


FORM OF ORDER SHEET

Court of _____

Appeal No. 1830 /2024

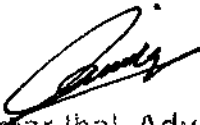
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/10/2024	<p>The appeal of Mr. Farman Abbas resubmitted today by Mr. Qamar Iqbal Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 14.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>


The appeal of Mr. Farman Abbas received today i.e on 04.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of appellant and respondents no. 3 to 8 are incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Memorandum of appeal is not signed by the appellant.
- 3- Copy of order dated 17.05.2022 is incomplete be completed.
- 4- Copy of service rules dated 15.04.2022 attached with the appeal are illegible be replaced by legible/better one.


No. 878 /Inst./2024/KPST,

Dt. 07/10 /2024.


Qammar Ibal Adv.
High Court at Peshawar.


ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

*Re-submitted after removal
of objections.*


18/10/2024

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 1830 /2024

Farman Abbas

VERSUS


Inspector General of Prison, Peshawar & others

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APPELLANT

Through


Qamar Iqbal
Advocate, High Court
Peshawar.

Dated: 4-10-2024

②

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 1830 /2024

Farman Abbas Sweeper CP Mardan.

Appellant

VERSUS

1. Inspector General of Prison, Peshawar.
2. Superintendent Central Prison, Mardan.
3. Muhammad Zahid Interment Centre Khar Bajaur as Junior Clerk PBS-11. Vice No.15.
4. Syed Anwar Shah Inspectorate of Prison as Junior Clerk BPS-11.
5. Saleem Khan Central Prison Peshawar as Junior Clerk BPS-11)
6. Attiq Ullah Central Prison Bannu as Junior Clerk BPS-11.
7. Muhammad Khalil District Jail Swat as Junior Clerk BPS-11.
8. Zeeshan Khan Sub Jail Jamraud as Junior Clerk BPS-11.

Respondents

APPEAL U/S-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 27.05.2024 BASED ON ILLEGAL ORDERS OF TYPING TEST AND SUBSEQUENT PROMOTION ORDER AND FINALLY EXCLUSION OF THE APPELLANT FROM THE SENIORITY LIST VIDE ORDER DATED 27.05.2024 WHICH ARE AGAINST THE SERVICE RULE WHEREBY THE APPELLANT WAS DECLARED INELIGIBLE FOR PROMOTION.

Prayer:-

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED ORDERS OF TYPING TEST, PROMOTION AND SUBSEQUENTLY EXCLUSION OF THE APPELLANT FROM THE SENIORITY LIST VIDE ORDER DATED 27.05.2024 MAY VERY GRACIOUSLY BE SET ASIDE & THE NAME OF THE APPELLANT MAY PLEASE BE INSERTED IN THE SENIORITY LIST AND ANTE DATED PROMOTION MAY ALSO KINDLY BE GRANTED TO THE APPELLANT.

ANY OTHER RELIEF DEEMED APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE NOT SPECIFICALLY ASKED FOR, MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth,

That the appellants submit as under:-

FACTS:

1. That the appellant being eligible was appointed as sweeper (PBS-IV) in the respondent department.
2. That since appointment the appellant is performing his duty regularly and efficiently.
3. That the respondents department pick and choose the appellant's junior colleagues on the pretext of an illegal order regarding order of typing test. (Copy of order dated 01.04.2022 is attached as annexure "A").
4. That the respondents department promoted the respondents No. 3 to 8 who are most junior to the appellant and the appellant was differed. (Copy of promotion order dated 17.05.2022 is attached as annexure "B").
5. That the respondent issued a tentative seniority list of class-IV on 01.01.2024 which the appellant was at S.No.13 (Copy of tentative list dated 01.01.2024 is attached as annexure "C").
6. That once again on dated 27.05.2024 the respondents issued official order whereby, the name of appellant was excluded on the pretext of 3rd Divisioner. And described that the requirements of the illegibility for the promotion to the post of Junior Clerk PBS-11 is at least 2nd Division qualification which is against the service rules 15.04.2022. (Copy of order dated 27.05.2024 is attached as annexure "D").
7. That the respondents issued another tentative seniority list of class-IV on date 01.03.2024 wherein, the name of the appellant was removed / excluded in the grounds, that minimum qualification for promotion from PBS-04 to PBS-11 is FA/FSc at least possessing 2nd Division qualification. (Copy of tentative list is attached as annexure "E").
8. That neither the typing test nor 3rd Division qualification has been described in the service rules dated 15.04.2022 for

promotion to the higher post (Copy of rules dated 15.04.2022 is attached as annexure "F").

9. That the appellant move departmental appeal against the impugned order vide dated 27.05.2024 to the respondents but no response is yet received. (Copy of departmental appeal is attached as annexure "G").
10. That feeling aggrieved from the action and inaction of the department and impugned order vide dated 27.05.2024 the appellant approaches to this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That the impugned order vide dated 27.05.2024 and following two other impugned orders are against the law and rule No. SO (P&R)/1/33/2021 notified on dated 15.04.2022.
- B. That the appellant has been appointed in the year 2017 therefore, the appellant is entitle to be treated retrospectively because previously some official were promoted without qualifying typing test.
- C. That non promoting the appellant is gross violation of S.No.37 column No.4 of service rule issued on dated 15.04.2022.
- D. That the appellant has not been promoted by the respondents due to malafidely.
- E. That the appellant has not been treated equally according the constitution of Islamic Republic of Pakistan 1973.
- F. That junior colleagues of the appellant have been promoted which is clear violation of the right of the appellant.
- G. That the appellant is qualified upto FA and rules described qualification for promotion upto matriculate.
- H. That the exclusion of 3rd Divisioner from promotion is against the law and rules.
- I. That the appellant is eligible to the post of Junior Clerk.

(5)

- J. That issuance of 2nd tentative seniority list for class-IV is against the law and rules.
- K. That the appellant is entitled to be included in the 2nd tentative seniority list of class-IV for promotion issued on dated 01.03.2024.
- L. That any other ground which is not specifically mentioned will be taken at the time of arguments with the prior permission of this Hon'ble Tribunal on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of this appeal the impugned orders of typing test, promotion and subsequently exclusion of the appellant from the seniority list vide order dated 27.05.2024 may very graciously be set aside & the name of the appellant may please be inserted in the seniority list and ante dated promotion may also kindly be granted to the appellant..


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

Interim Relief

By way of Interim Relief the respondent No.1 & 2 may please be restrained from preparing final seniority list till the final disposal of the instant appeal.

APPELLANT

Through

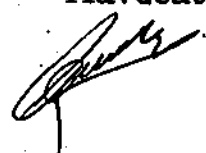

Qamar Iqbal
Advocate, High Court
Peshawar.

Dated: 4/10/2024

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.



15

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

Farman Abbas

VERSUS

Inspector General of Prison, Peshawar & others

AFFIDAVIT

I, Farman Abbas Sweeper CP 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.

Farman Abbas

DEPONENT

Identified by:

Qamar Iqbal
Advocate High Court
Peshawar.

ATTESTED



27/09-2024

(8)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S:A No. _____/2024

Farman Abbas

VERSUS

Inspector General of Prison, Peshawar & others

ADDRESSES OF PARTIES

PETITIONER.

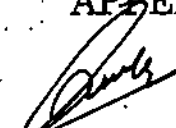
Farman Abbas Sweeper CP Mardan.

ADDRESSES OF RESPONDENTS

1. Inspector General of Prison, Peshawar.
2. Superintendent Central Prison, Mardan.
3. Muhammad Zahid Interment Centre Khar Bajaur as Junior Clerk PBS-11. Vice No.15.
4. Syed Anwar Shah Inspectorate of Prison as Junior Clerk BPS-11.
5. Saleem Khan Central Prison Peshawar as Junior Clerk BPS-11).
6. Attiq Ullah Central Prison Bannu as Junior Clerk BPS-11.
7. Muhammad Khalil District Jail Swat as Junior Clerk BPS-11.
8. Zeeshan Khan Sub Jail Jamraud as Junior Clerk BPS-11.

APPELLANT

Through


Qamar Iqbal
Advocate, High Court
Peshawar.

Dated: 09/10/2024



7

OFFICE OF THE
SUPERINTENDENT
CENTRAL PRISON MARDAN
Phone/Fax: 0937-849114
Email: mardanjail@gmail.com

No. 186a/WE Dated: 1/4/2022

To,

The Inspector General of Prisons,
Khyber Pakhtunkhwa Peshawar.

