR CLERKS IS PUBLISHED FOR INFORMATION OF ALL CONCERNED.

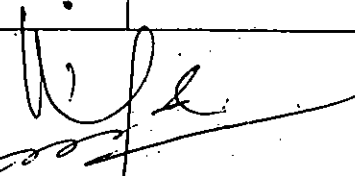
S.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlis:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
1 ✓	Javed Iqbal	Peshawar	10 th	20.02.52	19.02.74	09.08.81	01.12.90	In 2009 DPC meeting he was superseded because he has forgone his promotion for ever.
2 ✓	Abdul Hafiz	Peshawar	10 th	01.01.53	04.04.75	05.01.84	01.12.90	
3	Khair Muhaimmad	Bannu	10 th	09.11.54	05.02.76	04.12.86	01.02.92	Promotion foregone for ever vide DIG/Bannu letter No. 2643/ES dated: 28.09.98.
4 ✓	Hastam Khan	Peshawar	10 th	24.03.60	25.9.78	5.9.88	16.197	
5	Aziz Ullah SP/Tele	Bannu	10 th	01.10.57	19.5.80	6.12.88	5.8.98	
6	Qamar Zaman SP/MT Dy Dir/Tech	Bannu	BA	05.02.56	30.9.80	27.3.90	25.2.2000	
7	Akbar Ali DSP/MT DSP/Tele	Swat	10 th	9.2.63	17.1.82	17.7.99	22.1.2001	
8	Aftab-ud-Din OS/Tele Acctt. Tele	Mardan	FA	20.4.56	3.2.82	17.7.90	2.2.2001	
9	Bakhat Afsar SRC/Tele	Swat	10 th	1.2.58	20.4.81	16.2.91		
10 ✓	Gul Faraz OASI/Tele Head Clerk Tele	Mardan	10 th	4.10.54	7.4.76	11.7.91		
11 ✓	Jehangir Khan ACR/Clerk Tele GSI/Tele	A. Abad.	10 th	15.4.62	1.1.78 Chowkidar 5.8.80 JC	11.7.91		Superseded in DPC 2009.
12	Abdul Ahad	Chitral	BA	2.4.59	1.9.78	12.8.91		
13	Muzafar Iqbal AIG Tele	Peshawar	10 th	16.02.60	01.08.74 FC	15.10.91		re-instate in service 31.12.2009

A 8

[Handwritten signature]

S.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlis:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
250.	Muhammad Shahid	Peshawar	10th	04.04.70	13.12.92	02.12.2009		
251.	Muhammad Zaheer	Abbottabad	10th	07.05.71	28.04.91 FC 23.01.92 JC	02.12.2009		
252.	Mustansar ur Rehman	Peshawar	FA	20.10.70	01.04.93	02.12.2009		
253.	Akhtar Abbas Shah	DIKhan	10th	15.12.71	08.04.93	02.12.2009		
254.	Noor ul Habib	Swabi	BA	12.08.74	20.06.93	02.12.2009		
255.	Muhammad Aslam	Mansehra	B.Sc	20.06.72	19.07.93	02.12.2009		
256.	Ashfaq Ahmad Shah	Peshawar	BA	27.07.73	20.07.93	02.12.2009		
257.	Muhammad Liaqat	Mansehra	10th	09.03.73	01.04.94	02.12.2009		
258.	Shah Zaman	Kohistan	10th	15.03.73	09.01.94	02.12.2009		
259.	Bakht Zada	Malakand Agency	10th	15.02.71	10.05.94	02.12.2009		
260.	Muhammad Bashir	Mansehra	10th	16.02.72	13.07.94	02.12.2009		
261.	Samiullah	Malakand Agency	D.Com	01.02.69	31.07.94	02.12.2009		
262.	Afiab Nabi	Haripur	10th	15.01.74	21.08.94	02.12.2009		
263.	Hazrat Yousaf	Batagram	FA	01.03.68	23.08.94	02.12.2009		
264.	Zahid Ali	Charsadda	FA	14.07.76	10.10.94	02.12.2009		
265.	Karim Khan	Peshawar	MA	29.03.71	20.11.94	02.12.2009		
266.	Amir Azeem	Peshawar	10th	15.05.73	20.11.94	02.12.2009		
267.	Rab Nawaz	Peshawar	BA	04.03.72	24.11.94	02.12.2009		
268.	Hidayat ur Rehman	Peshawar	MA	12.10.67	29.11.94	02.12.2009		
269.	Shoukat Ali	Peshawar	10th	22.08.67	05.12.94	02.12.2009		
270.	Muhammad Younis	DIKhan	FA	23.04.68	18.05.88 N/Qasid 06.12.94 JC	02.12.2009		

S.No.	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF Enlis:	DATE OF PROMOTION AS S. Clerk	DATE OF PROMOTION AS SELECTION GRADE	REMARKS
313.	Yasir Iqbal	Nowshera	10th	06.01.79	25.01.99 as daftari 05.10.2001 as a J/C	02.12.2009		
314.	Muhammad Irshad	Peshawar	FA	15.07.1979	16.07.98 as N/Qasid 06.10.2001 as a J/C	02.12.2009		
315.	Murad Ali	Charsadda	10th	15.02.75	10.02.96 as a C/VI 08.10.2001 as a J/C	02.12.2009		
316.	Muhammad Rehan	DIKhan	BA	01.04.75	05.04.93 as a N/Qasid 08.10.2001 as J/C	02.12.2009		
317.	Rajab Ali	DIKhan	10th	01.01.76	10.04.96 as a N/Qasid 08.10.2001 as a J/C	02.12.2009		
318.	Muhammad Riaz	Peshawar	BA	15.04.74	25.02.96 as a C/VI 09.02.2001 as J/C	02.12.2009		


(KHALID MASOOD)
 Addl: IGP/Headquarters,
 For Provincial Police Officer,
 Khyber Pakhtunkhwa
 Peshawar.

No. 920-40 E/III, dated Peshawar, the 17/10/2012.

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

- | | |
|---|---|
| 1. Addl: IsGP /Investigation & Special Branch, Khyber Pakhtunkhwa | 2. Capital City Police Officer Peshawar. |
| 3. All Regions DisG in Khyber Pakhtunkhwa | 4. DIG DCT Special Branch, Khyber Pakhtunkhwa, Peshawar |
| 5. Commandants FRP & PTC Hangu, | 6. AIG Traffic Khyber Pakhtunkhwa Peshawar |
| 7. Registrar CPO.
All Branches of CPO, Peshawar. | 8. Supdt: Establishment CPO.
PA to IGP Khyber Pakhtunkhwa, Peshawar. |

They are requested to please inform all officers serving under their command. Any officer who have objection on his seniority, he should submit his representation within one month after the issue of the list otherwise no representation will be accepted.

SENIORITY LIST OF SENIOR CLERKS AS IT STOOD ON 31.12.2013

NO. 263 /E-V, The seniority list of Senior Clerks: - The seniority list of Senior Clerks is published for information of all concerned.

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
1. ✓	Khair Muhammad	Bannu	10 th	09.11.54 ✓	05.02.76	04.12.86	Promotion forgone for ever vide DIG/Bannu letter No. 2643/ES dated 28.09.98
2. ✓	Qamar Zaman	Bannu	BA	05.02.56	30.9.80	27.3.90	
3. ✓	Akbar Ali	Swat	10 th	9.2.63	17.1.82	17.7.90	
4. ✓	Bakhat Afsar	Swat	10 th	1.2.58	20.4.81	16.2.91	
5. ✓	Gul Faraz	Mardan	10 th	4.10.54 ✓	7.4.76	11.7.91	
6. ✓	Muzafar Iqbal	Peshawar	10 th	16.02.60	01.08.74 FC 01.05.79 JC	15.10.91	Re-instate in service 31.12.2009
7. ✓	Alam Khan	Swat	BA	2.2.56	1.6.80	01.3.92	
8. ✓	Haibat Khan	Bannu	FA	30.09.63	19.8.82	16.8.92	
9. ✓	Muhammad Yousaf	A. Abad	10 th	25.12.62	28.11.83	22.8.93	
10. ✓	Muhammad Saleem ①	Peshawar	10 th	10.09.64	08.11.82	11.12.2012	Assigned revised seniority vide Order No. 19192-93/E-III dated: 06.08.2013
11. ✓	Muhammad Sultan	Manshara	10 th	25.5.55 ✓	24.4.77 NQ 14.12.83 JC	22.8.93	
12. ✓	Sana Ullah	Charsadda	BA	11.3.63	18.4.86	25.4.94	
13. ✓	Hidayatullah	Charsadda	F.A	21.10.66	11.01.87	03.01.96	
14. ✓	Zar Badshah	Peshawar	10 th	02.11.64	15.02.87	03.01.96	
15. ✓	Muhammad Jamshid	Peshawar	B.A	10.04.61	09.04.86	10.12.96	

Important Backup Chartered Seniority Lists Update Seniority of ministerial staff 2014 seniority list of senior clerks 31.12.2013 vides

