BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Amended Service Appeal No. 11954/2020

Mr. Dil Nawaz Khan, Addl: Assistant Commissioner, Tangi, Charsadda.....**Appellant**

VERSUS

Chief Secretary, Khyber Pakhtunkhwa & Others .....**Respondents**

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Dated: **08.12.2023**

Deponent
CNIC No: 17301-6272682-3
Contact No: 0315-5737137

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Amended Service Appeal No.11954 /2020

Dil Nawaz Khan, Addl:Assistant Commissioner, Tangi, Charsadda.....**(Appellant)**

Versus

1. Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar.
3. Senior Member Board of Revenue, Revenue & Estate Department Khyber Pakhtunkhwa, Peshawar.

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

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No.1 to 3.

Respectfully Sheweth, the Respondents submit as under:-

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action/locus standi to file the instant appeal against the respondents.
2. That the instant appeal is hit by Section 4 (b) (i) of the Khyber Pakhtunkhwa, Services Tribunal Act, 1974.
3. That the appellant has presented the facts in manipulated form which disentitles him for any relief whatsoever.
4. That this Honourable Tribunal lacks jurisdiction in the matter under Section 4(b)(i) of the Service Tribunal Act, 1974.
5. That the appellant has suppressed material facts from the Tribunal.
6. That the appellant has not come to the Tribunal with clean hands.
7. That the appellant is estopped to file the instant appeal due to his own conduct.
8. That the appeal is bad for mis /non-joinder of necessary parties.
9. That the appeal is barred by law and limitation.
10. That the appeal is not maintainable in its present form.

ON FACTS:

1. **Correct** that the appellant is an employee of Respondent Department and currently serving as Additional Assistant Commissioner, Tehsil Tangi, Charsadda.

2. **Correct** to the extent that the appellant appeared at Serial No.46 of the panel which was prepared to be placed before the Provincial Selection Board for determination of eligibility of the panelists for their promotion to the next higher scale i.e., PMS (BPS-17). However, as admitted by the appellant vide **Para-4 of the "Facts"**, the scheduled meeting for 20.02.2020 was postponed due to the judgment of Peshawar High Court whereby the amendment to the Civil Servants Act by the Provincial Government regarding the enhancement of retirement age from 60 to 63 years was declared null and void.

3. **Correct** to the extent that according to Provincial Management Service (PMS) Rules, 2007, 20% quota was reserved for promotion of Tehsildars to PMS (BS-17) cadre.

4. **As admitted** by the appellant, PSB meeting was scheduled for 20.02.2020, was postponed due to the judgment passed by Peshawar High Court Peshawar dated: 19.02.2020 in writ petition No.5673-P/2019 and resultantly, a considerable number of officers included in the panels, prepared for PSB, got retired as they attained age of superannuation i.e. 60 years. In

light of the judgment, the Provincial Government decided the retirement cases as per circular letter No: SO(Policy)E&AD/1-13/2019 dated: 16.03.2020 and fresh working papers had to be prepared. The Government of Khyber Pakhtunkhwa declared emergency in the wake of the escalation in the transmission of COVID-19 and ordered closure of all departments except a few essential ones. Next meeting of PSB was held on 09.06.2020, wherein the appellant was promoted.

5. **Incorrect hence, denied.** No application for re-scheduling of the PSB meeting was received from the appellant: even the application, annexed as (Annex-D) does not bear the name of the appellant. Moreover, as admitted by the appellant, meeting of the PSB was scheduled on 20.02.2020 but was postponed due to the judgment passed by Peshawar High Court Peshawar dated: 19.02.2020 in writ petition No.5673-P/2019. Resultantly, a considerable number of officers included in the panel of PSB got retired as they attained age of superannuation i.e. 60 years in the light of the said judgment. Consequently, the Provincial Government decided the retirement cases in light of circular letter No: SO(Policy)E&AD/1-13/2019 dated: 16.03.2020 and fresh working papers had to be prepared. Working out the new panels and the corresponding quotas of promotion due to retirements turned out to be a voluminous task. The meeting of PSB was not re-scheduled untill 09.06.2020 as the Government of Khyber Pakhtunkhwa had declared emergency in the wake of the escalation in the transmission of COVID-19 and had ordered closure of all departments except a few essential ones. These departments, being closed could not prepare the working papers. However, the process of recruitment of PMS Officer (BS-17) through Khyber Pakhtunkhwa Public Service Commission was initiated on 20.10.2017 with the placement of requisition to Khyber Pakhtunkhwa Public Service Commission and after completion of the whole recruitment process by the Commission; Establishment Department issued appointment notification dated: 29.05.2020 in respect of the recommended candidates. Meanwhile, promotion process continued unabated and various PSB meetings were held on 08.11.2017, 28.12.2017, 03.05.2018, 17.09.2018, 26.12.2018, 19.04.2019, 23.09.2019 and 09.06.2020 which clearly indicate that no parallel can be drawn between initial recruitment and promotion of the applicants.