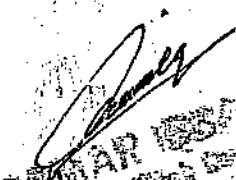
Subject:

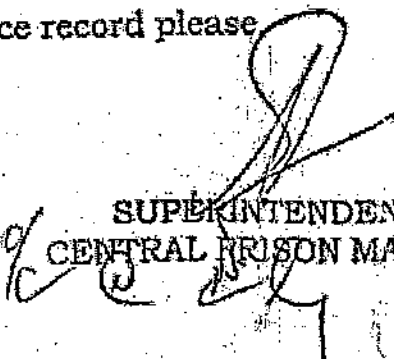
TYPING TEST OF CLASS-IV ESTABLISHMENT FOR THE POST OF
JUNIOR CLERK (BPS-11) UNDER 25% QUOTA.

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


SARTAJ KHAN
SUPERINTENDENT
CENTRAL PRISON MARDAN


SUPERINTENDENT
CENTRAL PRISON MARDAN

respect of Mr. Zeeshan Sweeper is returned herewith which may please be acknowledged.
 9. Office Accountant, Inspectorate General of Prisons Khyber Pakhtunkhwa for information and necessary action.
 10. The District Account Officers concerned for information.

ASSISTANT DIRECTOR
 FOR INSPECTOR GENERAL OF PRISONS
 KHYBER PAKHTUNKHWA PESHAWAR

**INSPECTORATE GENERAL OF PRISONS
 KHYBER PAKHTUNKHWA PESHAWAR**

No. 001-0210334, 0210406 021-0210445
 15.682 1-16

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**

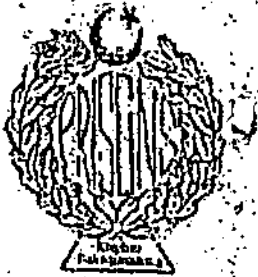
I am directed to refer to your letter No. 854/WF dated 19-04-2022 on the subject
 and to return herewith the below noted documents as noted against the names of the following
 Class-IV Employees received with your letter under reference:

Sl. No.	Name of official with designation	Name of documents
1.	Muhammed Feroq, Mail	Service Book (In-original); SSC (In-original)
2.	Muhammad Rahman, Sweeper	-do-
3.	Zeeshan S/O Usman Zar, Sweeper	-do-
4.	Muslim Shah, Sweeper	-do-
5.	Muhammad Zohid, 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.	Asfandiyar, 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 Basit, 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

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



(8)

**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

☎ 091-9210334,
9210406

☎ 091-9213445

No. 186 - 15622 /

Dated 17-05-2022

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 25% quota:

S#	NAME OF EMPLOYEES	CLASS-IV	NAME OF JAIL/OFFICE WHERE PRESENTLY POSTED
1.	Zaeshan S/O Rahmat Lal		Sweeper at Sub Jail Nowshera
2.	Mohsin Khan S/O Abdul Khilab		Walter at Borslal Institute Bannu
3.	Muhammad Farooq		Mall at Central Prison Mardan
4.	Muhammad Rahman		Sweeper at Central Prison Mardan
5.	Zaeshan 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.	Saleem Khan		Sweeper at Central Prison Peshawar
10.	Aliq Ullah S/O Naseer Shah		Cook at District Jail Lakki Marwat
11.	Muhammad Khalil		Photostat Machine Operator at Central Prison Mardan
12.	Zaeshan 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:

S#	Name of officials	From	To
1.	Zaeshan 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	B.I. Bannu as Walter.	Sub Jail Sadda (Kurram) as Junior Clerk (BPS-11) against the vacant post.
3.	Muhammad Farooq	Central Prison Mardan as Mall.	Sub Jail Besham 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.	Zaeshan 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 Ghallana (Muhmand) 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) vice 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.	Saleem Khan	Central Prison Peshawar as Sweeper.	Central Prison Peshawar as Junior Clerk (BPS-11) against the vacant post.
10.	Aliq Ullah S/O Naseer Shah	District Jail Lakki 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.	Zaeshan 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. Lalba Zafar Junior Clerk (BPS-11)	Inspectorate of Prisons Peshawar.	District Jail Mansehra against the vacant post.
14.	Shahbaz Khalid Junior Clerk (BPS-11)	Inspectorate of Prisons Peshawar.	Central Prison Mardan against the vacant post.

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Date: 11/11/2024
Registrar

DEPARTMENT OF KHYBER PAKHTUNKHWA I.E. RESTORER, NAIB QASID, WATER CARRIER/BEHISHTI, PHOTOSTATE MACHINE OPERATOR, TUBEWELL OPERATORS, PLUMBERS, ENGINE MAN, DHOBIS, CHOWKIDAR, MALI, PIPE FITTER & SWEEPERS INCLUDING HOLDING OTHER EQUIVALENT POSTS AS IT STOOD ON 01-01-2024

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
				DATE	BPS	METHOD OF APPOINTMENT	
1.	Simon Javed (F.A)						
2. ✓	Wasim Ullah (FA)	07-10-1994 (Peshawar)	17-10-2016	17-10-2016	03	Direct	Sweeper CP Peshawar.
3.	Tabir Muhammad (BA)	15-03-1988 (Mardan)	05-08-2017	05-08-2017	03	Direct	Sweeper CP Mardan.
4.	Altaullah S/O Jamshed (F.A)	03-01-1980 (Mardan)	19-08-2017	19-08-2017	03	Direct	Mali CP Mardan.
5.	Abid Ali S/O Sar Zamin	01-04-1991 (Mardan)	19-08-2017	19-08-2017	03	Direct	Cook at CP Mardan.
6.	Khalid Khan S/O Mir Kamran (B.A)	04-04-1990 (Mardan)	24-08-2017	24-08-2017	03	Direct	Cook at CP Mardan.
7.	Sartaj Khan S/O Sarwar Khan (B.A)	10-01-1987 (Mardan)	25-08-2017	25-08-2017	03	Direct	Cook at CP Mardan.
8.	Sher Zaman S/O Abdur Rehman (M.A)	19-07-1977 (Mardan)	26-08-2017	26-08-2017	03	Direct	Cook at CP Mardan.
9. ✓	Gul Muhammad Said (FA)	03-11-1985 (Mardan)	26-08-2017	26-08-2017	03	Direct	Cook at CP Mardan.
10.	Irfanullah (D.Com)	05-01-1986 (Mardan)	26-08-2017	26-08-2017	03	Direct	Cook at CP Mardan.
11.	Sartaj Khan S/O Amir Zada (F.A)	22-01-1993 (Mardan)	26-08-2017	26-08-2017	03	Direct	Cook at CP Mardan.
12.	Sifat Ullah S/O Mohsin Khan (F.A)	01-01-1994 (Mardan)	26-08-2017	26-08-2017	03	Direct	Sweeper CP Mardan.
13. ○	Farran Abbas (FA)	03-03-1998 (Mardan)	26-08-2017	26-08-2017	03	Direct	Sweeper CP Mardan.
14.	Muhammad Adil S/O Habib ur Rehman (F.A)	04-5-1999 (Mardan)	26-08-2018	26-08-2018	03	Direct	Cook at CP Mardan.
15.	Yasir Ali S/O Muzamil Khan (F.A)	10-09-1990 (Mardan)	24-08-2018	24-08-2018	03	Direct	Cook at CP Mardan.
16.	Asthandyar S/O Sahibzada (B.A)	12-05-1994 (Mardan)	31-08-2018	31-08-2018	04	Direct	Sweeper CP Mardan.
17.	Abdullah S/O Muhammad Inam (F.A)	04-04-1987 (Mardan)	01-09-2018	01-09-2018	03	Direct	Photo Stat Machine Operator at Central Prison Mardan.
18.	Tariq Iqbal S/O Khalil ur Rehman (F.A)	18-02-1990 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan.
19.	Naveed Khan S/O Fazal Khan (F.A)	10-06-1992 (Mardan)	01-09-2018	01-09-2018	03	Direct	Dhobi at CP Mardan.
20.	Amir Khan S/O Habib ur Rehman (F.A)	12-02-1993 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan.
21.	Naseer Ahmad S/O Jehangir Khan (F.A)	02-04-1993 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan.
22.	Muhammad Basit S/O Fazal ur Rehman (F.A)	15-06-1993 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan.
23.	Aqib Ali S/O Amin Gul (M.com)	16-03-1998 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan.
24.	Neelam D/O Muhammad Shaeed (F.A)	06-08-1995 (Mardan)	01-09-2018	01-09-2018	03	Direct	Baker at CP Mardan.
25.	Muhammad Usman (M.A Islamiyat)	02-02-2000 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan.
26.	Fazal Maqula S/O Abdur Wadod (Matric in 2019 & F.A in 2021)	23-04-1987 (Lakki Mwat)	01-09-2018	01-09-2018	03	Direct	Plumber at CP Mardan.
		01-01-1993 (Mardan)	28-12-2018	28-12-2018	03	Direct	F.M Attendant at CP Mardan.
			04-08-2017				