[Signature]
EV
11-3-14

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
149.	Abdur Rauf	DIKhan	10th	10.02.67	23.08.92	02.12.2009	
150.	Arshad (11)	Swat	F.A	12.02.66	25.08.92	11.12.2012	Assigned revise seniority with his colleague order No. 6902-04/E-III, dated: 21.03.20
151.	Habib ur Rehman	DIKhan	FA	16.04.66	27.08.92	02.12.2009	
152.	Abdul Qayum	DIKhan	D.Com	12.08.69	27.08.92	02.12.2009	
153.	Muhammad Ismail	DIKhan	10th	23.08.74	29.08.92	02.12.2009	
154.	Haibat Khan (12)	Tank	F.A	03.05.69	01.09.92	11.12.2012	Assigned revise seniority with his colleague order No. 6890-92/E-III, dated: 21.03.20
155.	Hakim Khan (13)	Tank	10 th	06.02.73	01.09.92	11.12.2012	Assigned revise seniority with his colleague order No. 5553-56/E-III, dated: 06.03.20
156.	Asad Khan	Nowshera	BA	20.08.67	01.10.92	02.12.2009	
157.	Niamatullah	Lakki	FA	04.10.74	06.10.92	02.12.2009	
158.	Muhammad Umar (14)	Dir	10th	15.05.55 ✓	17.10.92	02.12.2009	His previous order vide No. 29614-36/E-III 09.12.2009 shall stand.
159.	Khalid Mehmood	Charsadda	10th	01.07.71	19.10.92	02.12.2009	
160.	Fazal Rahim	Tank	FA	01.05.69	12.11.92	02.12.2009	
161.	Abdul Matik (15)	Tank	F.A	19.04.67	12.11.92	11.12.2012	Assigned revise seniority with his colleague order No. 5557-60/E-III, dated: 06.03.20
162.	Muhammad Shahid	Peshawar	10th	04.04.70	13.12.92	02.12.2009	
163.	Muhammad Zaheer	Abbottabad	10th	07.05.71	28.04.91 FC 23.12.92 JC	02.12.2009	
164.	Mustansar ur Rehman	Peshawar	FA	20.10.70	01.04.93	02.12.2009	
165.	Akhtar Abbas Shah	DIKhan	10th	15.12.71	08.04.93	02.12.2009	
166.	Noor ul Habib	Swabi	BA	12.08.74	20.06.93	02.12.2009	
167.	Muhammad Aslam	Mansehra	B.Sc	20.06.72	19.07.93	02.12.2009	
168.	Ashfaq Ahmad Shah	Peshawar	BA	27.07.73	20.07.93	02.12.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
35. ✓	Sajjad Hussain	Peshawar	10th	24.04.68	03.02.88	16.01.2008	
36. ✓	Muhammad Zahir	Charsadda	BA	16.05.59	04.02.88	16.01.2008	
37. ✓	Amir ur Rehman	Dir	10th	22.04.65	24.02.88	16.01.2008	
38. ✓	Ubaid ur Rehman-I	Chitral	FA	09.09.67	05.03.88	16.01.2008	
39. ✓	Shah Farooq	Kohat	BA	01.03.67	07.03.88	16.01.2008	
40. ✓	Jatal ud Din	Malakand Agency	10th	21.02.66	21.03.84 FC 24.04.88 JC	16.01.2008	
41. ✓	Ubaid ur Rehman - II	Charsadda	FA	14.09.64	31.03.88	16.01.2008	
42. ✓	Gul Nawaz	Bannu	10th	03.03.70	15.08.88	16.01.2008	
43. ✓	Muhammad Pervez - II	Swat	10th	05.02.66	01.02.87 Daftari 03.09.88 JC	16.01.2008	
44. ✓	Maqbal Khan	Peshawar	FA	03.04.64	07.09.88	16.01.2008	
45. ✓	Ihsanullah (4)	Charsadda	10 th	11.05.67	19.09.88	11.12.2012	Assigned revised seniority No. 15592-94/E-III dated
46. ✓	Javed Ali	Charsadda	FA	16.09.68	19.09.88	16.01.2008	
47. ✓	Inamullah	Bannu	FA	12.04.69	25.09.88	16.01.2008	
48. ✓	Abdul Aziz	Swat	10 th	10.08.60	01.08.82 Class-IV 01.10.88 JC	16.01.2008	
49. ✓	Muqrab Alam Khan	Mardan	10th	07.10.70	08.10.88	16.01.2008	
50. ✓	Abdur Rauf (5)	Lakki	10 th	14.02.70	18.12.88	11.12.2012	Assigned revised seniority Order No. 17297-99/19.07.201
51. ✓	Tahseen Ullah	Charsadda	F.A	10.01.65	03.07.89	16.01.2008	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
70. ✓	Muhammad Yousaf	Peshawar	10th	01.04.61	30.09.87	02.12.2009	
71. ✓	Muhammad Ishtiaq	Abbottabad	10th	12.01.67	06.03.88	05.06.2009	
72. ✓	Sardar Alam	Charsadda	FA	02.10.63	02.05.88	05.06.2009	
73. ✓	Sikandar Khan	Kohat	BA	04.04.64	01.08.88	08.08.2009	
74. ✓	Zahid Ullah	Peshawar	10th	04.03.69	01.08.88	08.08.2009	
75. ✓	Abdul Hakim	Swabi	FA	28.10.63	16.08.88	05.06.2009	
76. ✓	Muhammad Nasir (6)	Kohat	BA	11.11.70	07.12.88	05.06.2009	Assigned revised seniority vide 50/E-III dated: 29.01.2013
77. ✓	Nadeem Ahmad	Mansehra	10th	11.04.71	05.07.89	02.12.2009	
78. ✓	Jehanzeb Haideri	Peshawar	BA	04.06.65	11.10.89	05.06.2009	
79. ✓	Muhammad Riaz	Peshawar	10 th	08.09.68	08.08.88	05.06.2009	
80. ✓	Inayat Ullah	Malakand Agency	D.Com	10.04.67	11.10.89	06.05.2009	
81. ✓	Sibghatullah	Bannu	10 th	08.05.64	30.10.89	02.12.2009	
82. ✓	Alamzeb	Mansehra	10 th	11.09.67	16.01.90	05.06.2009	
83. ✓	Muhammad Bashir	Mansehra	10 th	02.01.71	16.06.90	05.06.2009	
84. ✓	Muhammad Irshad	Mansehra	FA	13.04.71	10.07.90	08.08.2009	
85. ✓	Farmaqullah	Peshawar	10 th	02.04.66	14.07.90	08.08.2009	
86. ✓	Minhaj ud Din	Peshawar	10 th	14.07.67	06.09.88 N/Qasid 14.07.90 J/C	06.05.2009	
87. ✓	Ali Asghar	Nowshera	MA	09.01.70	14.07.90	05.06.2009	
88. ✓	Israr Ali (7)	Peshawar	10 th	03.03.72	14.07.90	22.07.2013	Assigned revised seniority vide 29187-88/E-III dated:
89. ✓	Abdul Wadood	Charsadda	10 th	19.11.65	15.07.90	05.06.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
129.	Hafeez Ullah	Kohat	10th	10.10.72	21.10.91	08.08.2009	
130.	Hamidullah Jan	Khyber Agency	10th	02.02.68	22.10.91	08.08.2009	
131.	Javed Iqbal	Peshawar	10th	11.04.73	22.10.91	08.08.2009	
132.	Shahid Ali	Peshawar	10th	01.04.72	01.11.91	02.12.2009	
133.	Nadeemullah (9)	Peshawar	C.Com	24.06.70	19.11.91	11.12.2012	Assigned revise seniority with his colleague order No. 5569-71/E-III, dated: 06.03.2012
134.	Khaista Gul	Peshawar	10th	09.01.67	02.12.91	08.08.2009	
135.	Sardar Ali	Swat	10th	15.03.71	12.12.91	08.08.2009	
136.	Waheed uz Zamar	Karak	10th	21.02.71	08.02.92	08.08.2009	
137.	Shah Nawaz	Kohat	FA	12.02.69	17.02.92	08.08.2009	
138.	Sahar Gul	Peshawar	10th	12.04.73	24.02.92	08.08.2009	
139.	Umar Zada	Dir	10th	18.05.72	07.03.92	08.08.2009	
140.	Badshah Din (10)	Bannu	F.A	01.04.72	16.03.92	11.12.2012	Assigned revise seniority with his colleague order No. 6560-63/E-III, dated: 18.03.2012
141.	Azim Khan	Peshawar	10th	12.02.65	22.03.92	08.08.2009	
142.	Irfanullah	DIKhan	FA	06.10.70	07.07.92	02.12.2009	
143.	Attaullah	Peshawar	FA	10.04.71	17.08.92	02.12.2009	
144.	Gul Aslam	Lakki Marwat	FA	10.08.66	19.08.92	02.12.2009	
145.	Tahir Javed	Peshawar	BA	12.10.66	19.08.92	02.12.2009	
146.	Azizul Haq	Charsadda	FA	05.03.67	19.08.92	02.12.2009	
147.	Jamil Ahmad	DIKhan	D.Com	25.12.71	19.08.92	02.12.2009	
148.	Yousaf Khan	Peshawar	FA	01.07.69	22.08.92	02.12.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
149.	Abdur Rauf	DIKhan	10th	10.02.67	23.08.92	02.12.2009	
150.	Arshad (11)	Swat	F.A	12.02.66	25.08.92	11.12.2012	Assigned revise seniority with his colleague order No. 6902-04/E-III, dated: 21.03.20
151.	Habib ur Rehman	DIKhan	FA	16.04.66	27.08.92	02.12.2009	
152.	Abdul Qayum	DIKhan	D.Com	12.08.69	27.08.92	02.12.2009	
153.	Muhammad Ismail	DIKhan	10th	23.08.74	29.08.92	02.12.2009	
154.	Haibat Khan (12)	Tank	F.A	03.05.69	01.09.92	11.12.2012	Assigned revise seniority with his colleague order No. 6890-92/E-III, dated: 21.03.20
155.	Hakim Khan (13)	Tank	10 th	06.02.73	01.09.92	11.12.2012	Assigned revise seniority with his colleague order No. 5553-56/E-III, dated: 06.03.20
156.	Asad Khan	Nowshera	BA	20.08.67	01.10.92	02.12.2009	
157.	Niamatullah	Lakki	FA	04.10.74	06.10.92	02.12.2009	
158.	Muhammad Umar (14)	Dir	10th	15.05.55 ✓	17.10.92	02.12.2009	His previous order vide No. 29614-36/E-III 09.12.2009 shall stand.
159.	Khalid Mehmood	Charsadda	10th	01.07.71	19.10.92	02.12.2009	
160.	Fazal Rahim	Tank	FA	01.05.69	12.11.92	02.12.2009	
161.	Abdul Malik (15)	Tank	F.A	19.04.67	12.11.92	11.12.2012	Assigned revise seniority with his colleague order No. 5557-60/E-III, dated: 06.03.20
162.	Muhammad Shahid	Peshawar	10th	04.04.70	13.12.92	02.12.2009	
163.	Muhammad Zaheer	Abbottabad	10th	07.05.71	28.04.91 FC 23.12.92 JC	02.12.2009	
164.	Mustarisar ur Rehman	Peshawar	FA	20.10.70	01.04.93	02.12.2009	
165.	Akhtar Abbas Shah	DIKhan	10th	15.12.71	08.04.93	02.12.2009	
166.	Noor ul Habib	Swabi	BA	12.08.74	20.06.93	02.12.2009	
167.	Muhammad Aslam	Mansehra	B.Sc	20.06.72	19.07.93	02.12.2009	
168.	Ashfaq Ahmad Shah	Peshawar	BA	27.07.73	20.07.93	02.12.2009	

