


FORM OF ORDER SHEET

Court of _____

Appeal No. 914/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/07/2024	<p>The appeal of Mr. Fazal Akbar presented today by Mr. Fazal Shah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 04.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No 914 /2024

Fazal Akbar.....Appellant

VERSUS

PPO & Others.....Respondents

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Dated:-25-06-2024

Appellant

Through



Fazal Shah Mohmand

Advocate,

Supreme Court of Pakistan

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301
8804841

Email:- fazalshahmohmand@gmail.com

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 914 /2024

Fazal Akbar, No P/297, Inspector, presently posted as Acting DSP, Risalpur, District, Nowshera.Appellant

VERSUS

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, Headquarters, Central Police Office, Peshawar.
3. Additional Inspector General of Police Investigation/Chairman Departmental Selection Committee, Peshawar.
4. Capital City Police Officer, Peshawar.

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR ANTE-DATION OF NOTIFICATION DATED 30-03-2023 AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN NOT RESPONDED SO FOR DESPITE THE LAPS OF STATUTORY PERIOD OF NINTY DAYS.

PRAYER:-

On acceptance of this appeal, the Notification dated 30-03-2023 may kindly be given effect from 19-10-2017 to the extent of the appellant thereby confirming the appellant as Inspector with further seniority/promotion with his colleagues with all back benefits.

Respectfully Submitted:

1. That the appellant was initially appointed as Assistant Sub Inspector in Shuhada son's Quota on 29-09-2007 and since appointment he performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That the appellant was then promoted to List "E" and also promoted as Officiating Sub Inspector and later on his promotion to List "E" and promotion to the rank of Officiating Sub Inspector was revised with effect from 27-09-2011 instead of 12-11-2013 vide Notification dated 22-02-2019 and subsequent to the Judgment of the honorable Peshawar High Court, Peshawar, the "E" List seniority of the appellant was revised w.e.f. 21-09-2007 instead of 27-09-2011 vide Notification dated 20-10-2020. **(Copy of Notification dated 22-02-2019 & Notification dated 20-10-2020 are enclosed as Annexure A & B).**
3. That the Seniority of the appellant as Sub Inspector was not revised for which the appellant requested respondents and which

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was recommended by the Deputy Commandant Elite Force vide Letter dated 11-01-2021, which was also recommended by the Departmental Selection Committee in its meeting held on 06-08-2021 and finally the Sub Inspector confirmation was revised w.e.f. 25-08-2014 instead of 29-09-2017 vide Notification dated 16-08-2021. **(Copy of Letter dated 11-01-2021, Minutes of DPC meeting dated 06-08-2021 & Notification dated 16-08-2021 are enclosed as Annexure C & D).**

4. That the colleagues rather juniors to the appellant were promoted as officiating inspectors on 19-10-2015 and subsequently were confirmed as inspectors on 29-09-2017 while the appellant was promoted as officiating inspector on 28-12-2020 for no fault and was confirmed as inspector vide Notification dated 30-03-2023 w.e.f from 20-12-2022. **(Copy of Notification dated 29-09-2017 & 30-03-2023 are enclosed as Annexure E & F).**
5. That the appellant is entitled to be confirmed as Inspector w.e.f from 19-10-2017, as he has been deprived for no fault from his due right and has been discriminated due to late confirmation the appellant was not promoted as DSP while junior to him were promoted as DSPs though the appellant had qualified the requisite training/course mandatory for promotion to the rank of DSP.
6. That the appellant filed departmental appeal on 15-03-2024 for ante-dation of Notification dated 30-03-2023 which was not responded so far despite the lapse of statutory period of ninety days. **(Copy of Departmental appeal is enclosed as Annexure G).**
7. That the impugned Notification dated 30-03-2023 is against the law, facts and principles of natural justice on the grounds inter alia as Follows.

