

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
AT CAMP COURT ABBOTTABAD.

Service Appeal No. 1129/2018

Date of Institution ... 10.09.2018

Date of Decision ... 20.02.2019

Syed Abdul Wajid, Principal Government Post Graduate College, Mansehra.  
... (Appellant)

VERSUS

Govt: of Khyber Pakhtunkhwa through Secretary Higher Education, Khyber  
Pakhtunkhwa Peshawar and four others. ... (Respondents)

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MR. MUHAMMAD ARSHAD KHAN TANOLI,  
Advocate

--- For appellant.

MR. MUHAMMAD BILAL,  
Deputy District Attorney

--- For official respondents

MR. ABDUL SABOOR KHAN,  
Advocate

--- For private respondent  
no.5.

MR. AHMAD HASSAN,  
MR. MUHAMMAD AMIN KHAN KUNDI

--- MEMBER(Executive)  
--- MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the  
parties heard and record perused.

ARGUMENTS

2. Learned counsel for the appellant argued that he was posted as Principal Govt:  
Post Graduate College, Mansehra vide notification dated 18.11.2016. When the  
appellant refused to budge before the pressure exerted by respondent no.4 in connection  
with some appointments in the said college, hence, penalized for making appointments  
on merit through impugned notification dated 28.02.2018, whereby he was posted as

Professor in the same college. The appellant moved Peshawar High Court through writ petition no. 264-A/2018, which was dismissed for want of jurisdiction. Thereafter he filed departmental appeal on 04.04.2011 which has not yet been decided, hence, the instant service appeal. Learned counsel for the appellant vehemently contested that an officer junior to the appellant has been posted as Principal which is against the prevailing law and rules.

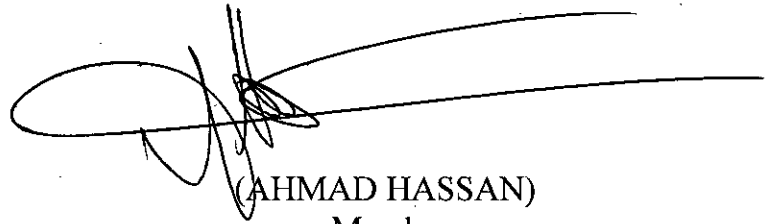
3. Learned counsel for private respondent no.5 argued that present appeal being barred by time is not maintainable. The appellant has already completed the normal tenure of posting. Under Section-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 a government servant is bound to serve anywhere in the province. Private respondent no.5 is in officer of BPS-20 and fully eligible to hold the post of Principal.

4. Learned Deputy District Attorney relied on arguments advanced by the learned counsel for private respondent no.5.

#### CONCLUSION.

5. Before proceedings further, we would like to first touch the issue of limitation so as to ascertain whether the present service appeal is hit by limitation or otherwise? It is pointed out that impugned order was issued on 28.02.2018, whereas departmental appeal was preferred by the appellant on 04.04.2018, as such the departmental appeal is barred by time. On the other hand service appeal was filed on 10.09.2018 is also time barred. No plausible explanation for delay in submission of departmental/service appeal is given in the application for condonation of delay. As the case is hit by limitation so we would not like to touch the merits of the case. It is liable to be dismissed..

6. As a sequel to above, the appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



(AHMAD HASSAN)  
Member  
Camp Court Abbottabad.

  
(MUHAMMAD AMIN KHAN KUNDI)  
Member

ANNOUNCED  
20.02.2019

19.02.2019

Counsel for the appellant present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Khushi Muhammad, Section Officer (Litigation) for official respondents No. 1 to 4 present. Mr. Abdul Saboor Khan, advocate on behalf of private respondent No. 5 also present and submitted Vakalat Nama. The same is placed on record. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for rejoinder and arguments on tomorrow i.e 20.02.2019 before D.B at Camp Court Abbottabad.



(Ahmad Hassan)  
Member  
Camp Court Abbottabad

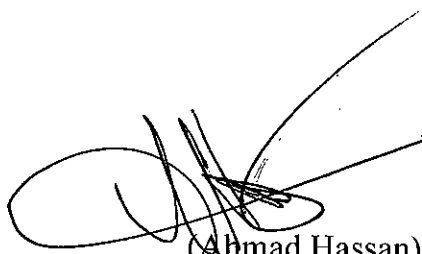


(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad


**ORDER**

20.02.2019 Counsel for the appellant present. Mr. Muhammad Bilal, Deputy District Attorney alongwith M/S Khushi Muhammad, Section Officer (Litigation), Muhammad Irfan, AD (Lit) for official respondents no. 1 to 4 and private respondent no.5 with counsel present. Arguments heard and record perused.

Vide our detailed judgment of today placed on file, the appeal is dismissed. In the circumstances, parties are left to bear their own costs. File be consigned to the record room.



(Ahmad Hassan)  
Member  
Camp Court Abbottabad


  
(M. Amin Khan Kundi)  
Member

**ANNOUNCED**  
20.02.2019

1129/18

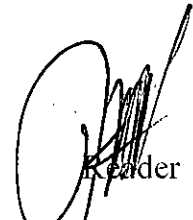
18.10.2018

Appellant Abdul Majid in person alongwith his counsel Mr. Muhammad Arshad Tanoli, Advocate present. Mr. Khushi Muhammad, S.O(E&SE) alongwith Mr. Usman Ghani, District Attorney for the respondents present. Respondent No. 5 (Ghulam Mustafa) is not in attendance. He be summoned through fresh notice for the next date. Case to come up for written reply/comments on 12.11.2018 before S.B at camp court, Abbottabad. In the meanwhile operation of the impugned order/notification dated 28.2.2018 shall remain suspended but to the extent of present appellant (at S.No. 22) till the date fixed.

  
Chairman  
Camp Court, A/Abad

12.11.2018

. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 16.01.2019 at camp court Abbottabad.

  
Member  
A/Abad

16.01.2019

Abul Saboor Advocate present and submitted wakalat nama in favor of appellant. Mr. Muhammad Bilal learned Deputy District Attorney alongwith Ameer Muhammad ADO for the respondents present. Representative of the respondent department submitted written reply/comments. Adjourn. To come up for rejoinder/arguments on 19.02.2019 D.B at Camp Court Abbottabad.

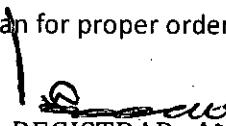

  
Member

Camp Court Abbottabad

Form- A  
FORM OF ORDER SHEET

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

Case No. 1129/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/09/2018	<p>The appeal of Syed Abdul Wajid presented today by Mr. Ansar Hayat Abbasi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 10/9/18</p>
2-	10-9-18.	<p>This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>18-9-18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>


18.09.2018 Appellant with counsel present. Preliminary arguments heard.

The appellant has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order dated 12.02.2018 whereby the appellant was transferred from the post of Principal GPGC Mansehra and adjusted in the same college as Professor.

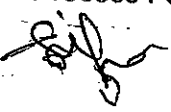
Learned counsel for the appellant argued inter alia that appellant while performing his duties as Principal GPGC Mansehra completed the recruitment process of Sweeper and Hostel Bearer strictly on merit; that Personal Assistant to Minister Higher Education Khyber Pakhtunkhwa (respondent No.4) sent messages to the appellant to appoint his recommendee for the post of Hostel Bearer, who could not qualify the merit, however the appellant issued order of appointment of deserving candidates. Resultantly junior colleague of the appellant was appointed to the post of Principal GPGC Mansehra vide the impugned order which order is apparently illegal, void and based on malafide.

Points raised need consideration. The present service appeal is admitted for regular hearing subject to all the legal objections including the issue of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 18.10.2018 before S.B at Camp Court A/Abad.

Annexed with the main appeal is an application for interim relief. Notice of the said application be also issued to the respondents for the date fixed. In the meanwhile operation of the impugned order dated 28.02.2018 shall remain suspended till the next date fixed as 18.10.2018.

  
Member  
Camp Court A/Abad

Appellant Deposited  
Security & Process Fee



**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal. No. 1129 /2018

Syed Abdul Wajid, Principal Govt. Post Graduate College, Mansehra.

...APPELLANT

**VERSUS**

Government of KPK through Secretary Higher Education, KPK, Peshawar  
& others.

...RESPONDENTS

**SERVICE APPEAL**

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...APPELLANT

Dated: 10/09 /2018

Through

  
(Ansar Hayat Abbasi)

&

  
(Muhammad Asjad Pervez Abbasi)  
Advocates High Court, Abbottabad



**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 1129 /2018

Diary No. 1422

Dated 10/9/2018

Syed Abdul Wajid, Principal Government. Post Graduate College, Mansehra.

-----(*Appellant*)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education Department, Khyber Pakhtunkhwa Peshawar.
3. Chief Secretary Khyber Pakhtunkhwa Peshawar R/o Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
4. Personal Assistant to Minister for High Education, Khyber Pakhtunkhwa Peshawar.
5. Ghulam Mustafa, Professor Pakistan Studies, Government Post Graduate College Mansehra.

**Filed to-day**

*R. W.*  
Registrar

10/9/18

-----(*Respondents*).

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 FOR ISSUANCE OF DIRECTION TO THE EFFECT THAT THE ADJUSTMENT OF APPELLANT FROM THE POST OF PRINCIPAL GOVERNMENT POST GRADUATE COLLEGE, MANSEHRA TO THE POST OF PROFESSOR OF GOVERNMENT POST GRADUATE COLLEGE, MANSEHRA AND THE ADJUSTMENT

OF RESPONDENT NO.5 AS PRINCIPAL AT THE PLACE OF APPELLANT IN GOVT. POST GRADUATE COLLEGE, MANSEHRA IS ARBITRARY, FANCIFUL, MALAFIDE AND WITHOUT LAWFUL AUTHORITY HENCE LIABLE TO BE STRUCK DOWN.

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**PRAYER:** ON ACCEPTANCE OF INSTANT APPEAL THE IMPUGNED NOTIFICATION MAY KINDLY BE DECLARED AS NULL AND VOID AND TO HAVE BEEN PASSED WITHOUT LAWFUL AUTHORITY HAVING NO EFFECT ON THE RIGHT OF THE APPELLANT. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEM FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE, MAY ALSO BE GIVEN TO THE APPELLANT.

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Respectfully Sheweth;-

Brief Facts of the case are as under:-

1. That, the appellant qualified M.Sc in Chemistry in 1986 who was appointed as a Lecturer in Grade-17 and was promoted in Grade-20 on 21/11/2014.

Copy of notification dated 21/11/2014 is annexed as Annexure "A".

2. That, the appellant was posted as Head of Chemistry Department from 2010 to 16/09/2016, who devotedly discharged his duties. The appellant was subsequently posted as Vice Principal at Government Post Graduate College, Mansehra and he served as a Vice Principal from 2013 to 2016 as well.
  
3. That, on the retirement of the Principal Govt. Post Graduate College, Mansehra the seat of Principal fell vacant and the appellant who was the most Senior Professor in grade-20 was recommended by the outgoing Principal and after his retirement, the appellant was posted as Principal Govt. Post Graduate College, Mansehra against the vacant post vide notification No.SO(E-I)E&AD/9-88/2016 dated 18/11/2016 on merit on the basis of seniority. Copy of notification dated 18/11/2016 is annexed as Annexure "B".

4. That, That, two posts of sweeper and hostel bearer, Class-IVs became vacant at Govt. Post Graduate College, Mansehra. The Director Higher Education issued directions to fill-up vacant posts with immediate effect on merit basis. A committee was constituted for the appointment of above noted seats consisting of the appellant, Professor Riaz Hussain and Muneer Ahmed Deputy Director (Nominee of HED). During the scrutiny, the committee found Muhammad Adil and Tanveer, eligible for the said posts of Hostel bearer and sweeper. Adil is the son of retired class-IV of this institution who retired as Hostel Bearer hence, on the basis of 25% quota, he was appointed against the said post. Respondent No.4 sent diverse messages to appoint his recommendee ignoring the merit policy in respect of Muhammad Nazir for the post of Hostel bearer who could not qualify the merit in scoring and as such, the request of respondent No.4 was turned down. The appellant passed an order of the appointment of deserving candidates. Copies of minutes of the committee, the scoring marks and the appointment orders are attached as Annexure "C", "D" & "E" respectively.

5. That, a tentative seniority list of Professor (BPS-20) college cadre was issued upto 31/01/2016 and the appellant was shown at serial No.112 whereas respondent No.5 was shown at serial No.137 of the said seniority list. As per seniority list, the appellant was the senior most Professor in the college, was entitled to be adjusted/posted against the post of Principal. Copy of seniority list is attached as Annexure "F".
  
6. That, respondent No.4 moved a summary for the demotion of the appellant from the post of Principal Govt. Post Graduate College, Mansehra to the post of Professor. A notification was issued on 28/02/2018 whereby the appellant was posted as a Professor at Govt. Post Graduate College, Mansehra whereby respondent No.5, Professor Govt. Post Graduate College, Mansehra was adjusted as Principal of Govt. Post Graduate College, Mansehra at the place of appellant. Copy of notification is annexed as Annexure "G".

7. That the appellant feeling aggrieved from the above notification dated 28/02/2018, initially assailed the same before the Honourable Peshawar High Court, Bench Abbottabad through writ petition No.264-A of 2018, which was dismissed in limine for want of jurisdiction with the direction to approach the proper forum. Attested Copy of writ petition No.264-A/2018 and judgment dated 28/03/2018 is annexed as Annexure "H".

8. That thereafter, the appellant on 04/04/2018 filed the departmental appeal before the competent authority which has not been decided as yet despite the lapse of statutory period of the same. Copy of departmental appeal and receipts of registry are attached as Annexure "I".

Feeling aggrieved from the impugned order notification dated 28/02/2018 and later on from the inaction of the departmental authority upon the departmental appeal, appellant has plunged to the Honourable Court under Section 4 of Service Tribunal Act 1974 for the redressal of his grievance, inter-alia amongst many other;-

**GROUND:**

- a) That the impugned order/notification is illegal, perverse, unlawful, capricious, unilateral, ultra-vires, arbitrary, despotic, against the norms of rules, policy and settled principle of law hence not tenable at law.
  