S/No	Name	Home Distt:	EDU: QUAL:	DATE OF Birth	DATE OF ENLISTMENT	DATE OF PROMOTION AS S. Clerk	REMARKS
351.	Saif ud Din	Kohat	F.Sc	10.08.1984	12.06.2009	22.07.2013	
352.	Farman Ali	Shangla	F.A	11.03.1987	12.06.2009	22.07.2013	
353.	Muhammad Nawaz	Dir Upper	BA	08.03.1971	12.06.2009	22.07.2013	
354.	Muhammad Haroon	DIKhan	10 th	27.07.1990	12.06.2009	22.07.2013	
355.	Kifayat Ullah	Bannu	FA	14.03.1988	12.06.2009	22.07.2013	
356.	Muhammad Shoaib	Lakki	B.Sc (Hounrs)	05.04.1988	12.06.2009	22.07.2013	
357.	Jalal ud Din	Lakki	FA	22.02.1984	12.06.2009	22.07.2013	
358.	Irfanullah	Lakki	F.Sc	08.04.1989	12.06.2009	22.07.2013	
359.	Farooq Shah	Charsadda	MA	07.04.1985	12.06.2009	22.07.2013	

(MIAN MUHAMMAD ASIF)
 Addl: IGP/Headquarters
 For Provincial Police Officer,
 Khyber Pakhtunkhwa
 Peshawar

No. 264-99 E/V, dated Peshawar, the 11/13 /2014.

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

1. All Addl: IsGP In Khyber Pakhtunkhwa
2. All Regions DisG in Khyber Pakhtunkhwa
3. Capital City Police Officer Peshawar
4. DisG CTD, Traffic & Telecommunication, Khyber Pakhtunkhwa Peshawar
5. Commandants PTC Hangu,
6. Registrar CPO
7. Office Supdt: Secret CPO

They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority, he must submit his representation within one week after the issuance of the list, otherwise no representation will be entertained.

SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 01.06.2015


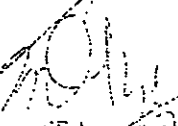
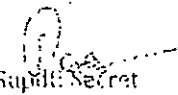
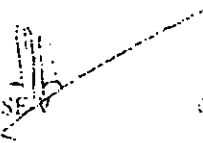
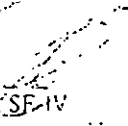
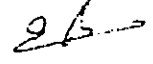

No. 4121

The seniority list of Senior Clerks: The seniority list of Senior Clerks is published for information of all concerned.

3164
23-6-15

S/NO	NAME	DATE OF BIRTH	DOMICILE	EDUC. QUAL.	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	DATE OF RETIREMENT	REMARKS
1.	Qamar Zaman	05.02.56	Bannu	BA	30.9.80	27.3.90	04.02.2016	
2.	Albar Ali ✓	9.2.63	Swat	10 th	17.1.82	17.7.90	08.02.2023	
3.	Atam Khan	2.2.56	Swat	BA	1.6.60	01.3.92	01.02.2016	
4.	Habib Khan ✓	30.09.63	Bannu	FA	19.8.82	16.8.92	31.09.2023	
5.	Muhammad Yousaf	25.12.62	A. Abad	10 th	28.11.83	22.8.93	24.12.2022	
6.	Sana Ullah	11.3.63	Charsadda	BA	18.4.86	25.4.94	10.03.2023	
7.	Abdul Wadood	09.03.60	Chitral	10 th	19.03.80	16.11.98	08.03.2020	
8.	Ali Murad ✓	15.01.59	Chitral	F.A	14.09.87	16.11.98	14.01.2019	
9.	Zahirullah	10.05.61	Charsadda	10 th	20.12.81	17.12.99	09.05.2021	
10.	Muhammad Riaz ✓	02.07.62	Peshawar	B.A	20.10.87	17.12.99	01.07.2023	
11.	Noor Muhammad ✓	01.08.55	Malakand	10 th	07.11.87	16.01.2008	31.07.2015	
12.	Taj Muhammad	06.09.69	Mardan	FA	17.02.83	16.01.2008	05.09.2029	

C 14

 Registrar
  SE-I
  Supdt. Secret
  SE-V
  SE-IV
  OS. CP
 

Handwritten signature

	NAME	DATE OF BIRTH	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	DATE OF RETIREMENT	REMARKS
131.	Asad Khan	20.08.67	Nowshera	BA	01.10.92	02.12.2009	19.08.2027	
132.	Niamatullah	04.10.74	Lakki	FA	06.10.92	02.12.2009	03.10.2034	
133.	Khalid Mehmood	01.07.71	Charsadda	10th	19.10.92	02.12.2009	30.06.2031	
134.	Fazal Rahim	01.05.69	Tank	FA	12.11.92	02.12.2009	30.04.2029	
135.	Abdul Malik	19.04.67	Tank	FA	12.11.92	11.12.2012	18.04.2027	
136.	Muhammad Shahid	04.04.70	Peshawar	10th	13.12.92	02.12.2009	03.04.2030	
137.	Muhammad Zaheer	07.05.71	Abbottabad	10th	28.04.91 FC 23.12.92 JC	02.12.2009	06.05.2031	
138.	Mustansar ur Rehman	20.10.70	Peshawar	FA	01.04.93	02.12.2009	19.10.2030	
139.	Akhtar Abbas Shah	15.12.71	DIKhan	10th	08.04.93	02.12.2009	14.12.2031	
140.	Noor ul Habib	12.08.74	Swabi	BA	20.06.93	02.12.2009	11.08.2024	
141.	Muhammad Aslam	20.06.72	Mansehra	B.Sc	19.07.93	02.12.2009	19.06.2032	
142.	Ashfaq Ahmad Shah	27.07.73	Peshawar	BA	20.07.93	02.12.2009	26.07.2033	
143.	Muhammad Liaqat	09.03.73	Mansehra	10th	01.04.94	02.12.2009	08.03.2035	
144.	Shah Zaman	15.03.73	Kohistan	10th	09.01.94	02.12.2009	14.03.2035	
145.	Bakht Zada	15.02.71	Malakand Agency	10th	10.05.94	02.12.2009	14.02.2031	

Registrar

SE-I

Supdt. Secret

SE-V

SE-IV

OS, CP

Sl. NO	NAME	DATE OF BIRTH	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	DATE OF RETIREMENT	REMARKS
314.	Bilal Hussain	06.01.80	Peshawar	BA	12.06.2009	22.07.2013	05.01.2040	
315.	Iftikhar Ahmad	16.03.86	Charsadda	BA	12.06.2009	22.07.2013	15.03.2046	
316.	Malik Aman Khan	06.05.85	Nowshera	B.Sc	12.06.2009	22.07.2013	15.05.2045	
317.	Saif ud Din	10.08.84	Kohat	F.Sc	12.06.2009	22.07.2013	09.08.2044	
318.	Farman Ali	11.03.87	Shangla	FA	12.06.2009	22.07.2013	10.03.2047	
319.	Muhammad Nawaz	08.03.71	Dir Upper	BA	12.06.2009	22.07.2013	07.03.2031	
320.	Muhammad Haroon	27.07.90	DIKhan	10 th	12.06.2009	22.07.2013	26.07.2050	
321.	Kifayat Ullah	14.03.88	Bannu	FA	12.06.2009	22.07.2013	13.03.2048	
322.	Muhammad Shoaib	05.04.88	Lakki	B.Sc (Honrs)	12.06.2009	22.07.2013	04.04.2048	
323.	Jalal ud Din	22.02.84	Lakki	FA	12.06.2009	22.07.2013	01.02.2044	
324.	Irfanullah	08.04.89	Lakki	F.Sc	12.06.2009	22.07.2013	07.04.2049	
325.	Farooq Shah	07.04.85	Charsadda	MA	12.06.2009	22.07.2013	06.04.2045	

(MIAN MUHAMMAD ASIF)

Addl. IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. 4122-95 E-V, dated Peshawar, the 17 / 106 /2015.

