


# FORM OF ORDER SHEET

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

**Appeal No. 1086/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	02/08/2024	<p>The appeal of Mr. Waseem Ullah resubmitted today by Mr. Qambar Iqbal Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 06.08.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p>  <p><b>REGISTRAR</b></p>

The appeal of Mr. Waseem Ullah received today i.e on 15.07.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.


- 1- Annexures C,D,E & F of the appeal are illegible be replaced by legible/better one.
- 2- Copy of seniority list issued on dated 28.09.2018 mentioned in the memo of appeal is not attached with the appeal.
- 3- Check list is not attached with the appeal.
- 4- Appeal has not been flagged/marked with annexures marks.
- 5- Index is not signed by the counsel.
- 6- Memorandum of appeal is not signed by the appellant.
- 7- Annexures of the appeal are unattested.
- 8- Copy of appointment order is not attached with the appeal be placed on file.
- 9- Three copies/sets of the appeal along annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 390 /Inst./2024/KPST,

Dt. 19/7 /2024.

*Objections removed and resubmitted  
on 01/08/2024*

Qamar Iqbal Adv  
High Court Peshawar.

  
19/7/24  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

**BEFORE THE HON'BLE SERVICE TRIBUNAL  
PESHAWAR**

In Re S.A No. 1086 /2024

Scanned  
KPST Peshawar

Waseem Ullah S/o Mohib Ullah Sweeper

**VERSUS**

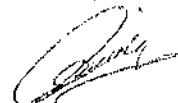
IGP Govt of KPK & others

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APPELLANT

Through

  
Qamar Iqbal  
Advocate, High Court  
Peshawar.

Dated:15/07/2024

①

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL

In Re S.A No. 1086 /2024

Petition No. 14245  
Date 15-7-2024

Waseem Ullah S/o Mohib Ullah Sweeper Civil Prison  
Mardan.

Appellant

***VERSUS***

1. The Inspector General of Prisons KPK Peshawar.
2. Superintendent Central Prison Mardan
3. Muhammad Rehman Junior Clerk Sub Jail Malakand
4. Zeeshan S/o Usman Zar Junior Clerk Sub Jail Khar Bajaur
5. Muslim Shah Junior Clerk Sub Jail Ghallania Mohmand
6. Muhammad Zahid Junior Clerk Internment Centre Khar Bajaur.
7. Said Anwar Shah Junior Clerk Inspectorate of Prisons
8. Saleem Khan Junior Clerk Central Prison Peshawar.

Respondents

**SERVICE APPEAL U/S-4 OF THE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL ACT 1974 AGAINST THE IMPUGNED**  
**ORDER VIDE DATED 01.04.2022 AND ORDER VIDE DATED**  
**17.05.2022 ISSUED BY THE COMPETENT AUTHORITY.**

Prayer:-

**ON ACCEPTANCE OF THIS INSTANT APPEAL THE**  
**IMPUGNED ORDER VIDE DATED 01.04.2022, 17.05.2022**  
**MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY**  
**KINDLY BE PROMOTED RETROSPECTIVELY I.E FROM**  
**THE DATE ON WHICH HIS JUNIOR COLLEAGUES HAVE**  
**BEEN PROMOTED TO THE POST OF JUNIOR CLERKS.**  
**ANY OTHER RELIEF DEEMED APPROPRIATE IN THE**  
**CIRCUMSTANCES OF THE CASE NOT SPECIFICALLY**  
**ASKED FOR, MAY ALSO BE GRANTED TO THE**  
**APPELLANT.**

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Respectfully Sheweth,

FACTS:-

1. That the appellant being illegible in all respect was appointed as sweeper BPS-4 in the respondent department.
2. That the appellant is qualified upto F.A and since appointment the appellant is performing his duty regularly and efficiently. (Copy of educational document is attached as annexure "A").
3. That as per seniority list issued on dated 24.03.2022 the name of the appellant is at S.No.09 however official junior to the appellant namely (1) Muhammad Rehman (2) Zeeshan (3) Muslim Shah (4) Muhammad Zahid (5) Said Anwar Shah (6) Saleem Khan (7) Atteq Ullah (8) Muhammad Khalil and (9) Zeeshan Khan who are at S.NO.10, 11, 12, 31, 33, 36, 39, 40, 41 & 42 respectively. (Copy of seniority list is attached as annexure "B").
4. That the respondent No.1 promoted the respondent No.3 to 8 from the post of sweeper to the post of Junior Clerk PBS-11 while the appellant has been differed. (Copy of promotion order is attached as annexure "C").
5. That the appellant then approached to the competent authority for the redressal of grievances but in vain, however the respondent No.1 handed over an official order vide dated 01.04.2022 and informed the appellant that every official should undergo the typing test for the purpose of promotion. (Copy of official letter is attached as annexure "D").
6. That as per service rules formulated for the purpose of promotion to the post of Junior Clerk from various incumbents of clause IV there is no condition of typing test. (Copy of service rule dated 15.04.2022 is attached as annexure "E").
7. That previously the respondent No.1 promoted some of the officials from the post of PBS-IV to PBS-11 without conducting typing test. (Copy of order dated 08.11.2017 is attached as annexure "F").

(11)

8. That the appellant being aggrieved from the action and inaction of the respondents has made context for redressal of his grievance but in vain also filed departmental appeal however no action has been intimated within the statutory period. (Copy of departmental appeal is attached as annexure "G")

9. That being highly aggrieved from the inaction of the respondent department with regard to the departmental appeal having no other remedy except to file the service appeal in the Hon'ble Tribunal on the following grounds inter alia:-

GROUNDS:-

- A. That the impugned orders vide dated 14.04.2022 and order vide dated 17.05.2022 are against the law, rules, facts and circumstances of the case, hence liable to be set aside.
- B. That the acts of the respondents are against the service rules and orders of the Hon'ble Supreme Court citation 2013 PLC(SC) 987.
- C. That the appellant has been appointed in the year 2017 therefore the appellant is entitle to be treated retrospectively because previously some officials were promoted without qualifying typing test.
- D. That non promoting the appellant is gross violation of S.No.37 column No.4 of service rules issued on dated 15.04.2022.
- E. That the appellant has not been promoted by the respondent due to malafide.
- F. That the appellant has not been treated equally according to the constitution of Islamic Republic to Pakistan 1973.
- G. That the appellant has badly suffered due to illegal promotion of the respondent No.3 to 8.

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H. That a Junior Colleagues of the appellant have been promoted which is clear violation of the rights of the appellant.

I. That any other ground which is not specifically mentioned will be taken with the prior permission of this Hon'ble Court.


