

Next Date Before *comp court*
D. J. Khan
19-8-2024

BEFORE THE HONOURABLE SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 14444/2020

Ahmad Saeed

03463956666

Versus

Govt of Khyber Pakhtunkhwa and others

REJOINDER ON BEHALF OF APPELLANT

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Dated: 11/05/2024

Yours Humble Appellant



Ahmad Saeed
Through Counsel.



Sheikh Iftikhar ul Haq
Advocate Supreme Court

1

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 14444/2020

Ahmad Saeed

Versus

Govt of Khyber Pakhtunkhwa and others

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 13757

Dated 24-06-2024

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth:-

The appellant humbly submits the following rejoinder jointly on facts and grounds as follows;

The answering respondents has been appointed on the same footings one the colleagues of the appellant namely Ghulam Khan to the post of Work Superintendent from the post of Tube Well operator and the appellant submits before this Honourable tribunal that the appellant may also be appointed from the post of Tube Well Operator to the post of Work Superintendent and be similar treated and no discrimination be made because the appellant is more qualified as his colleague Ghulam Khan was qualified.

The appointment order of Ghulam Khan and Minutes along with other documents are annexed as **Annexure-R/1**.

The policies/notifications in this respect of departmental promotion are annexed as **Annexure-R/2**.

It is therefore, humbly prayed that appeal of the appellant may kindly be accepted as prayed for in the head note of the main appeal.

Any other relief deems appropriate may please be given to the appellant.

Dated: 11/06/2024


Sheikh Iftikhar ul Haq
Advocate Supreme Court

Yours Humble Appellant


Ahmad Saeed
Through Counsel

2

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 14444/2020

Ahmad Saeed

Versus

Govt of Khyber Pakhtunkhwa and others

REJOINDER ON BEHALF OF APPELLANT

AFFIDAVIT

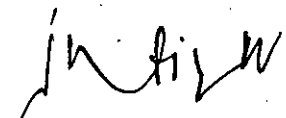
I, **Ahmad Saeed** son of Muhammad Khan presently serving as Operator Cum Chowkidar in Public Health Department Dera Ismail Khan, the appellant, do hereby solemnly affirm and declare on Oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief; and nothing has been deliberately concealed from this Honourable Court.

Dated: 11/05/2024

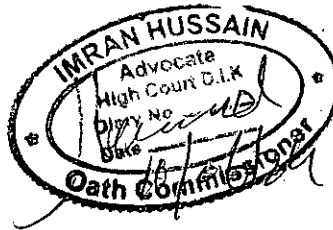


DEPONENT

Identified by:



Sheikh Iftikhar ul Haq
Advocate Supreme Court



3

Ann - 'R/1'

**OFFICE OF THE SUPERINTENDING ENGINEER,
PUBLIC HEALTH ENGINEERING CIRCLE KOHAT**

No. 34 /SE/PHE/16

Dated Kohat, the 7 /18 /2014.

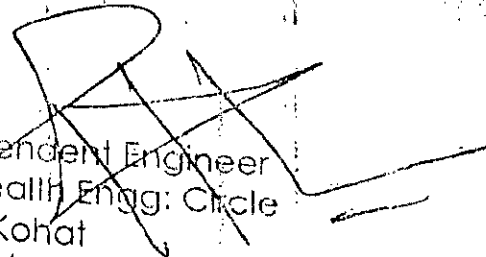
OFFICE ORDER.

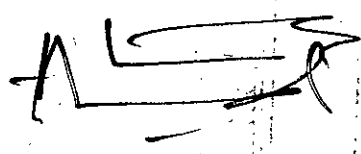
Mr. Ghulam Khan Work Superintendent already reverted vide this office letter No.02/S.E/PHE/06 dated 29/04/2014 is hereby withdrawn and promoted to the Post of Work Superintendent BPS-09 as decided by District Selection Committee meeting held on 05-08-2014. *minutes attached*

Superintendent Engineer
Public Health Engg: Circle
Kohat

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

1. ✓ The Chief Engineer (South) PHE Department Peshawar for information please.
2. ✓ The Executive Engineer PHE Division Karak for information.
3. ✓ The District Accounts Officer Karak.
4. The official concerned.


Superintendent Engineer
Public Health Engg: Circle
Kohat



4

' Better copy '

**OFFICE OF THE SUPERINTENDING ENGINEER,
PUBLIC HEALTH ENGINEERING CIRCLE KOHAT**

No.04/SE/PHE/6

Dated Kohat, the 07/08/2014.