- b) That the impugned order was passed on the back of appellant without affording him any opportunity of being heard, to the sheer detriment of appellant without assigning any cogent and plausible justification, which is not maintainable in the eyes of law.
  
- c) That it is less understandable indeed incomprehensible that how seniority of the appellant has been ignored and a junior from appellant has been appointed in the wake of adjustment on the slot of principal of Post Graduated College, Mansehra.

- d) That by no stretch of imagination the impugned order is reasonable order rather clearly reflects that same is result of political victimization as the appellant could not obey the illegal and unlawful desires of the high-ups.
  
- e) That it is settled principle of law that all posting/transfer and adjustment shall strictly be made in accordance with law, rules, policy and in the public interest and shall not be abused/misused to victimize the Government Servant.
  
- f) That the Government has decided to adopt the adjustment and placement policy as all the adjustment would be made on the basis of merit.
  
- g) That it is also ironclad principle of law that seniority in service, cadre or post to which a civil servant is appointed, shall take effect



from the date of regular appointment to the service.

- h) That minute of meeting made by the Directorate of Higher Education KPK January 04, 2017 goes on saying that the principals are appointed on the basis of seniority. Copy of minutes of meeting dated 04/01/2017 is attached as Annexure "J".
- i) That news clipping in connection with the illegal activities of the helm of affair is also attached for worth perusal.
- j) That, the order of adjustment of appellant from the Post of Principal Govt. Post Graduate College, Mansehra to the post of Professor and the adjustment of respondent No.5 to the post of Principal Govt. Post Graduate College, Mansehra is against the facts, law and all settled principles followed since long.

- k) That, the appellant is the most senior professor according to the seniority list and being entitled was adjusted as a Principal but his demotion from the post of Principal in an arbitrary manner is quite alien to law.
- l) That, there is a consistent practice that the senior most Professors will be posted against the post of Principal and appellant was accordingly adjusted/posted against the said post of principal. According to policy of Higher Education Department, Senior most Professor in BPS-20 having qualities of leading the faculty, shall be considered for such an important post. The appellant was sent for such training i.e training of Leadership and Management at LUMS, Lahore in December, 2017 through Higher Education Department, KPK.
- m) That, respondent No.4, who had approached the appellant for the appointment of his nominee had nourished a grudge against the

appellant and on account of his blessings, the notification was issued vide which the appellant was removed from the post of Principal and a junior most Professor was adjusted against the appellant at the post of Principal.

- n) That, the involvement of respondent No.4 in the internal affairs of College tantamount to sheer malafide which led to the demotion/removal of appellant from the post of Principal.
- o) That there is no other efficacious and adequate remedy available to the appellant, except the present appeal.
- p) That other points shall be raised before the Honourable Tribunal at the time of arguments.

It is, therefore, humbly prayed that on acceptance of instant appeal the impugned notification may kindly

be declared as null and void and to have been passed without lawful authority having no effect on the right of the appellant. Any other relief which this Honourable Court deem fit and proper in the circumstances of the case, may also be given to the appellant.

  
...APPELLANT

Dated: 10/09 /2018

Through

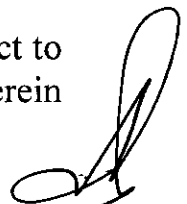
  
(Ansar Hayat Abbasi)

&

  
(Muhammad Asjad Pervez Abbasi)  
Advocates High Court, Abbottabad

**VERIFICATION:-**

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

  
...APPELLANT

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal. No. \_\_\_\_\_/20181

Syed Abdul Wajid, Principal Govt. Post Graduate College, Mansehra.

**...APPELLANT**

**VERSUS**

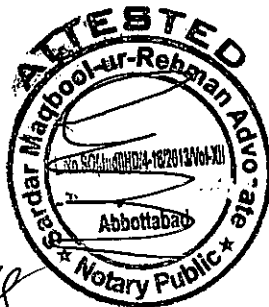
Government of KPK through Secretary Higher Education, KPK, Peshawar  
& others.

**...RESPONDENTS**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Syed Abdul Wajid, Principal Govt. Post Graduate College, Mansehra, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



**DEPONENT**

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal. No. \_\_\_\_\_/2018

Syed Abdul Wajid, Principal Govt. Post Graduate College, Mansehra.

**...APPELLANT**

**VERSUS**

Government of KPK through Secretary Higher Education, KPK, Peshawar  
& others.

**...RESPONDENTS**

**SERVICE APPEAL**

**APPLICATION FOR SUSPENSION OF  
NOTIFICATION NO.SO(E-I)E&AD/9-88/2017 DATED  
28/02/2018.**

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Respectfully Sheweth;-

1. That the instant appeal is being filed before this Honourable Tribunal.
2. That the instant application may kindly be treated as integral part of service appeal.

3. That, if the notification No.SO(E-I)E&AD/9-88/2017 dated 28/02/2018 is not suspended/stayed the appellant will suffer irreparable loss of his services in the department.
4. That balance of convenience lies in favour of the appellant. Besides, the appellant has brought a good prima facie case before this Honourable Tribunal.

It is, therefore, humbly prayed that on acceptance of the instant application, notification No.SO(E-I)E&AD/9-88/2017 dated 28/02/2018 may graciously be suspended and status quo may also be ordered to be maintained till final disposal of the main service appeal.

  
...APPELLANT

Through

Dated: 10 / 09 /2018

  
(Ansar Hayat Abbasi)

&

  
(Muhammad Asjad Pervez Abbasi)  
Advocates High Court, Abbottabad

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal. No. \_\_\_\_\_/2018

Syed Abdul Wajid, Principal Govt. Post Graduate College, Mansehra.

**...APPELALLANT**

**VERSUS**

Government of KPK through Secretary Higher Education, KPK, Peshawar  
& others.

**...RESPONDENTS**

**SERVICE APPEAL**

**APPLICATION FOR CONDONATION OF DELAY.**

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Respectfully Sheweth;-

1. That the instant appeal is being filed before this Honourable Tribunal and the instant application may kindly be treated as integral part of service appeal.
2. That, delay if it all is due to the mis-presentation and fraud of the departmental authority as they kept appellant to believe through their representative that your departmental appeal will be accepted, even after the lapse of 90 days.




3. That till date they are procrastinating the appellant with the same, however, the appellant finally manage to challenge the impugned notification before this Honourable Court.
4. That delay occurred is purely related to the malafide of the departmental authority, which can be condoned in the supreme interest of the justice as it is consistence view of the superior courts that cases should be decided on merit rather than the technicalities.
5. That other points shall be raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant application, the time lapsed may graciously be ordered to be condoned.

...APPELLANT

Dated: 10/09 /2018

Through

  
(Ansar Hayat Abbasi)

&

  
(Muhammad Asjad Pervez Abbasi)  
Advocates High Court, Abbottabad



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

Amir  
18

Dated Peshawar, the November 21, 2014

NOTIFICATION.

NO.SO(E-I)E&AD/9-88/2014. The competent authority, on the recommendations of the Provincial Selection Board, is pleased to promote the following Male Associate Professors (BS-19) of Higher Education Department to the post of Professor (BS-20), on regular basis, with immediate effect:-

S. #.	NAME OF OFFICER
1.	Mr. Mir.Ghulam Khan
2.	Mr. Roshmali Khan
3.	Mr. Rahmat Karim
4.	Mr. Nowsherawan
5.	Mr. Muhammad Anwarul Haq
6.	Mr. Sher Bahadar Khan
7.	Mr. Abdul Hadi
8.	Mr. Inayat ur Rehman
9.	Mr. Izhar-ul-Haq
10.	Mr. Hidayat Ullah
11.	Syed Abdul Wajid
12.	Mr. Sajjad Samad
13.	Syed Zulfiqar Haider
✓ 14.	Mr. Sajjad Ali Khan
15.	Mr. Rahmat Ullah
16.	Mr. Muhammad Saddiq
17.	Mr. Abdul Jabbar
18.	Mr. Falak Naz Khan
19.	Syed Iltaf Haider
20.	Mr. Rahmat Ali
21.	Mr. Irshad Ahmad
22.	Muhammad Tariq Saddique
23.	Mr. Nasrullah Khan
24.	Mr. Ghulam Rasool
25.	Mr. Muhammad Zubair
26.	Mr. Muhammad Ayub
27.	Mr. Shah Nawaz Khan
28.	Mr. Nisar Ahmad
29.	Mr. Abdul Majid

Attested  
10/19/2014

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973-read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 the Professors on their promotion shall be on probation for a period of one year.

3. Consequent upon the above, the following adjustments are made:-

S. #	NAME OF OFFICER	FROM	TO
1.	Mr. Mir Ghulam Khan (BS-20)	Associate Professor of Biology (BPS-19) Govt; Postgraduate College, Kohat.	Professor (BPS-20) Govt; Degree College, KDA Kohat, against vacant post
2.	Mr. Roshmali Khan (BS-20)	Associate Professor of Mathematics, Government Postgraduate College Karak	Professor (BPS-20) Govt; Degree College, Hangu, against vacant post.



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

PAGE-2

S. #	NAME OF OFFICER	FROM	TO
3.	Mr. Rahmat Karim, (BS-20)	Associate Professor of Statistics (BPS-19) Govt; Postgraduate College, Timergara.	Professor (BPS-20) / Principal, Govt; Postgraduate College, Warai (Dir Upper); against vacant post.
4.	Mr. Nowsherawan (BS-20)	Associate Professor of Chemistry (BPS-19) Govt; Degree College, Kabal (Swat).	Professor (BPS-20) / Principal, Govt; Degree College, Daggar (Buner); against vacant post.
5.	Mr. Muhammad Anwarul Haq (BS-20)	Associate Professor of English (BPS-19) Govt; Degree College, No.2 Mardan.	Professor (BPS-20) / Principal Govt; Degree College, Dir Upper; against vacant post.
6.	Mr. Sher Bahadar Khan (BS-20)	Associate Professor of Statistics (BPS-19) / Principal, Govt; Degree College, Khan Kohi (Nowshera).	Professor (BPS-20) / Principal, Govt; Degree College, Khan Kohi (Nowshera); against personal upgraded post of Principal BS-19 to BS-20.
7.	Mr. Abdul Hadi (BS-20)	Associate Professor of English (BPS-19) Govt; Postgraduate College, Timargara (Dir Lower)	Professor (BPS-20) Govt; Degree College, Thana Malakand, against vacant post.
8.	Mr. Inayat ur Rehman (BS-20)	Associate Professor of Islamiyat (BPS-19) Govt; Postgraduate College, Mardan.	Professor (BPS-20) Govt; Postgraduate College, Dargai (Malakand); against vacant post.
9.	Mr. Izhar-ul-Haq (BS-20)	Associate Professor of Arabic / Islamiyat (BPS- 19) Govt; Degree College, Lahor (Swabi).	Professor (BPS-20) / Principal Govt; Degree College, Lahor (Swabi), vice Sr. No. 34.
10.	Mr. Hidayat Ullah (BS-20)	Associate Professor of History (BPS-19) Govt; Degree College, Sabir Abad (Karak).	Professor (BPS-20) / Principal, Govt; Degree College, Domail (Bannu), vice Sr. No. 41.
11.	Syed Abdul Wajid (BS-20)	Associate Professor of Chemistry (BPS-19) Govt; Postgraduate Mansehra.	Professor (BPS-20) Govt; Postgraduate College, Mansehra; against vacant post.
12.	Mr. Sajjad Samad (BS-20)	Associate Professor of History (BPS-19) Govt; Postgraduate College, Nowshera.	Professor (BPS-20) Govt; Postgraduate College, Nowshera; against vacant post.
13.	Syed Zulfiqar Haider (BS-20)	Associate Professor of Botany (BPS-19) Govt; Degree College, No.1 D.I.Khan.	Professor (BPS-20) Govt; Degree College, No.1 D.I.Khan; against vacant post.
14.	Mr. Sajjad Ali Khan (BS-20)	Associate Professor of English (BPS-19) Govt; Postgraduate College, Kohat.	Professor (BPS-20) Govt; Postgraduate College Kohat, vice Sr. No. 31.
15.	Mr. Rahmat Ullah (BS-20)	Associate Professor of Political Science (BPS- 19) Govt; Degree College, Dargai (Malakand).	Professor (BPS-20), Govt; Postgraduate College, Dargai (Malakand); against vacant post.
16.	Mr. Muhammad Saddiq (BS-20)	Associate Professor of Physics (BPS-19) Govt; Superior Science College, Peshawar.	Professor (BPS-20) / Principal, Govt; Degree College Badaber, Peshawar; against vacant post.



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

PAGE-3

19

S. #	NAME OF OFFICER	FROM	TO
17.	Mr. Abdul Jabbar (BS-20)	Associate Professor of Botany (BPS-19) / Chairman, B.I.S.E. Mardan	Professor (BPS-20) / Principal, Govt. Postgraduate College Charasdda. against vacant post
18.	Mr. Faruk Naz Khan (BS-20)	Associate Professor of Economics (BPS-19) Govt. Degree College, Fesak Khel (Lakki Mawwat)	Professor (BPS-20) / Principal Govt. Degree College, Tank. against vacant post.
19.	Syed Ihtaf Haider (BS-20)	Associate Professor of English (BPS-19) Government College Peshawar.	Professor (BPS-20) Govt. Postgraduate College. Mardan. against vacant post.
20.	Mr. Rahmat Ali (BS-20)	Associate Professor of Zoology (BPS-19) Govt. Degree College, Matta (Swat).	Professor (BPS-20) Govt. Degree College. Matta (Swat). against vacant post.
21.	Mr. Irshad Ahmad (BS-20)	Associate Professor of Economics (BPS-19) Govt. Postgraduate College, Nowshera.	Professor (BPS-20) / Principal. Govt. Degree College, Yar Hussain (Swabi). vice Sr. No. 39.
22.	Muhammad Tariq Saddique (BS-20)	Associate Professor of Computer Science (BPS-19) Govt. Degree College. Pabbi (Nowshera).	Professor (BPS-20) Govt. Postgraduate College. Mardan. against vacant post.
23.	Mr. Nasrullah Khan (BS-20)	Associate Professor of Pakistan Studies (BPS-19) Govt. Degree College, Hayatabad (Peshawar).	Professor (BPS-20) Govt. College. Peshawar. against vacant post
24.	Mr. Ghulam Rasool (BS-20)	Associate Professor of Physics (BPS-19). Govt. Postgraduate College No.1 Abbottabad.	Professor (BPS-20) Govt. Degree College. Havelian (Abbottabad), vice Sr. No. 36.
25.	Mr. Muhammad Zubair (BS-20)	Associate Professor of Pashto (BPS-19) / Bacha Khan University Charsadda.	Professor (BPS-20) Govt. Degree College, Daggar (Buner). against vacant post.
26.	Mr. Muhammad Ayub (BS-20)	Associate Professor of Mathematics (BPS-19) Govt. College Peshawar.	Professor (BPS-20) Govt. College Peshawar, vice Sr. No. 30.
27.	Mr. Shah Nawaz Khan (BS-20)	Associate Professor of Statistics (BPS-19) Govt. Postgraduate College, Mansehra.	Professor (BPS-20) Govt. Postgraduate College. Haripur, vice Sr. No. 38.
28.	Mr. Nisar Ahmad (BS-20)	Associate Professor of Sociology (BPS-19) / Incharge Principal, Govt. Degree College, Dir.	Professor (BPS-20) / Principal Govt. Postgraduate College, Timargara (Dir Lower), vice Sr. No. 35.
29.	Mr. Abdul Majid (BS-20)	Associate Professor of Zoology (BPS-19) Govt. Postgraduate College, Mansehra.	Professor (BPS-20) Govt. Postgraduate College, Mansehra, against vacant post.

