


15.04.2024 1. Junior to counsel for the appellant present. Mr. Arshad Azam learned Assistant Advocate General for the respondents present.

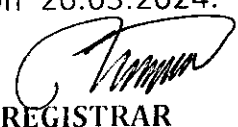

2. Notices to respondents not issued due to non deposit of TCS expenses. Appellant is directed to deposit TCS expenses within three days, thereafter notices be issued to the respondents for submission of written reply. To come up for written reply/comments on 07.05.2024 before S.B. P.P given to parties.

  
(Rashida Bano)  
Member (J)

Form-A  
FORM OF ORDERSHEET

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

Case No. 446/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26.03.2024	<p>As per direction of the Worthy Chairman the present appeal is fixed for preliminary hearing before Single Bench at Peshawar today i.e. on 26.03.2024.</p> <p> REGISTRAR</p>
26 <sup>th</sup> Mar. 2024		<p>1. Learned counsel for appellant present.</p> <p>2. He submitted that the appellant was aggrieved of the seniority list issued on 10<sup>th</sup> October, 2023 and has filed departmental appeal on 15.10.2023 which was not responded within statutory period of ninety days, hence, this appeal. The appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security fees within 10 days. The respondents be summoned through TCS/LCS, the expenses of which be deposited by the appellant within three days. To come up for reply/comments on 15.04.2024 before S.B.P.P given to the appellant.</p> <p>3. As to the application for interim relief, notice of the same be issued to the official respondents for the date fixed.</p> <p> (Kalim Arshad Khan) Chairman</p>

TCS Expenses  
Not Submitted  
8/4/24

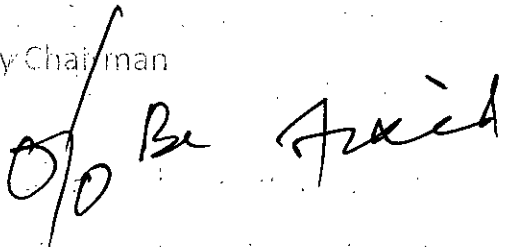
Respected Sir,

It is submitted that the present appeal was received on 14.02.2024, which was returned to the counsel for the appellant for removing objections (Flag-A). Today i.e. 22.02.2024 the learned counsel re-filed the appeal without removing the objections with reply (Flag-B).

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

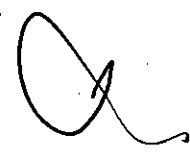
  
REGISTRAR

Worthy Chairman

  
20/3/24

26<sup>th</sup> Mar. 2024

1. Learned counsel for the appellant present.
2. When confronted as to what relief was sought by the appellant from respondents No.1 & 4, the learned counsel very fairly submitted that these two respondents were arrayed as respondents as abandoned precaution, however, requests that names of respondents No.1 & 4 might be deleted from the panel of respondents being unnecessary parties and that no relief was sought from either of the two. The office objection is decided accordingly. Office is directed to assign appeal number and again place before the undersigned today.

  
(Kalim Arshad Khan)  
Chairman

The appeal of Mr. Shakeel Ahmad received today i.e on 14 .02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no. 1, 2 & 4 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.
- 2- Appeal has not been flagged /marked with annexures marks.
- 3- Check list is not attached with the appeal.
- 4- Affidavit is not attested by the Oath Commissioner.
- 5- Annexures of the appeal are unattested.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal

No. 333 /S.J.

DC 15 /2 /2024.




REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Seadullah Khan Marwat Adv.  
High Court Peshawar.

Sro,

Re-submitted after removing the objections.

As far as objection No 1 is concerned. R. No. 1, 2 & 4 are necessary parties. Please put before the court.



22/2/24.

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**SCANNED  
KPKST  
PESHAWAR

S.A. No. \_\_\_\_\_ /2024

Shakel Ahmad

versus

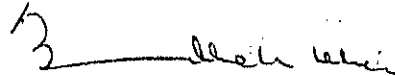
Director General &amp; Others

**I N D E X**

S. No.	Documents Descriptions	Annex	Page #
1	Memo of Appeal		1-6
2	Rules of 2019	"A"	7-18
3	Tentative Seniority List dated 15-09-2021	"B"	19-21
4	Objection	"C"	22-24
5	Seniority List vide covering letter dated 16-08-2022	"D"	25-27
6	Objection dated 29-08-2022	"E"	28-29
7	Final Seniority List dated 27-01-2023	"F"	30-32
8	Representation dated 17-03-2023	"G"	33
9	Tentative Seniority List	"H"	34-35
10	Committee Report	"I"	36-43
11	Tentative Seniority List dated 18-08-2023	"J"	44-52
12	Final Seniority List dated 10-10-2023	"K"	53-56
13	Representation	"L"	57
14	Application for Interim Relief		58-59

Appellant

Through

  
 Saadullah Khan Marwat  
 Advocate
21-A, Nasir Mansion,  
Shoba Bazaar, Peshawar

Dated 12-02-2024

Ph: 0300-5872676

**BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_\_/2024

Shakel Ahmad S/O Khurshid Ali,  
R/O Buner, Assistant Director,  
Provincial Headquarter, Govt. of  
KP, Sports, Tourism, Archeology,  
Museum of Youth Affairs Department,  
Peshawar, Presently Serving Regional  
Sports Officer Malakand at Swat . . . . . Appellant(s)

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11148

Dated 14-02-2024

**Verses**

1. Director General, Sports,  
Sports Complex, KP,  
Peshawar.
2. Chief Secretary, Govt. of  
KP, Peshawar.
3. Secretary Sports, KP,  
Peshawar.
4. Deputy Director, Sports,  
Sports Complex, KP,  
Peshawar.

5. Mst. Nazia Zaki, Assistant  
Director, Presently Serving  
As Deputy Director, Office of  
Director General, Sports  
Complex, KP, Peshawar.

6. Muhammad Ismail Khan,  
District Sports Officer,  
Lakki Marwat.

7. Tariq Muhammad, District  
Sports Officer, Swabi.

8. Asad Khan, Assistant Director,  
Peshawar Sports Complex.
9. Ahmad Zaman, District Sports  
Officer, Manshera,
10. Munir Abbas, District Sports  
Officer, Peshawar Sports Complex.
11. Kashif Farhan, Assistant Director,  
Peshawar Sports Complex.
12. Hazrat Ullah, District Sports  
Officer, Hangu.
13. Gul Rukh Gulfam, Assistant Director,  
District Sports Office, Peshawar Sports  
Complex . . . . . Respondent(s)

⇨<=>⇨<=>⇨<=>⇨<=>⇨

**APPEAL UNDER SECTION 4 OF THE SERVICE  
TRIBUNAL ACT, 1974 AGAINST FINAL  
SENIORITY LIST ISSUED VIDE NOTIFICATION  
DATED 10-10-2023 STOOD ON 18-08-2022 AND  
REPRESENTATION DATED 15-10-2023 NOT  
HONORED TILL DATE.**

⇨<=>⇨<=>⇨<=>⇨<=>⇨=

**Respected Sir:**

1. That appellant initially inducted in the department in the year 2008 and lastly promoted to the post of Assistant Director from the post of Budget and Account Officer B-16 through DPC / PSB on 28-05-2019.
2. That department maintain combine seniority list of Assistant Director, District Sports Officer and Administrators B-17 according to the rules of 2019 as all these posts having same cadre / grade in the department. (Copy as annex "A")

3. That the department issued Tentative Seniority List for the year 2021 stand on 15-09-2021, issued vide covering letter dated 15-09-2021 inviting objections from the concerned officials within 15 days positively. Here it is to be pointed out that officials from S. No. 09 to 16 who were not regularly promoted through DPC but only upgraded were placed senior to appellant whereas appellant was placed at S. No. 19 of the seniority list in violation of law and as he was regularly promoted through DPC / PSB. (Copy as annex "B")
4. That appellant preferred objection on proforma to the respondents on the ground that the official from S. No. 09 to 16 has not been promoted to the post of District Sports Officer B-17 on the recommendation of DPC but upgradation of the post that too only post is upgraded and the post was not upgraded along with incumbents but in vain. (Copy as Annex "C")
5. That on 16-08-2022, the same Tentative Seniority List which was issued on 15-09-2021 was again issued vide covering letter dated 16-08-2022 on which the appellant filed objection on 29-08-2022 but in vain / not respond / not considered. (Copies as Annex "D" & "E")
6. That on 27-01-2023, the department issued Final Seniority List stood on 18-01-2023 but without circulating the same among the concerned officials and was kept in dark from the appellant and other officials, the same seniority list was got from the office on 08-03-2023, here it is to be noted that in the seniority list R. No. 06 to 13 who were only upgraded and not regularly promoted was made senior to appellant whereas appellant who was regularly promoted as Assistant Director on the recommendation of DPC / PSB in the year 2019 he was placed at S. No. 17 against the law and rules and thereafter the appellant preferred departmental appeal to R. No. 02 on 17-03-2023 which is not responded with in the statutory period of three months. (Copies as annex "F" & "G")
7. That the appellant preferred Service Appeal No. 1365/2023 on 17-06-2023 before this hon'ble Tribunal wherein reply was also submitted by the official as well as by the private respondents but astonishingly the department Issued another Final Seniority List dated



10-10-2023 stood on 18-10-2023 in violation of all rules and law on the subject wherein R. No. 05 was figured at S. No. 01, in spite of the fact that R. No. 05 is the basic employee of Education Department FATA and no merger of FATA Education Department has been affected with the Sports Department KPK till date besides previously R. No. 05 was illegally inserted in the Seniority List of 2021 upon which the employee of Sports Department preferred objection after which a Committee was constituted which recommended that the R. No. 05 be removed from the Seniority List of 2022 as no merger of Education FATA has been effected with Sports Department and resultantly the R. No. 05 was removed from Tentative Seniority List and Seniority List of incumbents was issued wherein the R. No. 05 was not included and thereafter final Seniority List stood on 18-01-2023 was issued by not including the R. No. 05. (Copies of Tentative Seniority List and Committee Report as annex "H" & "I")

8. That to the utter surprise of the appellant, the respondent department during the pendency of Appeal No. 1365 / 23 issued Tentative Seniority List dated 18-08-2023 by figuring R. No. 05 at S. No. 01 on which the appellant preferred objection but not replied where after the department issued Final Seniority List on 10-10-2023 stood on 18-08-2023 wherein the R. No. 05 was figured at S. No. 01 in violation seniority, law and rules on the subject. (Copies as annex "J" & "K")
9. That the appellant preferred departmental appeal on the Final Seniority List issued on 10-10-2023 stood on 18-08-2023 wherein the comments of Directorate was called which furnished the comments seconding the plea of appellant but till date the representation of appellant was not responded. (Copy as annex "L")
10. That the department might affect further promotions on the disputed and illegal Seniority List which will affect the future of appellant.

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

**GROUND S.**


- a. That R. No. 05 is illegally inserted in the Seniority List whereas R. No. 06 to 13 has not been regularly promoted and only upgraded so has no right of seniority over the appellant who is regularly promoted on the recommendation of DPC / PSB to the post / cadre of Assistant Director B-17.
- b. That upgradation of a post is only meant for monetary benefits having no right of seniority over the officials who are regularly promoted.
- c. That even if R. No. 05 is included in Sports Department even then she will be placed at the bottom of Seniority List as per law and judgments of the superior courts.
- d. That the department violated the judgments of the superior court by issued Seniority List during the pendency of the appeal wherein Seniority List dated 18-01-2023 has been challenged and department is pursuing the same.
- e. That appellant has every right to be placed above R. No. 05-13 on the basis of regular promotion to the post / cadre of Assistant Director B-17.
- f. That the department / official respondents are legally bound to draw seniority list according to law and rules on the subject.
- g. That by drawing wrong seniority list of the incumbents of the department the respondents are trying to deprive the appellant from further promotion which is right of the appellant according to law and rules on the subject.
- h. That charge on the upgraded post does not give right of seniority over the incumbents who are regularly promoted on the recommendation of PSB / DPC.
- i. That the rules provides for promotion and not upgradation to the promotion post / vacancy. So upgradation in no way give right of seniority to the particular incumbents who are only upgraded.
- j. That the superior courts has drawn distinction between promotion and upgradation in many many judgments clarifying the position.

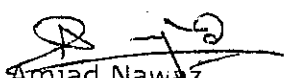
It is, therefore, most humbly prayed that on acceptance of the appeal, the Seniority List stood on 18-08-2023 issued on 10-10-2023 be modified and R. No. 05 to 13 be excluded from the same and appellant be placed at S. No. 09 above the name of Hamid Ali and below the name of Amjid Iqbal with all back / service / consequential benefits in the interest of justice..