OFFICE ORDER.

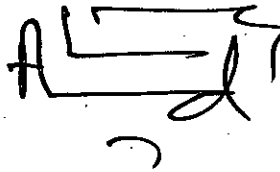
Mr. Ghulam Khan Work Superintendent already reverted vide this since letter No.02/S.E/PHE/06 dated 29/04/2014 is hereby withdrawn and promoted to the post of Work Superintendent BPS-09 as decided by District Selection Committee meeting held on 05/08/2014.

Superintendent Engineer
Public Health Engg: Circle
Kohat

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

1. The Chief Engineer (South) PHE Department Peshawar for information please.
2. The executive Engineer PHE Division on Karak for information.
3. The District Accounts Officer Karak.
4. The official concerned.

Superintendent Engineer
Public Health Engg: Circle
Kohat



5

**MINUTES OF THE DISTRICT SELECTION/PROMOTION COMMITTEE
MEETING HELD ON 18/07/2014.**

In light of Chief Engineer (S) PHED letter NO. 17/B-5/PHE dated 23-06-2014, a meeting of District Selection/Promotion Committee was called on 18-07-2014 under the chairmanship of Mr. Ghulam Mujtaba Khan, Superintending Engineer PHE Circle Kohat. The following attended the meeting.

- | | | |
|----|--|------------|
| 1. | Mr. Ghulam Mujtaba Khan Superintending Engineer | Chairman. |
| 2. | Mr. Gul Shahid Khan XEN PHE Division Karak | Member. |
| 3. | Mr. Masood Ur-Rehman ^{Kohat} XEN PHE Division Kohat.
Representative of Secretary PHED. | Member. |
| 4. | Mr. Khurshid, Assistant | Secretary. |

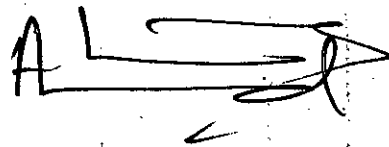
The committee discussed the item of agenda in length and threadbare discussion made on the case of reversion of Mr. Ghulam Khan Work Superintendent to the post of Tube Well Operator. The committee has been put the following additional documents/record submitted by the above name official with his departmental appeal:

1. Decision of Court of Commissioner Kohat Division Kohat made in his promotion case filed by Guizari Khan S/o Amal Baig.
2. Qualification having Master Degree.
3. Length of Service (about 28 Years) since his appointment date i.e 29-09-1986.

FINDING.

The Departmental Selection/Promotion Committee is come to the conclusion of the case as under:-

1. The official has highly qualified and there was no criteria of promotion in vogue at the time of his promotion.



6

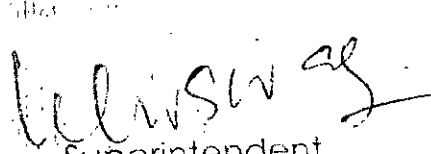
- No seniority list was maintained at the time of his promotion by the Department. Now he is at 21 No. out of 24 (letter attached).
3. The Court of Commissioner Kohat Division Kohat has declared the promotion is valid in his decision made in the case of Gulzari Khan filed against the promotion of Ghulam Khan.
 4. Length of service (about 28-Years)) since his appointment date i.e 25-09-1986.

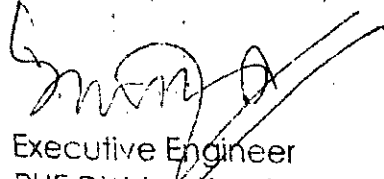
DECISION.

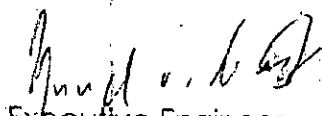
Keeping in view the above facts the forum anonymously recommended withdrawal of reversion decision of the official previously made by the DSC in his meeting held on 10-04-2014 and to restore him on the post of Work Superintendent from the date of his reversion on humanitarian grounds any how the DCO was not competent.


Further an undertaking will be submitted by Ghulam Khan where he will vacate the post of Work Superintendent if Malik Ayaz Now Head Clerk is reverted as enquiry proceedings.

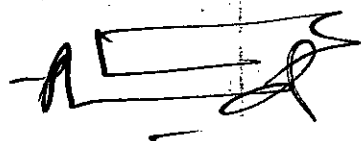
Ghulam Khan then also be reverted to post of operator simultaneously.


