

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Service appeal No. 311/2016

Date of institution ... 25.03.2016

Date of decision .... 18.02.2019

Imam Hussain Senior Clerk BPS-14 Interment Center Laki Marwat.

... (Appellant)

VersusGovernment of Khyber Pakhtunkhwa through Chief Secretary Peshawar  
and Nine others.

.. (Respondents)

PresentMr. Nasir Khan Afridi,  
Advocate

... For appellant.

Mr. Usman Ghani,  
District Attorney

... For respondents.

MR. HAMID FAROOQ DURRANI, ...  
MR. MUHAMMAD HAMID MUGHAL, ...CHAIRMAN  
MEMBER(J).JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

Appellant is aggrieved of notification dated 11.06.2015 issued by respondent No.3, whereby, the private respondents appearing at serial No.5 to 10 in the memorandum of appeal, were promoted to the post of Assistant (BPS-16) on regular basis. It is the claim of the appellant that the said respondents were junior to him in the seniority list settled on 01.04.2014. The appellant is also aggrieved of notification dated

23.06.2015 issued by respondent No.2, through which <sup>by</sup> ~~whereby~~ the promoted officials were transferred/posted.

2. We have heard learned counsel for the appellant and learned District Attorney on behalf of respondents and have also gone through the available record with their assistance.

The minutes of DPC held on 02.06.2015 indicate that the appellant was not considered suitable for promotion on account of inclusion of adverse remarks in his PER for the year 2014. He was, therefore, superseded. It is the case of the appellant that the remarks noted in his said PER were duly expunged on 19.11.2015, however, he was not considered for promotion subsequently and till his retirement on 14.04.2016.

3. Admittedly, the PER of appellant for the year 2014 was mended and adverse remarks removed there-from on a date which was subsequent to the date of DPC, therefore, the decision of DPC dated 02.06.2015 was unexceptionable which culminated into promotion of private respondents on 11.06.2015. However, after the expunction of adverse entries the appellant became entitled for consideration for promotion in the following meeting(s) of DPC which reportedly was not held till the date of his retirement. We must note that his stated right of consideration for promotion could not be extinguished due to incidence of his retirement, if he was otherwise eligible and qualified for the purpose.

4. In view of the above, we dispose of instant appeal in terms that the case of the appellant be considered for pro-forma promotion by the respondents, in case there are no legal or factual hurdles in the way.

Parties are left to bear their respective costs. File be consigned to the record room.





(Muhammad Hamid Mughal)  
Member



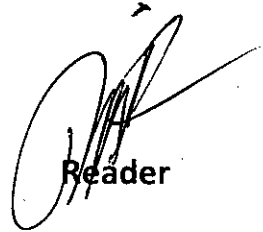
(Hamid Farooq Durrani)  
Chairman

ANNOUNCED  
18.02.2019

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	18.02.2019	<p><u>Present.</u></p> <p>Mr. Nasir Khan Afridi, ... For appellant Advocate</p> <p>Mr. Usman Ghani, ... For respondents District Attorney.</p> <p>Vide our detailed judgment of today, we dispose of the appeal in terms that the case of the appellant be considered for pro-forma promotion by the respondents, in case there are no legal or factual hurdles in the way. The Parties are left to bear their respective costs. File be consigned to the record room.</p> <p> Member</p> <p>Chairman </p> <p><u>ANNOUNCED</u> 18.2.2019</p>

02.11.2018

Appellant in person present. Mr. Usman Ghani, District Attorney for the respondents present. Due to retirement of Hon'ble Chairman, the Tribunal is incomplete. Therefore, the case is adjourned. To come up for the same on 24.12.2018.




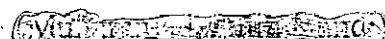
Reader

24.12.2018

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant seeks time to furnish copy of ACR of the appellant pertaining to the year 2014. Adjourned. To come for arguments on 18.02.2019 before D.B.



Member


  


Member

Service Appeal No. 311/2016

12.04.2018

Appellant with counsel present. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Sohrab Khan, Junior Clerk for the respondents also present. Record vide previous order sheet dated 14.02.2017 not submitted. Representative of the department requested for further time for production of record. Granted. To come up for record and arguments on 26.06.2018 before D.B.

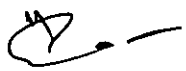
  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

26.06.2018

Appellant in person and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. Adjourned. To come up for arguments on 20.09.2018 before D.B.

  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

20.09.2018

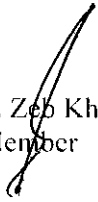
Since 12 September 2018 has been declared as public holiday on account of Muharam Ul Haram. Therefore, the case is adjourned. To come up for the same on


2-11-18

  
Reader

31.05.2017

Counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 25.09.2017 before D.B.

  
(Gul Zeb Khan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member


25.09.2017

Appellant in person and Mr. Muhammad Jan, DDA alongwith Mr. Shehryar, ASJ for the respondents present. Since learned Member (Mr. Ahmad Hassan) is on leave, therefore, arguments could not be heard. To come up for arguments on 08.12.2017 before D.B.

  
Chairman

08.12.2017

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents also present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 14.02.2018 before D.B.

  
(Ahmad Hassan)  
Member (E)

(Muhammad Amin Khan Kundi)  
Member (J)

14.02.2018

Appellant alongwith counsel and Mr. Ziaullah, Deputy District Attorney for the respondents present. During the arguments, it transpired that minutes of the meeting of DPC in which the appellant was not promoted are not available. The department is directed to produce the minutes of the meeting on the next date. To come up for arguments on 19.04.2018 before the D.B.

  
Member

  
Chairman

29 09.2016

Appellant in person and Mr. Sohrab Khan, Junior Clerk alongwith Addl. AG for the respondents present. Written reply by respondents No. 1 to 4 submitted while none present from private respondents No. 5 to 10. Proceeded ex-parte. The appeal is assigned to D.B for rejoinder and final hearing for 10.01.2017.

Rejoinder not submitted  
Chairman

10.0 .2017

Appellant in person and Mr. Shehreyar Khan, ASJ alongwith Assistant AG for respondents present. Rejoinder not submitted. Requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 31.05.2017.

  
(AHMAD HASSAN)  
MEMBER

  
(MUHAMMAD KAMIR NAZIR)  
MEMBER



25.4.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Senior Clerk BPS-14 and that his name was reflecting at S.No. 6 in the seniority list but was deprived of his right of promotion vide notification dated 11.6.2015 as junior officials reflecting at S.No. 7 to 10, 12 and 14 were promoted where-against the appellant preferred departmental appeal on 14.05.2015 which was not responded and hence the instant service appeal on 25.3.2016.

That the appellant is entitled to promotion to BPS-16 w.e.f. 11<sup>th</sup> June, 2015 particularly when the adverse remarks were expunged vide enquiry concluded on 19.11.2015 and when the appellant was senior-cum-fit.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 21.07.2016 before S.B.

  
Chairman

21.07.2016

Appellant in person and Mr. Sheharyar Khan, ASJ alongwith Additional AG for the respondents present. Written reply not submitted. Learned Additional AG requested for time to file written reply. Last opportunity granted. To come up for written reply/comments on 29.09.2016 before S.B.




  
MEMBER

Appellant Deposited  
Security & Process Fee

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 311/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	0.03.2016	<p>The appeal of Mr. Imam Hussain resubmitted today by Mr. Raja Muhammad Ijaz Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR -</p>
2	30-3-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>11-4-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
11.04.2016		<p>Counsel for the appellant present. Seeks adjournment. Adjourned for preliminary hearing to 25.4.2016 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Imam Hussain Senior Clerk Internment Centre Laki Marwat received to-day i.e. on 25.03.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Addresses of respondent no. 5 to 10 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 296 /S.T,

Dt. 25/3 /2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Nasir Khan Afridi Adv. Pesh.

Note:- Resubmission after removal of objection/deficiency and completion of Petition.

  
Advocate  
30/3/16



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**BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR**

Service Appeal No. 311 /2016

Imam Hussain  
.....  
Appellant

**VERSUS**

Govt. of KPK and others  
.....  
Respondents

**INDEX**

S.No	Description of Documents	Annex	Pages
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Appellant  
Through



Nasir Khan Afridi  
Advocate, High Court  
Peshawar

Date: 25-03-2016

①

BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHAWA,  
PESHAWAR

Service Appeal No. 311 /2016

**N.W.F. Province**  
**Service Tribunal**  
Diary No 265  
Dated 25-03-2016

Imam Hussain senior clerk BPS-14 Internment center Laki Marwat  
.....Appellant

**VERSUS**

1. GOVT OF KHYBER PAKHTUNKHWA  
Through Chief Secretary, Peshawar.
2. Inspector General of prison Khyber Pakhtunkhwa Peshawar
3. Secretary to Government Of Khyber Pakhtunkhwa Home & tribal Affairs  
Department Peshawar.
4. Superintendent Incharged Internment Center Laki Marwat
5. Mr. Abid Husain<sup>ASST.</sup> posted Central prison Banu
6. Mr. Niaz Ali<sup>ASST.</sup> posted District jail /HSP Mardan
7. Mr. Raj Wali<sup>ASST.</sup> District jail /HSP Mardan
8. Mr. Muhammad Ali<sup>ASST.</sup> Posted District jail Kohat
9. Mr. Abid Jamal<sup>ASST.</sup> District jail /HSP Mardan
10. Mr. Muhammad Javid<sup>ASST.</sup> Office of the Inspector General Prison Peshawar  
See address of parties at Page no. 6

B + P  
29/3/16

.....Respondents

SERVICE APPEAL U/S 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION NO. SO(Prison)-HD/8-6/2013/BC-137240. 11/06/2015 AND NOTIFICATION NO. 17397 DATED 23/06/2015 WHEREBY THE RESPONDENTS NO 5 TO 10 HAVE BEEN PROMOTED WHO WERE JUNIOR TO APPELLANT AS PER SENIORITY LIST NO

Filed to the  
Registrar  
25/3/16

re-submitted to the  
Registrar  
30/3/16

8/24-J-2007/13246 DATED 20/05/2014. SAID PROMOTION NOTIFICATIONS ARE ILLEGAL INCORRECT AGAINST THE LAW AND APPELLANT BEING SENIOR MOST IS ENTITLED FOR PROMOTION PRAYER.

ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED NOTIFICATIONS MAY KINDLY BE SET ASIDE BEING AGAINST THE LAW AND RULES AND APPELLANT BE PROMOTED WITH ALL BACK BENEFITS. ANY OTHER REMEDY WHICH DEEMS PROPER MAY ALSO BE GRANTED.

Respectfully Sheweth:

Short facts giving to the present appeal are as under:

1. That appellant was joined the service on 25/6/1990 and serving as senior clerk BPS 14 attached with Internment center Laki Marwat department of home and tribal affair Khyber Pakhtunkhwa office of the Inspector General of Kyber Pakhtunkhwa having outstanding ACRS throughout. (Copies of the ACRS are attached as Annexure "A")
2. That the office of the Inspector General prison Khyber Pakhtunkhwa Peshawar No.8/24-J-2007/13246 dated 20/5/2014 issued / circulated final seniority list of senior clerks, whereby the name of the appellant shown on serial no 6. (copies of Seniority List is as Annexure "B")
3. That the respondent No 2 and 3 issued the impugned notifications no. SO(Prison)-HD/8-6/2013/BC-137240 Dated 11/06/2015 order of

promotion of the respondents no.5 to 10 / senior clerks from BPS 14 to BPS 16 and impugned posting transfer order dated 23/06/2015 while ignoring the seniority of the appellant.( Copies of the notifications are Annexure "C")

4. That the appellant is on serial no 6, of the seniority list ,meanwhile some adverse remarks were recorded in the P.E.R-2014 on appeal adverse remarks were expunged vide Government of Khyber Pakhtunkhwa Home and tribal affair department S.O Prison notification number SO(PRISONS)HD/P-F/1-12/2015/BC-DATED 19/11/2015. (Copies of appeal and Notification are Annexure 'D')
5. That feeling aggrieved from the impugned Notifications /promotion the appellant filed the departmental appeal on 13/11/2015 however it was not replied despite the lapse of 90 days. the appellant is assailed before this Honorable Tribunal on the following grounds inter alia: (Copies of appeal are Annexure "E")

#### GROUND S:

- A. That the act of respondents, not placing the name of the appellant as per seniority list for promotion is illegal, without lawful authority, without jurisdiction and violation of the rules and law is liable to be modified in the above terms.
- B. That the respondents have committed a legal error by not considering the name of the appellant for promotion being senior and fit candidate and promoted the juniors despite the fact that the vacancies are still vacant



therefore, the respondents acted in disregard of law and judgments of the superior courts, warrants interference.

- C. That the respondents No 1 to 4 ignored the services rendered by the appellant to the department and promoted the respondent no 5 to 10 despite the fact that they are Junior as per seniority list, appellant is old age and is near to his retirement is entitled to promotion as a right.
- D. That the Act of the Respondents is against the Articles 4, 25, & 27 of the Constitution of Islamic Republic of Pakistan 1973
- E. That the appellant has been discriminated against as there are similarly placed other employees who are promoted and in the case of the appellant it was denied to him.
- F. That the appellant seeks leave of this Honorable Tribunal to raise / argue any additional point at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this service appeal, this Honorable Tribunal may graciously be pleased to declare the appellant senior to the respondents no. 5 to 10 and be promoted being senior and deserving with all back benefits from the date of promotion

Imam Hussain  
Appellant

Through

Nasir Khan Afridi

Nasir Khan Afridi  
Advocate, High Court  
Peshawar

Date: 25/03/2016

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. \_\_\_\_\_ /2015

Imam Hussain ..... Appellant

**VERSUS**

Govt. of KPK and others ..... Respondents

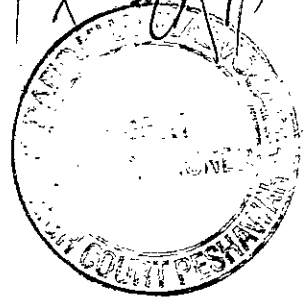
AFFIDAVIT

I, Imam Husain BPS-14 Senior Clarke attached with Internment centre Laki Marwat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Imam Hussain  
DEPONENT

ATTESTED

Handwritten signature and date 27/9/16



BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. \_\_\_\_\_/2016

Imam Hussain ..... Appellant

VERSUS

Govt. of KPK and others ..... RespondentsADDRESSES OF PARTIESAPPELLANT:

Imam Husain senior clerk BPS-14 Internment center Laki Marwat.

RESPONDENTS:

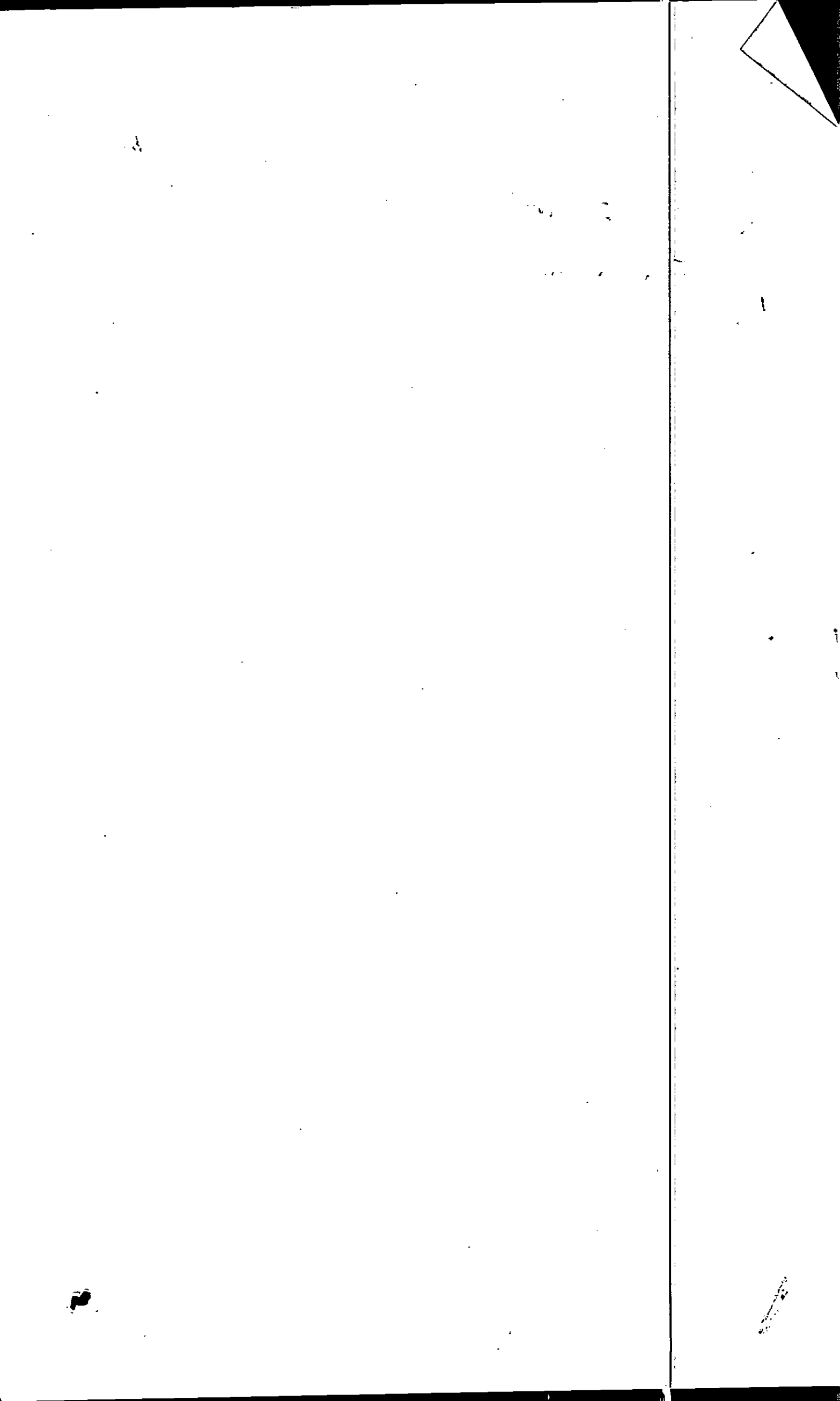
1. GOVT OF KHYBER PAKHTUNKHWA  
Through Chief Secretary, Peshawar.
2. Inspector General of prison Khyber Pakhtunkhwa Peshawar
3. Secretary to Government Of Khyber Pakhtunkhwa Home & tribal Affairs  
Department Peshawar.
4. Superintendent Incharged Internment Center Laki Marwat
5. Mr. Abid Husain post of Assistant (BPS-16) Central prison D.I Khan.
6. Mr. Niaz Ali post of Assistant (BPS-16) High Security Prison Mardan.
7. Mr. Raj Wali post of Assistant (BPS-16) High Security Prison Mardan.
8. Mr. Muhammad Ali post of Assistant (BPS-16) Inspector General Prison  
KPK Peshawar.
9. Mr. Abid Jamal post of Assistant (BPS-16) High Security Prison Mardan.
10. Mr. Muhammad Javid post of Assistant (BPS-16) Inspector General Prison  
KPK Peshawar.

