

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

In the matter of

Service Appeal No.1781/2022

Mr.Muhammad Abid Hussain, Head Warder (BPS-09), Central Jail, Peshawar

.....(**Appellant**)

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary Establishment Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
3. The Secretary Finance Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
4. The Secretary Govt: of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
5. The Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar.

.....(**Respondents**)

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Deponent

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4. The Secretary Govt: of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
5. The Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar.

.....(Respondents)

SUBJECT: JOINT PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 TO 5 are as under.

Respectfully Sheweth:-

PRELIMINARY OBJECTION:

Khyber Pakhtunkhwa Service Tribunal
Peshawar

Case No. 7590

Dated 18/09/23

- i. That the Present service appeal is incompetent in its present form.
- ii. That the appellant has got no locus standi to file the instant appeal.
- iii. That the appellant has estopped by his own conduct to file appeal.
- iv. That the appellant has not come to this Honourable Service Tribunal with clean hands.
- v. That the present appeal is bad for mis-joinder and non-joinder of necessary parties.
- vi. That the present appeal is badly Time-barred.
- vii. That the present appeal is not based on solid ground liable to be dismissed with cost.
- viii. That this Honourable Tribunal has no jurisdiction to interfere for the enhancement of quota which is fully fall within the domain of Provincial government.

Objection on Facts:

1. Pertains to record.
2. Pertains to his service. Hence needs no comments.
3. Admitted as the Provincial Government has notified service Rules/Service structure for the employees of the Prisons Department of different cadres wherein, the service structure of each employee have been mentioned categorically for the purpose of their career progression (**Notification dated 15/04/2022 is enclosed as Annexure-A**).
4. No comments.
5. Incorrect and not admitted, according to the Notification dated 15/04/2022, the quota reserved for the said cadre (Appellant) i-e Head Warder/Chief Head Warder was allocated for promotion to the post of Assistant Superintendent Jail was 30% on the basis of seniority cum fitness from amongst the Chief Head Warders having secondary school certificates or its equal qualification from a recognized Board with at least 05 years service as Head Warder and

Chief Head Warder subject to the successful completion of promotion course prescribed for Assistant Superintendent Jail and clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail, whereas against the 10 % promotion quota amongst the Senior Clerks who possess the below noted qualifications:-

(a) 10 % by promotion on the basis of Seniority-cum-fitness, from amongst the holders of the post in service Senior Clerks, who possess minimum qualification or eligibility criteria prescribed for initial recruitment, with at least 05 years service as Junior clerk and Senior Clerk, subject to:-

- (i) Successful completion of Promotion course prescribed for Assistant Superintendent Jail; and
- (ii) Clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and

(b) Physical Standard

- (i) Height 5 feet and 7 inches;
- (ii) Chest, 33/34 inches without expansion and 33/34 1/2 with expansion;
- (iii) Vision of eyes 6/6 without glasses;
- (iv) Free from any kind of disability.

6. Admitted to the extent that 10 % quota are reserved for Senior Clerk to the post of Assistant Superintendent Jail for the purpose of promotion, the qualification has been enhanced from FA/FSc to BA/BSc having passed mandatory departmental examination while the Warder cadres are mostly matriculate having less qualification enjoying much more quota for promotion to the post of Assistant Superintendent Jail (BPS-16) which is 30% .Recently, enhanced from 25% so the stance of the present appellant is baseless, unjustified and not based on solid ground. It is pertinent to mention here that for promotion to the Post of Junior Clerk, allocation has been made as under:-

- A. 25 % by promotion on the basis of seniority/cum fitness.
- B. 25% by initial recruitment from amongst Warders cadre who have at least 05 years service and possess minimum qualification prescribed for initial recruitment i-e FA/FSc. With 2nd division or its equivalent qualification from recognized board.
- C. and 50 % by initial recruitment.

At the very outset, the way of promotion is also open for Warder cadres to step into the shoes of ministerial cadre and the same way of promotion are also extended to ministerial cadre i-e Junior Clerk/Senior Clerk to be promoted to the post of Assistant Superintendent Jail (BPS-16) protected by Service Rules vide Annex-A Notified dated 15/04/2022. Hence, keeping in view the above position the allocation of 30% quota for Chief Head Warder for promotion to the post of Assistant Superintendent Jail (BPS-16) which are

more than 50% by sanctioned strength of Chief Head Warder (BPS-11) are sufficient. Hence, the stance of the present appellant to the effect that 10% quota which are allocated for the cadre of Senior Clerk to be removed for the purpose of promotion to the post of Assistant Superintendent Jail (BPS-16) is totally unjustified, baseless and without any justification.