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

1. All Heads of Police Offices in Khyber Pakhtunkhwa.
2. All Branches in CPO, Peshawar.
3. Incharge, Central Registry Cell, CPO, Peshawar.

4. They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within one month after the issuance of the list, otherwise no representation will be entertained.

Registrar

SE-I

Supdt. Secret

SE-V

SE-IV

OS, CP

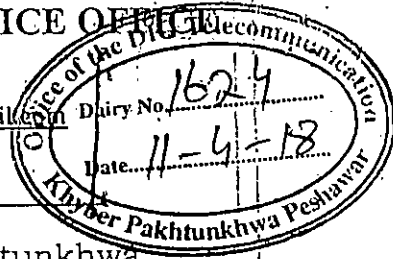
Handwritten signature



17

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

Ph: 091-9210545 Fax: 091-9210927 Email: OSEstabV@gmail.com



No. 1996-2050 /E-V, dated, Peshawar the, 09.04.2018.

To: - The All Heads of Police Offices in Khyber Pakhtunkhwa.

Subject: - SENIORITY LIST OF MINISTERIAL STAFF AS STOOD ON
31.12.2017.

Memo:- Seniority lists of following Ministerial Staff are displayed on Khyber Pakhtunkhwa Police Website:-

1. Office Superintendent (BPS-17)
2. Assistant Grade Clerk (BPS-16)
3. Stenographer (BPS-16)
4. Computer Operator (BPS-16)
5. Qualitative/Quantitative Analyst (BPS-16)
6. Steno Typist (BPS-14)
7. Senior Clerk (BPS-14)
8. Junior Clerk (BPS-11)

(AHSAN SAIFULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

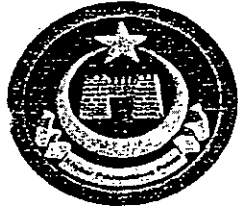
No. 2051-60 /E-V, dated Peshawar the, 09.04.2018.
Copy is forwarded to the:-

- All Addl: IsGP in Khyber Pakhtunkhwa.
- DIG/HQrs Khyber Pakhtunkhwa.
- PSO to IGP Khyber Pakhtunkhwa.
- Director I.T CPO Peshawar. He may please upload the Seniority Lists on Khyber Pakhtunkhwa Police Website.
- PA to the AIG/Establishment Khyber Pakhtunkhwa Peshawar.
- Central Registry Cell CPO Peshawar.

Tele
MT
Dir/Tele
P/MT
P/Tele
Tele
tt/Tele
C/Tele
SI/Tele
Branch/Tele
R/Clerk Tele
Tele
Clerk

(AHSAN SAIFULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Tele



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

last
issue
S/L

SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 31.12.2017

No. 1551 /E-V: The Seniority list of Senior Clerks (BPS-14) of Khyber Pakhtunkhwa Police is published for information of all concerned.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
1.	Roohullah Jan	08.01.1966	07.01.2026	Charsadda	F.A	01.11.1987	06.09.2012	Reverted to the lower post as Senior Clerk vide order No.8327/ES dated 09.11.2017 RPO Mardan Departmental Enquiry Initiated Against him
2.	Muhammad Iqbal	20.11.1960	19.11.2020	Kohat	F.A	04.02.1979	05.09.1988	1)- Reverted to the lower post as Senior Clerk vide order No. 4558-67/EV dated 06.07.2015 2)- Deferred from promotion due to incomplete ACR for the period from 01.01.2015 to 31.12.2015 vide order No.6597-6610/EV dated 31.10.2017
3.	Akbar Ali	09.02.1963	08.02.2023	Swat	10 th	17.01.1982	17.07.1990	1)- Deferred from promotion due to incomplete ACR for the period from 03.07.2013 to 31.12.2013 vide order No.6597-6610/EV dated 31.10.2017
4.	Haibat Khan	30.09.1963	29.09.2023	Bannu	F.A	19.08.1982	16.08.1992	1)- Deferred from promotion due to incomplete ACR for the period from 01.09.2012 to 31.12.2012, 07.03.2013 to 31.12.2013 & for the year 2014, 2015 & 2016. vide order No.6597-6610/EV dated 31.10.2017

181

Handwritten signature and scribble on the right side of the page.


Superintendent F-V.


Superintendent CPB.


Registrar.


AIG/Establishment.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
104.	Muhammad Zaheer	07.05.1971	06.05.2031	Abbottabad	10 th	28.04.1991 FC 23.12.1992 JC	02.12.2009	
105.	Mustansar ur Rehman	20.10.1970	19.10.2030	Peshawar	F.A	01.04.1993	02.12.2009	
106.	Akhtar Abbas Shah	15.12.1971	14.12.2031	DIKhan	10 th	08.04.1993	02.12.2009	
✓ 107.	Noor ul Habib	12.08.1974	11.08.2024	Swabi	B.A	20.06.1993	02.12.2009	
108.	Mohammad Aslam	20.06.1972	19.06.2032	Mansehra	B.Sc	19.07.1993	02.12.2009	
109.	Ashfaq Ahmad Shah	27.07.1973	26.07.2033	Peshawar	B.A	20.07.1993	02.12.2009	
110.	Muhammad Liaqat	09.03.1973	08.03.2033	Mansehra	10 th	01.04.1994	02.12.2009	
111.	Shah Zaman	15.03.1973	14.03.2033	Kohistan	10 th	09.01.1994	02.12.2009	
112.	Bakht Zada	15.02.1971	14.02.2031	Malakand Agency	10 th	10.05.1994	02.12.2009	
113.	Muhammad Bashir	16.02.1972	15.02.2032	Mansehra	10 th	13.07.1994	02.12.2009	
114.	Samiullah	01.02.1969	31.01.2029	Malakand Agency	D.Com	31.07.1994	02.12.2009	
115.	Aftab Nabi	15.01.1974	14.01.2034	Haripur	10 th	21.08.1994	02.12.2009	
116.	Hazrat Yousaf	01.03.1968	28.02.2028	Battagram	F.A	23.08.1994	02.12.2009	
117.	Karim Khan	29.03.1971	28.03.2031	Peshawar	M.A	20.11.1994	02.12.2009	

Superintendent E-V,

Superintendent CPB,

Registrar,

AIG/Establishment.

No. 1552-90 /EV, dated Peshawar, the 30 / 03 /2018.

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

1. Addl: Inspector General of Police, Investigation, Special Branch, Operation & Elite Force Khyber Pakhtunkhwa.
2. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. Commandant, PTC, Hangu.
4. Commandant, CPC, Peshawar.
5. Capital City Police Officer, Peshawar.
6. All Regional Police Officers in Khyber Pakhtunkhwa, Peshawar.
7. Deputy Inspector General of Police, Traffic, CTD, Training, E&I & Telecommunications, Khyber Pakhtunkhwa.
8. Senior Superintendant of Police Traffic, Peshawar.
9. Assistant Inspector General of Police, BDS, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. Deputy Superintendent of Police, PQR.
14. All Branches in CPO, Peshawar.
15. In-charge, Central Registry Cell, CPO, Peshawar.

NOTE: - They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority/ missing of name/date of birth etc, he must submit his representation within one month after the issuance of the list, otherwise no representation will be entertained after the specific period.

Handwritten signature



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

REVISED SENIORITY LIST OF SENIOR CLERKS (BPS-14) AS IT STOOD ON 30.06.2020

No. 3751 /E-V: As per direction of the Competent Authority the Seniority list of Senior Clerks (BPS-14) of Khyber Pakhtunkhwa Police has been revised after threadbare efforts and previous Seniority list have been merged to fix batch-wise Seniority is published for information to all concerned.