Imam Hussain  
Appellant

Through

Nasir Khan Afridi  
Nasir Khan Afridi  
Advocate, High Court  
Peshawar

Date: 29-03-2016



Form 'G' (Revised)  
Assistant and Clerks

Annexure 'A'

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 08-03-2013 to 02-08-2013

PART-I

- 1. Name Jamoon / 185/111
- 2. Designation Senior Clerk
- 3. Date of Birth 15-04-1956
- 4. Date of Entry into Government service 24-6-1990
- 5. Branches in which employed during the year, with period pay and allowances

PART-II

A. PERFORMANCE		AI	A	B	C	D
1.	Referencing, paging of notes and correspondence.			E		
2.	Movement of Files and record of suspense cases.			E		
3.	Keeping files and Papers tidy condition			E		
4.	Promptness and accuracy in disposing			E		
B. PERSONAL TRAITS						
5.	Intelligence.			E		
6.	Knowledge of Procedures and Regulations.			E		
7.	Punctuality			E		
8.	Cooperation and Tact.			E		
9.	Amenability to Discipline			E		
10.	Skill in Drafting.			E		

- 11. Integrity
  - i). Incorruptible
  - ii). Reported to be corrupt
  - iii). Believed to be corrupt, because
    - a. Monetary Consideration
    - b. Other Considerations

Assessment

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Attested  
Sikhan  
Advocate

8

- |  | Yes                                 | No                       |
|--|-------------------------------------|--------------------------|
| 12. Knowledge of Typing  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. Trust Worthiness in confinement matters.                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 14. Any Disciplinary action taken during the period of under report. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

PART-III

- |   | Reporting Officer. | Countersigning Officer. |
|---|--------------------|-------------------------|
| a. Recommended for acceleration promotion                               |                    |                         |
| b. Fit for promotion  | <i>M. H. Khan</i>  |                         |
| c. Recently promoted / appointed consideration for promotion pre-mature |                    |                         |
| d. Not yet fit for promotion.   |                    |                         |
| e. Unfit for further promotion.   |                    |                         |

PART-IV

- | General Assessment                           | By Reporting Officer | By Countersigning Officer |
|--|----------------------|---------------------------|
| i. Very good                                 |                      |                           |
| ii. Good <input checked="" type="checkbox"/> | <i>M. H. Khan</i>    |                           |
| iii. Average                                 |                      |                           |
| iv. Below Average                            |                      |                           |
| v. Poor                                      |                      |                           |

SIGNATURE

Reporting Officer's Signature *[Signature]*  
 Name (in Block Letters) **SAHIBUDDIN KHAN**  
 Designation *[Signature]*

Dated \_\_\_\_\_

GENERAL REMARKS BY HIGHER OFFICER

*Seen*

*Attended  
[Signature]  
Advocate*

Countersigning Officer's Signature *[Signature]*  
 Name (In Block Letters) **KHALID ABBAS**  
 Designation *The then IG Prisons KPK*

Form 'G' (Revised)  
Assistant and Clerks

# GOVERNMENT OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT

## CONFIDENTIAL REPORT

For the period from 08-03-2013 to 02-08-2013

### PART-I

1. Name Imam Hussain
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 24-06-1990
5. Branches in which employed during the year, with period Pay and Allowances

### PART-II

#### A. PERFORMANCE

	AI	A	B	C	D
1. Referencing, paging of notes and correspondence					
2. Movement of Files and record of suspense cases.					
3. Keeping files and Papers tidy condition					
4. Promptness and accuracy in disposing					
B. PERSONAL TRAITS					
5. Intelligence.					
6. Knowledge of Procedures and Regulations.					
7. Punctuality					
8. Cooperation and Tact.					
9. Amenability to Discipline					
10. Skill in Drafting.					

11. Integrity
  - i). Incorruptible
  - ii). Reported to be corrupt
  - iii). Believed to be corrupt, because of
    - a. Monetary Consideration
    - b. Other Considerations

Assessment

\_\_\_\_\_

M. A. J.

\_\_\_\_\_

\_\_\_\_\_

*Attested*  
S. Khan  
*Advocate*

10

- 12. knowledge of Typing Yes Yes No
- 13. Trust Worthiness in confinement and secret matters. \_\_\_\_\_
- 14. Any Disciplinary action taken during the period under report. \_\_\_\_\_

PART-III

By: \_\_\_\_\_ By: \_\_\_\_\_

- a. Recommended for acceleration promotion Reporting Officer: \_\_\_\_\_ Countersigning Officer: \_\_\_\_\_
- b. Fit for promotion Not fit for promotion
- c. Recently promoted / appointed consideration for promotion pre-mature \_\_\_\_\_
- d. Not yet fit for promotion. \_\_\_\_\_
- e. Unfit for further promotion. \_\_\_\_\_

PART-IV

General Assessment

- i. Very good By Reporting Officer: \_\_\_\_\_ By Countersigning Officer: \_\_\_\_\_
- ii. Good Good
- iii. Average \_\_\_\_\_
- iv. Below Average \_\_\_\_\_
- v. Poor \_\_\_\_\_

PEN PICTURE

Reporting Officer's Signature [Signature]  
 Name (in Block Letters) SAIF UDDIN KHAN  
 Designation SA

GENERAL REMARKS BY HIGHER OFFICER

Seen

Countersigning Officer's Signature [Signature]  
 Name (In Block Letters) KARIM ABBAS  
 Designation The then Iq. Prisoner KPRC

Attested  
[Signature]  
Advocate

Dated \_\_\_\_\_



Form "G" (Revised)  
Assistant and Clerks

11

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 02-02-2015 to 23-06-2015.

PART-I

1. Name Imam Hussain
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 24-06-1990
5. Branches in which employed during the year, with period pay and Allowances, Msk E To

PART-II

A. PERFORMANCE	AI	A	B	C	D
1. Referencing, paging of notes and correspondence	<u>B</u>				
2. Movement of Files and record of suspense cases.	<u>B</u>				
3. Keeping files and Papers tidy condition	<u>B</u>				
4. Promptness and accuracy in disposing	<u>B</u>				
B. PERSONAL TRAITS					
5. Intelligence		<u>B</u>			
6. Knowledge of Procedures and Regulations		<u>B</u>			
7. Punctuality	<u>B</u>				
8. Cooperation and Fact.	<u>B</u>				
9. Amenability to Discipline	<u>B</u>				
10. Skill in Drafting		<u>B</u>			

11. Integrity

Assessment

- i). Incorruptible Not Corrupt
- ii). Reported to be corrupt No
- iii). Believed to be corrupt, because of
  - a. Monetary Consideration No
  - b. Other Considerations No

Attested  
Sahai  
Advocate

12

	Yes	No
Knowledge of Typing	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Trustworthiness in confinement and secret matters.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Any Disciplinary action taken during the period of under report.	<input type="checkbox"/>	<input checked="" type="checkbox"/> No

By \_\_\_\_\_ By \_\_\_\_\_

PART-III

	Reporting Officer	Countersigning Officer
a. Recommended for acceleration promotion	<input type="checkbox"/>	<input type="checkbox"/>
b. Fit for promotion	<input checked="" type="checkbox"/> Fit for promotion	<input type="checkbox"/>
c. Recently promoted / appointed consideration for promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
d. Not yet fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
e. Unfit for further promotion.	<input type="checkbox"/>	<input type="checkbox"/>

PART-IV

General Assessment	By Reporting Officer	By Countersigning Officer
i. Very good	<input checked="" type="checkbox"/> Very good	<input type="checkbox"/>
ii. Good	<input type="checkbox"/>	<input type="checkbox"/>
iii. Average	<input type="checkbox"/>	<input type="checkbox"/>
iv. Below average	<input type="checkbox"/>	<input type="checkbox"/>
Poor	<input type="checkbox"/>	<input type="checkbox"/>

PEN PICTURE

He is hard worker showing his job and fit for promotion on his turn.

Reporting Officer's Signature

Name (in Block Letters) SABZ ALI

Designation Sr. Assistant Superintendent Jail.

GENERAL REMARKS BY HIGHER OFFICER

Countersigning Officer's Signature

Name (in Block Letters) SIAAJ AHMA

Designation

Attested  
SIAAJ AHMA  
Advocate

Form "G" (Revised)  
Assistant and Clerks

13

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 02-02-2015 to 23-06-2015.

**PART-I**

1. Name Imam Hussain.  
 2. Designation Senior clerk.  
 3. Date of Birth 15-04-1956.  
 4. Date of Entry into Government service 24-06-1990.  
 5. Branches in which employed during the year, with period pay and Allowances, MSK ETC.

**PART-II**

A.	PERFORMANCE	AI	A	B	C	D
1.	Referencing, paging of notes and correspondence	\$				
2.	Movement of Files and record of suspense cases.	\$				
3.	Keeping files and Papers tidy condition	\$				
4.	Promptness and accuracy in disposing	\$				
B.	PERSONAL TRAITS					
5.	Intelligence		\$			
6.	Knowledge of Procedures and Regulations.		\$			
7.	Punctuality	\$				
8.	Cooperation and Tact.	\$				
9.	Amenability to Discipline	\$				
10.	Skill in Drafting.		\$			

11. Integrity Assessment

i). Incorruptible NO+ Corrupted \$

ii). Reported to be corrupt NO- \$

iii). Believed to be corrupt, because of

a. Monetary Consideration NO- \$

b. Other Considerations NO- \$

Attested  
S. Khan  
 Advocate

141

	Yes	No
1. Knowledge of Typing	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Trustworthiness in confinement and secret matter	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Any disciplinary action taken during the period of under report.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> NO

By \_\_\_\_\_ By \_\_\_\_\_

**PART-III**

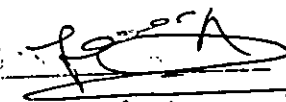
	Reporting Officer	Countersigning Officer
a. Recommended for acceleration promotion	<input type="checkbox"/>	<input type="checkbox"/>
b. Fit for promotion	<input checked="" type="checkbox"/> Fit for promotion	<input type="checkbox"/>
c. Recently promoted / appointed consideration for promotion pre-mature	<input type="checkbox"/>	<input type="checkbox"/>
d. Not fit for promotion.	<input type="checkbox"/>	<input type="checkbox"/>
e. Unfit for further promotion.	<input type="checkbox"/>	<input type="checkbox"/>

**PART-IV**

General Assessment	By Reporting Officer	By Countersigning Officer
i. Very good	<input checked="" type="checkbox"/> very good	<input type="checkbox"/>
ii. Good	<input type="checkbox"/>	<input type="checkbox"/>
iii. Average	<input type="checkbox"/>	<input type="checkbox"/>
iv. Below Average	<input type="checkbox"/>	<input type="checkbox"/>
v. Poor	<input type="checkbox"/>	<input type="checkbox"/>

PEN PICTURE

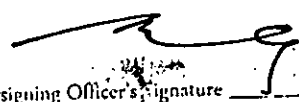
He is hard worker, knowing his job and fit for promotion on his turn.

Reporting Officer's Signature: 

Name (in Block Letters) SA BZ ALI

Designation SA Assistant Superintendent Jail

**GENERAL REMARKS BY HIGHER OFFICER**

Countersigning Officer's Signature: 

Name (in Block Letters) SIRAJ AHMED

Designation \_\_\_\_\_

Attested  
  
Advocate

Form 'G' (Revised)  
Assistant and Clerks

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 24-6-2015 to 31-12-2015

PART-I

1. Name IMAM HUSSAIN
2. Designation SENIOR CLERK
3. Date of Birth 15-04-1956
4. Date of Entry into Government Service 24-06-1990
5. Branches in which employed during the period PAY AND ALLOWANCE AND MSK

PART-II

A. PERFORMANCE	AI	A	B	C	D
1. Referencing, paging of notes and correspondence	✓✓				
2. Movement of Files and record of suspense cases.		✓✓			
3. Keeping files and Papers tidy condition	✓✓				
4. Promptness and accuracy in disposing	✓✓				
B. PERSONAL TRAITS	✓✓				
5. Intelligence.	✓✓				
6. Knowledge of Procedures and Regulations.	✓✓				
7. Punctuality	✓✓				
8. Cooperation and Tact.	✓✓				
9. Amenability to Discipline	✓✓				
10. Skill in Drafting.	✓✓				

11. Integrity
- Assessment
- i). Incorruptible - NOT CORROPT - ✓
  - ii). Reported to be corrupt - NO - ✓
  - iii). Believed to be corrupt, because of
    - a. Monetary Consideration - No - ✓
    - b. Other Considerations - NO - ✓

*Attested  
Imam  
Advocate*

16

- 12. Knowledge of Typing Yes YES No ✓
- 13. Just Worthiness in confinement matters. Yes YES No ✓
- 14. Any Disciplinary action taken during the period under report. - ✓

By \_\_\_\_\_ By \_\_\_\_\_

- |   |                   |                        |
|---|-------------------|------------------------|
|   | Reporting Officer | Countersigning Officer |
| a. Recommended for acceleration promotion                                   | <u>YES</u> ✓      |                        |
| b. Fit for promotion  | <u>YES</u> ✓      |                        |
| c. Recently promoted / appointed for consideration for promotion pre-mature | - ✓               |                        |
| d. Not yet fit for promotion.   | <u>NO</u> ✓       |                        |
| e. Unfit for further promotion.   | <u>NO</u> ✓       |                        |

PART-IV

General Assessment

- |                   |                      |                           |
|-------------------|----------------------|---------------------------|
|                   | By Reporting Officer | By Countersigning Officer |
| i. Very good      | <u>VERY GOOD</u> ✓   |                           |
| ii. Good          | - ✓                  |                           |
| iii. Average      | - ✓                  |                           |
| iv. Below Average | - ✓                  |                           |
| v. Poor           | - ✓                  |                           |

**PEN PICTURE**  
 He is hardworking, efficient and Professional in his Job and well fit for promotion. ✓

Reporting Officer's Signature [Signature]  
 Name (in Block Letters) SYED MDHYUDDIN SHAH

Designation INCHARGE INTERNMENT CENTER LAKKI MARGAT  
Superintendent/Incharge Internment Center LAKKI MARGAT

Countersigning Officer's Signature \_\_\_\_\_  
 Name (In Block Letters) \_\_\_\_\_  
 Designation \_\_\_\_\_

Attended  
[Signature]  
 Advocate

Dated \_\_\_\_\_

17

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 24-6-2015 to 31-12-2015

PART-I

1. Name Imran Hussaini
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 24-06-1990
5. Branches in which employed during the year, with period Allowance and Mele Pay and

P/T-II

A. PERFORMANCE

	AI	A	B	C	D
1. Referencing, paging of notes and correspondence	✓	✓			
2. Movement of Files and record of suspense cases.					
3. Keeping files and Papers tidy condition		✓			
4. Promptness and accuracy in disposal	✓	✓			
B. PERSONAL TRAITS					
5. Intelligence.	✓	✓			
6. Knowledge of Procedures and Regulations.	✓	✓			
7. Punctuality	✓	✓			
8. Cooperation and Tact.	✓	✓			
9. Amenability to Discipline	✓	✓			
10. Skill in Drafting.	✓	✓			

II. Integrity

Assessment

- i). Incorruptible - NOT CORRUPT - ✓
- ii). Reported to be corrupt - NO - ✓
- iii). Believed to be corrupt, because of
  - a. Monetary Consideration - NO - ✓
  - Other Considerations - NO - ✓

Attested  
S. J. Khan  
Advocate

17. Knowledge of Typing  Yes  No

18. Friskiness in confinement and secret matter  Yes  No

19. Any disciplinary action taken during the period of und... report  -

PART-III

Reporting Officer  Yes  No

Countersigning Officer  Yes  No

a. Recommended for acceleration promotion  Yes  No

b. Fit for promotion  Yes  No

c. Recommended / appointed / promotion pre-mature  No  Yes

d. Not fit for promotion  No  Yes

e. Unfit for further promotion  No  Yes

General Assessment

Very Good  Good  Average  Below Average  Poor

By Countersigning Officer

Reporting Officer

PEN PICTURE

He is working efficient and professional in his job and fit for promotion

Reporting Officer's Signature *[Signature]*

Name (in Block Letters) SYED MOHYUDDIN SHAIKH

Designation INCHARGE INTERNMENT CENTER LAKKI MARKET

GENERAL REMARKS BY HIGHER OFFICER SUPERINTENDENT/INCHARGE INTERNMENT CENTER LAKKI MARKET

Countersigning Officer's Signature \_\_\_\_\_

Name (in Block Letters) \_\_\_\_\_

*Advocate*

*SHAIKH*

*[Signature]*



Attested  
Shivan  
Advocate

SUPERINTENDENT  
CENTRAL JAIL BANNU

✓ SUPERINTENDENT  
CENTRAL JAIL BANNU

It is Subm. of that ACR-2013  
(From 08-03-2013 to  
Mr. Iqbal Hussain Secy  
here with for your  
action please  
-08-2013) in respect of  
Clerk - BPS-14 is enclosed

Memo:

Mr. Bhattar, Iqbal  
EX - BU Permenent job  
Subject: ACR-2013 (From 08-3-2013 to 02-8-2013  
in respect of Mr. Iqbal Hussain  
Senior Clerk - BPS-14

No. So-we dated 5/10/2015

(19)

10

20

OFFICE OF THE  
SUPERINTENDENT/ INCHARGE  
INTERMENT CENTRE LAKKIMARWAT  
NO: 34 /WE DATED 08-01-2016

To:

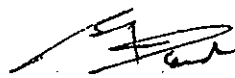
The Worthy Inspector General of Prisons,  
Khyber Pakhtunkhawa , Peshawar .

