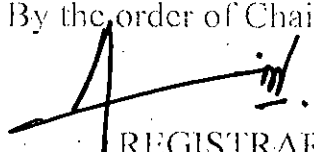


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2072/2023

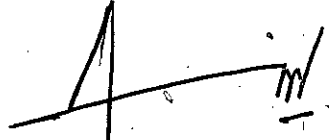
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/10/2023	<p>The appeal of Mr. Shakeel Ahmad resubmitted today by Mr. Shumail Ahmad Bhatt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Shakel Ahmad SP Training CPC Peshawar received today i.e. on 12.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days:

- 1- Annexure-A/I is not attached with the appeal.
- 2- Copy of Seniority list mentioned in para-16 of the memo of appeal (Annexure-I) is not attached with the appeal.
- 3- Affidavit is not is not attested by the Oath Commissioner.
- ④ Page- 19, 26, 27, 70 to 73, 75, 80, 81, 82, 84, 88 to 94, 102, 103 and 104 of the appeal are illegible which may be replaced by legible/better one.

No. 3413 /S.T.

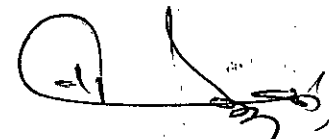
Dt. 16/10 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shumail Ahmad Butt Adv.
High Court Peshawar.

Respected Sir.

Resubmitted objection No 1 & 3 is removed from the appeal whereas objection No 2 is irrelevant moreover better copy of 26, 27 is provided it is also pertinent to mention here that the same pages are already filed before this honorable Court vide S.A. 1771-P/2023 and this appeal is also in compliance of the Court order dated 19.09.2023


Hameed Khan
Att'.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 2072/2023

Shakil Ahmed

VERSUS

Government of Khyber Pakhtunkhwa *et al*

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Appellant

Through

Shumail Ahmad Butt,
Advocate Supreme Court of Pakistan

Abdul Rahim Khan Jadon,
And
Hazrat Bilal,
Advocates (High Courts)
Cell# 03339151532

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 2072 /2023

1. Shakil Ahmed
SP Training, CPO Peshawar

..... Appellant

Versus

1. Govt of Khyber Pakhtunkhwa
Through Chief Secretary,
KP Civil Secretariate Peshawar
2. Inspector General of Police,
CPO Police Lines Peshawar
3. Capital Police Officer,
CPO Police Lines Peshawar
4. Commandant FRP
Peshawar

..... Respondents

SERVICE APPEAL UNDER SECTION-4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT,
1974 AGAINST THE IMPUGNED LETTER DATED
11.03.2023, 12.03.2023 AND OFFICE ORDERS OF
DEMOTION DATED 16.03.2023 AND ANY
SUBSEQUENT PROCEEDINGS OR ORDERS
EMANATING/ARISING THEREFROM AND IN THE
LIGHT OF JUDGMENT OF PESHAWAR HIGH COURT
PESHAWAR IN THE WRIT PETITION W.P # 1289-P OF
2023 DATED 29.08.2023.

May it please this honorable Tribunal:

The Appellant very earnestly craves permission to plead his case and seeks for the solace of his grievance from this Honorable Court, as follows:

Facts leading to this Appeal:

2

1. That the Appellant is a law-abiding citizen of Pakistan and have every legal and constitutional rights duly protected under law of the land. It is worth placing on record that since his appointment, Appellant have not given a chance of even a minor complaint to his high ups and since then he's performing his duties with zeal and dedication.
2. That the Appellant initially appointed in FRP Police Department as Constable on 27.04.1995 thereafter as prescribed by rules, the Appellant qualified the A-1 and B-2 Exams on 14.01.1999 and 02.04.2001 respectively which are pre-conditions for the Lower School Course and the Appellant was promoted to the rank of HC (Head Constable) on 14.12.2001 vide Order No. 6531-40/OSI dated 16.09.2004 dully approved and signed by the hand of Commandant FRP Police Khyber Pakhtunkhwa.
(Copy of the Appointment letter is Annexure "A")
3. That before reporting the facts of the Appellant it would be pertinent to make it clear that according to Para-5 of Standing Order No.01/2006 i.e.

"Criteria for promotion to the rank of ASI

(As the nature of duties of ASI's is that of staff Office, thereafter, those C-1 head Constable who have completed their tenure in the rank of HC may be promoted to the rank of ASI for a period of two years, if the Commandant FRP, intends to grant extension beyond two years. The officer be reverted and promoted again for further period of two years so Police rules 13-18 is not Violated, however, further extension may not be granted)"

4. That in the year 2009, after skimming of the service record and performance the Appellant was selected for the Intermediate College Course by the Commandant FRP Police, Khyber Pakhtunkhwa which was successfully completed by the Appellant whereafter the appellant was promoted to the Rank of officiating Sub-Inspector vide office Order No.673-77/EC dated 29.01.2009.

- 3
5. That subsequently the Appellant was confirmed to the rank of ASI vide order No. 5590-91/EC dated 30.07.2010 and was placed on "E" list with effect from 01.07.2010 as per Police Rules 13.18. Thereafter once again after scanning of the service record and performance, the Appellant was selected for the Upper College Course vide Order No. 9675-86 dated 01.10.2011 with effect from 01.10.2011 at Police Training College, Hangu and qualified the same successfully.
 6. That it is worth placing on record that the competent authorities confirmed the colleagues of the Appellant in the rank of Sub-Inspector and denied the Confirmation of Appellant vide CPO letter No.21538/E-II dated 12.11.2012.
 7. That while felt aggrieved from the *ibid* order, the Appellant assailed the same before this honorable Service Tribunal vide Service Appeal No. 1264/2012 which was accepted by this honorable Service Tribunal on 31.01.2013. The operating para of the judgment is reproduced for facility of ease as follow.

"In view of the above, the Appeal is accepted the Impugned Order is set aside and the Respondent is directed to confirm the appellant as Sub- Inspector W.e.f 01.07.2010 as per rule 13.18 of Police Rules 1934. Parties are left to bear their own cost, file be consigned to the record."

8. That on other hand the AIG-LEGAL on behalf of PPO wrote a letter No.482-83/legal dated 04.03.2013 to Secretary Home & T.As for placing the matter before law department and to seek their concurrence for filing of CPLA before the Apex Supreme Court of Pakistan. Subsequently the matter was placed before the Scrutiny Committee which was headed by the worthy Secretary law in its meeting held on 22.03.2013 which was attended by the then (I) Additional Advocate General Mr. Ial Jan Khattak (II) S.O (Court) Home & T.As Deptt. Mr. Usman Zaman (III) DSP Legal, CPO. Mian Imtiaz Gul (IV) Dy Solicitor, Law Deptt. Mr. Shakeel Asghar. Decision of the meeting is reproduced herein below as follows:

"when the case came up for discussion before the Committee an after threadbare discussion it was decided with consensus that it was not a fit case for filling of CPLA in the Supreme Court of Pakistan due to following reasons;

That there was nothing on record to show that appellant was incapable and intentionally avoiding posting as SHO, rather it was the discretion of department authority to post him (Appellant) as SHO for which appellant cannot be held responsible. (4)

Hence it was decided with Consensus that depriving appellant of his due right without any convincing grounds was not justifiable in law and such kind of attitude always discourage by the Superior Courts."

The *ibid* decision of the Scrutiny Committee was communicated to Secretary Home & T.As vide Letter No. Lit/LD/9-13(12)Home/2013/4569-73 dated 26.03.2013 and routed the same to AIG (Legal) Vide Covering letter No. S.O(Courts)/HD/6-1/Misc/13 dated 26.03.2013. The judgment of the Honorable Service Tribunal thus attained finality and cannot be later disturbed or overturned in garb of lame excuses or pretexts.

(Copy of the excerpt of the minutes of the meeting dated 22/03/2013 annexed as Annexure "B")

9. That, based on the *ibid* letter, AIG/Legal made a request on behalf of PPO to the Commandant Frontier Reserve Police (FRP) Khyber on 27.03.2013 vide letter No. 724/Legal wherein they have requested for implementation of the Judgment so rendered by this honorable Service Tribunal.

(Copy of the AIG/Legal request to Commandant FRP is Annexed as Annexure "C")

10. That resultantly the competent authority i.e. Commandant FRP vide notification No 2291/EC dated 28.03.2013 has complied with the *ibid* Judgment dated 31.01.2013 of this honorable Service Tribunal and confirmed the Appellant (Shakeel Ahmad No.175) in the rank of Sub-Inspector w.e.f 01.07.2010. Thereafter another Notification No.2802-3/EC dated 18.04.2013 was issued wherein the Appellant was allotted with new number P/01.

(Copy of compliance by Commandment FRP dated 28.03.2013 is annexed as Annexure "D")

(Copy of the allotment of new number is Annexed as Annexure "E")

11. That afterwards vide letter No 2315/E dated 29.03.2013 the Appellant was recommended for promotion to List "F" wherein it was further stated that the

Appellant name be placed in list "F" w.e.f 01.07.2010 as per the judgment of this honorable Tribunal. Resultantly meeting of DPC was conducted on 06.05.2013 under the chairmanship of (I) Mr. Khalid Masood, Addl; I.G of Police HQ's (II) Mr. Awal Khan, Deputy I.G of Police, HQ's (III) Mr. Asif Zafar Cheema, Deputy I.G of Police, Investigation/HQrs (IV) Mr. Muhammad Fayaz Khan, Assistant I.G.P of Police, Legal, CPO Peshawar who have considered the ibid recommendation and the same was notified vide notification No. 10764/E-II dated 09.05.2013

(Copy of the recommendation 29.03.2013 is annexed as Annexure "F")

(Copy of the DPC 06.05.2013 meeting and subsequent Notification 09.05.2013 are annexed as Annexure "G")

12. That AIG/Establishment for PPO vide letter No.370-90/E-II dated 09.05.2014 has issued the Seniority List of Inspector/Sub-Inspector on List "F" of Khyber Pakhtunkhwa wherein the Appellant name is reflected at S.No. "75" of the list.

(Copy of the seniority list is annexed as Annexure "H")

13. That after the issuance of the ibid list, the appellant took a sigh of relief but most unfortunately once again the seniority of the Appellant was disturbed by Respondents against which the Appellant submitted applications for the correction in the said list on dated 31.01.2017 & 09.08.2017 whereafter the appellant waited for considerable length of time but the Respondents haven't passed any order thus the appellant while had no other option but to assail the same before this honorable Tribunal thus the aforesaid act of Respondents was challenged vide Service Appeal No. 626/2018 before this honorable Forum for solace of his grievance, which was allowed vide judgment and order dated 13.02.2019 wherein it was held as follows:

"In view of the above, the appeal in hand is allowed in terms that the appellant be extended all back benefits including his original position in seniority as stood before his compulsory retirement also provide through order dated 07.08.2017 passed by Respondent No.2. He shall also be entitled for consideration for promotion in accordance with law."

14. That the Respondents while felt aggrieved of the Judgment and Order dated 13.02.2019 of this honorable Forum preferred to file CPLA before the Apex Supreme Court of Pakistan and the SP/Court & Litigation on behalf of PPO vide letter No 767/legal/CPO dated 18.02.2019 requested the worthy Secretary Home & TAs to approach the Law Department for lodging CPLA before the Honorable Supreme

Court of Pakistan against the judgment of this honorable Forum supra mentioned. when the C.P 223-P of 2019 came up for hearing before Honorable Supreme Court of Pakistan on 09.10.2020 the Honorable Supreme Court of Pakistan passed an order for dismissed as withdrawn. Thus the Judgment of the Tribunal 13.02.2019 also attained finality and is now beyond reproach. (6)

15. That in the meantime on 01.07.2019 the Departmental Selection Committee was held at Conference Room-II of CPO, Peshawar wherein the worthy DSC has considered the Appellant case for promotion and recommended him for promotion as follows:

I. Insp; Shakeel Ahmad is recommended for confirmation in the rank of inspector w.e.f 01.07.2012. His seniority may be fixed along with his colleagues.

II. Promotion case of Inspector Shakeel Ahmad to the rank of DSP will be considered after Qualifying Advance Course. Advance Course is requirement of Police Rules 13-16(A), while cannot be exempted.

III. The two (02) years period spent in FRP in the rank of inspector shall be considered as mandatory period as specified in the Standing Order No.21/2014 and amended Police Rules 13-16(A)

IV. Promotion to the rank of DSP is subject to mandatory period spent which the applicant has already done. However, Qualification of Advance Course is left for which the name of applicant may be recommended in the immediate course”

16. That in compliance to the Judgment of this Honorable Service Tribunal Khyber Pakhtunkhwa, the Appellant was confirmed in the rank of Inspector W.e.f 01.07.2012 and placed in seniority list of inspectors at serial No.02 below the name of inspector Said khan No. K/221 vide Notification No. CPO/E-II/Confirmation dated 27.08.2019.

(Copy of seniority list annexed as Annexure “I”)

17. That thereafter the Appellant was nominated along with many others for 10th Advance Course vide letter No. 5308/Trg dated 05.07.2019. Resultantly the appellant attended the advance course and qualified the same successfully with flying colors. Thereafter the Appellant was promoted to the post of DSP (BPS-17) vide Notification No. CPO/E-I/Promotion/1723 dated 30.12.2019 by the then IGP Khyber Pakhtunkhwa

and Appellant was placed in seniority of DSP at S.No 120 issued Vide No.840/SE-I dated 30.04.2020.

(7)

18. That since his justified promotion the appellant kept performing his duties with zeal and dedication but to the utmost dismay of the appellant his seniority was once again revised vide No.1355/SE-I dated 28.06.2022 wherein the Appellant was placed on S.No. 184 without any cogent and justified reason which act on part of the Respondents is once again sheer violation of the rules etc.

(Copy of revised seniority list annexed as Annexure "J")

19. That, in the meantime, Appellant was selected for 7th Junior Command Course vide letter No.8769/Trg dated 09.11.2021 but dropped from the said course due to some official assignment however later IGP vide letter dated 05.07.2022 has sought for information regarding the status of the Appellant. In response whereof the Commandant FRP has furnished his reply vide letter No. 5570/EC dated 07.07.2022 and has categorically confirmed the status of the Appellant that his case does not fall in that of "out of turn" whereafter he was nominated for 8th Junior Common Course vide CPO letter No. 12347/Trg dated 24.10.2022.

(Copy of 8th Junior Common Course letter No. 12347/Trg dated 24.10.2022 as Annexure "K")

(Copy of reply vide letter No. 5570/EC dated 07.07.2022 is annexed as Annexure "L")

(copy of 7th Junior Command Course vide letter No.8769/Trg dated 09.11.2021 is annexed as annexure "M")

20. That it is pertinent to place on record that earlier in response to CPO letter No. CPO/CPB/472 dated 10.12.2021. the commandant FRP has replied that "before the promulgation of standing Order No.01/2014 FRP has its own hierarchy in seniority, promotion in the lower ranks and allotted quota seats for selection of various like distt; police by the competent authority. The promotion list A,B,C,D and E were also maintained according to Police Rules in the office of Commandant FRP KP. The eligible and qualified officials promoted step by step on the sanction strengths seats.

21. That it is also important to place on record that CCPO Peshawar has also declared thrice vide letter No. 4521/EC-I dated 26.11.2021, No. 7434/EC-I dated 13.04.2022 & 4649/EC-I dated 12.03.2023 that Appellant has never served under CCPO Peshawar. In addition, AIG legal CPO vid his office letter No. 11529/legal dated 08.12.2021 has stated that since establishment of FAR renamed as FRP, it has own hierarchy in seniority, promotion in the junior ranks. Selection for course on quota of seats of different courses to the said organization allotted by the Competent Authority and seniority of promotions lists ABCD & E were also maintained like district Police till Promulgation of standing Order No.01/2014 FRP.

(Copy letter No. 4521/EC-I dated 26.11.2021 is annexed as Annexure "O")

(Copy of letter No. 7434/EC-I dated 13.04.2022 is annexed as Annexure "P")

(Copy of letter No 4649/EC-I dated 12.03.2023 is annexed as Annexure "Q")

(Copy of the letter No.11529/legal dated 08.12.2021 ia annexed as annexure "R")

22. That at the cost of repetition it is submitted before this honorable Tribunal that since initial appointment of the Appellant, he was at FRP (Frontier Reserve Police), where there is no case of Gallantry, cadetship, out of turn promotion, etc, because each and every aspect of the FRP(Frontier Reserve Police), as per history given below, differs the case of Appellant from those who are hit by the Judgment of the Honorable Apex Court passed in out of turn Promotion cases.

23. That Archival background is that, In the year 1988, the Homes & Tribal Affair Department created as force Armed Reserve Police Force (ARP), which consisted of the Following Units

- i. Additional Police.
- ii. Special Police Levy
- iii. PAF Contingent
- iv. Range Reserve Force
- v. Provincial Reserve Armed Platoons
- vi. Frontier Armed Reserve
- vii. Campus Peace Corps UOP
- viii. STF & ATS
- ix. Mounted Police
- x. Standing Guards & Police Escorts.

In Para-5 of the memo it was clarified as follows:

"duties and responsibilities of the new set-up will be the same as those of Regular Police elsewhere and service will be governed by the Police Rules or any other Rules applicable to their counterparts in Regular Police."

9

(Copy of Memo Dated 16.01.1988 is Annexure "S")

24. That on 13.03.1988, a Standing Order No 2 of 1988 was issued, wherein the Campus Peace Corp and special police levy along with all arms, ammunition, transport etc were placed under the administrative control the Commandant Frontier Armed Reserve (FAR).

(Copy of the Standing order is Annexure "T")

25. That on 27.02.1991, the Frontier Armed Reserve (FAR) was re-named as Frontier Reserve Police (FRP), by the then I.G KPK and since then this wing of Police Force is continuing as FRP.

(Copy of the IGP's Order is Annexure "U")

26. That on 28.08.1993, a proper Recruitment Policy was issued for the recruitment against newly created posts in the Police Department; wherein the Posts in a Distt; was to be dealt as, *"The Newly created posts of a Distt: Should be filled up from the trained personals of FRP according to seniority, educational qualifications and domicile. The Vacancies Resulting from transfer of FRP Personnel to Distt; Police should be filled up through fresh recruitment in FRP & personnel selected for transfer to Distt: should be allocated to the Distt: of their domicile according to the number of vacancies available in each Distt:"*

(Copy of Recruitment policy is Annexure "V")

27. That to streamline the FRP further, a FRP Standing Order No.1 of 1994 was issued in the year 1994, wherein it was clarified that Police Act 1861 & Police Rules, 1934 or any other Rules and Laws for the Police Officers will be applicable to FRP and the duties and responsibilities of the FRP will be same as that of Regular Police. Similarly, FRP Standing Order No. 2 of 1994 was issued on 31.07.1994, whereby enrolment in FRP was further streamlined and quota for the training in the lower School, intermediate and Upper College was to be fixed by the IGP keeping in view the strength and to cover the promotion of the illiterate staff or failed in promotion lists, a FRP Standing

Order No 3 of 1994 was issued in August, 1994. The Standing Order No 3 is not related to the Petitioners.

(Copies of the Standing Orders are Annexure "W" "X" & "Y")

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28. That thereafter, on 19.06.1996, proper seats were allocated to the FRP Personals for the first time for the Lower, intermediate and Upper Courses and the Appellant on their due turn qualifies the said courses and none of them sent to the training by passing any senior eligible colleague

(Copy of seat allocation is annexure "Z")

29. That in the year, 2007 a dispute has arisen whereby the FRP was again declared as a Transit force and that no Constable and head constable can be admitted to D List. That Appellant's colleagues challenged that order in the Peshawar High Court in WP Nos. 1615/2007, 1616/2007 & 1617/2007. These writ petitions were finally heard on 20.03.2008 and the august High Court was kind enough to hold that the FRP is not a Transit Force and the Appellant could not be made junior to the juniors by washing away their more than a decades service in FRP and the case was remitted back to the Police Department to reconsider the matter so that no one be discriminated and deprived from legal rights.

(Copies of order dated 16.02.2007 and judgment dated 20.03.2008 are Annexure "Z-A" & "Z-B" Respectively)

30. That after the Judgment of the August Court dated 20.03.2008, the matter of the FRP personnel was placed before the Committee on 14.05.2008 and the issue was further entrusted to another Committee comprised of DIG Investigation, AIG Legal and Registrar CPO. The said constituted committee considered the issue and submitted its recommendations to the DSC which was convened on 07.05.2009 and the recommendations of the Committee were approved. The Committee recommended as, *"The Earlier decision dated 16.02.2007 should not be applied retrospective and all officials of the FRP be given permanent status and may be confirmed in their rank with their colleagues after completing their probation period as per PR 13-18. The benefits received by the officials in the FRP till the decision of DPC and their repatriation to the Distt of their domicile be kept intact so that they should not be deprived of any right as per decision of the Court. Literate officials may be treated as per Police Rules, 1934 and their seniority be fixed in each list on the basis of course undergone and criteria fixed under Police Rules Chapter-13"*

(Copies of minutes of the DSC are Annexure "Z-C" & "Z-D" respectively)

31. That after the above decision of DSC, the issue was settled once and for all and the FRP officials (amongst each other) upon repatriation to their Distt; of Domicile, were placed in list D & E with their colleagues of training session in bottom in seniority. While some officials remained posted in FRP and were placed in list A,B,C,D or E according to seniority. Thereafter, the Appellant passed out from his other courses on his turn with their colleagues and got further promotions up to the rank of Inspector & DSP on CPO level. It is once again reiterated that the Appellant was never ever an out of turn promotee, or cadet or promoted on Gallantry services basis in the FRP. (11)

32. That since it was brought into the knowledge of the Appellant that Respondents have issued circulars for reverting the rightful officials under the garb of the apex Court's judgment, against which the Appellant had no remedy but to approach honorable Peshawar High Court while invoking under their writ jurisdiction vide Writ Petition No. 1124-P/2023 which got fixed for first hearing on 30.03.2023.

33. That in the meantime it has been brought into the knowledge of the Appellant that Respondents have proceeded and issued Letters dated 11.03.2023 wherein it was directed that personal hearings be conducted on the very next date i.e. 12.03.2023 of all the concerned police officials in the Khyber Pakhtunkhwa Police Department (including the Appellant) in a misguided attempt to usurp the rights of the Appellant.

(Copy of the Letter dated 11.03.2023 is Annexure "Z-E")

34. That, subsequently, without affording proper opportunity of hearing and on the basis of a sham, frivolous and fabricated hearings/proceedings conducted of police officials in the Khyber Pakhtunkhwa Police Department across the province in one day, the Respondents issued Letter No. 993/Legal dated 12.03.2023 whereby it was illegally directed that the demotion process of police officials in the Khyber Pakhtunkhwa Police Department be completed by issuing the requisite withdrawal letters/orders and to share copies of the said withdrawal letter and compliance report with the Police Headquarters on the very next date i.e. 13.03.2023.

(Copy of the letter dated 12.03.2023 is Annexure "Z-F")

35. That subsequent to the letter dated 12.03.2023, Respondents under the garb of Apex Court's judgment and to give undue benefits to their blue-eyed persons have issued impugned Office Orders dated 16.03.2023 whereby the Appellant was illegally demoted

to the ranks of SI which act on their part was/is highly illegal, unlawful, without lawful authority and thus of no legal effect.

(Copies of the Office Orders Dated 16.03.2023 are Annexure "Z-G")

12

36. That resultantly the Appellant have withdrawn his earlier Writ Petition No. 1124-P/2023 with permission to file a fresh one as subsequent developments were being done in the matter.

37. That the Appellant being aggrieved of letter dated 11.03.2023, 12.03.2023 and office order of demotion dated 16.03.2023 as the same was wrongfully based on the so-called Judgment(s) of the Apex Court and matter was within the remit of Article 187(3) of the Constitution, bonafidely assailed the same before the Peshawar High Court Peshawar vide W.P 1289-P of 2023 wherein the Honourable Court while acknowledging the prima facie have graciously granted an interim relief on dated . whereafter all the petitions were heard by the Divisional Bench of the honorable Peshawar high Court, Peshawar on 21.06.2023 and 22.06.2023 whereafter the judgment was reserved for announcement.

38. That the Honorable Divisional Bench while allowing number of cases on dated 29.08.2023 and while clearly holding that the case of the Appellant is not that of any out-of-turn promotion and thus not hit by the mischief of the Judgment(s) of the Apex Court, has transmitted the Appellant's petition before this honorable Service Tribunal, Peshawar for its decision. Relevant para of the Judgment is reproduced herein below for facility of reference as follows:

"In the instant case petitioner was initially appointed in the FRP as Constable and then gained promotion in the regular police as well as in the FRP after undergoing the requisite Police training in the quota reserved for FRP. The question formulated for consideration of this Court primarily relates to the terms and conditions of service, because apparently, this case is distinguishable from other connected cases as in the instant case promotion order of the petitioner is withdrawn for the reason as it is out of turn and violative of the judgment of the Apex Court, however on going through the same we find that no such issue ever raised in the judgments of the Apex Court referred in respect of out of turn Promotions and in these cases neither the

application/implementation of the judgment of the apex Court is required, besides, such matters was also never referred in the judgment of a larger bench of this Court.”

13

(Copy of the Judgment is annexed as Annexure “Z-H”)

39. That after transmission of the ibid Writ Petition, this honorable Service Tribunal the converted Writ Petition into Appeal which was lastly fixed for hearing on dated / /2023 wherein after preliminary hearing the Appeal was admitted for a regular hearing besides an Interim Relief was also granted in favor of the appellant whereas the appellant along with many others were directed by this honorable Tribunal to file separate appeal so as to fulfill the legal lacuna as provided by the service tribunal act or rules.

40. That is worth to place on record that in the meantime the Appellant has filed departmental representation as well before the competent authority on dated / /2023 but most shockingly no order has been made so far on the representation as well.

(Copy of the representation is annexed as Annexure “Z-I”)

41. That the Appellant being seriously aggrieved with Letter dated 11.03.2023, Letter No. 993/Legal dated 12.03.2023 and subsequently an office order dated 16.03.2023 whereby the Appellant was illegally demoted to the ranks of SI which acts on their part are highly illegal, unlawful, without lawful authority and thus of no legal effect.

(Copies of the impugned letters are already Annexed as “Z-E”, “Z-F”, “Z-G”)

42. That the appellant being aggrieved of the ibid impugned letters is filing the appeal in hand as directed by the learned bench of this Honorable Tribunal on the following grounds amongst others :-

Grounds warranting this Appeal:

- a. Because the Honorable Divisional Bench of Peshawar High Court vide its judgment dated 29.08.2023 in para 2 unequivocal hold that the case of Appellant is neither attracted by the judgment of larger bench nor it is attracted by the judgment of apex Supreme Court.

- (14)
- b. Because the "impugned proceedings" are totally against the law applicable and principles of justice and amount to colorful exercise of their official's collar under the garb of the judgment of the Apex Court which is not applicable to the Appellant's case at all thus are illegal, unlawful, without lawful authority and thus of no legal effect.
 - c. Because the "impugned proceedings" are based on malafide and to create more and more vacancies for their blue-eyed persons under the garb of out of turn promotions etc, which conditions are not applicable to the Appellant.
 - d. Because the "impugned proceedings" are arbitrary, whimsical, colorable and are full of malafide.
 - e. Because the "impugned proceedings" are aimed at disturbing, overturning and nullifying earlier judicial proceedings and determinations made in favor of the Appellant which have already attained finality and thus cannot be dislodged and/or put to naught in the garb of implementation of some judgments of the Supreme Court, which are totally out-of-context and not relevant to the case of the Appellant, as was duly noted in the Judgment of the Peshawar High Court dated 29.08.2023, which was required by the apex Supreme Court to examine scope of its Judgments in matter of out-of-turn promotions.
 - f. Because even the AIG Legal, vide his memo dated 08.02.2021 that FRP officials qualified their promotion courses on their turn and have been promoted from one rank to another as per Police Rules, 1934 and subsequently placed at the bottom of the seniority list of their district thus they do not come under the ambit of out of turn Promotion. But despite that the respondents are maneuvering to revert the Appellant under the garb of Apex Court's judgment with malafide to create more and more vacancies for their blue-eyed persons and to adjust them.

(Copy of AIG Legal is Annexure "Z-J")

g. Because the "impugned proceedings/Orders" are in violation of principle of justice, fair play and spirit of Article 2A, 4, 9 10A, 25 and 38 of the Constitution of Islamic Republic of Pakistan. (S)

h. Because the Appellant is being vexed again and again, beside suffering double rather multiple jeopardies.

i. Because the Appellant seek permission to advance other grounds and proofs at the time of hearing.

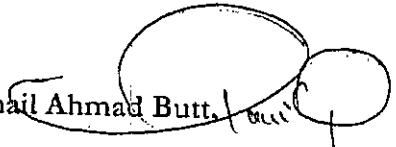
IT IS THEREFORE very humbly prayed that on acceptance of this Appeal, this Honorable Court may very magnanimously hold, declare and Order :-

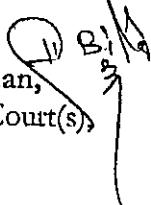
- (i) That impugned letters dated 11.03.2023, 12.03.2023 and office orders of demotion dated 16.03.2023 and any subsequent proceedings or orders emanating/arising therefrom (impugned proceedings) are illegal, unlawful, without lawful authority and thus of no legal effect.
- (ii) The respondents be permanently restrained from reverting the Appellant under the garb of Apex Court's Judgment passed in respect of out of turn promotes, which is not applicable to the case of Appellant as there was neither out of turn promotions, cadetship or gallantry service in FRP and the Appellant have got their promotion after completing courses on their turn as per seniority.

Any other relief, in favor of the Petitioner, deemed just and appropriate.


APPELLANT

Through


Shumail Ahmad Butt,
ASC

And

Hazrat Bilal Khan,
Advocate High Court(s)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2023

16

Shakil Ahmed

versus

Government of Khyber Pakhtunkhwa *et al*

Verification

I, Shakeel Ahmad do hereby solemnly Verify that the accompanying Appeal is true and correct to the best of my Knowledge and belief and nothing has been concealed from this Honorable Tribunal.



DEPONENT
Shakeel Ahmad

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2023

Shakil Ahmed

VERSUS

Government of Khyber Pakhtunkhwa *et al*

**APPLICATION FOR CONTINUATION OF ALREADY GRANTED
INTERIM RELIEF DATED 5/9 /2023 TILL THE FINAL Decision OF
THE INSTANT APPEAL.**

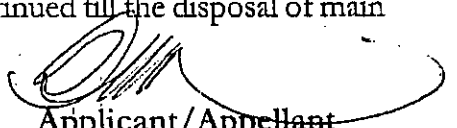
May it please this Honorable Court:

The Applicant/ Appellant very humbly submit as under:

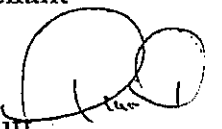
- 1) That the Applicant/ Appellant has filed the above-titled Appeal before this honorable Tribunal today which is fixed for today.
- 2) That the Applicant/ Appellant has got a prima facie case and is very much sanguine of its success.
- 3) That balance of convenience has got a clear verge in favor of the applicant/ Appellant.
- 4) That content of the accompanying Appeal may kindly be considered as integral part and parcel of this application.

It is therefore most humbly prayed that on acceptance of this Application the interim relief already granted may kindly be continued till the disposal of main Appeal

September 14, 2023


Applicant/Appellant

Through


Shumail Ahmad Butt
Advocate Supreme Court of
Pakistan
&


H Bilal Khan


Haris Khan
Advocates High Court(s)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2023

Shakil Ahmed


versus

(18)

Government of Khyber Pakhtunkhwa *et al*

AFFIDAVIT

I, Shakeel Ahmad do hereby solemnly declare that the accompanying Application is true and correct to the best of my Knowledge and belief and nothing has been concealed from this Honorable Tribunal.


DEPONENT
Shakeel Ahmad

EMPLETMENT ORDER.

Candidate No. Shahel Ahmad Annex A
Muhammad Tameel resident of Vill: Gulji Kaudar Kher
Station Mathon Teh: Peshawar Distt: Peshawar
Appointed as Constable in EPS No. 5 i.e (Rs. 140-45-250) w.e. from
1.9.82 and alloted Constabulary No. 1982

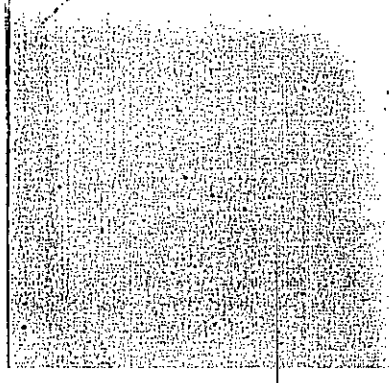
(A)

He is enlisted merely on temporary basis and his
employment would be liable to terminate any time without any notice
in accordance with Police Rules, 12.21.

Height 5-8 1/2 Chest 33 1/2 x 35 1/2
Age 21 years Education 10th
Dt. of Birth 12.1.74

302
27.4.1982

[Signature]
COMMANDANT,
PROVINCIAL RESERVE POLICE DEPT.,
PESHAWAR.



Annex B

26

2.

Subject:- Service Appeal No.1262/2012 Shakeel Ahmad Vs Secretary to Govt of Khyber Pakhtunkhwa Home & T.As Department and others.

A meeting of the Scrutiny Committee on the above subject was held on 22.03.2013 under the Chairmanship of the Secretary Law Department to discuss the issue regarding the fitness/suitability of the subject case for filing of CPLA/Appeal in the Supreme Court of Pakistan or otherwise.