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
1.	Muhammad Iqbal	20.11.1960	19.11.2020	Kohat	F.A	04.02.1979	05.09.1988	Awarded major punishment of reversion from Assistant (BPS-16) to Senior Clerk (BPS-14) vide order No. 4558-67/EV dated 06.07.2015.
2.	Haibat Khan	30.09.1963	29.09.2023	Bannu	F.A	19.08.1982	16.08.1992	
3.	Muhammad Aslam	18.05.1965	17.05.2025	Bannu	10 th	06.10.1985	02.12.2009	
4.	Roohullah Jan	08.01.1966	07.01.2026	Charsadda	F.A	01.11.1987	06.09.2012	Awarded major punishment of reversion from Assistant (BPS-16) to the rank of Senior Clerk (BPS-14) vide RPO/Mardan order No. 8327-28/ES, dated 09.11.2017 and Departmental Appeal also rejected vide order No. 869-77/E-V, dated 19.02.2018 by Addl: IGP/HQrs: KPK Peshawar.
5.	Muhammad Shafiq	01.05.1962	30.04.2022	Karak	F.A	02.11.1987	02.07.2015	

Superintendent/E-V,

Superintendent CPB,

Registrar,

[Handwritten signature]

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
74.	Khan Bahadar	02.01.1972	01.01.2032	Karak	10 th	05.09.1992	22.07.2013	
75.	Asad Khan	20.08.1967	19.08.2027	Nowshera	B.A	01.10.1992	02.12.2009	
76.	Niamatullah	04.10.1974	03.10.2034	Lakki	F.A	06.10.1992	02.12.2009	
77.	Khalid Mehmood	01.07.1971	30.06.2031	Charsadda	10 th	19.10.1992	02.12.2009	
78.	Fazal Rahim	01.05.1969	30.04.2029	Tank	F.A	12.11.1992	02.12.2009	
79.	Abdul Malik	19.04.1967	18.04.2027	Tank	F.A	12.11.1992	11.12.2012	
80.	Muhammad Shahid	04.04.1970	03.04.2030	Peshawar	10 th	13.12.1992	02.12.2009	
81.	Muhammad Zaheer	07.05.1971	06.05.2031	Abbottabad	10 th	28.04.1991 FC 23.12.1992 JC	02.12.2009	
82.	Mustansar-ur-Rehman	20.10.1970	19.10.2030	Peshawar	F.A	01.04.1993	02.12.2009	
83.	Akhtar Abbas Shah	15.12.1971	14.12.2031	DIKhan	10 th	08.04.1993	02.12.2009	
84.	Noor ul Habib	12.08.1974	11.08.2024	Swabi	B.A	20.06.1993	02.12.2009	
85.	Muhammad Aslam	20.06.1972	19.06.2032	Mansehra	B.Sc	19.07.1993	02.12.2009	
86.	Ashfaq Ahmad Shah	27.07.1973	26.07.2033	Peshawar	B.A	20.07.1993	02.12.2009	

Superintendent/E-V,

Superintendent CPB,

Registrar,

72

[Handwritten signature]

S/NO	NAME	DATE OF BIRTH	DATE OF RETIREMENT	DOMICILE	EDU: QUAL:	DATE OF APPOINTMENT	DATE OF PROMOTION AS SENIOR CLERK	REMARKS
369.	Muhammad Younas Khan	15.02.1975	14.02.2035	Bannu	M.A	07.07.2009	07.11.2019	
370.	Sanaullah	10.05.1985	09.05.2045	Peshawar	F.A	07.07.2009	07.11.2019	
371.	Sajid Ali Shah	30.03.1977	29.03.2037	Kohat	F.A	08.07.2009	07.11.2019	
372.	Asif Khan	04.02.1982	03.02.2042	Charsadda	M.A	08.07.2009	07.11.2019	
373.	Toqeer Ahmad	20.09.1978	19.09.2038	Abbottabad	10 th	08.07.2009	07.11.2019	
374.	Sohail Ahmad	04.08.1984	03.08.2044	Peshawar	F.SC	23.07.2009	07.11.2019	

NOTE: Any officer who has any objection regarding his Seniority/Missing of name/Date of Birth etc, he must submit his representation within one month after the issuance of this list, otherwise no representation will be entertained after the specific period.

23
Superintendent E-V,

Superintendent CPB,

Registrar,

(KASHIF ZULFIQAR) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. 3752-70 /E-V, dated Peshawar, the 21/10/2020.

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

1. All Addl: Inspector General of Police, in Khyber Pakhtunkhwa.

2. Capital City Police Officer, Peshawar.
3. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. Commandant, PTC, Hangu.
5. All Regional Police Officers in Khyber Pakhtunkhwa.
6. All Deputy Inspector General of Police, in Khyber Pakhtunkhwa.
7. Chief Traffic Officer, Peshawar.
8. Commandant, CPC, Peshawar.
9. Assistant Inspector General of Police, BDU, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. All Superintendent of Police, Investigations in Khyber Pakhtunkhwa.
14. Deputy Superintendent of Police, PQR.
15. All Branches in CPO, Peshawar.
16. In-charge, Central Registry Cell, CPO, Peshawar.

24

[Handwritten signature]

بخدمت عزت مآب جناب انسپکٹر جنرل آف پولیس صاحب خیبر پختونخواہ پشاور

عنوان:- محکمانہ اپیل برخلاف سیناری ٹی لسٹ برائے سینئر کلرکس مورخہ: 21-10-2020

جناب عالی!

بحوالہ ایڈیشنل انسپکٹر جنرل آف پولیس ہیڈ کوارٹرز خیبر پختونخواہ پشاور کے دفتر چھٹی انگریزی نمبری CPO/CPB/376 مورخہ: 10-12-2020 (جس کے تحت کسی بھی افسر یا ماتحت کو نظر ثانی شدہ سیناری ٹی پراگر کوئی اعتراض ہو تو وہ اپنی Representation عرصہ ایک ماہ کے دوران پیش کر سکتے ہیں)۔ حسب ذیل عرض رساں ہوں۔

(1)۔ یہ کہ بحوالہ دفتر IGP صاحب خیبر پختونخواہ CPO پشاور Endst No. 3752-70/E-V مورخہ 21-10-2020 سینئر کلرکوں کی جاری شدہ Revised سیناری ٹی لسٹ 30-06-2020 غلط ہے۔ اور اس میں چند نکات و خامیاں توجہ طلب ہیں۔ اس لسٹ میں ترقیاتی کے منتظر 24/25 سال اور اس سے زائد ملازمت کرنے والے بے داغ سردس کے حامل سینئر کلرکوں کے ساتھ ظلم اور زیادتی ہوئی ہے۔ جس کی تفصیل حسب ذیل گوش گزار ہوں۔

(i)۔ 30-06-2020 کی سینئر کلرکوں کی نظر ثانی شدہ لسٹ میں کئی جونیئر، سینئر کلرکوں کو آگے درج کر کے سینئر کر دیا گیا ہے۔ اور یہ بات

لسٹ (F/A) میں واضح طور پر دیکھی جاسکتی ہے۔ مثال کے طور پر اس لسٹ میں سیریل نمبرز 5، 6، 7، 10، 14 سے 22، 31، 38، 41، 42، 46، 47، 50، 61، 65، 74 اور 140 وغیرہ جو پچھلے تین سالوں کی جاری کردہ لسٹوں میں بہت جونیئر تھے۔ ان کو اس لسٹ میں سینئر کر دیا گیا ہے۔

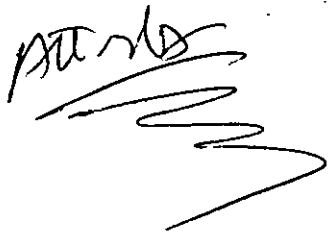
(ii)۔ 30-06-2020 کی سینئر کلرکوں کی لسٹ میں درج سیریل نمبرز 12، 25، 35، 40، 49، 54، 69، 87، 88، 96، 114، 118، 148 اور 196 وغیرہ جن کا نام پچھلے تین سالوں کی سیناری ٹی لسٹوں میں سرے سے موجود ہی نہیں ہے۔ اور جو 07-11-2019 کو سینئر کلرکس ترقیاب ہوئے ہیں۔ ان کو اس لسٹ میں سینئر کر دیا گیا ہے۔ ان کے دیر سے ترقیاب ہونے کی کوئی توجہات ہوگی۔ انہیں سینئر کر دینا دیگر سینئر کلرکوں کے Career کی تباہی کا باعث ہے۔

(iii)۔ 30-06-2020 کی لسٹ میں درج سیریل نمبر 24 فضل خالق جسکو Lower Stage کی سزا بھی ہو چکی ہے۔ اور جو پچھلے تین سالوں کی لسٹوں میں بہت جونیئر ہے۔ اور اس کی سینئر کلرک ترقی 02-07-2015 کو ہوئی تھی۔ تو کیا یہ سزا سیناری ٹی پراثر انداز نہیں ہوگی اور کیا نظر ثانی شدہ سیناری ٹی دیتے وقت یہ سزا افسران بالا کے علم میں لائی گئی تھی؟

(iv)۔ 30-06-2020 کی لسٹ میں درج سیریل نمبر 25 کو سال 2014ء میں 5 سال کے لئے Time Scale جونیئر کی سزا ہوئی تھی اور 2007 کی سیناری ٹی لسٹ میں Bottom پر کر دیا گیا تھا۔ اور بدیں وجہ اسکی ترقی بھی 07-11-2019 کو بطور سینئر کلرک دیر سے ہوئی (F/B قابل ملاحظہ ہے) اسکا نام پچھلے تین سالوں کی سیناری ٹی لسٹوں میں نہیں ہے، نہ ہی اسکے نام کے آگے اس سزا کا ذکر ہے، پھر بھی اسے سینئر کر کے سیریل نمبر 25 پر کر دیا گیا ہے جو کہ سراسر نا انصافی ہے۔