6. **As admitted** by the appellant, Peshawar High Court Peshawar vide judgment dated: 28.07.2020 in writ petition No: 1861-P/2020, C.M No.1009-P/2020 and Impleadment No.1010-P/2020, disposed of the case in the following terms: ***"requested for withdrawal of the writ petition with the permission to approach the proper forum. Order accordingly."*** The appellant and other PMS Officers filed departmental appeals, requesting therein for promotion w.e.f 20.02.2020 with all back benefits including seniority over the direct recruitees. It is worth mentioning that the process of recruitment of PMS Officer (BS-17) through Khyber Pakhtunkhwa Public Service Commission was initiated on 20.10.2017 with the placement of requisition to Khyber Pakhtunkhwa Public Service Commission and after completion of the whole recruitment process, Establishment Department issued their appointment notification dated: 29.05.2020.

7. **Correct** to the extent that the recruitment process of PMS (BPS-17) Officers through Khyber Pakhtunkhwa Public Service Commission was initiated on 20.10.2017 with the placement of requisition to Khyber Pakhtunkhwa Public Service Commission and upon the recommendation of the Commission, the Respondent Department after completion of due process, issued appointment order dated 29.05.2020 of the PMS (BPS-17) Officers under initial quota.

8. **Correct** to the extent that the appellant filed departmental appeal before competent authority for consideration of his promotion to PMS BS-17 w.e.f 20.02.2020. The appeal was processed and after due consideration of all the points raised in the appeal and record, rules / policies in vogue, the competent authority found no reason to accept the request of the applicant, therefore, regretted the appeal being devoid of merit.

9. The instant appeal is not maintainable being hit by Section 4 (b) (i) of the Khyber Pakhtunkhwa, Services Tribunal Act, 1974. The Hon'ble Tribunal also dismissed a similar nature **Service Appeal No.12885/2020** being hit by Section 4 (b) (i) of the Act ibid vide judgment dated 25.02.2021 **(Annex-I)**. The Hon'ble Tribunal held: "Without touching the facts, circumstances and merits of the case the question of jurisdiction comes in the way of adjudication under Section-4 (b)(i) which stipulates:-

(b) "no appeal shall lie to a tribunal against an order or decision of a departmental authority determining------(i) the fitness or otherwise of a person to be appointed to or hold a particular post or to be promoted to a higher post or grade".

We understand that the Provincial Selection Board met on 09.06.2020 to determine the fitness or otherwise of the officers on panel for consideration to be promoted to next higher scale i.e from BS-16 to BS-17 and scrutiny of the documents/service record was the prime and sole criteria before the PSB which the forum did take into consideration before making its recommendation to the competent authority for approval. **As this Tribunal is hit by the above mentioned provision of law, the service appeal in hand is therefore, dismissed."**

GROUNDS:

A. **Incorrect as laid**. The notification dated 02.07.2020 had been issued in pursuance of the recommendation of Provincial Selection Board (PSB) meeting held on 09.06.2020 wherein Tehsildars BS-16 were promoted as PMS-BS-17 in accordance with rules and Khyber Pakhtunkhwa Civil Servants Promotion Policy 2009 which states "*Promotion will always be notified with immediate effect"* **(Annex-II)**. *Moreover*, request of the petitioner for ante-dated promotion w.e.f 21.02.2020 instead of 02.07.2020 is contrary to the very spirit and objective of the policy ibid which says: *this Policy will apply to promotions of all civil servants holding appointment on regular basis and will come into effect immediately.*

B. **Incorrect, misperceived and misinterpreted.** As envisaged in Article 4 of the Constitution of Islamic Republic of Pakistan, 1973, all citizens are equal before law and entitled to equal protection of law. Likewise, Article 25 of the Constitution ensures equality amongst equal, and the appellant has been treated in accordance with prevailing Policy/Rules, therefore,

reference made to Articles 4 & 25 of the Constitution of the Islamic Republic of Pakistan is totally irrelevant.