7. Incorrect and not admitted. The Senior Clerk promoted to Assistant Superintendent Jail are graduate with possession of physical standard as required under Service Rules while Chief Head Warder are matriculate qualification, hence the comparison between Senior Clerk to Chief Warder are much more difference in capability/competency running of official businesses as per ground experiences.
8. Incorrect and not admitted. According to the existing service rules, ratio for promotion of Chief Head Warder to the post of Assistant Superintendent Jail is 30 %. Hence 50 posts out of total 166 sanctioned posts of Assistant Superintendent Jail are reserved for promotion of (99) Chief Head Warder (BPS-11) under the existing ratio which are more than 50 % of the sanctioned strength of Chief Head Warder i-e 99 posts. Therefore the existing ratio is much more sufficient. In addition, the said cadre has capacity and competence issues. It is the prerogative of competent authority/government to increase, decrease and reserved quota for promotees and initial appointment. The appellants cannot claim increase in the quota reserved for promotees as his right.
9. Pertains to record.

OBJECTION ON GROUNDS:

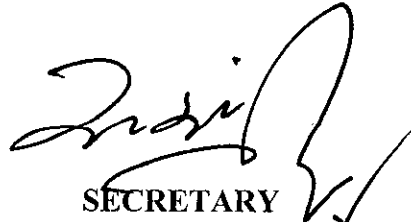
- A) Incorrect and not admitted. The Notification/rules issued vide dated 15/04/2022 by the competent authority are legal, justified based on facts and law and no discrimination has been committed by the authority.
- B) Incorrect and not admitted and the appellant are strictly dealt with accordance to law and rules.
- C) As elaborated in Para-B above.
- D) As elaborated in Para-B above.
- E) Detail is given in PARa-05 of the factual objections above.
- F) The appellant is fully treated in accordance with law, and prevailing rules hence no discrimination has been committed by the respondent department.
- G) As explained in Para-F above.
- H) As explained in Para-07 of the factual objections.
- I) As replied above.
- J) The respondents would also seek permission from this Honourable Tribunal to raise additional grounds/objections at the time of arguments.

Prayer:

It is therefore most humbly prayed that on the acceptance of instant reply on behalf of respondent No. 01 to 05 the instant service appeal may please graciously be dismissed being devoid of Merit & Law.



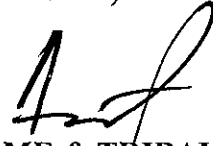
CHIEF SECRETARY
KHYBER PAKHTUNKHWA
(RESPONDENT # 1)



SECRETARY
ESTABLISHMENT DEPARTMENT
(RESPONDENT # 2)

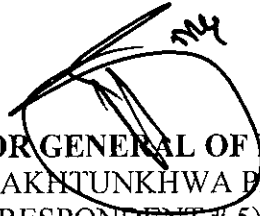


SECRETARY
FINANCE DEPARTMENT
(RESPONDENT # 3)



SECRETARY HOME & TRIBAL AFFAIRS
KHYBER PAKHTUNKHWA, PESHAWAR
(RESPONDENT # 4)

Home Secretary,
Khyber Pakhtunkhwa



INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR
(RESPONDENT # 5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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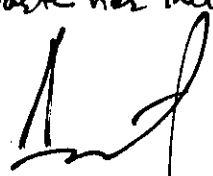
.....(Respondents)

COUNTER AFFIDAVIT ON BEHALF OF THE RESPONDENTS

No. 1 to 5.


We, the undersigned respondents do hereby solemnly affirm and declare that the contents of the Para-wise comments in the above cited appeal are true and correct to the best of our knowledge and belief that no material/ facts

have been kept concealed from this Honorable Service Tribunal. *It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off/cost.*


CHIEF SECRETARY ^{HS}
KHYBER PAKHTUNKHWA
(RESPONDENT # 1)

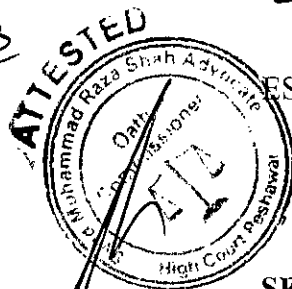

SECRETARY
ESTABLISHMENT DEPARTMENT
(RESPONDENT # 2)


SECRETARY
FINANCE DEPARTMENT
(RESPONDENT # 3)


SECRETARY HOME & TRIBAL AFFAIRS
KHYBER PAKHTUNKHWA, PESHAWAR
(RESPONDENT # 4)

Home Secretary,
Khyber Pakhtunkhwa


INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR
(RESPONDENT # 5)



EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P.III
G A Z E T T E

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, MONDAY, 25th APRIL, 2022.

GOVERNMENT OF KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

Peshawar, dated the 15th April, 2022.

No. SO(P&R)/1-33/2021. In exercise of the powers conferred by sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous notifications issued in this regard, the Home & Tribal Affairs Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions, applicable to post, born on the strength of the Inspectorate of Prisons Khyber Pakhtunkhwa, as specified in column No.2 of the attached appendix:

Atkes

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT

APPENDIX.