Ames  
20/10/17



GOVERNMENT  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

PAGE-4

S. #	NAME OF OFFICER	FROM	TO
30.	Mr. Abuzar, (BS-20)	Professor of Statistics, Govt; College Peshawar.	Professor (BPS-20) Govt; Postgraduate College Charsadda, vice Sr. No. 43.
31.	Mr. Muhammad Yousaf. (BS-20)	Professor of Physics (BPS-20) Govt; Postgraduate College, Kohat	Professor / Principal, Govt; Degree College, Hangu, against the vacant post.
32.	Mr. Mahmood Khan (BS-20)	Principal (BS-20), Govt; Degree College, Landi Jalandar (Bannu).	Professor / Principal, Govt; Degree College, Landi (Bannu), against the vacant post.
33.	Mr. Mir Juman (BS-20)	Principal (BS-20) Govt; Postgraduate College Swabi.	Principal, Govt; Degree College Chari Kapra (Mardan), against the vacant post.
34.	Dr. Qutabud Din. (BS-20)	Principal (BS-20) Govt; Degree College Lahor (Swabi).	Principal, Govt; Postgraduate College Swabi, vice Sr. No. 33.
35.	Mr. Zia-ul-Haq (BS-20)	Principal (BPS-20) Government College. Postgraduate Timaragara.	Professor, Govt; Degree College, Thana (Malakand). against the vacant post.
36.	Mr. Mohammad Tariq (BS-20)	Professor of English (BS-20) Govt; Degree College Havelian (Abbottabad).	Professor, Govt; Postgraduate College, Mandian (Abbottabad), vice Sr. No. 44.
37.	Mr. Abdur Rahman (BS-20)	Professor of Botany (BS-20), Govt; Degree College, No.1 D.I.Khan	Principal (BPS-20), Govt; Degree College, Landi Jalandar (Bannu), vice Sr. No. 32.
38.	Mr. Mumtaz Khan, (BS-20)	Professor of English (BS-20), Govt; Postgraduate College, Haripur.	Principal (BS-20), Govt; Degree College, Kalabat Township (Haripur) against the vacant post.
39.	Mr. Noor-us-Saeed (BS-20)	Principal (BS-20), Govt; Degree College, Yar Hussain (Swabi).	Professor of Political Science (BS-20), Govt; Postgraduate College, Nowshera, against the vacant post.
40.	Mr. Muhammad Nafees, (BS-20)	Professor (BS-20). Govt; Postgraduate College, Lakki Marwat.	Principal (BS-20), Govt; Degree College, Sarai Naurang (Lakki Marwat). against the vacant post
41.	Mr. Hazrat Ullah, (BS-20)	Principal (BS-20), Govt; Degree College, Domail (Bannu).	Professor (BS-20), Govt; Postgraduate College, Bannu against the vacant post.
42.	Mr. Anwarzeb Shah. (BS-20)	Professor (BPS-20), Govt; Postgraduate College Timargara (Dir Lower).	Professor (BS-20) Govt; Postgraduate College, Swabi. vice Sr. No. 48.
43.	Syed Shafiq Ahmad, (BS-20)	Professor (BPS-20) Govt; Postgraduate College, Charsadda.	Principal (BPS-20) Govt; Degree College, Tangi (Charsadda), against the vacant post.
44.	Mr. Saeedul Haq (BS-20)	Professor (BPS-20) Govt; Postgraduate College, Mandian (Abbottabad)	Professor (BPS-20) Govt; Postgraduate College, Mansehra, against the vacant post.

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

PAGE-5

S. #	NAME OF OFFICER	FROM	TO
45.	Mr. Imtiaz Ahmad (BS-20)	Principal, Govt Postgraduate College Lakki Marwat.	Principal (BPS-20) Govt Degree College, Peshawar (D.I Khan), vice Sr. No. 47
46.	Mr. Shantullah (BS-20)	Principal (BS-20), Govt Degree College, Ghazni Khel, (Lakki Marwat)	Principal (BS-20) Government Postgraduate College, Lakki Marwat, Vice Sr. No. 45
47.	Mr. Ghulam Jan (BS-20)	Principal, (BPS-20) Govt Degree College Paharpur (D.I.Khan)	Professor (BPS-20)/ Principal, Govt Degree College, Ghazni Khel (Lakki Marwat), vice Sr No. 40.
48.	Mr. Mehr Zaman (BS-20)	Professor (BS-20) Government Postgraduate College, Swabi.	Principal (BS-20) Govt Degree College, Katlang (Mardan), against the vacant post.

CHIEF SECRETARY  
GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst. No. & date even

Copy forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department.
4. All Divisional Commissioners in Khyber Pakhtunkhwa.
5. Accountant General, Khyber Pakhtunkhwa.
6. All Deputy Commissioners concerned.
7. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
8. District Accounts Officers (concerned Districts).
9. Director Information, Khyber Pakhtunkhwa.
10. Principal of concerned College(s).
11. PS to Chief Secretary, Khyber Pakhtunkhwa.
12. PS to Secretary Establishment
13. Professors concerned.
14. Manager, Govt. Printing Press Peshawar.

(MUHAMMAD JAVED SIDDIQI)  
SECTION OFFICER (ESTT. I)  
PH: & FAX # 091-9210529

ZIA UL HAQ

*Muhammad Javed Siddiqi*  
17/9/11



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

Ann<sup>d</sup> B<sup>o</sup>

Dated Peshawar, the November 18, 2016

(21)

NOTIFICATION

NO.SO(E-I)E&AD/9-88/2016. Government of Khyber Pakhtunkhwa is pleased to order postings/transfers of the following Principals of Higher Education Department, in the public interest, with immediate effect:-

SR.#	NAMES OF OFFICERS	FROM	TO
✓ 1.	(Syed Abdul Wajid Prof. of Chemistry)	GPGC, Mansehra.	Principal GPGC, Mansehra, against the vacant post
2.	Mr. Saeed-ul-Haq, Prof. of Zoology.	GPGC, Mansehra.	Principal, GDC, Battagram, against the vacant post.
3.	Mr. Muhammad Fayyaz, Prof. of Physics.	GPGC, Swabi.	Principal, GDC, Kotha, Swabi, against the vacant post.
4.	Mr. Muhammad Asif, Associate Professor (BPS-19).	GDC, Oghi, Mansehra.	Principal (BPS-20), GDC, Oghi, Mansehra, against the vacant post, in his own pay and scale.
5.	Mr. Bakhtiar, Associate Professor (BPS-19/In charge Principal.	GDC, Gandaf Swabi.	Principal (BPS-19), GDC, Gandaf, Swabi, against the vacant post.
6.	Mr. Abdul Majid, Professor, of Zoology (BPS-20).	GPGC, Mansehra.	Principal, GDC, Balakot, Mansehra, against the vacant post.

CHIEF SECRETARY  
GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst. No. & date even

Copy forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, Higher Education Department.
4. Divisional Commissioners concerned.
5. Accountant General, Khyber Pakhtunkhwa.
6. Deputy Commissioners concerned.
7. Director, Higher Education Khyber Pakhtunkhwa.
8. Principals of concerned colleges.
9. All District Accounts Officers concerned.
10. Director Information, Khyber Pakhtunkhwa.
11. PS to Chief Secretary, Khyber Pakhtunkhwa.
12. PS to Secretary Establishment
13. Professors concerned
14. Manager, Govt. Printing Press Peshawar

Attended  
[Signature]

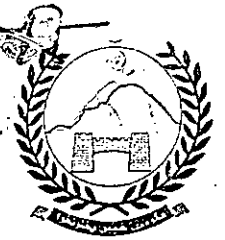
(KASHIF IQBAL JILANI)  
SECTION OFFICER (ESTT. I)  
PH: & FAX # 091-9210529

ZIA.III HAQ/\*\*



# GOVT. POST GRADUATE COLLEGE MANSEHRA

(Ph#: 0997-380325; email: [gemansehra@yahoo.com](mailto:gemansehra@yahoo.com), [www.gemansehra.edu.pk](http://www.gemansehra.edu.pk))



No. \_\_\_\_\_

Dated \_\_\_\_\_

## HANDOVER/TAKE OVER

22

We the undersigned today dated 14.09.2016(AN) complete the procedure under the rules and handover/Takeover charge with reference to the following:

1. All bank accounts, Bank statements, Private funds along with cheque books, pass books and saving schemes certificates.
2. Classified funds register complete in all respects, Receipt Books, Private and Government funds.
3. Cash Book and all Government challans complete in all respects.
4. All stocks and properties of the college.

### Handover

Atiqullah

Principal (Ex on 15/09/2016)

GPGC Mansehra

### Takeover

Syed Abdul Wajid

Vice Principal/DDO

I/C Principal on 15/09/2016

GPGC Mansehra





# GOVT. POST GRADUATE COLLEGE MANSEHRA

(Ph#: 0997-380325; email: [gmansehra@yahoo.com](mailto:gmansehra@yahoo.com), [www.gmansehra.edu.pk](http://www.gmansehra.edu.pk))

13  
Dated

Annex C  
23

## MINUTES OF APPOINTMENT COMMITTEE MEETING:

The meeting of appointment committee of GPGC Mansehra comprising following members regarding recruitment of two vacant posts of class-IV servants, one of hostel bearer and one of sweeper was held in the Conference Hall of GPGC Mansehra today on 24/01/2018 at 11.00AM. All the members of the committee were present in the meeting.

1. Prof. Syed Abdul Wajid Chairman
2. Prof. Riaz Hussain Member
3. Mr. Munir Ahmed (Nominee HED) Member

Following five candidates appeared for the post of sweeper where as 04 candidates appeared for the post of hostel bearer.

### CANDIDATES FOR THE POST OF SWEEPER

1. Muhammad Ayub S/O Tali Zar
2. Faizan Ali S/O Muhammad Tariq
3. Tanveer S/O Sarwar
4. Umair Shoukat S/O Muhammad Shoukat
5. Muhammad Nazir S/O Muhammad Hussain

### CANDIDATES FOR THE POST OF HOSTEL BEARER

1. Muhammad Adil S/O Muhammad Farid
2. Syed Rashid Hussain Shah S/O Syed Abid Hussain Shah
3. Naeem S/O Abdur Rasheed
4. Muhammad Nazir S/O Muhammad Hussain

All the candidates were scrutinized and interviewed by the appointment committee. Physical fitness was checked.

Mr. Tanveer S/O Sarwar at Sr#3 in the list of candidates for sweeper post was selected as the most suitable candidate. Hence the committee recommends him for recruitment against the post of sweeper.

Mr. Muhammad Adil S/O Muhammad Farid at S.No. 1 in the list of candidates for Hostel Bearer post was found as the most suitable candidate. Muhammad Adil is the son of a retired class-IV servant of this college named Muhammad Farid who got retired upon superannuation from the post of hostel bearer hence Muhammad Adil deserves 25% quota as well. Hence the committee recommends him for recruitment against the post of Hostel Bearer.

Committee:

- |                                  |          |
|----------------------------------|----------|
| 1. Prof. Syed Abdul Wajid        | Chairman |
| 2. Prof. Riaz Hussain            | Member   |
| 3. Mr. Munir Ahmed (Nominee HED) | Member   |

JMC Coordinator  
Principal GPGC Mansehra

Attested  
10/01/18

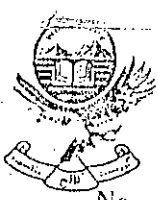
*Box*

Sr#	Name of Candidate	F/Name
01	Muhammad Ayub	Tali Z
02	Faizan ali	Muha
03	<del>Muhammad Tanveer</del>	Muha
04	Umair Shoukat	Muha
05	Muhammad Nazir	Muha
<del>01</del>	<del>Muhammad Adil</del>	<del>Muha</del>
02	S. Rashid Hussain Shah	S. Abi
03	Nacem	Abdul
04	Muhammad Nazir	Muhan

*Handwritten marks:*  
A checkmark next to row 03.  
A checkmark next to row 04.  
A checkmark next to row 05.  
A checkmark next to row 01 (crossed out).

Committee Members:

1. Prof. Syed Abdul Wajid
2. Prof. Riaz Hussain
3. Mr. Munir Ahmed



# GOVT. POST GRADUATE COLLEGE MANSEHRA

(Ph#: 0997-380325; email: [gpmansehra@yahoo.com](mailto:gpmansehra@yahoo.com), [www.gpmansehra.edu.pk](http://www.gpmansehra.edu.pk))

Dated

No.

**Annexure**  
**25**

## APPOINTMENT ORDER:

Consequent upon the recommendations of Departmental Selection Committee, the competent authority is pleased to appoint the following candidates against the vacant posts of Bearer and Sweeper in BPS-03 (9610-390-21310) plus usual allowances as due and admissible under the rules from the date of taking over charge on the terms and conditions mentioned below.