Inter the o main acco of res. appoi as fro acqui

Advocate Nighat Ali

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
				DATE	BPS	METHOD OF APPOINTMENT	
27	M. Adeel S/O Malik Jehanzeb (FA)	24-02-1990 (D.I Khan)					
28	Gul Zaman S/O Abdul Sattar (HSSC)	18-02-1988 (D.I Khan)	20-03-2019	20-03-2019	03	Direct	Plumber at GP D.I Khan
29	Zabih Ullah S/O Gul mal (HSSC & DIT)	01-01-1994 (D.I Khan)	13-03-2020	13-03-2020	03	Direct	Dhobi at CP D.I Khan
30	Afsar Ullah S/O Bakht Ali Khan (FA)	25-03-1989 (Bannu)	13-03-2020	13-03-2020	03	Direct	Sweeper at CP D.I Khan
31	Feroz Ali S/O Mehmood Ali (B.A. & DIT)	12-03-1994 (Bannu)	07-05-2020	07-05-2020	03	Direct	Baker at C.P. Bannu
32	Raza Muhammad S/O Zafar Muhammad (F.A)	01-01-1983 (Mardan)	04-08-2017	04-08-2017	03	Direct	Dhobi at CP Bannu
33	Shadman Ullah S/O Gul Raees Khan (FA)	01-01-2000 (Bannu)	07-05-2020	07-05-2020	03	Direct	Sweeper at C.P. Mardan
34	Azeem Khan S/O Abdul Hameed (F.Sc)	20-08-1991 (Abbottabad)	03-08-2020	03-08-2020	05	Direct	Dhobi at C.P. Bannu
35	Muhammad Saqib S/O Muhd. Nawaz (M.A & DAE)	20-01-1988 (D.I Khan)	05-11-2020	05-11-2020	05	Direct	Photostat machine operator at DJ Abbottabad
36	Zaini Shafiq S/O Shafiq Masih (F.A)	18-07-1987 (Peshawar)	09-11-2020	09-11-2020	03	Direct	Tube Well Operator at CP D.I.K
37	Jabir Ali (F.A)	02-07-1997 (Peshawar)	11-11-2020	11-11-2020	05	Direct	Sweeper at C.P. Peshawar
38	Saad Ali S/O Pasham Ali (F.Sc)	01-04-1996 (Kohat)	09-12-2020	09-12-2020	03	Direct	Photostat machine operator Inspectorate of Prisons
39	Huzafa Khan S/O Zubair Khan (B.A)	10-09-1999 (Kohat)	09-12-2020	09-12-2020	03	Direct	Baker at DJ Kohat
40	Mohsin Ali Shah S/O Amjad Hussain Shah (DAE)	05-11-1993 (Haripur)	05-01-2021	05-01-2021	03	Direct	Executioner at DJ Kohat
41	Mubeen Khan S/O Anayat Ur Rehman (F.A)	15-10-1995 (Swat)	02-02-2021	02-02-2021	03	Direct	Baker at C.P. Haripur
42	Sarfraz Ahmed S/O M. Yousaf (B.A)	03-08-1988 (Abbottabad)	23-02-2021	23-02-2021	03	Direct	Cook at Distt. Jail Swat
43	Imran S/O Fazal Salam (B.A & DIT)	03-04-1994 (Charsadda)	19-03-2021	19-03-2021	03	Direct	Cook at DJ Atd
44	Sadeed ur Rehman S/O Shams ur Rehman (F.Sc)	20-03-1997 (Buner)	27-03-2021	27-03-2021	03	Direct	Plumber at S.J Charsadda
45	Sarfraz Ahmad Jah (B.A)	26-10-1994 (Peshawar)	08-04-2021	08-04-2021	05	Direct	Baker at Distt. Jail Buner
46	Muhammad Altaf S/O Gul Nawaz (F.A)	16-02-1991 (D.I Khan)	05-05-2021	05-05-2021	03	Direct	Photostat Machine Operator at CP Peshawar
47	Mr. Abdul Qadeer S/O M. Younus (F.A)	05-05-1998 (D.I Khan)	05-05-2021	05-05-2021	03	Direct	Baker at C. P.D.I. Khan
48	Muhd Farooq S/O Sheikh Mushtaq (F.A)	03-01-1999 (D.I Khan)	05-05-2021	05-05-2021	03	Direct	Sweeper at C.P. D.I Khan
49	Mr. Ihsan Ullah Khan S/O Mehmood Khan (F.A)	01-04-1994 (D.I Khan)	06-05-2021	06-05-2021	03	Direct	Printer at C.P. D.I Khan
50	Mr. Abdul Samad S/O Shafi Ullah (DAE)	01-01-2001 (D.I Khan)	06-05-2021	06-05-2021	03	Direct	Maid at C.P. D.I Khan
51	Mr. Asmat Ullah S/O Iqbal Hussain (F.A)	10-01-1996 (D.I Khan)	26-05-2021	26-05-2021	03	Direct	Waiter at C.P. D.I Khan
52	Bishar S/O Shamsur Rahman (FA)	08-08-1997 (Battagram)	26-05-2021	26-05-2021	03	Direct	Baker at C.P. D.I Khan
53	Ibrar Naseem S/O Muhd Naseem (F.Sc)	13-01-2000 (Battagram)	26-05-2021	26-05-2021	03	Direct	Sweeper at S.J. Battagram
54	Asmat Ullah S/O Muhd Hashim (B.A)	01-04-1999 (D.I Khan)	01-06-2021	01-06-2021	03	Direct	Maid at S.J. Battagram
55	Shanzeb Khan (F.A)	21-10-2000 (Peshawar)	01-11-2021	01-11-2021	03	Direct	Baker at C.P. D.I Khan
56	Naveed Ahmad Khan S/O Bashir Ahmad (B.A)	26-04-1998 (Swat)	04-11-2021	04-11-2021	03	Direct	Waiter at C.P. Peshawar
57	Fazal Khalid S/O Nasray (BA)	06-02-1996 (Swat)	05-11-2021	05-11-2021	03	Direct	Waiter at D.J. Swat
58	Muhd. Sohail Khan S/O Sahar Gul (F.Sc)	08-01-2000 (Swat)	05-11-2021	05-11-2021	03	Direct	Waiter at D.J. Swat
59	Murad Ali S/O Aziz Ur Rahman (F.A)	05-03-2000 (Swat)	05-11-2021	05-11-2021	03	Direct	Waiter at D.J. Swat
60	Hammad Khan S/O Haibat Khan (F.A)						