  
Appellant

Through

  
Saadullah Khan Marwat

  
Arbab Saiful Kamal

  
Amjad Nawaz

Advocates

Dated: 12-02-2024

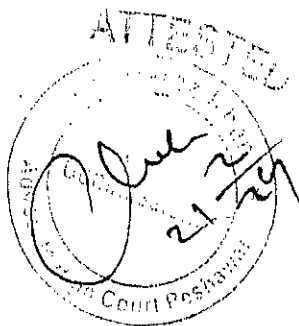
### CERTIFICATE:

As per instructions of my client, no such like appeal has been earlier filed by the appellant before this Hon'ble Tribunal.

  
Advocate

### AFFIDAVIT

I, Shakeel Ahmad (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



  
DEPONENT

Rules

A



GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS & YOUTH AFFAIRS DEPARTMENT

Page 1 of 12

Dated Peshawar, the 29/04/2019

**NOTIFICATION**

No. SO/Sport/1-8/2019/S. Rules. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous notifications issued in this behalf, the Sports, Culture, Tourism, Youth Affairs, Archaeology and Museums Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualifications and other conditions specified in Column Nos. 3 to 5 of the Appendix to this Notification which shall be applicable to the posts in the Directorate General of Sports, as specified in Column No. 2 of the said Appendix:

**APPENDIX**

S.No.	Nomenclature of post.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	Director General (BPS-20).	3.	4.	5. By promotion on the basis of seniority-cum-fitness from amongst the Directors (BPS-19), having two (2) years service in BPS-19 and seven (7) years service in BPS-17 and above. Provided that if no suitable officer is available for promotion then by transfer from amongst the PAS PAISAFES officers.

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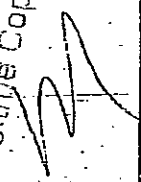
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	Director (BPS-19).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors (BPS-18) and Regional Sports Officers (BPS-18) having seven(07) years' service as such or twelve(12) years' service in BPS-17 and above.</p> <p>Note: For the purpose of promotion, a joint seniority list of Deputy Directors and Regional Sports Officers shall be maintained.</p>
3.	Deputy Director / Regional Sports Officer (BPS-18).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Assistant Directors (BPS-17), District Sports Officers (BPS-17) and Administrators (BPS-17), having five years' service as such.</p> <p>Note: For the purpose of promotion, a joint seniority list of the Assistant Directors, District Sports Officers and Administrators shall be maintained.</p>
4.	Chief Coach (BPS-18).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Coaches (BPS-17), having five years service as such.</p>
5.	Assistant Director (BPS-17).	At least Second Class Master's Degree or BS(4 years) in Social Sciences, Management Science, Sports Sciences or its equivalent qualification from a recognized University.	22 to 35 years.	<p>(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents (BPS-17), with two years service as such;</p> <p>(b) ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Budget and Accounts Officers (BPS-16), with two years service as such; and</p> <p>(c) Fifty per cent by initial recruitment.</p>

W. M. S. C.  
29.07.2019  
S. A. S. H. S. A.

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6.	District Sports Officer (BPS-17)	At least Second Class Master's Degree or BS (4 years) in Social Sciences, Management Science, Sports Sciences or its equivalent qualification from a recognized University.	22 to 35 years.	By initial recruitment.
7.	Administrator (BPS-17)	At least Second Class Master's Degree or BS (04 years) in Business Administration, Public Administration, Sports Sciences or its equivalent qualification from a recognized University.	22 to 35 years.	(a) Ten per cent by promotion, on the basis of seniority cum-fitness, from amongst the Manager-cum-Groundmen (BPS-16) with five years service as such; and (b) ninety per cent by initial recruitment.
8.	Senior Coaches (BPS-17)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with five (5) years' experience as Coach in the relevant games before or after Graduation as recognized by the Directorate General of Sports with:  (a) at least second position in the relevant individual sports event as a player at the National level, organized by Pakistan Olympic Association, Pakistan Sports Federation concerned or Pakistan Sports Board; or  (b) participation as a team member as a playing player in the relevant National level sports competition, organized by Pakistan Olympic Association, Pakistan Sports Federation concerned or Pakistan Sports Board and team secured at least Second position.  Note: Preference shall be given to International sports person in the relevant field.	22 to 40 years.	(a) Seventy per cent by promotion, on the basis of seniority cum-fitness, from amongst Coaches (BPS-16) with at least three years service as such; and (b) thirty per cent by initial recruitment.

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9.	Doctor (BPS-17)			By transfer of a suitable Doctor from the Health Department of Government.
10.	Physiotherapist (BPS-17)			By transfer of a suitable Physiotherapist from the Health Department of Government.
11.	Superintendent (BPS-17)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants (BPS-16) and Senior Scale Stenographers (BPS-16), with five years service as such.  Provided that if no suitable official is available for promotion then by transfer from any Government Department.  Note: For the purpose of promotion, a joint seniority list of Assistants and Senior Scale Stenographers shall be maintained.
12.	Coaches (BPS-16)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with two (2) years' experience as Coach in the relevant games before or after Graduation as recognized by the Directorate General of Sports.  (a) at least second position in the relevant individual sports event as a player at the National level, organized by Pakistan Olympic Association or Pakistan Sports Federation; or  (b) participation as a team member or a playing player in the relevant National level sports competition.	20 to 40 years.	(a) Sixty per cent by promotion on the basis of seniority-cum-fitness, from amongst Junior Squash Coaches (BPS-10) and Junior Coaches (BPS-10) with at least two years services as such; and  (b) forty per cent by initial recruitment.  Note: For the purpose of promotion, a joint seniority list of Junior Squash Coaches and Junior Coaches shall be maintained.

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✓  
 M. M. H. Q. C.  
 (BPS-16/17)  
 S. A. T. O. M. A. S. I. A.

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		organized by Pakistan Olympic Association or Pakistan Sports Federation and team secured at least second position.  Note: Preference shall be given to International sports person in the relevant field.		
13.	Manager-cum-Groundman (BPS-16).	(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with participation in any National level Cricket tournament as a playing player and having at least three years experience in office management or administration; or  (b) at least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with Diploma in Physical Education and participation in the Inter University or Inter Board competitions as a Cricket player.	20 to 32 years.	(a) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Supervisors (BPS-15) with five years' service as such; and  (b) seventy-five per cent by initial recruitment.
14.	Budget and Accounts Officer (BPS-16).	At least Second Class Master's Degree or BS- (04 years) in Business Administration (Finance), Commerce (Accounts) or its equivalent qualification from a recognized University.	22 to 32 years.	By initial recruitment.

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15. Senior Scale Stenographer (BPS-16)		20 to 32 years	By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers (BPS-14) with at least five years service as such.  Provided that if no suitable person is available for promotion then by transfer from any Government Department.
16. Assistant (BPS-16)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University.	18 to 30 years	(a) Seventy-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks (DPS-14) with at least five years service as Junior Clerk and Senior Clerk; and (b) twenty-five per cent by initial recruitment.
17. Computer Operator (BPS-16)	(a) At least Second Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years) or its equivalent qualification from a recognized University; or (b) at least Second Class Bachelor's Degree or its equivalent qualification, from a recognized University with one year Diploma in Information Technology or its equivalent qualification, from a recognized Board of Technical Education.	18 to 28 years	By initial recruitment.

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BANGALORE  
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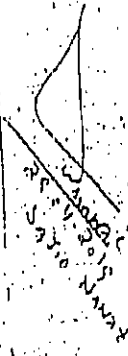
18.	Supervisor (BPS-15).	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with Junior Diploma in Physical Education.	20 to 32 years.	(a) Ten per cent by promotion on the basis of seniority-cum-fitness from amongst the Hostel Superintendents (BPS-10) with three (03) years service as such; and  (b) ninety per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Caretakers (BPS-08) and Store Keepers (BPS-08) with two (02) years service as such.  Note: For the purpose of promotion, a joint seniority list of Care Takers and Store Keepers shall be maintained.
19.	Stenographer (BPS-14).	(a) At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with  (b) speed of fifty (50) words per minute in shorthand in English and thirty-five (35) words per minute in typing; and  (c) knowledge of Computer in using MS Word and MS Excel.	18 to 30 years.	By initial recruitment.
20.	Senior Clerk (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks (BPS-11) with at least two years service as such.
21.	Junior Clerk (BPS-11).	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids (BPS-05), Chowkidars (BPS-03), Security Guards (BPS-03), Watchmen (BPS-03), Malies (BPS-05), Ground-men (BPS-03), Cleaners (BPS-05), Conductors (BPS-03) including holders of other equivalent posts in the Directorate General of Sports.

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22 Junior Squash Coach/Junior Coach (MPS-10)	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with three (3) years' experience as Coach in the relevant games before or after Secondary School Certificate and	25 to 40 years	By initial recruitment.  
			<p>(b) sixty-seven per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, a joint seniority list of Naito Qasids, Chowkidars, Security Guards, Watchmen, Males, Ground-men, Cleaners, Conductors including holders of other equivalent posts in the Directorate General of Sports shall be maintained.</p> <p>Provided that if two or more officials have acquired the Intermediate Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post and where a senior official does not possess the requisite qualification at the time of filling of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p> <p>Provided further that where a senior official does not possess the requisite qualification at the time of filling of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>

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23. Hostel Superintendent (BPS-10)	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years' experience in the relevant field.	18 to 30 years.	By initial recruitment.
24. Care Taker / Store Keeper (BPS-08)	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board.	25 to 35 years.	(a) Twenty per cent. by promotion, on the basis of seniority-cum-fitness, from amongst Tube Well Operators (BPS-05), Wood Workers (BPS-05), Electrician (BPS-05) and Plumber (BPS-05) with three (03) years' service as such.

تعمیر کار / ذخیرہ نگار (بپس-08)

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*[Signature]*

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				<p>(b) fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Electricians (BPS-03), Plumbers (BPS-03), Tube-Well Operators (BPS-03) and Generator Operators (BPS-03), with three years' service as such; and</p> <p>(c) thirty per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, joint-seniority lists of Tube Well Operators (BPS-05), Wood Workers (BPS-05), Electricians (BPS-05) and Plumbers (BPS-05), and Electrician (BPS-03), Plumber (BPS-03), Tube-Well Operator (BPS-03) and Generator Operators (BPS-03), shall respectively be maintained.</p>
25.	Driver (BPS-6).	Literate having valid Light Transport Vehicle driving license issued by the competent authority.	18 to 40 years.	By initial recruitment.
		Provided that preference shall be given to those who have vast experience in driving, repair and maintenance of vehicles.		
26.	Tube Well Operator/ Wood Worker/ Electrician (BPS-5).	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years practical experience in the relevant field.	18 to 40 years.	By initial recruitment.

Examined with Commissioner

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27	Life Guard (BPS-04)	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with participation in at least at the District level swimming competitions.	18 to 40 years	By initial recruitment
28	Electrician / Plumber / Generator Operator (BPS-03)	Certificate from a recognized technical institution in the relevant field with two years practical experience.	18 to 40 years	By initial recruitment
29	Tube Well Operator (BPS-03)	At least Middle passed from a recognized Board.	18 to 40 years	By initial recruitment
30	Naib Qasid (BPS-03)	Proficiency literate.	18 to 40 years	By initial recruitment
31	Chowkidar/Security Guard/ Watchman Cleaner (BPS-03)	Literate with sound physique, having two years relevant experience.	18 to 40 years	By initial recruitment
32	Mali/ Ground-man (BPS-3)	Literate with two years relevant working experience.	18 to 40 years	By initial recruitment

*29/04/2015  
29/04/2015  
29/04/2015*

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33.	Conductor (BPS-03).	Preferably literate.	18 to 40 years.	By initial recruitment.
34.	Sweeper (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.

18

sd/-  
 Secretary to Government of Khyber Pakhtunkhwa  
 Sports, Tourism, Archaeology, Museums &  
 Youth Affairs Department

Endst: No. No.SO(Sports)-3/2019/6.Rules:

Dated Peshawar, the 29/01/2019

Copy forwarded to the-

- 1) All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 2) Secretary to Governor Khyber Pakhtunkhwa.
- 3) Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
- 4) Accountant General Khyber Pakhtunkhwa.
- 5) Director General Sports, Khyber Pakhtunkhwa Peshawar.
- 6) Secretary Public Service Commission Khyber Pakhtunkhwa Peshawar.
- 7) Registrar Peshawar High Court / Service Tribunal Peshawar.
- 8) All Regional Sports Officers / District Sports Officers, Khyber Pakhtunkhwa.
- 9) Manager Government Stationary & Printing Department.
- 10) PS to Chief Secretary Khyber Pakhtunkhwa Province.
- 11) PS to Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 12) PA to Additional Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 13) Office Order File.