Subject:-

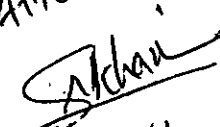
SUBMISSION OF P.E.R FOR THE PERIOD FROM  
24-06-2015 to 31-12-2015 IN RESPECT OF  
MR. IMAM HUSSAIN , SENIOR CLERK BPS-14 .

Memo:

It is submitted for your kind information that  
P.E.R. for the period from 24-06-2015 to 31-12-2015 in respect  
of Mr. Imam Hussain, Senior Clerk BPS-14 is enclosed herewith  
for your kind perusal and favourable action please .

  
SUPERINTENDENT/INCHARGE  
INTERMENT CENTRE  
LAKKIMARWAT



Attested  
  
Advocate

CONFIDENTIAL

Encls no: 01 ltr dt 22/2/2016

To,

The Worthy Inspector General of Prisons  
Kalya Prabhakar, Peshkar

Subj: ANNUAL CONFIDENTIAL REPORT

As the honor to State

that annual confidential report

for the period from 02-2-2015

to 23-02-2015 in respect of

Prison Officer Senior class of

that period when I was attached

to Maharashtra State Prisonat

as Incharge Prisoner.

R/S:

Encl: (2)

Yours obediently  
[Signature]

(Sd/- S. S. Kulkarni)  
Central Prison, Ahmednagar

Attested  
[Signature]  
Advocate

Annexure 'B'

22

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWARNO. 8/24-J-2007/13246DATED 20-05-2014.

## NOTIFICATION

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, Final Seniority list of Senior Clerks (BPS-09) as it stood on 01-4-2014 is notified/circulated:-

S#	NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT.	DATE OF 1 <sup>st</sup> ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION			PRESENT APPOINTMENT	REMARKS
				DATE	BPS	METHOD OF APPOINTMENT.		
1.	Mr. Irfanullah (B.A)	01-11-1959 (Charsadda)	02-03-1986	14-10-2005	9	By promotion	Senior Clerk.	Seniority maintained as in lower scale.
2.	Mr. Prain (D.Com)	25-04-1965 (Peshawar)	01-11-1987	01-11-2005	9	-do-	Senior Clerk.	-do-
3.	Mr. Akhtar Shah (F.A)	11-04-1967 (Peshawar)	Warder 03-05-1986 J/Clerk 02-10-1988.	14-10-2005	9	-do-	Senior Clerk.	-do-
4.	Mr. Anayat-ur-Rehman (F.A)	24-11-1964 (Abbottabad)	Warder 24-04-1987 J/Clerk 27-1-1990.	01-11-2005	9	-do-	Senior Clerk.	-do-
5.	Mr. Zahir Shah (Matric)	15-02-1968 (Charsadda)	31-05-1990	7-11-2005	9	-do-	Senior Clerk.	-do-
6.	Mr. Imam Hussain. (F.A)	15-04-1956 (Kohat)	25-06-1990	7-11-2005	9	-do-	Senior Clerk	-do-
7.	Mr. Abid Hussain (D.Com)	05-01-1967 (D.I.Khan).	29-09-1990	04-08-2006	9	-do-	Senior Clerk.	-do-
8.	Mr. Niaz Ali (FA)	10-04-1968 (Charsadda)	17-11-1990	19-07-2006	9	-do-	Senior Clerk.	-do-
9.	Mr. Raj Wali (B.A)	20-02-1969 (Molmand Agency)	24-11-1990	24-08-2006	9	-do-	Senior Clerk.	-do-
10.	Mr. Muhammad Ali (M.A)	14-11-1957 (Molmand Agency)	06-08-1986	1-9-2008	9	-do-	Senior Clerk.	-do-
11.	Mr. Ali Haider (B.A)	3-12-1961 (Peshawar)	20-4-1987	1-9-2008	9	-do-	Senior Clerk.	-do-
12.	Mr. Abid Jamal (D.Com)	12-04-1967 (Peshawar)	03-08-1991	17-9-2008	9	-do-	Senior Clerk.	-do-
13.	Mr. Muhammad Laif Khan (Matric)	07-02-1965 (Bannu)	19-09-1991	1-10-2008	9	-do-	Senior Clerk.	-do-

Attested  
Advocate



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

23

NO. \_\_\_\_\_

DATED 20-05-2014

14	Mr. Muhammad Javed	(F.A)	14-10-1973 (Charsadda)	26-09-1992	28-2-2009	9	-do-	Senior Clerk.	-do-
15	Mr. Sajid Ali	(F.A)	01-01-1974 (Peshawar)	Warder 24-08-1991 J/Clerk 06-4-1993	10-02-2009	9	-do-	Senior Clerk.	-do-
16	Mr. Khadim Shah	(M.A)	16-04-1969 (Charsadda)	26-09-1993	08-9-2010	9	-do-	Senior Clerk.	do-
17	Mr. Muhammad Yar	(Matric)	01-12-1964 (Dir Lower)	Warder 27-04-1982 J/Clerk 01-5-1993.	22-11-2011	9	-do-	Senior Clerk.	-do-
18	Mr. Muhammad Jehangir	(B.A)	15-11-1972 (Mohmand Agency)	05-12-1997	01-12-2011	9	-do-	Senior Clerk.	-do-
19	Mr. Yousaf Khan	(B.A)	18-07-1972 (Khyber Agency)	10-12-1997	22-11-2011	9	-do-	Senior Clerk.	-do-
20	Mr. Asif Shah.	(B.A)	02-04-1978 (Haripur)	12-12-1997	22-11-2011	9	-do-	Senior Clerk.	-do-
21	Syed Rahim Shah	(B.A)	15-04-1974 (Swat)	13-12-1997	27-2-2013	9	-do-	Senior Clerk.	-do-
22	Mr. Sardar Ali	(F.A)	11-11-1972 (Peshawar)	3-7-1993	28-2-2013	9	-do-	Senior Clerk.	-do-
23	Mr. Muhammad Saeed	(B.A)	10-4-1974 (Khyber Agency)	1-8-1996	27-2-2013	9	-do-	Senior Clerk.	-do-
24	Mr. Muhammad Atif Nawaz Qureshi	(F.A)	8-8-1975 (D.I.Khan)	Warder 01-10-1997 J/Clerk 23-6-2004.	4-3-2013	9	-do-	Senior Clerk.	-do-
25	Mr. Atiqur Rehman	(M.A)	10-5-1977 (D.I.Khan)	Warder 08-5-1999 J/Clerk 23-6-2004.	27-2-2013	9	-do-	Senior Clerk.	-do-
26	Mr. Abdul Hamid Abbasi	(B.A)	4-4-1975 (Abbottabad)	Warder 03-10-1997 J/Clerk 05-7-2004.	19-12-2013	9	-do-	Senior Clerk.	-do-
27	Mueed Rashid	(BA/LLB/DIT)	15-3-1983 (Lakki Marwat)	5-11-2004	19-12-2013	9	-do-	Senior Clerk	-do-

*Mueed  
Shah  
Advocate*

*1107  
26-5-2014*

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.



8-3-

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

24

NO. \_\_\_\_\_


DATED 20-05-2014

ENDST; NO. 13247-72 1.

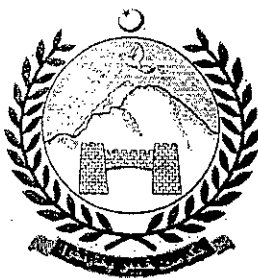
Copy of the above is forwarded to :-

1. All Superintendents of Jails /Lockups/Internment Centres.
2. Office Accountant/.

For information of the officials concerned.

  
ASSISTANT DIRECTOR (ADMN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

Attested  
S. N. Khan  
Advocate



Annexure 'C' (25)  
**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**HOME & TRIBAL AFFAIRS DEPARTMENT**

**NOTIFICATION**

**No.SO(Prisons)-HD/8-6/2013/ BC-137240.** The Competent Authority in consultation with the Departmental Promotion Committee is pleased to order promotion of the following Senior Clerks (BPS-14) to the post of Assistant (BPS-16) on regular basis, with immediate effect:-

- 1- Mr. Irfanullah,
- 2- Mr.Anayat-ur-Rehman.
- 3- Mr.Zahir Shah.
- 4- Mr.Abid Hussain.
- 5- Mr.Niaz Ali.
- 6- Mr.Raj Wali.
- 7- Mr.Muhammad Ali.
- 8- Mr.Abid Jamal.
- 9- Mr.Muhammad Javed.
- 10- Mr.Sajid Ali.

The officers from S.No.1 to 10 above will be on probation for a period of one year in terms of Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules-1989 and Section 6 (2) of Khyber Pakhtunkhwa Civil Servant Act 1973.

Their services are hereby placed at the disposal of Inspector General of Prisons Khyber Pakhtunkhwa for their further posting.

**Secretary to Government of  
Khyber Pakhtunkhwa Home & T.As  
Department Peshawar**

Dated the, 11<sup>th</sup> June, 2015, Peshawar.

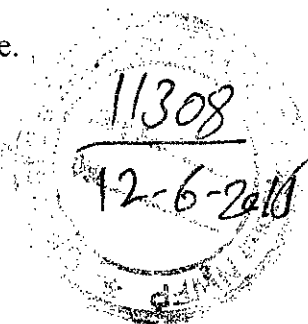
**(Rehmat Ali Wazir)**  
**SECTION OFFICER (PRISONS)**

**No.SO(Prisons)-HD/8-6/2013/ BC-137240.- Dated the, 11<sup>th</sup> June, 2015, Peshawar.**

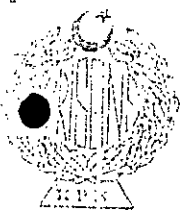
A copy is forwarded for information and necessary action to :-

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar, for information and necessary action.
3. Director IT, Home & TAs Department, Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary Home, Khyber Pakhtunkhwa.
5. PS to Special Secretary Home, Khyber Pakhtunkhwa.
6. Officer Concerned.
7. Master file/Office Order file.

*Attested  
S Khair  
Advocate*



**SECTION OFFICER (PRISONS)**



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

26

NO. 17397

DATED 23/06/2015 Date of Transfer

ORDER

In pursuance of Government of Khyber Pakhtunkhwa Home and T.As Department Notification No.SO(Prisons)-HD/8-6/2013/BC-1372-0 dated 11-6-2015, the following postings/transfers are hereby ordered in the public interest:-

- ✓ 1. Senior Clerk (BPS-14) Irfanullah attached to District Jail Timergara, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to District Jail/HSP Mardan against the existing vacancy.
- ✓ 2. Senior Clerk (BPS-14) Anayat-ur-Rehman attached to this office, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted in the same office against the existing vacancy.
- ✓ 3. Senior Clerk (BPS-14) Zahir Shah attached to District Jail Karak, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to District Jail/HSP Mardan against the existing vacancy.
- ① = 4. Senior Clerk (BPS-14) Abid Hussain attached to Central Prison D.I.Khan, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to Central Prison Bannu against the existing vacancy.
- ② = 5. Senior Clerk (BPS-14) Niaz Ali who is presently performing his duties at Judicial Lockup Swabi and for the purpose of pay attached to Borstal Institution Bannu, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to District Jail/HSP Mardan against the existing vacancy.
- ③ = 6. Senior Clerk (BPS-14) Raj Wali attached to Central Prison Peshawar, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to District Jail/HSP Mardan against the existing vacancy.
- ④ = 7. Senior Clerk (BPS-14) Muhammad Ali attached to District Jail Kohat, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to Prisons Inspectorate against the existing vacancy.
- ⑤ = 8. Senior Clerk (BPS-14) Abid Jamal attached to Central Prison Haripur, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted to District Jail/HSP Mardan against the existing vacancy.
- ⑥ = 9. Senior Clerk (BPS-14) Muhammad Javed attached to this office, on eve of his promotion to the post of Assistant (BPS-16) is hereby transferred and posted in the same office against the existing vacancy.

NOTE

- i. Arrival and departure reports should be sent to all concerned.
- ii. All should be relieved of their duties immediately by making local arrangement.
- iii. Minimum joining time may be allowed.

INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

Attested  
S. Khan  
Advocate

ENDST. NO. 17398-4161

Copy of the above is forwarded to :-

1. The Secretary to Government of Khyber Pakhtunkhwa Home and T.As Department Peshawar, for information with Home Department Notification referred to above.
2. The Accountant General Khyber Pakhtunkhwa Peshawar, for information.
3. The Superintendents, Central Prison Peshawar, Haripur, Bannu & D.I.Khan.
- ✓ 4. The Superintendent, Borstal Institution Bannu.
5. The Superintendent, DJ/HSP Mardan.
6. The Superintendents, District Jail Karak & Kohat.
7. The Incharge Internment Centre Kohat.
8. The Superintendent Judicial Lockup Swabi.
9. Office Accountant.
10. The District Accounts officers concerned for information.

9-B  
File

INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR



Annexure D

(27)

OFFICE OF THE  
INCHARGE INTERNMENT  
CENTER LAKKI MARWAT

NO. 454-WE

DATED 14-5-2015

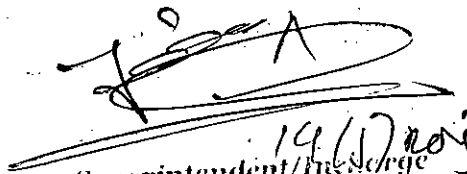
To

The Inspector General of Prisons  
Khyber Pakhtunkhwa Peshawar

subject:- APPEAL

Sir

An appeal presented by  
Imam Hussain Senior clerk temporary  
attached to this center is sent herewith  
for onward submission to the Court please.

  
Superintendent/Incharge  
Internment Center  
Lakki Marwat

14/5/2015

جناب۔ سیکرٹری صاحب، ہوم ڈیپارٹمنٹ پیرنٹنٹوٹوانہ آف ر

APPEAL

عنوان۔

توانہ انی کی پٹی پول صاحب جیل خانہ جات۔ پیرنٹنٹوٹوانہ آف ر  
فر 9765-WE حورف 14-4-2015

سٹل کے خلاف جناب۔ پرنٹنڈنٹ صاحب سٹریٹ  
جیل بنوں نے۔ سٹل کے سالنہ رپورٹ میں جو الزام لگائے ہیں  
انکے دفاع میں سٹل حسب ذیل عرض کرتا ہے۔

سٹل میں باہت محتصر عرض کرتا ہے۔ کہ جو الزام  
جناب۔ پرنٹنڈنٹ صاحب سٹریٹ جیل بنوں نے سٹل کے PER 2014  
میں لگائے ہیں یہی طرح ریگڈس اسی آفسر نے سالنہ رپورٹ  
2013 میں بھی لگائے تھے۔

چونکہ سٹل کے خلاف اسی آفسر نے 2013 میں  
انکوٹری رپورٹ آئی۔ جی صاحب کو بھیجی تھی۔ اور اس طرح کے ریگڈس  
انکا حق بھی بنتا تھا۔

چونکہ سٹل کے خلاف جو الزام PER 2013 میں لگائے تھے  
جناب۔ ہوم سیکرٹری صاحب کو اپیل کرنے PERSONAL HEARING کے لئے  
موجودہ آئی جی صاحب کو پیش ہوا تھا۔ اور خقائق زبانی بیان کرنے کے لئے  
سٹل کے خلاف PER 2013 کے الزام ختم کئے۔ اور سٹل کا PER 2013  
کلیر کیا۔

چونکہ سٹل کو PER 2014 بھی اسی آفسر نے دیا جو کہ وہی  
پرائی الزام کو دہرایا گیا ہے۔

چونکہ PER 2014 کے الزام وہی پرائی ہے بنیاد انکوٹری

Attested  
Sikhai  
Advocate

پہلے سے ہیں جو کہ سر اسٹراٹھی ہے۔ اور کسی ریکڈ جرم  
میں ریکڈ بار سزا دیا جاتا ہے۔ بار بار نہیں دیا جاتا  
لیکن سز کو وہ آفسر نے یہی جرم میں سائل کو دوبارہ  
سزا دیا ہے۔

لہذا سائل سمجھو انہ در خواست کرتا ہے۔

کہ سائل کے خلاف جھوٹے بیانی باروغ۔ لغض و عناد کی

وجہ سے جو ریپورٹس دئے ہیں ان سے سائل کو بری

کیا جائے۔ تاکہ سائل کے پلر موشن پلر اثر نہ پڑے جبکہ

وجہ سے سائل گریڈ 14 سے گریڈ 16 کے پلر موشن سے رہ جائے گا۔

سائل کو زانی مشورائی کا موقع دیا جائے۔

العقد حق

Imam Hussain  
14-5-2015

امام حسین کیرٹک عارفی لفیہائی انٹرنیٹ سٹڈی سروس

Attested  
Suhail  
Advocate

To

The Honourable Inspector General of  
Prisons, Khyber Pakhtunkhwa, Peshawar.