C. **Incorrect and contrary to the facts.** The rest, as clarified vide Para-2, 4, 5 & 9 of the **"Facts"** and Para-A of the **"Grounds".**

D. **Incorrect, misperceived and misinterpreted.** As explained above, PSB meeting was scheduled on 20.02.2020 but was postponed due to the judgment passed by Peshawar High Court Peshawar dated: 19.02.2020, in writ petition No.5673-P/2019. As a result thereof, fresh working papers had to be prepared. Working out the new panels and the corresponding quotas of promotion due to retirements turned out to be a voluminous task. PSB was not re-scheduled untill 09.06.2020 as the Government of Khyber Pakhtunkhwa had declared emergency in wake of the escalation in the transmission of COVID-19 and had ordered closure of all the administrative departments except a few essential ones. These departments, being closed could not prepare the working papers.

E. **Incorrect, misperceived and misinterpreted.** The Provincial Selection Board is the competent forum for determination of eligibility of the panelists for their promotion to the next higher scale i.e., PMS (BPS-17), and that too, in accordance with law, rules and policy in vogue.

F. **Incorrect as laid.** The rest, as clarified vide Para-2, 4, 5 & 9 of the **"Facts"** and Para-A of the **"Grounds".**

G. **Incorrect, misperceived and misinterpreted.** Article 38(e) of the Constitution speaks of the collective responsibility of the state towards the people with regard to promotion of their social and economic well-being, and providing equal social protection to all citizens. Hence, reference made to Articles 38(e) of the Constitution is totally irrelevant.

H. That the Respondents also seek permission to raise further grounds at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the Parawise Comments, the instant Appeal may very graciously be dismissed with costs.

Secretary, Establishment Department
Khyber Pakhtunkhwa
(Respondent No. 2)

Senior Member Board of Revenue
Khyber Pakhtunkhwa
(Respondent No. 3)

Chief Secretary Khyber Pakhtunkhwa
(Respondent No.1)

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Amended Service Appeal: 11954/2020

Mr. Dil Nawaz Khan, Addl: Assistant Commissioner, Tangi, Charsadda.....**Appellant**

VERSUS

Chief Secretary Khyber Pakhtunkhwa & Others .....**Respondents**

AFFIDAVIT

I, Kaleem Ullah Baloch, Special Secretary Establishment Department do hereby solemnly affirm and declare on that oath contents of the accompanying parawise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal. It is further stated an oath that in this appeal the answering respondents have neither been place ex-party nor their defense has been struck off.

DEPONENT

Kaleem Ullah Baloch
Special Secretary Establishment
Contact: 0346-8858313

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(Judicial Wing)

AUTHORITY LETTER

Mr. Riaz Khan, Superintendent (Litigation-III Section) Establishment Department is hereby authorized to submit Affidavit to The Khyber Pakhtunkhwa Service Tribunal, Peshawar in Amended Service Appeal No. 11954/2020 titled as **"Dil Nawaz Khan VS GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS"** on behalf of The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa being (Respondents No.01)

Kaleem Ullah Baloch
Special Secretary
Establishment

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Annex-I

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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 12449/2020

Date of Institution ... 21.10.2020

Date of Decision ... 25.02.2021

Kifayatullah, Tehsildar, Peshawar. ... (Appellant)

VERSUS

The Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar and two others. ... (Respondents)

Present:

MR.KHALID REHMAN, Advocate --- For Appellant.

MR. MUHAMMAD RASHEED, Deputy District Attorney --- For respondents.

MR. MIAN MUHAMMAD --- MEMBER(Executive)

MR.HAMID FAROOQ DURRANI, --- CHAIRMAN

JUDGEMENT

MIAN MUHAMMAD, MEMBER(E):- The instant service appeal has been instituted under Section-4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974, against the impugned notification dated 02.07.2020 whereby the appellant stands deferred for promotion to PMS (BS-17) and the impugned appellate order dated 22.09.2020 vide which departmental appeal of the appellant was turned down.

FACTS.

02. Brief facts leading to the service appeal are that the appellant was initially appointed as Naib Tehsildar (BS-14) through Public Service Commission in 2009

Attested

Superintendent
Govt. of KPK
Estab: Deptt:

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

who was then promoted to the post of Tehsildar (BS-16) on 17.1.2019. The Provincial Selection Board in its meeting dated 09.06.2020 deferred the promotion case of the appellant on the ground that CPLA of the respondent departments was pending in the Apex court and his promotion will be decided after outcome of the CPLA. The appellant feeling aggrieved with the notification dated 02.07.2020, preferred departmental appeal which was rejected by the competent authority on 22.09.2020, hence, the instant service appeal before the Services Tribunal on 21.10.2020.

03. We have heard the arguments of learned counsel for the appellant as well as Deputy District Attorney for respondents and perused the record thoroughly.