Sajid Nawaz  
 29-01-2019  
 (Sajid Nawaz)  
 Section Officer Sports

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Sports are essential for the development of a happy, healthy & vigorous society.

## DIRECTORATE GENERAL OF SPORTS

KHYBER PAKHTUNKHWA  
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.  
Ph: # 9212787, Fax # 9212788

No. 17/Seniority List/2021

Dated 15-09-2021

To,

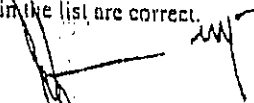
- 1- All Regional Sports Offices in Khyber Pakhtunkhwa
- 2- All Assistant Directors o/o DG Sports Khyber Pakhtunkhwa.
- 3- Assistant Director o/o Director Sports (merged areas).
- 4- All District Sports Officers in Khyber Pakhtunkhwa.
- 5- All Administrators o/o DG Sports Khyber Pakhtunkhwa.

Subject: TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA FOR THE YEAR 2021.

Kindly refer to the subject noted above and to forward herewith a copy of Tentative Seniority list of Assistant Directors, Administrators and District Sports Officers (BPS-17) of the Directorate General of Sports Khyber Pakhtunkhwa for the year 2021 along with certificate proforma for perusal and intimation of objection / observation, if any. The tentative seniority list issued in pursuance of the Sports Department Notification No. SO(Sports)1-41/2020/2912-16, dated 10<sup>th</sup> September 2021.


2. Incorrect entry in service particulars or objection / observations on the list may be furnished on the enclosed proforma supported by attested photocopies of relevant documents within 15 days positively, otherwise, it will be presumed that entries made in the list are correct.

Encl: As above.

  
DIRECTOR GENERAL

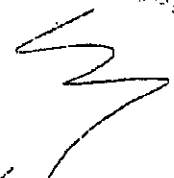
Copy forwarded to the: -

- 1- Secretary to Govt of Khyber Pakhtunkhwa, Sports and Youth Affairs Department.
- 2- Director Sports (merged areas), Peshawar.

  
DIRECTOR GENERAL

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TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA (AS STOOD ON 15-09-2021)

S.#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 <sup>st</sup> Entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
1)	Ms. Nadeem Zaki	M.A.	05-06-1986	Kurram	09-09-2013	09-09-2013	17	Regular appointment	Assistant Director	Appointed in the erstwhile FATA Sports Directorate
2)	Mr. Sikandar Shah Regional Sports Officer (a.e.b)	M.Sc.	25-04-1963	Kohat	04-06-1991	24-04-2019	18 (a.e.b)	By promotion	RSO (a.e.b)	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis.
3)	Muhammad Jamshid (District Sports Officer)	M.Sc.	05-05-1978	D.I.Khan	01-01-2005	20-12-2017	17	By promotion	DSO	Working as RSO Peshawar in OPS
4)	Muhammad Sulman (District Sports Officer)	M.Sc.	01-04-1971	Dir	06-06-1990	20-12-2017	17	By promotion	DSO	DSO Buner
5)	Mr. Anwar Kamal (District Sports Officer)	B.A	27-03-1975	D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO	Working as RSO Bannu in OPS
6)	Mr. Amir Zahid Shah (District Sports Officer)	M.Sc.	05-09-1967	Bannu	29-06-1992	20-12-2017	17	By promotion	DSO	DSO Karak
7)	Mr. Zakir Ullah (District Sports Officer)	M.A/M.Sc.	22-04-1977	Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO	Working against the post of Assistant Director
8)	Mr. Razi Ullah Khan (District Sports Officer)	M.Sc.	01-10-1979	Tank	02-09-2002	20-12-2017	17	By promotion	DSO	Working as RSO DIKhan in OPS
9)	Muhammad Ismail Khan (District Sports Officer)	M.Sc.	02-06-1977	Bannu	19-06-2005	08-03-2018	17	By Upgradation	DSO	DSO-Lakki Marwat
10)	Mr. Tariq Muhammad (District Sports Officer)	M.Sc.	22-10-1972	Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO	DSO Swabi
11)	Mr. Asad Khan (District Sports Officer)	M.A.	20-05-1968	Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO	Working against the post of Assistant Director
12)	Mr. Ahmad Zaman (District Sports Officer)	M.Sc.	30-04-1980	Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO	DSO Manshera
13)	Mr. Munir Abbas (District Sports Officer)	MBA	12-3-1984	Hangu	09-05-2006	08-03-2018	17	By Upgradation	DSO	On Deputation to Tourism & Culture Authority

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Handwritten notes and date: 15/09/2021

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S#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 <sup>st</sup> Entry into Govt. Service	Regular appointment/promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
14)	Kashif Farhan (District Sports Officer)	M.Phil	15-04-1954	Bannu	31-08-2017	08-05-2018	17	By Upgradation	DSO	DSO Swat
15)	Hazrat Ullah (District Sports Officer)	MS	01-01-1964	Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Hangu
16)	Gul Rukh Gulfam (District Sports Officer)	M.Sc	01-06-1991	Abbotabad	29-09-2017	05-03-2018	17	By Upgradation	DSO	DSO Haripur
17)	Aanjad Iqbal, Assistant Director, Provincial HQ	MSc Botany (Gold Medalist)	19-6-1967	Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director	Assistant Director (Acctt.)
18)	Shakeel Ahmad, Assistant Director, Provincial HQ	M.A.	04-1-1971	Bunir	18-1-2008	28-05-2019	17	By Promotion	Assistant Director	Assistant Director

Sanctioned with Commissioner.

HC

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To,

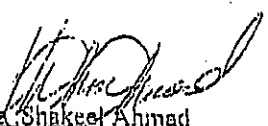
Date: 201-17 / Seniority List  
28/9/21  
Dated Peshawar the 28<sup>th</sup> September, 2021

The Director General Sports,  
Khyber Pakhtunkhwa, Peshawar.

Subject:- OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATOR BPS-17, DIRECTORATE GENERAL SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2021

Dear Sir,

Kindly refer to your good office letter No. 17/seniority list /2021 dated 15-09-2021 on the subject noted above and to submit herewith observations / objections regarding my seniority position for favorable action.

  
Name: Shakeel Ahmed  
Designation: Assistant Director (Lit)  
Dated Peshawar the 28<sup>th</sup> September, 2021

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Clerks & Junior Clerks have been given, which is irrelevant because the positions in said categories is the similar / same as explained in para 3 above.

Cont: Page-2

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CERTIFICATE

Subject:- OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATOR BPS-17, DIRECTORATE GENERAL SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2021

Dear Sir,

It is certified that I have gone through my particulars mentioned in Serial No. 18 of the tentative seniority list of Assistant Directors, District Sports Officers and Administrator BPS-17 and found them correct, except the following columns:-

S.No.	Column No.	Present entry	To be replaced by (attached copy, if any)	Remarks
1.	1.	18	09	As per given reason / justifications

The following discrepancies are also brought into the notice:-

1. The notification No. SO (Sport) 1-41/2020/2913-6 dated 10-09-2021, is against the procedure / format laid down in the Manual of Secretariat Instructions as it relate to the clarification of objections raised on seniority position by the affected. It was required to be issued in the form of letter and not in the shape of notification.
2. In sub Para 1 of Para 7 of the Sport Department notification No. SO (Sport) 1-41/2020/2913-6 dated 10-09-2021 it has been stated that Mr. Amjid Iqbal & Shakeel Ahmed were adjusted as Assistant (BPS-14) after being declared surplus. It is clarified that I was not adjusted from the Surplus Pool but appointed through initial recruitment by the District Government on 18-01-2008 (Copy of the order is attached). (Annexure-A)
3. In sub Para 2 of para 7 of the said notification it is stated that Mr. Amjid Iqbal and Shakeel Ahmed assumed charge on the upgraded posts of Assistant and no DPC was held. In this regard it is pointed out that in the notification of the Up-gradation of the scale of the post of Assistant from BPS-14 to BPS-16 it is clearly mentioned that the pay scale of the post of Assistant was upgraded with incumbents throughout the Province with the directions that the pay of all the incumbents of the posts of Assistant throughout the Province shall be fixed in the upgraded Pay scale without holding DPC as it was up-gradation of scale and not up-gradation of the posts. Thus there was no need to place the matter before DPC (copy attached). (Annexure-B)  
The posts of Deputy District Sports Officers BPS-16 have been up-graded to the Posts of District Sports Officers BPS-17 without incumbents of the posts for which DPC is necessary as per laid down procedure (copy attached). (Annexure-C)
4. In sub para 3 of the said notification reference of superintendent, Assistants, Senior Clerks & Junior Clerks have been given, which is irrelevant because the positions of the said categories is the similar / same as explained in para 3 above.

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5. In sub-Para 4 of the said notification it is stated that in light of WP No 428-P/2012 Peshawar High Court Peshawar judgment announced on 19-06-2013, Finance Department upgraded the post of Computer Operator in all the Departments / Offices of the Khyber Pakhtunkhwa and the incumbents took the charge without DPC / seniority .In this regard it is clarified that in the said notification of Finance Department clearly mentioned that the Pay of the incumbents will be fixed in the next higher Pay scale. As such there was no need of DPC. But in the case of Deputy District Sports Officers and District Sports Officers no such clarification was issued by the Finance Department (Copy attached). (Annexure-D)

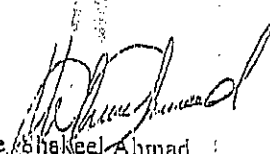
6. In sub-Para 7 of the said Notification it is stated that in the joint seniority list for promotion to the posts of Deputy Directors / Regional Sports Officers (BPS-18) Mr. Amjad Iqbal & Shakeel Ahmad had to be in the list of Assistant Directors (BPS-17) for being eligible to be in the list. Both the officers entered in to the list on 28-05-2019 while other officers on 08-03-2018.

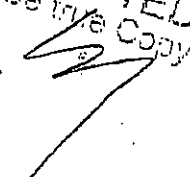
In this regard it is stated that Mr. Amjad Iqbal & Shakeel Ahmad entered in to seniority list of Assistant Directors for Promotion to the post Deputy Directors / Regional Sports Officers through legal and regular process of DPC while the others officers (District Sports Officers) only took charge and avail all benefits of BPS-17 illegally because after the up-gradation of the posts of Deputy Districts Sports Officers BPS-16 to District Sports Officers BPS-17 DPC was required but no DPC was held for the up-graded post of Deputy Districts Sports Officers BPS-16 to District Sports Officers BPS-17.

In View of the above submission it is clear that the District Sport Officers in the Seniority List from No.9 to 16 are still BPS -16 and availing all benefits of BPS -17 without any legal procedure and they are still junior to me because I was promoted regularly through legal process of DPC on 28-05-2019.

Keeping in view the above clarification / justifications it is requested that necessary correction in the seniority list may kindly be made and my due right may be given to me.

Your's faithfully

  
Name: Shakeel Ahmad  
Designation: Assistant Director (Lit)  
Dated Peshawar the 28<sup>th</sup> September, 2021

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DIRECTOR GENERAL, SPORTS AND  
RECREATION

1. Asst. Dir. (Sports) - Bangalore
2. Asst. Dir. (Sports) - Mysore
3. Asst. Dir. (Sports) - Coimbatore
4. Asst. Admin. Officer - Mysore

CONFIDENTIAL - LIST OF ASSISTANT DIRECTORS OF  
SPORTS OFFICERS AND ADMINISTRATORS -  
GENERAL DEPARTMENT

Kindly refer to the report submitted to the Government of Karnataka by the  
Director General of Sports, District Sports Officers and Administrators of the  
Directorate General of Sports, Mysore District along with the certificate of  
and intention of objection (if any) to the tentative list of  
of Establishment Department Letter No. SOR-158/2014-1/2015 Dated 27.11.2014

2. Incorrect entry in service particulars of objects of reference  
furnished on the enclosed project supported by the  
5 days positive clearance, if any, is required in the  
of Establishment Department Letter No. SOR-158/2014-1/2015 Dated 27.11.2014

Encl: As above.