Subject:

REQUEST REGARDING APPEAL FOR EXPANCHED OF ACR, 2014

R/Sir

The Honourable Special Secretary Home, Mr. Saraj Sahib was fixed my personal hearing on 7<sup>th</sup> August 2015 at 2:00pm. On 7-8-2015 regarding my appeal for expanding of ACR 2014 on the base of adverse report. The honourable special secretary home decided that comments from the honorable Inspector General of Prisons, K.P.K, Peshawar may be asked for this personal hearing.

Now I am requesting that:-

1. In the A.C.R 2014 was recorded "Adverse Report" by the Superintendent Central Jail Bannu. I am aged man i.e 59 years and 4 months. And 8 Months is remaining in my service for retirement. I was deferred in the recently Promotion Board by the Departmental Promotion committee about the ACR, 2014.
2. I was not issued / received any kinds of show cause notice during the year 2014 please.
3. There was no inquiry held against me in the year 2014.
4. I was not involved in the any case of escape of a jail.
5. I was not involved in any kind of case in the year 2014.

Being not involved in any cases I was given punishment. I was also differed from the promotion to the rank of Assistant / Head clerk. Which was my due rights. At last I am requesting that comments/ recommendation, regarding my Appeal for Ex punching of ACR-2014 my kindly be given in favor of my promotion please.

Thanking you once again.

Dated: 10-08-2015

Yours obedient servant

*Imam Hussain*  
IMAM AUSSAIN  
Senior Clerk

Attested  
*Sikhan*  
Advocate

31



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. 33689 WE 1.,

Dated 24-11-2015 1.,

To

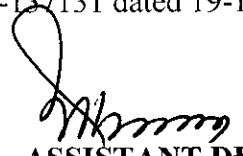
The Incharge,  
Internment Centre Lakki Marwat .

Subject:- APPEAL FOR EXPUNCTION OF ADVERSE REMARKS RECORDED IN THE P.E.R IN RESPECT OF MR.IMAM HUSSAIN SENIOR CLERK FOR THE YEAR 2014

Memo:

I am directed to refer to your endst; No.418-WE dated 27-4-2015 on the subject and to convey that the Appellate Authority has accepted the appeal of Mr.Imam Hussain, Senior Clerk and expunged the adverse remarks recorded in his P.E.R for the year 2014 vide Home Department Notification No.SO(PRISONS)/HD/P-F/1-12/2015/BC-137131 dated 19-11-2015 (copy enclosed).

Please inform him accordingly.

  
ASSISTANT DIRECTOR(ADMN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.



GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HOME & TRIBAL AFFAIRS DEPARTMENT.

Dated Peshawar 19<sup>th</sup> November, 2015.

11/20/15

NOTIFICATION.

**NO. SO(PRISONS)HD/P-F/1-12/2015/BC-137131:** In exercise of the powers conferred under Rule-6.6 (ii) of the Instructions on Performance Evaluation Report, the Competent Authority has been pleased to expunge the adverse remarks recorded in the P.E.R of Mr. Imam Hussain, Senior Clerk, Inspectorate of Prisons for the year 2014. Necessary entries shall be given in average category in the general assessment as per instructions contained in the rule *ibid*.

Secretary to Government of Khyber Pakhtunkhwa,  
Home & Tribal Affairs Department.

Copy to: -

- ✓ 1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for necessary action as requirement under Rule 6.6(ii) of Instruc: on Perform: Evalu: Report..
- 2. PS to Secretary Home, Khyber Pakhtunkhwa.
- 3. PS to Special Secretary Home, Khyber Pakhtunkhwa.
- 4. Official/Officer concerned.
- 5. Master File/Office Order File.

Section Officer (Prisons)

AIG  
20/11



Attested  
S. Khan  
Advocate

Annexure E

33

OFFICE OF THE  
SUPERINTENDENT  
INTERMENT CENTRE LAKKI  
MARWAT  
NO. 306/WE DATED 30/11/2015

To:



The Inspector General of Prison,  
Khyber Pakhtunkhwa Peshawar

Subject: PROMOTION

Memo

Please Referre to your good self memo number 33689-WE dated 24  
November 2015.

It is submitted for your kind information that an application presented by Mr.  
Imam Hussain, senior clerk attached with this internment centre Lakki Marwat  
alongwith its encluser are enclosed herewith for your kind perusal and favourable  
action and with the request for onward submission to the honourable Home  
Secretary Khyber Pakhtunkhwa Peshawar for his kind information and necessary  
action, please.

 SUPERINTENDENT/INCHARGE  
INTERMENT CENTRE  
LAKKI MARWAT  


To: The Honorable Home Secretary  
Government of Khyber Pakhtunkhwa Peshawar

34

Through The Worthy Inspector General of Prison,  
Khyber Pakhtunkhwa Peshawar

Subject: PROMOTION

Respected Sir,

It is submitted that I have been serving as senior clerk in BPS-14 in the prison department. On seniority I was at serial number 6 of the seniority list (copy attached). Meanwhile, some adverse remarks were recorded in the P.E.R-2014. On appeal my adverse remarks were expunged vide Government of Khyber Pakhtunkhwa Home and triable affair department S.O prison notification number SO(PRISIONS)HD/P-F/1-12/2015/BC-137131 dated 19 November 2015 (copy attached).

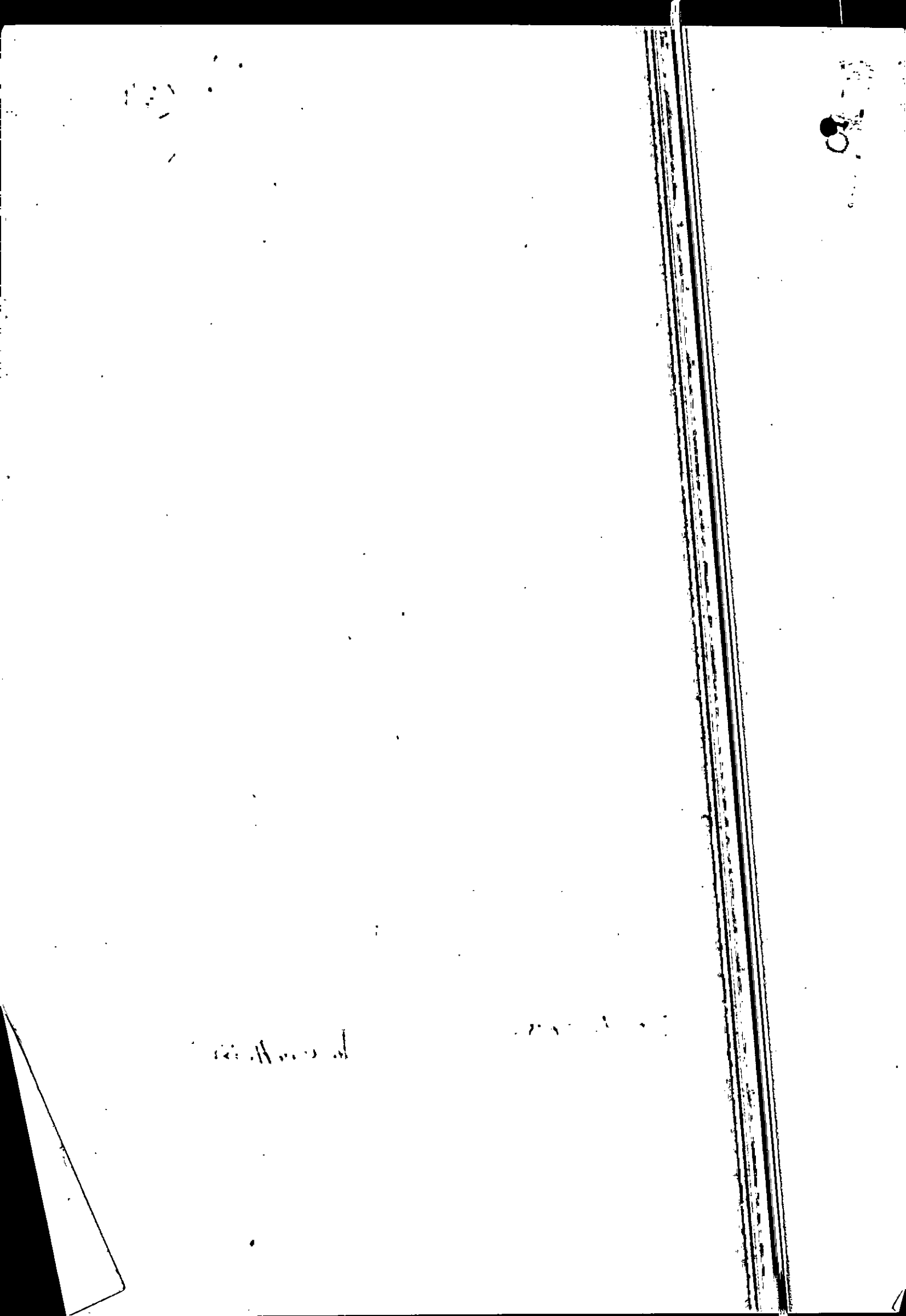
During this my senior clerks in BPS-14 have been promoted to the next grade BPS-16 (Office Assisitant / Head Clerk). It is therefore, requested that after correction on my P.E.R-2014 I may please be promoted to the next grade BPS-16 (Office Assistant / Head Clerk) with the : BACK SENIORITY AND WITH ALL THE FULL BENEFITS WITH THE BACK DATE I.E DATE OF PROMOTION OF THE SENIOR CLERKS BPS-14 TO THE NEXT GRADE BPS-16 (OFFICE ASSISTANT / HEAD CLERK).

I SHALL PRAY FOR YOU AND YOUR FAMILY.

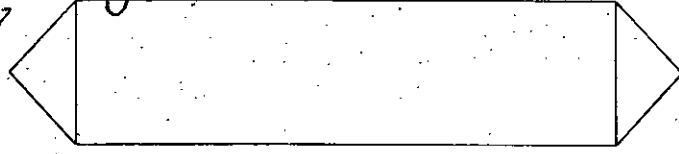
Dated: 30-11-2015.

Your Obedient Servent  
*Imam Hussain*  
(Imam Hussain)  
Senior Clerk attached with  
Internment centre Lakki Marwat





بعدالت جدہ سرسبز پریسوں پر KPK سٹیمپ



سائنل  
گورنمنٹ KPK

2016ء پنجاب

احصاء حسین بنام

مورخہ

مقدمہ

دعویٰ

جرم

## باعث تحریر آنکد

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام لیت و ر کیلئے راجہ محمد اعجاز، ہمایوں خان، آخر پریس، اہل کتب

مقرر 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 ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ 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 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

ed by

MAN AFRIDI

2016ء

مارچ

ماہ

25

المرقوم

العبد العبد العبد

کے لئے منظور ہے۔

محمد

سٹیمپ

مقام

Accepted

NASIR K

*Signature*

*Signature*

22 مارچ  
پبلشرز  
193 یو این ایف او  
No: 0345-9223

Form 'G' (Revised)  
Assistant and Clerks

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 01-01-2013 to 31-12-2014

PART-I

1. Name Imran Habib
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 25-06-1990
5. Branches in which employed during the year, with period Pay Branch etc

PART-II

A. PERFORMANCE		AI	A	B	C	D
1.	Referencing, paging of notes and correspondence			<u>B</u>		
2.	Movement of Files and record of suspense cases.			<u>B</u>		
3.	Keeping files and Papers tidy condition			<u>B</u>		
4.	Promptness and accuracy in disposing			<u>B</u>		
B. PERSONAL TRAITS						
5.	Intelligence.			<u>B</u>		
6.	Knowledge of Procedures and Regulations.			<u>B</u>		
7.	Punctuality			<u>B</u>		
8.	Cooperation and Tact.			<u>B</u>		
9.	Amenability to Discipline			<u>B</u>		
10.	Skill in Drafting.			<u>B</u>		

11. Integrity
  - i). Incorruptible
  - ii). Reported to be corrupt
  - iii). Believed to be corrupt, because of
    - a. Monetary Consideration
    - b. Other Considerations

Assessment

Corrupt

Corrupt  
Monetary

Yes

No

Reported to be corrupt, because of

No

a. Monetary Consideration

No

b. Other Considerations

No

- 12. Knowledge of Typing \_\_\_\_\_
- 13. Trust Worthiness in confinement and secret matters. \_\_\_\_\_
- 14. Any Disciplinary action taken during the period of under report. \_\_\_\_\_

**PART-III**

	By Reporting Officer.	By Countersigning Officer.
a. Recommended for acceleration promotion	_____	_____
b. Fit for promotion	_____	_____
c. Recently promoted / appointed consideration for promotion pre-mature	_____	_____
d. Not yet fit for promotion.	_____	_____
e. Unfit for further promotion.	_____	_____

**PART-IV**

General Assessment:

	By Reporting Officer	By Countersigning Officer
i. Very good	_____	_____
ii. Good	_____	_____
iii. Average	_____	_____
iv. Below Average	_____	_____
v. Poor	_____	_____

PEN PICTURE

\_\_\_\_\_ *An interesting & worthy official* \_\_\_\_\_

Reporting Officer's Signature \_\_\_\_\_

Name (in Block Letters) SHIBZADA SHAH JEWAL

Dated \_\_\_\_\_

15/12/2015

Signature Supervisor C of Banaru

**GENERAL REMARKS BY HIGHER OFFICER**

Countersigning Officer's Signature \_\_\_\_\_

Name (In Block Letters) KIFAYATULLAH KHAN

Designation FC

*Attested*  
 \_\_\_\_\_  
 ASSISTANT DIRECTOR (ADMIN)  
 For Inspector General of Prisons  
 Khyber Pakhtunkhwa Peshawar

22.3.15

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

In the matter of  
Service Appeal No.311/2016  
Imam Hussain Ex-Senior Clerk  
Attached to Internment Center Lakki Marwat.....**Appellant.**

**VERSUS**

1. Chief Secretary,  
Khyber Pakhtunkhwa.
2. Inspector General of Prisons,  
Khyber Pakhtunkhwa Peshawar.
3. Secretary to Government of Khyber Pakhtunkhwa,  
Home and T.As Department.
4. Superintendent  
Incharge, Internment Center Lakki Marwat.....**Respondents.**

**PARAWISE REPLY ON BEHALF OF RESPONDENTS No. 1 to 4.**

**Preliminary Objections**

- i. That the appellant has got no cause of action.
- ii. That the appeal is incompetent and is not maintainable in its present form.
- iii. That the appellant is estopped by his own conduct to bring the present appeal.
- iv. That the appellant has no locus standi.
- v. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- vi. That the appeal is barred by law.
- vii. That this Honorable Tribunal has no jurisdiction to entertain the appeal.

**ON FACTS**

- 1- Pertains to record.
- 2- Pertains to record.
- 3- The promotion case of Senior Clerks including the Petitioner was placed before the Departmental Promotion Committee (DPC) and as recommended by the committee and approved by the authority the

promotion orders of the suitable candidates were notified accordingly and the Petitioner was superseded due to adverse entry in his service record. Later on, he filed appeal which was considered and filed by the appellate authority (Home Secretary). No departmental appeal was filed by the appellant against his supersession.


- 4- Admitted to the extent that adverse remarks were recorded in his P.E.Rs for the year 2014 which were accordingly communicated to him and upon appeal the said adverse remarks were expunged by the appellate authority (Home Secretary) in the month of November 2015 whereas the promotion was ordered in the month of June 2015 which is earlier from his expungement date. However, the appellate authority rejected his appeal for setting aside the penalty of withholding of increment for one year awarded to him in a departmental case of misappropriation in the Store articles as he, while posted at Central Prison Bannu on 19-12-2013 at 04:00 PM, was caught red handed by Superintendent Jail concerned while taking away 14 Kg Rice from Jail Store. Copy of rejected appeal is enclosed for perusal please.
- 5- As explained in Para-3 above, his appeal was badly time barred.

**GROUND:** -

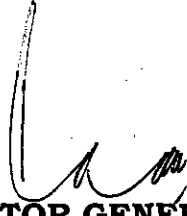
- A. Not admitted, as explained in the preceding Paras.
- B. Not admitted, applicant was considered. However, superseded.
- C. His service career was not spotless as explained in Para-4 above, hence he was not considered suitable for promotion to the post of Assistant (BPS-16) by the committee concerned and according to Section-22 of Civil Servants Act-1973, the decision of the committee cannot be challenged.
- D. Not admitted. The act of Respondents are in accordance with law.
- E. Not admitted, as no discriminations treatment was made with the appellant and the committees decision was strictly in accordance with the rules.

F. Respondents also seek permission to adduce further ground during argument..


It is therefore, humbly prayed that on acceptance of this reply, *the* instant appeal may kindly be dismissed with cost throughout.