*It is therefore, most humbly prayed that on acceptance of this ~~instant~~ appeal the impugned order vide dated 01.04.2022, 17.05.2022 may please be set aside and the appellant may kindly be promoted retrospectively i.e from the date on which his junior colleagues have been promoted to the post of junior clerks..*

*Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.*

Dated: 15/07/2024

APPELLANT

Through

  
Qamar Iqbal  
Advocate, High Court  
Peshawar.

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner; upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.

  
Advocate.

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BEFORE THE HON'BLE SERVICE TRIBUNAL  
PESHAWAR

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

Waseem Ullah S/o Mohib Ullah Sweeper

*VERSUS*

IGP Govt of KPK & others

AFFIDAVIT

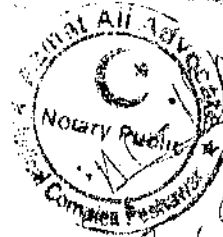
I, Waseem Ullah S/o Mohib Ullah Sweeper Civil Prison Mardan R/o Nehar Road Par Hoti Yakqoob Khan Mardan, do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

*Waseem Ullah*  
DEPONENT

*Identified by:*

*Qamar Iqbal*  
Qamar Iqbal  
Advocate High Court  
Peshawar.

ATTESTED





⑥

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**PESHAWAR**

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

Waseem Ullah S/o Mohib Ullah Sweeper

*VERSUS*

IGP Govt of KPK & others

**ADDRESSES OF PARTIES**

***PETITIONER.***

Waseem Ullah S/o Mohib Ullah Sweeper Civil Prison  
Mardan.

**ADDRESSES OF RESPONDENTS**

1. The Inspector General of Prisons KPK Peshawar.
2. Superintendent Central Prison Mardan
3. Muhammad Rehman Junior Clerk Sub Jail Malakand
4. Zeeshan S/o Usman Zar Junior Clerk Sub Jail Khar  
Bajaur
5. Muslim Shah Junior Clerk Sub Jail Ghallania Mohmand
6. Muhammad Zahid Junior Clerk Internment Centre Khar  
Bajaur.
7. Said Anwar Shah Junior Clerk Inspectorate of Prisons
8. Saleem Khan Junior Clerk Central Prison Peshawar.

*[Signature]*  
**APPELLANT**

Through

*[Signature]*  
**Qamar Iqbal**  
Advocate, High Court  
Peshawar.

Dated: 15/07/2024

(7)

Ammittee "A"



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION  
MARDAN N.W.F.P PAKISTAN

S. No. MB 096987

Roll No 4807  
Reg No: 108-B/HM-2005

PROVISIONAL AND DETAILED MARKS CERTIFICATE  
INTERMEDIATE (SUPPLY) EXAMINATION - 2007  
HUMANITIES ( Part-II )

WASEEM ULLAH Son/Daughter of MOHIB ULLAH  
of Institution/District MARDAN

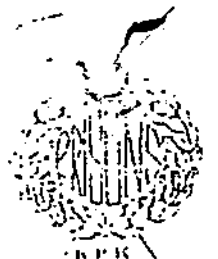
has secured the marks shown against each subject in the Higher Secondary School Examination held in the month of NOVEMBER/DECEMBER as PRIVATE Candidate.

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	33	-	42	--	75	Seventy-Five
Urdu	200	40	--	40	--	80	Eighty
Islamic Education	50	27	--	--	--	27	Twenty-Seven
Pakistan Studies	50	--	--	33	--	33	Thirty-Three
Civics	200	45	--	63	--	108	One Hundred Eight
Islamic Studies	200	62	--	61	--	123	One Hundred Twenty-Three
Health & Physical Education	100	3	14	41	24	110	One Hundred Ten Only
<b>Total : 1100</b>						562-C	Five Hundred Sixty-Two Only
Remarks :							

Prepared by :  
Checked by :  
Date of Declaration of Result 21-JAN-08  
Date of Issue 21-JAN-08

Note: Errors/Omissions are excepted. Any mistake in above particulars must be intimated within 30 days after declaration of result.

*[Signature]*  
Controller of Examinations  
BISE, Mardan



*[Signature]*  
 Director General  
 Prisons Department  
 Khyber Pakhtunkhwa

INSPECTOR GENERAL OF PRISONS  
 KHYBER PAKHTUNKHWA PESHAWAR

NO. 6/24-J-22 11458

DATED 24-03-2022

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**NOTIFICATION**

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, revised final Seniority list matriculate Class-IV employee in Prisons Department i.e. Restorer, Naib Qasid, Water Carrier/Behishti, Photostate Machine Operators, Tubewell Operators, Plumbers, Engine Man, Dhobis, Chowkidar, Mali, Pipe Fitter & Sweepers including holding of other equivalent posts as it stood on 01-01-2022 is notified/circulated for general information of the officials concerned:-