Following attended the meeting:-

1. Mr. Lal Jan Khattak, Addl: Advocate General, KPK
2. Mr. Usman Zaman, S.O.(Court) Home & T.As Deptt:
3. Mian Imtiaz Gul, DSP Legal, CPO Peshawar:
4. Mr. Shakeel Asghar, Dy Solicitor, Law Deptt:

When the case came up for discussion before the Committee and after threadbare discussion it was decided with consensus that it was not a fit case for filing of CPLA in the Supreme Court of Pakistan due to following reasons:-

1. That there was nothing on record to show that appellant was incapable and intentionally avoiding posting as SHO, rather it was the discretion of departmental authority to post him (appellant) as SHO for which appellant cannot be held responsible.

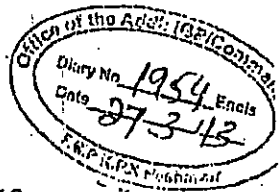
Hence it was decided with consensus that depriving appellant of his due right without any convincing ground was not justifiable in law and such kind of attitude always discourage by the superior courts.

(Shakeel Asghar)
Deputy Solicitor

Annex C ②

From: - The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

To: - The Addl: IGP/Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.




No 724 /Legal Dated Peshawar the, 27-03 /2013.

Subject:- REQUEST FOR IMPLEMENTATION OF THE JUDGMENT OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR OF SERVICE APPEAL NO. 1264/2012.

Memo:-

Please refer to your office letter No. 1476/EC dated 26.02.2013 and this office endorsement No. 482-83/legal, dated 04.03.2013 on the case noted above in the subject.

1. The law department in its meeting held on 22.03.2013 did not find the case fit for appeal in the Apex Supreme Court of Pakistan, copy of minutes of meeting dated 22.03.2013 is attached herewith.
2. The competent authority has granted approval regarding implementation of judgment dated 31.01.2013 passed by service Tribunal in appeal No. 1264/2012.
3. As approved by the competent authority, the said judgment of service Tribunal may be implemented in favour of appellant please.


(MOHAMMAD FAYAZ KHAN)
PSP
AIG/LEGAL,
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

RE 108 19/1/1105
PSP N/A

ADDL IGP/COMMANDANT
FRONTIER RESERVE POLICE

Addl: IGP/Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa Peshawar.

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDER BY THE ADDL: IGP/COMMANDANT FRP KHYBER PAKHTUNKHWA

NOTIFICATION

No. 2291 /EC, **CONFIRMATION IN THE RANK OF SI**

Annex D
22

In compliance with Khyber Pakhtunkhwa Service Tribunal Peshawar Judgment dated 31.01.2013 i.e. "Appeal is accepted the impugned order is set aside and the respondent department is directed to confirm the appellant as Sub Inspector w.e.f. 01.07.2010 as per rule 13.18 of Police Rules 1934" and in light of the direction issued by Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar vide letter No.724/Legal, dated 27.03.2013, Inspector Shakeel Ahmad No.175 is hereby confirmed in the rank of Sub Inspector w.e.f 01.07.2010.

Addl: IGP/Commandant
Khyber Pakhtunkhwa Reserve Police,
Peshawar

No. 2292/93 /EC, dated Peshawar the 28/03 /2013.

Copy of above is forwarded for information to:-

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar w/r to his Memo: No. quoted above.
2. The Addl: IGP/Investigation alongwith two spare copies for publication in the Khyber Pakhtunkhwa Police gazette Part-II.

Addl: IGP/Commandant
Khyber Pakhtunkhwa Reserve Police,
Peshawar

22-3-2013

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-1
ORDER BY THE ADDL: IGP/COMMANDANT FRP KHYBER PAKHTUNKHWA

NOTIFICATION

No. 2801 /EC, CONFIRMATION IN THE RANK OF SI

Inspector Shakeel Ahmad No.175 confirmed in the rank of Sub
Inspector vide Notification No.2291-92/EC, dated 28.03.2013, is hereby
allotted new Number P/01.

[Signature]
Addl: IGP/Commandant
Khyber Pakhtunkhwa Reserve
Police, Peshawar

No. 2801-3 /EC, dated Peshawar the 18 /04 /2013.

Copy of above is forwarded for information to:-

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar w/r to his Memo: No. 724/Legal, dated 27.03.2013.
2. The Addl: IGP/Investigation Khyber Pakhtunkhwa, Peshawar.

[Signature]
Addl: IGP/Commandant
Khyber Pakhtunkhwa Reserve
Police, Peshawar

The Addl: IGP/Commandant
Khyber Pakhtunkhwa Reserve Force,
Peshawar

The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

Annex ^c F^y

315 /EC, dated Peshawar the 29 / 03 / 2013.

(SM)

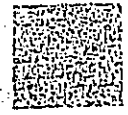
Subject: RECOMMENDATION FOR PROMOTION TO "LIST-F"

Memo:

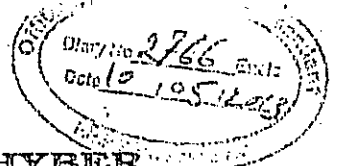
It is submitted that as per decision of Khyber Pakhtunkhwa Service Tribunal Peshawar dated 31.01.2013, recommendation roll on form 315 along with Service Record in respect of Sub Inspector Shakeel Ahmad Chow Inspector are sent herewith for promotion to "list-F". His name be brought on "list-F" w.e. from 01.07.2010, according to Service Tribunal Judgment (Copy attached).

Addl: IGP/Commandant
Khyber Pakhtunkhwa Reserve Force,
Peshawar

(Signature)
28-3-2013



Amers 4



**FOR PUBLICATION IN THE KHYBER
PAKHTUNKHWA, POLICE GAZETTE PART-II
ORDERS BY THE PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA, PESHAWAR.**

25

NOTIFICATION

Dated: 09/05/2013

No. 10764 /E-II, **ADMISSION TO LIST "F" AND PROMOTION AS**

OFFG INSPECTOR:- In the light of Service Tribunal Khyber Pakhtunkhwa decision dated: 31.01.2013 and recommendation of Departmental Promotion Committee duly approved by Provincial Police Officer, Khyber Pakhtunkhwa the name of confirmed Sub-Inspector Shakeel Ahmad of FRP Khyber Pakhtunkhwa is hereby admitted to list "F" and promoted as Offg: Inspector w.e from 01.07.2010.

On promotion as Offg: Inspector he will remain posted to FRP Khyber Pakhtunkhwa.

Necessary Gazette notification may be issued accordingly.

(KHALID MASOOD)

Add: IGP/Headquarters

For Provincial Police Officer,

Khyber Pakhtunkhwa

Peshawar.

No. 10765-67 /E-II

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

1. Add: IGP/Commandant FRP Khyber Pakhtunkhwa Peshawar w/r to his Memo No. 2315/EC, dated: 29.03.2013.
2. Office Supdt: Secret CPO Peshawar.
3. U.O.P file.

" " "

~~Handwritten Signature~~

MEETING HELD ON 06.05.2013 AT 12:00 HRS AT CPO CONFERENCE ROOM PESHAWAR.

A meeting of the Departmental Promotion Committee was held at CPO Conference Room Peshawar at 12:00 hrs on 06.05.2013. The following attended the meeting:-

1. Mr. Khalid Masood
Addl: Inspector General of Police,
Headquarters KPK, Peshawar. Chairman
2. Mr. Awal Khan
Deputy Inspector General of Police,
HQs KPK Peshawar. Member
3. Mr. Asif Zafar Cheema
Deputy Inspector General of Police,
Investigation/HQs KPK Peshawar. Member
4. Mr. Muhammad Fayaz Khan
Assistant Inspector General of Police,
Legal, CPO Peshawar. Member

26

Miscellaneous cases of the following Police officers were discussed and the following recommendations were made as noted against each:-

Confirmation case of Inspectors	Confirmation case of 57 Inspectors was discussed in DPC meeting held 06.05.2013 and due to non availability of their ACR for the year 2012 the same is adjourned till next DPC. The chair directed to address the concerned heads of Officers to provide all the ACRs of Inspectors immediately otherwise this matter will be reported to the Police Chief Khyber Pakhtunkhwa.
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Confirmation case of Inspectors Legal	Confirmation case of 15 Inspectors was discussed in DPC meeting held 06.05.2013 and due to non availability of their ACR for the year 2012 the same is adjourned till next DPC. The chair directed to address the concerned heads of Officers to provide all the ACRs of Inspectors immediately otherwise this matter will be reported to the Police Chief Khyber Pakhtunkhwa.
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Case of Sis Muhammad Yousaf No. D/13, Muhammad Arif No. M/218 and Saifullah No. K/29	The following Sub-inspectors of Khyber Pakhtunkhwa Police were recommended by their Region DisG for admission to list "F" and promotion as Offg. Inspectors. Their case was discussed in DPC meeting held on 10.01.2013 and they were deferred from admission to list "F" and promotion as offg. Inspector as noted against each:-
--	--

S/NO	NAME	REASON
1.	SI Muhammad Yousaf No. D/14 of Dikhan Region	Deferred till re-instatement in service.
2.	SI Muhammad Arif No. M/218 of Mardan Region	Deferred due to incomplete ACRs for period from 01.01.2009 to 13.05.2009 & 2011.
3.	SI Saifullah Khan No. K/29 of CCP Peshawar	Deferred till finalization of departmental enquiry a certificate regarding dual nationality may be obtained from Peshawar.

The DIG/Dikhan Region vide his memo No. 286/ES dated: 01.02.2013 furnished re-instatement order of SI Muhammad Yousaf No. D/13, missing ACRs in respect of Muhammad Arif No. M/218, have also been received from DIG/Mardan Region. Certificate regarding no pending departmental enquiry and dual nationality have also been received from CCP Peshawar in respect of SI Saifullah Khan No. K/29.

Their case was discussed in DPC meeting held on 06.05.2013 and adjourned till next DPC, due to non availability of ACR for the year 2012.

Case of SI Shakeel Ahmad of FRP KPK for promotion to	The Addl. IGP/Commandant FRP Khyber Pakhtunkhwa Peshawar vide his memo No. 2315/EC dated: 29.03.2013 has submitted recommendation Roll in respect of Inspector Shakeel Ahmad for admission to list "F" with effect from 01.07.2010 in the light of service tribunal judgment. The applicant filed an appeal in the Khyber Pakhtunkhwa service tribunal.
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Relevant excerpt of DPC meeting Better Copy

**MINUTES OF THE MEETING HELD ON 06.05.2013 AT 12:00 HRS AT CPO
CONFERENCE ROOM, PESHAWAR**

A meeting of the Department promotion committee was held at CPO Conference room Peshawar at 12:00 hrs on 06.05.2013. The following attended the meeting.

1. Mr. Khalid Masood
Addl. Inspector General of Police
Headquarter KPK, Peshawar
2. Mr. Awal Khan
Deputy Inspector General of Police
Headquarter KPK, Peshawar
3. Mr. Asif Zafar Cheema
Deputy Inspector General of Police
Investigation/HQrsKPK, Peshawar
4. Mr. Muhammad Fayaz Khan
Assistant Inspector General of Police
Legal CPO, Peshawar

Miscellaneous cases of the following police officer were discussed and the following recommendation were made as noted against each.

Case of SI Shakeel Ahmad of FRP KPK for promotion to list F and promotion as offg; inspector	<p>The Addl; IGP/ Commandant FRP Khyber Pakhtunkhwa Peshawar vide his men No. 2315/EC dated 29.03.2013 has submitted recommendation roll in r/o SI (inspector) Shakeel Ahmad for admission to list F with effect from 01.07.2010 in the light of service tribunal judgment</p> <p>The applicant filed an appeal in the Khyber Pakhtunkhwa service tribunal for confirmation as SI. The Khyber Pakhtunkhwa service tribunal accepted his appeal directed the respondents department top confirm the applicant as SI with effect 01.07.2010</p> <p>The police department approached to law department for filling appeal against the judgment of Khyber Pakhtunkhwa service tribunal. The law department accept his case in its meeting held on 22.03.2013 and decided that the same is unfit for filling of CPLA.</p> <p>The judgment sent to Addl; IGP/Commandant FRP Khyber Pakhtunkhwa implementation.</p> <p>The Addl; IGP/ Commandant FRP Khyber Pakhtunkhwa has implemented Court order and conferment SI Shakeel Ahmad with effect from 01.07.2010</p> <p>His case was thoroughly examined by DPC in its meeting held on 06.05.2010 recommended him for admission to list F and promotion as Offg; Inspector w.e. 01.07.2010</p>
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Promotion
Offg:
Inspector

confirmation as SI. The Khyber Pakhtunkhwa service tribunal accepted his appeal directed the respondent department to confirm the applicant as SI with effect 01.07.2010.

The Police department approached to Law department for filing appeal against the judgment of Khyber Pakhtunkhwa Service Tribunal. The law department examined his case in its meeting held on 22.03.2010 and decided that the same is unfit for CPLA.

The judgment sent to Addl: IGP/Commandant FRP Khyber Pakhtunkhwa for implementation.

The Addl: IGP/Commandant FRP Khyber Pakhtunkhwa has implemented court order and confirmed SI Shakeel Ahmad with effect from 01.07.2010.

His case was thoroughly examined by DPC in its meeting held on 06.05.2010 recommended him for admission to list "F" and promotion as Offg: Inspector w. e. 01.07.2010. (27)

Case of SI
Mustaqeem
Shah of FSL

The Addl: IGP/Investigation Khyber Pakhtunkhwa Peshawar vide his memo 8540/Inv: dated: 22.10.2007 has forwarded case of SI Mustaqeem Shah and others promotion as Inspector.

His case was examined by DPC meeting held on 07.11.2007 and supersede promotion as Inspector due to indifferent recorded.

He made representation against the DPC decision, which was examined and filed.

Feeling aggrieved he filed an appeal in the Khyber Pakhtunkhwa Service Tribunal which was decided in his favor with the contents to consider his promotion to the rank of Inspector with e. from 14.01.2008 and further that he placed Senior to respect Nos. 2 and 3, Jehanzeb Khan and Inayatullah Khan.

The judgment of Khyber Pakhtunkhwa Service Tribunal was challenged in the Supreme Court of Pakistan by the Police department. The apex Supreme Court on 16.01.2010 passed the following judgment Supreme Court of Pakistan for the foregoing reasons, while maintaining the impugned judgment, the same is modified to the effect that question of seniority of Mustaqeem Shah and Jehanzeb Khan shall be fixed in their respective sections. With this modification the appeal is disposed.

The judgment of apex Supreme Court sent to Addl: IGP/Investigation for fixation of his seniority and therefore his case for promotion as Inspector may be referred to CPLA.

The Addl: IGP/Investigation Khyber Pakhtunkhwa Peshawar has issued order regarding seniority.

Now his case has been referred to this office for promotion as Inspector in light of Court judgment.

His case was thoroughly examined by DPC in its meeting held on 06.05.2010 and was deferred till receipt of ACR for the year 2011.

Case of SI
Iftikhar Shah
No. NR/42 for
promotion as
Inspector

Case of SI Iftikhar Shah No. NR/42 of Mardan region on list "F" was discussed in DPC meeting held on 15.03.2007 and deferred from promotion as he was in UN Mission.

In the year 2009 he had submitted an application for promotion to the rank of Inspector from Motorway Police but due to his missing ACRs from the year 2006, 7 and 2008 his case was pending.

On completion of his ACRs for the above period his case was put up to high level on which Addl: IGP/HQs ordered that before put up his case to DPC, his written option regarding his repatriation may be asked from IGP/National Highways & Motorway Police Islamabad. IGP/ Motorway Police was addressed accordingly.

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IGP/National Highway and Motorway Police Islamabad vide his letter No. NH & MP -42(7)/12/EC/Vol-I/658 dated: 17.04.2012 has furnished his written option.

His case was discussed in DPC meeting held on 31-07-2012 and deferred due to non-availability of ACRs for the year 2009, 2010 and 2011.

His repatriation order has also been issued.

His case was thoroughly examined by DPC in its meeting held on 06.05.2013 and recommends him for promotion as Offg: Inspector.

(KHALID MASOOD)

Chairman

Addl: Inspector General of Police,
HQrs Khyber Pakhtunkhwa Peshawar

Awal Khan

(AWAL KHAN)

Member

Deputy Inspector General of Police,
HQrs Khyber Pakhtunkhwa Peshawar

Asif Zafar Cheema

(ASIF ZAFAR CHEEMA)

Member

Deputy Inspector General of Police,
Investigation/HQrs KPK Peshawar

Muhammad Fayaz Khan

(MUHAMMAD FAYAZ KHAN)

Member

Assistant Inspector General of Police,
Legal CPO Peshawar

(IHSAN GHANI)

Provincial Police Officer,
Khyber Pakhtunkhwa
Peshawar



From: The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
To: All Addl: Inspectors General of Police,
Khyber Pakhtunkhwa, Peshawar.
The Capital City Police Officer,
Peshawar.
All Regional Police Officers,
In Khyber Pakhtunkhwa, Peshawar.
All Deputy Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
The Commandant PTC,
Hangu.
The Director, Anticorruption Establishment,
Khyber Pakhtunkhwa, Peshawar.
The Registrar, CPO.
The Office Supdt: Secret, CPO.

(29)
Answer "H"

No. 370-90/E-II, dated Peshawar, the 9/5/2014.

Subject: SENIORITY LIST OF INSPECTORS/SUB INSPECTORS ON LIST "F" OF KHYBER PAKHTUNKHWA POLICE AS IT STOOD ON 09.05.2014.

Enclosed please find herewith Seniority list of Inspectors and Sub Inspectors on list "F" of Khyber Pakhtunkhwa Police as it stood on 09.05.2014.

2. Please inform all Officers serving under your command. Any Officer who have any objection on his Seniority Correction should submit his representation within one month after the issuance of the list otherwise no representation will be accepted.
3. 09.06.2014 may be noted as last date for acceptance of objections.


(SYED FIDA HASAN SHAH)

AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar



SENIORITY LIST OF INSPECTORS & SUB INSPECTORS ON LIST "F" OF KHYBER PAKHTUNKHWA POLICE AS IT STOOD ON 09.05.2014

No. _____ /E-II, Seniority List:- The seniority list of Inspectors and Sub Inspectors on List "F" of Khyber Pakhtunkhwa Police as it stood on 09.05.2014 is hereby published for information to all concerned:-

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
1.	Liaqat Shah No. P.54	Peshawar	F.A	18.06.1955	10.04.77	16.08.95	19.09.97	29.06.2001	16.07.2005	17.06.2015	Reinstated in service by Service Tribunal vide No. 18102-4-E-II dt: 13.10.2005
2.	Ifikhar Shah No.MR/42	Mardan	MA	30.04.1966	27.04.91	25.02.2000	20.12.2006	15.07.2013		29.04.2026	He was promoted as Offg. Inspector on 15.07.2013 after repatriation from Motorway Police
3.	Ejaz Ahmad No.H/78	Mansehra	FA	05.04.1963	15.05.81	11.05.2004	31.05.2007	19.07.2007	28.01.2010	04.04.2023	
4.	Arshad Mehmood No. H/79	Mansehra	F.A	15.08.1964	14.03.1983	11.05.2004	07.11.2007	11.01.2008		14.08.2024	
5.	Muhammad Amin No. K/21	Lakki	10 th	15.01.1955	03.06.1972	02.03.2005	07.11.2007	11.01.2008	23.12.2011	11.08.2025	Assigned seniority vide No. 4526-70.E-II dated: 04.03.2008
6.	Muhammad Sajjad No. K/30	Karak	MA	12.08.1965	02.05.1991	16.03.2005	07.11.2007	11.01.2008			
7.	Neor Muhammad No. K/14	Karak	10 th	14.10.1957	16.10.1975	16.03.2007	07.11.2007	11.01.2008	23.12.2011	15.10.2017	
8.	Abdul Salam Khalid No.P/15	Lakki	B.A	24.06.1976	01.07.1998	05.09.2007	07.11.2007	11.01.2008	31.12.2011		
9.	Ghulam Muhammad No. M/173	Dir Upper	10 th	12.05.1956	02.11.1974	05.10.2007	07.11.2007	12.02.2008		11.05.2016	
10.	Hussain Bad Shah No. K/20	Karak	F.A	11.05.1959	11.06.1977	16.07.2005	05.04.2008	05.08.2008	23.12.2011	10.05.2019	
11.	Zahid Ur Rehman No. H/76	Haripur	M.Sc	25.03.1970	31.12.1994	06.04.2006	05.04.2008	05.04.2008		11.04.2019	Reverted as SI by RPO.Bannu vide No. 3067-69.EC dt: 16.11.2010
12.	SI Sanaullah No. D/10	D.I.Khan	10 th	12.04.1959	17.06.1977	01.09.2007	05.04.2008	05.04.2008			
13.	Shakeel Ahmad No. MR/07	Charsadda	B.Sc	14.04.1969	10.11.1992	07.01.2008	05.04.2008	05.04.2008	23.12.2011	13.04.2029	
14.	Muhammad Saeed No. MR/39	Mardan	BA	04.05.1969	01.07.1991	07.01.2008	05.04.2008	05.04.2008	23.12.2011	03.05.2029	
15.	Muhammad Nawaz No. H/40	Mansehra	FA	10.03.1956	12.03.1981	20.03.2008	05.04.2008	05.04.2008		09.05.2016	
16.	Khahir Muhammad No. H/01	Abbonahad	BA	01.01.1972	29.12.1994	27.03.2008	05.04.2008	05.04.2008	31.10.2013	31.12.2031	
17.	Nazia Naureen No. H/02	Abbonabad	FA	01.12.1970	24.11.1995	27.03.2008	05.04.2008	05.04.2008	31.10.2013	30.11.2030	Assigned revised seniority vide No. 12050-53.E-II dt: 13.06.2012
18.	Shahzadi Noshad No. H/02	Hangu	BA	10.04.1972	06.11.1994	27.03.2008	05.04.2008	05.04.2008	31.10.2013	09.04.2032	
19.	Raheem Hussain No. H/85	Kohistan	FA	11.05.1970	24.11.1993	27.03.2008	05.04.2008	05.04.2008		10.05.2030	
20.	SI Zahir Ur Rehman No. H/86	Shangla	10 th	10.01.1962	24.07.1985	27.03.2008	05.04.2008	05.04.2008		09.01.2022	As intimated by Addl. IGP/SB vide his Memo No. 6813/EB. dated: 13.09.2013 he was reverted as SI by DIG/CTD dt: 06.09.2013
21.	Amjad Hussain No. H/87	Mansehra	FA	24.03.1971	01.07.1989	27.03.2008	05.04.2008	05.04.2008	31.10.2013	23.05.2031	

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S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O. BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
22.	Rizwan Habib No. H/88	Mansehra	FA	19.04.1974	20.03.1994	27.03.2008	05.04.2008	05.04.2008	31.10.2013	18.04.2034	
23.	Jehangir No. H/89	Abbottabad	10 th	10.11.1965	30.09.1984	27.03.2008	05.04.2008	05.04.2008	31.10.2013	09.11.2025	
24.	Alam Zeb No. H/91	Haripur	10 th	08.07.1957	24.09.1975	27.03.2008	05.04.2008	05.04.2008	31.10.2013	07.07.2017	
25.	Shamraiz Khan No. H/92	Abbottabad	9 th	10.02.1960	22.06.1974	27.03.2008	05.04.2008	05.04.2008		09.02.2020	
26.	Muhammad Yousaf No. H/93	Mansehra	10 th	04.02.1958	30.08.1976	27.03.2008	05.04.2008	05.04.2008		03.02.2018	
27.	Muhammad Saffdar No. H/95	Abbottabad	9 th	01.06.1958	10.06.1977	27.03.2008	05.04.2008	05.04.2008	31.10.2013	31.05.2018	
28.	Faqir Hussain No. H/94	Mansehra	10 th	10.02.1955	20.07.1974	27.03.2008	05.04.2008	05.04.2008	31.10.2013	09.02.2015	
29.	Muhammad Riaz No. H/38	Abbottabad	10 th	01.04.1959	17.05.1977	27.03.2008	05.04.2008	05.04.2008	31.10.2013	31.03.2019	
30.	Rahmat Ullah No. P/65	Nowshera	10 th	05.03.1971	29.03.1992	03.04.2008	05.04.2008	05.04.2008	31.10.2013	04.03.2031	
31.	Zafullah No. K/43	Karak	10 th	08.08.1955	10.08.1973	07.04.2008	05.04.2008	05.04.2008		07.08.2015	
32.	Muhammad Subhan No. K/46	Karak	10 th	20.11.1957	24.10.1975	07.04.2008	05.04.2008	05.04.2008	31.10.2013	19.11.2017	
33.	Aslam Pervaz No. H/90	Mansehra	B.A	25.12.1956	11.10.1976	08.04.2008	05.04.2008	05.04.2008	31.10.2013	24.12.2016	
34.	Noor Muhammad No. D/20	D.I.Khan	10 th	11.10.1957	17.10.1975	10.06.2008	05.04.2008	05.04.2008	31.10.2013	10.10.2017	
35.	Muhammad Baran No. D/16	D.I.Khan	10 th	03.04.1961	07.07.1979	10.06.2008	05.04.2008	05.04.2008		02.04.2021	
36.	Alamzeb No. MR/61	Mardan	F.Sc	12.02.1980	01.01.2001	20.06.2008	05.04.2008	05.04.2008	31.10.2013	11.02.2040	
37.	Sher Zada No. M/14	Swat	F.A	17.03.1958	10.09.1973	22.06.2008	05.04.2008	05.04.2008	31.10.2013	16.03.2018	
38.	Zahir Shah No. M/156	Bunir	FA	01.04.1962	05.08.1982	22.06.2008	05.04.2008	05.04.2008	31.10.2013	31.03.2022	
39.	Zahir Khan No. M/197	Bunir	10 th	10.01.1963	01.04.1982	22.06.2008	05.04.2008	05.04.2008	31.10.2013	05.01.2023	
40.	Sabir Khan No. P/69	Peshawar	B.A	08.12.1958	21.12.1994	30.06.2008	05.04.2008	05.04.2008		07.12.2018	
41.	S. Jamal Adhar Shah No. P/76	Peshawar	M.Sc	20.03.1975	25.06.1998	30.06.2008	05.04.2008	05.04.2008	31.10.2013	19.03.2035	
42.	Asad Mehmood No. P/85	Loralai	BA	03.03.1968	23.04.1987	30.06.2008	05.04.2008	05.04.2008	31.10.2013	07.03.2028	
43.	Fazal Raziq No. MR/58	Swabi	10 th	06.07.1957	16.10.1975	20.06.2008	05.03.2009	05.03.2009	31.10.2013	05.07.2017	
44.	Yousaf Ali No. M/28	Malakand	FA	31.12.1956	10.12.1974	21.06.2008	05.03.2009	05.03.2009	31.10.2013	30.12.2016	
45.	Muzakir Shah No. M/185	Dir Lower	10 th	01.06.1961	02.09.1980	22.06.2008	05.03.2009	05.03.2009		31.05.2021	
46.	Jehangir Khan No. K/	Karak	FA	05.05.1954	01.05.1973	30.06.2008	05.02.2009	05.03.2009		30.04.2014	
47.	Muhammad Rahim No. K/109	Karak	10 th	08.01.1959	25.01.1977	30.06.2008	05.03.2009	05.03.2009		07.01.2019	
48.	Muhammad Aslam No. K/31	Karak	F.A	08.04.1962	02.09.1980	30.06.2008	05.03.2009	05.03.2009		07.04.2022	
49.	Safdar Khan No. K/74	Kohat	MA	30.04.1971	01.01.1995	30.06.2008	05.03.2009	05.03.2009		29.04.2031	
50.	Murad Ali No. B/19	Bannu	F.A	09.01.1973	08.12.1991	18.08.2008	05.03.2009	05.03.2009		08.01.2033	Rank restored vide DIG. Bannu Endst: No. 585-R6.EC E-II dated: 22.03.2012.
51.	Mujeeb Ur Rehman No. B/09	Bannu	BA, LLB	02.04.1969	11.01.1995	18.08.2008	05.03.2009	05.03.2009	31.10.2013	01.04.2029	
52.	Aneela Naz No. P/54	Peshawar	M.A	09.10.1971	03.04.1996	25.10.2008	05.03.2009	05.03.2009		08.10.2031	
53.	Asma Ara No. P/74	Swabi	MA	15.04.1975	27.03.1996	23.10.2008	05.03.2009	05.03.2009		14.04.2035	
54.	Shahzia Shahid No. P/86	Charsadda	MA, LLB	30.04.1974	31.03.1996	23.10.2008	05.03.2009	05.03.2009		29.04.2034	
55.	Rozia Ahtaf No. P/87	Peshawar	MA	30.07.1969	27.03.1996	23.10.2008	05.03.2009	05.03.2009		29.07.2029	
56.	Hamida Bano No. P/99	Peshawar	B.A	04.12.1970	28.03.1996	23.10.2008	05.03.2009	05.03.2009	31.10.2013	03.12.2030	
57.	Mustafa Kamal Pasha No. B/20	Bannu	MA	01.09.1979	11.01.1995	27.10.2008	05.03.2009	05.03.2009		31.09.2039	

S. No.	NAME AND NO.	HOME DISTRICT	EDU:	D.O. BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMIN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
58.	Azmat Ali No. B/6	Bannu	MA	06.01.1970	11.01.1995	27.10.2008	05.03.2009	05.03.2009	31.10.2013	05.01.2030	Rank restored vide No. 1725538.E-II dated: 08.07.2010.
59.	Waqar Ahmad No. P/101	Charsadda	MA	12.04.1974	24.06.1998	25.11.2008	05.03.2009	05.03.2009	31.10.2013	11.04.2034	
60.	Sajjad Hussain No. P/103	Nowshera	B.Sc	23.03.1976	27.06.1998	25.11.2008	05.03.2009	05.03.2009	31.10.2013	22.03.2036	
61.	Yasir Aman No. P/104	Peshawar	D.Com	11.08.1970	01.03.2000	25.11.2008	05.03.2009	05.03.2009	31.10.2013	10.08.2030	
62.	Muhammad Maroof No. H/4	Abbottabad	B.Sc	05.10.1974	29.07.1998	19.03.2009	05.03.2009	05.03.2009	31.10.2013	04.10.2034	
63.	Abdul Hameed No. H/5	Abbottabad	10 th	22.03.1959	01.04.1978	19.03.2009	05.03.2009	05.03.2009		21.03.2019	
64.	Hakam Khan No. H/6	Mansehra	10 th	16.06.1958	21.10.1976	19.03.2009	05.03.2009	05.03.2009		15.06.2018	
65.	Usman Ghani No. P/7	Peshawar	10 th	09.07.1960	02.12.1978	27.04.2009	05.08.2009	05.08.2009	31.10.2013	08.07.2020	
66.	Ali Gohar No. K/32	K. Agency	MA	23.03.1968	01.01.1995	30.06.2008	01.10.2009	01.10.2009	31.10.2013	22.03.2028	
67.	Qeemat Ullah No. MR/63	Mardan	10 th	15.03.1956	03.01.1976	13.07.2009	01.10.2009	01.10.2009	31.10.2013	14.03.2016	
68.	Muhammad Ilyas No. MR/64	Mardan	FA	25.12.1973	25.12.1993	13.07.2009	01.10.2009	01.10.2009	31.10.2013	24.12.2033	
69.	Rokhan Zeb No. P/120	Swabi	FA	07.04.1965	17.08.1988	13.07.2009	30.07.2010	30.07.2010		06.04.2025	Assigned revised seniority vide No. 100-14/E-II dated: 14.03.2014
70.	Jehanzada No. MR/65	Charsadda	10 th	01.04.1963	07.03.1982	13.07.2009	01.10.2009	01.10.2009	31.10.2013	31.03.2023	
71.	Naseer Ali No. P/01	Charsadda	BA	03.10.1975	26.12.2000	09.01.2009	28.01.2010	28.01.2010	31.10.2013	02.10.2035	
72.	Arshad Khan No. P/122	Peshawar	FSc	30.05.1974	26.06.98	27.03.2009	20.12.2011	20.09.2012		29.05.2034	Assigned revised seniority vide No. 85-99/E-II dated: 14.03.2014
73.	Hidayatullah Shah No. MR/62	Swabi	10 th	20.04.1965	24.04.1983	13.07.2009	28.01.2010	28.01.2010	31.10.2013	19.04.2025	
74.	Muhammad Ismail No. P/107	Lakki	FA	12.06.1966	21.02.1984	20.03.2009	28.01.2010	28.01.2010		11.06.2026	25-3-2016 No 312 SE-1
75.	Shakeel Ahmed No. P/01	Peshawar	FA	12.01.1974	27.04.1995	01.07.2010	01.07.2010	01.07.2010		11.01.2034	
76.	Shabir Hussain Shah No. B/77	Lakki	MA	15.06.1972	11.06.95	08.10.2007	30.07.2010	30.07.2010		14.06.2032	25-3-16 No 312 SE-1
77.	Sona Khan No. K/39	Lakki	10 th	12.10.1961	19.12.1983	03.04.2008	30.07.2010	30.07.2010		11.10.2021	
78.	Aqil Hussain No. K/17	Kohat	BA	01.04.1965	25.03.1987	30.06.2008	30.07.2010	30.07.2010		31.03.2025	
79.	Falak Nawaz No. K/18	Kohat	FA	03.02.1969	26.06.2000	30.06.2008	30.07.2010	30.07.2010		02.02.2029	25-3-16 No 312 SE-1
80.	Asmatullah Khan No. K/28	Lakki	10 th	15.04.1955	01.09.1974	30.06.2008	30.07.2010	30.07.2010		14.04.2015	
81.	Mazhar Jehan No. K/19	Kohat	FA	12.12.1970	26.06.2000	30.06.2008	30.07.2010	30.07.2010		11.12.2030	
82.	Gul Sarwar No. K/23	Karak	BA	01.04.1956	25.10.1975	30.06.2008	30.07.2010	30.07.2010		31.03.2016	
83.	Shoukat Ali Shah No. K/94	Kohat	10 th	09.10.1960	02.10.1985	30.06.2008	30.07.2010	30.07.2010		08.10.2020	
84.	Afsar Khan No. K/59	Karak	10 th	30.01.1961	24.03.1979	30.06.2008	30.07.2010	30.07.2010		29.01.2021	25-3-16 No 312 SE-1
85.	Khaliq Usman No. K/61	Karak	FA	06.01.1967	29.12.1985	30.06.2008	30.07.2010	30.07.2010		05.01.2027	
86.	Nasir Khan No. P/110	Peshawar	FA	20.12.1972	02.05.1991	24.11.2008	30.07.2010	30.07.2010		19.12.2032	
87.	Riaz Ali No. P/111	Mardan	10 th	01.12.1959	02.08.1978	09.03.2009	30.07.2010	30.07.2010		30.11.2019	25-3-16 No 312 SE-1
88.	Muhammad Sattar Khan No. M/198	Chitral	10 th	04.04.1964	29.09.1983	27.04.2009	30.07.2010	30.07.2010		03.04.2024	25-3-16 No 312 SE-1
89.	Noor Habib Gul No. M/278	Charsadda	10 th	01.02.1960	01.12.1981	27.04.2009	30.07.2010	30.07.2010		31.01.2020	25-3-16 No 312 SE-1
90.	Rahim Gul No. M/200	Chitral	8 th	28.01.1955	05.06.73	27.04.2009	30.07.2010	30.07.2010		27.01.2025	