(v)۔ 30-06-2020 کی لسٹ میں سیریل نمبر 26 شاہ زمان جو کہ مورخہ 11-12-2012 کو سینئر کلرک ترقیاب ہوا تھا، کا نام پچھلے تین سالوں کی سیناری ٹی لسٹوں میں سرے سے درج نہیں تھا تو اس بار کیسے آگیا۔ جب یہ 11-12-2012 کو سینئر ترقیاب ہوا تھا تو اسکا نام 2016، 2017 اور 2018 کی سیناری ٹی لسٹوں میں کیوں نہیں ڈالا گیا؟

(vi)۔ 30-06-2020 کی لسٹ میں درج سیریل نمبر 39 پراج ملوک (جو کہ مورخہ 02-07-2015 کو سینئر کلرک ترقیاب ہوا تھا اور جسے 2 مرتبہ یعنی 2016 اور 2020 میں نظر ثانی شدہ سیناری ٹی دی گئی ہوئی ہے) کا نام 2016 کی لسٹ میں سیریل نمبر 76 پر ہے لیکن 2017 اور 2018 کی لسٹ میں اسکا نام نہیں ہے۔ یہ کس کی غفلت ہے اور ایسا کرنے سے کیا مقصد ہے؟



(vii) - 30-06-2020 کی سینیارٹی لسٹ میں سیریل نمبر 43 پر درج گل کریم جسکو 2018 کی لسٹ میں 289 سے اٹھا کر سیریل نمبر 43 پر کر دیا گیا ہے۔ اور پچھلے تین سالوں کی سینیارٹی لسٹوں میں اس کے نام کے آگے کیفیت میں صرف یہ درج ہے کہ

Revised سینیارٹی یا Vide Order Endst: No.22788-91/E-III, dated: 14-09-2009 اب یہ کیا ہے؟ سزا ہے،

کچھ اور؟ اس کے علاوہ 30-06-2020 کی سینیارٹی لسٹ میں اسکا اندراج نہ کرنے کی غرض کیا ہے؟

(viii) - 30-06-2020 کی سینئر کلرکوں کی سینیارٹی لسٹ میں درج کئی سینئر کلرکوں کو نظر ثانی شدہ سینیارٹی دی گئی ہے تو کیا افسران بالا کی خدمت میں انکی

سینیارٹی متاثر ہونے کی وجوہات رکھی گئی ہیں اور جن کو نظر ثانی شدہ سینیارٹی دی گئی ہے اور ان سے باہر س ہوئی ہے کہ کیا ابھی تک وہ سوائے ہوئے

تھے؟ حالانکہ ہر سال جب نئی سینیارٹی لسٹ جاری ہوتی ہے تو اس میں صاف درج ہوتا ہے کہ اگر کسی کو اس لسٹ میں سینیارٹی وغیرہ پر کوئی اعتراض ہو تو

وہ عرصہ ایک ماہ میں اپنی Representation ارسال کر سکتا ہے بصورت دیگر اس کی Representation منظور نہیں کی جائیگی۔ جب ایک

ملازم یا کلرک Revised سینیارٹی کے لئے درخواست دیتا ہے تو اس سے یہ کیوں نہیں پوچھا جاتا کہ وہ اتنے عرصے بعد کیوں درخواست دے رہا

ہے۔ جبکہ ہر سال اسے یہ موقع دیا جاتا رہا ہے اور دوسری بات یہ کہ اگر ایسا ہے تو پھر سینیارٹی لسٹ میں Representation کیلئے ایک ماہ کا

وقت دینے کا کیا فائدہ؟ 2016، 2017، 2018 اور 2020 کی سینئر کلرکوں کی سینیارٹی لسٹوں کے Last اور Second Last

صفحات کی کاپیاں (F/"E", F/"D", F/"C"/F/"B") برائے ملاحظہ ہمراہ لف ہیں۔

(2) - یہ کہ جیسا کہ سنٹرل پولیس آفس میں تعینات تمام سینئر سٹاف کے علم میں ہے کہ اوائل میں ٹریفک برانچ اور Out اضلاع میں تعینات ٹریفک کلرکس،

MVE کلرکس اور Pay Accounts برانچ میں تعینات جونیئر کلرکس وغیرہ ترقی For go کرتے رہے ہیں۔ اور یہ بات سال 1994

سے 2005 تک کی ہونے والی سینئر کلرکوں کی پروموشن کی D.P.C Minutes اور میٹنگوں اور D.P.C سے کنفرم کی جاسکتی ہے، اگر انکار یا کارڈ

موجود ہو اور غائب نہ کر دیا گیا ہو۔ تو اس وقتوں کے پروموشن For go کرنے والے اب سینئر کر دئے گئے ہیں تو کیا یہ نا انصافی نہیں ہے؟ اور کیا

ان کا پروموشن For go کرنا افسران بالا کے نوٹس میں لایا گیا یا نہیں؟

(3) - یہ کہ 31-12-2016 کی سینئر کلرکوں کی لسٹ میں سیریل نمبر 94 پر انوار الحسن کا نام درج ہے جو کہ 11-12-2012 کو سینئر کلرک ترقیاب ہوا تھا

اور 2016 میں ہی اسے Assigned Revised/Inter-se seniority دی گئی تھی اسکا نام 2017 اور 2018 کی سینیارٹی لسٹوں

میں سرے سے موجود ہی نہیں ہے۔ لیکن پھر بھی اسے CPO کے نوٹیفیکیشن نمبری 4314-31/E-V مورخہ: 17-09-2019 کے تحت سیریل

نمبر 44 پر اسٹنٹ ترقیاب کیا گیا ہے۔ (لف F/"F" ہے) اسی طرح 2016 ہی کی سینیارٹی لسٹ میں سیریل نمبر 359 پر درج حسین علی

Under Enquiry ہے۔ اور 2017 کی سینیارٹی لسٹ میں 323 نمبر پر ہے اور اس سے 2 سالانہ اینکر میٹس Stopped With

Commulative Effect ہوئے ہیں، اسے 2018 کی سینیارٹی لسٹ میں نظر ثانی شدہ سینیارٹی دے کر سیریل نمبر 10 پر کر دیا گیا اور

17-09-2019 کے نوٹیفیکیشن کے تحت سیریل نمبر 4 پر اسے بھی اسٹنٹ گریڈ کلرک ترقیاب کیا گیا (لف F/"G" ہے)۔ اڈل الذکر کا نام

2017 اور 2018 کی لسٹوں میں کیوں نہیں ہے۔ اور آخر الذکر کی سزا کدھر گئی؟ پھر انہیں ترقیاب کیا گیا۔ کیا مذکورہ بالا حقائق افسران بالا کے نوٹس

میں لائے گئے تھے؟

(cont: Page No.3)

Handwritten signature and scribble.

(4) - یہ کہ 30-06-2020 کی سینیاریٹی لسٹ پر غور فرمایا جائے تو پتہ چلے گا کہ اس لسٹ میں درج سیر نیل نمبر 103 پر محمد نواب کا نام پچھلے تین سالوں کی لسٹوں میں 2،2،2 بار درج کیا گیا ہے جسکی تفصیل حسب ذیل ہے۔

نام	30-06-2020	31-12-2018	31-12-2017	31-12-2016
محمد نواب	103	195 + 314	199+324	231+360

اور سب سے بڑی بات یہ کہ پچھلے تین سالوں کی سینیاریٹی لسٹوں میں Under Lined سیر نیل نمبرز کے آگے سزا کا ذکر ہے جبکہ دیگر کے آگے اور 2020 کی لسٹ میں سیر نیل نمبر 103 کے آگے سزا کا ذکر نہیں کیا گیا ہے۔ ایسا کیوں ہے اور ایسا کرنے کی غرض اور مقاصد کیا ہیں، اس کی باز پرس افسران بالا ہی کر سکتے ہیں۔

(5) - یہ کہ جو نیئر کلاس، سنٹنٹ گریڈ کلاس، شیونٹا پمپسٹس، شیونگرافرز اور آفس سپرنٹنڈنٹس کی سینیاریٹی لسٹوں میں فرق نہیں آتا، اور صرف سینئر کلاس ہی کی سینیاریٹی میں کیوں فرق آجاتا ہے۔ شاید اسی لئے 31-12-2019 کو سینئر کلاس کی سینیاریٹی لسٹ جاری بھی نہیں کی گئی۔ ایسا کیوں ہے یا کیوں کیا گیا ہے؟

(6) - یہ کہ بر مطابق رولز پالیسی خیبر پختونخواہ اسٹبلشمنٹ ڈیپارٹمنٹ کی آسامیاں 25 فیصد Fresh Appointment اور 75 فیصد بذریعہ محکمہ ترقی پڑ کرنے کی ہدایات جاری کی ہوئی ہیں۔ (لف "F/H" ہے) لیکن بد قسمتی سے پولیس ڈیپارٹمنٹ سے ایک طرف تو 50 فیصد اسٹنٹ کی آسامیاں پبلک سروس کمیشن کو دی جاتی ہیں تو دوسری طرف جو نیئر ترین سینئر کلاس کو ترقی دے کر 24/25 سال یا اس سے زیادہ سروس کرنے والے بے داغ سروس کے حامل اور اسٹنٹ ترقیابی کے منتظر سینئر کلاس کو سینئر کر دیا جاتا ہے۔ جس سے سینئر کلاس کی Career تباہی کے دہانے پر ہے۔ علاوہ ازیں جن کا مستقبل تباہ ہو رہا ہے ان سب سینئر کلاس میں بے چینی پھیلی ہوئی ہے۔