*[Signature]*  
DIRECTOR GENERAL

Copy forwarded for information to:-

1. The Section Officer (Sports), Dept. of Youth & Sports, Government of Karnataka,  
Bangalore - 560022 (Tel: 22223107-11 Fax: 22223107)
2. Director Sports (Merged Area) - Mysore

DIRECTOR GENERAL

*[Handwritten mark]*

(2)

**TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA (AS STOOD ON 15-09-2021)**

S.#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 <sup>st</sup> Entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
1)	Mr. Maria Zakki	M.A.	05-06-1986	Kurram	09-09-2013	09-09-2013	17	Regularization	Assistant Director	Appointed in the erstwhile PATA Sports Directorate
2)	Mr. Sikandar Shah (Regional Sports Officer (a.c.b))	M.Sc.	25-04-1963	Kohat	04-06-1991	24-04-2019	18 (a.c.b)	By promotion	RSQ (a.c.b)	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis.
3)	Muhammad Janshid (District Sports Officer)	M.Sc.	05-05-1976	D.I.Khan	01-01-2005	26-12-2017	17	By promotion	DSO	Working as RSO Peshawar in OPS
4)	Muhammad Saleman (District Sports Officer)	M.Sc.	01-04-1971	Dir	06-06-1990	20-12-2017	17	By promotion	DSO	DSO Buner
5)	Mr. Anwar Kamal (District Sports Officer)	B.A.	27-03-1975	D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO	Working as RSO Bannu in OPS
6)	Mr. Amir Zahid Shah (District Sports Officer)	M.Sc.	05-09-1967	Bannu	29-06-1992	20-12-2017	17	By promotion	DSO	DSO Karak
7)	Mr. Zakir Ullah (District Sports Officer)	M.A/M.Sc.	22-04-1977	Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO	Working against the post of Assistant Director
8)	Mr. Razi Ullah Khan (District Sports Officer)	M.Sc.	01-10-1979	Tank	02-09-2002	20-12-2017	17	By promotion	DSO	Working as RSO DIKhan in OPS
9)	Muhammad Ismail Khan (District Sports Officer)	M.Sc.	02-06-1977	Bannu	19-06-2005	08-03-2018	17	By Upgradation	DSO	DSO Lakki Marwat
10)	Mr. Tariq Muhammad (District Sports Officer)	M.Sc.	22-10-1972	Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO	DSO Swabi
11)	Mr. Asad Khan (District Sports Officer)	M.A.	20-05-1968	Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO	Working against the post of Assistant Director
12)	Mr. Ahmad Zaman (District Sports Officer)	M.Sc.	30-04-1980	Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO	DSO Manshra
13)	Mr. Munir Abbas (District Sports Officer)	MBA	12-3-1984	Hangu	09-05-2006	08-03-2018	17	By Upgradation	DSO	On Deputation to Tourism & Culture Authority

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S#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 <sup>st</sup> Entry into Govt. Service	Regular appointment/promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
14)	Kashif Farhan (District Sports Officer)	M.Phil	15-04-1984	Banna	31-08-2017	05-03-2018	17	By Upgradation	DSO	DSO Swat
15)	Hazrat Ullah (District Sports Officer)	MS	01-01-1984	Karah	01-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Hangu
16)	Gul Raah Gulfam (District Sports Officer)	M.Sc	01-06-1991	Abbottabad	29-09-2017	06-03-2018	17	By Upgradation	DSO	DSO Haripur
17)	Ainjad Iqbal, Assistant Director, Provincial HQ	MSc Botany (Gold Medalist)	19-6-1967	Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director	Assistant Director (Acft)
18)	Shakeel Ahmad, Assistant Director, Provincial HQ	M.A.	04-1-1971	Bunir	16-1-2008	28-05-2019	17	By Promotion	Assistant Director	Assistant Director

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To

The Director General of Sports  
Khyber Pakhtunkhwa Peshawar

1040-17/S List  
30/8/22

SUBJECT:-

OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICTS SPORTS OFFICERS AND AMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2022.

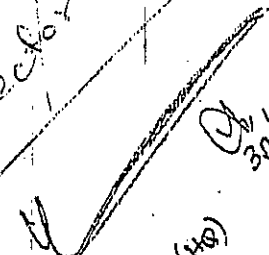
Dear Sir,

Kindly refer to your good office letter No 17/Seniory list/2022 dated 16/08/2022 on the subject noted above and to submit here with observations/objection regarding my seniory position for favorable action.

  
(Signature)

Assistant Director (BPS-17)

Dated:- 29-08-2022

Director (Ops)  
  
AD (Ho) 30/8

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CERTIFICATE

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SUBJECT:-

OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICTS SPORTS OFFICERS AND AMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2022.

It is certified that I have gone through my particulars mentioned at Serial No. 18 of the tentative seniority list of Assistant Directors, Districts Sports Officers and Administrators (BPS-17) and found them correct except at the following columns:-

S.#	Column No.	Present entry	To be replaced by (attach copy if any)	Remarks
1	1	18	9	

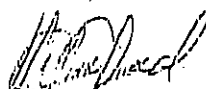
The following discrepancies are also brought into the notice:-

1. The subject tentative seniority list was issued on 1-5-2020 for the year 2020 and I objected to it dated 22-06-2020 (Annexure -A).
2. In the light of the Sports Department Notification No. SO(Sports)1-41/2020/2913-16 dated 10-9-2021, the Directorate General of Sports issued the said seniority list vide letter No.17/Seniority list/2021 dated 15-9-2021 (Annexure-B) and I again objected to it dated 28-9-2021 (Annexure - C).
3. Now the subject seniority list has been issued for the third time vide No. 17/Seniority list/2021/5051-54 dated 16/8/2022. My objections are still same as already raised two times previously mentioned at serial Nos. 1 & 2 above.
4. In the first seniority list the name of Miss Nazin Zaki was not included as she do not belong to cadre but her name has been included in the seniority list issued second time on 15/9/2021 which is not understood. Her name may therefore be removed from the seniority list.

Dear Sir,

My objections are same on the subject current tentative seniority list as already objected on the first and second tentative seniority list as explain above.

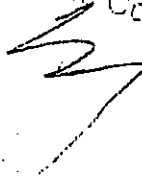
It is therefore requested that my objections may kindly be accepted being valid and justified on the basis of facts.

  
(Shakil Ahrinad)

Assistant Director (BPS-17)

Dated:- 29-08-2022

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Sports are essential for the development of a happy, healthy & vigorous society

**DIRECTORATE GENERAL OF SPORTS  
KHYBER PAKHTUNKHWA**  
PESHAWAR SPORTS COMPLEX, PESHAWAR CANIT.  
Ph: # 9212767, Fax # 9212766

Dated Peshawar, the 27<sup>th</sup> January, 2023

CERTIFICATE

Received on  
5/3/23

It is further certified that the final seniority list of ADs, DSDs & Administrators (BPS-17) stood on 18-01-2023 is circulated, not subjudice in any Court of Law and not disputed.

*[Signature]*  
DIRECTOR GENERAL

DIRECTOR GENERAL  
Sports, Khyber Pakhtunkhwa  
Peshawar

*[Handwritten notes]*  
R.A.S.

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*[Signature]*

**STRUCTURE LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA**

Approved On: 18-01-2023.

1. Total Sanctioned Posts: 46 Posts i.e. 07 posts of Assistant Directors, 28 Posts of District Sports Officers & 11 posts of Administrators.  
 2. Total Posts: 46 Posts

**BASIC PAY SCALE: 17**

S.#	Name of Officer with academic Qualifications	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment with date	Remarks
				Date	BPS	Method of recruitment / appointment		
1)	Mr. Sikandar Shah, (Regional Sports Officer (a.c.b), M.Sc	25-04-1963 Kohat	04-06-1991	20-05-2014	17	By promotion	RSO (a.c.b) 20-05-2014	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis. His seniority has been fixed w.e.f. 20-05-2014 in light of the judgments of PHC.
2)	Mr. Muhammad Jamshid, (District Sports Officer), M.Sc.	05-05-1978 D.I.Khan	01-01-2005	20-05-2014	17	By promotion	DSO 20-05-2014	The seniority has been fixed w.e.f. 20-05-2014 in light of the judgments of PHC.
3)	Mr. Muhammad Suleman, (District Sports Officer), M.Sc.	01-04-1971 Dir Lower	06-06-1990	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
4)	Mr. Anwar Kamal, (District Sports Officer), B.A	27-03-1975 D.I.Khan	29-09-2005	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
5)	Mr. Amir Zahid Shah, (District Sports Officer), M.Sc.	05-09-1967 Bannu	29-06-1992	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
6)	Mr. Zakir Ullah, (District Sports Officer), M.A/ M.Sc.	22-04-1977 Peshawar	29-09-2005	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
7)	Mr. Razi Ullah Khan, (District Sports Officer), M.A/ M.Sc.	01-10-1979 Tank	02-09-2002	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
8)	Muhammad Ismail Khan, (District Sports Officer), M.A/ M.Sc.	02-06-1977 Bannu	19-06-2005	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
9)	Mr. Tariq Muhammad, (District Sports Officer), M.A/ M.Sc.	22-10-1972 Swabi	26-06-1997	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
10)	Mr. Asad Khan, (District Sports Officer), M.A	20-05-1968 Mardan	20-03-2006	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
11)	Mr. Ahmad Zaman, (District Sports Officer), M.Sc.	30-04-1980 Haripur	17-06-2009	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
12)	Mr. Munir Abbas, (District Sports Officer), MBA	12-3-1984 Hangu	09-08-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	On Deputation to Tourism & Culture Authority

(Contd..P/2)

DSO  
 District Sports Officer  
 R.N. 5  
 R.N. 6  
 R.N. 7  
 R.N. 8  
 R.N. 4  
 (G)

District Sports Officer  
 15-05-17  
 P. 10/17

S.#	Name of Officer with academic Qualifications	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment/ promotion to the present posts			Present appointment with date	Remarks
				Date	BPS	Method of recruitment / appointment		
13)	Mr. Kashif Farhan, (District Sports Officer), M.Phil	13-04-1984 Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	Working against the post of RSO Swat in OPS
14)	Mr. Hazrat Ullah, (District Sports Officer), PhD	01-01-1984 Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Hangu
15)	Mrs. Gul Rukh Gullam, (District Sports Officer), M.Sc	01-06-1991 Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Peshawar
16)	Mr. Amjad Iqbal, Assistant Director, Provincial HQ, MSc Botany (Gold Medalist)	19-6-1967 Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Assistant Director (Accounts)
17)	Mr. Shakel Ahmad, Assistant Director, Provincial HQ, M.A	04-1-1971 Buner	18-1-2008	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Assistant Director (Operation)
18)	Mr. Hamid Ali, Assistant Director, Provincial HQ, BIT (Hons.)	16-06-1985 Charsadda	14-07-2008	04-01-2022	17	By promotion	Assistant Director 04-01-2022	Assistant Director (H.Q)

The seniority of officers mentioned at S.No.1 to 11 has been fixed w.e.f. 20-05-2014 in light of the judgment of Peshawar High Court (Annex-I) and creation of supernumerary posts without back benefits by the Finance Department (Annex-II).

\*\*\*\*\*

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*M*

Approved

R.No. 1  
R.No. 11  
R.No. 12

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*Approved*

*Approved*

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G

20/3/23 17/5/23

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بخدمت جناب سیکرٹری سپورٹس گورنمنٹ آف خیبر پختونخوا پشاور

عنوان:- اعتراض برائے سنیاری لسٹ اسسٹنٹ ڈائریکٹر ڈسٹرکٹ سپورٹس آفیسر، ایڈمنسٹریٹو سروس 18/01/2023

جناب عالی:-

گزارش ہے کہ ڈائریکٹوریٹ جنرل آف سپورٹس خیبر پختونخوا میں اسسٹنٹ ڈائریکٹر ڈسٹرکٹ سپورٹس آفیسر، ایڈمنسٹریٹو سنیاری لسٹ 18/01/2023 کو ایڈو ہوا ہے جو کہ پہلے بھی رد نہ ہوا تھا جس پر ہم نے اعتراض کیا تھا، لیکن ابھی تک اس کا کوئی جواب نہیں آیا۔

جناب عالی:-

اب سنیاری لسٹ کو 18/01/2023 کو ایڈو ہوا ہے جس پر ہمارا اعتراض ہے اور اس پر سب سے بڑا اعتراض یہ ہے کہ اس کو چیک سے ایڈو کیا ہے اور ہم کو بے خبر رکھا گیا ہے لیکن ہمیں سنیاری لسٹ کی اپنی ٹی ہے۔

1- اعتراض اس پر وہی ہے جو پہلے تھا لیکن اس میں ایک اضافہ کر دیا ہے کہ اس کو چیک سے ایڈو ہوا ہے اور ہمارے معزز ساتھی نے اس پر پروموشن کیلئے کام بھی شروع کیا ہے۔ جناب والا اللہ تعالیٰ نے ایسا کوئی - پیدا نہیں کیا ہے جس کا عمل نہ ہو۔ سو ذرہ سنیاری لسٹ کے بارے میں، میں مندرجہ ذیل تجاویز پیش کرتا ہوں۔