S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
91.	Muhammad Wali Shah No. M/222	Chitral	FA	01.07.1956	17.09.74	27.04.2009	30.07.2010	30.07.2010		30.06.2016	S.P. 1
92.	Muhammad Zaman No. M/279	Shangla	BA	01.01.1965	04.07.1984	27.04.2009	30.07.2010	30.07.2010		31.12.2024	25-03-16-312-585
93.	Hayat Ullah No. M/281	Mardan	10 th	04.08.1965	15.10.1983	27.04.2009	30.07.2010	30.07.2010		03.08.2025	25-03-16-312-585
94.	Muhammad Fayaz No. MR/68	Mardan	FA	07.03.1974	01.03.2000	13.07.2009	30.07.2010	30.07.2010		06.03.2034	25-03-16-312-585
95.	Amir Hussain No. P/119	Swabi	FA	25.05.1965	01.01.1987	13.07.2009	30.07.2010	30.07.2010		24.05.2025	25-03-16-312-585
96.	Muhammad Zarif No. P/112	Peshawar	10 th	25.04.1955	10.08.1973	20.09.2009	30.07.2010	30.07.2010		24.04.2015	S.P. 1
97.	Gran Ullah No. P/115	Charsadda	10 th	15.06.1963	28.07.1982	19.12.2009	30.07.2010	30.07.2010		14.06.2023	25-03-16-312-585
98.	Fazal Wahid No. P/116	Malakand	10 th	12.01.1971	16.12.1989	19.12.2009	30.07.2010	30.07.2010		11.01.2031	25-03-16-312-585
99.	Gohar Ali No. P/117	Peshawar	BSc	15.11.1974	11.07.1998	19.12.2009	30.07.2010	30.07.2010		14.11.2034	25-03-16-312-585
100.	Riaz Khan No. P/118	Peshawar	10 th	03.02.1975	19.02.1994	19.12.2009	30.07.2010	30.07.2010		02.02.2035	25-03-16-312-585
101.	Niaz Muhammad No. MR/71	Mardan	10 th	15.12.1955	07.01.1980	03.03.2010	30.07.2010	30.07.2010		14.12.2015	S.P. 1
102.	Izhar Shah No. MR/72	Mardan	FA	06.03.1966	22.12.1986	17.03.2010	30.07.2010	30.07.2010		05.03.2026	25-03-2016-312-585
103.	Abid Ur Rehman No. P/119	Charsadda	FA	11.11.1969	31.08.1983	22.04.2010	30.07.2010	30.07.2010		10.11.2029	PHX - Nils
104.	Habib Ur Rehman No. H/257	Mansehra	FA	04.03.1966	03.10.89	16.06.2010	30.07.2010	30.07.2010		03.03.2026	25-03-16-312-585
105.	Aurang Zeb No. H/258	Mansehra	10 th	05.01.1970	03.10.89	16.06.2010	30.07.2010	30.07.2010		04.01.2030	25-03-16-312-585
106.	Altaf No. H/185	Mansehra	10 th	04.04.1961	07.01.79	16.06.2010	19.09.2011	19.09.2011		03.04.2021	25-03-16-312-585
107.	Shah Nawaz No. H/191	Mansehra	10 th	08.08.1965	18.09.84	16.06.2010	19.09.2011	19.09.2011		07.08.2025	25-03-16-312-585
108.	Muhammad Khurshid No. H/201	Mansehra	10 th	12.01.1963	01.03.81	16.06.2010	19.09.2011	19.09.2011		11.01.2023	25-03-16-312-585
109.	Ghulam Mustafa No. H/202	Abbottabad	10 th	02.01.1960	24.09.83	16.06.2010	19.09.2011	19.09.2011		01.01.2020	25-03-16-312-585
110.	Hazrat Nabi No. H/204	Swabi	9 th	17.09.1959	15.03.81	16.06.2010	19.09.2011	19.09.2011		16.09.2019	25-03-16-312-585
111.	Muhammad Altaf No. H/51	Haripur	FA	12.03.1969	20.06.88	16.06.2010	19.09.2011	19.09.2011		11.03.2029	25-03-16-312-585
112.	Amjid Ali No. MR/73	Swabi	BA	24.04.1969	22.09.88	15.09.2010	19.09.2011	19.09.2011		23.04.2029	25-03-16-312-585
113.	Sher Rehman No. MR/74	Mardan	10 th	05.04.1964	31.03.82	15.09.2010	19.04.2011	19.04.2011		04.04.2024	15-3-16-1198-357
114.	Jamil-Ur-Rehman	Abbottabad	BA	16.04.1974	07.01.02	07.01.2002	25.02.2008	25.02.2008		15.04.2034	Received on permanent from NH & MP vide order No. 22649-52.E-II.
115.	Relumar Ali No. P/150	Peshawar	10 th	01.03.1960	17.06.79	04.11.2011	10.11.2011	10.11.2011	02.08.2012	29.02.2020	15-11-16-1198-357
116.	Khalid Mehmood No. H/12	Abbottabad	BA	21.05.1961	22.03.1982	08.10.2003	20.12.2011	20.12.2011		20.05.2021	15-11-16-1198-357
117.	Khan Faqir Khan No. M/91	Dir Lower	8 th	01.01.1955	22.06.73	21.06.2008	20.12.2011	20.12.2011		31.12.2014	S.P. 1
118.	Rehmat-Ul-Azam No. M/107	Chitral	FA	04.07.1954	18.09.70	21.06.2008	20.12.2011	20.12.2011		03.07.2014	11
119.	Azee Zubair No. K/20	Kohat	FSc	15.01.1980	24.02.2000	30.06.2008	20.12.2011	20.12.2011		14.01.2040	11
120.	Muhammad Wahid Khan No. M/224	Dir Lower	10 th	02.02.1956	30.11.74	27.04.2009	20.12.2011	20.12.2011		01.02.2016	11
121.	Bashir Khan No. M/225	Dir Lower	FA	10.01.1958	27.11.74	29.04.2009	20.12.2011	20.12.2011		09.01.2018	25-03-16-312-585
122.	Riaz Muhammad No. M/280	Mkd.Swabi	FA	10.12.1962	03.04.83	04.05.2009	20.12.2011	20.12.2011		09.12.2022	15-11-16-1198-357
123.	Bahawal Khan No D/06	D.I.Khan	10 th	25.10.1960	21.12.78	12.09.2009	20.12.2011	20.12.2011		24.10.2020	11
124.	Ifikhar Ali Shah No. B.24	Bannu	BA	11.05.1976	03.03.2000	15.09.2010	20.12.2011	20.12.2011		10.05.2036	11
125.	Shahid Adnan No. D/02	D.I.Khan	MA	27.03.1975	21.12.92	12.11.2010	20.12.2011	20.12.2011		26.03.2033	11
126.	Muhammad Saleem Tariq No. D/03	D.I.Khan	FA	01.03.1969	03.01.91	12.11.2010	20.12.2011	20.12.2011		28.02.2029	11

S. No.	NAME AND NO.	HOME DISTRICT	EDU:	D.O. BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMIN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
127.	Murad Ali No. P/125	Charsadda	10 th	13.04.1965	21.09.83	20.01.2011	20.12.2011	20.12.2011		12.04.2025	15-11-16-1198-567
128.	Ziarat Gul No. P/125	Charsadda	10 th	05.10.1960	20.03.79	20.01.2011	20.12.2011	20.12.2011		04.10.2020	15-11-16-1198-567
129.	Shujat Ali No. P/126	Charsadda	10 th	01.01.1963	14.02.81	20.01.2011	20.12.2011	20.12.2011		31.12.2022	
130.	Naseer Khan No. P/127	Peshawar	BA	01.04.1962	13.10.80	20.01.2011	20.12.2011	20.12.2011		31.03.2022	
131.	Arab Nawaz No. P/128	Charsadda	BA	11.02.1969	15.08.88	20.01.2011	20.12.2011	20.12.2011		10.02.2029	
132.	Inayatullah No. P/129	Peshawar	10 th	11.04.1962	05.11.81	20.01.2011	20.12.2011	20.12.2011		10.04.2022	15-11-16-1198-567
133.	Muhammad Yasin No. P/130	Charsadda	BA	30.03.1975	13.11.96	20.01.2011	20.12.2011	20.12.2011		29.03.2035	15-11-16-1198-567
134.	Muhammad Zaman No. P/131	Mardan	10 th	18.02.1960	16.03.80	20.01.2011	20.12.2011	20.12.2011		17.02.2020	15-11-16-1198-567
135.	Zahoor-Ud- Din Khan No. D/50	D.I.Khan	10 th	05.05.1963	23.04.83	20.01.2011	20.12.2011	20.12.2011		04.05.2023	15-11-16-1198-567
136.	Aqil Hamid No. P/132	Karachi	BA	12.06.1963	05.01.92	12.12.1999	20.12.2011	05.04.2013		11.06.2023	Permanent transferred as SI from Sindh Police to CCP Peshawar on bottom seniority vide No. 1135-37E-II dated 17.01.2011
137.	Raza Khan No. D/01	D.I.Khan	10 th	01.01.1960	11.10.1980	14.02.2011	20.12.2011	20.12.2011		31.12.2019	15-11-16-1198-567
138.	Swab Gul No. MR/75	Mardan	BA	12.04.1961	14.04.79	04.03.2011	20.12.2011	20.12.2011		11.04.2021	15-11-16-1198-567
139.	Noor Rehman No. P/133	Charsadda	BA	15.09.1966	04.07.87	05.03.2011	20.12.2011	20.12.2011		14.09.2026	
140.	Muhammad Ijaz Khan No. P/134	Charsadda	BA	01.09.1977	09.08.95	05.03.2011	20.12.2011	20.12.2011		31.08.2037	15-11-16-1198-567
141.	Shaheen Shah Gohar No. MR/76	Charsadda	BA	03.03.1971	10.10.93	08.04.2011	20.12.2011	20.12.2011		02.03.2031	
142.	Sajjad Haider No. H/03	Abbottabad	10 th	20.04.1970	20.06.88	19.07.2011	20.12.2011	20.12.2011		19.04.2030	15-11-16-1198-567
143.	Ibrar Khan No. H/08	Abbottabad	FA	20.05.1970	23.06.92	19.07.2011	20.12.2011	20.12.2011		19.05.2030	15-11-16-1198-567
144.	Muhammad Yaseen No. H/09	Haripur	FA	28.12.1973	23.06.92	19.07.2011	20.12.2011	20.12.2011		27.12.2033	15-11-16-1198-567
145.	Ifrikhar Ahmed No. H/10	Mansehra	BA	10.05.1968	22.06.87	19.07.2011	20.12.2011	20.12.2011		09.05.2028	
146.	Zakir Hussain No. H/13	Abbottabad	10 th	09.03.1966	23.12.85	19.07.2011	20.12.2011	20.12.2011		08.03.2026	
147.	Muhammad Riaz No. H/14	Mardan	10 th	01.05.1960	22.11.80	19.07.2011	20.12.2011	20.12.2011		30.04.2020	
148.	Muhammad Amjad No. H/15	Mansehra	8 th	26.03.1960	26.09.1980	19.07.2011	20.12.2011	20.12.2011		25.03.2020	
149.	Samina Zaffar No. H/16	Haripur	10 th	25-12-1975	16.06.1996	19.07.2011	20.12.2011	09.08.2012		24.12.2033	
150.	Bashir Ahmed No. H/17	Abbottabad	10 th	11.05.1962	11.02.1982	19.07.2011	20.12.2011	20.12.2011		10.05.2022	
151.	Mehboob No. H/18	Abbottabad	10 th	16.12.1965	27.03.1986	19.07.2011	20.12.2011	20.12.2011		15.12.2025	
152.	Masroob Shah No. H/19	Mansehra	10 th	07.01.1968	01.07.1989	19.07.2011	20.12.2011	20.12.2011		06.01.2028	
153.	Muhammad Hamayun No. H/20	Abbottabad	10 th	01.04.1963	21.11.81	19.09.08	20.12.2011	20.12.2011		31.03.2023	
154.	Farman Akhtar No. H/21	Haripur	7 th	01.01.1966	08.07.84	19.07.2011	20.12.2011	20.12.2011		31.12.2025	
155.	Ashiq Hussain No. H/22	Mansehra	10 th	06.12.1960	24.12.78	19.07.2011	20.12.2011	20.12.2011		05.12.2020	
156.	Mukhtar Aimeed No. H/23	Mansehra	10 th	06.04.1962	09.02.82	19.07.2011	20.12.2011	20.12.2011		05.04.2022	
157.	Adalat Khan No. H/24	Abbottabad	10 th	04.08.1960	04.11.78	19.07.2011	20.12.2011	20.12.2011		03.08.2029	
158.	Ghulam Muhammad No. H/25	Mansehra	10 th	01.11.1963	02.05.82	19.07.2011	20.12.2011	20.12.2011		31.10.2023	
159.	Muhammad Javed No. /26	Mansehra	10 th	03.02.1964	04.04.83	19.07.2011	20.12.2011	20.12.2011		02.02.2024	
160.	Muhammad Nabi No. MR/77	Charsadda	BA	09-10-1966	28.12.85	28.09.2011	20.12.2011	20.12.2011		08.10.2026	
161.	Avaz Mehmood No. MR/78	Mardan	BA	20.07.1971	26.01.91	28.09.2011	20.12.2011	20.12.2011		19.02.2031	

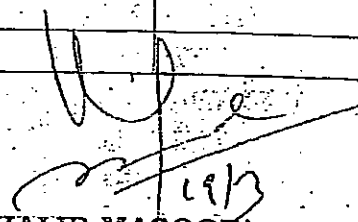
S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SJ	D.O ADMIN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
162.	Shah Muntaz No. MR/79	Dir Lower	FA	20.02.1965	28.06.86	28.09.2011	20.12.2011	20.12.2011		19.02.2025	
163.	Muhammad Baig No. M/239	Chitral	10 th	01.10.1956	08.09.75	13.10.2011	20.12.2011	20.12.2011		30.09.2016	
164.	Muhammad Ibrahim No. M/243	Swat	BA	11.03.1956	23.05.73	13.10.2011	20.12.2011	20.12.2011		10.03.2016	
165.	Ali Murad No. M/245	Chitral	10 th	01.10.1955	04.09.72	13.10.2011	20.12.2011	20.12.2011		30.09.2015	
166.	Habib-UI-Haq No. M/258	Buner	FA	05.04.1958	02.07.76	13.10.2011	20.12.2011	20.12.2011		04.04.2018	
167.	Zafar Ahmed No. M/178	Chitral	FA	10.01.1979	15.01.01	13.10.2011	20.12.2011	20.12.2011		09.01.2039	
168.	Farmanullah No. M/170	Dir Lower	FA	27.10.1978	15.01.2001	13.10.2011	20.12.2011	20.12.2011		26.10.2038	
169.	Gulzar Muhammad No. P/135	Nowshera	BA	01.06.1954	27.09.73	26.10.2011	20.12.2011	20.12.2011		31.05.2014	
170.	Muslim Khan P/137	Mardan	FA	16.02.1970	30.06.88	26.10.2011	20.12.2011	20.12.2011		15.02.2030	
171.	Said Rahim No. P/138	Mardan	10 th	08.02.1962	01.03.81	26.10.2011	20.12.2011	20.12.2011		07.02.2022	
172.	Hukam Khan No. P/139	Charsadda	MA.LLB	14.03.1969	31.12.87	26.10.2011	20.12.2011	20.12.2011		13.03.2029	
173.	Wilayat Khan No. P/140	Peshawar	10 th	20.12.1960	04.03.81	26.10.2011	20.12.2011	20.12.2011		19.12.2020	
174.	Mehar Ali P/141	Nowshera	FA	01.01.1969	31.12.87	26.10.2011	20.12.2011	20.12.2011		31.12.2028	
175.	Yar Nawab No. P/142	Mardan	10 th	05.11.1963	22.11.81	26.10.2011	20.12.2011	20.12.2011		04.11.2023	
176.	Ifkhar Ali No. P/145	Charsadda	10 th	10.02.1968	04.01.87	26.10.2011	20.12.2011	20.12.2011		09.02.2028	
177.	Gohar Zaman No. P/144	Peshawar	FA	08.10.1962	12.10.80	26.10.2011	20.12.2011	20.12.2011		07.10.2022	
178.	Nasir Khan No. P/145	Charsadda	BA	22.11.1968	29.06.88	26.10.2011	20.12.2011	20.12.2011		21.11.2028	
179.	Noor Zaman No. P/146	Mardan	10 th	21.08.1961	15.06.80	26.10.2011	20.12.2011	20.12.2011		20.08.2021	
180.	Hazratullah No. P/147	Charsadda	10 th	05.01.1964	01.08.82	26.10.2011	20.12.2011	20.12.2011		04.01.2024	
181.	Liaqat Ali No. P/148	Charsadda	10 th	08.04.1964	26.03.83	26.10.2011	20.12.2011	20.12.2011		07.04.2024	
182.	Kifayat Hussain No. D/05	D.I.Khan	10 th	01.10.1962	01.04.81	07.06.2011	09.08.2012	09.08.2012		30.09.2022	
183.	Noor Jalil No. 175.M/	Buner	BA	01.02.1958	19.07.76	21.06.2008	30.01.2013	30.01.2013		31.01.2018	
184.	Ghulam Hassan No. 226/M	Chitral	FA	14.01.1957	14.04.73	27.04.2009	30.01.2013	30.01.2013		13.01.2017	
185.	Mehmood Nawaz B/19	Lakki	FA	07.03.1974	29.02.2000	25.08.2010	30.01.2013	30.01.2013		06.03.2034	
186.	Umar Daraz Khan No. D/14	D.I.Khan	10th	11.01.1961	07.03.83	30.05.2011	30.01.2013	30.01.2013		10.01.2021	
187.	Bashir Dad No. P/149	Mardan	10th	14.04.1972	15.09.91	26.10.2011	30.01.2013	30.01.2013		13.04.2032	
188.	Muhammad Riaz No. K/107	Karak	10th	13.08.1973	09.09.1991	02.12.2011	30.01.2013	30.01.2013		12.08.2033	
189.	Roshan Zeb No. P/51	Mardan	FA	16.02.1964	01.04.1982	14.03.2012	30.01.2013	30.01.2013		15.02.2024	
190.	Gul Sheed No. P/152	Charsadda	FA	01.06.1980	06.07.1998	14.03.2012	30.01.2013	30.01.2013		31.05.2040	
191.	Taj Malook No. P/153	Charsadda	BA	10.02.1961	20.03.1979	14.03.2012	30.01.2013	30.01.2013		09.02.2021	
192.	Muhammad Saddique No. P/154	Abbotabad	BA	16.11.1968	31.12.1987	14.03.2012	30.01.2013	30.01.2013		15.11.2028	
193.	Abdur Rehman No. P/155	Peshawar	10 th	17.11.1960	15.01.1981	14.03.2012	30.01.2013	30.01.2013		05.03.2021	
194.	Samin Jan No. P/156	Peshawar	FA	06.03.1961	10.04.1982	14.03.2012	30.01.2013	30.01.2013		19.11.2026	
195.	Amr Badshal No. P/157	Mardan	BA	20.11.1966	22.05.1986	14.03.2012	30.01.2013	30.01.2013		30.04.2030	
196.	Tayyab Jan No. P/158	Bannu	FA	01.05.1970	01.07.1989	14.03.2012	30.01.2013	30.01.2013		30.11.2028	
197.	Fazal Wahid No. P/159	Mardan	10 th	01.12.1968	31.12.1987	14.03.2012	30.01.2013	30.01.2013		01.05.2028	
198.	Fazal Subhan No. P/160	Nowshera	FA	02.05.1968	26.03.1987	14.03.2012	30.01.2013	30.01.2013		09.11.2023	
199.	Alam Zeb No. P/161	Mardan	10 th	10.11.1963	01.11.1982	14.03.2012	30.01.2013	30.01.2013			

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S. #	NAME AND NO.	HOME DISTRICT	EDU:	D.O.BIRTH	D.O JOINING SERVICE	D.O CONF: AS SI	D.O ADMN: TO LIST "F"	D.O CONTINUOUS AS OFFG: INSPECTOR	D.OF CONF: AS INSP:	D.O RTD	REMARKS
200.	Saeed Khan No. P/162	Peshawar	FA	15.04.1964	30.10.1982	14.03.2012	30.01.2013	30.01.2013		14.04.2024	
201.	Noor Ullah No. P/164	Peshawar	D.Com	10.05.1964	24.03.1984	14.03.2012	30.01.2013	30.01.2013		09.05.2024	
202.	Muhammad Ishaq No. P/165	Nowshera	10 th	21.12.1968	01.01.1988	14.03.2012	30.01.2013	30.01.2013		20.12.2028	
203.	Pasham Gul No. P/166	Mardan	10 th	29.04.1963	07.12.1981	14.03.2012	30.01.2013	30.01.2013		28.04.2023	
204.	Mukhtiar Ahmad No. P/167	Charsadda	FA	03.12.1964	13.08.1988	14.03.2012	30.01.2013	30.01.2013		02.12.2024	Promoted to SI 754
205.	Amir Nawaz No. P/168	Charsadda	FA	20.03.1970	27.08.1988	14.03.2012	30.01.2013	30.01.2013		19.03.2030	204
206.	Laiqat Khan No. P/169	Peshawar	10 th	10.06.1962	24.08.1982	14.03.2012	30.01.2013	30.01.2013		09.06.2022	
207.	Muhammad Shoab No. P/170	Mardan	FA	29.03.1962	20.09.1986	14.03.2012	30.01.2013	30.01.2013		28.03.2022	
208.	Afsar Zaman No. P/171	Mardan	FA	01.09.1969	19.06.1988	14.03.2012	30.01.2013	30.01.2013		31.08.2029	
209.	Rajab Ali No. P/172	Kohat	FA	09.02.1975	03.07.1994	14.03.2012	30.01.2013	30.01.2013		08.02.2035	
210.	Johar Shah No. P/173	Charsadda	BSc	10.02.1985	21.10.2006	14.03.2012	30.01.2013	30.01.2013		09.02.2045	
211.	Ali Khan No. P/174	MKD Agy	BA	20.02.1968	25.09.1988	14.03.2012	30.01.2013	30.01.2013		19.02.2028	
212.	Abdur Rashid No. P/175	Charsadda	BA	03.05.1968	01.07.1990	14.03.2012	30.01.2013	30.01.2013		02.05.2028	
213.	Khalid Khan No. P/176	Nowshera	MA	02.01.1969	31.07.1991	14.03.2012	30.01.2013	30.01.2013		01.01.2029	
214.	Niaz Muhammad No. P/177	Charsadda	BA	14.09.1973	03.08.1994	14.03.2012	30.01.2013	30.01.2013		13.09.2033	
215.	Allama Iqbal No. P/178	Charsadda	BA	05.03.1979	24.06.2000	14.03.2012	30.01.2013	30.01.2013		04.03.2039	
216.	Tuheed Ullah No. P/179	Charsadda	MA	06.04.1982	25.01.2002	14.03.2012	30.01.2013	30.01.2013		07.04.2042	
217.	Muhammad Arif No. M/218	Dir Lower	10th	13.09.1956	10.12.1975	10.08.2012	30.01.2013	30.01.2013		12.09.2016	
218.	Waheedullah No. M/160	Dir Lower	BA	01.04.1981	16.01.02	10.08.2012	30.01.2013	30.01.2013		31.03.2041	
219.	Muhammad Nawaz No. M/273	Dir Lower	10th	01.05.1958	01.05.76	10.08.2012	30.01.2013	30.01.2013		30.04.2018	
220.	Zahid Khan No. M/302	Mkd: Agy	FA	08.04.1967	25.09.86	10.08.2012	30.01.2013	30.01.2013		07.04.2027	
221.	Badshah Hazrat No. M/303	Dir Lower	BA	15.02.1969	28.03.1987	10.08.2012	30.01.2013	30.01.2013		14.02.2029	
222.	Naveed Iqbal No. M/176	Swat	FA	13.03.1981	26.12.2001	10.08.2012	30.01.2013	30.01.2013		12.03.2041	
223.	Ajmal Khan No. M/151	Mkd: Agy	FA	15.05.1982	16.01.2004	10.08.2012	30.01.2013	30.01.2013		14.05.2042	
224.	Atiqur Rehman No. M/261	Chitral	FA	01.11.1981	15.01.2004	10.08.2012	30.01.2013	30.01.2013		31.10.2041	
225.	Muhammad Saeed No. M/317	Dir Lower	10th	04.01.1958	05.01.1977	10.08.2012	30.01.2013	30.01.2013		03.01.2018	
226.	Ghulam Sadique No. M/269	Mkd: Agy	BA	01.02.1968	27.03.1986	10.08.2012	30.01.2013	30.01.2013		31.01.2028	
227.	Saifullah Khan No. K/39	Kohat	MSc.LL.B	08.08.1959	10.11.1987	15.08.2012	30.01.2013	30.01.2013		07.08.2019	
228.	Habibullah No. K/45	Bannu	BA	20.10.1957	20.10.1975	15.08.2012	30.01.2013	30.01.2013		19.10.2017	
229.	Muhammad Inbal No. K/10	Peshawar	10th	02.02.1964	02.05.1985	15.08.2012	30.01.2013	30.01.2013		01.02.2024	
230.	Hussain Ghulam No. K/87	Hangu	FA	10.03.1970	10.08.1991	15.08.2012	30.01.2013	30.01.2013		09.03.2030	
231.	Muhammad Iqbal No. H/29	Manshehra	10th	11.02.1963	30.01.1982	31.08.2012	30.01.2013	30.01.2013		10.02.2023	
232.	Farhad Ali No. H/30	Mardan	10th	16.11.1962	16.11.1980	31.08.2012	30.01.2013	30.01.2013		15.11.2022	
233.	Azam Ali Shah No. H/32	Abbottabad	10th	01.01.1963	23.08.1982	31.08.2012	30.01.2013	30.01.2013		31.12.2022	
234.	Arshad Hussain No. H/33	Shangla	10th	15.05.1967	13.12.1990	31.08.2012	30.01.2013	30.01.2013		14.05.2027	
235.	Matloob Khan No. H/34	Haripur	10th	13.04.1970	26.06.1988	31.08.2012	30.01.2013	30.01.2013		12.04.2030	
236.	Shah Nawaz No. H/35	Manshehra	FA	06.06.1967	26.12.1987	31.08.2012	30.01.2013	30.01.2013		05.06.2027	
237.	Shad Muhammad No. H/36	Haripur	10th	31.03.1961	12.09.1981	31.08.2012	30.01.2013	30.01.2013		30.03.2021	

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338	MUHAMMAD FAZIL NO. MR/83	MARDAN	MA.	03.12.1978	28.12.2006	19.09.2012	30.01.2013	30.01.2013	
339	IMTIAZ ALI NO. MR/84	MARDAN	MA	03.01.1977	28.12.2006	19.09.2012	30.01.2013	30.01.2013	
340	GHAZI MARJAN NO. D/17	DIKHAN	10th	02.01.62	26.07.1980	13.12.2012	30.01.2013	30.01.2013	


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

No 6645-69 EPI, dated Peshawar, the 19 / 1 / 3 /2013.

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

- | | | |
|---|--|---|
| 1. Additional IGP/Investigation Khyber Pakhtunkhwa, | 2. Capital City Police Officer Peshawar | 3. All Regions DisG in Khyber Pakhtunkhwa. |
| 4. Addl: IGP/ Special Branch, Khyber Pakhtunkhwa Peshawar | 5. Addl: IsGP/Commandants FRP & PTC Hangu, | 6. DisG Traffic & DCT/SB Khyber Pakhtunkhwa |
| 7. Director Anti Corruption Establishment Khyber Pakhtunkhwa. | 8. Registrar CPO. | 9. Supdt: Establishment CPO. |
| 10. Office Supdt: Secret CPO | | |

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



Amex I

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

PH: 091-9210239 Fax: 091-9210927

Dated 27/08.2019.

NOTIFICATION.

No. CPO/E-II/Confirmation/ 609, in compliance with the Judgment of the Honorable Service Tribunal Khyber Pakhtunkhwa dated 13.02.2019 and DPC held on 01.07.2019, duly approved by the Inspector General of Police Khyber Pakhtunkhwa Mr. Shakeel Ahmed No. P/01 is hereby confirmed in the rank of Inspector w.e.f 01.07.20 with his colleagues. His name is placed in the seniority list of Inspectors at Serial. No. below the name of Inspector Said Khan No. K/221.

(SADIQ BALOCH) PSP
AIG/ Establishment
For Inspector General of Police
Khyber Pakhtunkhwa
Peshawar.

Endst: No. & date even.

Copy forwarded to the:-

1. All Addl: Inspectors General of Police in Khyber Pakhtunkhwa.
2. Dy: Inspector General of Police. HQrs Khyber Pakhtunkhwa Peshawar.
3. The PSO to W/IGP Khyber Pakhtunkhwa Peshawar.
4. Assistant Inspector General of Police Legal Pakhtunkhwa Peshawar.
5. The Register, CPO Peshawar.
6. Office Secret. CP Branch. CPO Peshawar.
7. U.O.P File.