GROUND:

- A. That the impugned Notification dated 30-03-2023, is illegal, unconstitutional, and unlawful, without lawful authority and of no legal effect, therefore need the interference of this honorable Tribunal.
- B. That the appellant is denied treatment in accordance with law and rules which being his fundamental right as per Article 4 and 25 of the Constitution and law of the land.

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- C. That the appellant perfectly fit, eligible, senior and coming up to the criteria, is entitled to be confirmed as Inspector with his colleagues.
- D. That in order to deprive the appellant of his due right of promotion and favor nears and dears, juniors to the appellant have been promoted, ignoring the appellant.
- E. That the seniority and confirmation in the rank of Sub Inspector of the appellant was revised and if his seniority in the rank of Inspector and List "F" is not revised, the same fault could not be attributed to the appellant.
- F. That the appellant is the senior, honest and dutiful officer with unblemished record but has not been confirmed as Inspector along with his colleagues. Though he is perfectly fit, eligible and coming up to the criteria as per law & rules.
- G. That the appellant seeks the permission of this honorable Tribunal for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant s may kindly be accepted, as prayed for.

Any other relief not specifically asked for and deemed appropriate in the circumstances of the case, may also be granted in favor of the appellant.

Dated:-25-06-2024


Appellant

Through


FAZAL SHAH MOHMAND

BASEER AHMED SHAH

&

IBAD UR REHMAN KHALIL

Advocates, Peshawar

CERTIFICATE:

Certified that as per instructions of my client, no Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.


ADVOCATE

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No _____/2024

Fazal Akbar.....Appellant

VERSUS

PPO & Others.....Respondents

A F F I D A V I T

I, Fazal Akbar, No P/297 Inspector, presently posted as Acting DSP, Risalpur, District, Nowshera, do hereby solemnly affirm and declare on oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

[Handwritten Signature]
DEPONENT





OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

A

Telephone No. 091-9210641 Fax No. 091-9212397

POLICE DEPTT:

CCP, PESHAWAR.

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

NOTIFICATION.

Dated 22/2/2019

No. 261 /EC-1, REVISED PROMOTION TO LIST "E" & PROMOTION TO THE RANK OF OFFG: SI:- As per recommendation of Departmental Promotion Committee meeting held on 12-02-2019 duly approved by competent authority, the name brought on promotion to list: "E" of ASI Fazal Akbar now SI No. P/297 is hereby revised w.e. from 27-09-2011 instead of 13-09-2012 and his promotion to the rank of offg: SI is also revised w.e. from 27-09-2011 instead of 12-11-2013.

However, he will not claim any financial back benefits.

No. 20-65 /EC-1,

[Signature]
FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.

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

1. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar, along with two spare copies for Publication, KPK, Gazette Notification Part-II.
2. The Addl: Inspector General of Police Elite Force KPK, Peshawar
3. EC-II & ASI CCP, Peshawar.



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9212592

POLICE DEPTT.

CCP, PESHAWAR.

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

NOTIFICATION.

Dated 20/10/2020.

No. 17576/EC-I, Revised "E" List seniority of PASIs:- In light of judgment passed by Peshawar High Court Peshawar in writ petition No. 3720-P/2018 Title Qazi Muhammad Arif VS Govt. of KPK & others as approved by the W/CCPO, Peshawar, the "E" list seniority of the following PASIs is hereby revised w.e from as noted against each:-

S#	Name & No	Date of promotion to List "E"	Date of Revised list "E"
1.	PASI now SI Fazal Akbar No:P/297	27-09-2011	21-09-2007
2.	PASI now [REDACTED]	13-09-2012	21-09-2007

Sd/-
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 17577-84/EC-I

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

1. Addl. Inspector General of Police, Hqrs: Khyber Pakhtunkhwa, Peshawar.
2. Commandant Elite Force KPK, Peshawar.
3. AIG/legal, Peshawar.
4. SSP/Operation & Investigation, Peshawar.
5. DSP/Legal, Peshawar.
6. AS & EC-II, CCP, Peshawar.

(SSP/COORDINATION)
FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.