ARGUMENTS.

04. Learned counsel for the appellant contended that Provincial Selection Board has made CPLA as basis for defernent of the appellant's promotion to higher post in BS-17 (PMS). Background of the CPLA is that the appellant had been removed from service on disciplinary proceedings and the Khyber Pakhtunkhwa Services Tribunal reinstated him in service through its judgement dated 20.11.2015 in service appeal No. 1099/2014 against which the respondent-department subsequently filed CPLA in the august Supreme Court of Pakistan and which is still pending there. It was further argued that the PSB could not convene its scheduled meeting on 20.02.2020 when the appellant was on the panel of officers for consideration to be promoted to BS-17 in Provincial Management Service. It was therefore not his fault and as such was eligible for promotion from that date due to availability of vacancy falling in quota reserved for promotion at that very point of time. As a result of not

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Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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Superintendent
Govt. of KPK
Estab: Deptt:

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convening meeting of the PSB, 123 direct recruitees in BS-17 (PMS) recommended by the Public Service Commission were notified on 29.05.2020 rendering the appellant to become junior to them. He pleaded that as per principle, vacancy in a cadre or service group will have to be filled from promotion quota first and then in direct or initial quota. He quoted Section-9 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-7(3) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 as well as para-V(a) of the Promotion Policy and submitted that deferment is recommended when inter-se-seniority is disputed/subjudice, disciplinary/departmental proceedings are pending or PER dossier of an officer is incomplete. The appellant was not hit by any of the category of deficiency and as such he was by all means eligible for promotion to BS-17. More so even in subsequent PSB meeting held on 09.06.2020 he was deferred on the ground that CPLA was pending in the Apex court and his earlier promotion as Tehsildar on 17.01.2019 was also conditional subject to the said CPLA. This is again an illegal and illogical ground and the appellant has been condemned unheard because no case of litigation could be held as a Bar to deprive him of promotion which is a vested right of the appellant. He quoted some other officers such as Fazal Hussain, Ghulam Habib, Atta Ur Rehman and Habib Arif etc who were recommended by the PSB despite the fact that their CPLA was pending before the Apex court at relevant point of time. To strengthen his arguments the learned counsel for the appellant placed reliance on order No. XX of Supreme Court Rules 1980, 1993 SCMR 2258, 2006 SCMR 1938 and 2010 PLC (C.S) 760.

05. Learned Deputy District Attorney, contrary to the arguments of learned counsel for the appellant, raised preliminary objection on maintainability of the

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Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Attested

Superintendent
Govt. of KPK
Estab: Deptt:

appeal under Section-4 (b)(i) and contended that determining the suitability of an officer for a particular post falls in the domain of DPC/PSB and as such the Services Tribunal has no jurisdiction on such issues to be adjudicated upon. It was further argued that the appellant has been promoted even to BS-16 as Tehsildar on 17.01.2019 on conditional basis because of pending CPLA in the august Supreme Court of Pakistan and second conditional promotion to BS-17 is not only unreasonable but also not covered under the relevant law, rules and promotion policy. He also raised objection on the contention of learned counsel for appellant with regard to the notification of direct recruitees dated 29.05.2020 mainly on the ground that it has neither been assailed nor impugned in the present memo of appeal. Similarly, 123 private respondents in notification dated 29.05.2020 have not been made party for the purpose of joinder and non-joinder and the service appeal has inner defects and liable to be dismissed even on ground of merits. Reliance was placed on case law reported as 2005 SCMR 1742, PLD 2008 Supreme Court 769..

CONCLUSION.

06. Without touching the facts, circumstances and merits of the case the question of jurisdiction comes in the way of adjudication under Section-4 (b)(i) which stipulates that:-

> (b)"no appeal shall lie to a Tribunal against an order or decision of a departmental authority determining---.
> (i) the fitness or otherwise of a person to be appointed to or hold a particular post or to be promoted to a higher post or grade.

We understand that the Provincial Selection Board met on 09.06.2020 to determine the fitness or otherwise of the officers on penal for consideration to be promoted to next higher scale i.e from BS-16 to BS-17 and scrutiny of the documents/service

Attested
Superintendent
Govt. of KPK
Estab: Deptt:

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal

35-A

record was the prime and sole criteria before the PSB which the forum did take into consideration before making its recommendations to the competent Authority for approval. As this Tribunal is hit by the above mentioned provision of law, the service Appeal in hand is therefore, dismissed. Parties are left to bear their respective costs. File be consigned to the record room.