Superintendent
PHE Circle Kohat.
(Secretary)


Executive Engineer
PHE Division Karak
(Member)


Executive Engineer
PHE Division Kohat
Representative of
Secretary PHED
(Member)


Superintending Engineer
PHE Circle Kohat.
(Chairman)



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Or acceptance of the Service Appeal, the
in signed orders passed by Respondents No. 1
at 3 may be done with all work and

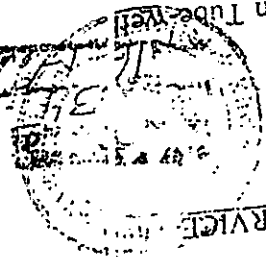
Payee:-

RE: REJECTIVELY
ENCLOSED AS ANNEXURE A & B
OF THE INIGNED ORDERS ARE
OF APPELLANT WAS REJECTED. COPIES
VIDE WHICH DEPARTMENTAL APPEAL
RESPONDENT NO. 2 DATED 19.12.2014
TUBE-WELL OPERATOR AND ORDER OF
SUPERINTENDENT TO THE POST OF
REVERTED FROM THE POST OF WORK
VIDE WHICH APPELLANT WAS
RESPONDENT NO. 3 DATED 30.10.2014
THE AGAINST THE ORDER OF
LOWER (KPK) SERVICE TRIBUNAL ACT
AN APPEAL UNDER SECTION 4 OF THE
..... (Defendants)

Eng. Mervin Department District Karak
Executive Engineer Public Health
Engineering Department Circle Kohat
Superintendent Engineer Public Health
Pakhtunkhwa, Peshawar
Engineering Department Khyber
Chief Engineer (Sons) Public Health
Department Peshawar
through Secretary Public Health Engineering
Government of Khyber Pakhtunkhwa
Versus

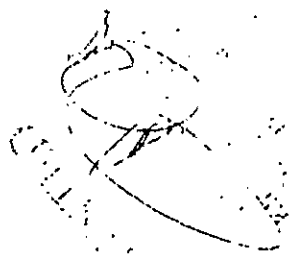
Ghulam Khan son of Muhammad Ayub Khan Tube-well
Operator Public Health Engineering Department District
Karak (Appellant)

Service Appeal No. 48/2015



THE HON'BLE THE CHIEF JUSTICE
Tribunal Peshawar

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service appeal No. 48/2015.

Ghulam Khan son of Muhammad Ayub Khan Tube well operator Public
Health Engineering Department District Karak.

..... (Appellant).

VERSUS

1. Government of Khyber Pakhtunkhwa Through Secretary Public Health Engineering Department Peshawar.
2. Chief Engineer South Public Health Engineering, Department Khyber Pakhtunkhwa Peshawar.
3. Superintendent Engineer Public Health Engineering Department Circle Kohat.
4. Executive Engineer Public Health Engineering Department Circle Kohat.

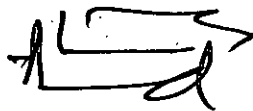
..... (Defendants).

Subject:-

**AN APPEAL UNDER SECTION 4 OF THE NWFP (KPK)
SERVICE TRIBUNAL ACT 4 AGAINST THE ORDER OF
RESPONDENT NO.1 DATED 30/10/2014 VIDE WHICH
APPEALANT WAS REVERTED FROM THE POST OF
WORK SUPERINTENDENT TO THE POST OF TUBE-
WELL OPERATION AND ORDER OF RESPONDENT
NO.2 DATED 19/12/2014 VIDE WHICH DEPARTMENTAL
APPEAL OF APPELANT WAS REJECTED COPIES OF
THE IMPUGNED ORDERS ARE ENCLOSED AS
ANNEXURE-A&B RESPECTIVELY.**

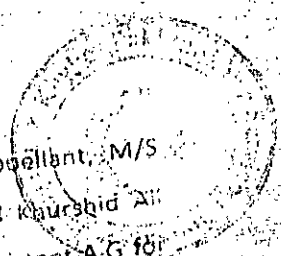
Prayer:-

On acceptance of service appeal, the impugned orders passed Respondent No.2 and 3 may kindly be set aside and the service of appellant be restored.



9

15.07.2015



Appellant alongwith agent of counsel for the appellant, M/S Muhammad Yasin, Supdt., Muhammad Iqbal, Supdt. and Khurshid Ali Shah, Assistant alongwith Mr. Kabirullah Khan Khattak, Assistant A.G. for respondents present. Office order No. 1 dated 13.7.2015 alongwith office order dated 7.8.2014 submitted and placed on record according to which the appellant is reinstated to the post of Work Superintendent (BPS-9)

Appellant informed the Tribunal that his grievances have been redressed and therefore he be allowed to withdraw the appeal. The same is dismissed as withdrawn. File be consigned to the record.