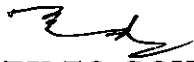


**CHIEF SECRETARY**  
Khyber Pakhtunkhwa  
(Respondent No.1)

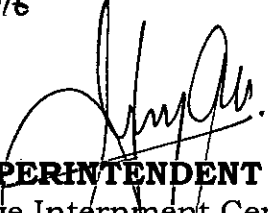


**INSPECTOR GENERAL OF PRISONS**  
Khyber Pakhtunkhwa Peshawar  
(Respondent No.2)

  
5/8/16



**SECRETARY TO GOVERNMENT**  
Of Khyber Pakhtunkhwa,  
Home and T.As Department  
(Respondent No.3)



**SUPERINTENDENT**  
Incharge Internment Center  
Lakki Marwat  
(Respondent No.4)



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


In the matter of  
Service Appeal No.311/2016  
Imam Hussain Ex-Senior Clerk  
Attached to Internment Center Lakki Marwat.....**Appellant.**

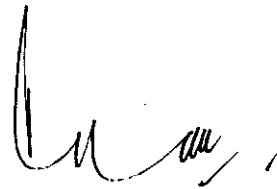
**VERSUS**


1. Chief Secretary,  
Khyber Pakhtunkhwa.
2. Inspector General of Prisons,  
Khyber Pakhtunkhwa Peshawar.
3. Secretary to Government of Khyber Pakhtunkhwa,  
Home and T.As Department.
4. Superintendent  
Incharge, Internment Center Lakki Marwat.....**Respondents.**

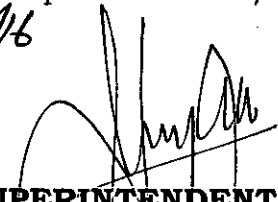
**PARAWISE REPLY ON BEHALF OF RESPONDENTS No. 1 to 4.**

We the undersigned respondents do hereby solemnly affirm and declare that the contents of the Para-wise comments on the above cited appeal are true and correct to the best of our knowledge and belief and that no material facts have been kept secret from this Honorable Tribunal.

  
**CHIEF SECRETARY**  
Khyber Pakhtunkhwa  
(Respondent No.1)

  
**INSPECTOR GENERAL OF PRISONS**  
Khyber Pakhtunkhwa Peshawar  
(Respondent No.2)

  
**SECRETARY TO GOVERNMENT**  
Of Khyber Pakhtunkhwa,  
Home and T.As Department  
(Respondent No.3)

  
**✓SUPERINTENDENT**  
Incharge Internment Center  
Lakki Marwat  
(Respondent No.4)



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA  
PESHAWAR

091-9210334, 9210406 091-9213445

No. 18515 1-WE

Dated 07-07-2014

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Home and T.As Department,  
Peshawar.

Subject:- DEPARTMENTAL APPEAL  
Memo:

I am directed to refer to the subject and to convey that Superintendent Central Prison Bannu had reported vide his letter No.14-WE dated 21-12-2013 (copy enclosed) that on 19-12-2013 4.00 PM Mr.Imam Hussain Senior Clerk (BPS-9) posted in his jail was caught red handed by him while taking away (14 KG) Rice from the jail store. He requested for his suspension with immediate effect with initiation departmental proceedings under the rules. Accordingly he was placed under suspension vide this office order No.269 dated 01-1-2014 (copy enclosed) and departmental proceeding was also initiated against him and for conducting formal inquiry in the case Mr.Amin-ul-Haq, Senior Assistant Superintendent Jail Karak has been appointed as Inquiry Officer vide this office order No.273-75 dated 01-1-2014 (copy enclosed).

The Inquiry officer concerned submitted his findings vide letter No.237 dated 27-2-2014 (copy enclosed) according to which the charges stood proved against him. As required, final Show Cause Notice was served upon the above named official through Superintendent Central Prison Bannu vide this office letter No.7058-WE dated 19-3-2014 (copy enclosed). Accordingly he furnished his reply to the Show Cause Notice but the same were found un-satisfactory, however, before passing final orders, the opportunity of personal hearing was also afforded to him vide this office letter No.20/2-J-1990/12047 dated 8-5-2014 (copy enclosed).

As the charges stood proved against him, upon completion of procedural formalities, he was awarded the minor penalty of "withholding increment for one year" vide this office order No. 20/2-J-1990/13313 dated 20-5-2014 (copy enclosed)

Now feeling aggrieved with the above decision, he preferred his departmental appeal for setting aside the penalty awarded to him which is enclosed herewith in original.

As the department already dealt leniently and there is no solid grounds has been given by the appellant in his appeal, therefore, same may please be rejected..

Yours Obediently,

ASSISTANT DIRECTOR(ADMN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

NO. SO (PRISONS)/8-3/HD/BC-113969/2014/VOL-III  
Dated Peshawar the 15<sup>th</sup> April, 2015.

To

The Inspector General of Prisons,  
Khyber Pakhtunkhwa, Peshawar.



Subject: - DEPARTMENTAL APPEAL

PRISON DEPARTMENT	
Inspector General	
A.I.G.	
Admn. Officer	4

- P.S.T 16/15

Dear Sir,

I am directed to refer to your letter No. 5668-WE dated 06/03/2015 on the subject noted above and to state that after going through appeal of Mr. Imam Hussain, Senior Clerk the competent authority has directed to file the case. Therefore the appellant may please be informed accordingly.

Yours faithfully,

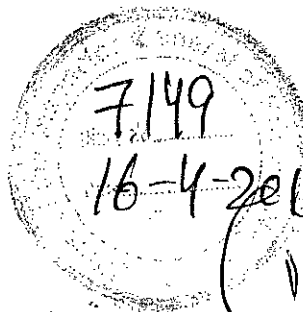
(Rahmat Ali Wazir)  
SECTION OFFICER (PRISONS)

Endst: of even No/date

Copy forwarded for information to the:

1. PS to Special Secretary Home Khyber Pakhtunkhwa Peshawar.
2. Master File.

SECTION OFFICER (PRISONS)



24/04/15

**BEFORE THE KHYBER PAKHTUNKHWA HON'BLE  
SERVICE TRIBUNAL PESHAWAR.**

*Appeal No.311/2016*

***Imam Hussain \*\*\* Versus\*\*\*\* Govt of KPK &  
others.***

**Appellant's Rejoinder.**

*Respectfully Sheweth:*

**Preliminary Objections:**

*That all the objections raised by the respondents are incorrect and are not sustainable, hence denied, vehemently.*

**Facts:**

*1,2) In reply of the Paras No.1 and 2 of the respondents , it is submitted that Para No.1 and 2 of the appeal of appellant are correct.*

*3) That Para No.3 of the comments is denied, on appeal of the appellant the adverse remarks has been expunged and after that the appellant has the right of promotion.*

*4) Para No.4 of the comments is denied, all the allegations' against the appellant and the adverse remarks in the P.E.R of the appellant for the period from 18/08/2013 to 31/12/2013*

Office Order dated 22/12/2014 Order No.SO(PRISONS)/8-3/HD/BC-113969/ 2014/ Vol: III has been expunged and the adverse remarks of the appellant for the year 2014 has also been expunged through Notification No.SO/ (PRISONS)/HD/P-F/1-12/2015/BC-137131 dated 19/09/2015. (Copies of the above mentioned order are annexed herewith)

5) Para No.5 is denied, the appeal is filed by the appellant within time

**Grounds:**

A to B- Incorrect. Grounds A to B of appeal are correct and its replies are incorrect.


C-Incorrect. The appellant has performed his duties according to law and appellant annual confidential reports were marked very good on yearly basis. (Report is already annexed with the appeal, hence Para C of the grounds of the reply of respondents is incorrect while para C of the appeal of the appellant is correct.

D&E- Incorrect. Grounds D and E of appeal are correct and its replies are incorrect.

F- That the appellant will submit additional grounds at the time of arguments.

It is, Therefore, prayed that on acceptance of appeal and rejoinder of the appellant, the Hon'ble Service Tribunal may graciously be declare the appellant senior to the respondents No.5 to 10 and appellant be promoted being Senior and deserving with all back benefit from the date i.e. 11/06/2015 vide Home Department (SO)(Prisons)/HD/8-6/2013/BC -137240 of promotions.

Dated 31/05/2017

Appellant  
Through   
Nasir Khan Afridi  
Advocate, Peshawar.

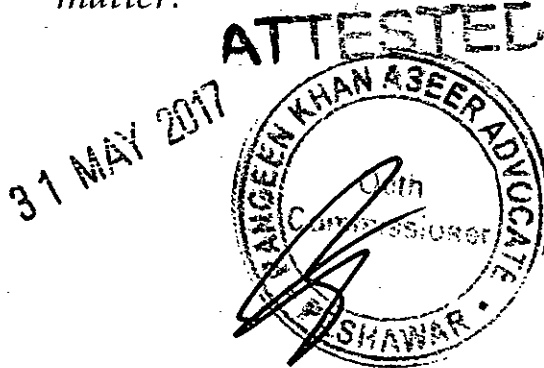
BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.

Appeal No.311/2016

**Imam Hussain \*\*\* Versus\*\*\*\* Govt of KPK &  
others.**

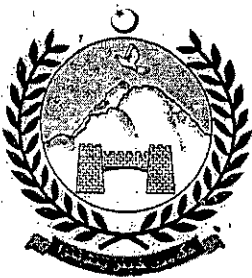
Affidavit

I, Imam Hussain, Senior Clerk BPS - 14 do hereby solemnly affirm and state on oath that all contents of appeal and rejoinder are true and correct to the best of my knowledge and belief and nothing wrong has been stated by me in the matter.



*Imam Hussain*  
DEPONENT

17301-1400317-3



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

PRISONS DEPARTMENT

**OFFICE ORDER** Inspector General

A.I.G.

Admn Officer

**NO. SO (PRISONS)/8-3/HD/BC-113969/2014/VOL-III:** The Competent Authority has been pleased to expunge the Adverse Remarks in the P.E.R of Mr. Imam Hussain Senior Clerk for the period from 18/08/2013 to 31/12/2013 on humanitarian grounds.

Sd

Special Secretary Home

Dated the 22<sup>nd</sup> December, 2014, Peshawar.

(REHMAT ALI WAZIR)  
SECTION OFFICER (PRISONS)  
GOVT OF KHYBER PAKHTUNKHWA

**NO. SO (PRISONS)/8-3/HD/BC-113969/2014/VOL-III:** - Dated the 22<sup>nd</sup> December, 2014, Peshawar.

A copy is forwarded for information and necessary action to: -

1. Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary Home, Khyber Pakhtunkhwa.
3. PS to Special Secretary Home, Khyber Pakhtunkhwa.
4. Official concerned.
5. Master file/Office Order file.

SECTION OFFICER (PRISONS)







GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HOME & TRIBAL AFFAIRS DEPARTMENT.

Dated Peshawar 19<sup>th</sup> November, 2015.

199  
M  
20/11

NOTIFICATION.

**NO. SO(PRISONS)HD/P-F/1-12/2015/BC-137131:** In exercise of the powers conferred under Rule-6.6 (ii) of the Instructions on Performance Evaluation Report, the Competent Authority has been pleased to expunge the adverse remarks recorded in the P.E.R of Mr. Imam Hussain, Senior Clerk, Inspectorate of Prisons for the year 2014. Necessary entries shall be given in average category in the general assessment as per instructions contained in the rule ibid.

Secretary to Government of Khyber Pakhtunkhwa,  
Home & Tribal Affairs Department.

Copy to: -

- ✓ 1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for necessary action as requirement under Rule 6.6(ii) of Instruc: on Perform: Evalu: Report..
2. PS to Secretary Home, Khyber Pakhtunkhwa.
3. PS to Special Secretary Home, Khyber Pakhtunkhwa.
4. Official/Officer concerned.
5. Master File/Office Order File.

Section Officer (Prisons)



AIG  
20/11



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

No.SO(Prisons)-HD/8-6/2013/ BC-137240. The Competent Authority in consultation with the Departmental Promotion Committee is pleased to order promotion of the following Senior Clerks (BPS-14) to the post of Assistant (BPS-16) on regular basis, with immediate effect:-

- 1- Mr. Irfanullah,
- 2- Mr. Anayat-ur-Rehman.
- 3- Mr. Zahir Shah.
- 4- Mr. Abid Hussain.
- 5- Mr. Niaz Ali.
- 6- Mr. Raj Wali.
- 7- Mr. Muhammad Ali.
- 8- Mr. Abid Jamal.
- 9- Mr. Muhammad Javed.
- 10- Mr. Sajid Ali.

The officers from S.No.1 to 10 above will be on probation for a period of one year in terms of Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules-1989 and Section 6 (2) of Khyber Pakhtunkhwa Civil Servant Act 1973.

Their services are hereby placed at the disposal of Inspector General of Prisons Khyber Pakhtunkhwa for their further posting.

Secretary to Government of  
Khyber Pakhtunkhwa Home & T.As  
Department Peshawar

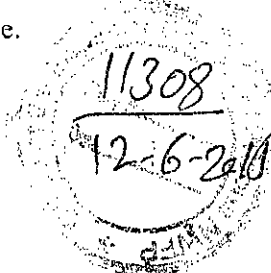
Dated the, 11<sup>th</sup> June, 2015, Peshawar.

(Rehmat Ali Wazir)  
SECTION OFFICER (PRISONS)

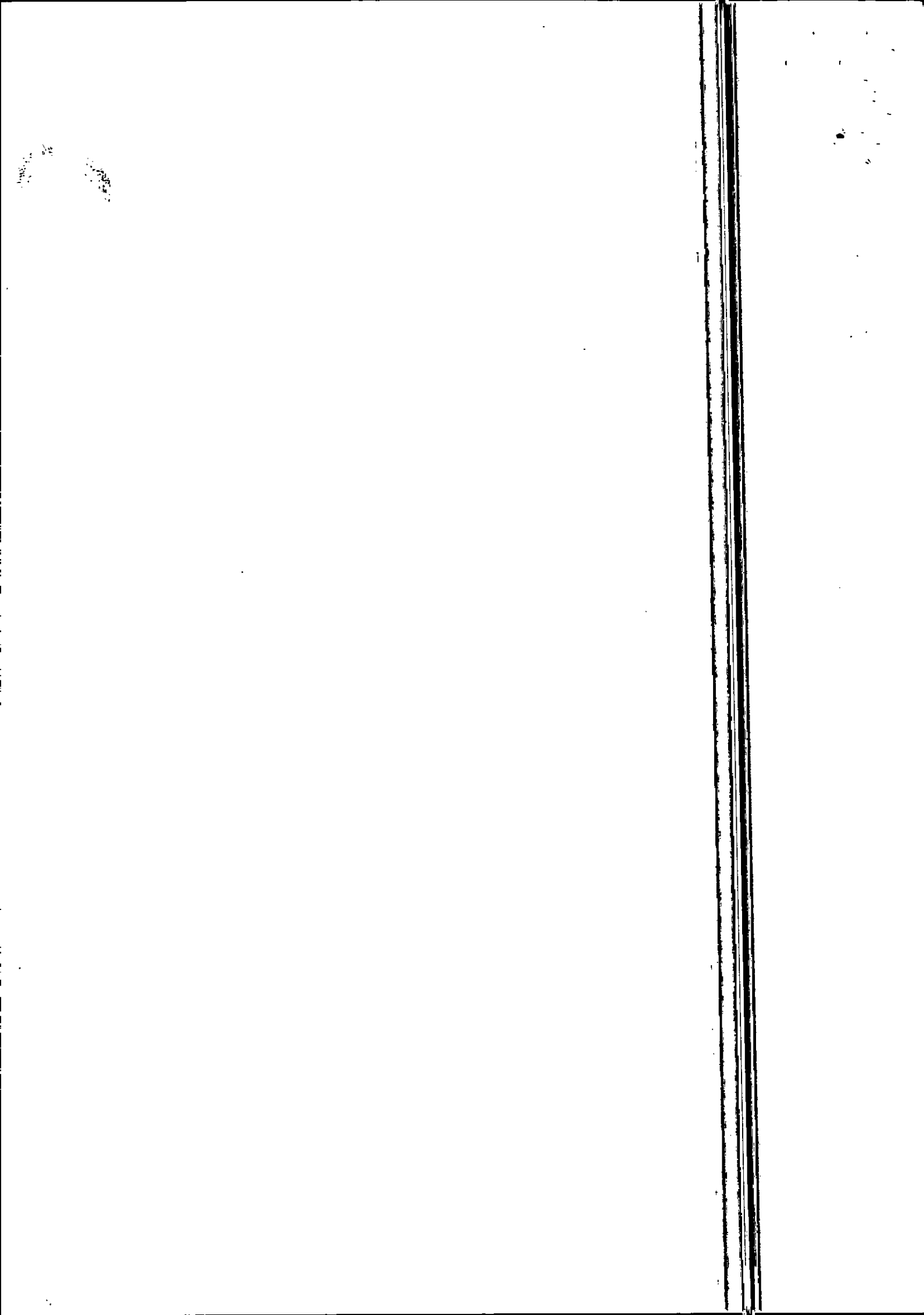
No.SO(Prisons)-HD/8-6/2013/ BC-137240.- Dated the, 11<sup>th</sup> June, 2015, Peshawar.

A copy is forwarded for information and necessary action to: -

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar, for information and necessary action.
3. Director IT, Home & TAs Department, Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary Home, Khyber Pakhtunkhwa.
5. PS to Special Secretary Home, Khyber Pakhtunkhwa.
6. Officer Concerned.
7. Master file/Office Order file.



SECTION OFFICER (PRISONS)



Form 'G' (Revised)  
Assistant and Clerks

GOVERNMENT OF PUNJAB  
PRISON DEPARTMENT

CONFIDENTIAL REPORT

For the period from 02-02-2015 to 23-06-2015.

PART-I

1. Name Mr. Hussain
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 24-06-1990
5. Branches in which employed during the year, with period, pay and Allowances, Msk E To.