Office of the Deputy Commandant
Elite Force Khyber Pakhtunkhwa
Peshawar

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EB

No. 262 /EF

Dated: 11/01/2021.

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

Subject: APPLICATION FOR REVISED SENIORITY

Memo:

Kindly refer to your CPO letter No. CPO/CPB/376, dated 10.12.2020 on the subject cited above.

It is submitted that Inspector Fazle Akber No. P/297 was granted revised seniority in List "E" vide Notification No. 5261/EC-I dated 22.02.2019 and Notification No. 17576/EC-I dated 20.10.2020 but his seniority as SI in confirmation was not revised in the light of these Notifications and his request has been filed through letter issued vide memo No. 21576/EC-I dated 18.12.2020 (Copies attached for ready references).

It is, therefore, requested that his seniority in the light of above mentioned Notifications may kindly be revised and his name may kindly be brought on his exact place in the list with his colleagues to avail the benefit, please.

(ZAIBULLAH KHAN) PSP

Deputy Commandant

Elite Force Khyber Pakhtunkhwa Peshawar

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**MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON
06-08-2021 AT MALIK SAAD SHAHED POLICE LINE PESHAWAR.**

A Departmental Promotion Committee meeting was held on 06-08-2021 under the Chairmanship of Senior Superintendent of Police, Coordination CCP, Peshawar to examine and decide the seniority cases of Officers/Officials of Capital City Police, Peshawar.

The following officers attended the meeting:

- | | | |
|----|-----------------------------|-----------------|
| 1. | SSP/Coordination, Peshawar | Chairman |
| 2. | SP/HQrs., Peshawar | Member |
| 3. | Office Supdt. CCP, Peshawar | Member |

The committee thoroughly examined each case and made recommendation as noted against each:

S#	Name and Rank	Present Posting	Decision
1.	Mr. Asad Mehmood DSP/FRP	Kohat	The Committee thoroughly examined and decided to consider his case for revised confirmation in the rank of SI after the receipt of order sheet of Honorable's Service Tribunal KPK, Peshawar, as date 02-09-2021 has been fixed for hearing.
2.	A/DSP Muhammad Ismail Shah.	DSP/CTD	The Committee thoroughly examined his case and recommended him for confirmation in the rank of SI w.e. from 26-11-2013 conditionally/provisionally subject to outcome of CPLA.
3.	A/SP/Muhammad Aleem Jan.	CPO	The Committee thoroughly examined his case and recommended that guidance may be sought from CPO like wise the case of Mardan Region.
4.	Insp: Fazal Akbar	Elite Force	The Committee thoroughly examined his case and recommended him for revised confirmation in the rank of SI w.e. from 25-08-2014 instead of 29-09-2017.
5.	Insp: Imtiaz Alam	CCP, Peshawar	The Committee thoroughly examined his case and filed.
6.	Insp: Raza Bacha	CCP, Peshawar	The Committee thoroughly examined his case and filed.
7.	SI Bilal Hussain	CCP, Peshawar	The Committee thoroughly examined his case and filed.
8.	ASI Nasir Ali No. 952	Mardan	The Committee thoroughly examined his case and recommended him for seniority with his colleagues. His name placed below the name of his "D" list colleagues now offg: SI Noor Muhammad No. 432/P.
9.	HC Ghallib Shah	Special Branch	The Committee thoroughly examined his case and filed.
10.	HC Ghaffoor Shah		The Committee thoroughly examined his case and filed.
11.	IHC Qaiser Khan No. 907	Charsadda	The Committee thoroughly examined his case and recommended him for revised seniority with his colleagues. His name placed below the name of his "D" list colleagues offg: SI Ali Khan No. 459/P.
12.	IHC Nemat Khan No. 999/149	Traffic, Peshawar	The Committee thoroughly examined his case and recommended that his name may be placed at the bottom of C-1 HCs from the date of his lien transfer/ arrival at CCP, Peshawar, i.e. 21-04-2008 below the name of C-1 HC now offg: ASI Naveed No. 792.