S #	NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT.	DATE OF FIRST ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION			PRESENT APPOINTMENT with place of posting	Remarks.
				DATE	BPS	METHOD OF APPOINTME NT		
1.	Irum bhatti D/O Saleem Bhatti (SSC)	30-01-1985 (Kohat)	01-01-2010	01-01-2010	03	Direct	Sweeper at DJ Kohat	inter-se-seniority of the officials are maintained according to the date of regular appointment as well as from the date of acquiring SSC. The dates of regular appointment in respect of officials at S.No.60, 61,62, 63, 64, 66, 67, 74, 75 & 121 are 31-07-2012, 18-04-2013, 04-09-2014, 24-08-2015, 04-08-2017, 04-04-2016, 18-12-2017, 28-01-2013, 04-08-2017 & 01-06-2003 however, SSC acquired by them in the year 2019, 2020 & 2021, therefore, as per service rules their seniority determine from the
2.	Razimand Shah S/O Bakhtmin Shah (Matric)	01-01-1994 (Buner)	10-03-2015	10-03-2015	03	Direct	Cook at Distt; Jail Buner.	
3.	Ahmad Khan (Matric).	07-10-1971(Bannu)	01-6-2015	01-6-2015	03	Direct	Sweeper, C.P. Bannu.	
4.	Zeeshan (F.A).	05-4-1982(Nowshera)	19-1-2016	19-1-2016	03	Direct	Sweeper, Sub Jail Nowshera.	
5.	Mohsin Khan S/O Abdul Khitab (F.A)	01-01-1996 (Bannu)	02-02-2015	02-02-2015	03	Direct	Waiter at B.I Bannu.	
6.	Muhammad Farooq(B.A).	03-3-1995(Mardan).	04-7-2016	04-7-2016	03	Direct	Mali, CP Mardan.	
7.	Simon Javed (F.A)	07-10-1994(Peshawar).	17-10-2016	17-10-2016	03	Direct	Sweeper,CP Peshawar.	
8.	Nazar Sheeraz(Matric)	03-3-1987(Mansehra).	25-10-2016	25-10-2016	03	Direct	Sweeper, C.P. Haripur.	
9.	Wasim Ullah (FA).	15-03-1988 (Mardan).	05-08-2017	05-08-2017	03	Direct	Sweeper CP Mardan.	
10.	Muhammad Rahman (FA).	02-05-1994 (Mardan).	05-08-2017	05-08-2017	03	Direct	Sweeper CP Mardan.	
11.	Zeeshan (BA).	14-02-1996 (Mardan).	05-08-2017	05-08-2017	03	Direct	Sweeper CP Mardan.	
12.	Muslim Shah (FA/DIT).	18-02-1993(Mardan).	07-08-2017	07-08-2017	03	Direct	Mali CP Mardan.	
13.	Tahir Muhammad (BA).	03-01-1980 (Mardan).	19-08-2017	19-08-2017	03	Direct	Cook at CP Mardan.	
14.	Attaullah S/O Jamshed (F.A)	01-04-1991 (Mardan)	19-08-2017	19-08-2017	03	Direct	Cook at CP Mardan.	
15.	Abid Ali S/O Sar Zamin	04-04-1990(Mardan).	24-08-2017	24-08-2017	03	Direct	Cook at CP Mardan.	
16.	Arif Khan (Matric)	10-01-1997 (Mardan).	24-08-2017	24-08-2017	03	Direct	Sweeper CP Mardan	
17.	Khalid Khan S/O Mr Kamran (B.A)	10-01-1987 (Mardan)	25-08-2017	25-08-2017	03	Direct	Cook at CP Mardan	
18.	Sartaj Khan S/O Sarwar Khan (B.A)	19-07-1977 (Mardan)	26-08-2017	26-08-2017	03	Direct	Cook at CP Mardan	
19.	Sher Zaman S/O Abdur Rehman (M.A)	03-11-1985 (Mardan)	25-08-2017	26-08-2017	03	Direct	Cook at CP Mardan	
20.	Gul Muhammad Said(FA).	05-01-1986(Mardan).	26-08-2017	26-08-2017	03	Direct	Sweeper CP Mardan.	
21.	Irfanullah (D Com).	22-01-1993(Mardan).	26-8-2017	26-8-2017	03	Direct	Sweeper CP Mardan.	

22	Sa Khan S/O Amir Zada (F.A)	01-01-1994 (Mardan)	26-08-2017	26-08-2017	03	Direct	Cook at CP Mardan
23	Abdul Samad (Matric)	17-03-1994(Mardan)	26-08-2017	26-08-2017	03	Direct	Mali CP Mardan
24	Adnan Khan (Matric)	24-02-1998 (Mardan)	26-08-2017	26-08-2017	03	Direct	Sweeper CP Mardan
25	Sifat Ullah S/O Momin Khan (F.A)	03-03-1998 (Mardan)	26-08-2018	26-08-2018	03	Direct	Cook at CP Mardan
26	Farman Abbas(FA)	04-5-1999(Mardan)	26-08-2017	26-08-2017	03	Direct	Sweeper CP Mardan
27	Mr. Akmal Khan S/O Kishwar Khan (SSC)	20-03-1990(Mardan)	28-08-2017	28-08-2017	03	Direct	Cook CP Mardan.
28	Jehad Ali (Matric)	05-01-1993 (Mardan)	28-08-2017	28-08-2017	03	Direct	Mali CP Mardan
29	Shah Malik (Matric)	01-08-1995(Mardan)	28-08-2017	28-08-2017	03	Direct	Sweeper CP Mardan
30	Salman Khan S/O Shah Jehan(SSC)	01-01-1998(Mardan)	13-10-2017	13-10-2017	03	Direct	Cook at CP Mardan.
31	Muhammad Zahid (MA)	02-02-1978(Mardan)	01-11-2017	01-11-2017	03	Direct	Water Carrier CP Mardan
32	Javid Aslam (Matric)	20-03-1974(Karak)	08-12-2017	08-12-2017	03	Direct	Mali, CP Karak.
33	Muhammad Sajid Khan(Matric)	10-09-1995 (Bannu)	11-12-2017	11-12-2017	03	Direct	Sweeper, CP Bannu
34	Majid Naseem (Matric)	16-06-1985(Peshawar)	14-12-2017	14-12-2017	03	Direct	Pipe Fitter CP Peshawar.
35	Barkat Ullah (Matric)	24-05-1993(Bannu)	21-12-2017	21-12-2017	03	Direct	Sweeper, B.I. Bannu.
36	Syed Anwar Shah(F.A)	03-05-1982(Peshawar)	22-12-2017	22-12-2017	03	Direct	Restofer, Inspectorate of Prisons Peshawar
37	Muhammad Adnan (Matric)	03-04-1988(Peshawar)	26-01-2018	26-01-2018	03	Direct	Naib Qasid, Inspectorate of Prisons Peshawar.
38	Kiram Shah (Matric)	18-06-1977(Charsadda)	14-02-2018	14-02-2018	03	Direct	Water Carrier, Inspectorate of Prisons Peshawar
39	Saleem Khan (FA)	14-04-1987(Peshawar)	22-02-2018	22-02-2018	03	Direct	Sweeper C.P Peshawar.
40	Atiq Ullah S/O Naseer Shah(SSC)	15-03-2000(Lakki Marwat)	01-07-2018	01-07-2018	03	Direct	Cook DJ Lakki Marwat.
41	Muhammad Khalil S/O Muhammad Zameer (M.A)	23-05-1989 (Mardan)	17-08-2018	17-08-2018	04	Direct	Photo Stat Machine Operator at CP Mardan
42	Zeeshan Khan S/O Kapoor Khan (M.A)	03-04-1995 (Mardan)	18-08-2018	18-08-2018	04	Direct	Tube-Well Operator at CP Mardan
43	Muhammad Junaid S/O Hakim Khan (Matric)	30-03-1998 (Mardan)	20-08-2018	20-08-2018	04	Direct	Tube well Operator at CP Mardan
44	Shah Hussain S/O Mahyudin (Matric)	02-02-1981 (Mardan)	24-08-2018	24-08-2018	04	Direct	Tube well Operator at CP Mardan
45	Muhammad Adil S/O Habib ur Rehman (F.A)	10-09-1990 (Mardan)	24-08-2018	24-08-2018	04	Direct	Photo Stat Machine Operator at CP Mardan
46	M. Shahbaz Khan S/O Bakht Zamin (SSC)	20-03-1999(Mardan)	24-08-2018	24-08-2018	04	Direct	Tube well operator at CP Mardan.
47	Yasir Ali S/O Muzamil Khan (F.A)	12-05-1994 (Mardan)	31-08-2018	31-08-2018	03	Direct	Attendant at CP Mardan
48	Asfandiyar S/O Sahibzada (B.A)	04-04-1987 (Mardan)	01-09-2018	01-09-2018	03	Direct	Dhobi at CP Mardan
49	Abdullah S/O Muhammad Inam (F.A)	18-02-1990 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan
50	Yarq Iqbal S/O Khalil ur Rehman (F.A)	10-06-1992 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan
51	Haveed Khan S/O Fazal Khan (F.A)	12-02-1993 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan
52	Amir Khan S/O Habib Ur Rehman (F.A)	02-04-1993 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan

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Date acquiring SSC and not from the date of regular appointment.