Annex J



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

REVISED SENIORITY LIST OF DSsP BS-17 OF KHYBER PAHTUNKHWA POLICE

Dated: 28 / 06 / 2022

No. 1355 /SE-I, The Revised Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police-Rules 13.18	D.O Promotion as-DSP
1.	Mr. Qaid Kamal	01.01.1963	Charsadda	01.01.1994	01.01.1996	07.11.2012
2.	Mr. Muhammad Aleem Jan	11.04.1967	Peshawar	30.01.1996	30.01.1998	24.01.2014
3.	Mr. Aamir Shahzad	09.08.1968	Peshawar	30.01.1996	30.01.1998	30.06.2011
4.	Mr. Muhammad Arif	10.03.1969	Peshawar	30.01.1996	30.01.1998	19.03.2012
5.	Mr. Waqar Ahmad	03.01.1968	Nowshera	01.04.1997	01.04.1999	19.03.2012
6.	Mr. Muhammad Shafiq	13.01.1963	Bannu	01.10.1997	01.10.1999	19.03.2012
7.	Mr. Muhammad Arif	22.04.1964	Bannu	01.10.1997	01.10.1999	07.11.2012
8.	Mr. Gul Naseeb	09.11.1968	Bannu	01.10.1997	01.10.1999	19.03.2012
9.	Mr. Sanaullah	10.01.1969	Lakki	01.10.1997	01.10.1999	31.03.2012
10.	Mr. Amir Muhammad Khan	07.01.1970	Buner	14.10.1997	14.10.1999	19.03.2012
11.	Mr. Ali Hassan	06.03.1965	K.Agency	28.01.1998	28.01.2000	24.08.2020
12.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	20.02.1998	20.02.2000	30.06.2011
13.	Mr. Munir Hussain	30.05.1966	Mansehra	15.04.1998	15.04.2000	07.11.2012
14.	Mr. Tahir ur Rahman	28.02.1969	Haripur	20.06.1998	20.06.2000	19.03.2012
15.	Mr. Muhammad Suleman	28.07.1970	Mansehra	20.06.1998	20.06.2000	30.06.2011
16.	Mr. Janas Khan	10.02.1965	Abbottabad	20.06.1998	20.06.2000	20.01.2011
17.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	26.05.1987	20.06.2000	25.03.2013
18.	Mr. Asad Mehmood	08.03.1968	Swabi	-	07.09.2000	24.10.2014
19.	Mr. Asif Gohar	07.08.1964	Mansehra	26.04.2000	26.04.2002	20.01.2011
20.	Mr. Tahir Iqbal	20.01.1969	Haripur	26.04.2000	26.04.2002	25.03.2013

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Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
174.	Mr. Farhad Ali	16.11.1982	Mardan	19.09.2008	19.09.2010	16.05.2019
175.	Mr. Zakir Hussain	09.03.1966	Abbottabad	19.09.2008	19.09.2010	30.01.2018
176.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	19.09.2008	19.09.2010	16.05.2019
177.	Mrs. Samina Zafar	25.12.1975	Haripur	19.09.2008	19.09.2010	07.03.2017
178.	Mr. Mehboob	16.12.1965	Abbottabad	19.09.2008	19.09.2010	07.03.2017
179.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	19.09.2008	19.09.2010	30.01.2018
180.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	19.09.2008	19.09.2010	30.01.2018
181.	Mr. Zahoor-Ud- Din Khan	05.05.1963	D.I.Khan	03.12.2008	03.12.2010	15.11.2016
182.	Mr. Muhammad Nabi	09.10.1966	Charsadda	30.12.2008	30.12.2010	30.01.2018
183.	Mr. Ayaz Mehmood	20.02.1971	Mardan	30.12.2008	30.12.2010	30.01.2018
184.	Mr. Shakeel Ahmed	01.01.1974	Peshawar	29.01.2009	-	30.12.2019
185.	Mr. Hussain Ghulam	10.03.1970	Hangu	28.07.2009	28.07.2011	16.05.2019
186.	Mr. Muhammad Akbar	14.05.1963	Mardan	11.08.2009	11.08.2011	18.02.2022
187.	Mr. Zareef Khan	01.01.1969	Swabi	11.08.2009	11.08.2011	18.02.2022
188.	Mr. Bashir Dad	14.04.1972	Mardan	28.08.2009	28.08.2011	30.01.2018
189.	Mr. Arshad Hussain	15.05.1967	Shangla	28.08.2009	28.08.2011	16.05.2019
190.	Mr. Matloob Khan	13.04.1970	Haripur	28.08.2009	28.08.2011	24.08.2020
191.	Mr. Shah Nawaz	08.08.1965	Mansehra	28.08.2009	28.08.2011	30.09.2016
192.	Mr. Fazal Wahab	15.01.1965	Mardan	28.08.2009	28.08.2011	24.08.2020
193.	Mr. Jehanzeb Khan	30.11.1966	Abbottabad	28.08.2009	28.08.2011	24.08.2020
194.	Mr. Muhammad Amin	06.09.1962	Abbottabad	28.08.2009	28.08.2011	18.02.2022
195.	Mr. Muhammad Sohail	30.04.1977	Mansehra	28.08.2009	28.08.2011	19.04.2022
196.	Mr. Muhammad Yousaf	24.08.1964	Haripur	13.10.2009	13.10.2011	24.08.2020
197.	Mr. Muhammad Sajjad	24.03.1969	Mansehra	13.10.2009	13.10.2011	24.08.2020
198.	Mr. Fida Muhammad	11.12.1964	Abbottabad	13.10.2009	13.10.2011	24.08.2020
199.	Mr. Alam Zeb	10.11.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
200.	Mr. Saeed Khan	15.04.1964	Peshawar	18.11.2009	18.11.2011	30.01.2018
201.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	18.11.2009	18.11.2011	16.05.2019
202.	Mr. Pasham Gul	29.04.1963	Mardan	18.11.2009	18.11.2011	30.01.2018
203.	Mr. Nasrullah Khan	20.04.1968	Peshawar	18.11.2009	18.11.2011	18.02.2022

(5)

Sr. No	Name of Officers	Date of Birth	Domicile	Date of SI Promotion	Date of confirmation as SI as per Police Rules 13.18	D.O Promotion as DSP
234.	Mr. Azmat Ali	01.04.1978	Kohat	11.07.2010	11.07.2012	18.02.2022
235.	Mr. Sadat Khan	06.04.1983	Kohat	24.08.2010	24.08.2012	18.02.2022
236.	Mr. Fazal Hanif	01.01.1974	Karak	24.08.2010	24.08.2012	18.02.2022
237.	Mr. Nazar Hussain	10.01.1975	Hangu	24.08.2010	24.10.2012	18.02.2022
238.	Mr. Muhammad Yousaf	10.04.1975	Karak	24.08.2010	24.08.2012	18.02.2022
239.	Mr. Nazir Khan	02.04.1977	Kohat	24.08.2010	24.08.2012	18.02.2022
240.	Mr. Abid Khan	01.03.1979	Kohat	24.08.2010	24.08.2012	18.02.2022
241.	Mr. Umar Hayat	01.02.1984	Karak	24.08.2010	24.08.2012	18.02.2022

NOTE:- Any officer who has any objection regarding his seniority/missing of name/date of birth etc, he must submit his representation within 15 Days after the issuance of this list; otherwise no representation will be entertained after the specific period.


 (DR. ZAHID ULLAH) ^{PSP} ⑨
 AIG/Establishment

For Inspector General of Police,
 Khyber Pakhtunkhwa,
 Peshawar

Endst: No. & date even.
 Copy to all concerned

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**DIRECTORATE OF TRAINING
CENTRAL POLICE OFFICE
KHYBER PAKHTUNKHWA, PESHAWAR**

No. 12347 /Tres dated 24.10 /2022, Phone No. 091-9210941, Fax No. 9211268

To: The Director General,
Pakistan Provincial Services Academy,
Peshawar,

Subject: 8th JUNIOR COMMAND COURSE.

Memo:

Annex K¹

In accordance with Standing Order No.06/2015 and in the light of MoU signed between KP Police & PPSA Peshawar regarding Junior Command Course for eligible DSsP of Khyber Pakhtunkhwa Police, the following DSsP are hereby nominated for the subject course, to be held tentatively w.e.f 09th January, 2023 at Pakistan Provincial Services Academy (PPSA), University Town Peshawar.

S/N	Name of officer	Present Posting	Distt.	D.O.B	CNIC No.	Contact No.	E-mail
1.	Muhammad Fayaz	Acting SP Inv: Swabi	Mardan	07.03.74	16101-7867666-9	03339212120	Fayazkhan1234@gmail.com
2.	Mr. Murad Ali	DSP Elite Force Peshawar	Charsadda	13.04.65	173012877620-1	03499551069	Nil
3.	Mr. Asad Zubair	DSP Elite Force Kohat	Kohat	15.01.80	14301-2906141-5	03339613926	Nil
4.	Mr. Mehmood Nawaz	DSP FRP D.I. Khan	Lakki	07.03.74	11201-036995-9	03329332276	Nil
5.	Mr. Zahoor Ahmad	At Disposal of DIG Spl: Branch	L/Dir	01.01.80	13303-9941147-7	03119614856	zahoorahmad123@gmail.com
6.	Mr. Zafar Ahmad	Acting SP HQs CCP Peshawar	Chitral	10.01.79	15202-0395647-3	03009328666	Nil
7.	Mr. Farman Ullah	Acting SP Inv: Balaur	L/Dir	27.10.78	15202-1804730-1	03469394477	Farmanahmad321@gmail.com
8.	Mr. Wahid Ullah	At Disposal of DIG CTD KP	L/Dir	01.04.81	13302-0913720-1	03449299929	Wahidulhaq123@gmail.com
9.	Mr. Iftikhar Ali Shah	At Disposal of DIG CTD KP	Bannu	11.05.76	11101-4333960-9	03429775000	Iftikharahmad366@gmail.com
10.	Mr. Zahid Khan	SDPO Kabal-Swabi	Malakand	08.04.67	13401-0703466-7	03449781600	Nil
11.	Mr. Ajmal Khan	SDPO Darash L/Chitral	Malakand	15.05.82	13401-4011610-3	03028787981	ajmal.khan123@gmail.com
12.	Mr. Aftiq ur Rehman	SDPO Latkai L/Chitral	Chitral	01.11.81	15201-0571888-3	03469639692	Nil
13.	Mr. Naveed Iqbal	Suspended & Closed to CPO	Swat	13.03.81	13602-6488334-1	03456166678	navneerhussain123@gmail.com
14.	Mr. Gul Shed Khan	SDPO Kailang Mandan	Charsadda	01.06.80	17101-0402905-7	03001837852	Nil
15.	Mr. Jamil ur Rehman	SDPO Khanpur Haripur	Abbotabad	16.04.74	61101-10668893	03005204465	Nil
16.	Mr. Fazal Wahid	SDPO Dara Kohat	Mardan	01.12.68	16102-6007814-3	03009333478	Nil
17.	Mr. Muslim Khan	At Disposal of DIG SSU	Mardan	16.02.70	16101-6565917-1	03139065157	Zulfikarali123@gmail.com
18.	Muhammad Sadique	DSP Spl: Branch	Abbotabad	16.11.68	17301-1663317-7	03163140034	Nil
19.	Mr. Faqir Hussain	DSP CTD KP	Peshawar	02.02.67	Nil	Nil	Nil
20.	Mr. Fulaam Khan	DSP CTD KP	Charsadda	14.03.69	17101-8058704-7	03095820448	Nil
21.	Mr. Meher Ali	DSP Complaint/Enquiry CCP Pesh:	Charsadda	01.01.69	17201-2318470-3	03343018070	Nil
22.	Mr. Meher Ali	DSP Enquiry CPO Peshawar	Nowshera	01.01.69	17102-0380684-9	03003973222	Nil
23.	Mr. Nasir Khan	SDPO Topi Swabi	Charsadda	10.02.68	17102-0380684-9	03439003230	Nil
24.	Mr. Nasir Khan	SDPO Jandul L/Dir	Charsadda	22.11.68	17102-1149121-7	03439003230	Nil
25.	Mr. Tayyab Jan	DSP/HQs CCP Peshawar	Charsadda	01.05.70	17101-9462001-1	03149119196	Nil
26.	Mr. Asif Mehmood	DSP CTD Orekzai	Bannu	25.04.75	16202-6955714-5	03009078718	Shahidkhan123@gmail.com
27.	Mr. Iftikhar Khan	SDPO Kandar Turghar	Abbotabad	20.05.70	11101-0971391-9	03018143992	Nil
28.	Mr. Ayaz Mehmood	DSP Inv: City Mardan	Mardan	20-02-71	42000-037450-5	03437000091	Mehmoodmehmood@gmail.com
29.	Mr. Shakeel Ahmad	Acting SP/Director PTS Shakas & SP Training CPO Peshawar.	Peshawar	01.01.74	17301-0460543-7	03129993330	shakeelahmad123@gmail.com
30.	Mr. Zareef Khan	DSP Inv: Swabi	Swabi	01-01-69	16202-436362-7	03139191010	Zareefkhan123@gmail.com
30.	Malik Habib Khan (Lazal)	SDPO Bhdaber CCP Peshawar	Peshawar	10.01.82	17301-1522790-1	03340161007	malikhabibkhan123@gmail.com

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Furthermore, in case officer at S/No.13 not re-instated in service till 09.01.2023 then Mr. Shah Nawaz shall report to PPSA alongwith the above mentioned officers as his substitute. His particulars are noted below:-

Name & Cadre	Present Posting	District	D.O.B	CNIC No.	Mobile No.	E-mail
Mr. Shah Nawaz	DSP AT'S CCP Peshawar	Manseltru	08.08.65	03302-9960781-3	0313-9766943	Shahnawaz123@gmail.com

All nominees are directed that, in case of any query may contact to PPSA on Phone Numbers 091-9224482 & 091-9224371, please.

(Signature)
(FEROZE SHAH) PSP
Deputy Inspector General of Police,
Training, Khyber Pakhtunkhwa,
Peshawar

Endst: No. and date Even:

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

1. Additional Inspector General of Police, HQs, Khyber Pakhtunkhwa.
2. Additional Inspector General of Police, Investigation Khyber Pakhtunkhwa.
3. Deputy Inspector Generals of Police, HQs, Special Branch & CTD Khyber Pakhtunkhwa.
4. CCPO Peshawar and All Regional Police Officers, Khyber Pakhtunkhwa.
5. Assistant Inspector General of Police, Establishment CPO Khyber Pakhtunkhwa Peshawar.
6. PSO to IGP Khyber Pakhtunkhwa.

10247/E1

Annex 'L'



OFFICE OF THE
COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR

Email: comdfrpofficial@gmail.com
Ph: No. 091-9211773 Fax No. 091-9214114

No. 5570 /EC, dated Peshawar the, 7 /07/2022. (43)

To: - The Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

07/07/2022

Subject: - 8th Junior Command Course

Memo:- Kindly refer to the CPO Peshawar Letter No. CPO/E-1/1399, dated 05.07.2022.

It is submitted that in the light of Judgment of Service Tribunal Khyber Pakhtunkhwa Peshawar Dated 31.01.2013 and as well as recommendation of Departmental Selection Committee held at CPO Peshawar dated 01.07.2019, promotion so far granted to DSP Shakeel Ahmed is not into the ambit of Out of turn Promotion, please.

S. No.	Name of Officer	Date of Birth	Present Posting	Domicile	Remarks Conveyed by	Remarks by RPOs/CCP	Name have included in out of turn list: Yes or No.
	Column No. 01	Column No. 02	Column No. 03	Column No. 04	Column No. 05	Column No. 06	Column No. 07
1	Mr. Shakeel Ahmed	01.01.1974	DSP Admn: School of IT Peshawar	Peshawar	CCP Peshawar	Got Benefit from FRP KPK	No

COMMANDANT
Frontier Reserve Police,
Khyber Pakhtunkhwa,
Peshawar.



DIRECTORATE OF TRAINING
CENTRAL POLICE OFFICE
KHYBER PAKHTUNKHWA, PESHAWAR
Email: dsptregbasic@gmail.com

No. 8769 Trg. dated 09/11/2021 Phone No. 091-9210941, Fax No. 9211268

To The Director General
Pakistan Provincial Services Academy
Peshawar.

Subject 7th JUNIOR COMMAND COURSE.
Memo:

Annex M⁴⁴

As approved by the Competent Authority that 7th Junior Command Course for eligible Khyber Pakhtunkhwa Police in accordance with Standing Order No.06/2015 and MoU between KP Police Peshawar the following DSsP are hereby nominated for the subject course, to be held w.e.f 1st December Pakistan Provincial Services Academy (PPSA), University Town Peshawar.

S/No.	Name of DSP	Present Posting	Dlstt.	D.O.B.	NIC No.	Contact No.	E
1.	Mr. Murad Ali	SDPO Sarai Naurang Lakki	Bannu	09.01.73	11101-0156413-1	03360240300	muradali123
2.	Mr. Mujeeb ur Rehman	Acting SP Inv: Haripur	Bannu	02.04.69	11101-5663289-1	03331659494	mujeeb2021
3.	Ms. Anceela Naz	DSP Traffic Peshawar	Peshawar	09.10.71	17301-1279291-0	03320999595	anceela123
4.	Ms. Asmat Arn	DSP Academic School of Inv: Pesh:	Swabi	15.04.75	16202-0822435-0	03411477887	asmatarn123
5.	Ms. Shazia Shahid	DSP Traffic Highway KP	Charsadda	30.04.76	17101-0259435-2	03339448158	shazia123
6.	Ms. Rozia Iltaf	DSP/HQrs Elite Force Peshawar	Peshawar	30.07.69	17301-7251455-6	03349190394	rozia123
7.	Ms. Hameeda Bano	DSP/Admin School of Tactics	Peshawar	04.12.70	17301-7302116-2	03339373380	hameedah123
8.	Mr. Mustafa Kumal Pasha	DSP ACE Khyber Pakhtunkhwa	Bannu	01.09.69	17301-1327775-9	03339354647	mustafa123
9.	Mr. Azmat Ali Khan	DSP ACE Khyber Pakhtunkhwa	Bannu	06.01.70	11101-7243136-3	03348755255	azmat123
10.	Mr. Sajjad Hussain	Acting SP Rural CCP Pesh:	Nowshera	23.03.76	17201-1744726-1	03119279239	sajjad123
11.	Mr. Yasir Aman	SDPO Parova DI Khan	Peshawar	11.08.70	17301-1660796-9	03018492463	yasir123
12.	Muhamad Maroof	DSP Security Governor House	Abbotabad	05.10.74	17301-1678080-9	03339107445	maroof123
13.	Mr. Ali Gohar	DSP Special Branch	Kurrum	23.03.68	21302-7557225-7	03339149481	aligohar123
14.	Muhammad Ilyas	DSP Ops: CPO Peshawar	Mardan	01.04.73	16101-1974335-3	03336000467	ilyas123
15.	Mr. Fazal Dad	DSP/Admin PSTM Kohat	Charsadda	16.03.66	17101-0352803-3	03129147060	fazal123
16.	Mr. Naseer Ali	DSP ACE KPK	Charsadda	03.10.75	17101-8779375-3	03339106866	naseer123
17.	Mr. Arshad Khan	Special Branch KPK	Peshawar	30.05.74	17301-8174125-5	0333353248	arshad123
18.	Mr. Hidayat Ullah Shah	DSP FRP Mardan	Swabi	20.04.65	16201-9644393-7	03125739003	hidayat123
19.	Muhammad Ismail	Closed to CPO	Lakki	12.01.66	11201-9840396-9	03349100014	ismail123
20.	Mr. Shakeel Ahmad	DSP Trg: CPO & DSP/Admin School of LT Peshawar	Peshawar	01.01.74	17301-0460542-7	03129595330	shakeel123
21.	Mr. Shabir Hussain Shah	DSP CTD KPK	Lakki	15.06.72	11201-9730100-3	03453936393	shabir123
22.	Mr. Falak Nawaz	DSP PAS CPO Peshawar	Kohat	03.02.69	14301-7437339-9	03459650273	falak123
23.	Mr. Muzhar Jehan	CTD KPK	Kohat	12.12.70	14301-1986920-7	03339612658	muzhar123
24.	Mr. Ishaq Gul	DSP Legal Kohat	Kohat	10.04.60	14301-6261803-9	03331933376	ishaq123
25.	Mr. Rashid Ahmad	DSP Legal Abbotabad	U/Dir	02.02.80	15702-2505291-7	03083003922	rashid123

All nominees are hereby directed that, for any query please contact to PPSA on Phone No 9224482 & 091-9224371.

(Dr. Quraish Khan) PSP, Ptd
Assistant Inspector General of Po
Training, Khyber Pakhtunkhwa

Endst: No. and date Even:

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

1. Additional Inspector General of Police, HQrs, Khyber Pakhtunkhwa.
2. Additional Inspector General of Police, Investigation Khyber Pakhtunkhwa.
3. Deputy Inspector General of Police, HQrs Khyber Pakhtunkhwa.
4. Deputy Inspector General of Police, Operation Khyber Pakhtunkhwa.
5. Deputy Inspector General of Police, Special Branch Khyber Pakhtunkhwa.
6. Deputy Inspector General of Police, Telecommunication, Khyber Pakhtunkhwa.
7. Deputy Inspector General of Police, CTD Khyber Pakhtunkhwa.
8. All Regional Police Officers, in Khyber Pakhtunkhwa.
9. Director Anti-Corruption Establishment Khyber Pakhtunkhwa.
10. Assistant Inspector General of Police, Establishment CPO Khyber Pakhtunkhwa Peshawar.
11. PSO to IGP Khyber Pakhtunkhwa.
12. Registrar, Supdt: E-I, Central Police Office Peshawar.



**OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.**

Telephone No. 091-9210641 Fax No. 091-9212597

No. 4521 /EC-1, dated Peshawar the 26 / 11 /2021.

To: - The Asstt: Inspector General of Police,
Establishment, Khyber Pakhtunkhwa,
Peshawar.

Annex 05

Subject: **IMPLEMENTATION OF JUDGMENT OF APEX COURT.**

Memo:

Please refer to your office Memo: No.CPO/CPB/427,
dated 19.11.2021.

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It is submitted that the requisite information on the
prescribed proforma is attached herewith as desired, please.

SSP/Operations
For CAPITAL CITY POLICE OFFICER,
PESHAWAR

26/11

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Name of Officer	Present status of officers/Officials	Gained Benefit					Ranks of the colleagues	Original Colleagues	Decision of committee
		Gallantry	Cadet	Sports	Drill Instructor	If any other with case description			
Muhammád Ismail Shah	DSP	Gallantry					Sardar Ali was retired as Sub-Inspector and Nasrullah Shah was struck off due to natural death	Sardar Ali No.609 and Nasrullah Shah No.24	
Rchmat Ullah	DSP	Gallantry					Syed Rizwan Shah Was retired as Sub-Inspector on- 24.01.2020	His Colleagues S.Rizwan Shah and Ghulam Qadir were confirmed in the rank of ASI on 05.04.2008	
Zar Wali	DSP	Gallantry					Muqarab Khan was retired on medical Board as Sub-Inspector on 16.11.2020	His colleagues Syed Masood Shah and Muqarab Khan were confirmed in the rank of ASI on 05.04.2008	
Fazal Wahid	DSP	Gallantry							
Rokhan Zeb	DSP					Lien Transferred to Mardan in 2005 and again transferred to CCP in 2010			
Fazal Subhan		Gallantry						His colleagues Ihsan Ullah and Sher Malik were promoted to the rank of Offr. ASI on 21.08.2007	

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Insp: Establishment
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(57)

7.	Bashir Dad	DSP	Gallantry					Liaqat Ali was retired as Sub-Inspector	His colleagues Muhammad Sher and Liaqat Ali were promoted to the rank of ASI on 03.09.2007
8.	Gron Ullah	DSP	Gallantry						His colleagues Muhammad Akbar and Gulfaraz were confirmed in the rank of ASI on 05.04.2008
9.	Rajab Ali	DSP	Gallantry						His colleague Qeemat Gul was promoted to the rank of OI on 16.07.2008
10.	Zia Ullah	Inspector						Lien transferred from FRP in 2005	
11.	Sabz Ali	Inspector	Gallantry						
12.	Imran Ud Din	ASI	Gallantry						
13.	Banaras Khan	DSP		Cadet				Retired	Munaf Gul 998
14.	Gohar Ali	DSP		Cadet				Sub-Inspector (Superannuation 2014)	Liaqat Ali No.278/P
15.	Riaz Khan	DSP	Gallantry	Cadet		FRP		Retired	Wajid Ali No.409
16.	Arah Nawaz	DSP		Cadet					
17.	Muhammad Yaseen	DSP		Cadet				Inspector	Qazi Aslam
18.	Muhammad Ijaz Khan	DSP		Cadet					Confirmed by DIG Mardan Under Standing Order. 11/87
19.	D. M. Muhammad	Inspector		Cadet					
20.	Nasir Khan	DSP				FRP			

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7/12

[Signature]
Insp: Establishment
07/12

[Signature]

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SSP/ORD:
7-1-2-2012



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9212597

No. 7434

/EC-I, dated Peshawar the 13/04/2022.

To: -

The Assistant Inspector General of Police
Establishment, Khyber Pakhtunkhwa,
Peshawar.

Annex "D"

Subject:

OUT OF TURN PROMOTION / IMPLEMENTATION OF
JUDGMENT OF APEX COURT.

Memo:

Please refer to your office letter No.CPO/CPB132, dated
05.04.2022 on the subject cited above.

It is submitted that the requisite information regarding subject
matter is sent herewith for further necessary action, please.

(Waseem Ahmad Khalil) SSP/Coord
For CAPITAL CITY POLICE OFFICER,
PESHAWAR

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o/c

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Sl. No.	Name of Officer	Present status of officers/Officials	Gained Benefit				Ranks of the colleagues	Original Colleagues	Decision of committee
			Gallantry	Child	Sports	Drill Instruct or			
1.	Muhammad Ismail Shah	DSP	Gallantry	--	--	--	Sardar Ali was retired as Sub-Inspector and Nasrullah Shah was struck off due to natural death	Sardar Ali No.609 and Nasrullah Shah No.24	
2.	Rehmat Ullah	DSP	Gallantry						
3.	Fazal Wahid	DSP	Gallantry				Muqarab Khan was retired on medical Board as Sub-Inspector on 16.11.2020	His colleagues Syed Masood Shah and Muqarab Khan were confirmed in the rank of ASI on 05.04.2008	
4.	Rokhan Zeb	DSP					Hein Transferred to Mardan in 2005 and again transferred to CCP in 2010		
5.	Fazal Subhan		Gallantry					His colleagues Ihsan Ullah and Sher-Malik were promoted to the rank of Offg. ASI on 21.08.2007	

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17.	Shakeel Khan	DSP					FRP		
18.	Tayyab Jan	DSP					FRP	Inspector	Transferred from FRP on 14.11.2007 and placed below the name of Gul Arif
19.	Babar Khan	Sub-Inspector			Cadet			Asstt: Sub-Inspector	Gohar Ali No.3450 Gulzar Khan No.1324
20.	Muhammad Idrees Khan	Sub-Inspector			Cadet			Sub-Inspector	Tariq Ahmad No.399/P
21.	Muhammad Ishaq	Sub-Inspector			Cadet			Sub-Inspector	Tariq Ahmad No.399/P
22.	Ali Said	Sub-Inspector			Cadet			Sub-Inspector	Qaiser Khan 320/P
23.	Tariq Khan	Sub-Inspector			Cadet			Sub-Inspector	Qaiser Khan 320/P
24.	Bakht Munir	Sub-Inspector			Cadet			Assistant Sub-Inspector	Muhammad Usman No.4431
25.	Abdul Ali Shah	Sub-Inspector			Cadet			Sub-Inspector	Zainoor Shah No.337/P
26.	Aurang Zeb	Sub-Inspector			Cadet			Sub-Inspector	Qaiser Khan 320/P
27.	Mushtaq Ahmed	Sub-Inspector			Cadet			Sub-Inspector	Qaiser Khan 320/P
28.	Qazi Nisar Ahmed	Sub-Inspector			Cadet			Sub-Inspector	Murad Ali No.1336/P
29.	Muhammad Javed	Sub-Inspector			Cadet			Sub-Inspector	Muhammad Jaffar No.188/P
30.	Riaz Ali Shah	Inspector			Cadet			Sub-Inspector	Hidayat Khan No.P/427


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Out of Turn promoted/Retired Police Officers/Official

No	Name of Officer	Present status of officers/Officials	Granted Benefit				Rank of the colleagues	Original Colleagues	Decision of committee
			Gallantry	Cadet	Sports	Drill - Instruct - or			
1.	Zar Wali	DSP	Gallantry	--	--	--	Said Rizwan Shah was retired as SI on 24.04.2008	His colleagues said Rizwan Shah and Gullian Qadar were confirmed in the rank of ASI on 05.04.2008	
2.	Granullah	DSP	Gallantry					His colleagues Muhammad Akbar and Gul Fraz were confirmed in the rank of ASI on 05.04.2008.	
3.	Burhan Khan	DSP		Cadet			Retired	Munir Gul 998	

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SSP/COORD.



Annex Q

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9212597

No. 4644 /EC-1, dated Peshawar the

12 / 03 / 2023.

To: The Asstt: Inspector General of Police,
Establishment, Khyber Pakhtunkhwa,
Peshawar.

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Subject: OUT OF TURN PROMOTION / IMPLEMENTATION OF
JUDGMENT OF APEX COURT.

Memo:

Please refer to your office Memo No. CPO/CPB/45, dated
27.01.2023 on the subject cited above.

It is submitted that the requisite information on the prescribed
proforma is attached herewith as desired, please.

Encls: (24 Pages)

For CAPITAL CITY POLICE OFFICER,
PESHAWAR.

[Handwritten Signature]



Subject: Implementation of judgment of apex court

Capital City Police Peshawar

S#	Name of officer	Present status of officer/official	Gained benefits					Rank of the colleagues	Original colleagues	Decision of committee
			Gallantry	Cadet	Sport	Drill Instructor	If any other with case description			
1	Muhammad-Ismael Shah	DSP	Gallantry					Retired (Offg: Sub Inspectors)	His immediate predecessor is Offg: SI Sardar Ali No.609 and his immediate successor is Offg: SI Nasrullah Shah No.24	He was promoted as Offg: ASI on 02.08.2002, while he was confirmed in special case as ASI on 02.08.2004. Moreover, his colleagues were confirmed in the rank of ASI on 13.12.2007. Therefore, he was confirmed earlier than his batchmates because of gallantry.
2	Rehmat Ullah	DSP	Gallantry					All his D list colleagues are retired.	All his D list colleagues are retired.	He was promoted as Offg: ASI vide CCP, Notification No. 15436/EC, dated 17.12.1995 in a special case. Moreover, his D list colleague Dost Muhammad was retired as Sub Inspector while another colleague Qeemat Gul was compulsorily retired as an IHC on 16.08.2001. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspector.

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3	Zar Wali Retired.	DSP Retired	Gallantry					Retired Sub Inspector	His immediate predecessor is SI S.Rizwan Shah and his immediate successor is SI Ghulam Qadir who were confirmed in the rank of ASI on 05.04.2008.	He was promoted as Offg: ASI on 25.05.2005, while he is confirmed in special case as ASI on 22.02.2006. Hence, his confirmation has violated Police Rule 13.18. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspector.
4	Fazal Wahid	DSP	Gallantry Case FIR No. 71, dated 30.11.2006 U/S 324/353 PPC 13/P.O,5-F Act 148/149/PPC PS Sarband Peshawar					Retired Sub Inspectors	His colleagues Sayed Masood Shah was died as an IHC on 18.11.2003 while Muqarab Khan was retired as an Offg: SI	He was confirmed in the rank of ASI and promotion to list "E" as a special case vide CCP, No.5973-75/EC-I, dated 13.12.2006. Moreover his colleagues were confirmed in the rank of ASI on 05.04.2008. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspector.
5	Rokhan Zeb	DSP					Lien Transferred to Mardan in 2005 and again transferred to CCP in 2010		Transferred to CCP, Peshawar from Mardan as a confirmed SI.	He was recruited in District Charsadda (Peshawar Range). Lien transfer to Mardan as Offg: ASI promoted on 28.09.2005 vide CPO Order No. 22317-18/E-II, dated 28.12.2006. Lien transfer to CCP, Peshawar as confirmed SI vide CPO Order No. 9947-48/ E-II, dated 10.04.2010. Hence, he did not take any benefit in the case of out of turn under CCP, Peshawar.

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6	Fazal Subhan	DSP	Gallantry					Confirmed Inspectors	Immediate predecessor is confirmed Inspectors Ihsan Ullah and his immediate successor is confirmed Inspectors Sher Malik who were promoted to the rank of Offg: ASI on 21.08.2007 and confirmed in 01.03.2016.	Promoted as Offg: ASI as special case vide No. 1066-73/EC-I, dated 27.01.2006. While his colleagues were promoted as Offg: ASI on 03.09.2007. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Inspector.
7	Bashir Dad	DSP	Gallantry Case FIR.Nos. 618 dated 19.07.2006 U/S 382/411 PPC PS Town FIR No. 03 dated 09.09.2006 U/S 302.PPC PS Tehkal					Liaqat Ali retired as Offg: Sub-Inspectors	His immediate predecessor is Offg: SI Muhammad Sher and his immediate successor is Offg: SI Liaqat Ali who were promoted in the rank of Offg: ASI on 03.09.2007.	He was promoted as Offg: ASI as a special case vide No. 6127-32/EC-I, dated 18.12.2006 and was confirmed in the rank of ASI on 26.10.2011. While his colleagues were promoted as Offg: ASI on 03.09.2007. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspector.
8	Gran Ullah Retired.	DSP Retired.	Gallantry						His immediate predecessor is Muhammad Akbar and his immediate successor is Gulfaraz who were confirmed in the rank of Offg: ASI on 05.04.2008.	He was promoted as Offg: ASI on 28.01.2006. However he was confirmed as ASI in special case vide No. 5627-30/EC-I, dated 28.11.2006. Hence his confirmation has violated Police Rule 13.18.

9	Rajab Ali	DSP	Gallantry Case FIR No. 238/239, dated 25.03.2006 U/S 365/324/353/148 3149-PPC 3/4/5 Exp: Act 7-ATA PS-University Town Peshawar					Now Inspectors	His colleague Inspector Qeemat Gul was promoted to the rank of Offg: ASI on 16.07.2008	He was promoted as Offg: ASI vide CCP, Order No. 1771-76/EC-I, dated 03.04.2006 in a special case. While his colleagues were promoted on 16.07.2008. He was recruited by DPO Kohat and his lien was transferred to CCP, Peshawar. However, his lien Order/Date has not been traced in this office. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Inspector.
10	Zia Ullah	Inspector					Lien transferred from FRP vide CPO.No. 2789-90/E-II, dated 21.02.2006 as IHC.			He did not get any benefit in order of out of turn in CCP, Peshawar.
11	Sabz Ali	Inspector	Gallantry					Confirmed SIs and Inspectors	His immediate predecessor is confirmed SI Gul Jalal and his immediate successor is Inspector Javed Akhtar.	He was promoted as Offg: ASI on 26.11.2009, while he was confirmed in the rank of ASI on 01.08.2011. Hence his confirmation has violated Police-Rule 13.18.
12	Imran Ud Din	SI	Gallantry					Confirmed SIs.	His immediate predecessor confirmed SI Qasim Shah and his immediate successor is confirmed SI Khan Wali-Shah	He was promoted as Offg: ASI vide Notification No. 10856/EC-I, dated 08.08.2012 as special case and confirm as ASI on 10.12.2014. <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspector.