Sd/-
Chairman

ANNOUNCED
15.7.2015

Certified true copy

12.8.2015
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~~12.8.2015~~
~~12.8.2015~~

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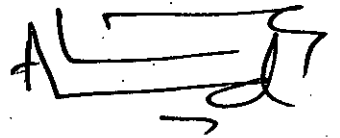
15/07/2015:

Appellant along with agent of counsel for the appellant, M/S Muhammad Yasin, Supdt. Muhammad Iqbal, Supdt. and Khurshid Ali Shah Assistant along with Mr. Kabirullah Khan Khattak, Assistant A.G for respondents present. Office order No 1 dated 13/07/2015 along with office order dated 07/08/2014 submitted and placed on record according to which the appellant is reinstated to the post of work superintendent (BPS-9)

Appellant informed the Tribunal that his grievances have been redressed and therefore he be allowed to withdraw the appeal. The appeal dismissed as withdrawn. File be consigned to the record.

ANNOUNCED
15.07.2015

-Sd-
Chairman



Dated Peshawar the March 6, 2010.

Ann - R/2

NOTIFICATION

No.SO(Estt)/PHED/1-9/2010 In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil servants (Appointment, Promotion and Transfer) Rules, 1989 and in super-session of all previous notifications issued in this behalf, the Public Health Engineering 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 No. 3 to 5 of the Appendix appended to this Notification which shall be applicable to the post as mentioned in Column No. 2 of the said Appendix.

(ENGR. AHMAD JAN)
SECRETARY TO GOVT: OF NWFP
PUBLIC HEALTH ENGG: DEPARTMENT

Endst: No.SO(Estt)/PHED/1-9/2010

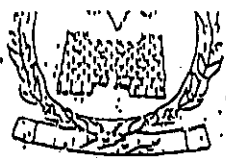
Dated Peshawar, the March 6, 2010.

Copy forwarded for information to the:-

1. All Administrative Secretaries, Govt. of NWFP Peshawar.
2. Secretary to Governor NWFP.
3. Secretary to Govt: of NWFP, Establishment (E&A) Department Peshawar.
4. Secretary to Govt: of NWFP, Law Department Peshawar.
5. Principal Secretary to Chief Minister NWFP Peshawar
6. PS to Chief Secretary NWFP Peshawar.
7. PS to Additional Chief Secretary NWFP Peshawar.
8. PS to Additional Chief Secretary Home NWFP Peshawar.
9. PS to Additional Chief Secretary FATA Peshawar.
10. Accountant General NWFP Peshawar
11. Additional Accountant General, (PR) Sub Office Peshawar.
12. Chief Engineer (South/North)PHE Department NWFP Peshawar
13. Secretary Public Service Commission Peshawar w/r to his letter No.NWFP/PSC/Li/2010/08527 dated 12-02-2010.
14. Registrar Peshawar High Court Peshawar.
15. Registrar N.W.F.P. Services Tribunal Peshawar.
16. All Superintending Engineers PHE Department NWFP.
17. All Executive Engineers PHE Department NWFP.
18. PS to Secretary PHE Department NWFP Peshawar.
19. Office Order File.
20. Manager Government Printing Press NWFP Peshawar. He is requested to supply 50 copies of the printed gazette for further distribution.

Ahmad Jan
Section Officer (Estt)
Public Health Engrg: Department
Khyber Pakhtunkhwa

Ahmad Jan



12

Dated Peshawar, the December 6, 2010

NOTIFICATION

No. SO(E)PHE/1-9/2009. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Public Health Engineering Department, in consultation with the Establishment Department and Finance Department, hereby directs that in this department's Notification No. SOE/PHE/1-9/2010, dated 06-03-2010, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