Member
[Signature]
OFFICE SUPDT:

Member
[Signature]
SP/HQRS, Peshawar

CHAIRMAN

[Signature]
Senior Superintendent of Police,
Coordination, CCP, Peshawar.



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

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

POLICE DEPTT:

CCP, PESHAWAR.

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

NOTIFICATION.

Dated 16/8/2021.

No. _____/EC-I, REVISED CONFIRMATION IN THE RANK OF SI:- In pursuance of CPO letter No. CPO/CPB/280 dated 14-07-2021 and consequent upon the recommendation of Departmental Promotion Committee meeting held on 06-08-2021, duly approved by the competent authority, the SI confirmation notification of Inspector Fazal Akbar No. P/297 Issued vide this office No. 17588/EC-I, dated 29-09-2017 is hereby revised w.e. from 25-08-2014 instead of 29-09-2017.

Sd/-
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 14587-95/EC-I,

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

1. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police HQrs:, & Elite Force KPK.
3. Deputy Inspector General of Police HQrs: KPK, Peshawar.
4. Asstt: Inspector General of Police Establishment KPK, Peshawar.
5. Asstt: Inspector General of Police Legal CPO, Peshawar.
6. EC-II & AS, CCP, Peshawar.

o/c
FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.

16/8/2021



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Anx DE

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

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

POLICE DEPTT:

CCP, PESHAWAR.

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

NOTIFICATION.

Dated 29/9/2017.

No. 17588/JEC-I, CONFIRMATION IN THE RANK OF SIS:- As per recommendation of Departmental Promotion Committee meeting held on 21-09-2017, the following Offg: Sis of Capital City Police Peshawar is hereby confirmed in rank of Sis with immediate effect:


On confirmation they are allotted new Capital City Police Peshawar number as noted against each:-

S#	Rank, Name & No	Present Posting	New CCP No.	Remarks
1.	Offg: SI Tariq Niaz No. 145/P	Inv: CCP, Peshawar	P/22	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 05 more points.
2.	Off: SI Amir Farzand No. 391/P	CTD KPK	P/71	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 02 more points.
3.	Off: SI Sibghat Ullah No. 437/P	Inv: Peshawar	P/82	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 04 more points.
4.	Off: SI Nazar Ali No. 438/P	Special Branch	P/83	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 09 points.
5.	Off: SI Amir Nawaz No. 440/P	CTD KPK	P/84	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 06 more points.
6.	Off: SI Fazal Rabi No. 493/P	CTD KPK	P/85	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
7.	Off: SI Gehar Ali No. 507/P	CTD KPK	P/86	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.

Notification

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	Off: SI Muhammad Wali No. 510/P		Inv. Peshawar	P/87	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 04 more points.
9.	Off: SI Amir Muhammad No. 515/P		CTD KPK	P/88	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory training / course and will earn 09 points.
10.	Off: SI Nasrat Ali No. 612/P		CTD KPK	P/89	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
11.	Off: SI Noor-ul-Qamarj No. 615/P		Inv. Peshawar	P/90	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 06 more points.
12.	Off: SI Nawab Khan No. 640/P		CTD KPK	P/91	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
13.	Off: SI Tajbar Khan No. 864/P		CTD KPK	P/92	Confirmed.
14.	Off: SI Muhammad Diyar-922/P		CPC, Peshawar	P/93	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 09 points.
15.	Off: SI Inayat Ur Rehman No.923/P		Special Branch	P/94	Confirmed.
16.	Off: SI Ghulam Sarfar No. 1115/P		CTD KPK	P/95	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
17.	Off: SI Inam Ullah No:948/P		CTD KPK	P/96	Confirmed.
18.	Off: SI Sajawal No.1130/P		CTD KPK	P/97	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
19.	Off: SI Karim Dad No.1131/P		CTD KPK	P/98	Confirmed.
20.	Off: SI Sawal Faqir No.988/P		CTD KPK	P/99	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
21.	Off: SI Yahya Shah No. 1136/P		CTD KPK	P/100	Confirmed
22.	Off: SI Jamshid No.11/P		Inv: CCP, Peshawar	P/101	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.