Sr#	Name & Father Name	Post	Address
01	Muhammad Adil S/O Muhammad Farid	Bearer	Kalgaan, Mansehra
02	Tanveer S/O Sarwar	Sweeper	Mansehra

### Conditions:

1. They will produce health & age certificates from the Medical Superintendent/Civil Surgeon.
2. They will have all the rights/privileges contained in Khyber Pakhtunkhawa Civil Servants Act, 1973 with all amendments made therein including Khyber Pakhtunkhawa Civil Servant (Amendment) Act, 2013 and Rules made therein.
3. In case of resignation, the appointee will have to give one month prior notice, otherwise his one month pay/allowances shall be forfeited to Government.
4. They will be governed by such Rules & Regulations as may be issued from time to time by Government.
5. The appointee should join their posts within 07 days of the issuance of this Notification failing which it shall be presumed that they are not interested to join the same.
6. In case of disciplinary matters, Khyber Pakhtunkhawa Civil Servants Act, 1973 and Khyber Pakhtunkhawa Civil Servant (Efficiency & Discipline Rules) 2011 shall be applicable.
7. They will be on probation for a period of 01 Year extendable upto 02 Years.

Principal,  
GPGC, Mansehra

Endst: No. 252-56 dated 12/02/2018

Copy of the above is forwarded for information to the:

1. Director Higher Education Khyber Pakhtunkhawa, Peshawar.
2. Mr. Munir Ahmad, Nomince of Director Higher Education Department, Govt. of Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer, Mansehra.
4. Concerned official.
5. Office record.

*Attestd*  
*[Signature]*  
*12/2/18*

Principal,  
GPGC, Mansehra

26 **Annex-1**, P-10 (F)  
**TENTATIVE SENIORITY LIST OF PROFESSORS BPS-20(COLLEGE CADRE).**  
**(MALE) CORRECTED UPTO 31-01-2016 (Total Posts in B-20=172)**

S.No.	Name of Officers with Qualification	Date of Birth Domicile	Date of 1st Entry in to Govt. Service	1st Regular Appointment to the service/cadre			Regular/Promotion to the present post.			Remarks
				Date	BPS	Method of App.	Date	BPS	Mode of App.	
1	Prof. Muhammad Tariq M.A Economics, Principal GDC, Hayatabad	19.04.1956 Charsadda	22.12.1980	28.04.1981	17	P.S.C	23.10.1998	20	Promotion	
2	Prof. Dr. Muhammad Yaqub Khan Ph.D Pol:Science, GDC, No.1 D.I.Khan	01.01.1959 D.I.Khan	16.10.1980	21.05.1983	17	P.S.C	19.2.2008	20	Promotion	
3	Prof. Sardar Bahadar Khan M.A Pol: Science, GPGC, No. 1 Abbottabad	01.10.1957 Lakki	06.10.1981	24.01.1984	17	P.S.C	03.09.2009	20	Promotion	
4	Prof. Fayyaz Ali Shah M.A Pol:Science, Principal GPGC, Mardan	03.04.1959 Mardan	07.10.1981	26.01.1984	17	F.S.C	03.09.2009	20	Promotion	
5	Prof. Ghulam Qasim Marwat M.A Pak Study(M.Phil) HETTA Peshawar	10.09.1959 Baranu	29.09.1987	29.09.1987	17	PSC	03.09.2009	20	Promotion	
6	Dr. Fazli Subhani M.Phil /Ph.D Zoology, Principal GDC, Dargai	15.08.1957 Dir	07.09.1983	07.09.1983 23.5.1997	17 19	PSC	16-3-2011	20	Promotion	
7	Mr. Atiqullah M.A Economics, Principal GPGC, Mansehra	15.09.1956 Charsadda	01.09.1982	11.01.1984 23.5.1997	17 19	PSC	16-3-2011	20	Promotion	
8	Muhammad Zahir Shah M.A Pol:Science GPCJC, Swat	17.09.1956 Dir	18.10.1980	11.06.1985 23.5.1997	17 19	PSC	16-3-2011	20	Promotion	

*Handwritten signature and date*  
 10/11/16

(27)



102	Mr. Manzoor Ali M.A Economics, GDC, Katlang Mardan	25.02.1961 Swabi	08.09.1987	08.09.1987 26.05.2010	17 19	PSC Promotion	13.12.2013	20	Promotion	
103	Mr. Mir Ghulam Khan M.Sc Biology, GPGC, Kohat.	01.12.1959 Karak	9.9.1987	20.02.1991	26.5.2010	19	Promotion	21.11.2014	20	Promotion
104	Mr. Roshmali Khan M.Sc Maths G.P/G.C, Karak	16.06.1962 Karak	03.11.1988	12.06.1990	26.5.2010	19	Promotion	21.11.2014	20	Promotion
105	Mr. Rehmat Karim M.Sc Stats, G.C, Timergara	01.02.1963 Dir	13.10.1987	30.06.1990	26.5.2010	19	Promotion	21.11.2014	20	Promotion
106	Mr. Nowsherawan M.Sc Stats, GDC, Kabal Swat	21.04.1959 Swat	26.10.1986	23.01.198	26.5.2010	19	Promotion	21.11.2014	20	Promotion
107	Mr. Sher Bahadar Khan M.Sc Stats, Principal GDC, Khanpur	28.04.1960 Peshawar	01.10.1989	01.10.1989	26.5.2010	19	Promotion	21.11.2014	20	Promotion
108	Mr. Abdul Hadi M.A English, GPGC Timergara.	01.11.1956 Shangla	02.11.1988	02.11.1988	26.5.2010	19	Promotion	21.11.2014	20	Promotion
109	Mr. Inayat ur Rehman M.A Islamiyat, G.P/G.C, Mardan	03.01.1965 Nowshera	18.09.1989	18.09.1989	26.5.2010	19	Promotion	21.11.2014	20	Promotion
110	Mr. Izhar Ul Haq M.A Arabic, Islamiyat, G.C Lahor	20.02.1961 Swabi	22.09.1985	22.09.1985	26.5.2010	19	Promotion	21.11.2014	20	Promotion
111	Mr. Hidayat Ullah M.A History, GDC, Sabir Abad	15.01.1965 Karak	03.11.1988	03.11.1988	26.5.2010	19	Promotion	21.11.2014	20	Promotion
112	Syed Abdul Wajid M.Sc Chemistry, G.P/G.C, Mansehra	20.03.1964 Mansehra	08.12.1988	08.12.1988	26.5.2010	19	Promotion	21.11.2014	20	Promotion
113	Mr. Sajjad Samad M.A History, G.C, Nowshera.	20.06.1957 Peshawar	01.10.1984	10.01.1987	26.5.2010	19	Promotion	21.11.2014	20	Promotion
114	Mr. S. Zulfiqar Haider M.Sc Botany, G.C, Phar Pur.	01.04.1963 Tank	11.11.1987	11.11.1987	26.5.2010	19	Promotion	21.11.2014	20	Promotion
115	Mr. Sajjad Ali Khan M.A English, G.P/G.C, Kohat	08.05.1957 Kohat	14.03.1983	25.05.1999	26.5.2010	19	Promotion	21.11.2014	20	Promotion
116	Mr. Rehmat Ullah M.A Pol. Science, GDC, Dargai	22.04.1959 Lakki Marwat	16.06.1985	16.06.1985	26.5.2010	19	Promotion	21.11.2014	20	Promotion
117	Muhammad Saddiq M.Sc Physics, GSSC, Peshawar	15.03.1963 Peshawar	09.06.1988	09.06.1988	26.5.2010	19	Promotion	21.11.2014	20	Promotion

Handwritten signature and date at the bottom left corner.



136	Mr. Anwar Ali M.A History, GC, Peshawar	26.06.1959 Mardan	29.09.1984	29.09.1984	26.5.2010	19	Promotion	20	Promotion
137	Ghulam Mustafa S/O Abdul Ghaffar M.A Pak Study, GPGC, Mansehra	25.06.1966 Mansehra	24.08.1995	24.08.95	16.03.2011	19	Initial Recruitment	20	Promotion
138	Dr. Faziur Rehman M.A Pak. Study, GSSC, Peshawar	16.12.1960 Bannu	11.02.1990	11.02.1990	16.03.2011	19	Initial Recruitment	20	Promotion
139	Hamid Ullah Jan S/O Said Nawaz Khan M.Sc Comp: Sc, GPGC, Bannu	30.09.1967 FR. Bannu	01.06.1992	01.06.92	14.09.2010	19	Initial Recruitment	20	Promotion
140	Muhammad Fayaz S/O Kiramat Khan M.Sc Physics, GPGC, Swabi	24.09.1967 Swabi	17.10.1992	17.10.92	27.10.2010	19	Initial Recruitment	20	Promotion
141	Tasbihullah S/O Muhammad Ibrahim M.A English, GDC, Eakka Ghund	09.04.1967 Charsadda	13.10.1992	13.10.92	08.10.2010	19	Initial Recruitment	20	Promotion
142	Shaukat Ali S/O Zaffar Khan M.Sc Physics, GPGC, Timargara	06.03.1962 Dir	09.10.1989	09.10.89	27.10.2010	19	Initial Recruitment	20	Promotion
143	Muhammad Shafee S/O Shalowzen M.A Pashto, GDC, Banda Daud Shah	07.07.1970 Karak	8.12.1988	16.09.98	15.06.2010	19	Initial Recruitment	20	Promotion
144	Hastam Khan S/O Muhammad Shoib LLB, Law, GPGC, Nowshera.	08.06.1958 Mardan	11.11.1937	23.01.88	14.09.2010	19	Initial Recruitment	20	Promotion
145	Abdul Wahab S/O Juma Gul M.A Islamiyat, GDC, Nathialgali	20.03.1964 Battagram	02.10.1989	02.10.89	28.01.2011	19	Initial Recruitment	20	Promotion
146	Muhammad Anwar S/O Amir Dastar M.Sc. Physics GDC, Shabqadar	13.04.1968 Karak	27.10.2010 (Direct-19)		27.10.2010	19	Initial Recruitment	20	Promotion
147	Abdur Rashid S/O Ahmad Ullah M.Sc. Chemistry, GC, Peshawar	15.2.1959 Dir Lower	6.02.1991 (Lect)	6.2.1991	18.02.2011	19	Initial Recruitment	20	Promotion
148	Fazli Nasir S/O Abdul Qadir M.A Pashto, GSSC, Peshawar	10.08.1963 Dir	07.08.1990	07.08.90	15.06.2010	19	Initial Recruitment	20	Promotion
149	Shujat Ali S/O Karim Dad M.Sc Physics, GPGC, Mardan	01.04.1972 Mardan	09.02.2002	9.2.2002	27.10.2010	19	Initial Recruitment	20	Promotion
150	Dr. Ashfaq Ahmad Khan S/O Abdul Qayum Khan, M.Sc Chemistry, GPGC, Haripur	01.01.1961 Haripur	12.11.1987	23.01.88	18.02.2011	19	Initial Recruitment	20	Promotion
151	Muhammad Idrees S/O Muhammad Anwar, M.A Arabic, GC, Tangi	10.04.1966 Charsadda	15.06.1992	15.06.92	31.12.2011	19	Initial Recruitment	20	Promotion
152	Tajud Din S/O Muhammad Din M.A Urdu, GSSC, Peshawar	25.06.1965 Dir	05.09.1995	5.9.1995	31.03.2011	19	Initial Recruitment	20	Promotion

Handwritten signature and date: 20/09/10

Govt of KP  
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**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

DATED Peshawar, the February 28, 2018

**NOTIFICATION**

NO. SO(E-I)E&AD/9-88/2017. The competent authority, on the recommendations of the Provincial Selection Board, is pleased to promote the following Male Associate Professors (BS-19) of Higher Education Department to the post of Professor (BS-20), on a quia basis, with immediate effect:-

S. #.	NAME OF OFFICER
1.	Mr. Sakhi Muhammad Khan
2.	Dr. Lal Said Jan
3.	Mr. Gul Rehman
4.	Mr. Mehtab Ahmad
5.	Mr. Zakoullah Qureshi
6.	Mr. Muhammad Iftikhar
7.	Mr. Gul Badshan
8.	Mr. Mir Baz Khan
9.	Mr. Siyasat Ali
10.	Mr. Muhammad Inam
11.	Syed Farkhanda Shah
12.	Mr. Sher Ahmad
13.	Mr. Muhammad Jenangir
14.	Mr. Safdar Khan
15.	Mr. Shafiqul Rehman
16.	Mr. Saïd Kamal

2. The Professors on promotion shall remain on probation for a period of one year, in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and extendable for another year with the specific orders of appointing authority within two month of the expiry of first year of probation period as specified in Rule 15(2) of rules ibid.

3. Consequent upon the above, the following adjustments are made:

SR. #	NAME OF OFFICER	FROM	TO
1.	Mr. Sakhi Muhammad Khan (BS-20)	Associate Professor of Arabic/Islamiyat, Principal GDC, Kakk Bannu.	GPGC, Bannu, against the vacant post.
2.	Dr. Lal Said Jan (BS-20)	Associate Professor of Physics, GPGC, Mardan	GPGC, Mardan, against the vacant post.
3.	Mr. Gul Rehman (BS-20)	Associate Professor of Chemistry GPGC, Mardan	GPGC, Mardan, against the vacant post.
4.	Mr. Mehtab Ahmad (BS-20)	Associate Professor of Economics, GPGC, Mardan, ADDOLABAD.	GPGC, Mardan, against the vacant post.
5.	Mr. Zakoullah Qureshi (BS-20)	Associate Professor of Geography, GDC, Pabb, Nowshera.	GDC, Pabb, Nowshera, against the vacant post.
6.	Mr. Muhammad Iftikhar (BS-20)	Associate Professor of Islamiyat, GDC, Palau Malakand.	GDC, Palau Malakand, against the vacant post.
7.	Mr. Gul Badshan (BS-20)	Associate Professor of Islamiyat, GDC, Bajaur Agency.	His services are being put at the disposal of FAJ Agency.
8.	Mr. Saïd Kamal (BS-20)	Associate Professor of Urdu, GDC, Peshawar.	GDC, Peshawar, against the vacant post.