PART-II

A. PERFORMANCE		AI	A	B	C	D
1.	Referencing, paging of notes and correspondence	§				
2.	Movement of files and record of suspense cases.	§				
3.	Keeping files and Papers tidy condition	§				
4.	Promptness and accuracy in disposing	§				
B. PERSONAL TRAITS						
5.	Intelligence.		§			
6.	Knowledge of Procedures and Regulations.		§			
7.	Punctuality		§			
8.	Cooperation and Tact.	§				
9.	Amenability to Discipline	§				
10.	Skill in Drafting.		§			

11. Integrity

Assessment

- i). Incorruptible Not Corrupt
- ii). Reported to be corrupt No
- iii). Believed to be corrupt, because
  - a. Monetary Consideration No
  - b. Other Considerations No

- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
|  | Yes                                 | No                                  |
| 12. Knowledge of Typing  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 13. Trust Worthiness in confinement and secret matters.              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 14. Any Disciplinary action taken during the period of under report. | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

By \_\_\_\_\_

**PART-III**

	Reporting Officer	Countersigning Officer
a. Recommended for acceleration promotion	_____	_____
b. Fit for promotion	<i>Fit for promotion</i>	_____
c. Recently promoted / appointed consideration for promotion pre-mature	_____	_____
d. Not yet fit for promotion.	_____	_____
e. Unfit for further promotion.	_____	_____

**PART-IV**

General Assessment

	By Reporting Officer	By Countersigning Officer
i. Very good	<i>Very good</i>	_____
ii. Good	_____	_____
iii. Average	_____	_____
iv. Below Average	_____	_____
Poor	_____	_____

*He is hard worker knowing his job and fit for promotion on his terms.*

Reporting Officer's Signature \_\_\_\_\_  
 Name (in Block Letters) *SABZ ALI*  
 Designation *Sy. Assistant Superintendent Jail.*

Dated \_\_\_\_\_

GENERAL REMARKS BY HIGHER OFFICER

Countersigning Officer's Signature \_\_\_\_\_  
 Name (in Block Letters) \_\_\_\_\_  
 Designation \_\_\_\_\_

Form "G" (Revised)  
Assistant and Clerks

# GOVERNMENT OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT

## CONFIDENTIAL REPORT

For the period from 08-03-2013 to 02-08-2013

PART-I

1. Name Imam Hussain
2. Designation Deputy Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 24-06-1990
5. Branches in which employed during the period with period Pay and Allowances

PART-II

A. PERFORMANCE		AI	A	B	C	D
1.	Referencing, paging of notes and correspondence					
2.	Movement of Files and record of suspense cases.					
3.	Keeping files and Papers tidy condition					
4.	Promptness and accuracy in disposing					
B. PERSONAL TRAITS						
5.	Intelligence.					
6.	Knowledge of Procedures and Regulations.					
7.	Punctuality					
8.	Cooperation and Fact.					
9.	Amenability to Discipline					
10.	Skill in Drafting.					

11. Integrity

Assessment

- i). Incorruptible
- ii). Reported to be corrupt
- iii). Believed to be corrupt, because of:
  - a. Monetary Consideration
  - b. Other Considerations

- NOT CORRUPT -  
- NO -  
- NO -  
- NO -  
- NO -

- 12. Knowledge of Typing
- 13. Trust Worthiness in confinement and matters.
- 14. Any Disciplinary action taken during period of under report.

Yes                      No

YES                      \_\_\_\_\_

By \_\_\_\_\_ By \_\_\_\_\_

- a. Recommended for acceleration promotion
- b. Fit for promotion
- c. Recently promoted / appointed consideration for promotion pre-mature
- d. Not yet fit for promotion.
- e. Unfit for further promotion.

M. Hussain Khan

Reporting Officer: \_\_\_\_\_  
Countersigning Officer: \_\_\_\_\_

**PART-IV**

General Assessment

- i. Very good
- ii. Good
- iii. Average
- iv. Below Average
- v. Poor

ii

By Reporting Officer: \_\_\_\_\_  
By Countersigning Officer: \_\_\_\_\_

He is hard worker, efficient and professional in his job and work. Fit for promotion.

PEN PICTURE

Reporting Officer's Signature: [Signature]  
Name (in Block Letters): EMRAN KHAN  
Designation: Sub-Inspector  
OTHER OFFICER: \_\_\_\_\_

Dated: \_\_\_\_\_  
GENERAL REMARKS: Seen

Countersigning Officer's Signature: [Signature]  
Name (in Block Letters): KHALID ABBAS  
Designation: The then I.C. Prisons KPR

GOVERNMENT OF PUNJAB  
PRISON DEPARTMENT  
CYBER PAKHTUNKHWA

CONFIDENTIAL REPORT

For the period from 24-6-2015 to 31-12-2015

PART-I

1. Name Jalal Hussaini
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 24-06-1990
5. Branches in which employed during the year, with period Allowance and Mele Payment

PART-II

A. PERFORMANCE

	AI	A	B	C	D
1. Referencing, paging of notes and correspondence	✓				
2. Movement of Files and record of suspense cases.		✓			
3. Keeping files and Papers tidy condition	✓	✓			
4. Promptness and accuracy in disposing	✓	✓			
B. PERSONAL TRAITS					
5. Intelligence.	✓	✓			
6. Knowledge of Procedures and Regulations.	✓	✓			
7. Punctuality	✓	✓			
8. Cooperation and Tact.	✓	✓			
9. Amenability to Discipline	✓	✓			
10. Skill in Drafting.	✓	✓			

ii. Integrity

- i). Incorruptible
- ii). Reported to be corrupt
- iii). Believed to be corrupt, because of
  - a. Monetary Consideration
  - b. Other Considerations

Assessment

NOT CORRUPT - ✓  
 - NO - ✓  
 - NO - ✓  
 - NO - ✓  
 - NO - ✓



- |   |       |   |
|---|-------|---|
|   | Yes   | N |
| 12. Knowledge of Typing                                   | YES ✓ |   |
| 13. Frust Worthiness in confinement and matters.          | YES ✓ |   |
| 14. Any Disciplinary action taken during of under report. | - ✓   |   |

By \_\_\_\_\_

- |   | Reporting Officer | Countersigning Officer |
|---|-------------------|------------------------|
| a. Recommended for acceleration promotion                               | YES ✓             |                        |
| b. Fit for promotion  | YES ✓             |                        |
| c. Recently promoted / appointed consideration for promotion pre-mature | - ✓               |                        |
| d. Not fit for promotion.   | NO ✓              |                        |
| e. Unfit for further promotion.   | NO ✓              |                        |

**PART-IV**

- | General Assessment | By Reporting Officer | By Countersigning Officer |
|--------------------|----------------------|---------------------------|
| i. Very good       | VERY GOOD ✓          |                           |
| ii. Good           | - ✓                  |                           |
| iii. Average       | - ✓                  |                           |
| iv. Below Average  | - ✓                  |                           |
| v. Poor            | - ✓                  |                           |

PEN PICTURE

He is hardworking, efficient and professional in his job and work. Fit for promotion ✓

Reporting Officer's Signature \_\_\_\_\_

Name (in Block Letters) SYED MOHYUDDIN

Dated \_\_\_\_\_

CHARGE INTERMENT CENTER

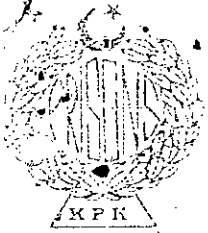
GENERAL RECOMMENDATION OFFICER Superintendent/Incharge  
Interment Center  
Lakki Marwal

Countersigning Officer's Signature \_\_\_\_\_

Name (in Block Letters) \_\_\_\_\_

Designation \_\_\_\_\_

LAKKI MARWAL



OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. 8/24-J-209/13246

DATED 20-05-2014

NOTIFICATION

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, Final Seniority list of Senior Clerks (BPS-09) as it stood on 01-4-2014 is notified/circulated:-

S#	NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT.	DATE OF 1 <sup>ST</sup> ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION			PRESENT APPOINTMENT	REMARKS
				DATE	BPS	METHOD OF APPOINTMENT.		
1.	Mr. Irfanullah (B.A)	01-11-1959 (Charsadda)	02-03-1986	14-10-2005	9	By promotion	Senior Clerk.	Seniority maintained as in lower scale.
2.	Mr. Prain (D.Com)	25-04-1965 (Peshawar)	01-11-1987	01-11-2005	9	-do-	Senior Clerk.	-do-
3.	Mr. Akhtar Shah (F.A)	11-04-1967 (Peshawar)	Warder 03-05-1986 J/Clerk 02-10-1988.	14-10-2005	9	-do-	Senior Clerk.	-do-
4.	Mr. Anayat-ur-Rehman (F.A)	24-11-1964 (Abbottabad)	Warder 24-04-1987 J/Clerk 27-1-1990.	01-11-2005	9	-do-	Senior Clerk.	-do-
5.	Mr. Zahir Shah (Matric)	15-02-1968 (Charsadda)	31-05-1990	7-11-2005	9	-do-	Senior Clerk.	-do-
6.	Mr. Inam Hussain (F.A) <i>60/03</i>	15-04-1956 (Kohat)	25-06-1990	7-11-2005	9	-do-	Senior Clerk	-do-
7.	Mr. Abid Hussein (D.Com)	05-01-1967 (D.I.Khan) $\Delta$	29-09-1990	04-08-2006	9	-do-	Senior Clerk.	-do-
8.	Mr. Niaz Ali (FA)	10-04-1968 (Charsadda)	17-11-1990	19-07-2006	9	-do-	Senior Clerk.	-do-
9.	Mr. Raj Wali (B.A)	20-02-1969 (Mohmand Agency)	24-11-1990	24-08-2006	9	-do-	Senior Clerk.	-do-
10.	Mr. Muhammad Ali (M.A)	14-11-1957 (Mohmand Agency)	06-08-1986	1-9-2008	9	-do-	Senior Clerk.	-do-
11.	Mr. Ali Haider (B.A)	3-12-1961 (Peshawar)	20-4-1987	1-9-2008	9	-do-	Senior Clerk.	-do-
12.	Mr. Abid Jamal (D.Com)	12-04-1967 (Peshawar)	05-08-1991	17-9-2008	9	-do-	Senior Clerk.	-do-
13.	Mr. Muhammad Latif Khan (Matric)	07-02-1965 (Bannu)	19-09-1991	1-10-2008	9	-do-	Senior Clerk.	-do-



P-2

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. \_\_\_\_\_

DATED 20-05-2014

14.	Mr. Muhammad Javed	(F.A)	14-10-1973 (Charsadda)	26-09-1992	28-2-2009	9	-do-	Senior Clerk.	-do-
15.	Mr. Sajid Ali	(F.A)	01-01-1974 (Peshawar)	Warder 24-08-1991 J/Clerk 06-4-1993	10-02-2009	9	-do-	Senior Clerk.	-do-
16.	Mr. Khadim Shah	(M.A)	16-04-1969 (Charsadda)	26-09-1993	08-9-2010	9	-do-	Senior Clerk.	-do-
17.	Mr. Muhammad Yar	(Matric)	01-12-1964 (Dir Lower)	Warder 27-04-1982 J/Clerk 01-5-1993	22-11-2011	9	-do-	Senior Clerk.	-do-
18.	Mr. Muhammad Jehangir	(B.A)	15-11-1972 (Mohmand Agency)	05-12-1997	01-12-2011	9	-do-	Senior Clerk.	-do-
19.	Mr. Yousaf Khan	(B.A)	18-07-1972 (Khyber Agency)	10-12-1997	22-11-2011	9	-do-	Senior Clerk.	-do-
20.	Mr. Asif Shah.	(B.A)	02-04-1978 (Haripur)	12-12-1997	22-11-2011	9	-do-	Senior Clerk.	-do-
21.	Syed Rahim Shah	(B.A)	15-04-1974 (Swat)	13-12-1997	27-2-2013	9	-do-	Senior Clerk.	-do-
22.	Mr. Sardar Ali	(F.A)	11-11-1972 (Peshawar)	3-7-1993	28-2-2013	9	-do-	Senior Clerk.	-do-
23.	Mr. Muhammad Saeed	(B.A)	10-4-1974 (Khyber Agency)	1-8-1995	27-2-2013	9	-do-	Senior Clerk.	-do-
24.	Mr. Muhammad Atif Nawaz Qureshi	(F.A)	8-8-1975 (D.I.Khan)	Warder 01-10-1997 J/Clerk 23-6-2004	4-3-2013	9	-do-	Senior Clerk.	-do-
25.	Mr. Atiqur ur Rehman	(M.A)	10-5-1977 (D.I.Khan)	Warder 08-5-1999 J/Clerk 23-6-2004	27-2-2013	9	-do-	Senior Clerk.	-do-
26.	Mr. Abdul Hamid Abbasi	(B.A)	4-4-1975 (Abbottabad)	Warder 03-10-1997 J/Clerk 05-7-2004	19-12-2013	9	-do-	Senior Clerk.	-do-
27.	Mueed Rashid	(BA/LLB/DIT)	15-3-1983 (Lakki Marwat)	5-11-2004	19-12-2013	9	-do-	Senior Clerk	-do-

1107  
26-5-2014

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.



8-3-

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. \_\_\_\_\_

DATED 20-05-2014

ENDST;NO. 13247-72 /,

Copy of the above is forwarded to :-

1. All Superintendents of Jails /Lockups/Internment Centres.
2. Office Accountant/.

For information of the officials concerned.

ASSISTANT DIRECTOR(ADMN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

بحضور جناب ولاشان سروسز ٹریبونل خیبر پختونخواہ پشاور

پرسنل ہائرنگ

امام حسین بنام جناب چیف سیکرٹری صاحب وغیرہ

جناب عالی

مٹودبانہ التماس کی جاتی ہے کہ من سائل مسٹر امام حسین سنئر کلرک BPS14 مورخہ 14 اپریل

2016 کو ریٹائرڈ ہو چکا ہے۔ جناب والا سروسز کے دوران 2013 میں سپرنٹنڈنٹ سنٹرل جیل بنوں

نے ACR میں Adverac ریمارکس دیا تھا۔ جو کہ جناب سپیشل سیکرٹری ہوم نے سروس اپیل

منظور کر کے ACR 2013 کو expunge کیا (کاپی منسلک ہے) بعد میں اسی سپرنٹنڈنٹ

سنٹرل جیل بنوں نے مجھے ڈیوٹی کے لئے انٹرنل سنٹرل مروت جیل بھیجا گیا تھا۔ صرف و صرف تنخواہ کے

لیے میں سپرنٹنڈنٹ سنٹرل جیل بنوں کے ساتھ منسلک تھا۔ لیکن پھر بھی دوبارہ اسی سپرنٹنڈنٹ جیل بنوں

نے ACR 2014 میں Adverce ریمارکس دیا۔ جس کا میں نے تھر و جناب انسپکٹر جنرل جیل

خانہ جات کے پی کے ہوم سیکرٹری کو اپیل کیا۔ اور میں نے موقع پر پرسنل ہائرنگ کے دوران حقیقی بیان

دے کر اس کو مطمئن کیا۔ جس کی وجہ سے جناب اسپیشل ہوم سیکرٹری صاحب نے میرا اپیل منظور کر کے

ACR 2014 Expunge کیا (کاپی منسلک ہے)۔

لیکن جناب آئی جی جیل خانہ جات کے پی کے نے میرے ساتھ زیادتی اور ظلم کر کے میری حق

تلفی کی اور مجھے نظر انداز کیا گیا اور میں نے تقریباً 60 سال کی عمر تک محکمہ کا خدمت کیا اور میری ACRs

میں ریمارکس Good یا Very Good ہیں کاپیاں منسلک ہیں

اور پرموشن BPS14 سے BPS 16 میں نہیں کیا۔

حالانکہ 2008 سے تاحال BPS 16 کا سنکشن پوسٹ خالی پڑا رہا۔

لہذا من سائل مجبور ہو کر جناب والا عدالت عالی کو (سروسز ٹریبونل سے انصاف دلانے کے لئے دروازہ کھٹکھٹایا۔

مجھے امید ہے کہ اس بڑھاپے اور معذروں کی حالت پر رحم فرمائیں گے اور مجھے اپنا حق  
11/6/2015 سے جناب ہوم ڈیپارٹمنٹ کے آفس آرڈر نمبر SO

(Prisons)-HD/8-6/2013/BC-137240.Dated 11 June

2015 (کاپی منسلک ہے) دلائیں گے۔ بندہ غریب تاحیات دعا گو رہے گا۔

عین نوازش ہوگی

فقط آداب مورخہ۔۔۔ 2017۔۔۔ 31۔۔۔

العارض

*Imam Hussain*

آپکا تابعدار (ریٹائرڈ مسٹر امام حسین سنٹیئر کلرک BPS 14۔

حالانکہ 2008 سے تاحال BPS 16 کا سنکشن پوسٹ خالی پڑا رہا۔

لہذا من سائل مجبور ہو کر جناب والا عدالت عالی کو (سروسز ٹریبونل سے انصاف دلانے کے لئے دروازہ کھٹکھٹایا۔

مجھے امید ہے کہ اس بڑھاپے اور معذروی کی حالت پر رحم فرمائیں گے اور مجھے اپنا حق

11/6/2015 سے جناب ہوم ڈیپارٹمنٹ کے آفس آرڈر نمبر S O

(Prisons)-HD/8-6/2013/BC-137240.Dated 11 June

2015 (کاپی منسلک ہے) دلائیں گے۔ بندہ غریب تاحیات دعا گو رہے گا۔

عین نوازش ہوگی

فقط آداب مورخہ۔۔۔ 2017-5-31

العارض

*Jorhan Hussain*  
آپکا تابعدار (ریٹائرڈ مسٹر امام حسین سنپیر کلرک BPS 14۔

BEFORE THE KHYBER PAKHTUNKHWA HON'BLE  
SERVICE TRIBUNAL PESHAWAR.

Appeal No.311/2016

Imam Hussain \*\*\* Versus\*\*\*\* Govt of KPK &  
others.

Appellant's Rejoinder.

Respectfully Sheweth:

Preliminary Objections:

That all the objections raised by the respondents are incorrect and are not sustainable, hence denied, vehemently.