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23.	Off: SI Muhammad Ishaq No.1147/P	CTD KPK	P/102	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 02 more points.
24.	Off: SI Muhammad Rizq No.1149/P	CTD KPK	P/103	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
25.	Off: SI Ghulam Ali No.1150/P	CTD KPK	P/104	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
26.	Off: SI Rizwan Ullah No.1154/P	Charsada	P/105	Confirmed. However, according to Standing Order 03/2015, he will complete and qualify mandatory Training / course and will earn 07 more points.
27.	Off: SI Muhammad Naaz No.1156/P	CTD KPK	P/106	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
28.	Off: SI Yousuf Ali No.1158/P	Charsada	P/107	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
29.	Off: SI Mujahid Shah No.1315/P	CTD KPK	P/108	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
30.	Off: SI Muhammad Bashir No.1027/P	Special Branch	P/109	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
31.	Off: SI Fazal Dyan No.1164/P	CTD KPK	P/110	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more points.
32.	Off: SI Burhan-Un-Din No. 1033/P	Inv. Peshawar	P/111	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 06 more points.
33.	Off: SI Muhammad Sabir No.1034/P	Inv. Peshawar	P/112	Confirmed.
34.	Off: SI Fazil Rokhan No.1167/P	CTD KPK	P/113	Confirmed.
35.	Off: SI Hassan Gul No.1036/P	CTD KPK	P/114	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 0 more point.

Notification

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36.	Off: SI Muhammad Ibrahim No.1046/P	CCP, Peshawar	P/115	Confirmed. However, according to Standing Order 03/2015, he will complete and qualify mandatory Training / course and will earn 04 more points.
37.	Off: SI Tilawat Shah No. 1171/P	Inv: Peshawar	P/116	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 0 more points.
38.	Off: SI Fazal Rabi No.1048/P	Inv: Peshawar	P/117	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 06 more points.
39.	Off: SI Akhtar Ali No.1172/P	Special Branch	P/120	Confirmed.
40.	Off: SI Falz Ullah No.1049/P	Inv: CCP, Peshawar	P/121	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 07 more points.
41.	Off: SI Alam Zeb No. 1051	Special Branch	P/122	Confirmed. However, according to Standing Order 03/2015, he will complete and qualify mandatory Training / course and will earn 08 more points.
42.	Off: SI Fazli Elahi No.1177/P	Special Branch	P/123	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 08 more points.
43.	Off: SI Mian Mohib Jan No.1055/P	Invest: CCP, Peshawar	P/124	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 08 more points.
44.	Off: SI Muhammad Tabreez No.1184/P	CTD KPK	P/127	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
45.	Off: SI Sher Muhammad No.1186/P	CTD KPK	P/128	Confirmed.
46.	Off: SI Amir Nawab No. 1071/P	Special Branch	P/129	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 06 more points.
47.	Off: SI Ghafir Ullah No.1073/P	Charsadda	P/130	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 08 more points.
48.	Off: SI Ghaffar Ali No.1188/P	Charsadda	P/133	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 05 more points.

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49.	Off: SI Farukh Zade No.1074/P	CTD KPK	P/135	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
50.	Off: SI Shahjee Hussain No.1080/P	Special Branch	P/136	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 09 points.
51.	Off: SI Umar Shah No.1084/P	Inv: Peshawar	P/144	Confirmed.
52.	Off: SI S. Sardar Ali Shah No.1085/P	CCP, Peshawar	P/157	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 05 more points.
53.	Off: SI Akhtar Hussain No. 1086/P	Inv: CCP, Peshawar	P/163	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
54.	Off: SI Daud Jan No. 1087/P	CCP, Peshawar	P/198	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 07 more points.
55.	Off: SI Waris Khan No. 1089/P	CCP, Peshawar	P/199	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 06 more points.
56.	Off: SI Masood Khan No. 1191/P	Traffic KPK	P/200	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 08 more points.
57.	Off: SI Sehat Ali No. 1090	Special Branch	P/247	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 09 points.
58.	Off: SI Muhammad Jan No. 1095/P	CCP, Peshawar	P/248	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 04 more points.
59.	Off: SI Muhammad Humayun No.1197/P	CCP, Peshawar	P/249	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 09 points.
60.	Off: SI Waris Khan No. 1101	Inv: CCP, Peshawar	P/252	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 05 more points.