آپ صاحبان سے دست بستہ اور ہمدردانہ استدعا ہے کہ ازراہ ماتحت پروری مذکورہ بالا حقائق اور شواہد کے پیش نظر:-

(i) - 30-06-2020 کی سینئر کلاس کی نظر ثانی شدہ سینیاریٹی لسٹ بحوالہ E-V/3751-70/Endst No. مورخہ: 21-10-2020 ("F/A") کو منسوخ کرنے اور سینئر کلاس کی سینیاریٹی 31-12-2018 کی سینیاریٹی لسٹ بحوالہ E-V/1441-67/Endst No. مورخہ: 26-03-2019 ("F/I") کے تحت مقرر کرنے کے احکامات صادر فرمائیں۔

(ii) - اسٹنٹ گریڈ کلاس کی خالی آسامیاں، بحوالہ اسٹبلشمنٹ ڈیپارٹمنٹ کی نوٹیفیکیشن نمبری SOE-IV(E&AD)/1-35/2012 مورخہ: 06-12-2012 ("F/J") موصول از ہوم ڈیپارٹمنٹ خیبر پختونخواہ، بحوالہ Letter No. SO(Police-I)/HD مورخہ: 20-11-2017 Recruitment through PSC کے تحت 25 فیصد Fresh Appointment اور 75 فیصد By Promotion کرنے کے احکامات صادر فرمائیں۔

(iii) - متعلقہ شاف کوختی سے ہدایات جاری فرمادیجئے کہ کسی بھی ملازم کو نظر ثانی سینیاریٹی دیتے وقت تمام پُرانے ریکارڈز، سینیاریٹی وغیرہ چیک کر کے افسران بالا کے نوٹس میں لائیں اور Like and Dislike کے اصول سے گریز کریں۔

العارض

آپ کا تابع حکم

نورالحیب (سینئر کلرک)

متعینہ پولیس ٹریننگ سکول صوابی۔

مورخہ: 31-12-2020

محمد نواب

28



Tel No. 0938-280411
Fax No. 0938-280410
Email: ptsswabi@gmail.com

OFFICE OF THE DIRECTOR POLICE TRAINING SCHOOL SWABI.

To: The Deputy Inspector General of Police,
Directorate of Training Khyber Pakhtunkhwa,
Peshawar.

No. 10 /GB, dated Swabi the 4/01 /2021.

Subject:- **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED SENIORITY LIST DATED 21.10.2020 OF THE SENIOR CLERKS BPS-14, AS IT STOOD ON 3.0.06.2020**

Memo:

Kindly refer to the CPO Peshawar memo: No. CPO/CPB//376, dated 10.12.2020, on the subject noted above.

Enclosed kindly find herewith an application as departmental appeal submitted by Senior Clerk Noor -UI-Habib of this institution for favour of perusal and onward submission to CPO Peshawar please.

**Director,
Police Training School,
Swabi.**

پندرہ الٹ چٹاپ سرسٹریٹ ٹریبیونل، لاہور، پندرہ الٹ چٹاپ سرسٹریٹ، لاہور

متوجہ: انتظامیہ
ذوالحجہ
تمام
محکمہ لٹریچر
دعویٰ اپیل

باسمہ تعالیٰ

مقررہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی مستحلفہ آل مقام لاہور کیسٹم سٹینڈ انڈیا، خان سرورڈے اینڈ وکیٹ، ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب مروف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا نیز وکیل صاحب کو کرنے والی نامہ و اقرار ثالث و فیصلہ برتلاف دینے جواب دہی اور اقبال دعویٰ اور لیکچرنگ ڈگری کرنے اجراء اور وصولی چیک و درپیر اور مرضی دعویٰ اور درخواست ہر قسم کی تعدیل اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا تاخیر یا کسی طرفہ یا اپیل کی برآمدگی اور مستحلفہ نہیں دیا کرتے اپیل نگران و نظرانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ نہ کر کے کہیں یا مجزوی کاروائی سے واسطے اور وکیل یا نواز قانوی کو اپنے ہمراہ یا اپنی بجائے مقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جویہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواغت منٹاویہ قبول ہوگا و دوران مقدمہ میں جو شرحیہ و ہر جانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب مروف ہوں گے نیز لٹریچر و فرسپہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام زورہ پر ہو یا عدسے باہر ہو تو وکیل صاحب یا مقدمہ ہوں گے کہ پیروی مذکور کریں۔
لہذا وکالت نامہ دیکھ دیا کہ مستند ہے۔

21-04-21

القائم
القائم
القائم
ارباب عین اکمال
ایڈووکیٹ
سیدہ الشہد خان مرشد
ایڈووکیٹ
محمد نواز
ایڈووکیٹ

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

Service Appeal No. 5700/2021

Noor ul Habib..... (Appellant)


VERSUS

IGP KP etc.....(Respondents)

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Para-wise comments		1-3
2.	Affidavit		4
3.	Copy of section 17 of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules, 1989	A	5

DEPONENT


(TARIQ UMAR)
DSP/ Legal,
CPO, Peshawar.

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. 5700/ 2021.

Noor ul Habib..... (Appellant)

VERSUS

Inspector General of Police KP etc..... (Respondents)

PARA-WISE COMMENTS BY RESPONDENT NO. 1 & 2.

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appeal is not based on facts.
- b) That the appellant has got no cause of action and locus standi to file present appeal.
- c) That the appeal is bad for non-joinder and miss-joinder of necessary and proper parties.
- d) That the appellant is stopped by his own conduct to file the present appeal.
- e) That the appeal is not maintainable in the present form.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.

FACTS:

1. Pertains to service record of the appellant hence needs no comments.
2. Pertains to record of inter se seniority of appellant and private respondents hence needs no comments.
3. Incorrect. The appellant is junior to the private respondents as seniority always reckon from the first appointment not from the first promotion.
4. Pertains to record. In the revise seniority respondents placed the appellant and private respondents at right place in accordance with date of appointment under the rules.

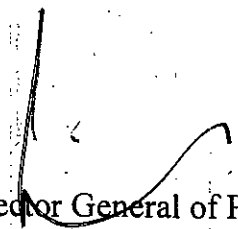
5. Pertains to record. The objection of appellant was misconceived and against the norms and service rules thus turned down.
6. Incorrect. As already explained in Para No. 3 that seniority always reckon from the first appointment not from the promotion hence the stance of the appellant is not legally justified as the seniors to the appellant are placed on right place in the seniority list. The instant service appeal of the appellant is not maintainable on the following Grounds.


GROUND:

- A. Pertains to service record of the appellant needs no comments.
- B. Incorrect. As already explained in Para No. 3 & 6 of Facts. Promotion does not affect the original seniority as per Section 17 Sub- Section b (I) & (II) of Civil Servants (Appointment, Promotions & Transfer) Rules, 1989. Seniority reckon from the date of appointment. (Copy of Section 17 of (Appointment Promotion and Transfer), Rules 1989 is enclosed as "A").
- C. Incorrect and misconceived. As already explained in preceding Paras. The plea of appellant has no legal value under the Service rules.
- D. Incorrect. The appellant has got no cause of action as he is not an aggrieved person. Respondents have prepared seniority in accordance with law/ rules and then properly circulated.
- E. Incorrect. The answering respondents are bound to perform their duties in accordance with law/ rules. Seniority list is issued at the end of calendar year while revised seniority is issued on the representation of any official.
- F. Incorrect. As already explained that answering respondents acted in accordance with law/ rules and treated all the officials fairly and in accordance with Service Rules.
- G. Incorrect. Inter-se seniority of the officials is revised by the Committee in the light of representation of the aggrieved officials in accordance with facts and Rules. The application of the appellant was examined by the Committee and regretted.

PRAYERS:

In view of the above narrated facts, it is, humbly prayed that the instant service appeal is not maintainable being devoid of merits may kindly be dismissed with costs, please.


Deputy Inspector General of Police,
HQrs: Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 2)


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 1)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 5700/2021

Noor ul Habib..... (Appellant)


VERSUS

IGP KP etc.....(Respondents)

AFFIDAVIT

I, Tariq Umar Acting DSP/ Legal CPO, Peshawar do hereby solemnly affirm on oath that the contents of accompanying comments on behalf of Respondents No. 1 & 2 are correct to the best my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.

Respondents through



(TARIQ UMAR)

DSP/ Legal,
CPO, Peshawar.