- (i) against serial No. 2 and 3, in column No. 5, the word and brackets, "(Civil)" shall be deleted;
- (ii) against serial No. 4, in column No. 5, for the existing entry, the following shall be substituted, namely:
 - (a) Five percent by promotion, on the basis of seniority-cum-fitness; from amongst the Direct Graduate Sub Engineers, who possessed Degree of B.E/B.Sc Engineering (Civil) from a recognized University;
 - (b) five per cent by promotion, on the basis of seniority-cum-fitness from amongst the in-service Graduate Sub Engineers, who possessed Degree of B.E/B.Sc Engineering (Civil) from a recognized University;
 - (c) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers, who hold a Diploma in Civil / Electrical / Mechanical Technology and have passed Departmental Professional Examination with at least ten years service as such; and
 - (d) seventy percent by initial recruitment."
- (iii) against serial No. 5 in column No. 5, for the existing entry, the following shall be substituted, namely:
 - (a) ninety-five per cent by initial recruitment having Diploma of Associate Engineering (Civil) from a recognized Technical Institution;
 - (b) One per cent by initial recruitment having Diploma of Associate Engineering (Electrical) from a recognized Technical Institution.
 - (c) two per cent by initial recruitment having Diploma of Associate Engineering (Mechanical) from a recognized Technical Institution; and
 - (d) two per cent by transfer, from amongst the Draftsmen with at least seven years service as such, having Diploma of Associate Engineering (Civil) from a recognized Technical Institution.

By
Assis
such.

13

... column No. 3, for the existing entry, the following shall be substituted, namely:
... basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers having five years service as

Note:- A joint seniority list of Assistants / Senior Scale Stenographers shall be maintained for the purpose of promotion. The seniority shall be reckoned from the date of regular appointment to the post of Assistant and Senior Scale Stenographer respectively. In case of same date of appointment, Assistant shall rank senior."

(v) against serial No.11,-

(a) in column No.2, for the existing entry, the following shall be substituted, namely;

"Accounts Clerk / Senior Clerk"; and

(b) in column No.5, for the words "Senior Clerks with five", the words "Junior Clerks with three", shall be substituted.

(vi) entries against serial No.12 shall be deleted;

(vii) against serial No.13, in column No.3, for the existing entry at clause (a), the following shall be substituted, namely;

"(a) Second class Secondary School Certificate from a recognized Board; and"; and

(viii) against serial No.19, in column No.3, for the existing entry, the following shall be substituted, namely;

"Second class Bachelor's Degree from a recognized University, with one year Diploma in Information Technology from a recognized Board of Technical Education."

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
PUBLIC HEALTH ENGINEERING DEPARTMENT

ENDST: No. SO(E)PHE/1-9/2009

Dated Peshawar, the December 6, 2010

Copy forwarded to the:-

1. All Administrative Secretaries to the Govt. of Khyber Pakhtoonkhwa Province.
2. Secretary to Governor Khyber Pakhtoonkhwa Province.
3. Principal Secretary to Chief Minister Khyber Pakhtoonkhwa Province.
4. PS to Chief Secretary Khyber Pakhtoonkhwa Province.
5. Accountant General Khyber Pakhtoonkhwa Province Peshawar.
6. Additional Accountant General (PR), Pakistan Revenue Sub-Office Peshawar.
7. Chief Engineer (North & South) PHE Department.
8. Secretary Public Service Commission.
9. Registrar Peshawar High Court / Services Tribunal Peshawar.
10. All Superintending Engineers PHE Circles / XENs PHE Department.
11. Manager Government Stationary & Printing Department.
12. PS to Secretary / DS (Admn) PHE Department.



14

Dated Peshawar, the July 31, 2013

3

NOTIFICATION

No.SO(E)PHE/1-9/2009. In pursuance of the provisions contained in sub-rule(2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Government of the Khyber Pakhtunkhwa is pleased to direct that in the Public Health Engineering Department's (Recruitment and Appointment) Rules, 2010, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

- i) Against serial No.3, in column No.5, for the existing entry, the following shall be substituted, namely:
 "By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Engineers, Assistant Design Engineers and Sub Divisional Officers; who possess Degree in B.E/B.Sc Engineering (Civil) from a recognized University with five years service as such and have passed the Departmental Professional Examination."
- ii) Against serial No.4, in column No.5; for the existing entries, the following shall be substituted, namely:
 - (a) five per cent, by promotion, on the basis of seniority-cum-fitness, from amongst the direct graduate Sub Engineers, who possess Degree in B.E/B.Sc Engineering (Civil) from a recognized University with five years service as such;
 - (b) five per cent, by promotion, on the basis of seniority-cum-fitness, from amongst the in service graduate Sub Engineers, who possess Degree in B.E/B.Sc Engineering (Civil), from a recognized University with five years service as such;
 - (c) three per cent, by promotion, on the basis of seniority-cum-fitness, from amongst Sub Engineers, who possess Degree in B.Tech Hons. (Civil), from a recognized University with five years service as such;
 - (d) twenty per cent, by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers, who possess Diploma in Civil / Electrical / Mechanical Technology with ten years service as such and have passed the Departmental Examination; and
 - (e) sixty-seven per cent by initial recruitment".