**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

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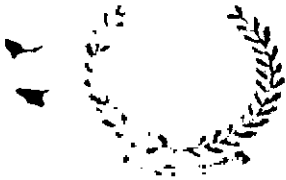
9.	Mr. Siasat Ali (BS-20)	Associate Professor of Physics GPGC, Charsadda	GPGC, Dargai Malakand, as Professor against the vacant post.
10.	Mr. Muhammad Inam (BS-20)	Associate Professor of English GDC, Takht Bhal Mardan.	GDC, Thana Malakand, as Professor against the vacant post.
11.	Syed Farukhuda Shah (BS-20)	Associate Professor of Economics, GDC, Zaida Swabi.	GPGC, Swabi As Professor, he will take over charge after actualization of promotion of officer at S.No.13.
12.	Mr. Sher Ahmad (BS-20)	Associate Professor of Political Science, GDC, Ghazni Khel Lakki.	GDC, No.1, D.I.Khgn. As Professor, against the vacant post.
13.	Mr. Muhammad Jinnah (BS-20)	Associate Professor of Urdu, GPGC, Abbottabad.	GPGC, Swabi, as Professor against the vacant post. His promotion shall be on national basis.
14.	Mr. Safdar Khan (BS-20)	Associate Professor of Statistics GDC, Thana Malakand.	GDC, Thana Malakand, as professor, vice Sr. No.17 of adjustment.
15.	Mr. Shafiqur Rehman (BS-20)	Associate Professor of Physics, GDC, S.K Bala Bannu.	GPGC, Bannu. As Professor, against the vacant post.
16.	Mr. Siasat Ali (BS-20)	Associate Professor of Statistics GDC, Kakki Bannu.	GPGC, Bannu. As Professor, against the vacant post.

In addition to the above, the following adjustment of Professors (EPS-20), Associate Professors (EPS-19) are made:-

Sr. No.	NAME OF OFFICER	FROM	TO
17.	Mr. Siasat Ali (BS-19)	Principal GDC, Thana Malakand	GDC, Thana, Malakand, as Associate Professor, vice Sr. No.18 of the Promotees.
18.	Mr. Arifullah (BS-20)	Principal GDC, Lakar Mohmand Agency	GDC, Balhela, Malakand as Professor, against the vacant post.
19.	Mr. Akbar Ahmad (BS-19)	Associate Professor of English, under transfer to GDC Talch, Lakki Marwat as Principal	GPGC, Lakki Marwat, as Associate Professor of English against the vacant Post
20.	Mr. Siasat Ali (BS-19)	Associate Professor of National Science, GDC, Sarai Nourange	GPGC, Sarai Nourange, as Associate Professor, vice Sr. No.19.
21.	Mr. Siasat Ali (BS-19)	Professor GPGC, Mansera	Principal at GPGC Mansera vice Sr. No.22
22.	Mr. Siasat Ali (BS-19)	Associate Professor of Physics GPGC, Mansera	Associate Professor at GDC Mansera, vice Sr. No.21
23.	Mr. Siasat Ali (BS-19)	Associate Professor of Physics GPGC, Mansera	As Principal at GDC No 1 Abbottabad, against the vacant post.
24.	Mr. Siasat Ali (BS-20)	Associate Professor of Physics GPGC, Mansera	Associate Professor at GDC Abbottabad, vice Sr. No.23
25.	Mr. Siasat Ali (BS-19)	Associate Professor of Physics GPGC, Mansera	GDC, Pesawa, vice Sr. No.8 of the Promotees
26.	Mr. Siasat Ali (BS-19)	Associate Professor of Statistics GDC, Patai	GDC, Thana Malakand, as the vacant post.

Mr. Siasat Ali  
 (BS-19)  
 Principal  
 GDC, Mansera





**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

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- |    |                             |  |  |
|----|-----------------------------|--|--|
| 27 | Dr. Izaz Ali<br>(BS-19)     | Associate Professor of Islamic Studies GPGC, Timergara | GDC, Gulabad District, against the vacant post.                      |
| 28 | Mr. Jawas Khan<br>(BS-19)   | Associate Professor of Physics, Township, Kohat        | GDC-KDA His services are placed at the disposal of FATA Secretariat. |
| 29 | Mr. Damsaz Khan<br>(BS-19)  | Associate Professor of Chemistry GDC, Lalander Bannu.  | GDC, Mamash Khail, Bannu, against the vacant post.                   |
| 30 | Prof. Hashim<br>(BS-20)     | Principal GDC Butkhera                                 | As a professor at GDC Mandian, against the vacant post.              |
| 31 | Mr. Mehtab Ahmad<br>(BS-20) | Professor GPGC, Mandian Abbottabad.                    | GPGC Marshehra, vice Sr No.24  |

**CHIEF SECRETARY  
GOVERNMENT OF KHYBER PAKHTUNKHWA**

Endst. No. and date even.

**Ccpy forwarded to the:-**

- 1 Principal Secretary to Governor Khyber Pakhtunkhwa;
- 2 Principal Secretary to Chief Minister Khyber Pakhtunkhwa
- 3 Secretary to Government of Khyber Pakhtunkhwa Higher Education Department
- 4 All concerned Divisional Commissioners in Khyber Pakhtunkhwa
- 5 Accountant General, Khyber Pakhtunkhwa
- 6 All concerned Deputy Commissioners in Khyber Pakhtunkhwa
- 7 Director Higher Education Khyber Pakhtunkhwa Peshawar
- 8 All Principals of concerned Colleges mentioned above
- 9 All concerned District Accounts Officers in Khyber Pakhtunkhwa
- 10 Director Information Khyber Pakhtunkhwa
- 11 Principal of concerned college(s)
- 12 PS to Chief Secretary Khyber Pakhtunkhwa
- 13 PS to Secretary Establishment
- 14 Officers concerned
- 15 Manager Govt Printing Press Peshawar

(ISHIAQ AHMAD)  
SECTION OFFICER (ESTT. II)  
PH: & FAX # 091-9210529

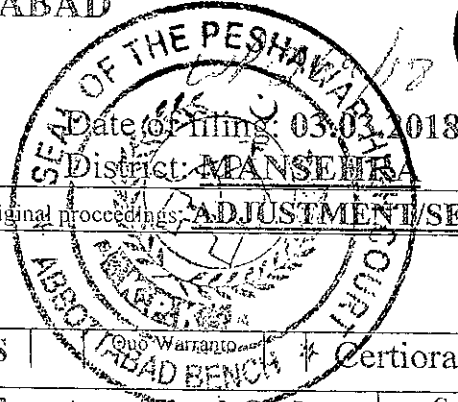
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# IN THE PESHAWAR HIGH COURT, BENCH ABBOTTABAD



Case type: **Writ Petition** Nature of original proceedings: **ADJUSTMENT/SENIORITY**

Category Code: - 5 0 7 0 8

Review/Contempt of Court in respect of: N/A

WRIT OF Habeas Corpus Prohibition MANDAMUS Quo Warranto Certiorari

Forum	Date	Interlocutory/Final Order	Case Pertains to
=	=	=	DIVISIONAL BENCH

Petitioner Name	SYED ABDUL WAJID
Mobile No.	0333-5029929
Address	PRINCIPAL, GOVERNMENT POST GRADUATE COLLEGE, MANSEHRA.
CNIC No.	13503-2951395-5
Email Address	Nil.

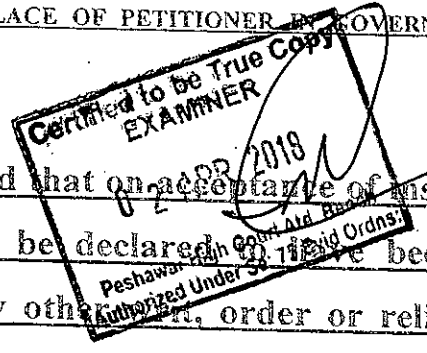
Counsel for petitioner(s)	SHAD MUHAMMAD KHAN, ADVOCATE SUPREME COURT, MANSEHRA.
Mobile No.	0346-5808870
Address	DISTRICT COURTS MANSEHRA.
CNIC No.	13503-3208069-3
Email Address	smk.asc@gmail.com

Respondents	GOVT. OF KPK THROUGH SECRETARY HEC AND OTHERS.
Address:	PESHAWAR AND MANSEHRA.

Original order/Action/Inaction Complained of:  
ADJUSTMENT OF THE PETITIONER FROM THE POST OF PRINCIPAL GOVERNMENT POST GRADUATE COLLEGE, MANSEHRA TO THE POST OF PROFESSOR OF GOVERNMENT POST GRADUATE COLLEGE, MANSEHRA AND THE ADJUSTMENT OF RESPONDENT NO.5 AS PRINCIPAL AT THE PLACE OF PETITIONER IN GOVERNMENT POST GRADUATE COLLEGE, MANSEHRA.

Prayer (in brief)

It is, therefore, most humbly prayed and requested that on acceptance of instant Writ Petition, the impugned notification may kindly be declared null and void and no orders have been passed without lawful authority and of no effect or any other order or relief as this Honourable Court deems fit and appropriate in the circumstances of the case, may also be issued/passed.



Law/Rules governing the original proceedings/Action/Inaction.  
Constitution of Islamic Republic of Pakistan, 1973.

Signature of Petitioner or counsel: *[Handwritten Signature]*

Date: 05/03/18

Sign: D. Ali

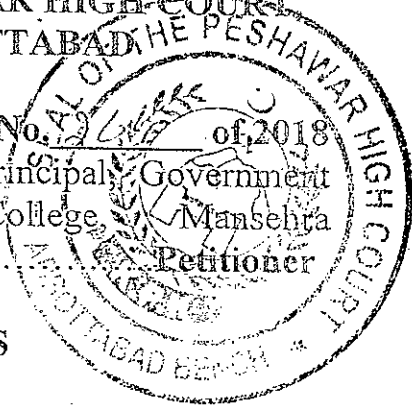
*[Handwritten Signature]*  
Dated 03.03.2018

SCANNED FILE

BEFORE THE PESHAWAR HIGH COURT  
BENCH ABBOTTABAD

W.P No. 122 of 2018

Syed Abdul Wajid, Principal, Government  
Post Graduate College, Mansehra  
Petitioner



VERSUS

Government of Khyber Pakhtunkhwa  
through Secretary Higher Education, KPK  
Peshawar etc..... Respondents

WRIT PETITION

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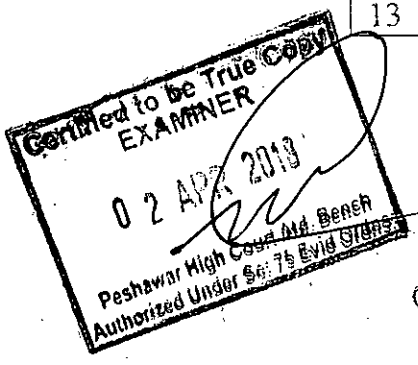
S#	Particulars of documents	Annexure	Pages
1	Memo of Writ Petition alongwith affidavit.	.....	1 to 9
2	Correct addresses of the parties.	.....	10
3	Certificate and list of law books.	.....	11
4	Copy of notification.	"A"	12
5	Copy of minutes of the committee.	"B"	13
6	Copy of the scoring marks.	"C"	14
7	Copy of the appointment orders.	"D"	15
8	Copy of Seniority list.	"E"	16 to 28
9	Copy of notification.	"F"	29 to 31
10	Copies of performance certificate.	"G"	32 to 55
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12	Court fees stamp Rs.500/-	...	6 to 63
13	Wakalat Nama.	.....	64

Dated 03.03.2018

Syed Abaul Wajid  
Petitioner

Through

SHAD MUHAMMAD KHAN,  
Advocate Supreme Court,  
Of Pakistan.

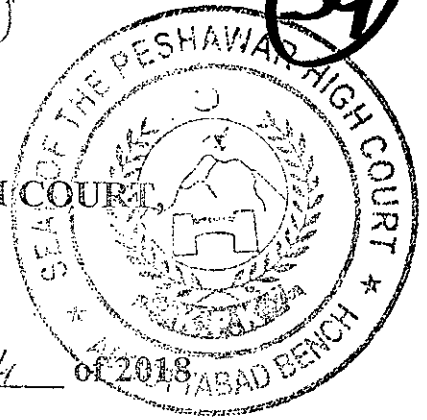


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BEFORE THE PESHAWAR HIGH COURT,  
BENCH ABBOTTABAD



W.P No. 264 of 2018

Syed Abdul Wajid, Principal, Government  
Post Graduate College, Mansehra  
.....Petitioner

VERSUS

1. ✓ Government of Khyber Pakhtunkhwa through Secretary Higher Education, KPK Peshawar.
2. ✓ Director, Higher Education Department, KPK Peshawar.
3. ✓ Minister for Higher Education KPK, Peshawar.
4. ✓ Personal Assistant Muhammad Yasir to Minister for Higher Education, KPK Peshawar.
5. ✓ Ghulam Mustafa, Professor Pak Studies, Government Post Graduate College, Mansehra ..... Respondents.

Certified to be True Copy  
EXAMINER  
02 APR 2018  
Peshawar High Court Abd Bench  
Authorized Under Sec: 75 Ord: 2001

No: 310  
05/03/18

WRIT PETITION UNDER ARTICLE 199  
OF THE CONSTITUTION OF ISLAMIC  
REPUBLIC OF PAKISTAN 1973 FOR A  
DECLARATION TO THE EFFECT  
THAT THE ADJUSTMENT OF  
PETITIONER FROM THE POST OF  
PRINCIPAL GOVERNMENT POST  
GRADUATE COLLEGE, MANSEHRA  
TO THE POST OF PROFESSOR OF  
GOVERNMENT POST GRADUATE  
COLLEGE, MANSEHRA AND THE

✓  
05/03/18

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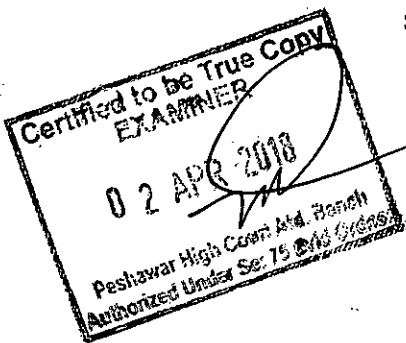
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ADJUSTMENT OF RESPONDENT NO.5  
AS PRINCIPAL AT THE PLACE OF  
PETITIONER IN GOVERNMENT POST  
GRADUATE COLLEGE, MANSEHRA  
IS ARBITRARY, FANCIFUL, MALAFIDE  
AND WITHOUT LAWFUL AUTHORITY  
OR ANY OTHER DIRECTION OR  
INSTRUCTION WHICH IS DEEMED  
APPROPRIATE IN THE CIRCUMSTANCES  
OF THE CASE, MAY GRACIOUSLY BE  
ISSUED.