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13	Banaras Khan Retired	DSP Retired		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Retired		
14	Gohar Ali	DSP		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Sub Inspectors	His immediate predecessor is Offg: ASI-Syed Kifayat Ali Shah No. 1893	<p>i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 3998-4001/EC, dated 18.05.1999.</p> <p>ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.</p> <p>CONSEQUENCE OF WITHDRAWAL OF OUT-OF- TURN-PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspector</p>

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15	Riaz Khan	DSP		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Inspectors	Confirmed Inspector Shafi Ullah is his D list colleague	<p>i. He took benefit of Cadet ship in intermediate college course vide Notification No. 2648/EC-I, dated 19.03.2007.</p> <p>ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.</p> <p><u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Inspector.</p>
17	Muhammad Yaseen	DSP		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Confirmed Inspectors	His immediate predecessor is confirmed Inspector Qazi Aslam	<p>i. He took benefit of Cadet ship in Recruit course vide No. 201/PA/S, dated 06.05.1998.</p> <p>ii. Moreover, he also took benefit of Lower college course no. 319/S, dated 25.05.2000.</p> <p><u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Inspector</p>

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18	Muhammad Ijaz Khan	DSP		Cadet Beneficiary of Standing Order No. 11/87 and 7/2003						He was confirmed by DIG Mardan understanding order 11/87. He is throughout a cadet i.e. Recruit, Lower and Intermediate College Course having lien of Mardan Region bearing No. 154/MR
19	Dost Muhammad	Inspector	Gallantry					Confirmed Inspectors	His immediate predecessor is confirmed Inspector Zahir Shah No. P/384 and his immediate successor is Inspector Ikhtiar Ali No. P/66	He was promoted as Offg: HC in case FIR No. 281, dated 18.06.1999 U/S 17 (3) PS KRS <u>CONSEQUENCE OF WITHDRAWAL OF OUT-OF-TURN PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Inspectors.
20	Nasir Khan	DSP						FRP		His lien was transferred from FRP to CCP, Peshawar as an SI vide Notification No. 22163-64/E-II, dated Peshawar on 08.10.2002. Moreover, he did not get any benefit in order of out of turn in CCP, Peshawar.
21	Shakeel Khan (Posted in CPO)	DSP						FRP		As per the record of this office he never served under CCPO.
22	Tayyab Jan	DSP						FRP	Inspector Gul Arif Retired.	Transferred from FRP vide Notification No. 25317-23/E-II, dated 14.11.2007 as an Offg: ASI and placed below the name of Gul Arif. Moreover, he did not get

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									any benefit in order of out of turn in CCP, Peshawar.	
23	Babar Khan	Sub-Inspector		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Officiating ASI	His immediate predecessor is Offg: ASI Gohar Ali No. 3450 and his immediate successor is Offg: ASI Gulzar Khan No. 1324	i. He took benefit of Cadet-ship in Intermediate college course vide Notification No. 7753/EC-I, dated 20.04.2017. ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.
									CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of ASI	
24	Muhammad Idrees Khan	Sub-Inspector		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Officiating Sub Inspectors	His immediate predecessor is Offg: SI Tariq Ahmad No. 399/P	i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 11435/EC-I, dated 17.06.2015. ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.

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									CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN-PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspectors and at the bottom of Tariq Ahmad No. 399/P	
25	Muhammad Ishaq	Sub-Inspector		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Officiating Sub Inspectors	His immediate predecessor is Offg: SI Tariq Ahmad No. 399/P	i. He took benefit of Cadet-ship in Intermediate college course vide Notification No. 11435/EC-I, dated 17.06.2015. ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.
									CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN-PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspectors and at the bottom of Tariq Ahmad No. 399/P	
26	Ali Said	Sub-Inspector		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Officiating Sub. Inspectors	His immediate predecessor is Offg: SI Qaisar Khan No.320/P	i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 11510/EC-I, dated 17.06.2015. ii. Cadetship in

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									<p>intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.</p> <p><u>CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspectors and at the bottom of Qaisar-Khan No. 320/P</p>	
27	Tariq khan	Sub-Inspector		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Officiating Sub Inspectors	His immediate predecessor is Offg: SI Qaisar-Khan No.320/P	<p>i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 11510/EC-I, dated 17.06.2015.</p> <p>ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.</p> <p><u>CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN-PROMOTION</u> His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspectors and at the bottom of Qaisar Khan No. 320/P</p>

28	Bakht Munir	Sub-Inspector		Cadet Beneficiary of Standing Order No.11/87 and 7/2003				Officiating ASI	His immediate predecessor is Offg: ASI Muhammad Usman No. 4431	<p>i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 6837/EC-1, dated 06.04.2017.</p> <p>ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.</p> <p>CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN-PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of ASI</p>
29	Abdul'Ali Shah	Sub-Inspector		Cadet Beneficiary of Standing Order No. 11/87 and 7/2003				IHC	His immediate predecessor is IHC Taimur Shah and his immediate successor is IHC Kamran Gul No. 504 dated 20.09.2012.	<p>i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 15954/EC-1, dated 16.12.2014.</p> <p>ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion.</p> <p>CONSEQUENCE OF</p>

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									WITHDRAWL OF OUT-OF-TURN-PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of IHC. He took the cadetship benefit in recruit lower and intermediate.	
30	Aurang Zeb	Sub-Inspector		Cadet Beneficiary of Standing Order No-11/87 and 7/2003				Sub Inspectors	His immediate predecessor is Offg: SI Qaisar Khan 320/P	i. He took benefit of Cadet ship in Intermediate college course vide Notification No. 21844/EC-I, dated 02.12.2015. ii. Cadetship in intermediate course helped him in acceleration of his promotion as an Offg: ASI and admission to list "E" Hence, he bypassed his batchmates and got out of turn promotion. CONSEQUENCE OF WITHDRAWL OF OUT-OF-TURN-PROMOTION His seniority falls after withdrawal of out of turn promotion in the rank of Sub Inspectors and at the bottom of Qaisar Khan No. 320/P



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

(66)

No. 11528 / Legal

dated the 08 / 12 / 2021.

To: The Regional Police Officer,
Hazara.

Annex 'R'

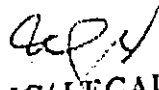
Subject: REQUEST FOR JUSTICE.

Memo: Please refer to your office Letter No. 27947/E, dated 29.11.2021, on
the subject cited above.

The perusal of record reveals that, since the establishment of FAR
rename FRP, it has its own hierarchy in wake of seniority promotions in the junior rank,
selection for course on the quota of seats of different courses to this organization allotted
by the competent authority and seniority of promotions lists ABCDE were also maintained
separately within the organization like Districts till the promulgation of Standing Order
No. 01/2014.

If the applicants qualified promotions courses on their own turn with
their colleagues and were promoted from one rank to another on the basis of seniority-
cum-fitness in accordance with Police Rules 1934 and subsequently, were placed at the
bottom of seniority list of the District of their Domicile according to their rank thus they
do not come within the ambit of out of turn promotion.

According to judgment of Apex Court if someone promoted on the basis of
any kind of incentive i.e gallantry, cadetship and special case by-passing his batch-mates/
colleagues thus it is declared out of turn promotions.


AIG/LEGAL
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
08.12.2021

Annex 'S'

3

BETTER COPY 2 (422)

GOVERNMENT OF NWFP
HOME & TRIBAL AFFAIRS
DEPARTMENT
DATED PESHAWR THE 16.1.1988

ORDER

No. SO/P-11 HD-8-10/46-149. Sanction of the Govt of NWFP is hereby accorded to the raising of Armed Reserve Police Force in NWFP comprising the following units of NWFP Police.

1. Additional Police.
2. Special Police levy.
3. PAF contingent.
4. Range Reserve Platoons.
5. Provincial Reserve Armed Platoons.
6. Frontier Armed Reserve.
7. Campus Police Corps, Peshawar University.
8. STF & ATS.
9. Mounted Police.
10. Standing Guards and Police Escorts etc. etc. including those provided to private bodies/persons.

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2. As a result of the said re-organization, sanction is recorded to the creation of the following posts with effect from 1.10.87 at a total cost of Rs.2989170/- as detailed below:-

6-222-000-total Estt. Charges		2653650/-
6-22-00-total Basic Salary		1833760/-
6-222-11-Basic Pay of officers		339600/-
One DIG (Commandant) (BPS-19)		33940/-
Five Supds. of Police (BPS-18)		109400/-
Twelve DSEs (BPS-17)		198240/-
6-222-012-pay of other staff		1484080/-
19 Inspectors (BPS-14)		167200/-
68 Sub-inspectors (BPS-11)		436800/-
71 ICs (BPS-3)		369200/-
One office Signet (BPS-16)		10800/-
One stenographer (BPS-15)		9320/-
Five stenotypists (BPS-12)		38400/-
12 Assistants (BPS-11)		87360/-
15 Senior Clerks (BPS-7)		90000/-
24 Junior Clerks (BPS-5)		134400/-
Five Peonies (BPS-2)		15000/-
12 N/Os (BPS-1)		57600/-
12 Behisties (BPS-1)		57600/-
6-222-020-total regular allowances		780000/-
022-House Rent Allowance		547330/-
027-washing allowance		14300/-
028-Dress allowance		2300/-
029-Ration allowance		130560/-
029-medical allowance		94800/-
6-222-030-total other allowances		40800/-
034-Medical charges		1800/-
036-pet fit allowances		24000/-
039-other allowances		15000/-
6-222-300-trial commodities and services		335520/-
511-T.A. (officers)		335520/-
Total		2989170/-

3. Sanction of the Govt of NWFP is also accorded to the up-gradation of 1020 posts of special Police levy from Basic pay scale 01 to Basic pay scale 02 as consequential with effect from 1.10.1987.
4. The Govt of NWFP is further pleased to abolish the posts of 7 ASIs and 279 Constables with effect from 1.10.1987 to neutralize the Audit cost of 255 cons created as above. The details of posts abolished are given in Annex-A.
5. The incursion of the staff created is shown in Annex-B. The duties and responsibilities of the now set up will be the same as those of regular Police elsewhere and services will be governed by the Police Rules or any other rules applicable to their counterpart posts in regular Police.
6. The expenditure involved is creditable to the function 6-222-provincial Police (Police proper and shall be met out of the existing budget group) for the current financial year 1987-88.
7. A token grant of Rs.10 is sanctioned to menageries the incurrence of above expenditure during the current financial year 1987-88. The different conditions imposed and other instructions issued by finance Deptt. in connection with the implementation of the above scheme will be adhered to strictly.

Sd/-
HOME SECRETARY GOVT OF NWFP
HOME AND TRIBAL AFFAIRS DEPTT.

ATTESTED
SECRETARY

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GOVERNMENT OF N.W.F.P.
Home and TRIBAL AFFAIRS
DEPARTMENT.

DAILY PESHAWAR THE 16. 1.1986

ORDER.

NO.80(P.II)HD/8-10/146-149. Sanction of the Govt; of NWFP is hereby accorded to the raising of Armed Reserve Police force in NWFP comprising the following units of N.W.F.P Police.

1. Additional Police.
2. Special Police Levy.
3. P.A.P. Contingent.
4. Range Reserve Platoons.
5. Provincial Armed Reserve Platoons
6. Frontier Armed Reserve
7. Campus Peace Corps Feshawar University.
8. Special Task Force and Anti-Terrorist Sq.ad.
9. Mounted Police.
10. Standing Guards and Police Escorts etc etc including those provided to private bodies/ persons.

2. As a result of the said re-organization, sanction is accorded to the creation of the following posts with effect from 1.10.87, at a total cost of Rs.29,89,170/- as detailed below:-

6-222-000-Total Estt:Charges		26,53,650/-
6-222-010-Total Basic Salary.		78,25,750/-
6-222-011-Basic Pay of Officers		
One DIG (Commandant)	(BPS-19)	3,39,880/-
5 Five Supts: of Police	(BPS-18)	33,040/-
12 Twelve BPs	(BPS-17)	1,08,400/-
6-222-012-Pay of Other staff		1,95,240/-
19 Nineteen Inspectors	(BPS-14)	14,84,080/-
60 Sixty Sub Inspectors	(BPS-11)	1,67,200/-
70 Seventy one Head Constables	(BPS-3)	4,35,800/-
One Office Supt	(BPS-16)	3,69,200/-
One Stenographer	(BPS-15)	10,800/-
Five Steno Typists	(BPS-12)	9,320/-
Twelve Assistants	(BPS-11)	38,500/-
Fifteen Sr Clerks	(BPS-7)	67,360/-
Twenty four Jr: Clerks	(BPS-5)	90,000/-
Five Darbaris	(BPS-2)	1,34,400/-
Twelve Naib Qanids	(BPS-1)	25,000/-
Twelve Behishtien	(BPS-1)	57,600/-
6-222-020-Tot. 1 Regular Allowances.		57,600/-
022-House Rent Allowance		7,53,050/-
027-Washing Allowance.		5,47,330/-
028-Dress Allowance.		14,300/-
029-Ration Allowance.		2,300/-
029-Medical Allowance		1,30,560/-
6-222-030-Total other Allowances		94,500/-
034-Medical charges		40,800/-
036-Out fit allowance		1,600/-
039-Other Allowances.		24,000/-
6-222-500-Total Commissions and Services.		15,000/-
511-TA(Others)		3,35,520/-
	TOTAL	29,89,170/-

3. Sanction of the Govt; of NWFP is also accorded to the Up-gradation of 1020 posts of Special Police Levy from Basic Pay Scale 1 to Basic Pay Scale 2 as Constables with effect from 1.10.1987.

Contd.....(2) "r"

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4. The Govt. of NWFP is further pleased to abolish the posts of 7 ABIs and 279 Constables with effect from 1.10.1987 to neutralize the addl cost of 255 posts created as above. The details of posts abolished are given in Annexure-1.

5. The location of the staff created are shown in Annexure-3. The duties and responsibilities of the new set up will be the same as those of Regular Police elsewhere. For its services will be governed by the Police Rules or any other Rules applicable to their counter-parts in regular Police.

6. The expenditure involved is debitable to the Function 6-232. Provincial Police (Police, Property) and shall be met out of the existing budget grant for the current financial year 1987-88.

7. A token grant of Rs. 10/- is sanctioned to reimburse the incurrence of above expenditure during the current financial year 1987-88. The different conditions imposed and other instructions issued by Finance Deptt; in connection with the implementation of the above scheme will be adhered to strictly.

HOME SECRETARIAL GOVERNMENT OF NWFP
HOME AND ... DEPTT.

Dated Peshawar on 16.1./1988

NO.7/12-B.III/ED/
Copy forwarded for information and necessary action to:-
1. The Accountant General NWFP Peshawar.
2. All Districts Accounts Officer in NWFP.

(MALKI MOHAMMAD HUSSAIN)
BUDGET OFFICER-III
FINANCE DEPTT.

Dated Peshawar, the 16.1./88

NO.SC(P.II)HD/8-10/146-148
Copy of above is forwarded for information and necessary action to:-
1. The Inspector General of Police, NWFP Peshawar.
2. The Budget Officer-III Govt; of NWFP Finance Deptt; Peshawar.
3. The Dy:Secretary Regulation-I Govt; of NWFP Finance Deptt; Peshawar.
4. The Section Officer (Police-I) Govt; of NWFP Home and TAS Deptt; Peshawar.

(ATAU CHAFOOR)
SECTION OFFICER (POLICE-II)
HOME DEPARTMENT.

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ADVOCATE

(70) ANT (15/3/88)

STANDING ORDER NO.2.

As a second step towards the Re-Organization of Frontier Armed Reserve, the following strength alongwith the equipments, likes arms and ammunition and Transport etc, etc: shall stand with-drawn from the offices noted against each placed under the administration of Commandant, Frontier Arms Reserve H.W.F.P. Peshawar with immediate effect:-

S.NO.	NAME OF FORCE.	SP	DSP	INSP	SIS	ASIB	HCS	CONST	JAM	HAV	SEP	DRAWING AND DISBURSING OFFICER.
1.	Campus Peace Corps.	1	1	5	11	5	51	290	-	-	-	Director Camp ^{us} Peace Corps Peshawar.
2.	Special Police Levy.	-	-	-	-	-	-	-	30	90	780	SsP, DIR, Bannu Kohat & Kayak

The case regarding transfer of proportionate by and declaration of Deputy Commandant, F.A.R. as Drawing and Disbursing Officer at the above staff will be decided in due course.

Sd/- (MOHAMMAD ABBAS KHAN)
Inspector General of Police, NWFP,
Peshawar.

No 2603/52 /A-5, dated Peshawar the 15.3. /1988

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

1. All Heads of Police Offices, in N.W.F.P.
2. all Branch Superintendents, in OPO, Peshawar.
3. Registrar, OPO, Peshawar.
4. Assistant Secret, OPO, Peshawar.
5. District Accounts Officers, Kohat, D.L.Khan, Bannu & Kara

(ISHAR MOHAMMAD KHAN)
DIG/HQRB:
For Inspector General of Police,
N.W.F.P. Peshawar.

~~ATTESTED~~
~~ATTORNEY~~

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B
CIRCULAR ORDER.

The Inspector General of Police, N.W.F.P. has planned to order the re-naming of Frontier Armed Reserve to Frontier Reserve Police (F.R.P) with immediate effect.

BYED MASUD SHAH
INSPECTOR GENERAL OF POLICE
PESHAWAR.

NO. 3850-3950/E-II, dated Peshawar, the 27.2.1991.

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

1. The Chief Secretary, Government of NWFP, Peshawar.
2. The Secretary to Chief Minister, NWFP.
3. The Secretary Governor NWFP.
4. The Secretary to Govt: of NWFP (S&GAD).
5. The Secretary to Govt: of NWFP, Home and TAs Deptt
6. The Commandant, Frontier Reserve Police, NWFP, Pesh
- 7.-15 All Dy:Inspectors General of Police, in NWFP.
16. The Accountant General NWFP, Peshawar.
17. All Asstt:Inspectors General of Police, in NWFP.
18. All Distt: Accounts Officers in NWFP.
19. All Supdts: of Police, PAR, in NWFP.
20. The Director, Campus Peace Corps, University Can
21. The Asstt:Commandant, RTO Sarai-Naurang.
22. The Asstt:Commandant, PAR Sub HQRS Nowshera.
23. DSP I/IO RTO, Kohat.
24. Supdt: 'G' Branch CPO.
25. Supdt: 'A' Branch CPO.
26. Supdt: 'D' Branch, CPO.

Attested
Bd/-
(ISRAR MOHAMMAD, KHAN
DIG BQRS:
FOR INSPECTOR GENERAL OF POLICE
PESHAWAR.

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ADVOCATE

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Subject:- RECRUITMENT POLICY FOR NEWLY CREATED POSTS IN POLICE.

On recommendation of a special committee constituted for the purpose, the Inspector General of Police, NWFP, has approved the following general policy for recruitment of constables against the newly created post for the various Distt./Units with effect from 1.7.1995 (Annexure A)

2. POST IN DISTRICT.

1. →

The newly created posts of Districts should be filled up from the trained personnel of FRP according to seniority educational qualification/domicile.

ii. Vacancies resulting from transfer of FRP personnel to District Police should be filled up through fresh recruitment in FRP.

iii. Personnel selected for transfer to District should be allocated to the districts of their domicile/according to the number of vacancies available in each Districts.

3. TELECOMMUNICATIONS

Since telecommunication requires technical staff the AIG(Tele) will conduct recruitment of personnel against vacancies sanctioned for his Unit. However four(4) personnel of telecommunication at present attached to I for the purpose of pay will be absorbed against these vacancies.

4. TRAFFIC POLICE.

Since no traffic course qualified officials are available in FRP, seniority cum physical and educational standard required for traffic police will apply.

Distribution of posts sanctioned for traffic Police in Coast(4-40) will be as under:-

i.	Post	HC	F.O.
ii.	Kohat	-	6.
iii.	Bannu	-	6.
iv.	Dihao	-	6.
vi.	Mardan	1	5.
ivi.	Abbottabad	1	5.
vii.	Malakand	1	6.

5. URAN, BRANDE/CID.

The vacancies against the newly sanctioned posts for the these branches should be filled up from Peshawar Distt. for lien purpose. Peshawar Distt. should be given person

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(SIKHARAJ KHALSA)
DIP/1000
For Inspector General of Police
Peshawar

No. 1715-22

Dated Peshawar the

25/11/1957

Copy forwarded to

1. The Dy:Inspector General of Police, Criminal Branch Peshawar.
2. The Commandant, FIF WFP Peshawar.
3. The Asst:Inspector General of Police, Telecommunications Peshawar.
4. The Asst:Inspector General of Police, CID, WFP Peshawar.
5. The Asst:Inspector General of Police, Traffic, WFP, Peshawar.
6. The Supt: of Police, Mardan.
7. The Supt: of Police, Dera Ismail Khan.
8. The Supt: of Police, Bahawal.
9. The Dy:Inspector General of Police, Peshawar Range Peshawar.
10. The Asst: Supt: of Police, Peshawar.

(SIKHARAJ KHALSA)
DIP/1000
For Inspector General of Police
Peshawar

OFFICE OF THE COMMANDANT, PESHAWAR
No. 524-32/10, Dated Peshawar the 22/11/1957
Copy of above is forwarded for information

- and in/section to the:-
1. All Stations of Police WFP in W.P.
 2. Dy: Supt: of Police WFP Peshawar.
 3. Asst: Commandant WFP Sub-Div: Dera Ismail Khan.
 4. Asst: Supt: of Police WFP Bahawal, to be sent to all Police.
 5. Asst: Supt: of Police, Bahawal.

dy
for

(SIKHARAJ KHALSA)
DIP/1000
For Inspector General of Police
Peshawar
R/S
25/11

Office of the Dy: Inspector General of Police
Peshawar
25/11/57

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F.R.P. STANDING ORDER NO. 1

ORGANIZATION, ROLE, DUTIES & RESPONSIBILITIES.

DEFINITION.

All terms and definitions used in Police Act, 1861 and Police Rules, 1934 or any other rules and laws of the land for Police officers posted to specialized cadres, branches of Police will mutatis mutandi apply to the members of Frontier Reserve Police.

(a) COMMANDANT.

He will be an officer of the rank of Deputy Inspector General of Police, appointed by the Government as COMMANDANT of the Frontier Reserve Police.

(b) DEPUTY COMMANDANT.

He will be a Police Officer not below the rank of Supdt. of Police, and will assist the COMMANDANT in the discharge of his duties and responsibilities.

(c) ASSISTANT COMMANDANT.

Includes Police Officer not below the rank of ASP/DSP. He will assist the COMMANDANT, Deputy Commandant and Supdt. of Police, FRP in the discharge of their duties.

(d) F.R.P. RANGE.

FRP Range includes all the districts in a particular Range or Ranges as specified by the I.G.P.

(e) MEMBERS OF F.R.P.

Include Police Officers who are posted to or enrolled in the FRP. They also include GOs serving in the F.R.P.

(f) REGULAR POLICE.

Includes officers posted to District Police, Special Branch, Crimes Branch, Traffic Police and CID and any other unit which may be added hence forth.

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(g) F.R.P. TRAINING CENTRES.

Include the premises or buildings notified by the IGP as Training Centres/ Schools.

2. The entire strength of the FRP will be grouped as under :-

- a) Active duty personnel (Regular Platoons)
- b) Administrative Platoons.
- c) Ministerial Staff.

Active duty personnel.

The entire active duty personnel will be organized into platoons and sections. A platoon shall consist of 1-4-40 (SI/ASI-1, EOs-4 & Constables - 40). The 40 constables shall include five follower constables as well. A section shall be composed of one EO and ten active duty personnel.

Three platoons shall be commanded by one Inspector and he will be designated as Company Commander.

Applicability of Rules.

According to notification No. 60(Police-II) HD/8-10/146-149, dated 16.1.1968 from Govt. of M.P., Home & T.As Deptt., the duties & responsibilities of this force will be the same as those of regular Police elsewhere and its services will be governed by Police Rules, 1934 or any other rules applicable to their counterparts in regular Police.

Duties & Responsibilities.

The duties & responsibilities of the FRP shall be to assist the regular Police in the performance of the following duties:-

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(Handwritten initials)

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- a) Anti Riot Operations.
- b) Operation against Criminal / FOs.
- c) Security of VVIPs/ VIPs.
- d) Any other duties assigned by the IGP.

(Signature)
 (S. MASUD SHAH)
 INSPECTOR GENERAL OF POLICE,
 NWFP PESHAWAR.

OFFICE OF THE COMMANDANT F.R.P NWFP PESHAWAR.

No. 5606-46/GO dated Peshawar, the 28/7 1994.

Copy of above is forwarded to all
 Heads of Police, offices in NWFP, for information and
 necessary action.

Office of the Dy. Commr
 Distt No. 2026
 Dated 3-8-94
 Dy. Commr F.R.P. NWFP PESHAWAR

(Signature)
 (MALIK NAVEED KHAN)
 DIG
 COMMANDANT F.R.P NWFP PESHAWAR

ATTESTED
(Signature)

ANNEX-1
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F.R.P STANDING ORDER NO.2

RECRUITMENT AND TRAINING.

RECRUITMENT.

All enrolment in the FRP shall be carried out under chapter-III of Punjab Police Rules as amended vide notification No. 3663-51/E-II, dated 5.3.1988 and No. 27654-89/E-II, dated 26.12.1988 and other instructions issued by the competent authority. The SP/FRP of the Range shall carry out recruitment against vacancies. Recruitment in HQ Platoons shall be carried out by the Commandant or his nominee. It shall be ensured that all the districts are represented in the HQ platoons in accordance with their population figures of the last census.

It shall be ensured that at no given time the percentage of non-matriculates (including follower constables) exceeds 15 per cent of the total strength of the F.R.P.

TRAINING.

To maintain uniformity in training of F personnel and district Police, the syllabi approved for regular Police recruits shall be followed. However, the IGP may prescribe additional courses for FRP according to the nature of their duties besides those mentioned in Police Rules, 1934 and Police Training College, Hangu manual.

The IGP shall fix the quota of seats for lower, Inter & Upper courses in accordance with the strength of FRP and by the same formula that is applicable to the District Police ranges.

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The Commandant, FRP shall then allocate these seats to the respective FRP Range / HQ according to the strength of lower & Upper subordinates in that Range/ HQ.

(S. MASUD SHAH)
INSPECTOR GENERAL OF POLICE,
NWFP PESHAWAR.

OFFICE OF THE COMMANDANT F.R.P NWFP PESHAWAR.

No. 5693-5223/GO dated Peshawar, the 31.7.1994.

Copy of above is forwarded to all Heads of Police, Offices in NWFP, for information and necessary action.

(MALIK HAFEEZ KHAN)
DIG
COMMANDANT F.R.P NWFP PESHAWAR.

Office of the Dy. Supt.
Diry No 6025
Dated 3-8-94
of Police P.A.R NO 1110

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F.R.P. STANDING ORDER NO. 3.

PROMOTIONS.

In view of the nature of the duties assi-
to the FRP, those officials who are illiterate or have
failed to qualify the promotion lists shall be promoted
the rate of 25 per cent of the posts of HCs, ASIs & C
Minimum qualification for promotion to
rank of HC shall be :-

- a) Qualified section commander's course.
- b) Physical fitness according to Police R
12-16 (i).
- c) Character roll clear of entry carrying
moral stigma.
- d) Preference shall be given to candidate
who have qualified drill course.
Minimum qualification for POs(SI/ASI)
shall be:-

- a) Service as Section Commander- 3 years.
- b) Platoon Commander course passed.
- c) Physical fitness according to Police
Rules 12.16.

3. The Commandant, FRP may constitute a
member- GOs committee to assess the performance of
Platoon commanders(SI/ASI) and HC (Section Commanders
on completion of their tenure. The committee may rec
candidates for reversion or promotion to the rank of
SI/ASI/HC in the FRP. These will include drill staf
and drop outs from A-I, B-I, lower and Intermediat
courses.

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However, the following factors shall be taken into consideration while granting extensions.

- a) Retirement of the incumbent in the same rank.
- b) Length of service of the next incumbent.
- c) Status of next senior incumbent as he may be deprived of promotion due to granting of extension.

S/o

Chapter 13 of Police Rules, 1934 read with some orders Nos. 10 and 11 of 1987 shall govern the system of promotion and maintenance of promotion lists. However, those constables who have not passed the lower school course in Police Training College, Madurai but are otherwise considered suitable may with the approval of Commandant, Madurai be promoted as Constables upto a maximum of 10 per cent of the same posts. In this connection the following shall be criteria for promotion :-

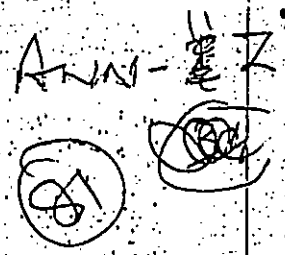
- a) Physical fitness according to Police Rule 12-16(d).
- b) Qualified in drill instructor course.
- c) Qualified in section commander course.
- d) Character roll clear of entry carrying moral stigma.
- e) Qualified Gas Course.

Office of the Dy. Superintendant
 District No. 1024
 Dated 3-8-84

(Sd/-)
 INSPECTOR GENERAL OF POLICE,
 I.S.P. Madurai.

OFFICE OF THE CHIEF CLERK, I.S.P. Madurai.

ATTESTED
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From:- The Commandant, Police Training College Hangu.
 To:- 1. The All D. Is. C in N.W.F.P.
 2. The Commandant, FRP, NWFP, Peshawar.
 3. The All Districts Superintendent of Police, in N.W.F.P.
 4. The Director C.P.C University Campus Peshawar.

HO 3271-3800 / Dated Hangu, the 19/6/1996

Subject:- ALLOTMENT OF SEATS IN VARIOUS COURSES
MEMORANDUM

Please refer to this office Memo. No. 1996-2077, dated 19.5.1996.

The allotment of seats in the various courses to P.T.C Hangu has been tabulated vide Rule No. 1 (ii) (iii) and (iv) of the P.T.C. Manual. No criteria whatsoever has been laid down for such allotment, and the PTO authorities have made the below yard stick for allocation of quota of seats in the Lower, Intermediate and Upper School Courses.

1. Lower School Course 1/20th of the sanctioned strength of H.O. of the Ranges.
2. Intermediate Course 1/20th of the sanctioned strength of ASIs of the Ranges.
3. Upper School Course 1/20th of the sanctioned strength of S.Is. of the Ranges.

Based upon the above formula sufficient seats had been allocated to all Ranges. But certain Ranges, IRP & CPC Organisation etc were frequently making correspondence of their officials turning overage. As such this Institution on account of construction of new Academic Block, reviewed the matter and the seats in various courses has been increased as below, duly approved by the IGP/NWFP, Peshawar:-

S/No.	Range/Units	Lower Course	Inter Course	Upper Course
1.	Peshawar	37	24	9
2.	Mardan	11	12	2
3.	Kohat	11	7	2
4.	Bannu	11	12	3
5.	D.I. Khan	8	4	1
6.	Mulakand	30	16	7
7.	Mazara	16	9	4

Cont'd.../P-2

ATTESTED
 ADVOCATE

It is requested that necessary amendment may please be made and the selection for the courses may please be made accordingly. In case of an increase in the strength of Range/District etc letter No. 1187, the case may please be referred to this office for consideration of the Inspector General of Police, NWFP, Peshawar.

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(PACED & RECORDED)
COMMANDANT,
Police Training College,
H a n g u.

No. 3291

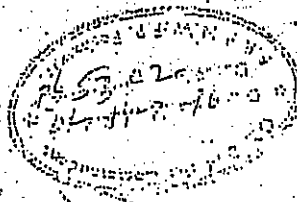
Copy submitted to the Inspector General of Police, NWFP, Peshawar with reference to his office Memo No. 1187/P-I, dated 13.6.1996. The relevant rules of PTC Manual have been amended accordingly.

(PACED & RECORDED)
COMMANDANT,
Police Training College,
H a n g u.

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S/No.	Range/Units	Lower Course	Inter Course	Upper Course
8	T.O./R.M.	5		
9	P.R.P.	2	3	
10	C.P.O.	2	2	1
11	Asst. Kashmir	1	1	1
12	Other Province	20	1	
13	Bureau	1	20	6
Total:-		166	112	36

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FROM:

The Provincial Police Officer,
H.W.P.F., PESHAWAR,
The Commandant,
F.R.F., NWFP, Peshawar.

TO:

No. 2526

/P-II, Dated Peshawar, the 16/2/2007.

SUBJECT:-

REGULARIZATION OF PROMOTION ORDERS
OF FRP LITERATE OFFICIALS.

MEMO.

dated 1-7-2006.

Please refer to your Memo.No.4048/EO.

The suggestion regarding promotion order of FRP literate official received with your memo under reference had been put up to the D.P.O. The D.P.O. thoroughly discussed the issue and opined that as the Police rules chapter 13 is in detail and very clear that no Constable/Head Constable be admitted in List-D who is not thoroughly efficient in all branches of the duties of the Constable and Head Constable of established integrity. The FRP is also transit force and the officials are being transferred after 5 yrs service to their domicile District. Therefore, the quota of the lower college course, intermediate college course and upper college course may be withdrawn. However, since there are some districts i.e. Charsadda, Marjan and Bannu etc, where the number of Constables are out number of the districts, in those cases the Commandant FRP will issue guide line and circulate to the DPC for approval.

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Date 16/2/07
D.P.O. Peshawar

for Provincial Police Officer

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ADVOCATE

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT PESHAWAR
JUDICIAL DEPARTMENT

JUDGMENT



WP No 615-07 of 2007.
Date of hearing 20.3.2008.
Ali Hassan petitioner No.1 and Tayyeb Jan petitioner No.4
are present in person.
Mr. Muhammad Saeed Khan, Addl. A.G. along with Mr. Saadat Mehdi,
DSP for the respondents.