15

ENDST: No. SO(E)PHE/1-9/2009 Dated Peshawar, the July 31, 2013

Copy forwarded to the:-

1. All Administrative Secretaries to the Govt. of Khyber Pakhtunkhwa Province.
2. Secretary to Governor Khyber Pakhtunkhwa Province.
3. Principal Secretary to Chief Minister Khyber Pakhtunkhwa Province.
4. PS to Chief Secretary Khyber Pakhtunkhwa Province.
5. Accountant General Khyber Pakhtunkhwa Province Peshawar.
6. Additional Accountant General (PR), Pakistan Revenue Sub Office Peshawar.
7. Chief Engineer (South) PHE Department.
8. Chief Engineer (North) PHE Department.
9. Chief Engineer (FATA) Communication & Works Department.
10. Secretary Public Service Commission Khyber Pakhtunkhwa.
11. Registrar Supreme Court of Pakistan / Peshawar High Court / Service Tribunal Peshawar.
12. All SuperIntending Engineers PHE Circles / Executive Engineers PHE Divisions / Sub Divisional Officers PHE Khyber Pakhtunkhwa.
13. Manager Government Stationary & Printing Department.
14. PS to Minister for PHE Department.
15. PS to Secretary PHE Department.
16. Office Order File

Muhammad Yunus
31/7/13

(MUHAMMAD YUNAS)
SECTION OFFICER (ESYT)

AL


16

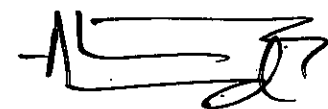
GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE
PUBLIC HEALTH ENGINEERING DEPARTMENT

NOTIFICATION

Peshawar, dated: 06.02.2010.

10. SO (E.S.H. (P.H.ED) 1-9/2010 in pursuance of the provisions contained in sub-rule (2) of rule 3 of the North-West Frontier Province (Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous notifications issued in this Public Health Engineering 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 No. 3 to 5 of the Appendix appended to this Notification shall be applicable to the post as mentioned in Column No. 2 of the said Appendix.


Section Officer (Estt)
Public Health Engg. Department
Khyber Pakhtunkhwa



APPENDIX

S.No.	Nomenclature of post.	Minimum qualification required for appointment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	

1. Engineering Cadre:

1.	Chief Engineer (BS-20).			By promotion, on the basis of seniority-cum-merit, from amongst the Engineers/Directors Design/Directors (Planning and Monitoring) with at least service in BS-17 and above, possessing degree in B.E/B.Sc Engineering in recognized University.
2.	Superintending Engineer / Director Design / Director (Planning and Monitoring) (BS-19).			By promotion, on the basis of seniority-cum-fitness, from amongst the Executive Design Engineers/Technical Officers with twelve years of service in E possessing degree in B.E/B.Sc Engineering (Civil) from a recognized University.
3.	Executive Engineer/ Design Engineer/ Technical Officer (BS-18).			By promotion, on the basis of seniority-cum-fitness, from amongst the Executive Design Engineers/Assistant Design Engineers/Sub-Engineers' Division possessing degree in B.E/B.Sc Engineering (Civil) from a recognized University with years service as such.

Section Officer (E-1)
Public Health Engg. Department
Khyber Pakhtunkhwa

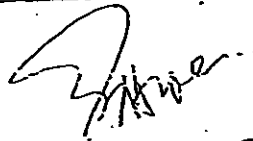
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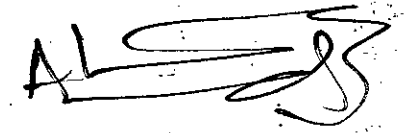
4.	Assistant Engineer/ Assistant Design Engineer/Sub Divisional Officer (BS-17).	Degree in B.E/B.Sc Engineering (Civil) from a recognized University.	21 to 32 years	<p>(a) Ten per cent by promotion on the basis of seniority-cum-fitness, from amongst the Sub-Engineers who possess a Degree in B.E/B.Sc Engineering (Civil) from a recognized University;</p> <p><u>Note:</u> The seniority for the purpose of promotion shall be reckoned from the date of acquiring degree of B.E/B.Sc Engineering (Civil) from a recognized University or date of appointment whichever is later.</p> <p>(b) twenty per cent by promotion on the basis of seniority-cum-fitness, from amongst the Sub-Engineers who hold a diploma and have passed Departmental Professional Examination with at least two years service as such; and</p> <p>(c) seventy per cent by direct recruitment.</p>
5.	Sub Engineer (BS-11).	Diploma of Associate Engineering (Civil) / Electrical / Mechanical from a recognized Technical Board.	18 to 30 years	<p>(a) Ten per cent by promotion from amongst the Draftsmen with seven years service as such, having Diploma in Civil/Electrical/Mechanical Technology from a recognized Board; and</p> <p>(b) ninety per cent by direct recruitment.</p>
11. <u>Ministerial Establishment:</u>				
6.	Budget and Accounts Officer/Administrative Officer (BS-17).			By promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents with five years service as such.
7.	Superintendent (BS-16).			<p>(a) Seventy per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Assistants with five years service as such; and</p> <p>(b) thirty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale stenographers with five years service as such.</p>