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
				DATE	BPS	METHOD OF APPOINTMENT	
61.	Amjad S/O Muhammad Yousaf (BA)						
62.	Kiyatullah S/O Chulani Bahadar (F.A)	18-04-1994(Dir Lower)	22-11-2021	22-11-2021	03	Direct	Dhobi at D.J Timergara
63.	Izaz Ahmad S/O Jehan Dastagir (FSc)	04-08-1996(Dir Lower)	22-11-2021	22-11-2021	03	Direct	Waiter at D.J Timergara
64.	Sulman Khan S/O Iqbal (F.A)	10-03-1997(Dir Lower)	22-11-2021	22-11-2021	03	Direct	Waiter at D.J Timergara
65.	Zarak Khan S/O Faridoo Khan(F.A)	14-04-1998(Dir Lower)	22-11-2021	22-11-2021	03	Direct	Sweeper at D.J Timergara
66.	Muhammad Ashfaq S/O Zakir Ullah (F.A)	26-02-1992 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
67.	Shahzad Khan S/O Usqat Ali Khan (F.Sc)	20-08-2001 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
68.	Yasir Muhammad S/O Fazl Muhammad (F.Sc)	14-07-2001 (Peshawar)	20-12-2021	20-12-2021	03	Direct	Naib Qasid at RPO Peshawar
69.	Masood Badshah S/O Gul Nasseem (F.A)	09-03-1997 (Karak)	03-01-2022	03-01-2022	03	Direct	Baker at Central Prison Karak
70.	Sher Zada S/O Rahim Zada (F.A)	25-03-1996 (Malakand)	13-01-2022	13-01-2022	03	Direct	Waiter at Sub Jail Malakand
71.	Atiq Ullah S/O Muhammad Yousaf Khan (F.A)	16-03-1991 (Dir Lower)	01-02-2022	01-02-2022	03	Direct	Barber at D.J Timergara
72.	Muhammad Shahid Iqbal S/O Talib Gul (Msc)	04-06-1992 (Dir Lower)	01-02-2022	01-02-2022	03	Direct	Baker at D.J Timergara
73.	Faisal Wahab S/O Abdul Wahab (F.Sc)	02-03-1987 (Karak)	11-03-2022	11-03-2022	03	Direct	Mali at Central Prison Karak
74.	Abdul Rehman S/O Qadir Mughal; Ashraf (HSSC)	17-03-1998 (Karak)	11-03-2022	11-03-2022	03	Direct	Waiter at C.P Karak
76.	Ijaz S/O Attaullah Khan (F.A)	23-12-2000 (Umarwat)	11-03-2022	11-03-2022	03	Direct	Baker at DJ Lakki Marwat
76.	Muhammad Yaseeb S/O Payo Shah (F.A)	23-05-1992 (Buner)	01-04-2022	01-04-2022	03	Direct	Sweeper at District Jail Buner
77.	Yasir Ali S/O Latif Ullah (F.A)	11-02-1999 (Buner)	01-04-2022	01-04-2022	03	Direct	Sweeper at District Jail Buner
78.	Bakht Muhammad S/O Nazir Muhammad (M.A)	01-04-2001 (Buner)	01-04-2022	01-04-2022	03	Direct	Waiter at District Jail Buner
79.	Marifat Shah S/O Abullah Shah (F.A)	10-04-1992 (Mardan)	25-05-2022	25-05-2022	03	Direct	Sweeper at CP Mardan
80.	Nawaz Khan S/O Shamshad Khan (B.A)	13-02-1987 (Mardan)	26-05-2022	26-05-2022	03	Direct	Waiter at CP Mardan
81.	Ahmad Afs S/O Anwar Balg (F.Sc)	08-04-1987 (Mardan)	26-05-2022	26-05-2022	03	Direct	Sweeper at CP Mardan
82.	Muhammad Saqib S/O Tila Muhammad (F.A)	20-01-1998 (Mardan)	26-05-2022	26-05-2022	03	Direct	Waiter at CP Mardan
83.	Sulaiman Rahim S/O Muhammad Rahim (F.A)	11-03-1999 (Mardan)	26-05-2022	26-05-2022	03	Direct	Sweeper at CP Mardan
84.	Muhammad Sadiq S/O Muhammad Zaman (F.A)	01-01-1997 (Mardan)	27-05-2022	27-05-2022	03	Direct	Sweeper at CP Mardan
85.	Ihsan Ullah S/O Abdullah Jan (MA)	09-04-1995 (Mardan)	29-05-2022	29-05-2022	03	Direct	Pipe Fitter at CP Mardan
86.	Intikhab Iqbal S/O Qadir Rehman (F.Sc)	13-08-1984 (Lakki Marwat)	01-06-2022	01-06-2022	03	Direct	Dhobi at D.J Lakki Marwat
87.	Kamil Ahmed S/O Abdul Qudus Khan (B.A)	15-03-1999 (Lakki Marwat)	01-06-2022	01-06-2022	03	Direct	Waiter at D.J Lakki Marwat
88.	Muhammad Shahar S/O Ishaq Mughal (F.Sc)	10-05-1995 (Karak)	03-06-2022	03-06-2022	03	Direct	Baker at Central Prison Karak
89.	Mr. Anas Ahmed S/O Abdul Rehman (F.A)	28-04-1994 (Haripur)	10-06-2022	10-06-2022	03	Direct	Dhobi at CP Haripur
90.	Mr. Adil Khan S/O Kale Khan (F.Sc)	01-03-1995 (Haripur)	11-06-2022	11-06-2022	03	Direct	Waiter at CP Haripur
91.	Mr. Saqib Shaheer S/O M. Shaheer (F.A)	03-04-1998 (Haripur)	13-06-2022	13-06-2022	03	Direct	Baker at CP Haripur
92.	Zia Ur Rehman S/O Said Rehman (MA)	06-09-1999 (Haripur)	13-06-2022	13-06-2022	03	Direct	Baker at CP Haripur
93.	Muhammad Ashfaq Khan S/O Mirshad Khan(F.A)	01-02-1990 (Balaur)	15-06-2022	15-06-2022	03	Direct	Barber at SJ Khar Balaur
94.	Muhammad Ghani Khan S/O M. Nazir (HSSC)	19-10-2001 (Peshawar)	07-11-2022	07-11-2022	03	Direct	Cook at CP Peshawar
95.	Lughman Khan S/O Iqbal Khan (B.A)	27-02-1997 (Peshawar)	08-11-2022	08-11-2022	03	Direct	

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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
			DATE	BPS	METHOD OF APPOINTMENT	
Amjad Imran Khan S/O Muhi Aamir (B.A)	06-03-1983 (Peshawar)	11-11-2022	11-11-2022	03	Direct	Sweeper at CP Peshawar
Ali Ullah S/O Ghayas Ali (HSSC)	14-03-1993 (Peshawar)	14-11-2022	14-11-2022	03	Direct	Bakers at CP Peshawar
Amir Khan S/O Mushraf Khan (FA)	26-09-1990 (Kohat)	23-11-2022	23-11-2022	03	Direct	Baker at District Jail Kohat
Amir S/O Saeed Ahmed Khan (BA)	06-09-1997 (Kohat)	23-11-2022	23-11-2022	03	Direct	Sweeper at District Jail Kohat
Amjad Jasim S/O Arbab Khan (BA)	05-02-1998 (Kohat)	23-11-2022	23-11-2022	03	Direct	Cook at District Jail Kohat
Amir Ullah Rehman S/O Umer Gul (FSC)	10-04-1998 (Kohat)	23-11-2022	23-11-2022	03	Direct	Barber at District Jail Kohat
Amir Ahmad S/O Dost Muhammad (FA)	30-04-1999 (Kohat)	23-11-2022	23-11-2022	03	Direct	Waiter at DJ /IC Kohat
Amir Chahid S/O Dahan Chahid (FA)	20-07-2000 (Kohat)	23-11-2022	23-11-2022	03	Direct	Barber at DJ /IC Kohat
Amir Shahzeb S/O Muhammad Arif (FA)	04-01-2001 (Kohat)	23-11-2022	23-11-2022	03	Direct	Waiter at District Jail Kohat
Amir Ullah Rehman S/O Fazle Rabi (FA)	20-02-1993 (Mardan)	12-12-2022	12-12-2022	03	Direct	Sweeper at CP Mardan
Amir Ferooz S/O Liaqat Ali (F.Sc)	06-04-1995 (Charsadda)	12-12-2022	12-12-2022	05	Direct	Tube Well Operator at Sub Jail Charsadda
Amir Touseef S/O Amir Nawas (F.Sc)	29-11-1999 (Mardan)	19-12-2022	19-12-2022	03	Direct	Cook at CP Mardan
Samia Bibi S/O Ghulam Sarwar (M.A)	13-03-1994 (Mardan)	23-12-2022	23-12-2022	03	Direct	Attendant at CP Mardan

ATTESTED

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



13

EMAIL

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334; 9210406 | 📠 091-9213445

No. K:C 22422-31 /

Dated 17/08/2024 /

To

1. The Superintendents Central Prison Mardan, DI Khan, Peshawar and Haripur.
2. The Superintendents District Jail Abbottabad, Swat, Timergara, Buner and Kohat.
3. The Superintendents Sub Jail Malakand.

Subject:

PREPARATION OF REVISED JOINT SENIORITY LIST OF CLASS-IV EMPLOYEES OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT I.E. RESTORER, NAIB QASID, WATER CARRIER / BEHISHTI, PHOTOSTATE MACHINE OPERATORS, TUBE WELL OPERATORS, PLUMBERS, ENGINE MAN DHOBIS, CHOWKIDAR, MALI, PIPE FITTER & SWEEPERS INCLUDING HOLDING OF OTHER EQUIVALENT POSTS) AS STOOD ON 01-01-2024

Memo:

I am directed to refer to the subject and to convey that the following Class-IV staff posted at your jail possess Higher Secondary School Certificate (HSSC) or equivalent qualification but in 3rd division, whereas according to Service Rules, the requirement for eligibility for promotion to the post of Junior Clerk (BPS-11) is at least 2nd division in HSSC or equivalent qualification, therefore, they are ineligible for promotion:

S#	NAME OF OFFICIAL	PRESENT APPOINTMENT WITH PLACE OF POSTING
1.	Gul Muhammad Said ✓	Sweeper Central Prison Mardan
2.	Sifat Ullah S/O Momin Khan	Cook at Central Prison Mardan.
3.	Farman Abbas ✓	Sweeper Central Prison Mardan
4.	Yasir Ali S/O Muzamil Khan	Attendant at Central Prison Mardan
5.	Taq Iqbal S/O Khalil ur Rehman	Attendant at Central Prison Mardan.
6.	Naveed Khan S/O Fazal Khan	Attendant at Central Prison Mardan
7.	Naseer Ahmad S/O Jehangir Khan	Baker at Central Prison Mardan
8.	Gul Zaman S/O Abdul Sattar	Dhobi at Central Prison DI Khan
9.	Azoem Khan S/O Abdul Hameed	Photostat Machine Operator at DJ Abbottabad
10.	Zain Shafiq S/O Shafiq Masih	Sweeper at Central Prison Peshawar
11.	Mr. Abdul Qadeer S/O M. Younus	Sweeper at Central Prison DI Khan.
12.	Ihtan Ullah Khan S/O Mehmood Khan	Mali at Central Prison DI Khan
13.	Shahzeb Khan	Waiter at Central Prison Peshawar
14.	Fazal Khaliq S/O Nasray	Waiter at District Jail Swat
15.	Murad Ali S/O Aziz ur Rahman	Cook at District Jail Swat
16.	Amjad S/O Muhammad Yousaf	Dhobi at District Jail Timergara
17.	Masood Badshah S/O Gul Naseem	Waiter at Sub Jail Malakand
18.	Ijaz S/O Attaullah Khan	Sweeper at District Jail Buner
19.	Muhammad Yaseen S/O Payo Shah	Sweeper at District Jail Buner
20.	Muht Saqib S/O Tila Muhammad	Sweeper at Central Prison Mardan
21.	Sulaiman Rahim S/O Muht Rahim	Sweeper at Central Prison Mardan
22.	Mr. Saqib Shafique S/O M. Shafique	Baker at Central Prison Haripur
23.	Muhammad Jasim S/O Arbab Khan	Cook at District Jail Kohat
24.	Sadhan Chand S/O Dahan Chand	Barber at District Jail / I.C Kohat
25.	Muhammad Shahzeb S/O Muhammad Arif	Waiter at District Jail Kohat
26.	Khalil Ur Rehman S/O Fazle Rabi	Sweeper at Central Prison Mardan
27.	Fazal Maula S/O Abdul Wadood	Sweeper at Central Prison Mardan

Please inform them accordingly.

TESTED

[Signature]
ASSISTANT DIRECTOR



1224

INSPECTOR GENERAL OF PRISONS
ASSISTANT DIRECTOR (E)

ARRESTED

For information please

Copy of the above is forwarded to P.S. J.G. Prisons, Khyber Pakhtunkhwa

INSPECTOR GENERAL OF PRISONS
ASSISTANT DIRECTOR (E)
KHYBER PAKHTUNKHWA RESTHAWA

I am further directed to task you again to provide a list of the relevant categories of staff (if any) who are performing duties under your supervision and possess at least 2 Division EAF or equivalent qualification along with documentary proof (certified photocopy) of such certificate and to possess the requisite qualification. In case, any official of the subject categories of staff who possesses the requisite qualification, is left, then the responsibility will rest on the shoulders of Superintendent in charge all concerned.

CERTIFICATE
Certified that I have reviewed the list of staff of Senior Class IV staff as stood on 01-03-2024 and submitted the same to the concerned authority for their consideration.

It is directed to refer to this office letter No. 140W/2 dated 15-02-2024 on the subject and to forward herewith a revised tentative seniority list prepared under the rules of the subject cited. All subject cited as stood on 01-03-2024 with all their Division EAF or equivalent qualification performing duties under your supervision for circulation at the subject offices concerned for information and obtaining NOC on the below noted format from them and early submission to this office.

PREPARATION OF REVISED JOINT SENIORITY LIST OF CLASS IV EMPLOYEES OF KRK PRISONS DEPARTMENT, RESTHAWA, NAIB GASID WATER, CARRIER/BEHISHTI, PHOTOSTATE MACHINE OPERATORS, TUBEWELL OPERATORS, PLUMBERS, ENGINE MAN, DHOBI, CHOWKIDAR, MALL, PIPE FILTER & SWEEPERS INCLUDING HOLDING OF OTHER EQUIVALENT POSTS AS STOOD ON 01-03-2024

- 1. All P.O.s of Regional Prisons Offices in the Khyber Pakhtunkhwa
- 2. All Superintendents of Jail/Prison/Resthawa in the Khyber Pakhtunkhwa
- 3. Commandant Prisons Staff Training Academy, Hanjra
- 4. Office Accountant, Inspectorate, General of Prisons, Resthawa

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA RESTHAWA
No. 140W/2 dated 15-02-2024

URGENT/BY FAX



PROBATIONARY SENIORITY LIST OF CLASS IV EMPLOYEES WHO POSSESSES MINIMUM QUALIFICATION OF FA/FS AT LEAST 2ND DIVISION IN PRISONS DEPARTMENT HYBER PAKHTUNKHWA REST CREW, NAIP, OASIS, WATER CARRIER, BEHISHI, PHOTO STATE MACHINE OPERATORS, TUBEWELL OPERATORS, T.M.U ENGINE MAN, DHOBIS, CHOWKIDAR, MAIL, PIPE FITTERS, SWEEPERS INCLUDING HOLDING OF OTHER EQUIVALENT POSTS AS IT STOOD ON 01/03/2024.

SR#	NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT	DATE OF ENTRY INTO SERVICE	REGULAR APPOINTMENT/PROMOTION		PRESENT APPOINTMENT WITH PLACE OF POSTING	REMARKS
				DATE	BPS# METHOD OF APPOINTMENT		
1	Simra Javed S/O Javed Masim (FA)	07-10-1994 (Peshawar)	17-10-2016	17-10-2016	03 Direct	Sweeper at CP Peshawar	Interim
2	Wasim Ullah S/O Mohib Ullah (FA)	16-08-1988 (Mardan)	05-08-2017	05-08-2017	03 Direct	Sweeper CP Mardan	Senior official
3	Tahir Muhammad S/O Awal Dini (BA)	03-01-1980 (Mardan)	19-08-2017	19-08-2017	03 Direct	Mail CP Mardan	maintain according to the date of regular appointment
4	Aftaulah S/O Wamshed (FA)	01-04-1991 (Mardan)	19-08-2017	19-08-2017	03 Direct	Cook at CP Mardan	well as the date of acquisition
5	Abid Ali S/O Sar Zamin (DAE)	04-04-1990 (Mardan)	24-08-2017	24-08-2017	03 Direct	Cook at CP Mardan	HSSC however HSSC by title BPS No 103 II
6	Arif Khan S/O Khalifa Rahman (FA acquired on 21/09/2021)	10-01-1997 (Mardan)	24-08-2017	24-08-2017	03 Direct	Sweeper at CP Mardan	(Mulla Nasir Khan Ashraf & others are all traceable from 2009 onwards)
7	Khalid Khan S/O Mir Karam (BA)	10-01-1987 (Mardan)	25-08-2017	25-08-2017	03 Direct	Cook at CP Mardan	Senior official
8	Sajid Khan S/O Sarwar Khan (BA)	19-07-1977 (Mardan)	26-08-2017	26-08-2017	03 Direct	Cook at CP Mardan	Senior official
9	Shah Zaman S/O Abdul Rehman (MA)	03-11-1985 (Mardan)	26-08-2017	26-08-2017	03 Direct	Cook at CP Mardan	Senior official
10	Irfanullah S/O Saad Ullah (DBA)	22-01-1993 (Mardan)	26-08-2017	26-08-2017	03 Direct	Sweeper CP Mardan	Senior official
11	Sartar Khan S/O Amir Zada (FA)	01-01-1994 (Mardan)	26-08-2017	26-08-2017	03 Direct	Cook at CP Mardan	Senior official
12	Abdul Samad S/O Toppersan (FA acquired on 02/08/2015)	17-03-1994 (Mardan)	26-08-2017	26-08-2017	03 Direct	Mail at CP Mardan	Senior official
13	Jehad Ali S/O Bakht Mohammed (BA acquired on 21/09/2021)	05-01-1993 (Mardan)	28-08-2017	28-08-2017	03 Direct	Mail at CP Mardan	Senior official
14	Shah Malik S/O Shah Muhammad (FA acquired on 21/12/2016)	01-08-1995 (Mardan)	28-08-2017	28-08-2017	03 Direct	Sweeper at CP Mardan	Senior official
15	Javed Aslam S/O Aslam Khan (FA acquired on 12/11/2021)	20-03-1974 (Karak)	08-12-2017	08-12-2017	03 Direct	Mail at CP Karak	Senior official
16	Muhammad Saad Khan S/O Muhammad Yaseen Khan (DAE acquired on 13-02-2018)	10-09-1995 (Bannu)	11-12-2017	11-12-2017	03 Direct	Sweeper at CP Bannu	Senior official
17	Muhammad Adil S/O Habib Ur Rehman (FA)	10-09-1990 (Mardan)	24-08-2018	24-08-2018	04 Indirect	Photo Stat Machine Operator at Central Prison Mardan	Senior official
18	Aslam Yar S/O Saibzada (BA)	04-04-1987 (Mardan)	01-09-2018	01-09-2018	03 Indirect	Dhobi at CP Mardan	Senior official