1- اس سنیاری لسٹ میں اسے - ہسٹ ہمارا کوئی اعتراض نہیں ہے کہ اگر ممکن ہو تو ان کا کس PSB کو بغیر کسی شک و شبہ ارسال کر سکتے ہیں۔

2- جن DSOs کی انگریزیشن ہوئی ہے وہ ابھی تک 16 گریڈ میں ہے اور 17 کے مراعات لے رہے ہیں ان کی DPC کیا جائے۔

3- اگر پیر 2 تجویز قابل عمل نہیں ہے تو سنیاری کو الگ الگ کریں۔ DSO کو RSO اور AD کو DD تک سنیاری دی جائے۔ اور admin کیلئے chief admin کا پوسٹ کریٹ کیا جائے جس طرح گوجر کی سنیاری میں ہوا ہے۔

4- اگر پیر 3 کی تجویز قابل عمل نہیں ہے تو پھر فیصد کے لحاظ سے سنیاری دی جائے 70 فیصد DSO، 20 فیصد ADS اور 10 فیصد admin

جناب والا مندرجہ بالا تجاویز صرف اور صرف 8 سے لیکر 17 تک کے آفیسر کیلئے ہے اسے لیکر 7 تک اس تجاویز میں شامل نہیں ہیں اسکو جس طرح چاہیں پروموشن دیا جائے۔

العارض

کلیل احمد

اسسٹنٹ ڈائریکٹر ڈائریکٹوریٹ جنرل آف سپورٹس، خیبر پختونخوا

DD (AFC)

کاپی برائے اطلاع یابی

1- ڈائریکٹر جنرل سپورٹس خیبر پختونخوا

2- سیکرٹری اسسٹنٹ گورنمنٹ آف خیبر پختونخوا پشاور اس درخواست کے ساتھ کی مذکورہ سنیاری لسٹ متعلقہ سے لہذا اس کو اپنا قابل نہ کرے۔

اسسٹنٹ ڈائریکٹر ڈائریکٹوریٹ جنرل آف سپورٹس، خیبر پختونخوا  
کلیل احمد  
17/3/23

AD/HS

AD/HO

AD/HS

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TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA (AS STOOD ON 15-09-2021)

S#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 <sup>st</sup> Entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
1)	Mst. Nazia Zaki	M.A.	05-06-1986	Kurram	09-09-2013	09-09-2013	17	Regularization	Assistant Director	Appointed in the erstwhile FATA Sports Directorate
2)	Mr. Sikandar Shah (Regional Sports Officer (a.c.b))	M.Sc.	25-04-1963	Kohat	04-06-1991	24-04-2019	18 (a.c.b)	By promotion	RSQ (a.c.b)	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis.
3)	Muhammad Jamshid (District Sports Officer)	M.Sc.	05-05-1976	D.I.Khan	01-01-2005	20-12-2017	17	By promotion	DSO	Working as RSO Peshawar in OPS
4)	Muhammad Suleman (District Sports Officer)	M.Sc.	01-04-1971	Dir	06-06-1990	20-12-2017	17	By promotion	DSO	DSO Buner
5)	Mr. Ammar Kamal (District Sports Officer)	B.A.	27-03-1975	D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO	Working as RSO Bannu in OPS
6)	Mr. Amir Zahid Shah (District Sports Officer)	M.Sc.	05-09-1967	Bannu	29-06-1992	20-12-2017	17	By promotion	DSO	DSO Karak
7)	Mr. Zakir Ullah (District Sports Officer)	M.A/M.Sc.	22-04-1977	Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO	Working against the post of Assistant Director
8)	Mr. Razi Ullah Khan (District Sports Officer)	M.Sc.	01-10-1979	Tank	02-09-2002	20-12-2017	17	By promotion	DSO	Working as RSO DIKhan in OPS
9)	Muhammad Ismail Khan (District Sports Officer)	M.Sc.	02-06-1977	Bannu	19-06-2005	08-03-2018	17	By Upgradation	DSO	DSO Laki Marwal
10)	Mr. Tariq Muhammad (District Sports Officer)	M.Sc.	22-10-1972	Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO	DSO Swabi
11)	Mr. Asad Khan (District Sports Officer)	M.A.	20-05-1968	Mardan	20-03-2006	05-01-2018	17	By Upgradation	DSO	Working against the post of Assistant Director
12)	Mr. Ahmad Zaman (District Sports Officer)	M.Sc.	30-04-1980	Haripur	17-06-2009	06-03-2018	17	By Upgradation	DSO	DSO Manshura
13)	Mr. Munir Abbas (District Sports Officer)	MBA	12-3-1984	Bangou	09-05-2006	06-03-2018	17	By Upgradation	DSO	On Deputation to Tourism & Culture Authority

Bannu with Circle Bannu

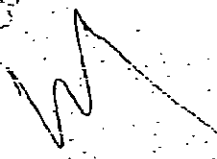
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S#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 <sup>st</sup> Entry into Govt. Service	Regular appointment/promotion to the present posts			Present appointment	Remarks
						Date	DPS	Method of recruitment / appointment		
14)	Kashif Farhan (District Sports Officer)	M.Phil	13-04-1984	Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Swat
15)	Hazrat Ullah (District Sports Officer)	MS	01-01-1984	Karal	31-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Hangr
16)	Gul Rubb Gulfar (District Sports Officer)	M.Sc	01-06-1991	Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO	DSO Haripur
17)	Azmad Iqbal, Assistant Director, Provincial HQ	MSc Botany (Gold Medalist)	19-6-1967	Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director	Assistant Director (Acad.)
18)	Shakeel Ahmad, Assistant Director, Provincial HQ	MA	04-1-1971	Bunir	18-1-2008	28-05-2019	17	By Promotion	Assistant Director	Assistant Director

20/5/20

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*Sports are essential for the development of a happy, healthy & vigorous society*

## DIRECTORATE GENERAL OF SPORTS

KHYBER PAKHTUNKHWA  
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.  
Ph: # 9212767 Fax # 9212766

No. 17/Seniority List/2022

Dated 17-04-2023

To,

The Secretary to Govt of Khyber Pakhtunkhwa,  
Sports and Youth Affairs Department, Peshawar.

Subject: APPEAL FOR ISSUANCE OF FINAL SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA.

Kindly refer to your letter No. SO(Sports)1-41/Seniority list/2023/3840-43, dated 6<sup>th</sup> April 2023 on the subject noted above and to submit the requisite replies to the observations raised by the Establishment Department: -

- i. Copy of Directorate General of Sports letter No. 17/Seniority List/2021/5051-54, dated 16-08-2022, whereby the tentative seniority list was circulated is attached as Annex-A.
- ii. The appeal of Mst Nazia Zaki, Assistant Director, Directorate of Sports merged areas is against the procedure and not considerable because she was required to submit the same through the Administrative Department. As regards the exclusion of her name from the tentative seniority list, a committee was constituted by the Sports Department vide Notification dated 21-12-2018 (Annex-B) for the settlement of issues arising out of the merger of the Directorate of Sports merged areas. A meeting of the committee was held on 02-11-2022. It was explained that the Directorate of Sports of the erstwhile FATA was initially a subsidiary office of the erstwhile FATA Education Department Khyber Pakhtunkhwa. Some employees were appointed under the Federal Government scheme FATA Sports Projects on contract basis from the year 2007 to 2010. Later on, the Finance Division Government of Pakistan through the Education Department created various categories of posts for the establishment of the Directorate of Sports erstwhile FATA. The employees of Directorate of Sports merged areas submitted appeal for absorption / adjustment in Sports Department Khyber Pakhtunkhwa against regular post. The case was referred to the Establishment Department for advice. The Establishment Department Khyber Pakhtunkhwa clarified vide letter No. SOR-1(ES&AD)4-1/2018 dated 09-09-2020 (Annex-C) that the issue regarding absorption and subsequent determination of seniority of employees of erstwhile FATA Sports Directorate comes in the ambit of surplus pool policy 2001. It is added that Finance Department created posts for the Directorate of Sports merged areas and allowed budget under a separate DDO code delegated under the post of Director Sports merged areas for 10 years. Moreover, the merger of erstwhile FATA is meant for the integration of the area while not that of the services of the government servants in any capacity of their services.

(Contd...P/2)

No policy guidelines have been issued by the Provincial Government so far in this regard. Hence the absorption of the employees of erstwhile FATA in the Directorate General of Sports Khyber Pakhtunkhwa will create agonies for the employees of the Directorate of Sports and will lead to litigation. Minutes of the meeting of the committee are at Annex-D. A detailed report was submitted to the Administrative Department vide letter dated 13-12-2022 Annex-E. Subsequently, the issue was discussed in a formal meeting held in the office of Additional Secretary Sports in which it was agreed to exclude the name of Mst Nazia Zaki, Assistant Director Directorate of Sports merged areas from the tentative seniority list based on facts mentioned in the minutes of the meeting of the committee as well as in the letter of Directorate of Sports as referred to above (Annex-D and E).

iii. Copy of the judgment dated 22-03-2018 passed by the august Peshawar High Court at Annex-F. In pursuance of the said judgment, Finance Department created supernumerary posts vide letter dated 13-09-2022 Annex-G. As regards, the rejection of observations raised by Mr. Amjad Iqbal and Mr. Shakeel Ahmad, it is pointed out that the officers at S.No. 08 to 15 of the tentative seniority list had taken the charge of the upgraded posts (that is DSO BS-17) on 08-03-2018, while Mr. Amjad Iqbal and Mr. Shakeel Ahmad were promoted to the equivalent posts of AD BS-17 on 28-05-2019, hence it is equivalent to charge the established right of seniority of Senior Officers. Therefore, the objection/observation raised by the above Officers was declared baseless in the meeting held in the office of the Additional Secretary Sports Department taking based on facts/records.

The said tentative list was circulated so many times and after considering objections, the same has now reached finality.

Copy of previous seniority list attached at Annex-II.

vi. Attested copies of the relevant pages of the budget books showing the details of sanctioned strength at Provincial, Regional & District offices are attached in Annex-I.

vii. The exact detail of sanction posts is available at Annex-II ibid.

Encl: As above.

  
DIRECTOR GENERAL



Sports are essential for the development of a happy, healthy & vigorous society.

**DIRECTORATE GENERAL SPORTS KHYBER**

**PAKHTUNKHWA**

PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.

Ph: # 9212767, Fax # 9212766

Dated Peshawar, the 16<sup>th</sup> August, 2022.


1. All Assistant Directors o/o DG Sports Khyber Pakhtunkhwa.
2. Assistant Director o/o Director Sports (Merged Areas).
3. All District Sports Officers in Khyber Pakhtunkhwa.
4. All Administrators o/o DG Sports / RSO's Khyber Pakhtunkhwa.

**TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA FOR THE YEAR 2022.**

Kindly refer to the subject noted above and to forward herewith a copy of tentative seniority list of Assistant Directors, District Sports Officers and Administrator in (BPS-17) of the Directorate General of Sports, Khyber Pakhtunkhwa alongwith the certificate proforma for perusal and intimation of objection / observations (if any). The tentative seniority list is issued in pursuance of Establishment Department Letter No. SOR-1(E&AD)4-1/2018 dated 27.04.2022.

Incorrect entry in service particulars or objection / observations on the list may be furnished on the enclosed proforma supported by attested photocopies of relevant documents within 15 days positively, otherwise, it will be presumed that entries made in the list are correct.

cl: As above.

  
DIRECTOR GENERAL

forwarded for information to the: -

1. The Section Officer (Sports), Sports & Youth Affairs Department w.r.t his Letter No. SO(Sports) 1-41/seniority list/2022/3107-10 dated 22.07.2022.
2. Director Sports (Merged Areas), Peshawar.

  
DIRECTOR GENERAL

16/8/22

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GOVERNMENT OF KHYBER PAKHTUNKHWA,  
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS & YOUTH  
AFFAIRS DEPARTMENT.

No. SO(sports) 2-75 (Misc) 2018  
Dated Peshawar, the 21<sup>st</sup> December, 2018.