17301-4997553-7

0333-8878882

PART-VI

SENIORITY

17. **Seniority :-** (1) the seniority inter se of civil servants ⁴⁷(appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission ⁴⁸[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

Explanation-II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

Explanation-III:- A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

⁴⁹(3) In the event of merger/restructuring of the Departments, Attached Departments or Subordinate Offices, the inter se seniority of civil servants affected by the merger/restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

⁵⁰(4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the

⁴⁷ Substituted for the words appointment to a post in the same basic pay scale in a cadre by Notification No. SOR-I(S&GAD)4-1/80, dated 17-05-1989.

⁴⁸ The words inserted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 04-02-1996.

⁴⁹ Sub-rule (3) of Rule 17 added vide Notification No. SOR-I(E&AD)4-1/80/IV, dated 28-5-2002.

⁵⁰ Sub-rule (4) of Rule 17 added vide Notification No. SOR-VI (E&AD) 1-3/2008 dated 19-11- 2009.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

C.M. No. _____/2021

IN

S.A. No. 5703/2021

Noor ul Habib

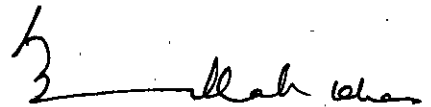
versus

PPO & Another

INDEX

S. No	Documents	Annex	P. No.
1.	Memo of Application		1
2.	affidavit		2
3.	Notification for promotion	"A"	3-4

Through Appellant



Saadullah Khan Marwat
Advocate.
21-A Nasir Mansion,
Shoba Bazaar, Peshawar.
Ph: 0300-5872676

Dated: 01-12-2021

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

Pray to the court with relevant appeal.

C.M. No. _____/2021

IN

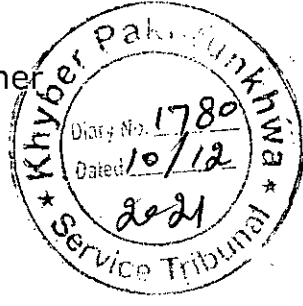
S.A. No. 5743/2021

Noor ul Habib
10/12/21

Noor ul Habib

versus

PPO & Another



Neerhu

APPLICATION FOR DIRECTION TO RESPONDENTS TO NOT MAKE PROMOTION TO THE POST OF ASSISTANT GRADE CLERKS TILL THE FINAL DISPOSAL OF THE CASE:

Respectfully Sheweth;

1. That the subject appeal is pending disposal before this hon'ble Tribunal and is fixed for *14-02-2022*
2. That respondents initiated process of promotion to promote the private respondents to the post of Assistant Grade Clerks and if the said promotion was finalized then in such a case, applicant will be deprive and will become junior to the juniors. (Copy as annex "A")
3. That in the interest of justice, such promotion is required to be not made till the disposal of the appeal as the same would become in-fractious. *Copy as Annex*

It is, therefore, most humbly prayed that the application be accepted as prayed.

[Signature]

Appellant

Through

[Signature]
Saadullah Khan Marwat
Advocate

Dated 01-12-2021

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

C.M. No. _____/2021

IN

S.A. No. _____/2021

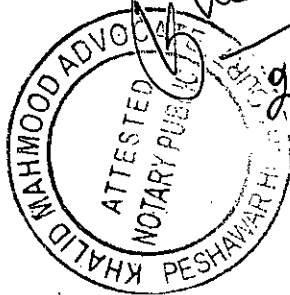
Noor ul Habib

versus

PPO & Another

AFFIDAVIT

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


DEPONENT



8/49
29/10/21

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

No. CTO/CPI/DP/CI/400

Dated Peshawar 29 October 2021

Most Immediate/Top priority.

- To:-
- The Addl: Inspector General of Police, Elite Force
Khyber Pakhtunkhwa, Peshawar.
 - The Capital City Police Officer, Peshawar.
 - The Deputy Inspectors General of Police, Internal Accountability, Special Branch,
Operations, CTD, Tele, Traffic, Finance & Procurement and Training,
Khyber Pakhtunkhwa, Peshawar.
 - The Commandant, Police Training College, Hangu.
 - The Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Bannu and
D.I. Khan Regions.
 - ✓ The Commandant, Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.
 - The Assistant Inspectors General of Police Legat & BDU, Khyber Pakhtunkhwa.
 - The Director, CPC and ACE, Khyber Pakhtunkhwa, Peshawar.

Subject: INFORMATION REGARDING SENIOR CLERKS & STENOTYPISTS
(BPS-14) TO THE RANK OF ASSTT: GRADE CLERKS AND
STENOGRAPHERS (BPS-16)

Memo:-

As directed by the Competent Authority, a meeting of Departmental Promotion Committee will be held shortly regarding promotion of Senior Clerks & Stenotypists (BPS-14) to the rank of Asstt: Grade Clerks and Stenographers (BPS-16)

It is requested that the following information of Senior Clerks & Stenotypists serving in your Regions/Units may please be sent to this office within week time:-

- i. Present posting.
- ii. No Departmental Enquiry Certificates

S.NO	NAME OF SENIOR CLERKS	DATE OF BIRTH	HOME DISTRICT
1.	Muhammad Aslam	18.05.1965	Bannu
2.	Gul Said	06.08.1969	Kohat
3.	Muhammad Shafiq	01.05.1962	Karak
4.	Ibrar Hussain	13.08.1966	Peshawar
5.	Muhammad Abid-I	12.10.1968	Kohat
6.	Imdad Hussain Shah	25.03.1969	Bannu
7.	Muhammad Shoail	01.01.1969	Swabi
8.	Sibghatullah-I	08.05.1964	Bannu
9.	Ajmal Khan	01.04.1969	Peshawar
10.	Muhammad Bushir-II	02.01.1971	Manshra
11.	Muhammad Younis	18.01.1972	Bannu
12.	Shoukat Ali	14.06.1970	DIKhan
13.	Zikria Khan	04.05.1972	Nowshera
14.	Rij Muloak	01.04.1966	Buner
15.	Gul Karim	29.02.1965	Chursadda
16.	Shahid Mehmood	10.04.1965	Kohat
17.	Noor-Ul-Arifeen	01.04.1970	Buner
18.	Ikrum-ul-Haq	16.05.1971	Chursadda
19.	Shahid Ali	01.04.1972	Peshawar
20.	Sardar Ali	15.03.1971	Swat
21.	Walid uz Zaman	21.02.1971	Karak

Handwritten signature and scribble

S.NO.	NAME	DATE OF BIRTH	HOME DISTRICT
22	Rashid Mehmood	01.05.1972	Peshawar
23	Shah Nawaz	12.02.1969	Kohat
24	Sahar Gul	12.04.1971	Peshawar
25	Umar Zada	18.05.1972	D.I.Khan
26	Badshah Din	01.04.1972	Bannu
27	Aziz Khan	12.02.1965	Peshawar
28	Irfanullah -1	06.10.1970	D.I.Khan
29	Sherin Badshah	08.05.1966	Karak
30	Gul Aslam	10.08.1966	Lakki
STENOGRAPHERS			
1.	Shah Faisal	16.08.1969	Mardan
2.	Shams-Ur-Rehman	22.02.1970	Karak
3.	Siraj Hussain	27.03.1989	Khyber Agency
4.	Shakeel Ahmad	17.05.1993	Nowshera
5.	Adnan Saeed	03.04.1988	Peshawar
6.	Tasadduq Hussain	04.04.1987	Peshawar
7.	Miraj-Ud-Din	03.01.1993	Chitral
8.	Ibrar-Ud-Din	01.05.1994	Dir Upper
9.	Muhammad Tariq	10.12.1989	Swat
10.	Hafiz-Ur-Rehman	02.01.1989	Chitral
11.	Aamir Siddique	06.11.1988	Abbottabad
12.	Walid Ali	12.02.1985	Mohmand Agency
13.	Adil Inyed	02.10.1991	Abbottabad
14.	Syed Sajid Ali Shah	05.04.1987	Moh. Agency
15.	Muhammad Sohail	02.05.1994	Bannu
16.	Abdur Rahim	10.10.1994	Swat
17.	Hilal Ahmad	11.06.1996	Peshawar
18.	Muhammad Faizan	19.04.1980	Peshawar
19.	Shah Hussain	15.04.1991	Peshawar
20.	Fazal Khaliq	25.03.1991	Peshawar

Note: This office may also be informed if any Senior Clerk or Stenographer of your Region/Unit has been died, retired, reverted or dismissed from service

Z. Asghar
 (ZEESHAN ASGHAR) PSP
 AIG/Establishment,
 For Inspector General of Police,
 Khyber Pakhtunkhwa,
 Peshawar.

39/c - Wre arky. (51. 2)

✓ Endst: No. and dated even

✓ Copy forwarded to the:

✓ 1. AIG, Inspector General of Police, Investigation, Khyber Pakhtunkhwa

✓ 2. Deputy Inspector General of Police, HQ, Khyber Pakhtunkhwa.

✓ 3. PSO to Worthy Inspector General of Police, Khyber Pakhtunkhwa.

✓ 4. Registrar, Central Police Office

✓ 5. Deputy Superintendent of Police, Operation, with the direction to fix the subject letter to all concerned Police Offices.

6. Supt. Secret to provide synopsis of above named Senior Clerks and Stenographers in Career Planning Branch.

Office Supt. Establishment-V, CPO Peshawar.

All Branches in CPO.

Copy to AIG/Establishment, Khyber Pakhtunkhwa.

9/19/2017

Asghar

[Handwritten signature]