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Notification

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61.	Offg: SI Riaz Ali Shah No. 1007/P	CCP, Peshawar	P/291	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 02 more points.
62.	Off: SI Fazal Akbar No. 1010/P	CCP, Peshawar	P/297	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 05 more points.
63.	Off: SI Syed Khalid Shah No. 568/P	CCP, Peshawar	P/298	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 04 more points.
64.	Off: SI Irfan No. 569/P	CCP, Peshawar	P/299	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 04 more points.
65.	Off: SI Naeem Halder Khan No. 570/P	CCP, Peshawar	P/300	Confirmed.
66.	Off: SI Imran Alam No. 574/P	CCP, Peshawar	P/315	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 03 more points.
67.	Offg: SI Khalid Anwar No. 572/P	Special Branch	P/334	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 09 points.
68.	Off: SI Ahmad Rashid No. 573/P	Inv: CCP, Peshawar	P/36	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
69.	Offg: SI Muhammad Abid Afridi No. 576/P	CCP, Peshawar	P/337	Confirmed.
70.	Offg: SI Shakir Ullah No. 577/P	CCP, Peshawar	P/340	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 01 more point.
71.	Off: SI Gul Dad Khan No. 1215/P	PTC Hangu	P/341	Confirmed. However, according to Standing Order 03/2015 he will complete and qualify mandatory Training / course and will earn 05 more points.

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Offg: SI Taj-ud-Din: No. 890/P of Investigation wing Capital City Police, Peshawar is hereby deferred from confirmation in the rank of SI due to incomplete mandatory period under Police Rules 13.10(2).

Notification

Those SIs who's have not completed Mandatory Training/Courses under standing order No. 3/2015 working under your command may be selected for the said courses on priority basis to earn marks noted against each. After completion of their courses reports may be sent to this office for completion of record please.

1-2
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

No. 17589-17605 /EC-I.

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

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar, alongwith two spare copies for Publication, KPK, Gazette Notification part-II.
3. Addl: Inspector General of Police, Special Branch KPK, Peshawar.
4. Deputy Inspector General of Police Traffic KPK, Peshawar.
5. Deputy Inspector General of Police, CTD KPK, Peshawar.
6. Deputy Inspector General of Police Mardán Region.
7. Commandant FRP, Peshawar.
8. Commandant Police Training College Hangu.
9. SSp/Operation, Investigation & Traffic, Peshawar.
10. District Police Officers Charsadda.
11. Superintendent of Police FRP Kohat.
12. Director CPC University Campus, Peshawar..
13. Asstt: Secret Branch, & EC-II, CCP, Peshawar.

Notification



(17)

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR
PIR: 091-9210239 Fax: 091-9210239

Date: Peshawar the, 30. 03. 2023

NOTIFICATION

No. 1541 /E-II, CONFIRMATION AS INSPECTOR:- As per recommendation of the DPC dated 08.12.2022, duly approved by the Worthy Addl: Inspector General of Police HQrs Khyber Pakhtunkhwa, the following Officiating Inspectors are hereby confirmed as Inspector from the date as noted against each their names:-