UPPER EXECUTIVE STAFF

1	2	3	4	5	6
SERIAL NO	NOMENCLATURE OF POST	MINIMUM QUALIFICATION FOR APPOINTMENT BY INITIAL RECRUITMENT OR BY TRANSFER	MINIMUM QUALIFICATION PRESCRIBED FOR PROMOTION	AGE LIMIT	METHOD OF RECRUITMENT
1.	Inspector General Prisons (BPS-20)				<p>By promotion, on the basis of selection on merit, from amongst the holders of the posts of Deputy Inspector General of Prisons, Commandants and Superintendents Central Prisons, with at least seventeen (17) years service in BPS-17 and above, who have successfully completed Senior Management Course:</p> <p>Provided that if no suitable officer is available for promotion then by transfer from PAS / PMS Officers.</p> <p>Note: For the purpose of promotion to the post of Inspector General of Prisons, a joint seniority list of Deputy Inspector General Prisons, Commandants and Superintendents Central Prisons shall be maintained.</p>

Atkes


KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th APRIL, 2022 1719

1	2	3	4	5	6
2.	Deputy Inspector General Prisons/ Commandant/ Superintendent Central Prisons (BPS-19)	---	-	-	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of the Assistant Inspector General Prisons, Deputy Commandants and Superintendents. District Jails. with at least twelve (12) years service in BPS-17 and above. who have passed departmental examination prescribed for Superintendent Jail Class-I:</p> <p>Provided that if no suitable officer is available for promotion then by transfer from PAS / PMS Officers.</p> <p>Note: For the purpose of promotion, to the posts of Deputy Inspector General Prison, Commandants and Superintendent Central Prison, a joint seniority of the Assistant Inspectors General Prisons, Deputy Commandants and Superintendents District Jail shall be maintained.</p>

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1	2	3	4	5	6
3.	Assistant Inspector General Prisons /Deputy Commandant/ Superintendent District Jail (BPS-18)	---	-	-	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Deputy Superintendents Jail, PSO to Commandant and Senior Instructors (Prisons Management), with at least five years service as such, and who have successfully qualified departmental examination prescribed for Superintendent Jail Class-II.</p> <p>Note: For the purpose of promotion to the post of Assistant Inspector General Prisons/Deputy Commandant/Superintendent District Jail, a joint seniority of Deputy Superintendents Jail/PSO to Commandant and Senior Instructors (Prisons Management) shall be maintained.</p>


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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th APRIL, 2022 1721

1	2	3	4	5	6
4.	Deputy Superintendent Jails/PSO to Commandant/ Senior Instructor (Prison Management) (BPS-17)	<p>(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University; and</p> <p>(b) Physical standard:</p> <p>(i) height 5 feet and 7 inches;</p> <p>(ii) chest 33x34 inches without expansion and 33x34^{1/2} with expansion.</p> <p>(iii) vision of eyes 6/6 without glasses;</p> <p>(iv) free from any kind of disability.</p>	-	21 To 30 Years	<p>(a) Seventy percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts Assistant Superintendents Jail and Assistant Superintendent Jail (Female), with at least five years service as such, subject to-</p> <p>(i) successful completion of promotion course prescribed for Deputy Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Deputy Superintendent Jail;</p> <p>(b) ten percent by initial recruitment through Public Service Commission from amongst the holders of the posts in service Assistant Superintendents Jail, who have atleast three years service and possess minimum qualification or eligibility criteria prescribed for initial recruitment as specified in column No.3; and</p> <p>(c) Twenty percent by initial recruitment.</p> <p>Note: For the purpose of promotion to the posts of Deputy Superintendent jails/PSO to commandant/Senior Instructor (Prison Management), a joint seniority of Assistant Superintendents Jail and Assistant Superintendent Jail (Female) shall be maintained.</p>

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1	2	3	4	5	6
5.	Assistant Superintendent Jail (BPS-16)	<p>(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University; and</p> <p>(b) Physical standard:</p> <p>(i) height 5 feet and 7 inches;</p> <p>(ii) chest 33x34 inches without expansion and 33x34 1/2 with expansion;</p> <p>(iii) vision of eyes 6/6 without glasses;</p> <p>(iv) free from any kind of disability.</p>	-	21 To 30 Years	<p>(a) Thirty percent by promotion, on the basis of seniority- cum-fitness, from amongst the holders of the posts of Chief Head Warders, having Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years service as Head Warder and Chief Head Warder, subject to-</p> <p>(i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail;</p> <p>(b) ten percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts in service Senior Clerks, who possess minimum qualification or eligibility criteria prescribed for initial recruitment, with at least five years service as Junior Clerk and Senior Clerk, subject to-</p> <p>(i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and</p> <p>(c) sixty percent by initial recruitment.</p>