RESTRICTED

Assistant Director
 For Inspector General of Prisons
 Khyber Pakhtunkhwa Rest

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			
Abdullah S/O Muhammad Inam (F.A)	18-02-1990 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan	from the date of acquiring of HSSC and from the date of regular appointment
Aamir Khan S/O Habib Ur Rehman (F.A)	02-04-1993 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan	
Muhammad Basit Ali S/O Fazal Ur Rehman (F.A)	15-03-1998 (Mardan)	01-09-2018	01-09-2018	03	Direct	Attendant at CP Mardan	
Alib Ali S/O Amin Gul (M.com)	06-06-1996 (Mardan)	01-09-2018	01-09-2018	03	Direct	Plumber at CP Mardan	
Neeraj D/O Muhammad Said (F.A)	02-02-2000 (Mardan)	01-09-2018	01-09-2018	03	Direct	F.M Attendant at CP Mardan	
Muhammad Usman S/O Zafran Khan (M.A)	23-04-1987 (Lakki Marwat)	28-12-2018	28-12-2018	03	Direct	Sweeper DJ Lakki Marwat	
M. Adeel Khan 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	
Dolat Khan S/O Karim Baz (SSC acquired in 2020) (F.A acquired on 29-02-2022)	08-03-1984 (Mardan)	04-04-2016	04-04-2016	03	Direct	Sweeper at CP Mardan	
Zabeeh Ullah S/O Gulmat (HSSC & DIT)	04-10-1996 (D.I Khan)	13-03-2020	13-03-2020	03	Direct	Sweeper at CP D.I Khan	
Ahsar Ullah S/O Bakht Ali Khan (FA)	25-03-1989 (Bannu)	07-05-2020	07-05-2020	03	Direct	Baker at C.P Bannu	
Faraz Ali S/O Mehmod Ali (B.A & DIT)	12-03-1994 (Bannu)	07-05-2020	07-05-2020	03	Direct	Dhobi at CP Bannu	
Faaz Muhammad S/O Zar Muhammad (F.A) (SSC acquired in 2020)	01-01-1983 (Mardan)	04-08-2017	04-08-2017	03	Direct	Sweeper at C.P Mardan	
Shahzad Ullah S/O Gul Raees Khan (FA)	01-01-2000 (Bannu)	07-05-2020	07-05-2020	03	Direct	Dhobi at C.P Bannu	
Muhammad Saqib S/O Muhd. Nawaz (DAE / MA)	20-01-1988 (D.I Khan)	05-11-2020	05-11-2020	05	Direct	Tube Well Operator at CP D.I.K	
Fabir Ali S/O Sulaman Khan (F.A)	02-07-1997 (Peshawar)	11-11-2020	11-11-2020	05	Direct	Photostat Machine operator (Inspectorate of Prisons)	
Saad Ali S/O Pasham Ali (F.Sc)	01-04-1996 (Kohat)	09-12-2020	09-12-2020	03	Direct	Baker at DJ Kohat	
Abzaifa Khan S/O Zubair Khan (F.A)	10-09-1999 (Kohat)	09-12-2020	09-12-2020	03	Direct	Executioner at DJ Kohat	
Moin Shah S/O Amjad Hussain Shah (DAE / MA)	05-11-1993 (Haripur)	05-01-2021	05-01-2021	03	Direct	Baker at CP Haripur	
Mohd Khan S/O Anayat Ur Rehman (F.A)	15-10-1995 (Swat)	02-02-2021	02-02-2021	03	Direct	Cook at Distt. Jail Swat	
Muhammad S/O Aurangzeb (F.A acquired on 06-06-2023)	01-01-2002 (Swat)	02-02-2021	02-02-2021	03	Direct	Sweeper at Distt. Jail Swat	

Assistant Director
For Inspector General of Prisons,
Khyber Pakhtunkhwa

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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		
Saifuraz Ahmed S/O M. Yousaf (B.A)	03-08-1988 (Abbottabad)	23-02-2021	23-02-2021	03	Direct	Cook at DJ Abbottabad
Imran S/O Fazal Salani (DAE Civil)	03-04-1994 (Charsadda)	19-03-2021	19-03-2021	03	Direct	Plumber at S.J Charsadda
Sadiq ur Rehman S/O Shams ur Rehman (F.Sc)	20-03-1997 (Buner)	27-03-2021	27-03-2021	03	Direct	Baker at Distt. Jail Buner
Saifuraz Ahmad Jan S/O Masood Ahmad Jan (B.A)	26-10-1994 (Peshawar)	08-04-2021	08-04-2021	05	Direct	Photostat Machine Operator at CP Peshawar
Parbhat S/O Tara Chand (FA acquired on 12-02-2023)	28-09-1995 (Peshawar)	09-04-2021	09-04-2021	03	Direct	Sweeper at I.G of Prisons
Muhammad Altaf S/O Gul Nawaz (F.A)	16-02-1991 (D.I Khan)	05-05-2021	05-05-2021	03	Direct	Baker at CP D.I Khan
Muht Farooq S/O Sheikh Mushtaq (F.A)	03-01-1999 (D.I Khan)	05-05-2021	05-05-2021	03	Direct	Drummer at C.P D.I Khan
Abdul Samad S/O Shafi Ullah (DAE Civil)	01-01-2001 (D.I Khan)	06-05-2021	06-05-2021	03	Direct	Waiter at C.P D.I Khan
Mr. Asmat Ullah S/O Iqbal Hussain (F.A)	10-01-1996 (D.I Khan)	26-05-2021	26-05-2021	03	Direct	Baker at C.P D.I Khan
Basharat S/O Shamsur Rahman (FA)	08-08-1997 (Battagram)	26-05-2021	26-05-2021	03	Direct	Sweeper at S.J Battagram
Imran Naseem S/O Muht Naseem (FSc)	13-01-2000 (Battagram)	26-05-2021	26-05-2021	03	Direct	Mali at S.J Battagram
Asmat Ullah S/O Muht Hashim (B.A)	01-04-1999 (D.I Khan)	01-06-2021	01-06-2021	03	Direct	Baker at C.P D.I Khan
Naveed Ahmad Khan S/O Bashir Ahmad (B.A & DIT)	26-04-1998 (Swat)	04-11-2021	04-11-2021	03	Direct	Waiter at DJ Swat
Muht Sohail Khan S/O Sahar Gul (FSc)	08-01-2000 (Swat)	05-11-2021	05-11-2021	03	Direct	Waiter at DJ Swat
Mammad Khan S/O Haibat Khan (FA)	15-01-2000 (Haripur)	16-11-2021	16-11-2021	03	Direct	Mali at CP Haripur
Kifayatullah S/O Ghulam Bahadar (F.A)	04-08-1996 (Dir Lower)	22-11-2021	22-11-2021	03	Direct	Waiter at DJ Timergara
Zaz Ahmad S/O Jehan Dastagir (FSc)	10-03-1997 (Dir Lower)	22-11-2021	22-11-2021	03	Direct	Waiter at DJ Timergara
Suliman Khan S/O Iqbal (F.A)	14-04-1998 (Dir Lower)	22-11-2021	22-11-2021	03	Direct	Sweeper at DJ Timergara
Zarak Khan S/O Fariddoon Khan (F.A)	26-07-1992 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar
Muht. Ishaq S/O Zakir Ullah (F.A)	20-08-2001 (Peshawar)	17-12-2021	17-12-2021	03	Direct	Naib Qasid at RPO Peshawar