S.NO	NAME & NO.	REGION	D.O CONFIRMATION
01	Saira Saleh No.P/15	Peshawar	22.10.2021
02	Ihsanullah No.P/358	Peshawar	12.12.2020
03	Darwesh Khan No.P/24	Peshawar	12.12.2020
04	Fazal Hiraaj No.MR/129	Mardan	12.12.2020
05	Umar Daraz Khan No.51/118	Mardan	12.12.2020
06	Mukhtiar Ullah No.P/31	Peshawar	12.12.2020
07	Asif Sharif No.P/223	Peshawar	05.11.2016
08	Tariq Umar No.P/21	Peshawar	22.10.2021
09	Zewar Khan No.66/M	Malakand	22.10.2021
10	Ghulam Nurtaza No.K/69	Kohat	05.11.2016
11	Riaz Muhammad No.Af/7/B	Malakand	22.10.2021
12	Muhammad Nawaz Khan No.MR/120	Mardan	12.12.2020
13	Qazi Aslam No.P/34	Peshawar	22.10.2021
14	S. M. Malik No.P/249	Peshawar	16.04.2022
15	Jan Alam Khan P/401	Peshawar	12.12.2020
16	Jehanzeb No.P/371	Peshawar	12.12.2020
17	Ashfaq Alam No.P/372	Peshawar	12.12.2020
18	Azizullah No.P/373	Peshawar	12.12.2020
19	Bakht Zah No.P/37	Peshawar	12.12.2020
20	Musa Khan No.P/374	Peshawar	12.12.2020
21	Ishah-ud-Din No.P/375	Peshawar	12.12.2020
22	Zakirullah No.P/75	Peshawar	12.12.2020
23	Muhammad Diyar No.P/93	Peshawar	16.04.2022
24	Inayat-ur-Rehman No.P/94	Peshawar	16.04.2022
25	Umer Sher No.P/90	Peshawar	12.12.2020
26	Muhammad Nawaz No.P/42	Peshawar	12.12.2020
27	Fazal Akbar No.P/297	Peshawar	28.12.2022
28	Muhammad Israr No.P/145	Peshawar	28.12.2022

(DR. ZAHID ULLAH), PSP
ATG/Establishment,
Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Encls: No. & date even.

Copy forwarded to the:-

1. All Heads of Units in Khyber Pakhtunkhwa.
2. All Regional Police Officers, in Khyber Pakhtunkhwa.
3. Capital City Police Officer, Peshawar.
4. PA to the Addl: Inspector General of Police HQrs Khyber Pakhtunkhwa.
5. Office Supdt: Secret, Career Planning Branch, CPO.
6. UOP files.

BETTER COPY

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OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR
PH: 091-9210239 Fax: 091-9210239

Dated Peshawar the, 30.03.2023

NOTIFICATION

No.194/E-II, CONFIRMATION AS INSPECTOR:- As per recommendation of the DPC dated 08.12.2022, duly approved by the worthy Addl: Inspector General of Police HQrs Khyber Pakhtunkhwa, the following Officiating Inspector_s are hereby confirmed as Inspector from the date as noted against each their names:-

S.NO	NAME & NO.	REGION	D.O CONFIRMATION
01	Saira Saleh No.P/15	Peshawar	22.10.2021
02	Ihsanullah No.P/358	Peshawar	12.12.2020
03	Darwesh Khan No.P/24	Peshawar	12.12.2020
04	Fazal Miraj No.MR/124	Mardan	12.12.2020
05	Umar Daraz Khan No.51/MR	Mardan	12.12.2020
06	Mukhtiar Ullah No.P/31	Peshawar	12.12.2020
07	Asif Sharif No.P/223	Peshawar	05.11.2016
08	Tariq Umar No.P/21	Peshawar	22.10.2021
09	Zewar Khan No.66/M	Malakand	22.10.2021
10	Ghulam Murtaza No.K/69	Kohat	05.11.2016
11	Riaz Muhammad No.468/M	Malakand	22.10.2021
12	Muhammad Nawaz Khan No.MR/120	Mardan	12.12.2020
13	Qazi Aslam No.P/34	Peshawar	22.10.2021
14	Sher Malik No.P/249	Peshawar	16.04.2022
15	Jan Alam No.P/401	Peshawar	12.12.2020
16	Jehanzeb No.P/371	Peshawar	12.12.2020
17	Ashfaq Alam No.P/372	Peshawar	12.12.2020
18	Azizullah No.P/373	Peshawar	12.12.2020
19	Bakht Zali No.P/37	Peshawar	12.12.2020
20	Musa Khan No.P/374	Peshawar	12.12.2020
21	Islah-ud-Din No.P/375	Peshawar	12.12.2020
22	Zakirullah No.P/75	Peshawar	12.12.2020
23	Muhammad Diyar No.P/93	Peshawar	16.04.2022
24	inayat-ur-Rehman No.P/94	Peshawar	16.04.2022
25	Umer Sher No.P/40	Peshawar	12.12.2020
26	Muhammad Nawaz No.P/42	Peshawar	12.12.2020
27	Fazal Akbar No.P/297	Peshawar	28.12.2022
28	Muhammad Israr No.P/145	Peshawar	28.12.2022