Respectfully Sheweth!

*The brief facts leading to the instant Writ Petition are arrayed as follows: -*

1. That, the petitioner qualified M.Sc. in Chemistry in 1986 who was appointed as a Lecturer in Grade-17 and was promoted in Grade-20 on 21.11.2014. Respondent No.5 was also appointed as a Lecturer on 24.08.1995 and Later on, he was promoted to grade-20 and is serving in Government Post Graduate College, Mansehra.
2. That, the petitioner was posted as Head of Chemistry Department from 2010 to 16.09.2016, who devotedly



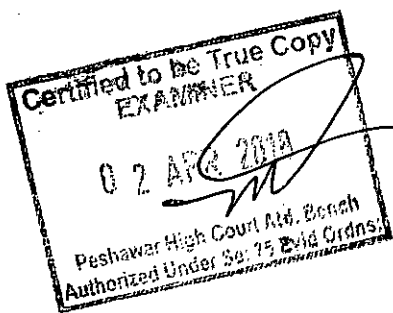
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16/03/19

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discharged his duties. The petitioner was subsequently posted as Vice Principal at Government Post Graduate College, Mansehra and he served as a Vice Principal from 2013 to 2016 as well.

3. That, on the retirement of the Principal Government Post Graduate College, the seat of Principal fell vacant and the petitioner who was the most Senior professor in grade-20 was recommended by the outgoing Principal and after his retirement, the petitioner was posted as Principal Government Post Graduate College, Mansehra against the vacant post vide notification No.SO(E-I)E&AD/9-88/2016 dated 18.11.2016 on merit on the basis of seniority.



*(Copy of notification is attached as annexure "A").*

4. That, two posts of sweeper and hostel bearer, class-IVs became vacant at Government Post Graduate College, Mansehra. The Director Higher Education issued directions to fill-up vacant posts with

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immediate effect on merit basis. A committee was constituted for the appointment of above noted seats consisting of the petitioner, Professor Riaz Hussain and Muneer Ahmed Deputy Director (Nominee of HED). During the scrutiny, the committee found Muhammad Adil and Tanveer, eligible for the said posts of Hostel bearer and sweeper. Adil is the son of retired class-IV of this institution who retired as Hostel Bearer hence, on the basis of 25% quota, he was appointed against the said post. Respondent No.4 sent diverse messages to appoint his recommendee ignoring the merit policy in respect of Muhammad Nazir for the post of Hostel bearer who could not qualify the merit in scoring and as such, the request of respondent No.4 was turned down. The petitioner passed an order of the appointment of deserving candidates.

Certified to be True Copy  
EXAMINER  
02 APR 2018  
Peshawar High Court Attd. Bench  
Authorized Under Sec. 75 Ord. 19

(Copy of minutes of the committee, the scoring marks and the appointment orders are attached as annexure "B", "C" & "D" respectively).

6/27/03/10

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5. That, a tentative seniority list of Professor (BPS-20) college cadre was issued upto 31.01.2016 and the petitioner was shown at serial No.112 whereas respondent No.5 was shown at serial No.137 of the said seniority list. As per seniority list, the petitioner was the senior most Professor in the college, was entitled to be adjusted/posted against the post of Principal.

*(Copy of Seniority list is attached as annexure "E").*

6. That, respondent No.4 moved a summary for the demotion of the petitioner from the post of Principal Government Post Graduate College, Mansehra to the post of Professor. A notification was issued on 28.02.2018 whereby the petitioner was posted as a Professor at Government Post Graduate College, Mansehra whereas respondent No.5, Professor Government Post Graduate College, Mansehra was adjusted as Principal of Post Graduate College, Mansehra at the place of petitioner.

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EXAMINER  
02 APR 2018  
Peshawar High Court, Atd. Bench  
Authorized Under Sec: 75

*(Copy of notification is attached as annexure "F").*

625/24/12



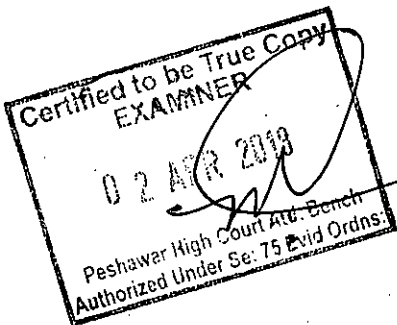
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7. That, there is no other efficacious remedy except to approach this Honourable Court, on the following amongst the other grounds: -

### GROUNDS

- a. That, the order of adjustment of petitioner from the post of Principal Government Post Graduate College, Mansehra to the post of Professor and the adjustment of respondent No.5 to the post of Principal Government Post Graduate College, Mansehra is against the facts, law and all settled principles followed since long.
- b. That, the petitioner is the most senior professor according to the seniority list and being entitled was adjusted as a Principal but his demotion from the post of Principal in an arbitrary manner is quite alien to law.
- c. That, there is a consistent practice that the senior most Professors will



10/03/18

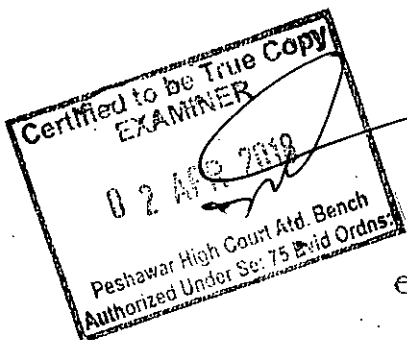
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be posted against the post of Principal and petitioner was accordingly adjusted/posted against the said post of Principal. According to policy of Higher Education Department, Senior most Professor in BPS-20 having qualities of leading the faculty, shall be considered for such an important post. The petitioner was sent for such training i.e. training of Leadership and Management at LUMS, Lahore in December, 2017 through Higher Education Department, KPK.

d. That, respondent No.4, who had approached the petitioner for the appointment of his nominee had nourished a grudge against the petitioner and on account of his blessings, the notification was issued vide which the petitioner was removed from the post of Principal and a junior most Professor was adjusted against the petitioner at the post of Principal.

e. That, the petitioner has uplifted the college standard and in recognition of his outstanding performance, the college was declared the best college



103/03/18

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throughout KPK and was awarded special grant of 1.4 Million.

*(Copies of Performance record are annexed as annexure "G").*

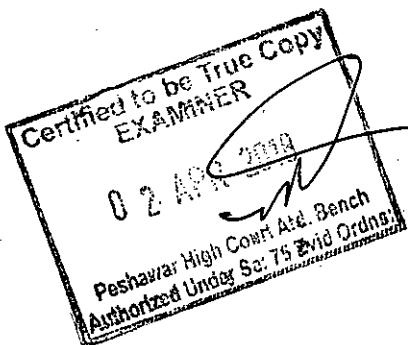
- f. That, the involvement of respondent No.4 in the internal affairs of College tantamounts to sheer malafide which led to the demotion/removal of petitioner from the post of Principal.

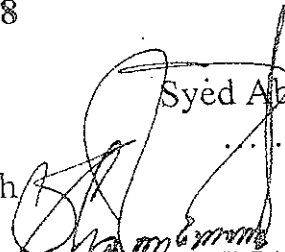
It is, therefore, most humbly prayed and requested that on acceptance of instant Writ Petition, the impugned notification may kindly be declared to have been passed without lawful authority and of no effect.

INTERIM RELIEF.

It is further prayed that the operation of the impugned notification may kindly be suspended till the disposal of instant Writ Petition.

Dated 03.03.2018



Through  Syed Abdul Wajid  
.....Petitioner  
:  
SHAD MUHAMMAD KHAN,  
Advocate Supreme Court,  
Of Pakistan.

3  
6-3/03/18

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AFFIDAVIT.

I, Syed Abdul Wajid, Principal, Government Post Graduate College, Mansehra, Petitioner, do hereby solemnly affirm and declare on oath that the contents of the foregoing Writ Petition are true and correct and nothing has been concealed from this Honourable Court.

Dated 03.03.2018

Syed Abdul Wajid  
(DEPONENT)

13503-2957395-5

1279/20

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...at the time was verified  
...  
Syed Abdul Wajid  
Principal  
Government Post Graduate College  
Mansehra

5/3/18

As per check

03/03/18

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EXAMINER  
02 APR 2018  
Peshawar High Court Atd. Bench  
Authorized Under Sec: 75 Evid Ordns

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BEFORE THE PESHAWAR HIGH COURT  
BENCH ABBOTTABAD

W.P. No. 279 of 2018

Syed Abdul Wajid, Principal, Government  
Post Graduate College, Mansehra  
.....Petitioner

VERSUS

Government of Khyber Pakhtunkhwa  
through Secretary Higher Education, KPK  
Peshawar etc.....Respondents

WRIT PETITION

CORRECT ADDRESSES OF THE PARTIES

PETITIONER

Syed Abdul Wajid, Principal, Government Post  
Graduate College, Mansehra.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa through  
Secretary Higher Education, KPK Peshawar.
2. Director, Higher Education  
Department, KPK Peshawar.
3. Minister for Higher Education KPK, Peshawar.
4. Personal Assistant Muhammad Yasir to Minister  
for Higher Education, KPK Peshawar.
5. Ghulam Mustafa, Professor Pak Studies,  
Government Post Graduate College, Mansehra.

Dated 03.03.2018

Syed Abdul Wajid  
.....Petitioner

Through

SHAD MUHAMMAD KHAN,  
Advocate Supreme Court,  
Of Pakistan.

Certified to be True Copy  
EXAMINER  
02 APR 2018  
Peshawar High Court Ptd. Bench  
Authorized Under Sec. 73 Ptd. Ord.

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205/03/18

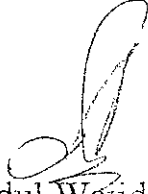
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CERTIFICATE.

Certified that no such like Writ Petition has ever been preferred before this Honourable Court nor decided from any higher forum. Furthermore, copies of memo of Writ Petition have been sent to respondents through registered post.

Dated 03.03.2018

  
Syed Abdul Wajid  
.....Petitioner


Through

  
SHAD MUHAMMAD KHAN,  
Advocate Supreme Court,  
Of Pakistan.

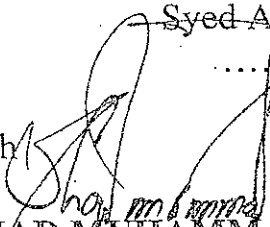
LIST OF LAW BOOKS.

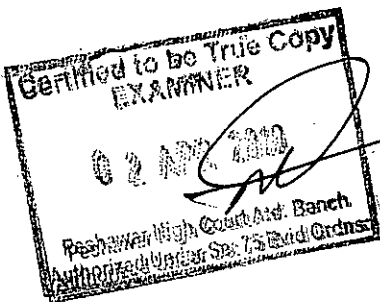
1. Constitution of Islamic Republic of Pakistan, 1973.
2. Other law books as per need.

Dated 03.03.2018

  
Syed Abdul Wajid  
.....Petitioner

Through

  
SHAD MUHAMMAD KHAN,  
Advocate Supreme Court,  
Of Pakistan.



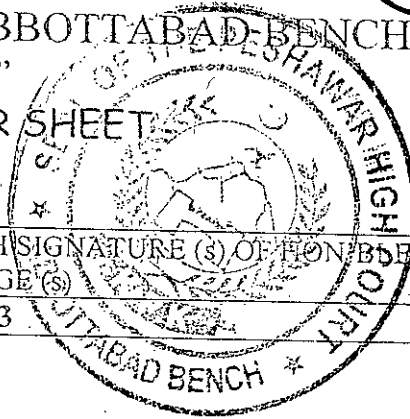


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(45)

PESHAWAR HIGH COURT ABBOTTABAD BENCH.  
FORM "A"  
FORM OF ORDER SHEET



Date of Order or Proceeding	ORDER OF THE COURT WITH SIGNATURE (S) OF HON'BLE JUDGE (S)
2	3
28.03.2018	<p><u>W.P.No.264-A/2018.</u></p> <p><b>Present:-</b> Mr. Shad Muhammad Khan, Advocate for petitioner.</p> <p style="text-align: center;">*****</p> <p><u>SYED MUHAMMAD ATTIQUE SHAH, J.-</u> Petitioner through instant constitutional petition seeks the following prayer:-</p> <p style="text-align: center;"><i>"It is, therefore, most humbly prayed and requested that on acceptance of instant writ petition, the impugned notification may kindly be declared to have been passed without lawful authority and of no effect."</i></p> <p>2. Brief but relevant facts of the instant writ petition are that respondents' department has transferred/ adjustment the petitioner from the post of Principal Government Post Graduate College, Mansehra to the post of Professor vide order 28.2.2018. The petitioner being aggrieved from his adjustment order, therefore, challenged the same through the instant writ petition.</p>

**Certified to be True Copy**  
**EXAMINER**  
02 APR 2018  
Peshawar High Court A.B. Bench  
Authorized Under Sec. 75 Evid Ordns.

3. At the very outset when learned counsel for petitioner was asked regarding the maintainability of the instant writ petition, which squarely falls within the ambit of terms and conditions of service and in such like matters, the jurisdiction of this Court is barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973. The learned counsel for petitioner could not controvert the same, however, he argued that the impugned transfer order is the result of political pressure and influence, thus this Court can interfere in the same.

4. Be that as it may, since the matter relates to the terms and conditions of service of civil servant, therefore, under Article 212 of Constitution of Islamic Republic of Pakistan, 1973, this Court has got no jurisdiction to entertain the same. However, the petitioner can agitate the same before the proper forum constituted under the law.

5. Thus, the instant writ petition is dismissed *in limine*, being not maintainable.

Announced:  
28.03.2018

Certified to be True Copy  
EXAMINER  
02 APR 2018  
Peshawar High Court Ald. Bench  
Authorized Under Sec: 75 Evid Ordns:

*Self Judge* [Signature]  
*Self Judge* [Signature]

office  
4/30/18



The Honourable Chief Minister,  
Khyber Pakhtunkhwa,  
Peshawar.