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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th APRIL, 2022 1723

1	2	3	4	5	6
6.	Assistant Superintendent Jail (Female)(BPS-16)	(a) At least Second class Bachelor's Degree or its equivalent qualification from a recognized University; and (b) Physical standard: (i) height 5 feet & 01 inch; (ii) Vision of eyes 6/6 without glasses; and (iii). Free from any kind of disability.	-	21 To 30 Years	(a) Twenty five percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Chief Head Warders (Female), with Secondary School Certificate or its equivalent qualification from recognized Board, and at least five years service as Head Warder (Female) and Chief Head warder (Female), subject to- (i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and (ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and (b) seventy-five percent by initial recruitment;

WATCH AND WARD STAFF

1	2	3	4	5	6
7.	Chief Head Warder (BPS-11)	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Head warders, with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Chief Head Warder; (b) clearance of Departmental Professional Examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4. Note: Head Warders, who possess Middle pass qualification, are exempted from condition of clause (b) above.

Atkes

1	2	3	4	5	6
8.	Chief Head Warder (Female)(BPS-11)	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Head warders (Female), with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Chief Head Warder (Female); (b) clearance of departmental professional examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4. Note: Head Warders (Female), who possess Middle pass qualification, are exempted from condition of clause(b) above;
9.	Gate Keeper (BPS-11).	(i) Secondary School Certificate in Second Division from a recognized Board; and (ii) Ex-Junior Commissioned Officer from Armed /Paramilitary forces.	---	30 to 45 Years	By initial recruitment.

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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th APRIL, 2022 1725

1	2	3	4	5	6
10.	Head Warder (BPS-09).	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	---	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Warders, with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Head Warder. (b) Clearance of Departmental Professional Examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4. Note: Warders appointed prior to 04-11-2002, are exempted from condition of clause(b) above;
11.	Head Warder (Female) (BPS-09)	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Female Warders, with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Head Warder Female; (b) clearance of Departmental Professional Examination prescribed in their own cadre; and (c) possess minimum qualification as specified in column No.4. Note: Female Warders, appointed prior to 04-11-2002 are exempted from condition of clause (b), above.

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1	2	3	4	5	6
12.	Warder (BPS-07)	<p>For fresh candidates.</p> <p>(a) At least Secondary School Certificate, in Second Division or its equivalent qualification from a recognized Board;</p> <p>(b) for fresh candidates, with minimum physical standard-</p> <p>(i) height: 5 feet and 7 inches; and (ii) chest: 33x34 inches without expansion and 33x34 1/2 inches with expansion.</p> <p>For Ex-Uniform Personnel of Pakistan Armed Forces/Para-military forces.</p> <p>(a) at least Secondary School Certificate, or its equivalent qualification from recognized Board;</p> <p>(b) minimum physical standard-</p> <p>(i) height: 5 feet and 6 inches; and (ii) Chest: 32x33 inches without expansion and 32x33 1/2 inches with expansion.</p> <p>Note: All Candidates shall be-</p> <p>(i) Free from any kind of disability (ii) with vision of eyes 6/6 without glasses.</p>	-	<p>(a) For fresh candidates 18 to 30 years and-</p> <p>(b) For Ex-Uniform personnel of Pakistan Armed Forces/Para-Military Forces upto maximum 40 years</p>	<p>By initial recruitment: Provided that preference shall be given to Ex-Uniform Personnel of Pakistan Armed Forces i.e Army, Navy, Air Force, Marines (Combat Arms Services) and Ex-Para-military Forces i.e Defence Services Guards, Pakistan National Guards (Mujahid Force), Frontier Constabulary, Rangers, Frontier Corps, Gilgit Baltistan Scouts, Coast Guards, Baluchistan Scouts, Militia (Combat Arms Services) and Ex-Police personnel, retired from service within the last five years and not dismissed or retired from service on medical board grounds, having at least five years service at credit with discharge certificate, graded as "Satisfactory / Good / Exemplary.</p>

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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th APRIL, 2022 1727

1	2	3	4	5	6
13.	Warder (Female) (BPS-07)	(a) At least Secondary School certificate in Second division or its equivalent qualification from recognized Board; and. (b) Physical Standard: (i) height 5 feet & 1 Inch; (ii) vision of eyes 6/6 without glasses; and (iii) Free from any kind of disability		18 to 30 years	By initial recruitment.