	Nasir Ahmad S/O Jehangir Khan (F.A)	15-06-1995 (Mardan)	01-09-2016	01-09-2018	03	Direct	Baker at CP Mardan
	Muhammad Basit S/O Fazal ur Rehman (F.A)	15-03-1998 (Mardan)	01-09-2016	01-09-2018	03	Direct	Attendant at CP Mardan
55	Aqib Ali S/O Amin Gul (M com)	06-06-1996 (Mardan)	01-09-2018	01-09-2018	03	Direct	Plumber at CP Mardan
56	Noelain D/O Muhammad Saeed (F.A)	02-02-2000 (Mardan)	01-09-2018	01-09-2018	03	Direct	F.M Attendant at CP Mardan
57	Shafiq ur Rehman S/O Shams ur Rehman (Matric)	14-01-1989 (Chitral Lower)	17-12-2018	17-12-2018	03	Direct	Plumber at DJ Chitral
58	Yasir Kamal S/O M. Kamal Khan (SSC)	18-02-1991 (Lakki Marwat)	20-12-2018	20-12-2018	03	Direct	Cook at DJ Lakki Marwat
	Muhammad Usman (M.A Islamiyat)	23-01-1987 (Lakki Marwat)	28-12-2018	28-12-2018	03	Direct	Sweeper DJ Lakki Marwat
60	Akbar Shahzada (Matric in 2019)	14-01-1986 (Karak)	31-07-2012	31-07-2012	03	Direct	Sweeper CP Karak
61	Rahmat Ullah S/O Mohd. Amir (Matric in 2019)	10-06-1980 (Bannu)	18-04-2013	18-04-2013	03	Direct	Sweeper at B.I Bannu
62	Ishaq Khan (Matric in 2019)	09-03-1987 (Nowshera)	04-09-2014	04-09-2014	03	Direct	Naib Qasid Inspectorate of Prisons Peshawar
63	Khayat Mohd S/O Gul Pio (Matric in 2019)	20-03-1983 (Karak)	24-08-2015	24-08-2015	03	Direct	Sweeper at CP Bannu
64	Fazal Maula S/O Abdul Wadod (Matric in 2019 & F.A in 2021)	01-01-1993 (Mardan)	04-08-2017	04-08-2017	03	Direct	Sweeper at CP Mardan
65	M. Adeel S/O Malik Jehanzeb (FA)	24-03-1990 (D.I Khan)	20-03-2019	20-03-2019	03	Direct	Plumber at CP D.I Khan
66	Dolat Khan S/O Karim Baz (Matric in 2020)	01-07-1983 (Mardan)	04-04-2016	04-04-2016	03	Direct	Sweeper at CP Mardan
67	Afrasiyab S/O Zarjan (Matric in 2020)	20-05-1991 (Karak)	18-12-2017	18-12-2017	03	Direct	Sweeper at CP Karak
68	Gul Zaman S/O Abdul Sattar (HSSC)	18-02-1988 (D.I Khan)	13-03-2020	13-03-2020	03	Direct	Dhobi at CP D.I Khan
69	Zabih Ullah S/O Gul mat (HSSC & DIT)	01-01-1994 (D.I Khan)	13-03-2020	13-03-2020	03	Direct	Sweeper at CP D.I Khan
70	Mohsin Ali S/O Fida Hussain (SSC)	27-11-1994 (D.I Khan)	13-03-2020	13-03-2020	03	Direct	Barber at CP D.I Khan
71	Shan Iqbal S/O Mohd. Iqbal (SSC)	05-05-1993 (D.I Khan)	01-04-2020	01-04-2020	03	Direct	Baker at CP D.I Khan
72	Afsar Ullah S/O Bakht Ali Khan (FA)	25-03-1989 (Bannu)	07-05-2020	07-05-2020	03	Direct	Baker at C.P Bannu
73	Feroz Ali S/O Mehmod Ali (B.A & DIT)	12-03-1994 (Bannu)	07-05-2020	07-05-2020	03	Direct	Dhobi at CP Bannu
74	Shah Faisal S/O Parvaish Khan (SSC)	03-01-1984 (Swat)	28-01-2013	28-01-2013	03	Direct	Sweeper at District Jail Swat
75	Raaz Muhammad S/O Zar Muhammad (SSC)	01-01-1983 (Mardan)	04-08-2017	04-08-2017	03	Direct	Sweeper at C.P Mardan
76	Shadman Ullah S/O Gul Raees Khan (FA)	01-01-2000 (Bannu)	07-05-2020	07-05-2020	03	Direct	Dhobi at C.P Bannu
77	Azeem Khan S/O Abdul Hameed (FSC)	20-08-1991. (Abbottabad)	03-08-2020	03-08-2020	05	Direct	Photostat machine operator at DJ Abbottabad.
78	Amil Khan S/O M. Ilyas (Matric)	17-03-1982 (Abbottabad)	21-10-2020	21-10-2020	05	Direct	Tubewell Operator at DJ Atd
79	Muhammad Saqib S/O Muhd. Nawaz (M.A Political Science & DAE)	20-01-1988 (D.I Khan)	05-11-2020	05-11-2020	05	Direct	Tube Well Operator at CP D.I Khan.
80	Zain Shafiq S/O Shafiq Masih (F.A)	18-07-1987 (Peshawar)	09-11-2020	09-11-2020	03	Direct	Sweeper at C.P Peshawar
81	Jabir Ali (F.A)	02-07-1997 (Peshawar)	11-11-2020	11-11-2020	05	Direct	Photostat machine operator Inspectorate of Prisons
82	Saad Ali S/O Pasham Ali (F.Sc)	01-04-1996 (Kohat)	09-12-2020	09-12-2020	03	Direct	Baker at DJ Kohat.
83	Huzaiifa Khan S/O Zubair Khan (B.A)	10-09-1999 (Kohat)	09-12-2020	09-12-2020	03	Direct	Executioner at DJ Kohat
84	Mohsin Ali Shah S/O Amjid Hussain Shah (DAE)	05-11-1993 (Haripur)	05-01-2021	05-01-2021	03	Direct	Baker at C.P Haripur
85	Amir Shahzad S/O Mohd Tariq (SSC)	03-03-1995 (Haripur)	05-01-2021	05-01-2021	03	Direct	Dhobi at C.P Haripur
86	Sagheer Nazcer S/O Muhd Nazeer (SSC)	15-04-1996 (Haripur)	05-01-2021	05-01-2021	03	Direct	Dhobi at C.P Haripur
87	Zahid Zaman S/O Wazir Gul (Matric)	15-04-1982 (Nowshera)	07-01-2021	07-01-2021	03	Direct	Baker at SJ Nowshera