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ATX  
"I"

(Through Proper Channel)

Date: 04/04/2018.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER No. SO(E-1)E&AD/4-2/2018 DATED 28/02/2018 WHEREBY THE MAJOR PENALTY OF DEMOTION HAS BEEN IMPOSED.**

Dear Sir

With profound gratitude I have the honour to state that I have served the Higher Education Department Khyber Pakhtunkhwa for almost thirty years. That I was appointed as Lecturer in Chemistry on 08-12-1988 at Government College, Haripur. In May, 1999 I was promoted as Assistant Professor (BPS-18) at Government Post Graduate College, Mansehra. That I was further promoted as Associate Professor (BPS-19) at Post Graduate College Mansehra in May 2010. I was promoted to the post of Professor in November, 2014 (Annex. A). Whereas, I was appointed as Vice-Principal in 2013. Consequent upon the retirement of previous Principal, the post of Principal got vacant and I was handed over the charge as acting Principal on 15-03-2016 (Annex-B). I was regularized to the post of Principal after fulfilling codal formalities and due process of law on 18-11-2016, vide notification No.SO(E-1)E&AD/9-88/2016. (Annex-C)

That, I came to know on 05-03-2018 that without any lawful justification I have been demoted to the post of Professor and another Professor of the same college who is very junior to me as per appointment and seniority list (Annex.D), has been posted as Principal at my post in sheer violation of law and natural justice (Annex. E). That it is also sheer

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violation of natural justice that is no one should be condemned unheard.  
Reliance raised upon 2005 SCMR page. 768.

48

That, two posts one each of sweeper and hostel bearer, class-IV's got vacant at the Government Post Graduate College Mansehra. The Director Higher Education issued direction to fill-up the posts with immediate effect on merit basis. For this purpose a committee was formed/constituted consisting of the present Appellant, Professor Riaz Hussain and Muneer Ahmed Deputy Director (Nominee of Higher Education Department). The Committee found Muhammad Adil and Tanveer to be eligible for the posts of hostel bearer and sweeper respectively on purely merit basis (Annex. F). Muhammad Adil is the son of retired hostel bearer and eligible under Retired Class IV son quota (25%). The Personal Assistant to the Minister for Higher Education Khyber Pakhtunkhwa approached/contacted for appointment of another candidate named as Muhammad Nazir as hostel bearer (who was found incompetent/ineligible) who could not qualify the merit (Annex. G). That on the recommendation of selection/appointment committee I issued order of appointment of Muhammad Adil and Tanvir (Annex. H). The Personal Assistant to the Minister for Higher Education threatened me and said that now you will face the consequences.

It is pertinent to mention here that a notification of demotion in sheer violation of the law of the land and the Constitution of Pakistan 1973 was issued on 28-02-2018 which came into my knowledge on 05-03-2018 when a junior Professor in Appointment and Seniority list was posted as Principal and I was demoted as Professor from the post of Principal. Demotion is a major penalty as per Government Servant (Efficiency & Discipline Rules 2011 Khyber Pakhtunkhwa). Thus the major penalty of demotion is imposed without conducting regular inquiry and without any fault on the part of

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appellant is a question mark and strictly condemned by law and Honorable Apex Court of Pakistan.

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That during my services as the Principal of GPGC, Mansehra I left no stone unturned in uplifting the college standards in curricular and co-curricular fields. I inserted my level best capabilities to improve the infrastructure of the college through renovation and beautification as directed by the high ups. It is worth mentioning that GPGC, Mansehra made progress in all walks of academics by leaps and bounds. It is pertinent to mention here that during my tenure, GPGC, Mansehra has been granted best ever award among 205 government colleges of KPK. (Annex. I)

**Grounds:**

1. That the impugned order is illegal, arbitrary, capricious and against the norms and principles of natural justice.
2. ***"That the mode of exercise of power should be that every departmental authority high or low, and for that matter the State/ Government functionaries, must follow the law and should not be led by their own whims and wishful thinking"***. Reliance is placed on **2001 PLC (CS) 1162**.
3. That the appellant was on a permanent post and is being demoted from the post of Principal without conducting regular inquiry which is the mandatory provision of law. It is candied principle of law as held by the Supreme Court of Pakistan that before imposing the major penalty authority is bound to conduct a regular inquiry, therefore the impugned order has no value in the eyes of law. **Reliance is based on 2006 SCMR 104 & 2009 PLC (CS) 19.**
4. That the principles of natural justice would be applicable to all judicial and non-judicial proceedings, notwithstanding the fact that right of hearing has not been provided in the statute, governing the proceedings. The action of

Attd  
Principal  
10/9/18

the department against the appellant was certainly an adverse action, which required that the appellant should be heard before affecting the order. No such procedure was adopted and the appellant was victimized without specifying any reason or giving him a chance to explain his position. **[Reliance is placed in 2002 T.D. (Service) 370].**

- 5. That action of body or corporation in violation to the principles of natural justice is without lawful authority and without legal effect. Therefore, the impugned order has no legal sanctity. **Reliance is placed on 2002 T.D.(Service) 370.**

That law by now is fully settled that no person can be condemned unheard. It is a part of every statute unless expressly or impliedly done away with. The courts have never accepted an order as legal where the person occupying an office is removed without hearing or notice. Reliance is placed on **2002 SCJ 438, 2002 TD (Service) 420 (SC), 2004 PLC (CS) 82 (SC).**

- 6. It is the candied principle of law as held by the Supreme Court of Pakistan that before imposing the major penalty authority is bound to conduct a regular inquiry. Therefore, the impugned order has no value in the eyes of law. Reliance is placed on **2006 SCMR 104, 2009 PLC (CS) 19.**

- 7. That the Honourable Supreme Court of Pakistan in a case reported as 2004 PLC (CS) 1228 and 2005 SCMR 1142 has held that, "Civil servant duly appointed on regular basis much earlier than others could not be relegated to a junior position".

- 8. It has been held in PLD 1989 Lah. 175 that, "An act of the executive against the requirement of law or non-observance thereof, cannot be justified on any reasonable hypothesis or principle of law". Therefore, the penalty of demotion from Post imposed on the petitioner in violation to the requirement of law was illegal and void ab initio.

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9. That nowadays courts are applying cordial principle of natural justice more liberally even to cases in which there is no statutory provision of personal hearing. That the appellant was not provided with a personal hearing. Therefore, the order of demotion is illegal and liable to be set aside. [Reliance is placed on 1994 SCMR 2232 & 2001 T.D (Service) 68].
10. That it has been held in a case reported as PLJ 2005 Supreme Court 435, that, *"Government of Pakistan would secure well being of people by raising their standard of living and by ensuring equal adjustment of rights between employers and employees and providing all citizens within available resources of country facilities for work and adequate livelihood and reduce disparity in income and earning of the individual"*.

**Prayer:**

In the light of facts and grounds as stated above your honor is humbly requested that the impugned order SO(E-1)E&AD/4-2/2018 dated 28/02/2018 may kindly be set aside and my services be restored to the post of Principal, GPGC, Mansehra in the interest of justice.

Yours Faithfully



Prof: Syed Abdul Wajid,  
Government Post Graduate College,  
Mansehra, Khyber Pakhtunkhwa.  
Contact No: 0333-50299929  
Email: shahprofessor@yahoo.com

Handwritten notes and signature in the bottom left corner, including the date 19/9/18.



**Directorate of Higher Education Khyber Pakhtunkhwa**

Attached Department Complex, Gate No.3, Khyber Road Peshawar

Phone No: 091-9211025-9210217-9210242, Fax No: 091-9210215

Ans J  
53

No. 318-35 DHE/AD (Academics)/PMC 4th Meeting File,

Dated January 4, 2017

To

- The JMC Co-ordinators
1. Principal Government College Peshawar.
  2. Principal Govt Postgraduate College Charsadda.
  3. Principal Govt Postgraduate College Nowshera.
  4. Principal Govt Postgraduate College Mardan.
  5. Principal Govt Postgraduate College Swabi.
  6. Principal Govt Postgraduate Jehanzeb College Saidu Sharif Swat.
  7. Principal Govt Postgraduate College Dargai (Mkd Agency).
  8. Principal Govt Postgraduate College Timergara.
  9. Principal Govt Degree College Daggar Buner.
  10. Principal Govt Degree College Chitral.
  11. Principal Govt Postgraduate College Kohat.
  12. Principal Govt Postgraduate College Karak.
  13. Principal Govt Postgraduate College Bannu.
  14. Principal Govt Postgraduate College Lakki Marwat.
  15. Principal Govt Degree College No.1 DIKhan.
  16. Principal Govt Postgraduate College Haripur.
  17. Principal Govt Postgraduate College No.1 Abbottabad
  18. Principal Govt Postgraduate College Mansehra.

**Subject: - MINUTES OF THE 4<sup>TH</sup> PROVINCIAL MANAGEMENT COUNCIL (PMC) MEETING**

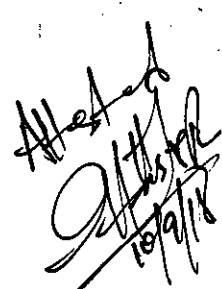
I am directed to refer to the above noted subject and to enclose herewith minutes of the subject meeting which was held under the chairmanship of Secretary Higher Education Archives and Libraries Department Govt of Khyber Pakhtunkhwa on 29/12/2016 at 12:30 PM at the Conference Hall of Archives Directorate Peshawar for information and compliance, please.

  
Assistant Director (Academics)

Encs. No. \_\_\_\_\_

Copy of the above is forwarded to the:-

1. PS to Secretary Higher Education Archives & Libraries Department Govt of Khyber Pakhtunkhwa.
2. Project Director (PMU) opposite GC Peshawar.
3. Project Director (HEMIS) Defense Colony Khyber Road Peshawar.
4. PA to Director Higher Education Khyber Pakhtunkhwa.

  
10/1/17

Assistant Director (Academics)

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JMC File  
9/1/2017

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59/01/2017

**NOTES OF THE 4<sup>TH</sup> PMC MEETING DATED 29-12-2016 WITH THE SECRETARY HIGHER EDUCATION IN CHAIR**

54

The subject meeting was started with the verses from the Holy Quran by Prof. Dr. Fazali Subhani, Principal Govt College Peshawar. The Director Higher Education welcomed the participants and introduced the agenda of the meeting.

The Secretary Higher Education also welcomed the participants and invited debate on the agenda items one by one. He emphasized that the decisions made in a meeting must be implemented and a proper follow up is desired.

**Agenda item No.(1) Revision of Section-4 subsection A(i) of the Admission Policy 2014-15:**

After a threadbare discussion from different participants, the chair nominated a committee comprising of three members, namely,

1. Professor. Dr. Subhan Ullah Shah, (Principal GPGC Nowshera).
2. Professor Abdul Jabbar (Principal Govt Post Graduate College Charsadda).
3. Professor Shoukat Baig (Principal Govt Post Graduate Jchanzeb College Saidu Sharif Swat).

The committee had submitted its report regarding the proposed amendment in the section 4 subsection A(i) of the Admission Policy within one month considering all the dimensions for consideration of the house.

**Agenda item No (2) Internal Examination:**

The house unanimously supported the idea of conducting the internal exams for the academic improvement of the students and it was agreed upon that Inter Exam would be held in the 2<sup>nd</sup> week of March and that of the Degree Classes in the 2<sup>nd</sup> week of April each year.

**Agenda item No (3) Monitoring Reports:**

The Secretary Higher Education pointed out few clusters with major issues and asked the respective JMC Coordinators to seriously take up the weak areas raised in the Monitoring Reports in their respective Cluster Colleges and remove the shortcomings immediately and report the cases to the High Ups for further necessary action.

The Principals ensured the chair of their full effort to remove the weaknesses and that discipline will be maintained in all areas reported upon.

Regarding the slackness of the staff and students in conducting the practicles for their Science subject, the chair directed the principal to ensure proper holding of practicles. In order to further streamline the conduct of practicles, the following three-member committee was found to submit its recommendation after thorough deliberation.

- Prof. Taj Muhammad (Principal Govt Post Graduate College No.1 Abbottabad)  
Prof. Abdul Wahab (Principal Govt Post Graduate College Haripur)  
Prof. Syed Abdul Wajid (Principal Govt Post Graduate College Mardan)

**Agenda item No (4) Rationalization/ Adjustment of Faculty:**

Regarding the issue, after a thorough discussion and deliberation, raising different options, for instance, the establishment of Regional Directorates (**Agenda item No.7**), the powers of the JMC; the enhancement of powers of the principal, with the ultimate aim of ensuring maximum academic quality, a committee of the following three members is constituted to report within one month paying special attention to the enhancement of powers of the Principals of Govt Colleges, for administrative and fiscal decentralization.

1. Prof. Dr Muhammad Tariq, Ex-Principal, GDC Hayatabad.
2. Prof. Dr Fazli Subhani Principal Govt College Peshawar.
3. Prof. Dr. Fazli Rehman, Principal Govt Degree College Hayatabad.

Attested  
29/12/16

While regarding the function of the 3-tier management in Higher Education Department, a committee comprising 3 members, namely,

1. Professor Abdul Jabbar (Principal Govt Post Graduate College Charsadda).
2. Prof. Dr. Subhanullah Shah, Principal GPGC Nowshera
3. Prof. Shoukat Baig, Principal GPGJC Swat.

was nominated to discuss all the pros and cons of the issue and submit its report by one month for consideration of the house.

The Chair asked the Director Higher Education to remain in touch with all the committees formed and provide his input to formulate the best options/ suggestions for administrative and fiscal decentralization in the Higher Education Department. The committees can join co-opted member where necessary.

**Agenda item No (5) Adoption of Substantial Quota in Scholarships for Higher Studies of the Faculty:**

It was agreed upon that the issue of faculty development is of paramount importance in the wake of introduction of BS Programme in Govt Colleges. Hence a reasonable quota may be reserved for the College faculty in Higher Education Commission Scholarships for the Higher Education Department. In addition, faculty development program will be started for strengthening BS program.

It was also brought into the notice of the house that a similar discrimination is meted out to the BS College students. As different incentives in the form of free laptops and scholarships are offered to BS University students, while no such facility for academic improvement is offered to the equally talented students from the college sector.