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Senior Scale Stenographers (BS-15).	(a) Second Class Bachelor's Degree or equivalent qualification from a recognized University; and (b) a speed of 100 words per minute in English shorthand and 40 words per minute in English typing.	18 to 30 years	By promotion, on the basis of seniority, fitness, from amongst the Stenographers BS-12 with five years service as such. Provided that if no suitable candidate is available for promotion, then by initial recruitment.
9. Junior Scale Stenographer (BS-12).	(a) Second Class Intermediate/ D.Com or equivalent qualification from a recognized Board; and (b) a speed of 50 words per minute in English shorthand and 35 words per minute in English typing.	18 to 30 years	By initial recruitment.


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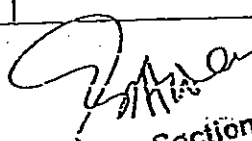
10.	Assistant/Head Clerk (BS-14).	Second Class Bachelor's Degree from a recognized University.	21 to 32 years	<p>(a) Twenty-five per cent by promotion on the basis of seniority-cum-fitness, from amongst the Accounts Clerks, having served for at least five years service as such;</p> <p>(b) Fifty per cent by promotion on the basis of seniority-cum-fitness, from amongst the Accounts Clerk other than (a) with five years service as such.</p> <p>Provided that if qualified persons are not available for promotion, against the quota at (a), then the vacancy shall be filled in by way prescribed at (b); and</p> <p>(c) Twenty-five per cent by initial recruitment.</p>
11.	Accounts Clerk (BS-11).			By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with five years service as such.
12.	Senior Clerk (BS-09).			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks with three years service as such.
13.	Junior Clerk (BS-07).	<p>(a) Second Division Intermediate or equivalent qualification from a recognized Board; and</p> <p>(b) a speed of 30 words per minute in English typewriting.</p>	18 to 28 years	<p>(a) Twenty per cent by promotion, from amongst the Dafitars, Record Lifters, Daffadar, Barkandaz, Naib Dafdar, and Chowkidars, who have passed Secondary School Examination and are under 45 years of age and have at least two years service as such; and</p> <p><u>Note:</u> For the purpose of promotion the department shall maintain a joint seniority list of Dafitars, Naib Qasids, Chowkidars, Record Lifter, Daffadar and Barkandaz based on the date of regular appointment to the post or that of acquiring the SSC whichever is later, provided that if two dates are the same the person older in age or having longer service, whichever is more beneficial to him, shall rank senior; and</p> <p>(b) eighty per cent by initial recruitment.</p>

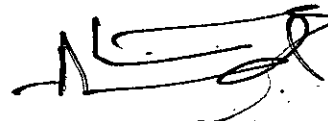
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 Khyber Pakhtunkhwa

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21	Naftari/Record Lifter/ Daffadar/Barkandaz (BS-02).	Preferably literate, - preference will be given to Ex-Service Man.	18 to 35 years	By promotion, from amongst the Naib Qasids/Chowkidars having Middle Standard qualification: Provided that if no suitable candidate is available for promotion, then by initial recruitment.
15.	Naib Qasid (BS-01).	Middle Standard qualification.	18 to 40 years	By initial recruitment.
16.	Driver (BS-04).	Possessing a valid LTV/ HTV Driving License with five years experience, having Middle Standard qualifications from a recognized Board.	18 to 45 years	By initial recruitment.
17.	Chowkidar (BS-01).	Literate.	18 to 45 years	By initial recruitment.
18.	Sweeper (BS-01).		18 to 45 years	By initial recruitment.
19.	Data Entry Operator / Computer Aided Design, Computer Operator (BS-11).	Second Class Intermediate Certificate or equivalent qualification from a recognized Board and one year Diploma in Information Technology or Computer Science from a recognized Board.	18 to 30 years	By initial recruitment.