Assistant Director

Inspector General of Prisons
Khyber Pakhtunkhwa Peshawar

B-03

C/O I

NAME OF OFFICIAL WITH ACADEMIC QUALIFICATION	D/O BIRTH WITH DOMICILE DISTRICT	DATE OF FIRST ENTRY INTO SERVICE	APPOINTMENT DATE	REGULAR PROMOTION	METHOD OF PROMOTION	PRESENT APPOINTMENT WITH PLACE OF POSTING	REMARKS
Shahzad Khan S/O Liaqat Ali Khan (F.Sc)	14-07-2001 (Peshawar)	20-12-2021	20-12-2021	03	Direct	Naib Qasid at RPO Peshawar	
Asif Muhammad S/O Faraz Muhammad (DAE Electrical)	09-03-1997 (Karak)	03-01-2022	03-01-2022	03	Direct	Baker at Central Prison Karak	
Shah Nazif Khan S/O Paanda Gul (F.A acquired on 17-01-2009)	04-02-1988 (Malakand)	12-01-2022	12-01-2022	03	Direct	Piper at Sub Jail Malakand	
Sheh Ud Din S/O Muhammad Ismail (F.A acquired on 01-10-2022)	03-08-2002 (Malakand)	12-01-2022	12-01-2022	03	Direct	Piper at Sub Jail Malakand	
Siraj Muhammad S/O Umaid Muhammad (B.A. & DIT) (F.A acquired on 07-08-2013)	02-05-1983 (Dir Lower)	01-02-2022	01-02-2022	03	Direct	Drummer at DJ Timergara	
Sheh Zada S/O Rahim Zada (F.A)	16-03-1991 (Dir Lower)	01-02-2022	01-02-2022	03	Direct	Barber at DJ Timergara	
Miq Ullah S/O Muhammad Yousef Khan (MA)	04-06-1992 (Dir Lower)	01-02-2022	01-02-2022	03	Direct	Baker at DJ Timergara	
Muhammad Shahid Iqbal S/O Taib Gul (Msc)	02-03-1987 (Karak)	11-03-2022	11-03-2022	03	Direct	Mali at Central Prison Karak	
Zeeshan Wahab S/O Abdul Wahab (F.Sc)	17-03-1998 (Karak)	11-03-2022	11-03-2022	03	Direct	Waiter at C.P Karak	
Abdur Rehman S/O Oat Mubhd, Ashraf (FA)	23-12-2000 (L/Marwat)	11-03-2022	11-03-2022	03	Direct	Baker at DJ Larki Marwat	
Usama Zafar S/O Zafar Hayat (DAE Civil)	01-01-2001 (Karak)	11-03-2022	11-03-2022	03	Direct	Sweeper at C.P Karak	
Yasir Ali S/O Jaif Ullah (F.A)	01-04-2001 (Buner)	01-04-2022	01-04-2022	03	Direct	Waiter at District Jail Buner	
Ahraf Ullah S/O Abdul Aziz (F.A acquired on 26-12-2016)	01-02-1984 (Chitral)	27-04-2022	27-04-2022	03	Direct	Waiter at District Jail Chitral	
Bakht Muhammad S/O Nazir Muhammad (M.A)	10-04-1992 (Mardan)	25-05-2022	25-05-2022	03	Direct	Sweeper at CP Mardan	
Marifat Shah S/O Abullah Shah (F.A)	13-02-1987 (Mardan)	26-05-2022	26-05-2022	03	Direct	Waiter at CP Mardan	
Nawaz Khan S/O Shamsad Khan (B.A)	08-04-1987 (Mardan)	26-05-2022	26-05-2022	03	Direct	Sweeper at CP Mardan	
Ahmad Ali S/O Anwar Baig (F.Sc)	20-01-1998 (Mardan)	26-05-2022	26-05-2022	03	Direct	Waiter at CP Mardan	
Muhammad Sadig S/O Muhammad Zaman (F.A)	09-04-1995 (Mardan)	29-05-2022	29-05-2022	03	Direct	Pipe Fitter at CP Mardan	
Inshar Ullah S/O Abdullah Jan (MA)	13-02-1984 (Larki Mwd)	01-06-2022	01-06-2022	03	Direct	Dholi at D.J Larki Marwat	
Insham Iqbal S/O Gul Rehman (B.Sc)	15-03-1999 (Larki Mwd)	01-06-2022	01-06-2022	03	Direct	Waiter at DJ Larki Marwat	

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For Inspector General of Prisons
Director Peshawar District

C/O

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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		
79	Fuzail Ahmad S/O Abdul Qudus Khan (BA)	10-05-1995 (Karak)	03-06-2022	03-06-2022	08	Direct	Baker at Central Prison Karak	
80	Muhammad Shahab S/O Ghani Mughal (F.Sc)	25-04-1994 (Hangu)	10-06-2022	10-06-2022	08	Direct	Dhobi at CP Hangu	
81	Arbab Ahmed S/O Abdul Rehman (F.A)	01-03-1995 (Hangu)	11-06-2022	11-06-2022	08	Direct	Walter at CP Hangu	
82	Adil Khan S/O Kalai Khan (F.Sc)	03-04-1998 (Hangu)	13-06-2022	13-06-2022	08	Direct	Baker at CP Hangu	
83	Zabir Rehman S/O Saad Rehman (MA)	01-02-1990 (Baloch)	15-06-2022	15-06-2022	09	Direct	Barber at S. Khar Baloch	
84	Muhammad Ghani Khan S/O M. Nazir (PA)	25-03-1997 (Peshawar)	08-11-2022	08-11-2022	08	Direct	Executioner at CP Peshawar	
85	Suoman Khan S/O Iqbal Khan (B.A)	01-01-1987 (Peshawar)	10-11-2022	10-11-2022	03	Direct	Sweeper at CP Peshawar	
86	Muhammad Imran Khan S/O Muneer Amin (B.A)	06-03-1983 (Peshawar)	11-11-2022	11-11-2022	03	Direct	Sweeper at CP Peshawar	
87	Imran Ullah S/O Ghayas Ali (F.A)	14-03-1993 (Peshawar)	14-11-2022	14-11-2022	03	Direct	Baker at CP Peshawar	
88	Kamran Khan S/O Mushaf Khan (DAE CIVIL)	26-09-1990 (Kohat)	23-11-2022	23-11-2022	03	Direct	Baker at District Jail Kohat	
89	Nagash S/O Saeed Ahmed Khan (BA)	06-09-1997 (Kohat)	23-11-2022	23-11-2022	03	Direct	Sweeper at District Jail Kohat	
90	Shafiq Ur Rehman S/O Umer Gul (F.Sc)	10-04-1998 (Kohat)	23-11-2022	23-11-2022	03	Direct	Barber at District Jail Kohat	
91	Muhammad Amad S/O Dost Muhammad (F.A)	30-04-1999 (Kohat)	23-11-2022	23-11-2022	03	Direct	Walter at DJ IG Kohat	
92	Umar Farooq S/O Liqat Ali (F.A)	06-04-1995 (Charsadda)	12-12-2022	12-12-2022	05	Direct	Tube well Operator at Sub Jail Charsadda	
93	Abdullah S/O Noor Habib (BA) (F.A acquired on 06-08-2017)	01-04-1999 (Charsadda)	13-12-2022	13-12-2022	03	Direct	Sweeper at S. Charsadda	
94	Muhammad Asim S/O Ayub Khan (F.A) (acquired on 25-07-2012)	24-04-1993 (Charsadda)	14-12-2022	14-12-2022	03	Direct	Naib Qasid at S. Charsadda	
95	Muhammad Iqbal S/O Amir Nawaz (F.Sc)	29-11-1993 (Mardan)	19-12-2022	19-12-2022	04	Direct	Cook at CP Mardan	
96	Mst. Samia Bibi D/O Ghulam Sarwar (MA)	13-03-1994 (Mardan)	23-12-2022	23-12-2022	08	Direct	Attendant at CP Mardan	
97	Zeshan Khan S/O Nisar Khan (BA acquired on 23-07-2016) / BA	01-04-1998 (Swabi)	10-01-2023	10-01-2023	03	Direct	Walter at Sub Jail Swabi	
98	Fayaz Ali S/O Mutam Shah (F.A acquired on 23-07-2016) / BA	25-03-1998 (Swabi)	13-01-2023	13-01-2023	03	Direct	Sweeper at Sub Jail Swabi	

TESTED

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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	BRS METHOD OF APPOINTMENT		
99	Abdul Hameed S/O Aziz Ur Rahman (F.A. acquired on 04-12-2012)	15-02-1989 (Mansehra)	14-01-2023	14-01-2023	03	Direct Baker (Mansehra)	
100	Waqar Ahmad S/O Sarwar Sultan (D.A.E. acquired on 09-01-2014) (BA)	07-08-1999 (Mansehra)	14-01-2023	14-01-2023	03	Direct Waiter at DJ Mansehra	
101	Ummer Shahzad S/O Muhammad Iftikhar (BA / D.Cpn acquired on 13-01-2018)	19-04-1997 (Mansehra)	17-01-2023	17-01-2023	03	Direct Drummer at DJ Mansehra	
102	Muhammad Naseer S/O Muhammad Saleem (F.A. acquired on 27-09-2023)	02-08-2004 (Mansehra)	14-01-2023	14-01-2023	03	Direct Cook at DJ Mansehra	
103	Faheem S/O Abdur Rasheed (F.A. acquired on 03-10-2023)	02-01-1992 (Charsadda)	19-03-2021	19-03-2021	03	Direct Cook at Sub Jail Charsadda	
104	Muhammad Ashfaq Khan S/O Mushfaq Khan (F.A. acquired on 02-02-2024)	19-10-2001 (Peshawar)	07-11-2022	07-11-2022	03	Direct Cook at CP Peshawar	
105	Ishaq Khan S/O Man Gul (F.A. acquired on 03-02-2024)	09-03-1987 (Nowshera)	04-09-2014	04-09-2014	03	Direct Naib Qasid at S.J. Nowshera	

TESTED

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

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GOVERNMENT OF KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATIONS

1. S.O. No. 55/2021 The exercise of the powers conferred by sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, in the supersession of appointments is made in the following manner: In this regard, the Home & Tribal Affairs Department, in consultation with the Establishment Department and the Finance Department hereby lays down the method of supersession, qualifications and other conditions applicable to posts born on the strength of the Inspector of Prisons, Khyber Pakhtunkhwa. A specimen form No. 1 of the attached appendix is appended.