Facts:

1,2) In reply of the Paras No.1 and 2 of the respondents, it is submitted that Para No.1 and 2 of the appeal of appellant are correct.

3) That Para No.3 of the comments is denied, on appeal of the appellant the adverse remarks has been expunged and after that the appellant has the right of promotion.

4) Para No.4 of the comments is denied, all the allegations against the appellant and the adverse remarks in the P.E.R of the appellant for the period from 18/08/2013 to 31/12/2013



Office Order dated 22/12/2014 Order No.SO(PRISONS)/8-3/HD/BC-113969/ 2014/ Vol: III has been expunged and the adverse remarks of the appellant for the year 2014 has also been expunged through Notification No.SO/ (PRISONS)/HD/P-F/1-12/2015/BC-137131 dated 19/09/2015. (Copies of the above mentioned order are annexed herewith)

5) Para No.5 is denied, the appeal is filed by the appellant within time

**Grounds:**

A to B- Incorrect. Grounds A to B of appeal are correct and its replies are incorrect.

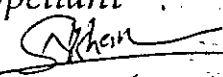
C-Incorrect. The appellant has performed his duties according to law and appellant annual confidential reports were marked very good on yearly basis. (Report is already annexed with the appeal, hence Para C of the grounds of the reply of respondents is incorrect while para C of the appeal of the appellant is correct.

D&E- Incorrect. Grounds D and E of appeal are correct and its replies are incorrect.

F- That the appellant will submit additional grounds at the time of arguments.

It is, Therefore, prayed that on acceptance of appeal and rejoinder of the appellant, the Hon'ble Service Tribunal may graciously be declare the appellant senior to the respondents No.5 to 10 and appellant be promoted being Senior and deserving with all back benefit from the date i.e. 11/06/2015 vide Home Department (SO)(Prisons)/HD/8-6/2013/BC -137240 of promotions.

Dated 31/05/2017

Appellant  
Through   
Nasir Khan Afridi  
Advocate, Peshawar.

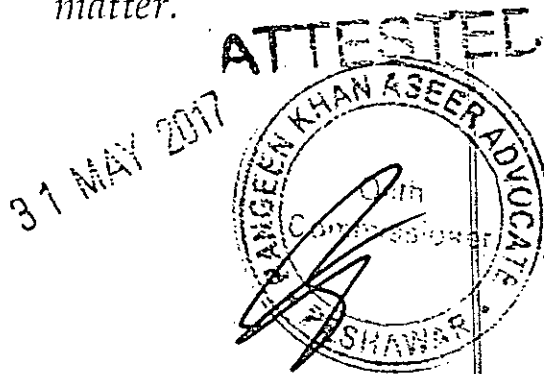
BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.

Appeal No.311/2016

Imam Hussain \*\*\* Versus\*\*\*\* Govt of KPK &  
others.

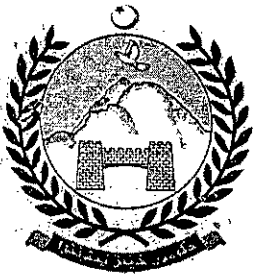
Affidavit

I, Imam Hussain, Senior Clerk BPS - 14 do hereby solemnly affirm and state on oath that all contents of appeal and rejoinder are true and correct to the best of my knowledge and belief and nothing wrong has been stated by me in the matter.



Imam Hussain  
DEPONENT

17301-1400317-3



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

PRISONS DEPARTMENT

OFFICE ORDER Inspector General

A.I.G.

Admn Officer

137  
NO. SO (PRISONS)/8-3/HD/BC-113969/2014/VOL-III: The Competent Authority has been pleased to expunge the Adverse Remarks in the P.E.R of Mr. Imam Hussain Senior Clerk for the period from 18/08/2013 to 31/12/2013 on humanitarian grounds.

Sd

Special Secretary Home

Dated the 22<sup>nd</sup> December, 2014, Peshawar.

(REHMAT ALI WAZIR)  
SECTION OFFICER (PRISONS)  
GOVT OF KHYBER PAKHTUNKHWA

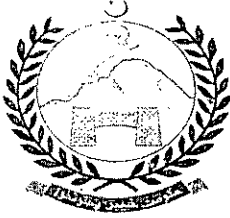
NO. SO (PRISONS)/8-3/HD/BC-113969/2014/VOL-III: - Dated the 22<sup>nd</sup> December, 2014, Peshawar.

A copy is forwarded for information and necessary action to: -

1. Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary Home, Khyber Pakhtunkhwa.
3. PS to Special Secretary Home, Khyber Pakhtunkhwa.
4. Official concerned.
5. Master file/Office Order file.

SECTION OFFICER (PRISONS)





GOVERNMENT OF KHYBER PAKHTUNKHWA,  
HOME & TRIBAL AFFAIRS DEPARTMENT.

Dated Peshawar 19<sup>th</sup> November, 2015.

199  
M  
20/11

NOTIFICATION.

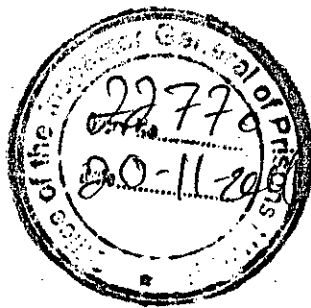
**NO. SO(PRISONS)HD/P-F/1-12/2015/BC-137131:** In exercise of the powers conferred under Rule-6.6 (ii) of the Instructions on Performance Evaluation Report, the Competent Authority has been pleased to expunge the adverse remarks recorded in the P.E.R of Mr. Imam Hussain, Senior Clerk, Inspectorate of Prisons for the year 2014. Necessary entries shall be given in average category in the general assessment as per instructions contained in the rule ibid.

Secretary to Government of Khyber Pakhtunkhwa,  
Home & Tribal Affairs Department.

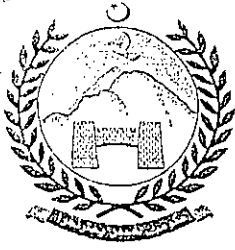
Copy to: -

- ✓ 1. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar for necessary action as requirement under Rule 6.6(ii) of Instruc: on Perform: Evalu: Report..
2. PS to Secretary Home. Khyber Pakhtunkhwa.
3. PS to Special Secretary Home, Khyber Pakhtunkhwa.
4. Official/Officer concerned.
5. Master File/Office Order File.

Section Officer (Prisons)



AIG  
20/11



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

No.SO(Prisons)-HD/8-6/2013/ BC-137240. The Competent Authority in consultation with the Departmental Promotion Committee is pleased to order promotion of the following Senior Clerks (BPS-14) to the post of Assistant (BPS-16) on regular basis, with immediate effect:-

- 1- Mr. Irfanullah,
- 2- Mr. Anayat-ur-Rehman.
- 3- Mr. Zahir Shah.
- 4- Mr. Abid Hussain.
- 5- Mr. Niaz Ali.
- 6- Mr. Raj Wali.
- 7- Mr. Muhammad Ali.
- 8- Mr. Abid Jamal.
- 9- Mr. Muhammad Javed.
- 10- Mr. Sajid Ali.

The officers from S.No.1 to 10 above will be on probation for a period of one year in terms of Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules-1989 and Section 6 (2) of Khyber Pakhtunkhwa Civil Servant Act 1973.

Their services are hereby placed at the disposal of Inspector General of Prisons Khyber Pakhtunkhwa for their further posting.

Secretary to Government of  
Khyber Pakhtunkhwa Home & T.As  
Department Peshawar

Dated the, 11<sup>th</sup> June, 2015, Peshawar.

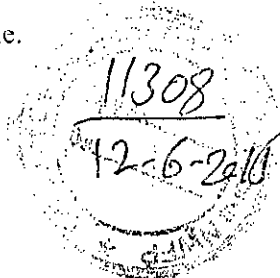
(Rehmat Ali Wazir)  
SECTION OFFICER (PRISONS)

No.SO(Prisons)-HD/8-6/2013/ BC-137240.- Dated the, 11<sup>th</sup> June, 2015, Peshawar.

A copy is forwarded for information and necessary action to: -

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar, for information and necessary action.
3. Director IT, Home & TAs Department, Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary Home, Khyber Pakhtunkhwa.
5. PS to Special Secretary Home, Khyber Pakhtunkhwa.
6. Officer Concerned.
7. Master file/Office Order file.

SECTION OFFICER (PRISONS)



Form "G" (Revised)  
Assistant and Clerks

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 02-02-2015 to 23-06-2015

PART-I

- 1. Name Imam Hussain.
- 2. Designation Senior Clerk.
- 3. Date of Birth 15-04-1956.
- 4. Date of Entry into Government service 24-06-1990.
- 5. Branches in which employed during the year, with period pay and Allowances, MSK ETC.

RT-II

A. PERFORMANCE

	AI	A	B	C	D
1. Referencing, paging of notes and correspondence	§				
2. Movement of Files and record of suspense cases.	§				
3. Keeping files and Papers tidy con.	§				
4. Promptness and accuracy in disposal	§				
B. PERSONAL TRAITS					
5. Intelligence.		§			
6. Knowledge of Procedures and Regulations.		§			
7. Punctuality		§			
8. Cooperation and Fact.	§				
9. Amenability to Discipline	§				
10. Skill in Drafting.	§				

11. Integrity

Assessment

- i). Incorruptible Not Corrupted §
- ii). Reported to be corrupt NO. §
- iii). Believed to be corrupt, because of
  - a. Monetary Consideration NO. §
  - b. Other Considerations NO. §

- |  |          |             |
|--|----------|-------------|
|  | Yes      | 0           |
| 12. Knowledge of Typing  | <u>✓</u> | _____       |
| 13. Trust Worthiness in confinement and secret matters.              | <u>✓</u> | _____       |
| 14. Any Disciplinary action taken during the period of under report. | <u>✓</u> | NO <u>✓</u> |

By \_\_\_\_\_ B \_\_\_\_\_

PART-III

- |   |                            |                               |
|---|----------------------------|-------------------------------|
|   | <u>Reporting Officer.</u>  | <u>Countersigning Officer</u> |
| i. Recommended for acceleration promotion                               | _____                      | _____                         |
| b. Fit for promotion  | <u>Fit for promotion ✓</u> | _____                         |
| c. Recently promoted / appointed consideration for promotion pre-mature | _____                      | _____                         |
| d. Not yet fit for promotion.   | _____                      | _____                         |
| e. Unfit for further promotion.   | _____                      | _____                         |

General Assessment

- |                   |                          |                                  |
|-------------------|--------------------------|----------------------------------|
|                   | <u>Reporting Officer</u> | <u>By Countersigning Officer</u> |
| i. Very good      | <u>good ✓</u>            | _____                            |
| ii. Good          | _____                    | _____                            |
| iii. Average      | _____                    | _____                            |
| iv. Below Average | _____                    | _____                            |
| v. Poor           | _____                    | _____                            |

PEN PICTURE

He is hard worker. knowing his job and fit for promotion on his turn.

Reporting Officer's Signature [Signature]  
 Name (in Block Letters) SA B2 ALI  
 Designation SR. Assistant Superintendent

Dated \_\_\_\_\_

GENERAL REMARKS BY HIGHER OFFICER

Countersigning Officer's signature \_\_\_\_\_  
 Name (In Block Letters) \_\_\_\_\_  
 Designation \_\_\_\_\_



Form 'G' (Revised)  
Assistant and Clerks.

(15)

# GOVERNMENT OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT

## CONFIDENTIAL REPORT

For the period from 24-6-2015 to 31-12-2015

**PART-I**

1. Name IMAM HUSS

2. Designation SENIOR CLERK

3. Date of Birth 15-04-1955

4. Date of Entry into Government 26-11-70

5. Branches in which employed during period PRY AND PROSEC

### PART-II

#### PERFORMANCE

	A	B	C	D
1. Referencing, paging of notes and correspondence	✓			
2. Movement of Files and record of suspense cases.	✓			
3. Keeping files and Papers tidy condition	✓			
4. Promptness and accuracy in disposing	✓			
<b>PERSONAL TRAITS</b>				
5. Intelligence	✓			
6. Knowledge of Procedures and Regulations.	✓			
7. Punctuality	✓			
8. Cooperation and Fact.	✓			
9. Amenability to Discipline	✓			
10. Skill in Drafting.	✓			

#### Integrity

#### Assessment

- i). Incorruptible - NOT CORRUPT -
- ii). Reported to be corrupt - NO -
- iii). Believed to be corrupt, because:
  - a. Monetary Consideration - No -
  - b. Other Consideration: - No -

Respected  
Advocate

16

- 12. Knowledge of Typing Yes
- 13. Trust Worthiness in confinement and matters. Yes
- 14. Any Disciplinary action taken during period of under report. Yes

		By	
a. Recommended for acceleration promotion	Reporting Officer	Countersigning Officer	
b. Fit for promotion	YES <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/>	
c. Recently promoted / appointed consideration for promotion pre-mature	YES <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/>	
d. Not yet fit for promotion.	- <input checked="" type="checkbox"/>	- <input checked="" type="checkbox"/>	
e. Unfit for further promotion.	no <input checked="" type="checkbox"/>	no <input checked="" type="checkbox"/>	

PART-IV

General Assessment

	By Reporting Officer	By Countersigning Officer
i. Very good	Very Good <input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Good	- <input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Average	- <input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Below Average	- <input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Poor	- <input checked="" type="checkbox"/>	<input type="checkbox"/>

He is hardworking, obedient and progressive in his job and work. He has no demerits.

Reporting Officer's Signature *[Signature]*

Name (in Block Letters) Sybil Prudhviraj Singh

Designation Inspector, INTERIOR SECURITY

Department Prisons, Bangalore

Place Bangalore

Countersigning Officer's Signature \_\_\_\_\_

Name (in Block Letters) \_\_\_\_\_

Designation \_\_\_\_\_

Dated \_\_\_\_\_

Attested  
*[Signature]*  
Advocate

GENERAL REMARKS

Form "G" (Revised)  
Assistant and Clerks

# GOVERNMENT OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT

## CONFIDENTIAL REPORT

For the period from 08-03-2012 to 02-08-2013

**PART-I**

1. Name Jamaon Hussain

2. Designation Deputy Clerk

3. Date of Birth 15-04-1956

4. Date of Entry into Government service 24-06-1990

5. Branches in which employed during the term with period Pay and Allowances

**PART-II**

A. PERFORMANCE		AI	A	B	C	D
1.	Referencing, paging of notes and correspondence					
2.	Movement of Files and record of suspense cases.					
3.	Keeping files and Papers tidy condition					
4.	Promptness and accuracy in disposing					
B. PERSONAL TRAITS						
5.	Intelligence.					
6.	Knowledge of Procedures and Regulations.					
7.	Punctuality					
8.	Cooperation and Fact.					
9.	Amenability to Discipline					
10.	Skill in Drafting.					

**II. Integrity**

Assessment

- i). Incorruptible
- ii). Reported to be corrupt
- iii). Believed to be corrupt, because of
  - a. Monetary Consideration
  - b. Other Considerations

- NOT CORRUPT -

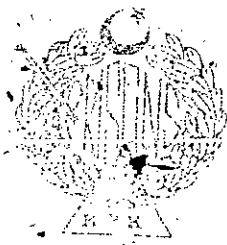
- NO -

- NO -

- NO -

- NO -





OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. 8/24-J-2007/13246  
DATED 20-05-2014

NOTIFICATION

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, Final Seniority list of Senior Clerks (BPS-09) as it stood on 01-4-2014 is notified/circulated:-

S#	NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT.	DATE OF 1 <sup>ST</sup> ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION			PRESENT APPOINTMENT	REMARKS
				DATE	BPS	METHOD OF APPOINTMENT		
1.	Mr. Irfanullah (B.A)	01-11-1959 (Charsadda)	02-03-1986	14-10-2005	9	By promotion	Senior Clerk.	
2.	Mr. Prain <i>Dieel</i> (D.Com)	25-04-1965 (Peshawar)	01-11-1987	01-11-2005	9	-do-	Senior Clerk.	Seniority maintained as in lower scale.
3.	Mr. Akhtar Shah (F.A)	11-04-1967 (Peshawar)	Warder 03-05-1986 J/Clerk 02-10-1988.	14-10-2005	9	-do-	Senior Clerk.	-do-
4.	Mr. Anayat-ur-Rehman (F.A)	24-11-1964 (Abbottabad)	Warder 24-04-1987 J/Clerk 27-1-1990.	01-11-2005	9	-do-	Senior Clerk.	-do-
5.	Mr. Zahir Shah (Matric)	15-02-1968 (Charsadda)	31-05-1990	7-11-2005	9	-do-	Senior Clerk.	-do-
6.	Mr. Imam Hussain. <i>6 Nos</i> (F.A)	15-04-1956 (Kohat)	25-06-1990	7-11-2005	9	-do-	Senior Clerk.	-do-
7.	Mr. Abid Hussain (D.Com)	05-01-1967 (D.I. Khan)	29-09-1990	04-08-2006	9	-do-	Senior Clerk.	-do-
8.	Mr. Niaz Ali (FA)	10-04-1968 (Charsadda)	17-11-1990	19-07-2006	9	-do-	Senior Clerk.	-do-
9.	Mr. Raj Wali (B.A)	20-02-1969 (Mohmand Agency)	24-11-1990	24-08-2006	9	-do-	Senior Clerk.	-do-
10.	Mr. Muammad Ali (M.A)	14-11-1957 (Mohmand Agency)	06-08-1986	1-9-2008	9	-do-	Senior Clerk.	-do-
11.	Mr. Ali Haider (B.A)	3-12-1961 (Peshawar)	20-4-1987	1-9-2008	9	-do-	Senior Clerk.	-do-
12.	Mr. Abid Jamal (D.Com)	12-04-1967 (Peshawar)	03-08-1991	17-9-2008	9	-do-	Senior Clerk.	-do-
13.	Mr. Muhammad Latif Khan. (Matric)	07-02-1965 (Bannu)	19-09-1991	1-10-2008	9	-do-	Senior Clerk.	-do-



**NOTIFICATION**

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. 13240/8/247-2007

DATED 20-05-2014

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, Final Seniority list of Assistants (BPS-14) as it stood on 01-4-2014 is notified/circulated:-

S#	NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT.	DATE OF 1 <sup>st</sup> ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION			PRESENT APPOINTMENT	REMARKS
				DATE	BPS	METHOD OF APPOINTMENT		
1.	Mr. Zahid Nawaz (F.A)	13-02-1968 (Swabi)	J/Clerk 10-03-1986	28-2-2009	14	-do-	Assistant.	Seniority maintained as in the lower scale.
2.	Mr. Jehan Zeb (Matric)	04-03-1961 (Swabi)	J/Clerk 22-07-1979	22-7-2011	14	-do-	Assistant.	
3.	Mr. Gohar Ali (F.A)	17-03-1967 (Charsadda)	J/Clerk 04-09-1986	01-8-2011	14	-do-	Assistant.	-do-
4.	Mr. Mass Khan (F.A)	21-11-1968 (Peshawar)	J/Clerk 14-09-1987	01-8-2011	14	-do-	Assistant.	-do-
5.	Mr. Nasir-ud-Din (F.A)	16-05-1964 (Peshawar)	warder 02-12-1986	24-8-2012	14	-do-	Assistant.	-do-
6.	Mr. Fazal Ala (B.A)	07-01-1964 (Charsadda)	J/Clerk 27-01-1990.	13-6-2013	14	-do-	Assistant.	-do-
	Mr. Aurang Zeb (Matric)	14-01-1966 (Charsadda)	Warder 05-04-1986 J/Clerk 07-4-1990	11-6-2013	14	-do-	Assistant.	-do-
			J/Clerk 01-10-1985			-do-	Assistant.	-do-

ENDST; NO. 13241-45

- Copy of the above is forwarded to :-
1. The Superintendents Central Prisons Peshawar, Haripur, Bannu & D.I. Khan.
  2. Office Accountant/

For information of the officials concerned.