ANNOUNCED
25.02.2021

(MIAN MUHAMMAD)
MEMBER(E)

(HAMID FAROOQ DURRANI)
CHAIRMAN

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 25/02/2021
Number of Words 2100
Copying Fee 26-00
Urgent —
Total 26-00
Name of Copyist —
Date of Completion of Copy 09-03-2021
Date of Delivery of Copy 09-03-2021

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Govt. of KPK
Estab: Deptt:

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Annex-II

V. Deferment of Promotion: 03468563429

(a) Promotion of a civil servant will be deferred, in addition to reasons given in para-IV, if

[249]Clause (i) [deleted]

(i) Disciplinary or departmental proceedings are pending against him.

(ii) The PER dossier is incomplete or any other document/ information required by the PSB/DPC for determining his suitability for promotion is not available for reasons beyond his control.

(b) The civil servant whose promotion has been deferred will be considered for promotion as soon as the reasons for deferment cease to exist. The cases falling under any of the above two categories, do not warrant proforma promotion but the civil servant will be considered for promotion after determining his correct seniority over the erstwhile juniors.

(c) If an officer is otherwise eligible for promotion but has been inadvertently omitted from consideration in the original reference due to clerical error or plain negligence and is superseded, he should be considered for promotion as soon as the mistake is noticed.

(d) If and when an officer, after his seniority has been correctly determined or after he has been exonerated of the charges or his PER dossier is complete, or his inadvertent omission for promotion comes to notice, is considered by the Provincial Selection Board/ Departmental Promotion Committee and is declared fit for promotion to the next higher basic scale, he shall be deemed to have been cleared for promotion alongwith the officers junior to him who were considered in the earlier meeting of the Provincial Selection Board/Departmental Promotion Committee. Such an officer, on his promotion will be allowed seniority in accordance with the proviso of sub-section (4) of Section 8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973,
whereby officers selected for promotion to a higher post in one batch on their promotion to the higher post are allowed to retain their inter-se-seniority in the lower post. In case, however, the date of continuous appointment of two or more officers in the lower post/grade is the same and there is no specific rule whereby their inter-se-seniority in the lower grade can be determined, the officer older in age shall be treated senior.

(e) If a civil servant is superseded he shall not be considered for promotion until he earns one PER for the ensuing one full year.

(f) If a civil servant is recommended for promotion to the higher basic scale/post by the PSB/DPC and the recommendations are not approved by the competent authority within a period of six months from such recommendations, they would lapse. The case of such civil servant would require placement before the PSB/DPC afresh.

VI. Date of Promotion:
Promotion will always be notified with immediate effect.

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[249] Clause(i) of sub para-a of Para-V deleted and ii,iii re-numbered as i,ii as well as in sub para-b the word three substituted with the word two vide Notification No.SO(Policy)/E&AD/1-16/2017 dated 05 12 2017

Attested
Superintendent
Govt. of KPK
Estab: Deptt:

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)/E&AD/Misc/2020
Dated Peshawar, the **December 24, 2020**

To

1. The Director STI, E&A Department.
2. All Additional Secretaries in E&AD.
3. All Deputy Secretaries in E&AD.
4. All Section Officers in E&AD.
5. The Estate Officer/Programme Officer (Computer Cell) in E&AD.

Subject: **SIGNING OF PARAWISE COMMENTS ETC IN SERVICE APPEALS.**

Dear Sir,

I am directed to refer to this Department letter No.SOR-VI/E&AD/1-23/2005 dated 12-01-2008 (copy enclosed) on the subject, the Competent Authority has been pleased to authorize the Special Secretary (Establishment) Establishment Department to sign the para-wise comments in cases of service appeals filed by the Civil Servants before the Khyber Pakhtunkhwa Service Tribunal on behalf of Chief Secretary, Khyber Pakhtunkhwa and Secretary, Establishment Khyber Pakhtunkhwa.

Yours faithfully,

SECTION OFFICER (POLICY)

ENDST: NO. & DATE EVEN

Copy forwarded to:

1. Secretary to Govt. of Khyber Pakhtunkhwa, Law Department
2. Registrar Peshawar High Court Peshawar.
3. Advocate General Khyber Pakhtunkhwa, Peshawar.
4. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
5. PS to Chief Secretary, Khyber Pakhtunkhwa
6. PS to Secretary Establishment, Khyber Pakhtunkhwa
7. PS to Special Secretary (Establishment) Establishment Department
8. PS to Special Secretary (Reg). Establishment Department.

SECTION OFFICER (POLICY)

Attested

Superintendent
Govt. of KPK
Estt: Deptt