MEDICAL & PARAMEDICAL STAFF					
1	2	3	4	5	6
14.	Principal Medical Officer (BPS-19)	---	--	-	By transfer from Health Department.
15	Senior Medical Officer (BPS-18)	---	--	-	By transfer from Health Department.
16	Surgical Specialist (BPS-18)	---	--	-	By transfer from Health Department.
17	Cardiologist Specialist (BPS-18)	---	--	-	By transfer from Health Department.
18	Physiotherapist (BPS-18)	---	--	-	By transfer from Health Department.
19	Psychiatrist (BPS-18)	---	--	-	By transfer from Health Department.

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1	2	3	4	5	6
20	Psychologist (BPS-17)	At least Second class Master's Degree in Psychology or its equivalent qualification from a recognized University.	--	21 to 35 Years	By Initial recruitment.
21	Medical Officer (BPS-17)	---	--	-	By transfer from Health Department.
22	Women Medical Officer (BPS-17)	----	--	-	By transfer from Health Department.
23	Dental Surgeon (BPS-17)	---	--	-	By transfer from Health Department.
24	Technologist (BPS-17)	At least Second Class Bachelor's Degree in the relevant Technology(Pharmacy/Pathology/ Dental/Surgical etc) from a recognized University/ Institution	-	20 to 32 Years	(a) Sixty percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Chief Technicians, with at least three years' service as such; and (b) Forty per cent by initial recruitment.
25	Chief Technician (BPS-16)	---	--	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Senior Technicians with at least two years service as such.
26	Senior Technician (BPS-16)	----	--	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Technicians , with at least five years service as Junior Technician and Technician.
27	Nurse (BPS-16)	---	--	-	By transfer from Health Department.
28	Female Nurse (BPS-16)	---	--	-	By transfer from Health Department

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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th APRIL, 2022 1729

1	2	3	4	5	6
29	Technician (BPS-14)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Junior Technicians , with at least three years service as such."
30	Junior Technician (BPS-12)	(a) At least Secondary School Certificate with Science in Second division or its equivalent qualification from recognized Board; and (b) A diploma from a recognized Institution in the relevant field duly enrolled with Khyber Pakhtunkhwa Medical Faculty.	-	18 to 30 Years	By initial recruitment.
31	Lady Health Visitor	---	-	-	By transfer from Health Department.

MINISTERIAL STAFF

1	2	3	4	5	6
32.	Deputy Director (BPS-18)	---	-	-	By promotion on the basis of seniority-cum-fitness, from amongst the holders of the posts of Assistant Directors, with at least five years service in BPS-17: Provided that if no suitable officer is available for promotion then by transfer.
33.	Assistant Director (BPS-17)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Superintendents and Budget and Accounts Officers, with at least three years service as such. Note:- For the purpose of promotion to the post of Assistant Director, a joint seniority list of Superintendents and Budget and Accounts Officers shall be maintained.


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1	2	3	4	5	6
34.	Superintendent/ Budget and Accounts Officer (BPS-17)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Assistants and Accountants, with at least 5 years service as such. Note:- For the purpose of promotion to the post of Superintendent/Budget and Accounts Officer, a joint seniority of Assistants and Accountants shall be maintained.
35.	Assistant/ Accountant (BPS-16)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University.	-	20 to 32 Years	(a) Seventy-five percent by promotion, on the basis of seniority-cum fitness, from amongst the holders of the posts of Senior Clerks and Assistant Accountants, with at least five years service as Junior Clerk and Senior Clerk or Assistant Accountant. Note: For the purpose of promotion to the post of Assistant/Accountant, a joint seniority of Senior Clerk and Assistant Accountant shall be maintained; and (b) Twenty- five percent by initial recruitment";
36.	Senior Clerk/ Assistant Accountant (BPS-14)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Junior Clerks, with at least two years service as such.

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37.	Junior Clerk (BPS-11)	(a) FA/F.Sc with Second Division or its equivalent qualification from a recognized Board; and (b) a speed of thirty (30) words per minute in typing in English on computer.	Matriculation or its equivalent qualification from a recognized Board.	18 to 30 Years	(a) Twenty five percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Restorers, Naib Qasids, Bahishtis/Water Carriers, Photostate Machine Operators, Tubewell Operators, Plumbers, Malis, Engine Men, Dhobis, Chowkidars, Pipe Fitters, Sweepers, including holders of other equivalent posts in the Department, with two years service as such, having qualification as specified in column No.3: Provided that if no suitable official is available for promotion then by initial recruitment; (b) twenty-five percent by initial recruitment from amongst Warders, who have at least five years service and possess minimum qualification prescribed for initial recruitment: Provided that :- (i) if two or more officials have acquired the F.A/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; and (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: Provided further that the condition F.A/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a), shall not apply till the expiration of a period as specified in the second proviso in column No.5, against Serial No.4 of the Establishment Department's Amending Notification No. SO(E&D)/1-35/2014, dated 18-07-2019, to the existing matriculate incumbents of the posts of Restorer, Naib Qasid, Bahishti / Water Carrier, Photostate Machine Operator, Tubewell Operator, Plumber, Mali, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper, including holders of other equivalent posts, for promotion to the post of Junior Clerk. <u>Note:</u> For the purpose of promotion, there shall be maintained a joint seniority list of Restorer, Naib Qasid, Bahishti/Water Carrier, , Photostate Machine Operator, Tubewell Operator, Plumber, Mali, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper etc; with reference to the dates of their acquiring the F.A /F.Sc or its equivalent qualification from a recognized Board; and (c) Fifty percent by initial recruitment.