Sd/-
(DR. ZAHID ULLAH), PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & date even.

Copy forwarded to the:-

1. All Heads of Units in Khyber Pakhtunkhwa.
2. All Regional Police Officers, in Khyber Pakhtunkhwa.
3. Capital City Police Officer, Peshawar.
4. PA to the Addl: Inspector General of Police HQrs Khyber Pakhtunkhwa.
5. Office Supdt: Secret, Career Planning Branch, CPO.
6. UOP files.

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**Before the Provincial Police Officer, Khyber Pakhtunkhwa,
Peshawar**

Subject:- Appeal for Ante-dation of Notification dated 30-03-2023

Respectfully Submitted:-

That the appellant was initially appointed as Assistant Sub Inspector on 29-09-2007, was promoted to List "E" and then promoted as Officiating Sub Inspector and later on his Promotion to List "E" and promotion as Officiating Sub Inspector was revised w.e.f. 27-9-2011 instead of 12-11-2013 vide Notification dated 22-02-2019 and subsequent to the Judgment of Peshawar High Court his List "E" Seniority was revised w. e.f. 21-09-2007 instead of 27-09-2011. Upon request seniority as Sub Inspector was revised w.e.f 25-08-2014 instead of 29-09-2017 vide Notification dated 16-08-2021. The colleagues rather juniors to the appellant were promoted as Officiating Inspectors on 19-10-2015 and were confirmed as Inspectors on 19-10-2017 while the appellant was promoted as Officiating Inspector on 28-12-2020 for no fault and was confirmed as Inspector vide Notification dated 30-03-2023 w.e.f. 20-12-2022. The appellant is entitled to be confirmed as inspector w.e.f. 19-10-2017, as he has been deprived for no fault from his due right and has been discriminated. Due to late confirmation the appellant was not promoted as DSP (BPS-17) while juniors to him were promoted as DSP,s, though the appellant had qualified the requisite training/course mandatory for promotion to the rank of DSP.

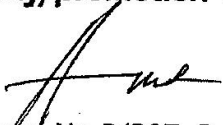
That the appellant being perfectly fit, eligible, senior and coming up to the criteria is entitled to be confirmed as Inspector with his colleagues and the appellant could not be deprived of his seniority and promotion for no fault, as per plethora of Judgments of the Apex Court, High Court as well as of the honorable KP Service Tribunal.

It is therefore requested that on acceptance of this appeal, the Notification dated 30-03-2023 may kindly be given effect from 19-10-2017 to the extent of the appellant thereby confirming the

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appellant as Inspector with further seniority/promotion with his colleagues, with all back benefits.

Dated:-15-03-2024


Fazal Akbar, No P/297, Inspector,
Presently Acting DSP Mardan,
Region Mardan.
Cell # 03108837133

(20)

بعدالت

XPS7 Retardant

APR 2024
بنام

قصہ الیکٹرونک

موزوں
مقدمہ
دعویٰ
جزم

باعث تحریر آئینک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام 20 کیلئے مقرر شدہ APR 2024
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری بیکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانا التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

الرقوم 28
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وہ الب

بمقام

Alia & Accepted
Ad