MUHAMMAD RAZA KHAN, C. J. This order shall also be
deemed to be an order in the connected Writ Petitions No.1616 and
1617 of 2007 as the identical questions are involved in all these cases.
Through these Constitutional Petitions the petitioners have challenged
the letter dated 16.2.2007, whereby the suggestion relating to the
promotion order of Frontier Reserve Police (FRP) literate officials,
moved by the Commandant FRP, was considered by the DPC and it
was held that under Chapter 13 of the Police Rules no constable/head
constable can be admitted to list 'D' unless he is thoroughly efficient in
all the branches of duties of the Constable/Head Constable. The
reasons advanced in the impugned letter for declining the proposal, was
that FRP is a transit force and the officials are transferred to their
districts of domicile after five years.

In the comments the respondents No.1, 2 and 3 have
admitted that some of the employees of FRP were erroneously
promoted and when the matter came to the notice of the concerned
authorities they placed it before the DPC where the said order was

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passed which is in accordance with the police rules applicable to the police establishment.

3. The petitioners contend that they had been appointed in the reserve police and they had been serving for a period ranging between 15 to 20 years and that their colleagues have been upgraded and promoted to senior positions, but the refusal to place them in 'D' list and to promote them, shall adversely affect their service interest amounting to discrimination. It was claimed that their colleagues in FRP have been given accelerated promotion and most of them are presently working as ASIs and SIs despite the fact that they were recruited alongwith the petitioners.

4. We feel that apparently the FRP is now a regular establishment and no more a transit force and there is no proof that the personnel working therein was temporarily posted for five years, therefore, the discriminatory treatment, meted out to them, is violative of the fundamental rights, particularly when they will be placed at an extra-ordinary junior position if transferred to the Districts and enlisted there on the basis of their length of service and experience in all branches of police force. In any case, since the petitioners have not been transferred out of the Frontier Reserve Police within the prescribed period of five years, as stated in the impugned order, therefore, a mistake on the part of the concerned authorities cannot put the petitioners in an adverse situation and they cannot be penalized for the fault of the others. Moreover the decision to rectify a wrong practice shall definitely operate prospectively and it cannot be applied to the

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petitioners retrospectively who had been recruited in FRP and had been continuously serving the department for over fifteen years.

We, therefore, direct that the case of the regularization, promotions and opportunities for enlistment in the intermediate course etc., shall be re-examined at a higher level under the supervision of the Provincial Police Officer and the decision dated 16.2.2007 may be re-considered by the concerned DPC so that nobody should be discriminatively deprived of his legal rights and that no decision be made operative retrospectively damaging the members of the discipline force who have to perform extra-ordinary duties and who deserve to be adequately compensated and encouraged. The re-consideration process be finalized within a period of two months and the result thereof be communicated to the petitioners and a report may be forwarded to the Registrar of this Court. With these observations these petitions are

disposed of. *W/- Muhammad Raza and others*
vs
RA-FRP/RA-Reliance

Announced:
Dated 20.3.2008.

[Signature]
CERTIFIED TO BE TRUE COPY
Examiner
Peshawar High Court
Authorized Under Section 79

5409
Date of Presentation of Application 20/3/08
No of Pages 11
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 14/05/2008

**MINUTES OF DEPARTMENTAL SELECTION COMMITTEE HELD ON 14.05.2008
 IN THE CONFERENCE ROOM OF CPO, PESHAWAR.**

A meeting of Departmental Selection Committee was held on 14.05.2008 at CPO Conference

Room: The following officers attended the meeting.

- | | | |
|---|---|----------|
| 1 | Mr. Khurshid Alam Khan
Addl. Inspector General of Police,
HQs: NWFP, Peshawar. | CHAIRMAN |
| | Mr. Fazl Ahmad Khan
Addl. IGP/Investigation NWFP,
Peshawar. | Member |
| 3 | Mr. Faqir Hussain
Deputy Inspector General of Police,
Investigation Peshawar. | Member |
| 4 | Mr. Abdul Wadood Shah
Commandant ITC,
Hangu | Member |
| 5 | Mr. Attaullah Wazir
Capital City Police Officer,
Peshawar. | Member |
| 6 | Mr. Amir Hamza Malik
Deputy Inspector General of Police,
Special Branch NWFP, Peshawar. | Member |

The following miscellaneous cases were discussed in the DPC meeting and recommendation made regarding each case:

Seniority case of Inspector s now DSSP Khurshid Ahmad & Sarfaraz Threen of Hazara Region

Vide No. 19615-A/GB dated 18.12.2007 DPO Manshra has submitted representation for restoration of correct seniority in the seniority list over which the W/PPO NWFP Peshawar directed AIG/Legal CPO, Peshawar to please examine and offer comments and made the remarks that if seniority has been restored to other officer who were not recommended initially, while the petitioner has been left and not given seniority. Is it not discrimination? AIG/Legal submitted the following note:-

"Relevant record in the light of points raised by petitioner Muhammad Khurshid, DSI/SDPO Oghi, District Manshra, was checked. It revealed that Petitioner alongwith 11 other colleagues was appointed as ASI during the year 1975. According to seniority list of SIs of Hazara Region as it stood on 31.12.92 issued vide DIG/Hazara notification No. 5358/E dated 29.06.93, the name of Petitioner Muhammad Khurshid exists at Serial No. 19 above the name of all his colleagues mentioned in the representation.

During the year 1984 recommendation in respect of suitable officers for admission to list "F" were asked by the CPO vide signal No. 1055-60, dated 21.01.84. At that time the Petitioner was serving in District Manshra. Out of 12 SIs only one SI Naseem Afzal of District Abbottabad was recommended for promotion list "F" by the DIG/Hazara vide letter No. 8684/E, dated 08.07.84 on the basis of recommendations received from the District concerned.

The case of Naseem Afzal was discussed in the meeting of DPC and he was brought on promotion list "F" vide Notification No. 23685, dated 30.12.1984

On the recommendation Roll i.e. Form 13.15 of Khurshid Khan which is on his record, the DIG/Hazara has mentioned that due to adverse remarks in his ACR for the year 1984 he is not recommended for list "F" and he was also kept under observation for a period of 6 months.

Petitioner Khurshid Ahmad Inspector submitted numerous applications, which were considered and rejected. Besides discussion of his case in DPC meeting on 23.02.2008, his case was again discussed in the DPC on 16.3.2002 but was referred to the DIG/Hazara for comments. On receipt of comments, the case was again placed before the DPC in its meeting held on 12.5.2004 but his claim was rejected on the grounds that he was not recommended by DIG/Hazara in the year 1984. This decision of the DPC was conveyed to the petitioner vide letter No.

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10008/E-11 dated 05.06.2004.

Another representation of Inspector Sarfraz Tareen through his mother was also received from the C.M. Secretariat NWFP, with the following remarks of the Chief Minister NWFP:

LG (P)

"Please look into personally and ensure that seniority list of the Police Department is free from controversies."

In this representation it is stated that the competent authority had allowed to assign him revised seniority vide notification No. 3917-78/E-11, dated 26.02.1996 by placing his name below the name of Inspector Muhammad Ilyas but this decision of the competent authority has not been implemented so far. He has also preferred an appeal to the NWFP Service Tribunal which is still subjudice.

Cases of both officers were thoroughly examined by the DSC and it is recommended that as their clearness have repeatedly been rejected by the DPC hence they should get remedy from the Court as it is time barred now.

SI Muhammad Iqbal while posted as MMPI DIKhan was reverted as SI to his substantive rank by the DIG/DIKhan duly approved by the PPO on complaint of corruption. Departmental Enquiry was initiated against him but he was exonerated from the charges levelled against him. Therefore, he submitted application for promotion as Offg. Inspector. The case was referred to the DPC and the DPC recommended that as his ACR is adverse therefore, his name may also be removed from list. He preferred an appeal in the Service Tribunal NWFP Peshawar which was accepted in his favour. The Deptt. went for filing appeal in the Apex Supreme Court of Pakistan through Advocate General, but the Advocate General reported that the case is not fit for appeal, hence the decision of the Service Tribunal was implemented. He represented for promotion as Offg. Inspector. His case was again placed before the DPC. The DPC thoroughly examined his case and recommended that the Advocate General may be addressed through Home Department for comments to intimate reasons for not filing of appeal so that instructions are issued to all concerned.

In pursuance of the decision of the DPC vide Memo No. 17188/E-1 dated: 25.07.2005 section Officer (Judicial) Govt. of NWFP Home & T.As Deptt. Peshawar was accordingly addressed.

The Section Officer Litigation Govt. of NWFP Law Parliamentary Affairs & Human Rights Department Peshawar vide his letter No. Lit/D/1-9 (180)/Home/2006/17901-02 dated 09.08.2007 has submitted copy of letter of Advocate General NWFP Peshawar letter No. 7415-16/AG dated: 05.10.2006 stating that the learned A.O.R. and Mr. Khushdil Khan Addl. Advocate General have examined the case and both have found it unfit. Detail comments furnished by the law officer were also sent with the letter.

An Office note was put up to the high ups and Addl. IGP/HQRs ordered it to be examined by DPC. The DPC thoroughly examined his case and recommended him for promotion subject to good ACR for the year 2006.

ACK for the year 2006 received and put up before the high ups and the Addl. IGP/HQRs NWFP approved his promotion. His promotion order was issued vide this office Notification No. 22685-88/E-11 dated: 02.10.2007.

Now the District Police Officer DIKhan vide his Memo No. 2639 dated: 09.10.2007 has submitted his representation requesting for placing his name at proper place according to due seniority.

His representation was referred to DSC.

DSC thoroughly examined the case and recommends that his name may be placed at his original place in the seniority list of Inspectors.

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Seniority case of
Inspector Muhammad
Iqbal of DIKhan
Regd.

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Seniority case of Inspector Murad Ali of Mardan Region

The DIG/Mardan Region-1, vide his Memo No. 5797/ES dated: 10.10.2007 has submitted an application requesting for granting seniority into promotion list "F"

From Para -1 to 5 the applicant has given his particulars; while in Para 6 of his application he stated that his colleagues Abdul Qayum has jumped in the seniority list and has been placed at S/No. 52, while the applicant has been placed at S/No. 109 of the seniority list of Inspector issued by CPO vide No. 2406/E-11 dated: 14.02.2007

The Service particulars of Inspector Abdul Qayum and representationist are as under:-

S/No	Name	Date of Appointment	Date of Conf: as SI	Date of Adm. to list "F"	Date of Prom: as Offg: Inspector	Date of Conf: as Inspector
1	Insp: Abdul Qayum	10.04.77	22.07.90	03.11.96	24.05.99	16.07.2005
2	Inspector Murad Ali	14.12.73	01.11.95	19.09.97	23.06.2001	16.07.2005

An office note was put up to high ups, whereupon Addl: IGP/HQRs NWFP Peshawar ordered to refer it to the DSC.

DSC thoroughly examined and found the claim of petitioner unjustified.

Commandant PTC Hangu submitted representation of Inspector Legal Altaf Hussain requesting for correction of his seniority into promotion list "F" after the name of Inspector Legal Hidayat Shah at S.No. 21 of seniority issued vide No. 649-51/E-11 dated: 10.01.2008.

The case was put up to high ups upon which Addl: IGP/HQRs ordered to refer it to DSC.

The DSC examined and found that in this connection a case is subjudice in the Supreme Court therefore it may be kept pending till the decision of court.

Seniority case of Inspector Legal Altaf Hussain of DI Khan Region

Confirmation case of Inspector Aamir Shahzad of CCP Peshawar

Inspector Aamer Shahzad of CCP/Peshawar has submitted an application stating that due to his illness he was on Ex-Pakistan Leave. For confirmation as Inspector 2 years probation period is required. He has completed 22 months period lacking just 2 months in the period.

He requested to consider his case in DPC and he may be confirmed as Inspector.

An office note was put up to high ups and the worthy Addl: IGP/HQRs NWFP ordered it to be examined by the DSC.

DSC examined his case and recommends his name for confirmation as Offg: Inspector with his colleagues.

Seniority case of Inspector Hidayatullah of DI Khan Region

DIG/Bannu has submitted representation of Inspector Hidayatullah No. D/S of Bannu Region for assignment of revised seniority into promotion list "F" over which comments were asked from DIG/DI Khan which received and put up to the high ups. Upon which Addl: IGP/HQRs ordered to keep pending the case till the decision of appeal subjudice in the Service Tribunal.

Now vide No. 9951-52/E-1 dated: 24.04.2008 a copy of judgment of Service Tribunal NWFP received wherein the respondent Deptt: is directed to decide the departmental appeal of the appellant within one month.

An office note was put up to high ups and the worthy Addl: IGP/HQRs NWFP ordered to be examined by the DSC.

DSC thoroughly examined his case and found no plausible grounds for assignment of revised seniority into promotion list "F"

Case for promotion of ERP Personnel

The Govt. of NWFP, had established a force namely Frontier Armed Reserve during the year 1986. On 16.01.1988, Additional Police, Temporary Staff, PAF Contingents, Striking force and Mounted Police were absorbed in Frontier Armed Reserve vide Govt. of NWFP, Home and TAs Department Notification No. SO(Police-1)11D/8-10/146-149 dated 16.01.1988 and decided that the duties and responsibilities of new set-up will be the same as those of REGULAR POLICE elsewhere and its services are governed by the Police rules 1934 or any other Rules applicable to their counterpart in the Regular Police. Therefore promotion from one rank to another and from one grade to another shall be in accordance with Chapter 13 of Police Rules.

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Later on in 1991, the name of the force FRP was converted into Frontier Reserve Police. In the year 1994 a Standing Order No. 3 was framed by the Police Chief for the promotion of illiterate constable of FRP to MC, ASI/PC or SI/PC. The same Standing Order was revised during the year 1999, where in its 1st para it was highlighted that list A, B, C, D and E shall be kept in the office of Commandant, FRP, NWFP, for the purpose of the promotion of literate subordinates.

Due to some misunderstanding authority issued promotion orders to illiterate subordinates as ASI/PC and SI/PC on temporary basis. Many of them were given promotion from the rank of Head Constable (BPS-7) to SI/PC (BPS-14) for the period of two years, which is against the Police Rules, Standing Order No-3/1999-20/1999, 1/2006 and instructions issued by the Govt. of NWFP, Home Department.

Frontier Reserve Police was temporary force up to 30.06.2003 therefore no confirmation against any rank was made previously. On 01.07.2003 the temporary posts of FRP were converted into permanent status by the Provincial Govt. Therefore promotion orders of literate officials are required to be regularized as per Police Rules from their due dates.

The case was put up to the DPC. The DPC thoroughly discussed the issue and opined that as the police rules chapter 13 is in detail and very clear that a constable / head constable be admitted to list D who is not thoroughly efficient in all branches of the duties of the constable and head constable of established integrity. The FRP is also transit force and the officials are being transferred after 5 years service to their domicile District. Therefore, the quota of the lower college course, intermediate college course and upper college course may be withdrawn. However, since there are some districts i.e. Charsadda, Mardan and Bannu etc. where the number of constables are out number of the districts and in those cases the Command FRP will issue guide line and circulate to the DPC for approval.

Number of officials/officers of FRP challenged this decision of the DPC. Now the Commandant FRP reported that Constables were enlisted in FRP up to the year 2003, who were given promotion after fulfilling the required condition for promotion as per Police Rules, as they were serving in FRP with their lien and order to implement decision of the DPC dated: 14.12.2006, they will be deprived from their legal rights, leading to the litigation. The Commandant FRP requested for reconsideration of the case by the DPC.

An office note was submitted to the high ups for orders, which was marked to DPC to examine the case and make recommendation (s).

The DPC examined the case very thoroughly and recommended that the previous decision of DPC shall stand however, a committee may be constituted of the following officers to examine the case in the light of representation received and recommendation made by Commandant FRP and submit detail report with specific recommendation for consideration in the next meeting of the DPC.

- | | |
|---|----------|
| 1. Mr. Faqir Hussain, DIG/Inquiries & Inspections CPO | Chairman |
| 2. Mr. Fasih ud Din, Deputy Commandant FRP NWFP | Member |
| 3. Mr. Liaqat Ali Khan, AIG/Legal CPO | Member |
| 4. Mr. Abdul Malik Khan, Registrar CPO | Member |

The above mentioned committee's meeting was held on 18.08.2007 at Peshawar and its recommendations are reproduced below:-

"At the outset, Liaqat Ali Khan, AIG/Legal informed the participant that the issue of promotion of FRP personnel has already been considered in DPC meeting held on 14.12.2006. As per decision of the DPC meeting, all literate subordinates of FRP will be transferred to their domicile districts. He further added that duties in FRP does not fulfill the requirement of promotion as per police Rules, so quota of various courses allowed to FRP, was withdrawn on the recommendation of DPC.

Abdul Malik Khan, Registrar, CPO endorsed the views of AIG/Legal and stated that all literate officials of FRP may be transferred to their respective districts as per decision taken in the DPC. He further added that FRP is a transit force therefore, their promotion can not be regularized as per police Rules.

Faqir Hussain, Commandant FRP, Chairman of the committee told the meeting that FRP has been given permanent status in 2003. However, the Chairman agreed with the views of both the members. But he further added that on transfer to respective districts, no one is deprived from his due right/seniority.

After detailed discussions, the committee reached at the conclusion that

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Senior Head Constables and ASIs of FRP may be transferred to their domicil districts, to settle the issue once for all. The Commandant, FRP office will provide the names to CPO for further necessary action. However their names will be placed in the D on the merit of the year in which he passed the Intermediate Class Course.

All the literate HCs, ASIs were duly transferred to their respective domicil Districts.

Aggrieved to this Ali Hassan etc filed a writ petition before the Honourable High Court Peshawar. The honourable Peshawar High Court Peshawar while disposing of the writ petition passed the following order on 20.03.2008

"We feel that apparently the FRP is now a regular establishment and is no more a transit force and there is no proof that the personnel working therein were temporarily posted for five years, therefore, the discriminatory treatment meted out to them, is violative of the fundamental rights, particularly when they will be placed at an extra-ordinary junior position if transferred to the District and enlisted there on the basis of their length of service and experience in all branches of police force. In any case, since the petitioners have not been transferred out of the Frontier Reserve Police within the prescribed period of five years, as stated in the impugned order, therefore, a mistake on the part of the concerned authorities cannot put the petitioners in an adverse situation and they cannot be penalized for the fault of the others. Moreover the decision to rectify a wrong practice shall definitely operate prospectively and it cannot be applied to the petitioners retrospectively who had been recruited in FRP and had been continuously serving the department for over fifteen years.

We, therefore, direct that the case of the regularization, promotions and opportunities for enlistment in the intermediate course etc, shall be re-examined at a higher level under the supervision of the Provincial Police Officer and the decision dated 16.02.2007 may be re-considered by the concerned DPC so that nobody should be discriminatively deprived of his legal rights and that no decision be made operative retrospectively dimming the members of the discipline force who have to perform extra-ordinary duties and who deserve to be adequately compensated and encouraged. The re-consideration process be finalized within a period of two months and the result thereof be communicated to the petitioners and a report may be forwarded to the Registrar of this Court. With these observations these petitioners are disposed of."

The case was examined by the DSC in its meeting held on 14.05.2008 and it was decided to constitute a Committee comprising DIG/Investigation, AIG/Legal CPO & Registrar CPO to examine the case and submit detail report to next DSC meeting.

Inspector Riaz Ahmad of Special Branch (CM Squad) has submitted an application for assignment of seniority into promotion list "F" on the analogy of Court order passed in case of Inspector/DSP Shafiullah and others of Malakand Region. The CPO Peshawar vide No. 5327/E-II dated: 14.03.2007 had intimated that a case of Haji Bahadur Khan and 6 others against Shafiullah and his colleagues was subjudice in Service Tribunal Peshawar and directed to wait till the decision of the court.

According to the representationist now the case of Haji Bahadur Khan and others has been decided in favour of Shafiullah Khan Inspector/DSP and his colleagues. He requested that he alongwith his colleagues may be assigned seniority on the same analogy in light of Court decision (Service Tribunal NWFP) dated: 12.03.2005 i.e. confirmation as ASI from the date of their appointment, because in 1984 and 1992 direct appointed ASI have shown senior to them.

An office note was put up and the case was ordered to be placed before the DSC.

DSC examined the case in detail and decided that he should get remedy from the court.

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Seniority case of Inspector Riaz Ahmad of Malakand Region

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Seniority case of
Inspector Zia Hussain of
DIKhan Region Now
ACE/NWFP Peshawar

Vide Memo No: 1010/ACE dated 29.02.2008 Director ACE/NWFP Peshawar submitted an application of Inspector Zia Hussain D/3 of DIKhan requesting for confirmation as Inspector over which comments of DIG/DIKhan were asked vide this office Endst. No. 4650/E-II dated 05.03.2008.

Vide Memo No: 702/ES dated 13.03.2008, DIG/DIKhan submitted his comments stating that SI Zia Hussain No. D/3 of DIKhan Region now on deputation to ACE/NWFP was transferred to Special Branch NWFP from DIKhan District on 14.05.2003. During his posting in the Special Branch NWFP he was selected for UN Mission abroad to Kosovo where he spent one year i.e. from 13.08.2003 to 13.08.2004. He returned back from Kosovo on 14.08.2004 and remained posted to Special Branch NWFP. His total service in Special Branch NWFP including one-year period of UN Mission is 03 years.

He applied for confirmation as SI with the contention that he has completed 03 years tenure in Special Branch NWFP as per instructions and as such full filled the condition for confirmation in the rank of SI. In this connection, no specific rules/instructions were available on the subject whether the period he remained on UN Mission abroad to be counted toward his posting in Special Branch or otherwise.

DIG/DIKhan further reported that the case was referred to PPO/NWFP Peshawar vide this office Memo No. 638/ES dated 23.05.2006 that one year period of UN Mission abroad i.e. from 13.08.2003 to 13.08.2004 be counted toward his posting in the Special Branch on deputation or other wise, so that his case for confirmation could be finalized. The PPO/NWFP Peshawar vide his Memo No. 10204/E-II dated 06.06.2006 intimated as under:-

Period on UN Mission can not be counted as period in Special Branch NWFP. So he completed one year more in Special Branch NWFP and was promoted on two years probation in the rank of SI with effect from 16.07.2005 on the available vacancy in DIKhan Region after completed 04 years service in Special Branch including one year UN Mission vide this office Endst. No. 1406-7/ES dated 19.05.2007.

He was confirmed in the rank of SI from the same date i.e. 16.07.2005 after counting his remaining officiating period toward probation under police rule 13-B vide this office Endst. No. 1530-31/ES dated 01.06.2007.

His P-list promotion recommendation case was submitted to CPO/NWFP vide this office Memo No. 1537/ES dated 06.06.2007. On the direction of PPO/NWFP Peshawar letter No. 17599/E-II dated 30.07.2007, the date of confirmation as SI was revised as 01.07.2007 instead of available vacancy i.e. on 16.05.2005 and revised confirmation order was issued on 01.07.2007 instead of 16.05.2005 vide this office order Endst. No. 26.07-8/ES dated 06.10.2007.

An office note was put up before High ups and the case was referred to Departmental Selection Committee.

Departmental Selection Committee examined the case did not agree with the contention of petitioner for assignment revised seniority as he was not completed three years tenure in Special Branch physically during the period i.e. 14.05.2006.

Four (4) Vacancies of MVEs are lying vacant in NWFP Police.

In order to fill up these vacancies by the candidates of Automobiles and Diesel Engine Diploma holders.

Establishment Department Govt. of NWFP Peshawar addressed the PPO for the views regarding the adjustment of Mr. Inayatullah, Unit Supervisor (BS-11) District Tank now in Surplus Pool, office of the Assistant Agriculture Engineer DIKhan.

The case was put up to high-ups on which the Addl. IGI/ICQRs ordered to place it before DSC.

DSC examined and decided that comments of the AIG/Traffic may be obtained in this regard.

Adjustment of Mr.
Inayatullah as MVE in
Police Department.

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Promotion of Inspector
FSL to the rank of
DSP/FSL.

Mr. Inamullah Khan, Inspector (FSL) is a senior most Inspector of FSL (Chemical Section) as per seniority list. He is required to be promoted as DSP/FSL on a post of Mr. Ahmad Mustafa, DSP/FSL, who was compulsory retired after departmental proceeding against him.

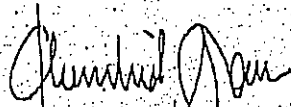
Mr. Ahmad Mustafa, DSP/FSL, went in appeal to the Chief Secretary, NWFP which was rejected. He preferred appeal in NWFP Service Tribunal which was disposed of by directing the Department for de novo proceedings. At present the department went in appeal before the Supreme Court of Pakistan against the said judgment of NWFP Service Tribunal which is subjudice.

According to the seniority list following are the senior most Inspectors amongst whom one of the Inspector is required to be promoted for regular promotion as DSP/FSL or otherwise.

1. Mr. Inamullah, Inspector FSL.
2. Mr. Muhammad Zeb, Inspector FSL.

The DPC is requested to examine the case of promotion of one of the Inspector to the rank of DSP/FSL (Chemical Section) BS-17.

DSC examined the case and recommends the name of senior most Inspector Mr. Inamulla for promotion as DSP/FSL (BPS-17) on acting charge basis till the decision of case in the apex court. If the decision came in favour of Ahmad Mustafa DSP, then he will have to be reverted.



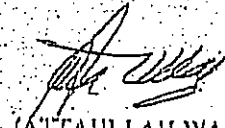
(MR. ICHURSHED ALAM KHAN)
CHAIRMAN

Addl. Inspector General of Police,
HQs: NWFP, Peshawar.



(IJAZ AHMAD KHAN)
MEMBER

Addl. Inspector General of Police,
Investigation NWFP, Peshawar.



(ATTAULLAH WAZIR)
MEMBER

Capital City Police Officer,
Peshawar.



(F. QADIR HUSSAIN)
MEMBER

Deputy Inspector General of Police,
Investigation NWFP, Peshawar.



(ABDUL WADOOD SHAH)
MEMBER

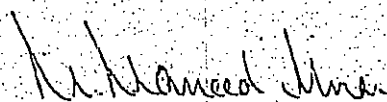
Commandant Police Training
College, Hangu

Approved

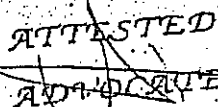


(AMIR HAMZA MATISUD)
MEMBER

Deputy Inspector General of Police,
Special Branch NWFP, Peshawar.



(MALIK NAVEED KHAN)
PROVINCIAL POLICE OFFICER, NWFP,
PESHAWAR.

ATTESTED


79-29/07 ANN-107-2
**MINUTES OF DEPARTMENTAL SELECTION COMMITTEE HELD ON 07.05.2009
 IN THE CONFERENCE ROOM OF CPO PESHAWAR.**

A meeting of Departmental Selection Committee was held on 07.05.2009 in CPO Conference Room. The following officers attended the meeting.

- | | | |
|---|--|----------|
| 1 | Mr. Abdul Latif Khan
Addl: Inspector General of Police,
Operations NWFP, Peshawar. | CHAIRMAN |
| 2 | Mr. Abdul-Majeed Khan Marwat
Addl: Inspector General of Police,
Headquarters NWFP, Peshawar. | Member |
| 3 | Mr. Faqir Hussain
Deputy Inspector General of Police,
Enquiry & Inspections NWFP, Peshawar. | Member |
| 4 | Mr. Abdul Wadood Shah
Cominadant PTC,
Hongir. | Member |
| 5 | Mr. Safwat Ghayur
Capital City Police Officer,
Peshawar. | Member |
| 6 | Mr. Khalid Masud
Deputy Inspector General of Police,
Operations, NWFP Peshawar. | Member |
| 7 | Mr. Altaullah Wazir
Commandant FRP NWFP Peshawar. | Member |

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The following miscellaneous cases were discussed in the DSC meeting and recommendations made against each case.

Confirmation case of
Inspector Bakht Zada
No. M/33 of Malakand
Region

Director ACE NWFP Peshawar has forwarded an application of Inspector Bakht Zada No: M/33 requesting therein for confirmation as Inspector.

His case for confirmation as Inspector was discussed by the DSC in meeting held on 30.04.2008 and was deferred due to incomplete ACRs.

Superintendent Secret & Training CPO submitted synopsis of ACRs for years 2002 to 2007. His ACR for the year 2006 sent to the then PPO/NWFP Mr Rifaq Pasha for countersignature.

DSC thoroughly examined his case and recommended him for confirmation as Inspector with his colleagues.

Case of Inspector Umar
Daraz of
CCP/Peshawar

The Capital City Police Peshawar vide No. 13128/EC-I dated: 16.12.2008 has forwarded application of Inspector Umar Daraz Khan, stating therein that his name may be included into seniority list of Inspector between the name of Inspector Ashraf Zaman and Gulma Khan at S/No. 2 & 3. His application was endorsed Commandant FRP NWFP Peshawar for comments vide No. 34207/E-II date 30.12.2008.

The Commandant FRP vide his Memo No. 946/EC dated: 09.02.2009 has intimated that Inspector Umar Daraz was enlisted as constable in FRP/NWFP on 01.01.1987. He qualified Lower School course during the term ending 29.10.199 and intermediate College Course during the term ending 23.08.1999, he has been

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promoted as HC on 30.01.1989 SI/PC on 04.06.1992 and Inspector on 21.04.1993 by the Commandant FRP. His name was brought on promotion lists "D" and "E" on 10.10.1997 and 11.04.2000 respectively by the Commandant FRP. He was reverted to the rank of HC on 25.04.2003 and dismissed from service on 16.07.2003. Later, upon lodging an appeal in the NWFP Service Tribunal NWFP he was re-instated with all back benefits by service Tribunal NWFP and honorably acquitted by the Special Anti-Corruption Judge NWFP, Peshawar in the criminal case registered against him.

His case for inclusion of his name into promotion List-F and promotion to Inspector was recommended by Commandant FRP NWFP Peshawar vide his Memo No. 11/PA dated 24.01.2003, but soon after his reversion to the rank of HC & dismissal, recommendation for promotion list "F" were withdrawn by the Commandant FRP.

The case was put up before the high ups which was marked to DSC.

His case was thoroughly examined by the DSC and marked to sub-committee consisting of the following officers to submit legal suggestion to next DSC meeting.

1. Mr. Qudratullah Khan, DIG/Investigation, NWFP Peshawar.
2. Mian Khurshid Anwar, AIG/Legal CPO, Peshawar.
3. Mr. Abdul Malik Khan, Registrar CPO, Peshawar.

The DIG/Mardan vide his Memo No. 5437/EC dated 11.11.2008 has forwarded application of Inspector Muhammad Ashfaq acting DSP/HQs Mardan for seniority into promotion list "F" according to date of confirmation as SI and requested for placing his name above the name of Inspector now DSP Akhtar ul Iman.

The case was referred to the DSC.

The case was examined in the DSC and rejected the representation having no merit.

Commandant PTC Hangu forwarded case of the three Officers namely SI Habibullah No. 368/M, SI Ghulam Sadiq No. 269/M and SI Faqir Hussain No. 381/P, being competent, experienced who trained 650 trainees in the short period of 45 days already on list E, recommended that they should be brought on list F as a special case.

Case was examined by the DSC and marked to sub-committee consisting of the following officers to submit the recommendation to next DSC meeting.

1. Mr. Faqir Hussain, DIG/Enquiry & Inspection NWFP Peshawar.
2. Mr. Abdul Wadood Shah, Commandant PTC Hangu.
3. Mr. Khalid Masood, DIG/Operations NWFP Peshawar.
4. Mr. Attaullah Wazir Commandant FRP NWFP.

ATTESTED

ADVOCATE

Representation of Inspector now DSP Muhammad Ashfaq of Mardan Region for revised seniority

Recommendation of PTC Hangu for inclusion of names of SIs to promotion list F

Seniority case of Lady
SIs of CCP/Peshawar

The CCPO Vide Memo No. 4672/E-I dated 13.05.2008 forwarded applications of Lady SI Anela Naz No.47/P, SI Asmat Ara No.44/P and SI Shazia Shahid No.43/P of his establishment who had requested for confirmation on assignment of revised seniority into promotion-list "E".

As per CCPO, Peshawar 6 Lady ASIs were enlisted/appointed as direct ASI vide CCPO Peshawar order No. 5798-808/E-II-5811-15/E-II dated: 24.03.1996 in their seniority was fixed according to their date of birth as under:-

Sr No	Name & No	Date of birth	Date of enlistment / arrival	Date of confirmation on O/Lsi-I	Educational	Date of promotion as Sub Inspector	Courses passed
1.	Rozia Iqbal No. P/39	30.07.1969	27.03.1996	18.04.2002	BA	13.05.2005	Prob course Upper Course
2.	Hamida Bano	04.12.1970	28.03.1996	18.04.2002	BA	13.05.2005	Prob course Upper Course
3.	Anela Naz No. P/47	09.10.1971	03.04.1996	18.04.2002	MA	01.01.2004	Prob course Upper Course
4.	Sura Saleh No. P/36	06.04.1975	27.03.1996	18.04.2002	FA	01.01.2004	Upper Course
5.	Asmat Ara No. P/42	15.04.1975	27.03.1996	18.04.2002	MA	01.01.2004	Prob course Upper Course
6.	Shazia Shahid No. P/43	30.04.1976	31.03.1996	18.04.2002	FA	01.01.2004	Prob course Upper Course

They were confirmed in the rank of ASI and their names were brought promotion list E vide CCPO Peshawar Notification No. 2809-15/EC-I dated 18.04.2002. Later on the CCPO Peshawar promoted 4 Lady ASI to the rank of Of SIs wherein 2 Lady ASI namely ASIs Anela Naz & Sura Saleh on the basis Upper College Course and the other 2 Lady ASI Asmat Ara and Shazia Shahid on the basis of probation Class course vide order No. 1-8/CRC dated 01.01.2004.