Added


TRAINING STAFF

1	2	3	4	5	6
38.	Senior Instructor (BPS-17)	At least Second Class LLB or its equivalent qualification from a recognized University		21 to 35 Years	By initial recruitment;
39.	Senior Instructor (Criminology) (BPS-17)	At least Second Class Master's Degree or its equivalent qualification in Criminology from a recognized University.	-	21 to 35 Years	By initial recruitment;
40.	Senior Drill Instructor (BPS-16)	(a) Ex-Servicemen of Pakistan Army of the rank of Subedar or Naib Subedar, who is qualified from Pakistan Military Academy in Drill Course; and (b) qualified color service from Army.	-	40 to 50 Year	By initial recruitment".
41.	Senior Band Master (BPS-16)	Ex-Servicemen of Pakistan Army of the rank of Naib Subedar or Havaldar, who is qualified from Army School of Music as a Band Master.	-	40 to 50 years	By initial recruitment".
42.	Instructor (BPS-14)		-		By promotion, on the basis of seniority-cum-fitness from amongst the holders of the posts of Drill Instructors, with at least three years service as such.
43	Junior Physical Training Instructor (BPS-11)	Ex-Servicemen of Pakistan Army of the rank of Naib Subedar or Havaldar who has qualified PET course from Army School of Physical Training Abbottabad.	-	40 to 50 years	By initial recruitment.
44	Drill Instructors (BPS-11)	Qualified Drill Instructor from Armed/ Para-military Forces, with Secondary School Certificate or its equivalent qualification from a recognized Board.	-	30 to 45 Years	By initial recruitment through open merit.
45	Junior Weapon Instructor (BPS-11)	Ex-Servicemen of Pakistan Army of the rank of Naib Subedar or Havaldar, who has qualified from School of Infantry and Tactics or any other, recognized Institution.	-	40 to 50 years	By initial recruitment.

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1	2	3	4	5	6
46	Assistant-Sub Inspector (BPS-11)	(a) Ex-Junior Commissioned Officer of Army at the rank of Subedar or Naib Subedar, preferably SSG qualified; and (b) Medical category-A.	-	40 to 50 years.	By initial recruitment.
47	Head Constable (BPS-09)	(a) Ex-Non Commissioned Officer of Pakistan Army of the rank of Havaldar; and (b) Medical category-A.	-	40 to 50 years.	By initial recruitment.
48	Constable (BPS-07)	---	-	---	By transfer of Jail Warders preferably ex-servicemen.
49	Band Master (BPS-07)	Qualified Band Master from Armed/ Para-military Forces, with Secondary School Certificate or its equivalent qualification from a recognized Board.	-	30 to 45 Years	By initial recruitment through open merit.
IT CADRE STAFF					
1	2	3	4	5	6
50	Network Administrator/ Computer Programmer/ Database Administrator (BPS-17)	---	---	---	By Promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Assistant Programmers, Assistant Network Administrators, Assistant Database Administrators, Network Engineers and Computer Operators, with at least five years service as such. Note: For the purpose of promotion, a joint seniority list of Assistant Programmers, Assistant Network Administrators, Assistant Database Administrators, Network Engineers and Computer Operators shall be maintained

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1	2	3	4	5	6
51	Assistant Programmer (BPS-16)	At least Second Class Master's Degree in Computer Science or four years Bachelor's Degree in Information Technology or its equivalent qualification from a recognized University	-	22 to 32 years	By initial recruitment.
52.	Assistant Network Administrator (BPS-16)	(a) At least second Class Master's Degree in Computer Science or Information Technology or four year Bachelor Degree in Computer Science; or its equivalent qualification from a recognized university; and (b) two years post qualification experience in latest version networking design, development of networks and strong solutions in open source and windows environment.	-	22 to 32 years	By initial recruitment
53	Assistant Database Administrator (BPS-16)	(a) Second Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years), from a recognized University; or (a) Second Class Bachelor's Degree from a recognized University with one year Diploma in information Technology from a recognized Board of Technical Education.	-	22 to 32 years.	By initial recruitment.
54	Network Engineer (BPS-16)	Atleast Second Class Bachelor's Degree in Computer Science (BCS,BSCS,BE(CE), BS(IT) and MCS or its equivalent qualification from a recognized University. Note: Preference shall be given to those having certificate in Computer Networking like MCSE/CCNA/ any other latest certification in Networks from recognized Institute.	-	22 to 32 years.	By initial recruitment.
55	Computer Operator (BPS-16)	(a) Second Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years), from a recognized University; (b) Second class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.	-	22 to 32 years	By initial recruitment.