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT

- 1. Sd/- No. and Date even. Copy forwarded to:-
- 2. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
- 3. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Peshawar.
- 4. The Secretary to Government of Khyber Pakhtunkhwa, Law & Parliamentary Affairs Department, Peshawar.
- 5. The Secretary to Government of Khyber Pakhtunkhwa, Health Department, Peshawar.
- 6. The Secretary to Government of Khyber Pakhtunkhwa, P & S Department, Peshawar.
- 7. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
- 8. The Manager, Government Printing Press, Peshawar for publication in the Government Gazette. He is further requested to send part (10) copies of the said Gazette Notification to the Law Department as well as Home and Prisons Departments for record.
- 9. Sd/- Home Secretary, Khyber Pakhtunkhwa.

DEPUTY SECRETARY (P&S)
Home and Tribal Affairs Department



APPENDIX

UPPER EXECUTIVE STAFF

SOCIAL NO.	NOMENCLATURE OF POST	MINIMUM QUALIFICATION FOR APPOINTMENT BY DIRECT RECRUITMENT OR BY TRANSFER	MINIMUM QUALIFICATION FOR PROMOTION	METHOD OF RECRUITMENT
1.	Inspector General Prisons (BPS-20)			By promotion on the basis of selection on merit from amongst the holders of the posts of Deputy Inspector General of Prisons, Commandants and Superintendents Central Prisons with at least seven years service in BPS-17 and above, who have successfully completed Senior Management Course. Provided that if no suitable officer is available for promotion then by transfer from PAS/FMS Officers. Note: For the purpose of promotion to the post of Inspector General of Prisons, a joint seniority list of Deputy Inspector General of Prisons, Commandants, and Superintendents Central Prisons shall be maintained.
2.	Deputy Inspector General Prisons/Commandant Superintendents Central Prisons (BPS-19)			By promotion on the basis of seniority cum fitness from amongst the holders of the posts of the Assistant Inspector General Prisons, Deputy Commandants and Superintendents District Prisons with at least twelve (12) years service in BPS-17 and above, who have passed departmental examination on presentation of Superintendent (Class II). Provided that if no suitable officer is available for promotion then by transfer from amongst PAS/FMS Officers. Note: For the purpose of promotion to the posts of Deputy Inspector General of Prisons, Commandants and Superintendents Central Prisons, a joint seniority list of Assistant Inspectors General Prisons, Deputy Commandants and Superintendents District Prisons shall be maintained.

To

The Inspector General of Prison
Khyber Pakhtunkhwa, Peshawar

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER VIDE DATED 27/05/2024.
Prayer

On acceptance of the instant appeal the revised seniority list of Class IV dated 27/05/2024 may please be modified and include the names of the appellants namely 1. Gul Muhammad Said. 2. Farman Abbas in the joint seniority list of Class IV.

Respected Sir:

1. That the names of the appellant were included in the tentative seniority list of Class IV for promotion prepared on dated 05/02/2024 but now due to order dated 27/05/2024, the names of the appellants have been removed from the joint seniority list of Class IV, while the appellant namely Gul Muhammad Said was appointed on 26/08/2017 and was included at the serial No. 9 of the tentative seniority list of Class IV, while appellant namely Farman Abbas appointed on 26/08/2017 was included in tentative seniority list of Class IV at serial No. 13, but both the appellants were excluded from the seniority list on the impugned order vide dated 27/05/2024 due to reason of 3rd Divisioner and 2nd Divisioner.

2. That according to the rules of 2021, column No. 37, the qualification for promotion is matriculation and even no division in the education documents has been prescribed in the serial No. 4 of column No. 37.

3. That the appellants are qualified upto F.A and they are eligible to be included in the seniority list for promotion.

4. That feeling aggrieved from the impugned order of revised joint seniority list dated 27/05/2024 approaches to this forum on the following grounds, inter alia:

REASONS:

A. That the appellants names were included in the tentative seniority list of Class IV on dated 01/01/2024 and both the appellants were at serial No. 9 & 13 respectively.

B. That according to that tentative list, both the appellants were entitled to be included in the joint seniority list of Class IV.

C. That order dated 27/05/2024 is against the service rules No. SO(P&R)/1-33/2021, notified on dated: 15/04/2022

D. That appellants are qualified upto F.A, therefore, they are entitled under the rule mentioned above to be included in the joint seniority list of Class IV for promotion.

E. That even division or marks obtained in the educational career has not been mentioned in the aforementioned rules.

F. That any other ground which is not specifically mentioned the appellants will be at liberty to take the same whenever necessary.

It is, therefore, most humbly prayed that the appellants names may please be included in the joint seniority list of Class IV for promotion. *Sanabing me*
To claim antedated promotion.

dated 10-06-2024




APPELLANTS

Farman Abbas

S/o Musharaf Khan

CNIC No: 16102-0604847-1

10/06/2024

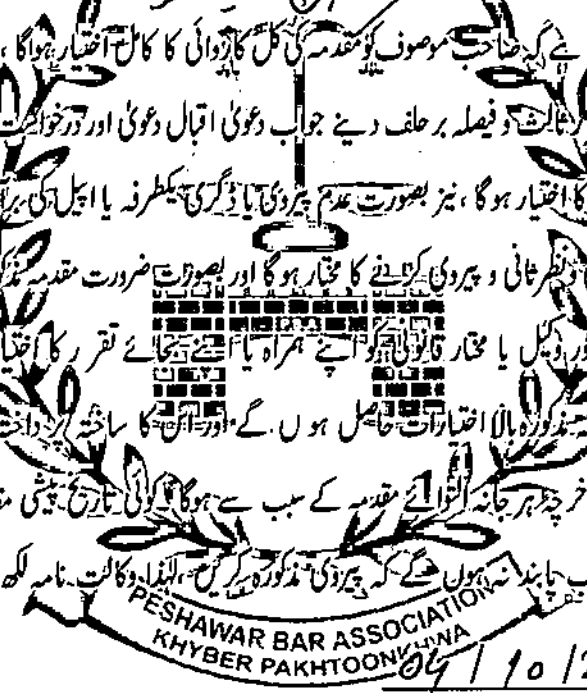
51230	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ: 	PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر: 050003	
رابطہ نمبر: 0302 8860153	

بعدالت جناب: محترم جسٹس نوری علی صاحب

منجانب: <u>ایڈوائزر</u>	دعویٰ: <u>محترم جسٹس نوری علی</u>
	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____
بابت تحریر آنکہ	


مرزاں عباس سکھنام اسی جی صریح طور پر

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام محکمہ عدلیہ کے لیے محرم 10 / 10 / 2024 کو دیکھ کر مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختتام ہوگا، نیز دیکھ صاحب کو راضی نامہ کرنے و تقریر نمائندگی و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست سے ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاخیر یا کسی طرفہ یا اپیل کی برائگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور دیکھ یا مختار قانون کو اپنے ہمراہ یا اپنے ججائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جگہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ اثنائے مقدمہ کے سبب سے ہوگا اس کی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو دیکھ صاحب چاہندے ہوں گے کہ پیروی مذکورہ کے لیے الزام و کالت نامہ لکھ دیا تاکہ سند رہے



المرقوم: 04 / 10 / 2024

الع بد واه شد الع بد
مقام محکمہ عدلیہ کے لیے منظور ہے۔

Accepted & Signed


مقام: محکمہ عدلیہ سول سروس
محرم 10 / 10 / 2024