*Handwritten signature and 'Circular' stamp*

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.

ASSISTANT DIRECTOR (ADMN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

1070  
26/05/2014



8-3-

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. \_\_\_\_\_


DATED 20-05-2014

ENDST; NO. 13247-72

- Copy of the above is forwarded to :-

1. All Superintendents of Jails /Lockups/Internment Centres.
2. Office Accountant/.

For information of the officials concerned.

  
ASSISTANT DIRECTOR (ADMN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

بحضور جناب ولاشان سروسز ٹریبونل خیبر پختونخواہ پشاور

پرسنل ہائرنگ

امام حسین بنام جناب چیف سیکرٹری صاحب وغیرہ

جناب عالی

مؤدبانہ التماس کی جاتی ہے کہ من سائل مسٹر امام حسین سنیر کلرک BPS14 مورخہ 14 اپریل 2016 کو ریٹائرڈ ہو چکا ہے۔ جناب والا سروسز کے دوران 2013 میں سپرنٹنڈنٹ سنٹرل جیل بنوں نے ACR میں Adverac ریمارکس دیا تھا۔ جو کہ جناب سپیشل سیکرٹری ہوم نے سروس اپیل منظور کر کے ACR 2013 کو expunge کیا (کاپی منسلک ہے) بعد میں اسی سپرنٹنڈنٹ سنٹرل جیل بنوں نے مجھے ڈیوٹی کے لئے انٹرنل سنٹرل مروت جیل بھیجا گیا تھا۔ صرف و صرف تنخواہ کے لیے میں سپرنٹنڈنٹ سنٹرل جیل بنوں کے ساتھ منسلک تھا۔ لیکن پھر بھی دوبارہ اسی سپرنٹنڈنٹ جیل بنوں نے ACR 2014 میں Adverce ریمارکس دیا۔ جس کا میں نے تھر و جناب انسپکٹر جنرل جیل خانہ جات کے پی کے ہوم سیکرٹری کو اپیل کیا۔ اور میں نے موقع پر پرسنل ہائرنگ کے دوران حقیقی بیان دے کر اس کو مطمئن کیا۔ جس کی وجہ سے جناب اسپیشل ہوم سیکرٹری صاحب نے میرا اپیل منظور کر کے ACR 2014 Expunge کیا (کاپی منسلک ہے)۔

لیکن جناب آئی جی جیل خانہ جات کے پی کے نے میرے ساتھ زیادتی اور ظلم کر کے میری حق تلفی کی اور مجھے نظر انداز کیا گیا اور میں نے تقریباً 60 سال کی عمر تک محکمہ کا خدمت کیا اور میری ACRs میں ریمارکس Good یا Very Good ہیں کاپیاں منسلک ہیں اور پرموشن BPS14 سے BPS 16 میں نہیں کیا۔



حالات 2008 سے تا حال BPS 16 کا سنکشن پوسٹ خالی پڑا رہا۔

لہذا من سائل مجبور ہو کر جناب والا عدالت عالی کو (سروسز ٹریبونل سے انصاف دلانے کے لئے دروازہ کھٹکایا۔

مجھے امید ہے کہ اس بڑھاپے اور معذروں کی حالت پر رحم فرمائیں گے اور مجھے اپنا حق  
11/6/2015 سے جناب ہوم ڈیپارٹمنٹ کے آفس آرڈر نمبر S O

(Prisons)-HD/8-6/2013/BC-137240.Dated 11 June

2015 (کاپی منسلک ہے) دلائیں گے۔ بندہ غریب تاحیات دعا گو رہے گا۔

عین نوازش ہوگی

فقط آداب مورخہ۔۔۔ 2017۔۔۔ 31۔۔۔

العارض

آپکا تابعدار (ریٹائرڈ مسٹر امام حسین سنٹیئر کلرک BPS 14۔۔۔  
Imam Hussain

Svc = Appeal No = 311/16 16/1/16 63/16/15

Subject: - MINUTES OF THE DPC MEETING HELD ON 02-06-2015 AT 1400 HOURS, FOR THE PROMOTIONS / APPOINTMENT ON ACTING CHARGE BASIS :-

- (i) ASSISTANT SUPERINTENDENT JAIL (BPS-14) TO SENIOR ASSISTANT SUPERINTENDENT JAIL (BPS-16)
- (ii) SENIOR CLERK (BPS-14) TO THE POST OF ASSISTANT (BPS-16)

A meeting of the Departmental Promotion Committee on the subject cited cases was held on 02-06-2015 at 1400 hours in the office of Secretary to Government of Khyber Pakhtunkhwa Home and T.As Department under his chairmanship. The following attended the meeting: -

- |   |                     |
|---|---------------------|
| 1. Mr. Siraj Ahmad,<br>Special Secretary Home & T.As Department/<br>Inspector General of Prisons.   | In<br>Chair/Member. |
| 2. Mr. Wazir Muhammad Afgar<br>Section Officer(Regulation)<br>Finance Department Khyber Pakhtunkhwa | Member              |
| 3. Mr. Shafi-ul-Ahrmad<br>Section Officer (R-III)<br>Establishment Department Khyber Pakhtunkhwa    | Member              |
| 4. Mr. Rehmat Ali Wazir,<br>Section Officer(Prisons)<br>Home & T.As Department Wazir Muhammad Afgar | Secretary           |

The Chair welcome to the participants. The committee examined the subject cited cases one by one and after detailed discussion, the following decisions were made:-

PROMOTIONS / APPOINTMENTS OF ASSISTANT SUPERINTENDENT JAIL (BPS-14) TO THE POST OF SENIOR ASSISTANT SUPERINTENDENT JAIL (BPS-16)

S#	NAME OF OFFICER	DECISIONS OF DPC
1	Mr. Muhammad Naem Assistant Superintendent Jail (BPS-14)	Due to containing major penalty of reduction to the lower post awarded to him vide I.G. Prisons office order No.32056 dated 20-12-2012, the committee did not consider suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16), hence superseded.
2	Mr. Abdul Hakim, Assistant Superintendent Jail (BPS-14)	Due to containing major penalty of reduction to the lower post awarded to him vide Home Department order No.2/3-SO(Pris)HD/10 dated 12-1-2011, the committee did not consider suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16), hence superseded.
3	Mr. Ayub Bacha, Assistant Superintendent Jail (BPS-14).	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
4	Syed Mohy-ud-Din Shah Assistant Superintendent Jail (BPS-14)	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
5	Mr. Zahir Shah, Assistant Superintendent Jail (BPS-14)	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
6	Mr. Amjad Ali Khan, Assistant Superintendent Jail (BPS-14)	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
7	Mr. Riaz Muhammad Khan, Assistant Superintendent Jail(BPS-14)	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
8	Mr. Abdul Nasir Khan, Assistant Superintendent Jail (BPS-14)	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
	<p style="text-align: center;"><b>ATTESTED</b></p> <p style="text-align: center;"><i>[Signature]</i> Assistant Director (Admin) For I.G. Prisons</p>	

638-447

NAME OF OFFICER	DECISIONS OF DPC
Mr. Shamroze Khan, Assistant Superintendent Jail (BPS-14).	The committee was informed that in the light of inquiry report the said official exonerated from the charges, therefore, subject to proper exoneration orders of the competent authority of the said official, the committee considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis keeping in view of his satisfactory service record.
Mr. Shehryar, Assistant Superintendent Jail (BPS-14).	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
Syed Zainul Arifeen Shah, Assistant Superintendent Jail (BPS-14).	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
Mr. Yousaf Gul, Assistant Superintendent Jail (BPS-14).	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
Syed Rizwan Shah, Assistant Superintendent Jail (BPS-14).	Committee, considered him suitable for promotion to the post of Senior Assistant Superintendent Jail (BPS-16) on regular basis, keeping in view of his satisfactory service record.
Mr. Ihsan-ud-Din, Assistant Superintendent Jail (BPS-14).	The official holding the existing post with effect from 1-10-2010, thus his required length of five years service is short only for 04 months and as per provision in Rule-9 of Khyber Pakhtunkhwa Civil Servant Appointments, Promotion and Transfer Rules, 1989, committee considered him suitable for appointment as Senior Assistant Superintendent Jail (BPS-16) on acting charge basis.
Mr. Anwar Shamim Khan, Assistant Superintendent Jail (BPS-14).	The official holding the existing post with effect from 1-10-2010, thus his required length of five years service is short only for 04 months and as per provision in Rule-9 of Khyber Pakhtunkhwa Civil Servant Appointments, Promotion and Transfer Rules, 1989, committee considered him suitable for appointment as Senior Assistant Superintendent Jail (BPS-16) on acting charge basis.
Syed Muhammad Salman Shah, Assistant Superintendent Jail (BPS-14).	The official holding the existing post with effect from 7-10-2010, thus his required length of five years service is short only for 04 months and as per provision in Rule-9 of Khyber Pakhtunkhwa Civil Servant Appointments, Promotion and Transfer Rules, 1989, committee considered him suitable for appointment as Senior Assistant Superintendent Jail (BPS-16) on acting charge basis.
Mr. Aliab Ahmad, Assistant Superintendent Jail (BPS-14).	The official holding the existing post with effect from 1-10-2010, thus his required length of five years service is short only for 04 months and as per provision in Rule-9 of Khyber Pakhtunkhwa Civil Servant Appointments, Promotion and Transfer Rules, 1989, committee considered him suitable for appointment as Senior Assistant Superintendent Jail (BPS-16) on acting charge basis.

(ii) PROMOTIONS OF SENIOR CLERK (BPS-14) TO THE POST OF ASSISTANT (BPS-16)

NAME OF OFFICIAL	DECISIONS OF DPC
Mr. Irfanullah, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
Mr. Praim, Senior Clerk (BPS-14).	The committee was informed that the said Senior Clerk has been died on 01-6-2015, hence not considered for promotion.
Mr. Akhtar Shah, Senior Clerk (BPS-14).	The said official opted in writing for his promotion to the executive cadre i.e Assistant Superintendent Jail, hence the committee accepted his option and as per Rules-7 sub rule-5 of (Appointment, Promotion & Transfer) Rules-1989 vide Government of Khyber Pakhtunkhwa Establishment Department Notification

ATTESTED

Assistant Director (Admin)  
 For I.C. Prisons  
 Khyber Pakhtunkhwa Peshawar

6/11/14

Sl#	NAME OF OFFICIAL	DECISIONS OF DPC
		No.SOR-VI(E&AD)1-3/2009/Vol-VIII dated 22-10-2011, the said official will not be considered for promotion to the post of Assistant (BPS-16) in next four years.
4-	Mr.Anayat-ur-Rehman, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
5-	Mr.Zahir Shah, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
6-	Mr.Imam Hussain, Senior Clerk (BPS-14)	Due to containing adverse remarks in his P.E.R for the year 2014, the committee did not consider him suitable for promotion to the post of Assistant (BPS-16), hence superseded.
7-	Mr.Abid Hussain, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
8-	Mr.Niaz Ali, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
9-	Mr.Raj Wali, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
10-	Mr.Muhammad Ali, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
11-	Mr.Abid Jamal, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
12-	Mr.Muhammad Latif, Senior Clerk (BPS-14).	Due to containing adverse remarks in his P.E.R for the years 2013 & 2014 as well as major penalty of reduction to lowest stage in present time pay scale awarded to him in a departmental proceeding vide I.G.Prisons office order No.26276 dated 23-10-2014, the committee did not consider him suitable for promotion to the post of Assistant (BPS-16), hence, superseded.
13-	Mr.Muhammad Javed, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.
14-	Mr.Sajid Ali, Senior Clerk (BPS-14).	Committee, considered him suitable for promotion to the post of Assistant (BPS-16) on regular basis, keeping in view of his satisfactory service record.

SIRAJ AHMAD.

SPECIAL SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT/INSPECTOR GENERAL OF PRISONS

( WAZIR MUHAMMAD AFGAR )  
SECTION OFFICER (R)  
FINANCE DEPARTMENT  
KHYBER PAKHTUNKHWA

( SHAFI-UL-AHMAD )  
SECTION OFFICER (R-III)  
ESTABLISHMENT DEPARTMENT  
KHYBER PAKHTUNKHWA

( REHMAT ALI WAZIR )  
SECTION OFFICER (PRISONS)  
GOVT OF KHYBER  
PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS  
DEPARTMENT

ATTESTED

Assistant Secretary (Prisons)  
For I.G. Prisons  
Khyber Pakhtunkhwa Peshawar

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 320 /ST

Dated 22 - 2 - / 2019

To


The Inspector General of Prison,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject: -

JUDGMENT IN APPEAL NO. 311/2016, MR. IMAM HUSSAIN.

I am directed to forward herewith a certified copy of Judgement dated 18.02.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

Form 'G' (Revised)  
Assistant and Clerks

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PRISONS DEPARTMENT

CONFIDENTIAL REPORT

For the period from 01-01-2019 to 31-12-2019

PART-I

1. Name Imam Habbani
2. Designation Senior Clerk
3. Date of Birth 15-04-1956
4. Date of Entry into Government service 25-06-1990
5. Branches in which employed during the year, with period Pay Branch etc

PART-II

A. PERFORMANCE		AI	A	B	C	D
1.	Referencing, paging of notes and correspondence			<u>C</u>		
2.	Movement of Files and record of suspense cases.			<u>C</u>		
3.	Keeping files and Papers tidy condition			<u>C</u>		
4.	Promptness and accuracy in disposing			<u>C</u>		
B. PERSONAL TRAITS						
5.	Intelligence.			<u>C</u>		
6.	Knowledge of Procedures and Regulations.			<u>C</u>		
7.	Punctuality			<u>C</u>		
8.	Cooperation and Tact.			<u>C</u>		
9.	Amenability to Discipline			<u>C</u>		
10.	Skill in Drafting.			<u>C</u>		

11. Integrity
  - i). Incorruptible
  - ii). Reported to be corrupt
  - iii). Believed to be corrupt, because of
    - a. Monetary Consideration
    - b. Other Considerations

Assessment

Corrupt

Corrupt  
Monetary

Yes

No

Reported to be corrupt, because of

a. Monetary Consideration

b. Other Considerations

NO

NO

NO

- 12. Knowledge of Typing
- 13. Trust Worthiness in confinement and secret matters.
- 14. Any Disciplinary action taken during the period of under report.

**PART-III**

- |   | By Reporting Officer. | By Countersigning Officer. |
|---|-----------------------|----------------------------|
| a. Recommended for acceleration promotion                               |                       |                            |
| b. Fit for promotion  |                       |                            |
| c. Recently promoted / appointed consideration for promotion pre-mature |                       |                            |
| d. Not yet fit for promotion.   |                       | ZA                         |
| e. Unfit for further promotion.   |                       |                            |

**PART-IV**

- | General Assessment | By Reporting Officer | By Countersigning Officer |
|--------------------|----------------------|---------------------------|
| i. Very good       |                      |                           |
| ii. Good           |                      |                           |
| iii. Average       |                      |                           |
| iv. Below Average  |                      |                           |
| v. Poor            |                      |                           |

**PEN PICTURE**

An intelligent trustworthy officer

Reporting Officer's Signature

Name (in Block Letters) **SHAH BAHADUR**

Signature

Dated

15/11/2015

**GENERAL REMARKS BY HIGHER OFFICER**

Countersigning Officer's Signature

Name (In Block Letters) **KIFAYATU**

Designation **Asst. Dir.**

ASSISTANT DIRECTOR (ADMIN)  
 For Inspector General of Prisons  
 Khyber Pakhtunkhwa Peshawar

22.3.15