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1	2	3	4	5	6
56	Stenographer (BPS-16)	(a) At least Second Class Bachelor's Degree, or its equivalent qualification from a recognized University; (b) a Speed of seventy words per minute in shorthand in English and forty-five words per minute in typing; and (c) Knowledge of computer in using MS Word, MS Excel.	-	20 to 32 years.	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of steno-typist and Junior Scale Stenographers, with at least five years service as such; and Note: For the purpose of promotion, a joint seniority list of Steno-typists and Junior scale stenographers (BPS-14) shall be maintained. (b) Fifty percent by initial recruitment.
57	Steno-Typist/ Junior Scale Stenographer (BPS-14)	(a) Intermediate or its equivalent qualification from a recognized Board; (b) a Speed of fifty words per minute in shorthand in English and thirty-five words per minute in typing; and (c) Knowledge of Computer in using MS-Word, MS-Excel".	-	18 to 30 Years	By initial recruitment
TEACHING STAFF					
1	2	3	4	5	6
58.	Senior English Teacher (BPS-16)	BA/BSc with B.Ed or its equivalent qualification from a recognized university.	-	21 to 35 years.	By initial recruitment.
59.	Librarian (BPS-16)	At least Second class Master's Degree in Library Science or its equivalent qualification from a recognized University.	-	21 to 35 years.	By initial recruitment.
60.	Senior Vernacular Teacher (BPS-15)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized university with Certified Teacher Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education from a recognized Board.	-	18 to 35 Years	By initial recruitment from respective District.

Added

1	2	3	4	5	6
61.	Religious Teacher (BPS-15)	(a) At least Second Division Secondary School Certificate from a recognized Board, with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh, Swat, Darul Uloom Chitral, Darul Uloom Darosh, Chitral and any other Government run Darul Uloom, as notified by Government from time to time; or (b) Second Class Master's Degree in Islamiyat from a recognized University.	-	20 to 35 Years	By initial recruitment from respective District.
62.	Certified Teacher (BPS-15)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized university with Certified Teacher Certificate or two years Associate Degree in Education from a recognized university or eighteen months Diploma in Education from a recognized Board.	-	18 to 35 Years	By initial recruitment from respective District.
63	Junior Vernacular Teacher (BPS-12)	(a) At least Second Division Intermediate or its equivalent qualification, from a recognized Board, with Primary School Teacher Certificate or Diploma in Education from a recognized Institute; or (b) at least Second Division Secondary School Certificate from a recognized Board, with two years Associate Degree in Education from a recognized University.	-	18 to 35 Years	By initial recruitment from respective District.
64	Primary School Teacher (BPS-12)	(a) At least Second Division Intermediate or its equivalent qualification, from a recognized Board, with Primary School Teacher Certificate or Diploma in Education from a recognized Institute; or (b) At least Second Division Secondary School Certificate from a recognized Board, with two years Associate Degree in Education from a recognized University.	-	18 to 35 Years	By initial recruitment from respective District
TECHNICAL STAFF					
1	2	3	4	5	6
65	Law Officer (BPS-17)	(a) At least Second Class LLB or its equivalent qualification from a recognized University; and (b) at least two year experience as practicing registered lawyer.	-	25 to 35 Years	By initial recruitment.
66	Physical Training Instructor (BPS-15)	At least Second Class Bachelor's Degree from a recognized university, with one year Junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	-	18 to 35 Years	By initial recruitment from respective District.

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1	2	3	4	5	6
67	Instructor (Tailoring) (BPS-14)	(a) Diploma in relevant field from a Government Polytechnic Institute / College of Technology with two years experience in the relevant field; or; (b) Secondary School Certificate with trade proficiency certificate in the relevant trade from a Government Technical Training Centre / Apprenticeship Training Centre or a recognized institute, with five years practical experience with relevant trade.	-	21 to 30 Years	By initial recruitment.
68	Instructor (Electrician) (BPS-14)	(a) Diploma in relevant field from a Government Polytechnic Institute / College of Technology, with two years experience in the relevant field; or; (b) Secondary School Certificate with trade proficiency certificate in the relevant trade from a Government Technical Training Centre / Apprenticeship Training Centre or a recognized institute, with five years practical experience with relevant trade.	-	21 to 30 Years	By initial recruitment.
69	Armourer (BPS-07)	Qualified Armourer from Armed/ Para-military Forces with Secondary School Certificate or its equivalent qualification from a recognized Board	-	30 to 45 Years	By initial recruitment through open merit.
70	Driver (BPS-06)	Computerized driving license for L.T.V/H.T.V.	-	18 to 30 Years	By initial recruitment.
71	Mason (BPS-05)	Knowledge in masonry	-	18 to 30 Years	By initial recruitment after practical tests.
72	Tailor Master (BPS-05)	Skill in cutting and tailoring	-	18 to 30 Years	By initial recruitment
73	Carpenter (BPS-05)	Skilled in carpentry	-	18 to 30 Years	By initial recruitment
74	Weaving Master (BPS-05)	Certificate of skill in line	-	18 to 30 Years	By initial recruitment
75	Motor Mechanic (BPS-05)	A certificate of skill in line	-	18 to 30 Years	By initial recruitment.