12453-61

**NOTIFICATION**

No. SO(sports) 2-75 (Misc) 2018:- The Competent Authority has been pleased to constitute a Merger Committee for the settlement of issues arising out of the merger of the Directorate of Sports Merged Areas with the Sports Department, Khyber Pakhtunkhwa vide Establishment Department Notification No. SO(E-I)/E&AD/9-126/2018 dated 15-11-2018, with the following composition:-

- |  |           |
|--|-----------|
| 1. Director General Sports, Khyber Pakhtunkhwa.                    | In- Chair |
| 2. Deputy Secretary (Admn), Sports Department, KP.                 | Member    |
| 3. Chief Planning Officer, Sports Department, KP.                  | Member    |
| 4. Director Sports Merged Areas                                    | Member    |
| 5. Director concerned (Archaeology / Youth Affairs / Culture, KP). | Member    |

**TORs of the Committee:-**

- To see the status of ongoing and new schemes of the Directorate of Sports merged areas;
- Seniority issue of the officers /officials of the Directorate of merged areas as a result of merger with the Directorate General Sports, Khyber Pakhtunkhwa;
- Issues related to SNE and regularization of project / regular employees of the Directorate of Sports merged areas;
- All other issues arising out of the merger of the Directorate of Sports merged areas with the Directorate General Sports, Khyber Pakhtunkhwa;
- Preparation of report and making recommendation.

Secretary to Government of Khyber Pakhtunkhwa  
Sports, Tourism, Archaeology, Museums &  
Youth Affairs Department

Endst: No. SO(sports) 2-75 (Misc) 2018      Dated Peshawar, the 21<sup>st</sup> Dec, 2018.

**Copy to the:-**

- All the members of the committee.
- PS to Senior Minister for Sports and Youth Affairs, Khyber Pakhtunkhwa.
- PS to Secretary Establishment Department, Khyber Pakhtunkhwa.
- PS to Secretary Sports & Youth Affairs Department, Khyber Pakhtunkhwa.
- PS to Secretary Administration, Merged Areas Secretariat, Wursak Road, Peshawar.

MAMA  
(SAJJIDAWAZI)

Ok  
12/20 21/1/19

Dir (SP)

1-19-2018 (H.O)



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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT & ADMN: DEPARTMENT  
(Regulation Wing)

NO. SOR-1 (E&AD) 4-1/2018  
Dated Peshawar the 9<sup>th</sup> September, 2020

SECRETARY  
ESTABLISHMENT & ADMN. DEPARTMENT  
PESHAWAR  
6239  
10-09-20

To, The Secretary to Govt. of Khyber Pakhtunkhwa,  
Sports, Culture, Tourism, Archaeology, Museum & Youth Affairs Department

Subject: - APPEAL FOR ABSORPTION/ADJUSTMENT OF REGULAR EMPLOYEES OF ERSTWHILE FATA SPORTS DIRECTORATE INTO SPORTS DEPARTMENT KHYBER PAKHTUNKHWA, AGAINST REGULAR POSITIONS

Dear Sir,

20137

I am directed to refer to your letter NO. SO (Sports)2-75 (Merged Areas) 2019/8916-19 dated 29.07.2020 on the captioned subject and to state that Establishment Department examine all the service matter cases in light of Khyber Pakhtunkhwa Civil Servant Act, 1973, Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and Policy Instructions issued thereunder. Since the issue in hand pertains to the absorption and subsequent determination of seniority of employees of ex-FATA Directorate of Sports which comes under the ambit of Surplus Pool Policy-2001. Therefore, the serial replies to the questions raised by the Administrative Department are as under:-

- i. Para-4 of the Surplus Pool Policy 2001 stipulates that "Consequent upon the abolition of a post in a particular cadre of a department, the junior most employees in that cadre would be declared as surplus. Such posts should be abolished in the respective departments and created in the surplus pool for the purpose of drawal of pay and allowances and also for consideration for subsequent adjustment". Furthermore, para-5 (ii) of the Policy ibid provides that "no opt for readjustment/absorption against a future vacancy of his status/BPS which may not necessarily be in his original Cadre/Department". Establishment Department is of the view to follow the same guidelines/principle of the Surplus Pool Policy 2001 in the instant case in its true spirit.
- ii. Para-6 (b) of the Surplus Pool Policy-2001, stipulates that "In case, however, he is adjusted in his respective cadre but in a Department other than his parent Department, he shall be placed at the bottom of seniority list of that cadre". Para-6 (c) of Policy ibid further stipulates that "in case of his adjustment against a post in a corresponding basic pay scale with different designation/nomenclature of the post, either in his Parent Department or in any other department, he will be placed at the bottom of seniority list". The provision of the Policy referred to above are very much clear, the Department is required to follow the same in letter & spirit.
- iii. Para-5 (c) of the Surplus Pool Policy-2001 says that "adjustment shall be made on vacant post pertaining to initial recruitment quota". The said provision being self-explanatory needs to be followed by the Sports Department in its true spirit.

S-11  
9-2020

Dated	10-09-2020
C.P.O	
DS-III	
DS-IV	
JOINT	
JOSSYA	
HY & CUL	

Yours faithfully,  
  
(ABDUL AHAD)  
SECTION OFFICER, (R-1)  
Phone # 9210860.

16/09/20

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MINUTES OF THE MEETING TO DISCUSS VARIOUS ASPECTS REGARDING  
THE ABSORPTION / ADJUSTMENT OF EMPLOYEES OF ERSTWHILE FATA  
SPORTS DIRECTORATE INTO THE DIRECTORATE GENERAL OF SPORTS  
HELD ON 11<sup>th</sup> NOVEMBER 2022 AT 10.00 A.M. UNDER THE CHAIRMANSHIP OF  
DIRECTOR GENERAL, SPORTS IN HIS OFFICE.

A meeting was held on 2<sup>nd</sup> November 2022 at 10.00 A.M. under the Chairmanship of Director General, Sports Khyber Pakhtunkhwa in his office to discuss various aspects regarding the absorption/adjustment and seniority of the employees of erstwhile FATA Sports Directorate into the Directorate General of Sports Khyber Pakhtunkhwa. A list of the participants is attached.

The Chair opened the discussions and welcomed the participants. The Deputy Director (A&E) informed that some employees of the Sports Directorate of the erstwhile FATA submitted an appeal for absorption/adjustment into Sports Department against regular positions. The Sports Department referred the case to the Establishment Department of Khyber Pakhtunkhwa for advice. The Establishment Department Khyber Pakhtunkhwa clarified vide letter No. SOR-I(E&AD)4-1/2018, dated 09-09-2020 (copy at Annex-I) that the issue regarding absorption and subsequent determination of seniority of employees of erstwhile-FATA Sports Directorate comes in the ambit of Surplus Pool Policy 2001. The relevant Paras of the said surplus pool policy have been revealed in annex-A ibid. The Sports Department again referred the case to the Establishment Department for advice. The Establishment Department Khyber Pakhtunkhwa advised vide letter No. SOR-I(E&AD)4-1/2018, dated 06-04-2021 (copy at Annex-II) to examine and dispose-off the case on own level in light of rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. After detailed discussions, the following was agreed: -

1. It is pertinent to mention that the Directorate of Sports of the erstwhile FATA was initially a subsidiary office of the erstwhile FATA Education Department Khyber Pakhtunkhwa. The applicants and some others employees were appointed under the Federal Govt scheme FATA Sports Projects on a contract basis from the year 2007 till 2010. Later on, the Finance Division Govt of Pakistan through the Education Department created various categories of posts for the establishment of the Directorate of Sports erstwhile FATA.
2. In wake of the merger of the erstwhile FATA with Khyber Pakhtunkhwa in light of the 25th amendment in the constitution of the Islamic Republic of Pakistan 1973, the Government of Khyber Pakhtunkhwa Establishment Department vide Notification dated 15-11-2018 in the aftermath of the merger of FATA with

(Contd....P/2)

Khyber Pakhtunkhwa, the Directorate of Sports working under the FATA Secretariat shall henceforth report to their respective Administrative Secretary i.e. Secretary Sports Department. In light of the said Notification, the Sports Department vide order dated 21-12-2018 has instructed that the Directorate of Sports Merged Areas shall route all official business through Director General Sports to the Administrative Department.

3. Moreover, the Finance Department created posts for the Directorate of Sports merged areas and allocated budget under a separate DDO code delegated under the post of Director Sports merged Areas for 10 years.
4. Moreover, the merger of erstwhile FATA is meant for the integration of the area while not that of the services of the government servants working in any capacity of their services.
5. No policy guidelines have been issued by the Provincial Govt so far in this regard. Hence the absorption of the employees of erstwhile FATA in the Directorate General of Sports Khyber Pakhtunkhwa will create agonies for the employees of the Directorate of Sports and will lead to litigation.
6. The applicants were directed to produce precedents if any in this regard.

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*Sports are essential for the development of a happy, healthy & vigorous society*



**DIRECTORATE GENERAL OF SPORTS**

**KHYBER PAKHTUNKHWA**

PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.

Ph: # 9212767, Fax # 9212766

No.3A/Merged Areas/DGs/2019/2375-78 Dated Peshawar, the 13<sup>th</sup> December, 2022.

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Sports and Youth Affairs Department.

Subject: - MEETING OF MERGER COMMITTEE FOR THE SETTLEMENT OF ISSUES ARISING OUT OF THE MERGER OF DIRECTORATE OF SPORTS MERGED AREAS WITH SPORTS DEPARTMENT.

Dear Sir,

I am directed to refer to your office letter No. SO (Sports), 2-75/Merged Areas/2022/8562-66 dated 30-08-2022 on the subject noted above and to say that meeting of the merger committee was held on 02-11-2022 under the chairmanship of Director General Sports Khyber Pakhtunkhwa and the appeal of some of the employees of the Sports Directorate of the Erstwhile FATA for absorption / adjustment into Sports Directorate were discussed in detail. The Sports Department referred the case to the Establishment Department Khyber Pakhtunkhwa for advice.

It is pertinent to mention that the Directorate of Erstwhile FATA initially a subsidiary office of the Erstwhile FATA Education Department Khyber Pakhtunkhwa. The applicants and some others employees were appointed under the Federal Govt scheme FATA sports projects on contract basis from the year 2007 till 2010. Later-on, the Finance Division Govt of Pakistan through Education Department created various categories of posts for the establishment of Directorates of Sports Erstwhile FATA. In wake of the merger of the Erstwhile FATA with Khyber Pakhtunkhwa in light of the 25<sup>th</sup> amendment in the constitution of Islamic Republic of Pakistan 1973, the Government of Khyber Pakhtunkhwa Establishment Department vide notification dated 15-11-2018 in the aftermath of the merger of FATA with Khyber Pakhtunkhwa, the Directorate of Sports working under the FATA Secretariat shall henceforth report to their respective Administrative Secretary i.e. Secretary Sports Department. In light of the said notification, the Sports Department vide order dated 21-12-2018 has instructed that the Directorate of Sports Merged Areas shall route all official business through Director General Sports to the Administrative Department.



**TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA AS STOOD ON 18.08.2023**

S.No.	Cadre	No. of Posts.
1	Assistant Directors (BPS-17)	11
2.	District Sports Officers (BPS-17)	35
3	Administrator (BPS-17)	12
	<b>Total sanction posts</b>	<b>58</b>

S.#	Name of Officer with academic Qualifications	Designation	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment with date	Remarks
					Date	BPS	Method of recruitment / appointment		
1	2	3	4	5	6	7	8	9	10
1.	Mst. Nazia Zaki, M.PED/ MBA	Assistant Director	05-06-1986 Kuram	09-09-2013	09-09-2013	17	By initial recruitment	Assistant Director 09-09-2013	Dy: Director (Estab:) o/o DG Sports
2.	Mr. Muhammad Jamshid, M.Sc.	District Sports Officer	05-05-1978 D.I.Khan	01-01-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Administrator o/o DSO Charsadda
3.	Mr. Muhammad Suleman, M.Sc.	District Sports Officer	01-04-1971 Dir Lower	06-06-1990	20-12-2017	17	By promotion	DSO 20-12-2017	RSO Mardan
4.	Mr. Anwar Kamal, B.A	District Sports Officer	27-03-1975 D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO 20-12-2017	RSO D.I.Khan
5.	Mr. Amir Zahid Shah, M.Sc.	District Sports Officer	05-09-1967 Bannu	29-06-1992	20-12-2017	17	By promotion	DSO 20-12-2017	DSO Karak
6.	Mr. Zakir Ullah, M.A/ M.Sc.	District Sports Officer	22-04-1977 Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO 20-12-2017	RSO Peshawar
7.	Mr. Razi-Ullah Khan, M.A/M.Sc.	District Sports Officer	01-10-1979 Tank	02-09-2002	20-12-2017	17	By promotion	<del>DSO</del> 20-12-2017	DSO Tank
8.	Mr. Muhammad Ismail Khan, M.A/ M.Sc.	District Sports Officer	02-06-1977 Bannu	19-06-2005	08.03.2018	17	By Upgradation	DSO 08-03-2018	DSO Lakki Marwat

*[Handwritten Signature]*

(Contd..P/2)

**TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OFSPORTS KHYBER PAKHTUNKHWA AS STOOD ON 18.08.2023**

S. #	Name of Officer with academic Qualifications	Designation	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment with date	Remarks
					Date	BPS	Method of recruitment / appointment		
1	2	3	4	5	6	7	8	9	10
9.	Mr. Tariq Muhammad, MA/MSc	District Sports Officer	22-10-1972 Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Swabi
10.	Mr. Asad Khan, M.A	District Sports Officer	20-05-1968 Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	Assistant Director o/o DG Sports Khyber Pakhtunkhwa
11.	Mr. Ahmad Zaman, M.Sc.	District Sports Officer	30-04-1980 Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO 08-03-2018	RSO Abbottabad
12.	Mr. Munir Abbas, MBA	District Sports Officer	12-3-1984 Hangu	09-08-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	D.D (Dev:) (BPS-18) o/o DG Sports Khyber Pakhtunkhwa
13.	Mr. Kashif Farhan, M.Phil	District Sports Officer	13-04-1984 Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	D.D (Dev:) o/o DG Sports Khyber Pakhtunkhwa
14.	Mr. Hazrat Ullah, PhD	District Sports Officer	01-01-1984 Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Hangu
15.	Mrs. Gul Rukh Gulfam, M.Sc	District Sports Office	01-06-1991 Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Peshawar
16.	Mr. Amjad Iqbal, MSc Botany (Gold Medalist)	Assistant Director,	19-6-1967 Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Assistant Director (Accounts) o/o DG Sports Khyber Pakhtunkhwa
17.	Mr. Shakil Ahmad, M.A	Assistant Director	04-1-1971 Buner	18-1-2008	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	RSO Swat
18.	Mr. Hamid Ali, BIT (Hons:)	Assistant Director	16-06-1985 Charsadda	14-07-2008	04-01-2022	17	By promotion	Assistant Director 04-01-2022	Assistant Director (H.Q) o/o DG Sports Khyber Pakhtunkhwa

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*[Signature]* (Contd..P/3)

**TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA AS STOOD ON 18.08.2023**

S.#	Name of Officer with academic Qualifications	Designation	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment/ promotion to the present posts			Present appointment with date	Remarks
					Date	BPS	Method of recruitment / appointment		
1	2	3	4	5	6	7	8	9	10
19.	Mr. Taj Muhammad, M.Sc (HPE)	District Sports Officer	07-07-1984 South Waziristan	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	DSO Bajaur with additional charge of DSO Mohmand
46/20.	Mr. Noor Ullah, M.Sc (HPE)	District Sports Officer	09-08-1984 Sub-Division Bannu	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	DSO South Waziristan
21.	Mr. Rahid Gul, M.Sc	District Sports Officer	24-08-1986 Khyber	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	AD (Training) o/o DG Sports Khyber Pakhtunkhwa
22.	Mr. Saeed Akhtar, M.Sc (HPE)	District Sports Officer	10-03-1975 Mohmand	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	DSO Khyber
23.	Mr. Amjad Hussain, M.Sc (Agriculture)	District Sports Officer	07-04-1977 Kuram	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	DSO Kuram

(Contd..P/4)

**TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA AS STOOD ON 18.08.2023**

S.#	Name of Officer with academic Qualifications	Designation	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment/ promotion to the present posts			Present appointment with date	Remarks
					Date	BPS	Method of recruitment / appointment		
1	2	3	4	5	6	7	8	9	10
24.	Mr. Sajid Khan, M.Sc (HPE)	District Sports Officer	15-01-1986 Sub-Division Kohat	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	DSO Kohat having additional charge of RSO Kohat
25.	Mr. Muhammad Hussain, BBA (Hon) & M.Sc (HPE)	District Sports Officer	04-04-1990 Orakzai	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	DSO Orakzai
26.	Mr. Sheraz Khan Wazir, MCS	District Sports Officer	15-03-1985 North Waziristan	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	Waiting for posting
27.	Mr. Irfan Ullah, M.Sc	District Sports Officer	10-09-1977 Sub-Division Tank	13-01-2022	13-01-2022	17	By initial recruitment via regularization Act-2021	DSO 13-01-2022	Waiting for posting

*[Handwritten Signature]*

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*Sports are essential for the development of a happy, healthy & vigorous society.*



**DIRECTORATE GENERAL OF SPORTS**

**KHYBER PAKHTUNKHWA**

PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.

Ph: # 9212767, Fax # 9212766

No. 17/Seniority/ 2022/652-55

Dated Peshawar, the 21<sup>st</sup> August, 2023

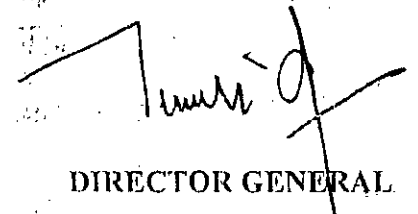
To

- i. All Assistant Directors & Administrators o/o DG Sports Khyber Pakhtunkhwa.
- ii. All District Sports Officer in Khyber Pakhtunkhwa
- iii. All Administrators o/o Regional Sports Officers in Khyber Pakhtunkhwa.

Subject: - **TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS IN BPS-17, DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA.**

Reference to the subject noted above and to enclose herewith a copy of tentative seniority list of Assistant Directors/ District Sports Officers and Administrators (BPS-17) of the Directorate General of Sports Khyber Pakhtunkhwa as stood on 18-08-2023 for your perusal and objection, if any with the directions that your objections (if any) must reach to this office within fifteen (15) days stipulated time on the enclosed format. The objection received after the expiry of said date will not be considered / entertained, and the tentative seniority list shall be treated as final.

Encl: As above.

  
DIRECTOR GENERAL

Copy forwarded for information to P.S to Secretary to Govt. of Khyber Pakhtunkhwa Sports & Youth Affairs Department.

  
DIRECTOR GENERAL

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D No - 196  
Dated - 01-09-2023

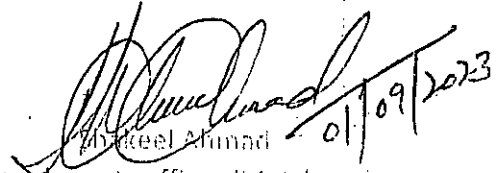
To,

The Director General  
Sports Khyber Pakhtunkhwa  
Peshawar,

Subject :- Objection On Tentative Seniority List Of Assistant Directors,  
Districts Sports Officers And Administrator (Bps-17), Directorate  
General Of Sports Khyber Pakhtunkhwa.

Dear Sir,

Kindly refer to your good office letter No. 17/ Seniority/2022/652-55 dated  
21-08-2023 on the subject noted above and to submit here with observation/  
objection officers at s. No. 1 and from S. No. 8 to 15 regarding my seniority  
position favorable action.

  
M. Azeel Ahmad 01/09/2023

Regional sports officer (Malakand)  
at Swat

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## CERTIFICATE

SUBJECT:- Objection On Tentative Seniority List Of Assistant Directors, Districts Sports Officers And Administrator (Bps-17), Directorate General Of Sports Khyber Pakhtunkhwa For The Year 2023.

Dear Sir,

It is certified that I have gone through my particulars mentioned at serial no.18 Of the tentative seniority list of Assistant Directors, Districts Sports Officers and Administrators (BPS-17) and found them correct except at the following columns:-

s.#	Column no.	Present entry	to be replaced by (attach copy if any)	Remarks
1	1	17	9	As per given reason/ justification

The following discrepancies are also brought into the notice:-

1. The subject tentative seniority list was issued on 1-5-2020 for the year 2020 and Objected to it dated 22-06-2020(annexure-A).
2. In the light of the sports department notification No. SO(sports)1-41/2020/2913-16 dated 10-9-2021, directorate GENERAL of sports of sports issued the said seniority list Vide letter no. 17/seniority list/2021 dated 15-9-2021(annexure-B) and I again objected to it dated 28-9-2021(annexure-C).
3. Now the subject seniority list has been issued for the third time vide No.17/seniority list /2021/5051-54 dated 16/08/2022. My objections are still same as already raised two time previously mentioned at serial Nos.1 & 2 above.
4. In the first seniority list the name of Miss Nazia zaki was not included as she do not belong to cadre but her name has been included in the seniority list issued second time on 15/9/2021 which is not understood. Her name therefore be removed from the seniority list.
5. For the 4<sup>th</sup> time the seniority list stood on 18-01-2023 issued without circulating among the officers and an undisputed certificate was issued and submitted for finalization to Secretary Sports on 27-01-2023(annexure-D).
6. I objected on 17-03-2023.(annexure-E)

And after all the above process I have not found any reply and then I knocked the door of the court and filed a Service appeal before the service Tribunal Peshawar on 17-06-2023, and 21-09-2023 date is fixed for hearing.(annexure-F)

Preliminary objections

1. Final or tentative seniority list must be approved by competent authority and issued under his signatures/ stamp. In our case it has not been done.
2. No O&M study has taken place for merger where some posts would be abolished, some rename some upgraded and recreated.
3. Officer at SL NO 1 has been shown recruited on initial appointment which is not true as initial recruitment in BPS-17 is only possible through Public Service Commission and in the instant case no such recommendation letter from Public Service Commission is available.

Details

It is added that the former FATA sports directorate a subordinate office of the former FATA education directorate has not been absorbed/merged in the DIRECTORATE GERNAL OF SPORTS Khyber PAKHTUNKHWA but in the new tentative seniority list, the name of Ms. Maria zaki and some other officers of the former FATA education directorate has been included which is against the rules.

It is further added that neither the DIRECTORATE GERNAL OF SPORTS restructured over the former SPORT DIRECTORATE, a subordinate office of the former FATA directorate, merged with the DIRECTORATE GERNAL OF SPORTS Khyber PAKHTUNKHWA. Actually, the staff of the former FATA Sport, were the employees engaged under a project of the former FATA education. So, it is humble requested that those officers may be adjusted in their parent department and exclude them form out seniority.

It is pertinent to mention that the Directorate of Sports Marge areas is still working independently/separately without any actual merger of services and budget in the Directorate General of Sports while the merger of erstwhile FATA is meant for the integration of the area while not that of the services of the government servants working in any capacity of the services, regular/ project / contract basis.

It is to further clarified that the post created for the posting the services of such employees (regular/contract /project) are created under the separate DDO code entrusted /delegated under the post of Director Sports Merged Areas, so there are not drawing their salaries from Director General Sports Khyber Pakhtunkhwa, which further delineate / illustrate that the erstwhile FATA sports Directorate is not yet merged in the Directorate General Of Sports Khyber Pakhtunkhwa, then no question of inter-se-seniority emerges at this time and is pre-mature while such matter are not yet decided by the Establishment Department Khyber Pakhtunkhwa. And the status of permanent absorption of services is not taken effect. It is further stated that those post of the erstwhile FATA directorate are not covered under existing service rules of the Directorate General Of Sports Khyber Pakhtunkhwa which seemingly creates an anomaly in itself in inter-se-seniority.

In this regard reference to the Establishment & Administration Department Khyber Pakhtunkhwa letter NO.sor-1(E&AD)-1-1-2018 dated 09-09-2020 addressed to secretary sports regarding the appeal or absorption/ adjustment of regular employee of erstwhile FATA sports

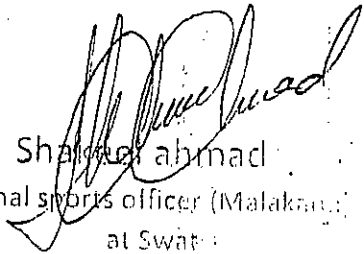


Directorate in the sports department Khyber PAKHTUNKHWA against regular position is invited where it is mentioned that the issue of absorption & subsequent determination of seniority of employee of EX-FATA Directorate of Sports come under the ambit of surplus pool policy 1991 and the establishment department further states that the sports department need to follow the same in the true spirit.

Similarly objection/ observation against the officers from S# 8 to 15 is also given below :-

- i. The post of deputy district sports officers BPS-16 have been up-graded to the posts of district sports officers BPS-17 without mentioning incumbents of the post for which DPC is necessary as per laid down procedure. these officers (district sports officers) only took charged and availed all benefits of BPS-17 illegally because after the up-gradation of the posts of the deputy districts sports officers BPS-16 to districts sports officers BPS-17 DPC was required but no DPC was held for the up graded post of deputy districts sports officers BPS-16 to district sports officers BPS-17

In view of the above submission, it is clear that the assistant director at S# 1 and others from merged tribal districts are not eligible to be represented in the seniority list while district sports officers from S# 8 to 15 of the seniority list are still in BPS-16 and availing all benefits of BPS -17 without any legal procedure and they are still junior to me and as it is requested that necessary correction in the seniority list may kindly be made my due right may be giving to me.