*(Signature)*

27	Zarak Khan S/O Farooq Khan (Metric)	26-07-1992 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
128	Rafaqat Ullah S/O Ikram Ullah (Metric)	01-04-1993 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
129	Muzad S/O Shaheen Iqbal (Metric)	18-12-1997 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
130	Muht. Ashfaq S/O Zakir Ullah (Metric)	20-08-2001 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
131	Shahzad Khan S/O Liaqat Ali Khan (FSc)	14-07-2001 (Peshawar)	20-12-2021	20-12-2021	03	Direct	Naib Qasid at RPO Peshawar

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

ENDST: NO. 11457-500

Copy of the above is forwarded to:  
D.I.G/DDO Regional Prisons Office Peshawar  
All Superintendents of Jails, (except NMD's Jails).  
Office Accountant Inspectorate General of Prisons Peshawar.

For information of the officials concerned. Revised Seniority list issued due to left over of officials at Seniority No. 46, 74, 75 & 89 please.

DEPUTY DIRECTOR (E)  
INSPECTORATE GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR

Advocate General  
Peshawar

Annexure "C"

GAMMAL HOBBAL  
Advocate High Court



INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. 15682-1-58

Dated 17-05-2022

REGISTERED PARCEL/IMMEDIATE

To, The Superintendent,  
Central Prison Mardan

Subject: PASSING THE MANDATORY TYPING TEST BY CLASS-IV ESTABLISHMENT  
AND SUBMISSION OF THEIR BIO DATA/PERS FOR PLACING BEFORE THE  
DEPARTMENTAL PROMOTION COMMITTEE

Memo: I am directed to refer to your letter No. 854/WE dated 19-04-2022 on the subject and to return herewith the below noted documents as noted against the names of the following Class-IV Employees received with your letter under reference:

SN	Name of official with designation	Name of documents
1	Muhammad Farooq, Mal	Service Book (in-original), SSC (in-original)
2	Muhammad Rahman, Sweeper	
3	Zeeshan S/O Usman Zar, Sweeper	-do-
4	Musim Shah, Sweeper	-do-
5	Muhammad Zahid, Water Carrier	-do-
6	Muhd; Khalil, Photostat Machine Operator	-do-
7	Zeeshan S/O Kapoor Khan, Tube Well Operator	-do-
8	Muhd; Adil, Photostat Machine Operator	Service Book (in-original), SSC (in-original), attested photocopy of SSC and PERs for the period from 24-08-2018 to 31-12-2021 (in-original)
9	Asfandyar, Dhobi	Service Book (in-original), SSC (in-original), attested photocopy of SSC and PERs for the period from 01-09-2018 to 31-12-2021 (in-original)
10	Aamir Khan, Attendant	Service Book (in-original), SSC (in-original), attested photocopy of SSC and PERs for the period from 01-09-2018 to 31-12-2021 (in-original)
11	Naseer Ahmad, Baker	Service Book (in-original), SSC (in-original), attested photocopy of SSC and PERs for the period from 01-09-2018 to 31-12-2021 (in-original)
12	Muhammad Basil, Attendant	Service Book (in-original), SSC (in-original), attested photocopy of SSC and PERs for the period from 01-09-2018 to 31-12-2021 (in-original)

I am further directed to state that original PER's of the officials from Serial No. 08 to 12 may be kept in your secret office record.

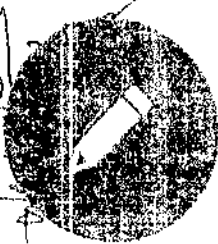
Please acknowledge the receipt.

DSE / OS  
15/05/2022

Sybil  
15.05.2022

*[Signature]*

ASSISTANT DIRECTOR (E)  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR





*[Signature]*  
Secretary  
Khyber Pakhtunkhwa

INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334,  
9210406

☎ 091-9213445

No. *[Handwritten]*

Dated *[Handwritten]*

**ORDER**

On the recommendation of Departmental Promotion Committee in its meeting held on 16-05-2022, the undersigned being Competent Authority is pleased to promote the following Class-IV employees to the post of Junior Clerk (BPS-11) on regular basis with immediate effect against the 75% quota

Sl#	NAME OF EMPLOYEES	CLASS-IV	NAME OF JAIL/OFFICE WHERE PRESENTLY POSTED
1	Zeeshan S/O Rahmat Lal		Sweeper at Sub Jail Nowshera
2	Mohsin Khan S/O Abdul Khilab		Waiter at Borstal Institute Bannu
3	Muhammad Farooq		Mali at Central Prison Mardan
4	Muhammad Rahman		Sweeper at Central Prison Mardan
5	Zeeshan S/O Usman Zar		Sweeper at Central Prison Mardan
6	Muslim Shah		Sweeper at Central Prison Mardan
7	Muhammad Zahid		Water Carrier at Central Prison Mardan
8	Syed Anwar Shah		Restorer at Inspectorate of Prisons Peshawar
9	Saloom Khan		Sweeper at Central Prison Peshawar
10	Atiq Ullah S/O Naseer Shah		Cook at District Jail Lakkhi Marwat
11	Muhammad Khalil		Photostat Machine Operator at Central Prison Mardan
12	Zeeshan Khan S/O Kapoor Khan		Tube-Well Operator at Central Prison Mardan

2 They will be on probation for a period of one year in terms of Section 6(2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and Rule-15 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989

3 Consequent upon their promotion, the following postings/transfers are hereby ordered in the public interest with immediate effect