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III. Drawing Branch Establishment:

20.	Chief Draftsman (BS-17).			By promotion, on the basis of seniority-cum-fitness, from amongst the Circle Head Drafts with five years service as such.
21.	Circle Head Draftsman (BS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst the Head Drafts Divisional Head Draftsman with five years service as such.
22.	Head Draftsman / Divisional Head Draftsman (BS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst the Draftsman with five years service as such.
23.	Draftsman (BS-11).	(a) Second Division Secondary School Certificate from a recognized Board; and (b) two years duration Certificate Course in Civil Draftsmanship from a recognized Board of Technical Education.	18 to 30 years	(a) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Tracers having Certificate of Civil Draftsman Course of two years duration from a recognized Board of Technical Education with three years service as such; (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Tracers who have qualified the prescribed Departmental Examination of Draftsman and having three years service as such; Provided that if no suitable candidates are available for promotion against the quota at then the vacancy shall be filled in by way prescribed at (b) and vice versa; and (c) fifty per cent by initial recruitment.

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24.	Tracer (BS-05).	(a) Second Class Secondary School Certificate from a recognized Board; and (b) Survey course of at least 6-9 months duration.	18 to 30 years	(a) Twenty-five by promotion, from amongst the Ferro-Printer/Ferro Khai Secondary School Certificate with two years service as such; and (b) seventy-five per cent by initial recruitment
25.	Ferro-Printer/Ferro Khalasi (BS-02).	Middle Standard Qualification.	18 to 30 years	By initial recruitment.

IV. Water Quality (WQ) Laboratory's Technical Staff:

26.	Water Scientist / Senior Research Officer (WQ) (BS-18).	Second Division M.Sc (Micro-biology or Chemistry) from a recognized University.		By promotion, on the basis of seniority-cum-fitness, from amongst the members holding the post of Research Officer (Water Quality) BS-17 with five years service.
27.	Research Officer (WQ) (BS-17).	Second Division M.Sc (Micro-biology or Chemistry), from a recognized University.	21 to 32 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from members of service holding the post of Assistant Research Officer (Water Quality) BS-16 with three years service as such; and (b) fifty per cent by initial recruitment; and
28.	Assistant Research Officer (WQ) (BS-16).	Second Division B.Sc (Microbiology or Chemistry) from a recognized University.	21 to 30 years	By initial recruitment.

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Laboratory Technician (BS-06)	Second Division Secondary School Certificate or equivalent qualification from a recognized Board and relevant Laboratory Technician Course from a recognized Technical Board/Institute.	18 to 40 years	By initial recruitment
30. Laboratory Attendant (BS-01)	Literate.	18 to 45 years	By initial recruitment.

V. Hydrogeology/Resistivity Survey Staff:

31. Research Officer/ Hydro-Geologist (BS-17).	Second Division M.Sc (Hydro-Geology) or B.Sc (Civil/Agriculture Engineering) with two years relevant experiences or Second Division M.Sc. (Water Resources/ Civil Engineering) from a recognized University.	21 to 32 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from all members of service holding the post of Assistant Research Officer (Resistivity) with three years service as such; and (b) fifty per cent by initial recruitment.
32. Assistant Research Officer (R/Survey) (BS-16).	Second Division M.Sc (Hydro-Geology) or B.Sc (Civil/Agriculture Engineering) or Second Division M.Sc. (Water Resources/ Civil Engineering) from a recognized University.	21 to 30 years	By initial recruitment.

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33. Technician (BS-06).	Second Class Secondary School Certificate or equivalent qualification from a recognized Board and relevant Technician Course from a recognized Technical Board/Institute.	18 to 30 years	By initial recruitment.
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VI. Community Development/Health Hygiene Promotion Staff:

34. Assistant Social Organizer (BS-16).	Second Class Master's Degree in Social Sciences from a recognized University.	21 to 30 years	By initial recruitment.
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VII. -EIA/Environment Section Staff:

35. Environmentalist (BS-17):	Second Class Master's Degree in Environmental Sciences/Environmental Engineering from a recognized University.	21 to 30 years	By initial recruitment or by deputation from Environmental Protection Agency Frontier Province.
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SECRETARY TO GOVERNMENT OF THE NORTH-WEST FRONTIER PROVINCE
PUBLIC HEALTH ENGINEERING DEPARTMENT.

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Section Officer (Estt)
Public Health Engg: Department
Dy. Secy Peshawar

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