  
 Shafiq Ahmad  
 Regional sports officer (Malakand)  
 at Swat

EXTRAORDINARY

GOVERNMENT



REGISTERED NO. PIII

GAZETTE

Annex I

## KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10<sup>th</sup> OCTOBER, 2023.

### GOVERNMENT OF KHYBER PAKHTUNKHWA SPORTS & YOUTH AFFAIRS DEPARTMENT

#### NOTIFICATION

Peshawar Dated, the 10<sup>th</sup> October, 2023.

NO. SO (Sports)1-41/2023/1975-82: In pursuance of Section-8 (1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following final seniority list of Assistant Directors, District Sports Officers and Administrators (BS-17) of Directorate General of Sports, Khyber Pakhtunkhwa as it stood on 18-08-2023 is hereby notified.

#### FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA

Total sanctioned posts: 59 Eleven (11) Assistant Directors, Thirty-Five (35) District Sports Officer and Thirteen (13) Administrators (BPS-17)

i. Filled: 27

ii. Vacant: 32

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**FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA AS STOOD ON 18-08-2023**

S.#	Name of Officer with academic Qualifications	Date of birth and domicile	Date of 1 <sup>st</sup> entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment with date	Remarks
				Date	BPS	Method of recruitment / appointment		
1)	Mst. Nazia Zaki, M.PED/ MBA	05-06-1986 Kurrum	09-09-2013	09-09-2013	17	By regularization	Assistant Director 09-09-2013	Dy. Director (Estatr) o/o DG Sports
2)	Mr. Muhammad Jamshid, M.Sc.	05-05-1978 D.I.Khan	01-01-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Administrator o/o DSO Charsadda
3)	Mr. Muhammad Suleman, M.Sc.	01-04-1971 Dir Lower	06-06-1990	20-12-2017	17	By promotion	DSO 20-12-2017	District Sports Officer, Mohmand
4)	Mr. Anwar Kamal, B.A	27-03-1975 D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Regional Sports Officer, D.I. Khan
5)	Mr. Amir Zahid Shah, M.Sc.	05-09-1967 Bannu	29-06-1992	20-12-2017	17	By promotion	DSO 20-12-2017	Dy. Director (operation) O/o Director General Soprts
6)	Mr. Zakir Ullah, M.A/ M.Sc.	22-04-1977 Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Regional Sports Officer, Peshawar
7)	Mr. Razi Ullah Khan, M.A/ M.Sc.	01-10-1979 Tank	02-09-2002	20-12-2017	17	By promotion	DSO 20-12-2017	District Sports Officer, Tank
8)	Mr. Muhammad Ismail Khan, M.A/ M.Sc.	02-06-1977 Bannu	19-06-2005	08.03.2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Larki Marwat
9)	Mr. Tariq Muhammad, MA/MSc.	22-10-1972 Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Swabi
10)	Mr. Asad Khan, M.A	20-05-1968 Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	AD o/o DG Sports Khyber Pakhtunkhwa
11)	Mr. Ahmad Zaman, M.Sc.	30-04-1980 Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO 08-03-2018	Regional Sports Officer, Abbottabad

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FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA AS STOOD ON 18-08-2023

12)	Mr. Munir Abbas, MBA	12-03-1984 Hangu	09-08-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	D.D (Dev.) (BPS-18) (OPS) o/o DG Sports Pakhtunkhwa Khyber
13)	Mr. Kashif Farhan, M.Phil	13-04-1984 Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Khyber
14)	Mr. Hazrat Ullah, PhD	01-01-1984 Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Karak having additional charge.Hangu
15)	Mrs. Gul Rukh Gulfam, M.Sc	01-06-1991 Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Peshawar
16)	Mr. Amjad Iqbal, MSc Botany (Gold Medalist)	19-6-1967 Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	AD (Accounts) o/o DG Sports Khyber Pakhtunkhwa
17)	Mr. Shakil Ahmad, M.A	04-1-1971 Buner	18-1-2008	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Regional Sports Officer, Swat
18)	Mr. Hamid Ali, BIT (Hons.)	16-06-1985 Charsadda	14-07-2008	04-01-2022	17	By Promotion	Assistant Director 04-01-2022	Administrator, Mardan Sports Complex, Mardan
19)	Mr. Taj Muhammad, M.Sc (HPE)	07-07-1984 South Waziristan	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	Administrator, Swabi Sports Complex
20)	Mr. Noor Ullah, M.Sc (HPE)	09-08-1984 Sub- Division Bannu	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, South Waziristan
21)	Mr. Rahid Gul, M.Sc	24-08-1986 Khyber	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	AD (HQ) o/o DG Sports Khyber Pakhtunkhwa
22)	Mr. Saeed Akhtar, M.Sc (HPE)	10-03-1975 Mohmand	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, Mardan
23)	Mr. Amjad Hussain, MSc. (Agriculture)	07-04-1977 Kurram	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, Kurram
24)	Mr. Sajid Khan, M.Sc (HPE)	15-01-1986 Sub- Division Kohat	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	DSO Kohat having additional charge of RSO Kohat
25)	Mr. Muhammad Hussain, BBA (Hon) & MSc. (HPE)	04-04-1990 Orakzai	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, Orakzai

**FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA AS STOOD ON 18-08-2023**

26)	Mr. Sheraz Khan Wazir, MCS	15-03-1985- North Waziristan	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, North Waziristan
27)	Mr. Irfanullah, MSc.	10-09-1977 Sub-Division Tank	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	Administrator, D.I. Khan Sports Complex

**Note:** - The said seniority list is final, undisputed and not sub-judice in any court of law.

**Secretary to Government of Khyber Pakhtunkhwa  
Sports & Youth Affairs Department**

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خدمت جناب چیف سیکرٹری خیر پختونخواہ بمقام پشاور

عنوان:- حکمانہ ایپل برائے سیناری لیسٹ آسٹریلیا، ڈائریکٹر، اسپورٹس ایڈمنسٹریٹو کھیل خیر پختونخواہ

بتاریخ 18-08-2023 تاریخ (فریڈیک کیسٹرن) 10-10-2023

جناب عالی!

گزارش کی جاتی ہے کہ

- 1- سال 2020 میں پیلا سیناری لیسٹ مورچہ 01/05/2020 کو شائع ہوا جس پر میں نے مورچہ 22/06/2022 کو اپنا نام لکھا مگر جواب نداد۔ (کاپی لف ہے)
- 2- پھر کھیل کے ڈائریکشن نمبر 16-1-41/2020/2913-So(Sports) بتاریخ 10/09/2020 کے تحت نکلاست کھیل کے سیناری لیسٹ 17/Seniority List/2021 بتاریخ 15/09/2021 شائع ہوا جس پر میں بتاریخ 28/09/2021 جمع مگر پھر بھی جواب نداد۔ (کاپی لف ہے)
- 3- پھر تیسرے مرتبہ سیناری لیسٹ نمبر 17/Seniority List/2021/5051-54 مورچہ 16/08/2022 کو شائع ہوا جس میں نے تیسری مرتبہ مورچہ 29/08/2022 کو پھر اعتراض جمع کیا۔ (کاپی لف ہے)
- لیکن جناب سیناری لیسٹ میں نازیہ زکی نام کی میڈیم کا نام شامل کیا گیا جو کہ مورچہ 16 سے تعلق رکھتی تھی میں نے اس پر اعتراض جمع کیا۔ اس بارے میں کھیل کے ڈائریکٹر جنرل اسپورٹس کے سربراہی میں ایک کمیٹی قائم کیا جس نے رپورٹ کی نازیہ زکی کو سیناری لیسٹ سے خارج کرنے کی سفارش کی گئی۔ (کاپی لف ہے)
- 4- کمیٹی کے اس رپورٹ کے روشنی میں مورچہ 18/01/2023 کو چوتھی مرتبہ سیناری لیسٹ شائع ہوا اور مورچہ 21/01/2023 غیر شائع سرٹیفکیٹ دیا گیا۔ جناب والا اس پر بھی میں نے بتاریخ 17/03/2023 اعتراض جمع کیا لیکن پھر بھی جواب نداد۔ (کاپی لف ہے)
- مندرجہ بالا رپورٹ کی روشنی میں جب میری شنوائی نہ ہوئی تو پھر میں نے خیر پختونخواہ مورچہ ٹریڈنگ میں بتاریخ 17/06/2023 کو مورچہ ایپل فائل کیا جبکہ نکلاست کھیل کے دو تاریخوں میں جواب بھی داخل نہیں کیا۔ (کاپی لف ہے)

جناب والا!

اس دوران پانچویں مرتبہ سیناری لیسٹ مورچہ 21/08/2023 کو نازیہ زکی کا نام شامل کرتے ہوئے شائع کیا جس پر میں نے مورچہ 01/09/2023 کو پھر اعتراض جمع کیا۔ (کاپی لف ہے)

مورچہ ایپل کے باوجود کھیل کے فائل سیناری لیسٹ کو شائع کیا۔ (کاپی لف ہے)

جناب والا!

اس فائل سیناری لیسٹ پر میرا اس حکمانہ ایپل کو قبول کیا جائے اور فائل سیناری لیسٹ کو مورچہ ٹریڈنگ کے فائل

تک روکنے کی احکامات صادر فرمائیں تاکہ مجھے میرا حق مل جائے۔

المرقوم: 15/10/2023

کاپی برائے اظہار عیاشی

انکلیل احمد ریجنل اسپورٹس آفسر ملاکن سوات

1. سیکرٹری سپورٹس خیر پختونخواہ پشاور  
2. سیکرٹری انسٹیٹیوٹ خیر پختونخواہ پشاور  
3. ڈائریکٹر جنرل اسپورٹس خیر پختونخواہ پشاور

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Misc. A. No. /2024

IN

S. A. No. /2024

Shakel Ahmad

versus

Director General &amp; Others

**APPLICATION FOR DIRECTION TO  
RESPONDENTS TO NOT MAKE FURTHER  
PROMOTION:****Respectfully Sheweth,**

1. That applicant filed the subject appeal before this hon'ble Tribunal today.
2. That prima facie case exists, balance of convenience lies in favor of applicant and is hopeful of the success of the appeal.
3. That if juniors were promoted to the post of Deputy Director / Regional Sports Officers B-18 then the Service Appeal would become in-fructuous.
4. That facts and grounds of the appeal be treated as integral part of this application for grant of Interim Relief.

It is, therefore, most humbly requested that the official respondents be restrained from promoting R. No. 05 to 13 to the post of Deputy Director / Regional Sports Officers B-18 till the final decision of the case.

Applicant

Through



Saadullah Khan Marwat

Advocate

Date: 12-02-2024

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

Misc. A. No. /2024

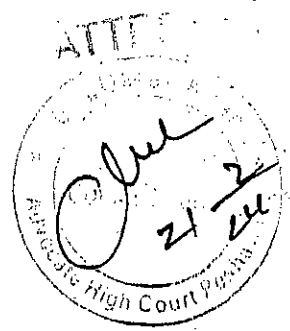
IN

S. A. No. /2024

Shakel Ahmad versus Director General & Others

**AFFIDAVIT**

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



*[Handwritten Signature]*  
DEPONENT



پشاور سروس ٹریڈ یونٹ صوبہ سرحد پشاور

SCANNED  
PKPST  
HAWAF

مخواب ایلٹ

شکل (م) نام  
محلہ (3) و م 0  
دعویٰ ایل

باسمہ تحریر یہ ایٹک

مقررہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و عمل کاروائی متعلقہ آن مقام پشاور کیلئے استعدائے اہل خانہ سے ایڈوکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی عمل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے دہنی نامہ و تقررات و فیصلہ مختلف دینے جواب دہی اور اقبال دعویٰ اور بھرتی و ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور رضی دعویٰ اور درخواست ہر قسم کی تعلیق از اس پر کھنڈ کرنے کا اختیار ہوگا نیز بھرتی عدم پیروی یا ڈگری کیسٹ فرم یا ایل کی برآمدگی اور تیسری نیز دائر کرنے اپیل ٹیکنالوجی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بھرتی ضرورت مقدمہ ہنگام کے عمل یا پیروی کاروائی کے واسطے اور وکیل یا مشاور قانونی کو اپنے ہمراہ یا اپنی بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مندرجہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منقار و قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہر جائزہ التوا مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و فرسبہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام روزہ پر ہو یا عدت سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ رکھ دیا کہ سند ہے۔

2024-02-17

القرب  
القرب

اریاب سیف اہمال  
ایڈوکیٹ

سید محمد خان فرست  
ایڈوکیٹ

محمد نواز  
ایڈوکیٹ