Sl#	Name of officials.	From	To
1	Zeeshan S/O Rahmat Lal	Sub Jail Nowshera as Sweeper	Internment Centre Kohat as Junior Clerk (BPS-11) against the vacant post
2	Mohsin Khan S/O Abdul Khilab	BI Bannu as Waiter	Sub Jail Sadda (Korram) as Junior Clerk (BPS-11) against the vacant post
3	Muhammad Farooq	Central Prison Mardan as Mali	Sub Jail Beshum as Junior Clerk (BPS-11) against the vacant post
4	Muhammad Rahman	Central Prison Mardan as Sweeper	Sub Jail Malakand as Junior Clerk (BPS-11) against the vacant post
5	Zeeshan S/O Usman Zar	Central Prison Mardan as Sweeper	Sub Jail Khar Bajaur as Junior Clerk (BPS-11) against the vacant post
6	Muslim Shah	Central Prison Mardan as Sweeper	Sub Jail Chellanar (Mehmand) as Junior Clerk (BPS-11) against the vacant post
7	Muhammad Zahid	Central Prison Mardan as Water Carrier	Internment Centre Khar Bajaur as Junior Clerk (BPS-11) vide No 15
8	Syed Anwar Shah	Inspectorate of Prisons Peshawar as Restorer	Inspectorate of Prisons as Junior Clerk (BPS-11) against the vacant post
9	Saloom Khan	Central Prison Peshawar as Sweeper	Central Prison Peshawar as Junior Clerk (BPS-11) against the vacant post
10	Atiq Ullah S/O Naseer Shah	District Jail Lakkhi Marwat as Cook	Central Prison Bannu as Junior Clerk (BPS-11) against the vacant post
11	Muhammad Khalil	Central Prison Mardan as Photostat Machine Operator	District Jail Swat as Junior Clerk (BPS-11) against the vacant post.
12	Zeeshan Khan S/O Kapoor Khan	Central Prison Mardan as Tube-Well Operator	Sub Jail Jamrud (Khyber) as Junior Clerk (BPS-11) against the vacant post
13	Mst Laiba Zafar Junior Clerk (BPS-11)	Inspectorate of Prisons Peshawar	District Jail Manserwa against the vacant post
14	Shahbaz Khalid Junior Clerk (BPS-11)	Inspectorate of Prisons Peshawar	Central Prison Mardan against the vacant post

C/O-P-02.





QAMAR  
Advocate  
Peshawar

Office of the  
SUPERINTENDENT  
CENTRAL PRISON MARDAN  
Phone/Fax: 0937-843114  
Email: [mardanjail@gmail.com](mailto:mardanjail@gmail.com)

No. 1862/WE Dated: 1/4/2022

To,

The Inspector General of Prisons,  
Khyber Pakhtunkhwa Peshawar.

Subject: TYPING TEST OF CLASS-IV ESTABLISHMENT FOR THE POST OF  
JUNIOR CLERK (SPS-11) UNDER 25% QUOTA.

R/Sir,

Reference your office memo No. 11955-78 dated 30-03-2022 on the  
subject noted above.

It is submitted that all the candidates/Class-IV employees of this jail as  
mentioned in your above referred letter has been informed in written through notice  
(copy enclosed) regarding typing test which will be held in your good office on  
05-04-2022 at 11:00 AM and also written consent/acknowledgement has been  
obtained from them (except Sartaj Khan S/o Amir zada, as he is not willing for  
the test), which are enclosed herewith for your office record please

  
SUPERINTENDENT  
CENTRAL PRISON MARDAN

GOVERNMENT OF KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

*Peshawar, dated the 15<sup>th</sup> April, 2022*

No. SO(P&R)/1-33/2021. In exercise of the powers conferred by sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1939, and in supersession of all previous notifications issued in this regard, the Home & Tribal Affairs Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions, applicable to post, born on the strength of the Inspectorate of Prisons Khyber Pakhtunkhwa, as specified in column No.2 of the attached appendix.

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME AND TRIBAL AFFAIRS DEPARTMENT

Endst No. and Date even: Copy forwarded to:-

- 1- The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Peshawar.
- 2- The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
- 3- The Secretary to Government of Khyber Pakhtunkhwa, Law & Parliamentary Affairs Department Peshawar.
- 4- The Secretary to Government of Khyber Pakhtunkhwa, Health Department, Peshawar.
- 5- The Secretary to Government of Khyber Pakhtunkhwa, P & D Department Peshawar.
- 6- The Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar.
- 7- The Manager, Government Printing Press Peshawar for publication in the Government Gazette. He is further requested to send ten (10) copies of the said Gazette Notification to the Law Department as well as Home and Prisons Departments for record.
- 8- PS. to Home Secretary Khyber Pakhtunkhwa

DEPUTY SECRETARY (P&R)

Annexure "E"

37

Junior Clerk (BPS-11)

(a) FA/F.Sc with Matriculation or its equivalent qualification from a recognized Board; and

(b) a speed of thirty (30) words per minute in typing in English on computer.

(a) Twenty-five percent - by promotion, on the basis of seniority cum ~~marks~~, from amongst the holders of the posts of Restorer, Nait Qasids, Bahishis/Water Carriers, Photostate Machine Operators, Tubewell Operators, Plumbers, Mali, Engine Men, Dhobis, Chowkidars, Pipe Fitters, Sweepers, including holders of other equivalent posts in the Department, with two years service as such, having qualification as specified in column No.3:

Provided that if no suitable official is available for promotion then by initial recruitment;

(b) twenty-five percent by initial recruitment from amongst Warders, who have at least five years service and possess minimum qualification prescribed for initial recruitment.

Provided that :-

(i) if two or more officials have acquired the F.A/F.Sc qualification 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

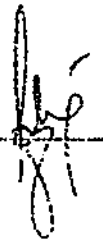
(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification, shall be promoted in preference to the senior official or officials.

Provided further that the condition F.A/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a), shall not apply till the expiration of a period as specified in the second proviso in column No.5. against Serial No 4 of the Establishment Department's Amending Notification No. SO(E&D)/1-35/2014, dated 18-07-2019, to the existing matriculate incumbents of the posts of Restorer, Nait Qasid, Bahishi / Water Carrier, Photostate Machine Operator, Tubewell Operator, Plumber, Mali, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper, including holders of other equivalent posts, for promotion to the post of Junior Clerk.

Note: For the purpose of promotion, there shall be maintained a joint seniority list of Restorer, Nait Qasid, Bahishi/Water Carrier, Photostate Machine Operator, Tubewell Operator, Plumber, Mali, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper etc; with reference to the dates of their acquiring the F.A /F.Sc or its equivalent qualification from a recognized Board; and

(c) Fifty percent by initial recruitment.