After qualifying the probation Class Course the same 2 Lady ASIs, on "E" were also promoted as Offg. SIs by the CCPO, Peshawar vide order No. 36 63/EC-I dated 13.05.2005.

The DPC examined their case in the light of rules, which revealed that 12.2 (3) envisage the principles regarding Seniority and probation whereas P.R. 1 also provides that probationer ASIs who are directly appointed would be considered for probation for 3 years and are liable to be discharged at any time within the period of their probation if they failed to pass the prescribed examination. In light of rule if the case of all the SIs is considered, it would reveal that none of the Lady has qualified the prescribed examination within the period of 3 years. Relevant rules have not been followed while making confirmation of lady police officers. The Commission observe that confirmation of these officer is not in accordance with Police Rule 13.8 which needs to be revised and made strictly as per provision of Police Rules. A revised confirmation in accordance with Police Rules 13.8, their seniority will be settled as seniority is to be reckoned from the date of confirmation. The CCPO therefore may proceed according to Law/Rule.

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discussed above. Confirmation is to be made on the basis of completion of probationary course i.e. from the dates when they qualified it.

The CCPO, Peshawar vide Notification No. 8977-84/EC-I dated 21.10.2009 issued revised seniority list of Lady SIs on the basis of Police Rules 13. The CCPO/Peshawar has forwarded application of lady SIs Rozin Altaf No. P/E and Hameeda Bano No. P/ 99 against the above decision and also intimated that the revised seniority notification has not been correctly and properly processed under the rules as checked by CCPO.

It is submitted that this office is in the process of establishing/constituting committee to process the seniority case of Lady SIs of CCP Peshawar under the rules, as these seem to have been haphazardly drawn up.

The case was marked to DSC.

The DSC thoroughly examined their case and decided to send the case CCP/Peshawar to submit detail report within one month to next DSC for further action.

Representation of Inspectors for restoration of seniority

As per DSC Decision dated 09.02.2009 the date of confirmation of 24 Senior Inspectors of CCP Peshawar was revised as 06.10.1997 instead of various dates. They were assigned ante-dating seniority into promotion list "F" according to the date of confirmation and names placed above the name of Inspector Ehsanullah No. K/14 at S/No. 57 and below the name of Inspector Khurshid Ahmed No. P/ 2 S/No. 55 of the seniority list issued vide this office Notification No. 4626-56/E dated 19.02.2009.

Aggrieved to this the following Inspectors on list "F" have submitted representations and requested to set aside the impugned Notification No. 7103/E dated 12/3/2009 and the due seniority of the applicants may be restored.

S/No	Name and number	Home District	Edu	Date of Birth	Date of Joining Service	Date of confirmation in the rank of SI	Date of admission to promotion list "F"	Date of continuous service as SI/Inspector	Date of confirmation as Inspector
1	Ehsanullah No. K/14	Bannu	F.A	10.01.62	05.06.83	05.11.97	16.03.2002	18.11.2002	16.03.02
2	Mir Chaman No. K/12	Karak	BA	22.04.53	25.04.77	05.02.98	16.03.2002	18.11.2002	16.03.02
3	Pir Shahab Ali Shah No. MR/1	Mardan	MA/LLB	12.08.60	10.04.80	20.01.98	16.03.2002	16.01.2003	16.03.02
4	Zain Khan No. P/52	Mardan	MA/LLB	01.04.60	06.02.90	15.12.98	16.12.2002	16.12.2005	16.03.02

The representations of the above Inspectors were put before the high ups which were marked to the DSC.

DSC thoroughly examined their representation and marked the case to committee consisting of the following officers to check as to whether their probationary period was completed on 06.10.1997.

1. Miss Khurshid Anwar, AIG/Legal CPO

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ADVOICATE

Case of Inayatullah of
Surplus Pool for
adjustment as MVE in
Police Department

The DSC examined the case and referred it to the committee already formed for the purpose:

Four (4) Vacancies of MVEs are lying vacant in NWFP Police.

In order to fill up these vacancies by the candidates of Automobiles & Diesel Engine Diploma holders, the Establishment Department Govt. of NWFP Peshawar addressed the PPO for views regarding the adjustment of Mr. Inayatullah Unit Supervisor (BS-11) District Tank now in Surplus Pool office of the Assistant Agriculture Engineer Dikhan.

The case was put up to high-ups on which the Addl. IGP/HQrs ordered place it before DSC.

The case was discussed in the DSC meeting held on 14.05.2008 and it was decided to seek comments of AIG/Traffic in this regard.

The AIG/Traffic vide memo No. 2181/EC dated: 29.07.2008 submitted that applicant Mr. Inayatullah passed his diploma in Auto & Diesel Technology from Govt. College of Technology, Kohat Road, Peshawar. He is fulfilling the required qualification/standard for the post of MVE. However, proper procedure of appointment is necessary to be adopted.

The posts of MVE were previously advertised in the news papers by the CPO to invite application of the candidates, fulfilling the required standard followed by test and interview. The case was discussed in the DSC meeting held on 14.10.2008 and it was decided to refer the case to Govt. to provide list of all officers having the required qualification for adjustment as MVE in Police Department. The Govt. of NWFP Establishment Department intimated that Mr. Inayat Ullah, of Surplus unit Supervisor (BPS-11) having diploma of Associate Engineering in Auto & Diesel, fulfils the prescribed qualification for the post of Motor Vehicle Examiner. He may be adjusted against the said vacant post. There is no provision in the surplus Policy to place the Surplus Employees before the DPC/DSC, if he fulfills the qualification prescribed for the post and also endorsed to District Coordination Officer Tank with the request to place the services of Mr. Inayat Ullah Surplus Unit Supervisor (BPS-11) District Tank at the disposal of DIG/(HQ) Central Police Office, NWFP Peshawar for further adjustment against the vacant post of Motor Vehicle Examiner (BPS-11).

In light of the above instructions of the Govt. of NWFP Establishment Department the DCO concerned has relieved Mr. Inayat Ullah Surplus Unit Supervisor (BPS-11) District Tank and he placed his services at the disposal of DIG/HQrs CPO, NWFP Peshawar for further adjustment against the vacant post of Motor Vehicle Examiner.

The DSC examined the case in its meeting held on 09.02.2009 and noticed that complete record of the case has not been provided to the DSC for perusal as list of officers provided by the Establishment Department is not available. It was decided to adjourn the case for want of complete record of the case and list of all other officers having the required qualification.

Govt. of NWFP Establishment Department provided a list of other officers having the required qualification.

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Representation of Inspector Akhtar Ali of Investigation Nowshera for seniority.

The case was referred to DSC.

The DSC examined the case of Inayatullah of Surplus pool and recommends to adjust him against the post of NIV in Police Department.

Capital City Police Officer, Peshawar has forwarded representation submitted by Acting DSP Investigation Nowshera Akhtar Ali Khan No. P/185 requesting therein that his case may kindly be considered for revised confirmation as SI w.e. from 06.10.1997 instead of 31.03.2000 like others regarding confirmation of 26 SIs of Capital City Police Peshawar.

The same was forwarded to the CCPO/Peshawar for parawise comments.

The CCPO/Peshawar submitted the following parawise comments:-

26 SIs are senior from the above Inspector and they were confirmed in the rank of SIs with effect from 06.10.1997 by the then DIG/Peshawar Range Peshawar vide notification No. 725-38/EC dated 29.01.2001.

The order of the 26 SIs was then revised in the light of PPO NWFP Peshawar's memo No. 17914/E-II dated 25.10.2001 wherein it was directed that confirmation of the above SIs may be made on case to case basis against the vacancies occurred from various dates. In the DIG/PR order No. 95203/EC dated 27.10.2001 the last one out of 26 SIs, was SI Subul Khan No. P/185 who was confirmed with effect from 28.02.2000. After that on the direction of PPO vide his letter No. 15797/E-II dated 20.09.2000, the representationist Inspector Akhtar Ali No. P/85 now DSP/Investigation Nowshera was also confirmed in the rank of SI w.e. from 31.03.2000 as a Special case due to his extra ordinary performance in case FIR No. 337 dated 23.11.2000 by the DIG/PR vide his letter No. 9477/EC dated 25.10.2000.

Against the revised confirmation order the following Inspectors represented.

- i. Inspector Rahim Shah.
- ii. Inspector Tariq Sohail.
- iii. Inspector Khan Akbar.

The representations of the above Inspectors were thoroughly examined by the DPC in its meeting held on 09.02.2009 and recommended to restore the previous notification earlier issued by the DIG/PR and further stated that seniority of the officers may be fixed on the basis of their confirmation i.e 06.10.1997;

In the light of above recommendations of DPC, the previous notification of their confirmation was restored vide this office notification No. 3004/EC-I dated 04.03.2008 while the revised notification of their confirmation was withdrawn.

On the analogy of above confirmation of SIs now Inspector Akhtar Ali Khan has also requested that he may be confirmed as SI with effect from 06.10.1997 instead of 31.03.2000.

In this regard it is also pertinent to mention here that Mr. Akhtar Ali Khan was confirmed as SI for his extra ordinary performance in case FIR No. 337 dated 23.11.2000.

The case was put before the high up which was marked to the DSC.

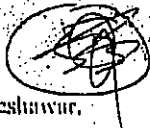
DSC examined the case and rejected his representation having no merits.

The CCPO-Peshawar has forwarded the representation of Inspector Saleem Amanullah of CCPO Peshawar requesting therein that his name in the seniority list of Inspector and Sub-Inspector of list "F" as stand on 31.12.2008 may kindly be

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Representation of Inspector Amanullah of CCPO/Peshawar for

Saleem Amanullah of CCPO/Peshawar for

- (10) 
2. Malik ur Rehman, DSP/Legal Investigation NWFP Peshawar.
 3. Supdt: Establishment CPO Peshawar.
 4. Establishment Clerk-II CPO
 5. Mr Hassan Establishment Clerk CCP/Peshawar.

Fixation of 02 years
tenure for posting of
Head of Investigation

Vide Memo No. 1044/Inv. dated: 18.02.2009 Addl: IIP/Investigation has submitted a copy of letter No. 217/Inv. dated: 21.01.2009 of SSP/Abbottabad wherein he suggested at least 2 years tenure for posting of Head of Investigation and to a mechanism in Police order 2002 for premature transfer of Head of Investigation.

An office note was put up to the highups which was marked to DSC.

The DSC examined the case and recommended to fix tenure of Head of Investigation as per tenure of DPO.

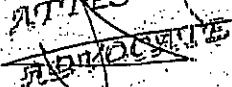
Promotion case of FRP
Personnel

The Govt. of NWFP, had established a force namely Frontier Armed Reserve during the year 1986. On 16.01.1988, Additional Police, Temporary Staff, PAF Contingents, Striking force and Mounted Police were absorbed in Frontier Armed Reserve vide Govt. of NWFP, Home and TAs (Department Notification No. SO(Police-I)-HD/R-10/146-149 dated 16.01.1988 and decided that the duties and responsibilities of new set-up will be the same as those of REGULAR POLICE elsewhere and its services are governed by the Police rules 1931 or any other Rules applicable to their counterpart in the Regular Police. Therefore promotion from one rank to another and from one grade to another shall be in accordance with Chapter 13 of Police Rules.

Later on in 1991, the name of the force FAR was converted into Frontier Reserve Police. In the year 1994 a Standing Order No. 3 was framed by the Police Chief for the promotion of illiterate constable of FRP to HC, ASI/PC and SI/PC. The same Standing Order was revised during the year 1999, that list A, B, C, D and E shall be kept in the office of Commandant, FRP NWFP, for the purpose of the promotion of literate subordinates.

Due to some misunderstanding authority issued promotion orders of literate subordinates as ASI/PC and SI/PC on temporary basis. Many of them were given promotion from the rank of Head Constable (BPS-7) to SI/PC (BPS-14) for the period of two years, which is against the Police Rules, Standing Order No-3/1994, 3/1999, 1/2006 and instructions issued by the Govt. of NWFP, Home Department.

Frontier Reserve Police was temporary force up to 30.06.2003 therefore no confirmation against any rank was made previously. On 01.07.2003 the temporary posts of FRP were converted into permanent status by the Provincial Govt. Therefore promotion orders of literate officials were required to be regularized as per Police Rules from their due dates.

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The case was put up to the DPC. The DPC thoroughly discussed the issue and opined that as the police rules chapter-13 is in detail and very clear that no constable / head constable be admitted to 1st D who is not thoroughly efficient in all branches of the duties of the constable and head constable of established integrity. The FRP is also transit force and the officials are being transferred after 5 years service in their domicile District. Therefore, the quota of the lower college course, intermediate college course and upper college course may be withdrawn. However, since there are some districts i.e. Charsadda, Mardan and Bannu etc. where the number of constables out number the other districts and in those cases the Commndt FRP will issue guide line and circulate to the DPC for approval.

Number of officials/officers of FRP challenged this decision of the DPC. Now the Commandant FRP reported that Constables were enlisted in FRP upto the year 2003, who were given promotion after fulfilling the required condition of promotion as per Police Rules, as they were serving in FRP with their lien and in order to implement decision of the DPC dated: 14.12.2006, they will be deprived from their legal rights, leading to the litigation. The Commandant FRP requested for reconsideration of the case by the DPC.

An office note was submitted to the high ups for orders, which was marked to DPC to examine the case and make recommendation (s).

The DPC examined the case very thoroughly and recommended that the previous decision of DPC shall stand however, a committee may be constituted of the following officers to examine the case in the light of representation received and recommendation made by Commandant FRP and submit detailed report with specific recommendations for consideration in the next meeting of the DPC.

- | | |
|---|----------|
| 1. Mr. Faqir Hussain, DIG/Enquiries & Inspections CPO | Chairman |
| 2. Mr. Fasih ud Din, Deputy Commandant FRP NWFP | Member |
| 3. Mr. Linaqat Ali Khan, AIG/Legal CPO | Member |
| 4. Mr. Abdul Malik Khan, Registrar CPO | Member |

The above mentioned committee's meeting was held on 18.08.2007 at CPO Peshawar and its recommendations are reproduced below:-

"At the outset, Linaqat Ali Khan, AIG/Legal informed the participants that the issue of promotion of FRP personnel has already been considered in DPC meeting held on 14.12.2006. A final decision of the DPC meeting, all the merit subordinates of FRP will be transferred to their domicile districts. He further added that in the FRP, does not fulfil the requirement of promotion as per police rules. In quota for various courses allowed in FRP was withdrawn on the recommendation of DPC.

Abdul Malik Khan, Registrar, CPO endorsed the views of AIG/Legal and stated that all the merit officials of FRP may be transferred to their respective districts as per decision taken in the DPC. He further added that FRP is a transit force, therefore, their promotion cannot be regularized as per police rules.

Faqir Hussain, Commandant FRP, Chairman of the committee told the meeting that FRP has been given permanent status in 2003. However, the Chair

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agreed with the views of both the members. But he further added that on transfer to respective districts, no one is deprived from his due right/seniority.

After detailed discussions, the committee reached at the conclusion that all literate Head Constables and ASIs of FRP may be transferred to their domicile districts, to settle the issue once for all. The Commandant, FRP office will provide the names to CPO for further necessary action. However their names will be placed in List D on the merit of the year in which he passed the Intermediate Class Course.

All the literate HCs, ASIs were duly transferred to their respective domicile Districts.

Aggrieved to this Ali Hassan etc filed a writ petition before the Honourable High Court Peshawar. The Honourable Peshawar High Court Peshawar while disposing of the writ petition passed the following order on 20.03.2008 (copy attached).

"We feel that apparently the FRP is now a regular establishment and no more a transit force and there is no proof that the personnel working therein were temporarily posted for five years, therefore, the discriminatory treatment meted out to them, is violative of the fundamental rights, particularly when they will be placed at an extra-ordinary junior position if transferred to the Districts and enlisted there on the basis of their length of service and experience in all branches of police force. In any case, since the petitioners have not been transferred out of the Frontier Reserve Police within the prescribed period of five years, as stated in the impugned order, therefore, a mistake on the part of the concerned authorities cannot put the petitioners in an adverse situation and they cannot be penalized for the fault of the others. Moreover the decision to rectify a wrong practice shall definitely operate prospectively and it cannot be applied to the petitioners retrospectively who had been recruited in FRP and had been continuously serving the department for over fifteen years.

We, therefore, direct that the case of the regularization, promotions and opportunities, for enlistment in the intermediate course etc, shall be re-examined at a higher level under the supervision of the Provincial Police Officer and the decision dated 16.02.2007 may be re-considered by the concerned JPC so that nobody should be discriminatively deprived of his legal rights and that no decision be made operative retrospectively damaging the members of the discipline force who have to perform extra-ordinary duties and who deserve to be adequately compensated and encouraged. The re-consideration process be finalized within a period of two months and the result thereof be communicated to the petitioners and a report may be forwarded to the Registrar of this Court. With these observations these petitioners are disposed of."

The case was referred to DSC. The DSC in its meeting held on 14.05.2008 decided to constitute a committee comprising DIG/Investigation, AIG/Legal CPO, and Registrar CPO, Peshawar to examine this case and submit detail report to next DSC meeting.

The committee has examined the case and submitted a detail report with the following recommendation:-

The committee after due deliberation and in order to give effect to the orders

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if the High Court recommends that earlier decision on the DPC should not be applied retrospectively and all officials of the FRP be given permanent status and may be confirmed in their rank with their colleagues after completing their probation period as per PR-13-18.

Benefit received by the officials in the FRP till decision of DPC and their reprimention to the Districts of their domicile be kept in tact so that they should not be deprived of any right as per decision of the Court.

All these officials may be dealt strictly according to standing order No. 3/99. Literate officials may be treated as per Police Rules whereas cases of illiterate officials may be treated as per criteria in the Standing Order. Seniority of illiterate officials be fixed in each list on the basis of course undergone and criteria fixed under Police Rules Chapter 13.

The case was referred to DSC

DSC thoroughly examined the case and agreed with the above recommendation of the sub committee. B

Allocation of marks /
number for Anti
Terrorist & Sabotage
training held at BDS
Lahore.

Vide Memo No. 2054/SRC dated 30.03.2009 DPO Kohat has intimated that many Constables of his District have passed Anti Terrorism and Sabotage Training held at Bomb Disposal Unit Lahore, but this Course has not been mentioned in Standing Order No. 10/1987 now read with Standing Order No. 1/2004. He requested that his office may be apprised about the numbers of above course which will be given to those constable who have passed B-I examination during the year 2009. Duration of this training is about 15 days.

An office note was put up and the Addl. IGP/HQrs NWFP Peshawar referred the case to DSC.

The DSC examined the case and referred it to the committee consisting of the following officers to check the standing order No. 01/2004 and submit suggestions regarding all the courses.

1. Mr. Abdul Majeed Khan Marwat, Addl. IGP/HQrs NWFP Peshawar.
2. Mian Khurshid Anwar, AIG/Legal CPO Peshawar.
3. Mr. Abdul Malik Khan, Registrar CPO

Grant of Marks for
general protection
course

Deputy Inspector General of Police Bannu vide his Memo No. 1297/EC dated 11.04.2009 at Annexure "A" has intimated that Constable Saadullah No. 115 of Operation staff, Bannu, preferred an application through DPO/Bannu vide his Memo No. 3467 dated 07.04.2009, requesting therein for the grant of 02 marks for General Protection Course as the same marks have not been given in the merit list of B-I. selection, made by DPO/Bannu.

According to the amendment in the Standing Order No. 1/2004, issued by CPO, Peshawar, 2 marks have been allowed to those Candidates who have undergone/proceeded to Improvised Explosive Device Course instead of General Protection course.

An office note was put up and the Addl. IGP/HQrs NWFP Peshawar referred the case to DSC.

ATTACHED
20.04.2009

seniority.

Inspector and Sub-Inspector of list "P" is stood on 31.12.2008 may kindly be corrected and his name be placed at S/No. 214 of list as he was confirmed-as sub-Inspector on 06.09.2006. on which the comments of CCPO/Peshawar were asked.

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The CCPO Peshawar has submitted the following comments:-

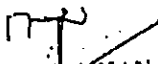
1. Para No. 1 Correct as per record.
2. Para No. 2 correct, the application had filed representation for confirmation with his colleagues.
3. Para No. 3. Correct, the representation of applicant was accepted and his seniority was revised. He was confirmed w.e form 06.09.2006.
4. Para No. 4 the Seniority list was issued by PPO NWFP Peshawar where in his name placed at S/No. 315.
5. Para No. 5 Correct as per record.


Prayer.


Keeping in view the above, representation of Saleem Amun Inspector may kindly be considered in the light of his revised seniority from date of confirmation.


The case was put before the high ups which was marked to the DSC. DSC thoroughly examined the case and recommended that he be assigned revised seniority with his colleagues according to date of confirmation as Sub Inspector.

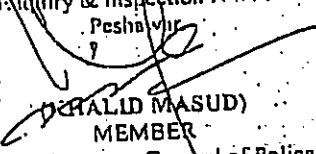

 (ABDUL LATIF KHAN)
 CHAIRMAN
 Addl. Inspector General of Police,
 Operations, NWFP, Peshawar.

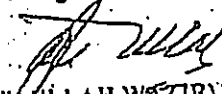

 (ABDUL MAJEED KHAN MARWAT)
 MEMBER
 Addl. Inspector General of Police,
 Headquarters NWFP Peshawar


 (FAQIR HUSSAIN)
 MEMBER
 Deputy Inspector General of Police,
 Inquiry & Inspection NWFP
 Peshawar



 (ABDUL WADOOD SHAH)
 MEMBER
 Commandant Police Training
 College, Hangu


 (SAIFULLAH KHAN)
 MEMBER
 Capital City Police Officer
 Peshawar.


 (KHALID MASUD)
 MEMBER
 Deputy Inspector General of Police,
 Operations NWFP Peshawar


 (ATIQULLAH WAZIR)
 MEMBER
 Commandant FRP NWFP
 Peshawar.

Approved


 (MALIK NAVEED IQBAL)
 PROVINCIAL POLICE OFFICER, NWFP,
 PESHAWAR.

ATTESTED
ADVOCATE



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

No. 991 / Legal

dated the 11 / 03 / 2023.

To: All Regional Police Officers/ CCPO, Peshawar,
Khyber Pakhtunkhwa.

All Head of Units/ DICI Operations
Khyber Pakhtunkhwa.

Subject: PERSONAL HEARING OF POLICE OFFICIALS/ OFFICERS FALLING UNDER THE
ARBIT OF OUT OF TURN PROMOTIONS

Memo:

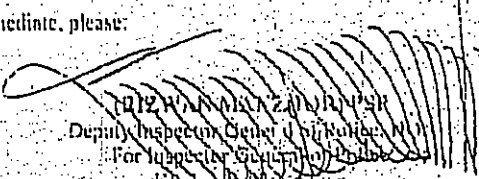
Giving personal hearing to address the grievances of Police officials/ officers is part and parcel of Police Department for their redressal, in most impartial and transparent manner.

2. Keeping in view the above, it is being requested to give personal hearing to all those Police officials/ officers who availed out of turn promotions in their respective regions positively for tomorrow i.e. on 12th March, 2023. In this regard Police officials/ officers who availed out of turn promotion and are borne at lists A, B & C will be heard by respective District Police Officers whereas officers enlisted by list 'D' & 'E' will be heard by concerned Regional Police Officers. Rest of officers on list 'F' and above will be heard at CPO who shall be informed by the concerned RPOs/ DPOs officers. Therefore, necessary arrangements may be made for tomorrow on 12th March, 2023 regarding compliance on urgent basis.

3. Furthermore, all officers borne on 'F' list and other officers from the rank of Inspector and above will be heard by Deputy Inspector General of Police, Operations, Khyber Pakhtunkhwa who will be assisted by DSP/ Legal, CPO, Peshawar.

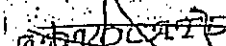
4. All officers being heard shall be bound to sign the attendance sheets and proceedings of such hearings should be shared with office of AIG/ Legal, CPO Peshawar by 13th March, 2023.

The matter should be treated as Most Immediate, please:


RIZWAN AKBAR, DSP
Deputy Inspector General of Police, Operations
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

- CC
- Additional Inspector General of Police, HQs, Khyber Pakhtunkhwa, Peshawar.
 - PSO to W/ Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
 - DSP/ Operations, CPO, Peshawar with direction to circulate to all concerned.
 - DSP/ Legal, CPO, Peshawar.

ATTACHED



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

No.891/Legal

dated the 11/03/2023

To:

- All Regional Police Officers/CCPO, Peshawar
Khyber Pakhtunkhwa
All Head of Units/DIG Operations
Khyber Pakhtunkhwa

Subject:- PERSONAL HEARING OF POLICE OFFICIALS/OFFICERS
FALLING UNDER THE AMBIT OF OUT OF TURN
PROMOTIONS.

Memo:

Giving personal hearing to address the grievances of Police Officials/Officers is part and parcel of Police Department for their redressal, in most impartial and transparent manner.

2. Keeping in view the above, it is being requested to give personal hearing to all those Police Officials/Officers who availed out of turn promotions in their respective regions positively for tomorrow i.e on 12th March, 2023. In this regard Police Officials/Officers who availed out of turn promotions and are borne at lists A, B & C will be heard by respective District Police Officers whereas officers enlisted to lists 'D' & 'E' will be heard by concerned Regional Police Officers. Rest of officers on list 'F' and above will be heard at CPO who shall be informed by the concerned RPOs/DPOs offices. Therefore, necessary arrangements may be made for tomorrow on 12th March 2023 regarding compliance on urgent basis.

3. Furthermore, all officers borne on 'F' list and other officers from the rank of Inspector and above will be heard by Deputy Inspector General of Police, Operations, Khyber Pakhtunkhwa who will be assisted by DSP/Legal, CPO, Peshawar.

4. All Officers being heard shall be bound to sign the attendance sheets and proceedings of such hearing should be shared with office of AIG/Legal CO Peshawar by 13th March, 2023

The mater should be treated as Most Immediate, Please.

(RIZWAN MANZOOR) PSP
Deputy Inspector General of Police, HQrs
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

CC

- Additional Inspector General of Police, HQrs, Khyber Pakhtunkhwa, Peshawar
- PSO to W/Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- DSP/Operations, CPO, Peshawar with direction to circulate to all concerned.
- DSP/Legal, CPO, Peshawar.

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ADVOCATE

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

No.993/Legal

dated the 10/03/2023

To,

1. All Units Head of Police in Khyber Pakhtunkhwa.
2. All Regional Police Officers in Khyber Pakhtunkhwa.
3. The CCPO Peshawar.
4. All District Police Officers in Khyber Pakhtunkhwa

Subject:- ORDERS REGARDING WITHDRAWAL OF OUT OF TURN PROMOTIONS.

In compliance with Order Sheet of Hon'ble Supreme Court of Pakistan dated:26.01.2023 in Suo Moto Contempt proceedings vide Cr.I.O Petition No.38/2021, letter from CPO Peshawar under Subject, Collection of date of police officers falling under the definition of out of Turn Promotion bearing No.CPO/CPB/75 dated:14.02.2023 was issued to all Units Heads, RPOs and CCPO Peshawar to report of Turn Promotions cases from their respective Regions and Units.

2. Besides, Keeping in view the above, CPO issued a letter bearing No.991/Legal dated:11.03.2023 and Subject, Personal Hearing of Police Officials/Officers falling within the ambit of Out of Turn Promotion in which it was requested to give personal hearing to all those Police Officials/Officers who availed out of Turn Promotions in their respective Regions positively on 12th March, 2023. In this regard, Police Officials/Officers who availed Out of Turn Promotions and are borne at lists A,B & C were heard by respective District Police Officers whereas officers enlisted to lists 'D' & 'E' were heard by concerned Regional Police Officers and Unit Heads. Rest of officers on list 'F' and above were heard at CPO, Peshawar

3. Orders concerning withdrawal of Out of Turn Promotions/Cases, against officials who are borne on Lists A,B and C are to be issued by respective District Police Officers or concerned Superintendents of Police of Units. Besides, Police Officers who got Out of Turn Promotions and are borne on lists D & E, their withdrawal Orders are to be issued by respective Regional Police Officers and Unit Heads. Moreover, Orders relating withdrawal of Out of Turn Promotions against Police Officials/Officers who are borne in list F or above will be issued by CPO, Peshawar.

4. Likewise, Absorption Orders issued by CPO, Peshawar for officials who got absorbed in Telecommunications and Transport HQ from other District/Units will also be issued by CPO, Peshawar.

5. All Regional Police Officers, Units Head and District Police Officers are being requested issue such Orders by 13.03.2023 so that the compliance report with Order Sheet of Hon'ble Supreme Court of Pakistan dated:26.01.2023 in Suo Moto Contempt proceedings vide

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12/03/2023, 2:24

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The matter may be treated as immediate basis that copy of the copy

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(RIZWAN KHANZAB) SA
Deputy Inspector General of Police
for Inspecting General of Police
Khyber Pakhtunkhwa,
Peshawar

- 1- Additional Inspector General of Police-HQs, Khyber Pakhtunkhwa, Peshawar
- 1- Additional Inspector General of Police, Operations, Khyber Pakhtunkhwa, Peshawar
- 1- Additional CPD, Peshawar
- 1- PSU to Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
- 1- Registrar CPD Peshawar

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(Signature)
ADVOCATE

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Cri.O Petition No.38/2021 could be submitted to the Hon'ble Supreme Court of Pakistan on ___03.2023.

6. The matter may be treated on immediate basis and copy of the orders so issued must be shared with CPO Peshawar by tomorrow 13.03.2023.

(RIZWAN MANZOOR) PSP
Deputy Inspector General of Police, HQrs
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

CC

1. Additional Inspector General of Police, HQrs, Khyber Pakhtunkhwa, Peshawar
2. Additional Inspector General of Police, Operations, Khyber Pakhtunkhwa, Peshawar
3. AIG Legal CPO, Peshawar
4. PSO to Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
5. Registrar CPO Peshawar

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

ANN-
"Z"

No.

597 Legal/E-1

dated the

16/03/2023.

ORDER

In compliance with Order Sheet of Hon'ble Supreme Court of Pakistan dated 26.01.2023 in *Suo Moto Contempt proceedings* vide Crl.O. Petition No. 38/2021 and in pursuance of Judgments passed by Hon'ble Supreme Court of Pakistan in 2013 SCMR 1752, Civil Review Petition No. 193/2003 reported in 2015 SCMR 456, 2016 SCMR 1254, 2017 SCMR 206, 2018 SCMR 1218 and consolidated Judgment dated 30.06.2020 in Civil Petitions No. 1996, 2026, 2431, 2437 to 2450, 2501 and 2502 of 2019 on issues of Out of Turn Promotions, all Unit Heads, Regional Police Officers and District Police Officers of Khyber Pakhtunkhwa Police were directed vide this office Letter No. CPO/CPB/75, dated 14.02.2023, to ensure compliance of above mentioned Orders in letter and spirit. Accordingly, all Out of Turn Promotions granted to Police personnel either on gallantry or otherwise belonging to different Units, Regions & Districts have been withdrawn by the concerned authorities and consequently their seniority has been re-fixed along with their batchmates who were promoted during their intervening period by maintaining original inter-se-seniority.

2. In view of the above, case regarding Out of Turn Promotion of Mr. Tayyab Jan DSP was examined. As per details provided by office of CCP Peshawar vide Letter bearing No.4649/EC-I dated 12.03.2023 on subject "collection of data of police officers falling under the definition of out of turn promotion". He was enlisted as Constable in FRP on 01.07.1989. He was transferred to CCP Peshawar along with his lien on 06.03.1991. On 31.08.1992 he was transferred back to FRP on deputation basis. He was promoted as Officiating HC in 1992 vide Order No. 8469-72/FRP/EC. He qualified his A-1 examination on 26.06.1994 and B-1 examination on 08.04.1997. He passed his Lower College Course on 20.04.1998. After Lower College Course, he was again transferred to FRP along with his lien. From FRP he was selected for Intermediate College Course and completed the same on 10.04.1999. He was promoted as Officiating ASI on 26.07.2000. He was promoted as Sub Inspector/PC on 22.07.2003 but later-on, 04.07.2006 he was promoted to Officiating Sub Inspector w.e.f 22.07.2003 in FRP. In 2007, he was transferred back to CCP Peshawar along with his lien again and promoted as Officiating Sub Inspector on 21.04.2008 from CCP Peshawar. He completed his Upper College Course in the term ending on 20.09.2009. He was confirmed as SI and admitted to list 'F' on 14.03.2012. He was promoted as Officiating Inspector on 30.01.2013. His career progression is full of gross and flagrant violations of Police Rules. He was promoted and confirmed without following the prescribed path for undergoing the requisite mandatory courses under Police Rules 1934. At present he stands at S. No. 163 in the DSsP Seniority list issued vide No. 1594/SE-I dated 05-08-2022. After withdrawal of his Out of Turn Promotions his name is placed above the name of his colleague confirmed SI Syed Abid Shah No. P/544 of CCP Peshawar.