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1	2	3	4	5	6
76	Lady Embroider (BPS-05)	Qualified in Embroidery and Weaving work from a recognized Institution	-	18 to 30 Years	By initial recruitment
77	Photostat Machine Operator (BPS-05)	At least Secondary School Certificate in Second Division or its equivalent qualification from a recognized board, with sufficient experience in operating and maintenance of photostate-machine and other office equipment.	-	18 to 40 Years	By initial recruitment from the respective District.
78	Electrician (BPS-05)	(a)At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board; and (b)Diploma in Electrical Technology from a recognized Technical Board.	-	18 to 30 Years	By initial recruitment.
CLASS-IV STAFF					
1	2	3	4	5	6
79	Tube Well Operator (BPS-05)	Preferably literate.	-	18 to 40 Years	By initial recruitment from the respective Districts.
80	Engine Man (BPS-03)	Qualified Boiler	-	18 to 40 Years	By initial recruitment.
81	Cook (BPS-03)	Literate having expertise in relevant field.	-	18 to 40 Years	By initial recruitment.
82	Waiter / Bearer (BPS-03)	Literate having expertise in relevant field.	-	18 to 40 Years	By initial recruitment.
83	Restorer (BPS-03)	Middle pass	-	18 to 40 Years	By initial recruitment.
84	Mali (BPS-03)	Expert in gardening	-	18 to 40 Years	By initial recruitment
85	Bahishti/Water Carrier (BPS-03)	Primary Pass	-	18 to 40 Years	By initial recruitment
86	Naib Qasid (BPS-03)	Primary Pass	-	18 to 40 Years	By initial recruitment
87	Chowkidar (BPS-03)	-----	-	18 to 40 Years	By initial recruitment

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1	2	3	4	5	6
88	Sweeper (BPS-03)		-	18 to 40 Years	By initial recruitment
89	Plumber (BPS-03)	Preferably Literate	-	18 to 40 Years	By initial recruitment from the respective Districts.
90	Barber (BPS-03)	Preferably Literate and skilled in the relevant trade	-	18 to 40 Years	By initial recruitment from the respective Districts.
91	Baker (BPS-03)	Preferably Literate and skilled in the relevant trade	-	18 to 40 Years	By initial recruitment from the respective Districts.
92	Dhobi (BPS-03)	Preferably Literate and skilled in the relevant trade	-	18 to 40 Years	By initial recruitment from the respective Districts.
93	Attendant (BPS-03)	Preferably Literate	-	18 to 40 Years	By initial recruitment from the respective Districts.
94	Female Attendant (BPS-03)	Preferably Literate	-	18 to 40 Years	By initial recruitment from the respective Districts.
95	Executioner (BPS-03)	Young energetic literate persons.	-	18 to 40 Years	By initial recruitment from the respective Districts.
96	Piper (BPS-03)	Having practical skill in the relevant field.	-	18 to 40 Years	By initial recruitment.
97	Drummer (BPS-03)	Having practical skill in the relevant field.	-	18 to 40 Years	By initial recruitment.
98	Pipe Fitter (BPS-03)	Qualified in pipe fitting	-	18 to 40 Years	By initial recruitment. after practical test.

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OFFICE OF THE
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
☎ 091-9210334, 9210406 📠 091-9213445

No. _____

Dated _____

AUTHORITY LETTER

Mr.Sulaiman, Law Officer(BPS-17) attached to the office of Inspector General of Prisons Khyber Pakhtunkhwa Peshawar is hereby authorized to make affidavit, to file comments/reply/report and to attend the Lower Courts, Ombudsperson, Khyber Pakhtunkhwa Service Tribunal, Peshawar High Court Peshawar, Supreme Court of Pakistan Islamabad, Federal Shariat Court, meeting of scrutiny committee at Law Department and also to attend the office of Advocate General Khyber Pakhtunkhwa at Peshawar on each and every date of hearing, on behalf of the Inspector General of Prisons Khyber Pakhtunkhwa .


**INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**