QAN  
ALL

APR 29 9:18 AM

INSPECTOR GENERAL OF PRISONS  
HYBER PAKHTUNKHWA PESHAWAR

No. Estab/Work/Organs/ 26871 / 1  
Dated 08-11-2017 / 1

ORDER

As recommended by the Departmental Selection/Promotion Committee No.2 in its meeting held on 07-11-2017 and approved by the competent authority, following members of Class IV ~~present~~ in the Department are hereby promoted in 33% quota to the post of Junior Clerk on the basis of merit affected in regular basis:-

S.NO.	NAME OF OFFICIAL
1	Muhammad Yousaf Sweeper CP Haripur
2	Mr Rooh-ul-Amin Restorer Inspectorate of Prisons
3	Mr Aurang Zeb Khan Sweeper CP Peshawar
4	Muhammad Saif q Sweeper CP Peshawar
5	Mr Gul Shad Ali P. S. F. CP Peshawar
6	Mr Daud Nisar Sweeper CP Bannu
7	Mr Yousaf Khan Sweeper Sub Jail Dir Upper
8	Muhammad Imtiaz Khan Sweeper CP/BI Bannu
9	Mr Gul Dan Khan Sweeper CP Bannu
10	Mr Sikandar Haya Ma. Dist. Jail Karak
11	Muhammad Bashir Sweeper Dist. Jail Karak
12	Muhammad Ayub Kh. in Sweeper CP Peshawar
13	Mr Naseem Khan Water Carrier Inspectorate of Prisons
14	Mr Saad Usman Khan Sweeper CP/BI Bannu
15	Muhammad Arif Habib Qasid Inspectorate of Prisons
16	Mr Mansoor Ali Nurg Qasid Inspectorate of Prisons
17	Mr Nazim Iqbal Mali Dist. Jail Lalki Marwat

These employees will be on probation for a period of one year in term of Rule 13(1) of the Government of Punjab (Service) Appointments, Promotion & Transfer Rules 1989 and Rule 13(1) of the Government of Punjab (Service) Act 1973.

*[Signature]*  
INSPECTOR GENERAL OF PRISONS,  
HYBER PAKHTUNKHWA, PESHAWAR

- 1. For information, General, Hyber Pakhtunkhwa Peshawar.
- 2. For information, Commandant Prison Peshawar, Haripur, Bannu & D.I. Khan
- 3. For information, District Jail Lalki Marwat, Karak.
- 4. For information, Sub Jail Dir Upper
- 5. For information, Deputy Inspector
- 6. For information, Officer concerned for information

*[Signature]*  
INSPECTOR GENERAL OF PRISONS,  
HYBER PAKHTUNKHWA PESHAWAR

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO. 22545

DATED 27/8/2017

495

*[Handwritten signature]*  
Inspector General of Prisons

**NOTIFICATION**

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, Final Seniority list of Restorer, Naib Qasid, Water Carrier, Mali, Chowkidar, Pipe Fitter & Sweeper as it stood on 01-01-2017 is notified/circulated:-

S#	NAME OF OFFICIAL with ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT.	DATE OF FIRST ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION			PRESENT APPOINTMENT with place of posting	Remarks.
				DATE	BPS	METHOD OF APPOINTMENT		
1.	Muhammad Yousaf (FA).	26-3-1966(Haripur).	01-2-1996	01-2-1996	02	Direct.	Sweeper CP Haripur.	
2.	Mr.Rooh-ul-Amin(Matric).	01-4-1979(Peshawar).	17-8-1998	17-8-1998	03.	-do-	Restorer. Inspectorate of Prisons.	
3.	Mr.Aurang Zeb Khan (Matric).	09-12-1975(Peshawar).	01-8-1999	01-8-1999	02	-do-	Sweeper. CP Peshawar.	
4.	Muhammad Shafiq (Matric).	10-3-1983(Charsadda).	04-9-2003	04-9-2003	02	-do-	Sweeper. CP Peshawar.	
5.	Mr.Gul Shad Ali (Matric).	30-9-1978(Charsadda).	25-9-2003	25-9-2003	02	-do-	Pipe Fitter. CP Peshawar.	
6.	Mr.Daud Nasir(Matric).	1984(Bannu).	08-10-2004	08-10-2004	02	-do-	Sweeper. CP Bannu.	
7.	Mr.Yousaf Khan(Matric).	02-3-1978(Dir Upper).	24-11-2005	24-11-2005	02	-do-	Sweeper.Sub Jail Dir Upper.	
8.	Mr.Fazal Mehmood Khan. (Matric).	05-4-1981(Bannu)	02-9-2009	02-9-2009	02	-do-	Mali.CP Bannu.	
9.	Muhammad .Imtiaz Khan.(Matric).	01-4-1961(Karak).	09-9-2009	09-9-2009	02	-do-	Sweeper.CP Bannu.	
10.	Mr.Gul Dad Khan(FA).	03-1-1976(Bannu).	25-1-2012	25-1-2012	02	-do-	Sweeper.CP Bannu.	
11.	Mr.Sikandar Hayat(Matric).	15-1-1984(Karak).	31-1-2012.	31-1-2012	02	-do-	Mali.Distt; Jail Karak.	

*[Handwritten signature]*

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

497

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

DATED

27/8/2007

*[Signature]*  
Peshawar

12.	Muhammad Bashir(Matric).	03-3-1982(Karak)	31-7-2012	31-7-2012	02	-do-	Sweeper.Distt; Jail Karak.	
13.	Muhammad Ayub Khan.	11-1-1984(Peshawar).	14-6-2003	14-6-2003	02	-do-	Sweeper.CP Peshawar.	His date of appointment is 14-6-2003 and SSC acquired by him during service in the year 2012, therefore, according to service rules his seniority was placed in his due place in the year 2012.
14.	Mr.Akbar Shahzad(Matric).	14-4-1986(Karak).	31-7-2012	31-7-2012	02	-do-	Sweeper.Distt; Jail Karak.	
15.	Mr.Naseem Khan (B.A).	16-8-1980(Peshawar).	17-8-2012	17-8-2012	02	-do-	Water Career. Inspectorate of Prisons.	
16.	Mr.Shamsher Ali Khan (Matric).	01-1-1979(Bannu)	18-4-2013	18-4-2013	02	-do-	Sweeper.CP Bannu.	
17.	Muhammad Yousif (Matric).	20-5-1984(D.I.Khan)	24-6-2004	24-6-2004	02	-do-	Sweeper, CP D.I.Khan.	His date of appointment is 24-6-2004 and SSC acquired by him during service in the year 2013, therefore, according to service rules his seniority was placed in his due place in the year 2013.

*[Signature]*

118

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

NO.