3. In this regard, Para 122 of Judgment of Hon'ble Supreme Court of Pakistan 2015 SCMR 456 is reproduced as under;

122. The issue of out of turn promotions has been dealt with by us in detail in the judgment sought to be reviewed and we reached the conclusion that it was violative of Articles 240, 242, 4, 8, 9 and 25 of the Constitution. Mr. Adnan Iqbal Chaudhry, learned Advocate Supreme Court has contended that section 9-A of the Act has not been struck down by this Court, while declaring the out of turn promotions as unconstitutional. We are mindful of this fact as we have held that the Competent Authority can grant awards or rewards to the Police Officers, if they show act of gallantry beyond the call of duty. However, we had struck down the very concept of 'out of turn promotion' being violative of Constitution for the reasons incorporated in paras 158 to 164 of the judgment under review.

4. As per Para No. 73 of Judgment of Hon'ble Supreme Court of Pakistan 2018 SCMR 1218 (Intra Court Appeals No.4 of 2017 etc) when any legislative instrument is declared unconstitutional, it is declared void ab initio. The Para No. 73 is being reproduced as under;

73. The contention of Khawaja Haris Ahmad, learned Sr.ASC that in Para No. 123 of Shahid Pervaiz's case (supra) this Court had wrongly observed that "we have already declared void ab initio the legislative instruments that provided for out of turn promotions." because nowhere in the earlier judgment was such a declaration made, is also without force. Suffice it to say that in Para 104 of Shahid Pervaiz' Case (Supra), it was observed that: "104. Through the successions of its orders, this Court has consistently maintained the unconstitutionality, and the consequential nullity of the instruments providing for the out of turn promotion." Moreover, in Para 129 of the judgment of Ali Azhar Khan Baloch's case (supra), this Court was pleased to observe that when

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any legislative instrument is declared unconstitutional, the effect of such declaration is that such legislative instrument becomes void ab initio. The relevant part of Para 129 is being reproduced hereunder: "129. Now, it is a settled law of this Court that no right or obligation can accrue under an unconstitutional law. Once this Court has declared a legislative instrument as being unconstitutional, the effect of such declaration is that such legislative instrument becomes void ab initio, devoid of any force of law, neither can it impose any obligation, nor can it expose anyone to any liability."

5. Similarly, Hon'ble Supreme Court of Pakistan Judgment reported as 2017 SCMR 456 vide Para No. 98 declared Out of Turn Promotions as null and void in the following terms which is reproduced as under;

98. In a series of judgments, this Court has declared out-of-turn promotions as being unconstitutional, un-Islamic, and void ab initio. The principle of unconstitutionality attached to the instrument providing for out of turn promotion was laid down first in the case of Muhammad Nadeem Arif vs. I.G of Police (2011 SCMR 408). The view taken in this judgment was followed in another case reported as Ghulam Shabbir vs. Muhammad Munir Abbasi (PLD 2011 SC 516); wherein it was held that out of turn promotion was not only against the Constitution, but also against the Injunctions of Islam; and that reward or award should be encouraged for meritorious public service but should not be made basis for out of turn promotion.

6. Mr. Tayyab Jan DSP was given chance of personal hearing on 12.03.2023. He was informed about his personal hearing through Wireless Police Control besides other possible means. However, he did not attend hearing despite being informed. Perusal of his record reveals that as mentioned in Para No. 2 of this order, He was enlisted as Constable in FRP on 01.07.1989. He was transferred to CCP Peshawar along with his lien on 06.03.1991. On 31.08.1992 he was transferred back to FRP on deputation basis. He was promoted as Officiating HC in 1992 vide Order No. 8469-72/FRP/EC. He qualified his A-1 examination on 26.06.1994 and B-1 examination on 08.04.1997. He passed his Lower College Course on 20.04.1998. After Lower College Course, he was again transferred to FRP along with his lien. From FRP he was selected for Intermediate College Course and completed the same on 10.04.1999. He was promoted as Officiating ASI on 26.07.2000. He was promoted as Sub Inspector/PC on 22.07.2003 but later-on, 04.07.2006 he was promoted to Officiating Sub Inspector w.e.f 22.07.2003 in FRP. In 2007, he was transferred back to CCP Peshawar along with his lien again and promoted as Officiating Sub Inspector on 21.04.2008 from CCP Peshawar. He completed his Upper College Course in the term ending on 20.09.2009. He was confirmed as SI and admitted to list 'F' on 14.03.2012. He was promoted as Officiating Inspector on 30.01.2013. His career progression is full of gross and flagrant violations of Police Rules. He was promoted and confirmed without following the prescribed path for undergoing the requisite mandatory courses under Police Rules 1934. At present he stands at S. No. 163 in the DSsP Seniority list issued vide No. 1594/SE-I dated: 05-08-2022. After withdrawal of his Out of Turn Promotions his name is placed above the name of his colleague confirmed SI Syed Abid Shah No. P/544 of CCP Peshawar.

7. Consequently, his Out of Turn Promotion/Confirmation Orders as mentioned in Para 6 of this Order are withdrawn through this Order and he is demoted from the rank of DSP to the rank of Confirmed Sub-Inspector with immediate effect. After withdrawal of his Out of Turn Promotion, his name is placed above the name of his colleague Confirmed SI Syed Abid Shah No. P/544 of CCP Peshawar.

Sd-

Alhtar Hayat Khan, PSP
PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA,

C.C

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Home & TAs Department, Government of Khyber Pakhtunkhwa, Peshawar.
4. Additional Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.
5. Additional Inspector General of Police, Operations Khyber Pakhtunkhwa, Peshawar.
6. All Regional Heads, Khyber Pakhtunkhwa, Peshawar.
7. All Heads of Police Units, Khyber Pakhtunkhwa.
8. PSO to W/ Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
9. AIG/ Legal, CPO, Peshawar.
10. Registrar, CPO, Peshawar.

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[Signature]

[Signature]
IRIZWAN MANZGORI, PSP
Deputy Inspector General of Police, HQrs
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

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W.P No.1289-P/2023

Tayyab Jan and others

Vs.

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

Date of hearing: 21.06.2023 and 22.06.2023.
Petitioner(s) by: **Mr. Shumail Ahmad Butt, Advocate.**
Respondent(s) by: **Mr. Amir Javed, Advocate General and Mr.
Hasnain Tariq, AAG along with Mr. Rizwan
Manzoor, DIG(HQrs), Khyber Pakhtunkhwa
Police, CPO. Muhammad Asif, AIG(Legal),
CPO. Muhammad Tariq Usman, Inspector
(Legal), CPO.**

JUDGMENT

IJAZ ANWAR, J. This writ petition has been filed under
Article 199 of the Constitution of Islamic Republic of
Pakistan, 1973, with the following prayer: -

*"It is, therefore, very humbly prayed that on
acceptance of this writ petition, this Hon'ble
Court may very magnanimously hold,
declare and order:-*

- i. *That letter dated 11.03.2023,
12.03.2023 and office orders of
demotion dated 16.03.2023 and any
subsequent proceedings or orders
emanating/arising therefrom are
illegal, unlawful, without lawful
authority and thus of no legal effect*
- ii. *The respondents be permanently
restrained from reversing the
petitioners under the garb of Apex
Court judgment passed in respect of
out of turn promotes, which is not
applicable to the case of petitioners as
there was neither out of turn
promotion cadetship or gallantry
service in FRP and all the petitioners
have gone their promotion after*

completing courses on their turn as per seniority.

Any other relief in favour of the petitioner deemed just and appropriate".

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2. In the instant case petitioners were initially appointed in the FRP as Constables and then gained promotion in the regular police as well as in the FRP after undergoing the requisite police training in the quota reserved for FRP. The question formulated for consideration of this Court primarily relates to the terms and conditions of service, because apparently, this case is distinguishable from other connected cases as in the instant case promotion order of the petitioners are withdrawn for the reason as it is out of turn and violative of the judgment of the Apex Court, however, on going through the same we find that no such issue ever raised in the judgments of the Apex Court referred in respect of out of turn promotions and in these cases neither the application/implementation of the judgment of the Apex Court is required, besides, such matters were also never referred in the judgment of a larger bench of this Court.

3. In the given circumstances, the matter primarily relates to the terms and conditions of the service, as such,

(116)

we transmit the same to the Provincial Service Tribunal,
Peshawar for its decision strictly in accordance with law.
Copy of the memo of this petition be retained for the
purpose of record.

Announced
Dt: 27-8-23.


JUDGE


JUDGE

(Amir Shehzaad) *

(DB) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice S.M. Attique Shah.



GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

☎: (091)9210503

✉ policehdhp@gmail.com

☎ (091) 9210201

No. SO (Police-II)/HD/8-11/Police appeals/ 2022-23
Dated Peshawar the 08.05.2023

To,

The Provincial Police Officer,
Khyber Pakhtunkhwa.

Subject: SERVICE APPEAL

Dear Sir,

I am directed to enclose herewith a copy of service appeal of DSP Shakeel Ahmad (BS-17) for necessary action, please.

Yours Faithfully,

SECTION OFFICER (POLICE-II)

Encl(s): as above;

Endst: No & date of even;

Copy forwarded for information to the:

1. PS to Secretary, Home & Tribal Affairs Department, Khyber Pakhtunkhwa
2. Master file.

SECTION OFFICER (POLICE-II)

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To,

The Chief Secretary,
Khyber Pakhtunkhwa, Peshawar.

Handwritten: 24/03/2013
OS Chief Secretary
24/03/23

Subject: SERVICE APPEAL

Respected Sir,

With profound regards, appellant submits review petition against the decision vide which petitioner to next ranks has wrongly been declared in the category of out of turn promotion without examining and scrutinizing of the service dossier of petitioner.

FACTS:-

1. That petitioner was enlisted in FRP Police as Constable on 27.04.1995. Petitioner qualified A-I exam on 14.01.1999 and B-I examination qualified on 02.04.2001 which are pre-conditions for selection to Lower School Course and promotion to the next rank of Head Constable. Petitioner qualified Lower School Course on 14.12.2001 and was promoted to the rank of Head Constable vide order No.6531-40/OSI dated 16.09.2004 by the Commandant FRP KPK. Later on, according to Para-5 of Standing Order No.01/2006 i.e.

"Criteria for promotion to the rank of ASI

(As the nature of duties of ASIs is that of staff officer, therefore, those C-I Head Constables who have completed their tenure in the rank of HC may be promoted to the rank of ASI for a period of two years. If the Commandant FRP, intends to grant extension beyond two years. The officer be reverted and promoted again for further period of two years so Police rules 13-18 is not violated. However, further extension may not be granted.) Petitioner was promoted to next rank of ASI vide order No.4988/EC dated 27.09.2007.

2. That petitioner was selected for intermediate College Course by Commandant FRP in 2009 and qualified the said course. Later on, petitioner was promoted to next rank of offg: Sub-Inspector vide order No.673-77/EC in 2009 and confirmed as ASI vide Commandant FRP order No.5590-91/EC dated 30.07.2010. And nominated for Upper College Course vide Addl: IGPI/Commandant FRP office order No.6975-86/EC dated 01.10.2011 & qualified the same successfully.

3. That the Competent Authority confirmed the colleagues of petitioner in the rank of Sub-Inspector but denied confirmation of petitioner vide CPO letter No.21538/E-II dated 12.11.2012. Therefore petitioner approached KP Service Tribunal vide service appeal No.1264/2012, which was accepted vide order dated 31.01.2013.

RS. H.S. ...
Spl Secy ...
Addl Secy ...
Deputy Secy ...

That petitioner was confirmed in the rank of SI in compliance with the judgment of the KP Service Tribunal vide Notification No 2291/EC dated 28.03.2013. Later on, CPO has lodged CPLA against the judgment of Service Tribunal vide letter No.482-83/Legal CPO dated 04.03.2013, in this regard a meeting scrutiny committee held on 22.03.2013 under the Chairmanship of the Secretary Law Department with other members namely

1. Mr. Lal Jan Khatak Addl: Advocate General KPK.
2. Mr. Usman Zaman S.O Court Home & TAs Department.
3. Mian Imtiaz Gul DSP Legal CPO Peshawar
4. Mr. Shakeel Asghar Dy: Solicitor Law Department.

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to discuss the said matter and after threadbare discussion it was decided with consensus that it was not a fit case for filing of CPLA in the Supreme Court of Pakistan due to the following reasons:-

1. That there was nothing on record to show that appellant was incapable or intentionally avoiding posting as SHO, rather it was the discretion of department authorities to post him as SHO for which appellant cannot be held responsible. Hence it was decided with consensus that depriving appellant of his due right without any convincing ground was not justifiable in law and such kind of attitude always discourages by the superior courts.

In view of the above, Law Deptt: has declared vide letter No.Lt/LD/9-13(12) Home/2013/4569-1 dated 26.03.2013 that the subject case is not fit for CPLA and the judgment of Service Tribunal

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for n/a pr.
24/03/13

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letter No.724/Legal dated 27.03.2013 has directed Commandant FRP KP for implementation of the said judgment. In compliance petitioner confirmed by the Addl: IGP/Commandant FRP in the rank of SI vide Notification No.2291/EC dated 28.03.2013. Commandant FRP was recommended petitioner for promotion to list "F" vide his office letter No.2315/EC dated 29.03.2013. Petitioner was admitted to list "F" vide DPC held on 06.05.2013 at CPO Peshawar duly approved by IGP KPK. Therefore, petitioner was admitted to list "F" and promoted as Offg: Inspector w.e.f 01.07.2010 vide CPO Notification No.10764/E-II dated 09.05.2013.

5. That petitioner was placed in seniority list at S/No.75 of Inspectors/Sub-Inspector on list "F" as it stood on 09.05.2014 vide CPO letter No.370-90/E-II dated 09.05.2014. While, seniority of petitioner was disturbed for which he submitted applications for correction in the said list on 31.01.2017 & 09.08.2017 but received no response from concern authorities. In this regard, the appellant has lodged an appeal before KP Service Tribunal for justice vide No.626/2018, which was accepted and directed the Police Deptt: regarding fixation of seniority of appellant on 13.02.2019. But Police Deptt: has lodged CPLA in Supreme Court against the judgment of KP Service Tribunal vide letter No.767/Legal CPO dated 18.02.2019. In this connection, after perusal, Supreme Court of Pakistan has dismissed CPLA of Police Deptt: on 09.10.2020.

That DSC held on 01.07.2019 at CPO wherein at Para-9 IGP KP declared that:-

- a. Insp: Shakeel Ahmad is recommended for confirmation in the rank of Inspector w.e.f 01.07.2012.
 - b. His seniority may be fixed alongwith his colleagues. And he will be promoted to the rank of DSP after qualifying Advance Course in accordance with Police Rules 13-16 (A).
 - c. 02-years period spent in FRP in the rank of Inspector shall be considered as mandatory period as specified in the Standing Order No.21/2014 and amended Police Rules 13-16 (A).
 - d. Qualification of Advance Course is left for which his name may be recommended in the immediate course.
6. In compliance, the petitioner was confirmed in the rank of Insp: w.e.f 01.07.2012 and placed in seniority list of Inspectors at serial No.02 below the name of Inspector Said Khan No.K/221 vide Notification No.CPO/E-III/Confirmation/609 dated 27.08.2019. In the light of above DSC, the petitioner was nominated to 10th Advance Course vide DIG/Trg: letter No.5308/Trg: dated 05.07.2019 and qualified the same successfully.
7. That, after qualification of Advance Course, petitioner was promoted as DSP (BS-17) vide Notification No.CPO/E-I/Promotion/1723 dated 30.12.2019 by IGP KP and petitioner was placed in seniority list of DSsP at S/No.120 issued vide No.840/SE-I dated 30.04.2020. Later on, revised seniority list was issued vide No.1355/SE-I dated 28.06.2022 wherein the petitioner was placed as S/No.184 without any reason.
8. The appellant was selected for 7th Junior Command Course vide DIG/Trg: office letter No.8769/Trg: dated 09.11.2021 but dropped from the said course due to official assignments and nominated again for 8th Junior Command Course vide CPO letter No.CPO/E-I/1499 dated 21.07.2022 which is undergoing. However, CPO Peshawar has declared before both nominations that the petitioner is not in the category of out of turn. It is pertinent to mention here that, in response to CPO letter No.CPO/CPB/472 dated 10.12.2021, the Commandant FRP has replied that " *Before the promulgation of Standing Order No.01/2014 FRP has its their own hierarchy in seniority, promotion in the lower ranks and allotted quota seats for selection of various courses like Distt: Police by the Competent Authority. The promotion list A,B,C,D and E were also maintained according to Police Rules in the office of Commandant FRP KP. The eligible and qualified officials promoted step by step on the sanction strength seats. On the other hand, CCPO Peshawar has also declared thrice vide letters No.4521/EC-I dated 26.11.2021, No.7434/EC-I dated 13.04.2022 & 4849/EC-I dated 12.03.2023 that petitioner has never served under CCPO Peshawar. In addition, AIG Legal CPO vide his office letter No.11529/Legal dated 08.12.2021 that since establishment of FAR rename as FRP, it has own hierarchy in seniority, promotion in the junior ranks. Selection for course on the quota of seats of different courses to the said organization allotted by the Competent Authority and seniority of promotions lists ABCD & E were also maintained like district Police till promulgation of Standing Order No.01/2014 FRP. And AIG Establishment has declared on 10.12.2021 that petitioner's case relates in FRP & needs evaluation*

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9. It is further added that vide letter No.20-25/PA dated 22.01.1994 issued by the Commandant FRP in the light of directives of IGP KP vide No.1160/E-II dated 15.01.1994 issued a policy regarding regular promotions, examinations like A-1 & transfer of FRP personnel to regular Police by adopting criteria of educational qualification and seniority in service. Moreover, the petitioner has qualified Lower, Intermediate and upper College course from FRP in light of allocation of seats for the said courses vide letter No.3271-3300 dated 19.06.1998 issued by the Commandant PTC Hangu. Furthermore, the petitioner has qualified all course mandatory for promotion in the light of;

Para-1 Standing Order No.01/2006:-General= According to Notification No.SO (Police-I)/HD/a-10/116-149 dated 16.01.1988 from the Government of NWFP Home & TAs Department, the duties and responsibilities of FRP are the same as those of regular Police elsewhere and its services are governed by Police Rules 1934 or any other rules applicable to their counterparts in the regular Police. Therefore, promotion from one rank to another and one grad to another shall be in accordance with chapter 13 of Police rules 1934. For this purpose lists A,B,C,D & E shall be kept in the office of Commandant FRP NWFP Peshawar. However, where there are no specified rules for promotions in accordance with the above lists the following procedures shall be adopted for the promotions of Section Commander & Platoon Commander.

10. Due to the impugned decision which was made blocked the way of petitioner to next rank of superintendent of Police BPS-18. Hence, this review petition on the following grounds.

GROUND:-


- a) That the impugned decision was taken by IGP in the light of CCPO Office letter No.4649/EC-I is totally against the rules as the petitioner was never remained posted under CCPO in his career. Therefore, the said data provided by CCPO office Peshawar in r/o petitioner is totally baseless.
- b) That as per intimation vide above mentioned letter of CCPO, the petitioner was promoted ASI vide OB No.4988/EC dated 27.09.2007 against the law/rules but the said promotion of petitioner was done in the light of rules as mentioned in Para-1 above and confirmed in the rank of ASI vide Commandant FRP office order No.5590-91/EC dated 30.07.2010.
- c) That promotion and confirmation of petitioner mentioned in the impugned decision is vide OB No.673-77 dated 19.01.2009 which is totally wrong. While, the correct date of confirmation of petitioner is Notification No.2291/EC dated 28.03.2013 w.e.f from 01.07.2010.
- d) That the impugned decision of declaring the promotion of petitioner in out of turn category is against the record, law & rules. The impugned decision has allegedly been based on the ground that petitioner has earned promotion on the strength of FRP without taking into account that according to Police Rules 1-3 and section 6 of Khyber Pakhtunkhwa Police Act, 2017 the entire provincial Police is one district and it has been divided on functional basis in FRP, Elite Force, CTD etc. detail history of FRP showing it a part of Police and its legal promotion is annexed on separate sheets.
- e) That petitioner name was brought on promotion list A-1, B-1, C-1, D, and E by office of the Commandant FRP Khyber Pakhtunkhwa in accordance with law and rules. Petitioner has qualified all kind of examinations and courses prescribed for promotion in Police Rules and other relevant law/rules, therefore the promotion of petitioner has wrongly been declared out of turn promotions.
- f) That the Service Tribunal has stamped the eligibility of petitioner for promotions in the judgment passed in service appeal No.626/2018 dated 13.02.2019 and orders passed in execution petition. CPLA filed against the judgment and was withdrawn by the Department. Therefore, re-opening of the past and closed transaction is against the law.
- g) That the promotion of petitioner was made and promulgated in pursuance of decision of departmental promotion committee comprising competent officers. Petitioner has availed the legal promotions for long period, therefore withdrawal of promotion on the pretext of out of turn promotion is against the Law and Rules.
- h) That the FRP authorities has held the promotion of petitioner as legal and in accordance with law and rules. FRP is the competent forum to evaluate the record properly.
- i) That the impugned decision of reversion in r/o petitioner taken by Police Department without personal hearing of petitioner which is against the law/rules.

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- j) That Commandant FRP vide his office letter No.4000/EC dated 28.04.2022 & No.5570/EC dated 07.07.2022 replied to CPO Peshawar that the petitioner has got promotions from FRP in accordance the law/rules.
- k) Moreover, CCPO Peshawar vide his office letters No.4649/EC-I dated 12.03.2023, No.7434/EC-I dated 13.04.2022 & No.4521/EC-I dated 26.11.2021 has never served in CCP Peshawar and his case not relates to his office.
- l) That CPO vide letter No.CPO/E-I/1300 dated 29.07.2021 the petitioner was recommended for 7th JCC & No.CPO/E-I/1310 dated 22.06.2022 recommended for nomination to 8th JCC by CPO Peshawar and both times declared that the name of petitioner is not in category of out of turn promotion as well as in response to CPO letter No.CPO/E-I/1184 dated 06.07.2021 Directorate of Training has also declared vide letter No.6079/Trg: dated 08.07.2021 that the name of petitioner is not included in out of turn list.
- m) That vide Para-J, K, L (Commandant FRP, CCPO Peshawar, Directorate of Training CPO & IGP KP) have declared time and again that the name of petitioner is not included in out of turn promotion list. In this context, the petitioner was nominated to 8th JCC which is mandatory for promotion to the rank of SP (BS-18) and will be completed in next month.
- n) That promotions of petitioner does not fall within the purview of out of turn promotion. Therefore, the impugned decision is worth withdrawal.

It is therefore, humbly requested that the impugned decision may be withdrawn as all promotions of petitioner were made in accordance with Law and approved by legal forum of DPC.

Your respectfully,


Shakeel Ahmad (DSP BS-17) 24/12
Khyber Pakhtunkhwa Police

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HOME & TRIBAL AFFAIRS DEPARTMENT,
KHYBER PAKHTUNKHWA

Sub: Service Appeal

207

Vide Puc a service appeal of Dst Shakeel Ahmad has been forwarded.

The appellant in his appeal has requested for withdrawal of decision & all the promote of the appellant have been done in accordance with Law and approval by legal forum of D.P.C.

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In view of above may we reject the appeal as the issue is already in Court both the Supreme Court and Peshawar High Court or otherwise, please.

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AS (P&L)

AS discussed with Secy (Home) pl. forward to PPO. 08/5/11

500 (P-1)



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

ANN-7

No. 11523 / Legal

dated the 08 / 12 / 2021.

To: The Regional Police Officer,
Hazara.

Subject: REQUEST FOR JUSTICE.

Memo: Please refer to your office Letter No. 27947/E, dated 29.11.2021, on the subject cited above.

The perusal of record reveals that, since the establishment of FAR remaine FRP, it has its own hierarchy in wake of seniority promotions in the junior rank. selection for course on the quota of seats of different courses to this organization allotted by the competent authority and seniority of promotions lists ABCDE were also maintained separately within the organization like Districts till the promulgation of Standing Order No. 01/2014.

If the applicants qualified promotions courses on their own turn with their colleagues and were promoted from one rank to another on the basis of seniority-cum-fitness in accordance with Police Rules 1934 and subsequently, were placed at the bottom of seniority list of the District of their Domicile according to their rank thus they do not come within the ambit of out of turn promotion.

According to judgment of Apex Court if someone promoted on the basis of any kind of incentive i.e. gallantry, cadetship and special case by-passing his batch-mates/colleagues thus it is declared out of turn promotions.

[Signature]
AIG/LEGAL
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
08/12/2021

ATTACHED

AD/PROVIDE



OFFICE OF THE COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR
Ph: No. 091-9214114 Fax: No. 091-9212602

No. 1695 /EC, dated 20/02/2023

To: The Inspector General of Police
Khyber Pakhtunkhwa Peshawar

Subject: COLLECTION OF DATA OF POLICE OFFICER FALLING UNDER
THE DEFINITION OF OUT OF TURN PROMOTION.

Memo: Kindly refer to CPO Memo No. CPO/CPB/75 dated 14.02.2023

Promotions in FRP are regulated under Police Rules Chapter 13 and Standing Order No. 01/2006, read alongwith Standing Order No. 02/2014. According to Standing Order No. 01/2006, the officials of FRP who were transferred to FRP would get one step promotion as long as they remained in the FRP. There were specified seats and special promotional courses i.e Drill, Platoon Commander & Section Commander courses. Over the course of years a practice developed that some of the educated FRP personnel got promotion on seats reserved for illiterate officials. Similarly, these very officers of FRP left the FRP Establishment without relinquishing the benefits that they gained in FRP and this give an accelerated promotion compared to their original colleagues in complete violation of Standing Order No. 01/2006, which stipulated that the officers who gets accelerated or one step promotion will leave FRP in his substantial rank.

Keeping in view, various courts decision and interpretation of AIG Legal CPO, promotion in FRP do not fall in the category of cadetship, gallantry and special case. It is also pertinent to mention here that FRP does not maintain seniority list i.e A, B, C, D & E and since 2014, both enlistment and promotion of FRP personnel's are carried out in the districts of their domicile.

The requisite information on the prescribed format is attached at annexure 'A'.

Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

CS CamScanner

ATTESTED
ADVOCATE



Better Copy

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OFFICE OF THE COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA PESHAWAR
PH: NO.091-9214114, FAX NO.9212602

[Handwritten initials]

No. _____ /EC dated 23/02/2022.

[Handwritten initials]

To: The Inspector General of Police,
Khyber Pakhtunkhwa, Central Police Office,
Peshawar.

Subject: IMPLEMENTATION OF THE JUDGMENT OF APEX COURT OF PAKISTAN

Respected Sir,

In continuation to this office memo: No.11585/EC dated 30-12-2021. It is submitted for kind information that the CPO has directed vide memo: No.CPO/CPB/449 dated 29-11-2021 & memo: No.CPO/CPB/456 dated 03-12-2021 for submission of consolidated report for implementation of the judgment of Apex Court of Pakistan pertains to out of turn promotions in the light of directives of CPO a committee comprising on the following officers was constituted by the Competent Authority, with the directions to scrutinize all kind of promotions granted to the personnel of FRP Unit and submit their report/recommendation for onward submission to CPO Peshawar:-

- | | |
|------------------------------|----------|
| 1. DSP/HQrs FRP Peshawar | Chairman |
| 2. Office Superintendent FRP | Member |
| 3. Inspector Akhtar Ali Khan | Member |
| 4. Inspector Yahya Shah Khan | Member |

The committee after fulfillment the due codal formalities and deliberation submitted a detail report and recommendations produced as below:-

1. BRIEF HISTORY OF FRP UNIT:-

FAR (Frontier Armed Reserves) now FRP (Frontier Reserve Police) was established by the Federal Govt. vide letter No:DO No:1/4/85-DD(P) dated 29-10-1985 and No:SO (P-II) 5-18/86/2347 dated 16-01-1986 as a reserve force according to Notification No:SO (P-II) HD/8-10/146-149 dated 16-01-1988 the Govt. of NWFP (now Khyber Pakhtunkhwa) Home Deptt. had merged the following ten Police Unit/Branches in FRP on 16-01-1988 with the name of "Frontier Armed Reserve as Frontier Reserve Police"

1. Additional Police
2. Special Police Levy
3. PAF Contingent
4. Range Reserve Platoons
5. Provincial Armed Reserve Platoons
6. Frontier Armed Reserves
7. Campus Peace Corps, Peshawar University

ATTESTED

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9. Mounted Police
10. Standing Guards and Police Escorts etc including those which provides to private bodies / person

2. DUTIES AND RESPONSIBILITIES

The duties and responsibilities of FRP were regulated from time to time through various Standing Orders issued by the Inspector General of Police, given the expanding role of policing which included but not limited to the following

3. CAREER PROGRESSION:

Frontier Reserve Police was basically raised to assist the District Police to tackle the law and order complexities, Sectarians problems, labor, student's agitations, subversive and Sabotage activities, Communal and ethnic riots in the province. For this purpose the entire force was organized into Platoons comprising 01/04/40 and distributed throughout the province. Moreover, on recommendation of Special Committee, the Inspector General of Police NWFP (Now Khyber Pakhtunkhwa) has approved a General Policy for FRP Unit that newly created posts of Districts should be filled up from transfer of the trained personnel of FRP according to seniority/Education and domicile. The vacant posts of constables should be filled up through fresh recruitment in FRP vide IGP circular order No. 1715-22 dated 24/08/1993. In view of above and Nature of the duties assigned to the FRP those Officials, who are illiterate or have failed to qualify the promotion test were promoted to the rank of Head Constable/Section Commander and Sub-Inspectors/Platoon Commanders on the basis of Section Commander/Platoon Commander courses. These Promotions were entirely made in accordance with the provision of Standing Order No. 03/1994, 03/1999 issued by the CPO Peshawar respectively after fulfilling the required criteria and codal formalities. However the above promotions were subsequently withdrawn on 07/06/2003 by the then Commandant FRP. Feeling aggrieved the officials concerned was filed Service Appeal before the Khyber Pakhtunkhwa Service Tribunal Peshawar against the said Order, which subsequently decided in their favor vide Judgment dated 29/11/2005. The decision of Honorable Tribunal was consented to be implemented in compliance of CPO Memo No. 9600/E-I dated 27/05/2005. Thereafter Standing Order No. 01/2006 was issued by the CPO Peshawar for the promotion of literate and illiterate officials of FRP. The worthy IGP KP vide letter No. 3271-3300 dated 19/06/1996 had already sanctioned 2/2 seats of lower/intermediate courses for the literate official of all FRP KP sanctioned strength. However subsequently Standing Order No. 1/2006 was repealed through Standing Order No. 02/2014 which the promotion system of FRP Officials has been withdrawn.

According to standing order No. 2/2014 the lien of all literate officials/officers

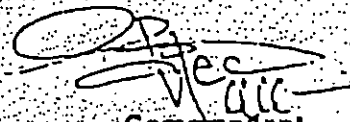
ATTESTED
ADVOCATE

it of laid down rules and bottom seniority has been given in the
five region district

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promotion granted to the FRP personnel are not fallen into the ambit of
turn promotions as they were promoted in accordance to the prescribed
rule and policy in vogue. It is pertinent to mention here that the officials
have qualified the requisite courses required for promotion were promoted
with their colleagues on their own turn and seniority come fitness
more. CPO Peshawar has already disclosed and opined vide letter No
Legal, dated 08.11.2021 to RPO Hazara that according to the
sent of Apex Court of Pakistan, if someone promoted on the basis
of kind of Incentive i.e. Gallantry, Cadetship and special case by
giving his batch-mates/colleagues, thus it is declared out of turn
promotions.

Keeping in view all of above it is further submitted that there
anyone has been promoted since 2014 in this establishment. Moreover
promotion so far granted to the officials concerned to FRP has not
injured/suffered someone from these promotions.



Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

AM
21/11/2021

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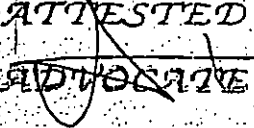
ADJUTANT

and further promotion are maintaining in their respective
Sections of domicile by concerned DPOs and RPOs as well
Further submitted that the literate officials of FRP transferred to domicile
on District regular police by the competent authority on holding positions in
the light of laid down rules and bottom seniority has been given in the
respective region/district

The promotion granted to the FRP personnel are not fallen into the ambit of
out of turn promotions as they were promoted in accordance to the prescribed
manner and policy in vogue. It is pertinent to mention here that the officials
who have qualified the requisite courses required for promotion were promoted
alongwith their colleagues on their own turn and seniority come fitness.
Furthermore, CPO Peshawar has already disclosed and opined vide letter No
11529/Legal, dated 08.11.2021 to RPO Hazara that according to the
Judgment of Apex Court of Pakistan, if someone promoted on the basis
of any kind of Incentive i.e. Gallantry, Cadetship and special case by
passing his batch-mates/colleagues, thus it is declared out of turn
promotions.

Keeping in view all of above it is further submitted that there
is no anyone has been promoted since 2014 in this establishment. Moreover
the promotion so far granted to the officials concerned to FRP has not
deprived/suffered someone from these promotions.


Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

ATTESTED

ADVOCATE

KPK Service Tribunal بعدالت
Peshawar

Appellant 2 منجانب

Shakil Ahmed بنام Govt of KPK Others

BC 17-7897

saleheennajam@gmail.com

0300 9013997

باعث تحریر آنگہ

موزع
مقدم
دعویٰ
م

نعم العیالین ایریزو لیسٹ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام لیسٹور کیلئے لیسٹور / عبدالحمید / عبدالحمید / خدو - بلال /
مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثیت فیصلہ برحلف دینے جناب دہی اور اقبال دعویٰ اور
بلا ضرورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا طرفہ یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل گمرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساتھ
پر واخیز منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانشین التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted

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المرقوم _____ ماہ _____ 20 _____

العبد _____ واہ العبد _____

مقام