DATED 27/3/2017

18.	Muhammad Arif(F.A).	02-5-1977(Peshawar).	21-5-2014	21-5-2014	02	-do-	Naib Qasid. Inspectorate of Prisons.
19.	Mr.Ihsanullah(B.A).	21-3-1993(Charsadda).	22-5-2014	22-5-2014	02	-do-	Naib Qasid. Inspectorate of Prisons.
20.	Mr.Rashid Mubarak(Matric).	18-10-1984(Peshawar).	01-9-2014	01-9-2014	02	-do-	Sweeper. Inspectorate of Prisons.
21.	Mr.Naveed Iqbal(Matric).	06-4-1990(Lakki Marwat).	01-9-2014	01-9-2014	02	-do-	Mal. Distt; Jail Lakki Marwat.
22.	Mr.Imran Qayyum(Matric).	27-7-1978(Peshawar).	02-9-2014	02-9-2014	02	-do-	Naib Qasid. Inspectorate of Prisons.
23.	Mr.Amriz Ali(Matric).	01-1-1983(Nowshera).	04-9-2014	04-9-2014	02	-do-	Chokidar. Inspectorate of Prisons.
24.	Mr.Hukam Zad Khan (Matric).	20-10-1981(Bannu).	09-2-2015	09-2-2015	02	-do-	Sweeper. CP Bannu.
25.	Kishwar Hussain (FSc).	01-1-1993(Bunir).	04-3-2015	04-3-2015	02	-do-	Sweeper. Distt; Jail Bunir.
26.	Mr.Sulaiman Ali (FA).	01-8-1993(Lakki Marwat)	06-4-2015	06-4-2015	02	-do-	Water Carrier .Distt; Jail Lakki Marwat.
27.	Mr.Ahmad Khan (Matric).	(Bannu)	01-6-2015	01-6-2015	02	-do-	Sweeper. CP Bannu.
28.	Mr.Zeeshan (F.A).	05-4-1982(Nowshera)	19-1-2016	19-1-2016	02	-do-	Sweeper, Judicial Lockup Nowshera.
29.	Miss. Ashwani Prain(B.Sc).	18-8-1994(Peshawar).	01-4-2016	01-4-2016	02	-do-	Naib Qasid. Inspectorate of Prisons.

*(Signature)*

OFFICE OF THE  
INSPECTOR GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

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

DATED \_\_\_\_\_

30.	Muhammad Farooq(B.A.)-	03-3-1995(Mardan).	04-7-2016	04-7-2016	02	-do-	Mali, CP Mardan.
31.	Mr.Nazar Sheeraz(Matric).	03-3-1987(Mansehra).	25-10-2016	25-10-2016	-2	-do-	Sweeper CP Haripur.
32.	Mr.Simon Javed (F.A).	07-10-1994(Peshawar).	17-10-2016	17-10-2016	02	-do-	Sweeper CP Peshawar.

INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.

Dated 27/9/2017

NDST;NO. 22546-57.01.

Copy of the above is forwarded to :-  
The Superintendents Central Prison Peshawar, Haripur, Bannu, Mardan & D.I.Khan.  
The District Jail Lakki Marwat, Karak & Bunir.  
The Superintendent, Sub Jail Dir Upper.  
The Superintendent, Judicial Lockup Nowshera.  
Office Accountant.

For information of the officials concerned.

*Ok*  
*Amir*  
ASSISTANT DIRECTOR (ADMIN)  
FOR INSPECTOR GENERAL OF PRISONS,  
KHYBER PAKHTUNKHWA PESHAWAR.



(24)

To,

The Inspector General of Prison  
Khyber Pakhtunkhwa, Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED  
ORDER VIDE DATED 01.04.2022 AND ORDER VIDE  
DATED 17.05.2022 ISSUED BY THE COMPETENT  
AUTHORITY.

Prayer

THAT ON ACCEPTANCE OF THE INSTANT  
DEPARTMENTAL APPEAL THE IMPUGNED ORDER  
VIDE DATED 01.04.2022 & ORDER VIDE DATED  
17.05.2022 MAY PLEASE BE SET ASIDE AND THE  
APPELLANT MAY PLEASE BE PROMOTED FROM THE  
DATE ON WHICH HIS JUNIOR COLLEAGUES HAVE  
BEEN PROMOTED.

Respected Sir,

The appellant submits as under.

1. That the appellant is appointed on dated 03.08.2017 as a sweeper in Civil Prison Mardan and was placed at serial No.11 of the seniority list i.e 28.08.2018.
2. That the appellant is qualified upto F.A and as per rules the appellant is entitled to be promoted. (Copy of educational documents are attached).
3. That the as per seniority list issued on dated 28.08.2018 the name of the appellant is at serial No.11 however official Junior to the appellant namely (1) Muhammad Rehman (2) Zeeshan (3) Muslim Shah (4) Muhammad Zahid (5) Said Anwar Shah and (6) Saleem Khan who are at S.NO.13, 14, 15, 22, 33 and 37 respectively has been promoted to the post of Junior Clerk PBS-11), while the appellant was differed.

(22)

Clerk. The appellant was also handed over in official order vide dated 01.04.2022.

5. That the official order vide dated 01.04.2022 is against the service rules dated 15.04.2022 S.No.37 column No.4.
6. That previously some of the officials appointed in the year 2017 have been promoted without qualifying typing test hence the appellant is also entitled to be treated retrospectively.

It is therefore, most humbly prayed that *on acceptance of the instant departmental appeal the impugned order vide dated 01.04.2022 & order vide dated 17.05.2022 may please be set aside and the appellant may please be promoted from the date on which his junior colleagues have been promoted.*

Dated: 04.04.2024

Appellant

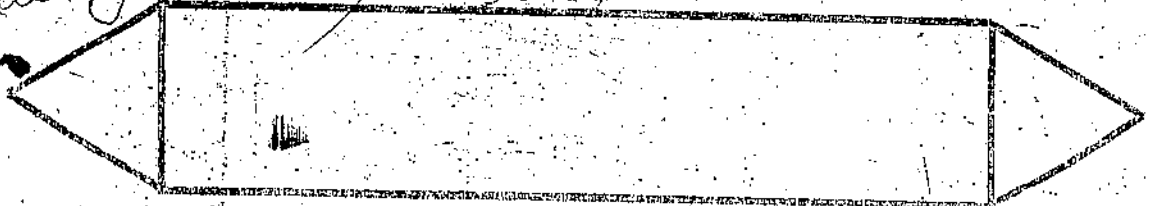
Waseem Ullah (Sweeper)  
S/o Mohib Ullah  
Civil Prison Mardan.

Waseem Ullah

Accepted to be  
a true copy

*[Signature]*

Qamari Gul Advocate  
High Court Peshawar



۲۰۲۰ء منجانب اسرار

مورخہ

و سعید محمد  
بنام P. 19

مقدمہ

دعویٰ

جرم

### باعث تحریر پر آنکے

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

آن مقام سندھ کیلئے **انجمن عدلیہ** ، نوبت جان ابرو سندھ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے کے تقرر ثالث و فیصلہ پر حلف دیے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ از عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

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

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

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

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے

اور اس کا ساختہ پرداختہ منظور و قبول ہوگا و درآن مقدمہ میں جو خرچہ ہر جاتہ التوائے مقدمہ ہوں گے

سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

صحت اللہ سے جان