The chair ensured the house that the issue will be taken up with the concerned to ensure the quota.

**Agenda item No (6) Future Plan of BS-4 year Degree Programme:**

The chair informed the house that the department as per National Education Policy and Higher Education Commission guidelines is adopting BS 4-year Degree Programme in its colleges and abolishing the conventional Degree programs eventually.

He further informed the house that meetings regarding the issue are regularly held with the Higher Education Commission to finalize the various points in questions regarding the BS 4-year degree program in Govt Colleges. It was also decided that a two-year plan for 100% conversion to BS program in all Govt Colleges is to be submitted by Project Director PMU.

**Agenda item No (8) Other Common Issues:**

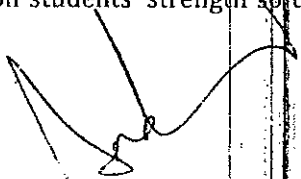
The Director Higher Education presented certain other issues of common interest before the house for consideration.

Regarding the under-enrolled colleges, it was agreed upon that a campaign should be launched by the respective colleges to attract more and more admissions.

In an alternate situation, the chair asked the JMC coordinators that the vacant building may be utilized for the academic purpose by other cluster Govt Colleges.

Regarding the funding formula furnished annually by the principals, Additional Secretary Dr. Khalid Khan asked the principals to base their demands on students' strength so that rationalized estimates are received and processed.

The meeting ended with mutual thanks.





WORKING PAPER FOR THE 4<sup>TH</sup> MEETING OF PROVINCIAL  
MANAGEMENT COUNCIL (PMC) DATED: 8/6/2015.

55

The directives for convening the current i.e. the 4<sup>th</sup> meeting of PMC was conveyed by the department vide letter SO ( Trg)HE/ 4-4/ PMC/ 2014-15 dated 28.5.15 with the two point agenda as given below at S.No : 2 & 3. The same was circulated to all members vide letter No.13480/DHE/AD(SA)PMC dated 01/06/2015. The agenda of the meeting is given as below:

S.NO	AGENDA ITEM	DESCRIPTION	DECISION
1	Minutes of the 3 <sup>rd</sup> PMC Meeting	The 3 <sup>rd</sup> PMC meeting was held on 6/4/2015 under the chairmanship of Secretary to Govt. for Higher Education, Archives and Library Department at this venue. The minutes of the meeting were submitted to the chairperson for approval. The approved minutes were circulated among all JMC Coordinators vide letter No. 13843- 63/ DHE / AD (SA) / Notification dated 3 .6.2015. The same has been placed before the house for confirmation.	Approved,
2	Draft Act, 2015 of Khyber Pakhtunkhwa Institutions of Higher Education	The same act has been circulated by S.O (Training) vide letter No: SO (Trg) HE/ College Council/ 2012, dated: 11.5.2015. The same is also placed as agenda item for thorough analysis, discussion and arriving at a unanimous decision before the house.	Approved [Signature] 10/7/15

Modalities for the promotion of Associate Professors (B-19) to Professors/ Principals

- i. According to the existing policy the post of professors are filled by promotion from the holders of the post of Associate professors (B-19) on the basis of seniority cum fitness through Provincial Selection Board. The 40 days training at HETTA has been made mandatory for promotion to B-20.
- ii. The principals are appointed on the basis of seniority from professors/ Associate professors (according to the post) on seniority basis.

4 Any other

The members / JMC coordinators can present the agenda item with the approval of the Chair. They can also pass resolution on certain issues if seconded by another member.

*Attended*  
*[Signature]*  
10/9/18

MINUTES OF THE 3<sup>RD</sup> MEETING OF PROVINCIAL MANAGEMENT COUNCIL (PMC) HELD ON 6.04.2015 AT THE CONFERENCE ROOM OF DIRECTORATE OF ARCHIVES & LIBRARIES DEPARTMENT.

57

The third meeting of Provincial Management Council was held on 6.04.2015 in the conference room of Directorate of Archives & Libraries Department Peshawar under the Chairmanship of Secretary Higher Education Archives & Libraries Department.

List of participants is at Annexure-A

2. After the recitation of the Holy Quran, the Director Higher Education, being Secretary of Provincial Management Council shed light on the importance of this body and apprised the house about the proceedings of the two previous meetings of the same august body. Before switching over to the discussion on the agenda items, he welcomed the participants and explained that it was his long standing desire to have a thought provoking meeting with all concerned in order to bring Efficiency in Excellency in the educational standard of this province to enable the students to compete at all levels in future.
3. Following the same way, he stressed on the role of the Principal that he is a focal person upon whose shoulder lies the whole responsibility of his college and he can maximize the potentialities of the faculty as well as students by engaging them in multiple academic activities. Although most of the colleges are running short of faculty but the process of rationalization is attained finality and very soon the vacant posts in the most of the disciplines will be filled by adjusting the surplus staff. Furthermore the strengthen the capacity of Principals, training session of 20 days is also likely to be arranged during summer vacations/off session.
4. The BS 4 year Degree Programme was also taken for discussion and the Chairman of Provincial Management Council told that the Management Director Frontier Education Foundation has been asked for furnishing a critique for future planning of said issue and he also stated that a committee consisting of Prof. Muhammad Tariq Principal GDC Hayatabad, Prof. Atiqullah Principal GPGC Mansehra & Prof. Zahir Shah Principal GPGJC Swat under the Chairmanship of the Director Higher Education may be constituted for the review of SOP/Functions in powers of the 3 tires Management Council with a view to make it clear and practicable.
5. During the Proceedings of the meeting Prof. Subhanullah Shah Principal GPGC Nowshera moved a resolution which was seconded by Prof. Abid Hussain Shah Principal GDC No.1 D.I.Khan for awarding Charirman Committee membership to regional Director Higher Education commission and Chairman BISE Peshawar which was unanimously passed by the House. Another resolution moved by Dr. Fazal Subhani Principal GC Peshawar secondly by Prof. Fayaz Ali Shah Principal GPGC Mardan for awarding membership to Female Colleges and PMC which was unanimously passed by the House.
6. After the Preliminary talks of the worthy Secretary Higher Education, the Director Higher Education presented the Agenda items and the resultant decisions are hereby accorded against each at Annexure-B.
7. The meeting ended with a vote of thanks to and from the Chair.

Attested  
10/7/15

1 mo  
Assistant Director  
Students Affairs  
Directorate of H.E.  
NPK Peshawar

# DIRECTORATE OF HIGHER EDUCATION

## KHYBER PAKHTUNKHWA PESHAWAR

PHONE NO. 091-9211025-9210242-9211803 FAX NO.091-9210215

No. 13813-13 /DHE/AD (SA)/PMC

Dated Peshawar the 3<sup>rd</sup> June, 2015

To

58

The Principals/Coordinator for JMC, s

1. Govt College Peshawar.
2. Govt Postgraduate College Charsadda.
3. Govt Postgraduate College Nowshera.
4. Govt Postgraduate College Mardan.
5. Govt Postgraduate College Swabi.
6. Govt Postgraduate Jehanzeb College Swat.
7. Govt Degree College Thana (Malakand Agency).
8. Govt Postgraduate College Timergara Dir Lower.
9. Govt Degree College Daggar Buner.
10. Govt Degree College Chitral.
11. Govt Postgraduate College Kohat.
12. Govt Postgraduate College Karak.
13. Govt Postgraduate College Bannu.
14. Govt Postgraduate College Lakki Marwat.
15. Govt Degree College No.1 DIKhan.
16. Govt Postgraduate College Haripur.
17. Govt Postgraduate College No.1 Abbottabad.
18. Govt Postgraduate College Mansehra.

Subject: - **APPROVED MINUTES OF THE 3<sup>RD</sup> MEETING OF PMC**

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of approved minutes of the 3<sup>rd</sup> Provincial Management Council(PMC) which was held on 06/04/2015 for strict compliance.

I am further directed to ask you that the same may also be circulated amongst the cluster Colleges (Male and Female) for strict compliance.

*I me 3/6/15*  
Assistant Director (General)

Endst No. \_\_\_\_\_

Copy of the above is forwarded to the:-

1. PS to Secretary Higher Education Archives and Libraries Department Govt of Khyber Pakhtunkhwa.
2. PA to Director Higher Education Khyber Pakhtunkhwa.
3. PA to Additional Director Higher Education Khyber Pakhtunkhwa.
4. Section Officer (Training) Higher Education Department w/r to her letter No.1781 dated 28/5/2015.
5. Deputy Director (Establishment) Higher Education Khyber Pakhtunkhwa along with a copy of minutes for necessary action at serial No. 4.
6. Assistant Director (Accounts) local directorate along with a copy of minutes for necessary action at serial No. 4&5.

*[Handwritten signature]*  
20/6/15

Assistant Director (General)

باتحاد و تصدیق شدہ شاعرت صوبہ پنجتو تنخواہ کا سب سے زیادہ فخریت ہوئے اور اخبار

A.B.C CERTIFIED

The Daily  
**SHAMAL**  
ABBOTTABAD

ایبٹ آباد

فون نمبر  
0992-385577

چیف ایڈیٹر و پبلشر  
نیاز پاشا جاون

جلد نمبر 29 بدھ - یکم شعبان 1439ھ 18 اپریل 2018ء 5 مہینہ 2073 ب

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صوبائی وزیر تعلیم نے میرٹ کی دھجیاں اڑادیں، غیر قانونی ہجرتیاں جاری

حکومت پنجاب کی پوسٹ پر سن پسند امیدوار تعینات، میرٹ پر آنے والے دھکے کھانے لگے  
کیا (نمائندہ شمال) ایبٹ آباد صوبائی وزیر تعلیم غیر قانونی ہجرتوں کا سلسلہ شمال سرک کا حکم  
مستحق اجتناب نے میرٹ کی دھجیاں بکھیر کے رکھ دی ایجنٹ میں لب (باقی صفحہ 6 بقیہ نمبر 27)

بقیہ 27 دھجیاں

اسٹنٹ کی پوسٹ پر سن پسند امیدوار کا آرڈر  
کر دیا میرٹ پر آنے والے دھکے کھانے  
پر مجبور ہونے لگے ملکہ پورہ کی رہائشی ایم ایس سی  
گولڈ میڈلسٹ کونفرانڈاز کر کے میرٹ پر نہ  
آئی خاتون کا آرڈر گورنمنٹ گزٹری کارڈ  
نمبر ایک میں کر دیا وہ مشتاق غنی کیا انصاف ہے  
تیرا ذرائع کے مطابق ایبٹ آباد سرکاری محکموں  
میں ہجرتوں کی پابندی ٹوپی ڈرامہ ثابت ہوئی  
صوبائی وزیر تعلیم نے میرٹ کی دھجیاں بکھیر دی  
حکومت پنجاب ڈیپارٹمنٹ اشارہ کے قریب  
لب اسٹنٹ کی پوسٹوں پر میرٹ پر نہ  
آنے والے امیدواروں کو ترجیح دے کر تعینات  
کر دیا گیا میرٹ پر آنے والے گولڈ میڈلسٹ  
کونفرانڈاز کر دیا ملکہ پورہ کی رہائشی سماء ف ایم  
ایس سی گولڈ میڈلسٹ تھی اور صاف میرٹ پر تھی

11 اپریل 2018ء

حکومت تعلیم کے افسران اور صوبائی وزیر تعلیم نے  
اس کا حق بھین کر کسی سن پسند کے حوالے کر دیا  
متاثرہ افراد نے فی الفور چیف جسٹس، عمران  
خان وزیر اعلیٰ سے نوٹس لینے کا مطالبہ کر دیا۔

باتیاد تصدیق شدہ اشاعت صوتیچٹوخواہ کاسب زیادہ فروخت ہونیوالا اخبار

The Daily SHAMAL ABBOTTABAD

ایبٹ آباد

# شمال

فون نمبر  
0992-385577

چیف ایڈیٹر و پبلشر  
نیاز پاشا جڈون

جلد نمبر 29 بدھ 15 شعبان 1439ھ 2 مئی 2018ء 19 مئی 2073 ب 8 صلیات 10 پڑھے شہر نمبر 73

60

(1)

منشیان غنی کی ایما پر ہزارہ بھڑکے کالجزمیں غیر قانونی بھرتیاں جاری  
ماسکو (کورس رپورٹر) ماسکو سمیت ہزارہ بھڑکے  
میل نیٹیل کالجزمیں ایڑی لوڈ پر بھرتیاں جاری ہیں  
ان بھڑکوں کے (ہائی صفحہ 6 بقیہ نمبر 2)

**بقیہ 2 بھرتیاں**  
بھڑکیوں نے منشیان غنی کے دست راست ہارنای  
تھیں کاہم بول رہا ہے ذراغ نے تااگر بھڑکیوں میں  
بات نہ مانے والے کالج کے کریمہ 21 اور کریمہ 20  
کے افسران کو کھڑی لان کا کڑوا دی جاتی ہے ہاسٹرو  
پوسٹ کر بھڑکیوں کا کالج میں دو بھرتیاں بھی افسان  
کا ہزارہ کالنے کے حوالہ ہیں مالہ ہزار سالوں کے  
دوران ہزارہ بھڑکے ہائیر ایجوکیشن میں کس طرح کے  
کھیل کھیلے گئے اس بار سے اہم اگشانات متوجع ہیں

باتیاد تصدیق شدہ اشاعت صوتیچٹوخواہ کاسب زیادہ فروخت ہونیوالا اخبار

The Daily SHAMAL ABBOTTABAD

ایبٹ آباد

# شمال

فون نمبر  
0992-385577

چیف ایڈیٹر و پبلشر  
نیاز پاشا جڈون

جلد نمبر 29 منگل 21 شعبان 1439ھ 8 مئی 2018ء 25 مئی 2073 ب 8 صلیات 10 پڑھے شہر نمبر 78

(2)

**بقیہ 17 بھرتیاں**  
کھاتے پلے کے منشیان غنی کے چہیتے نے ماسکو ہائیر  
ایجوکیشن پر قبضہ جمالیا ٹیکوں سے لے کر بھڑکیوں تک  
ایڑی لوڈ وصول کئے جانے لگا ہے اداروں کے  
سربراہوں کے بھی ہاتھ پاؤں ماسکو میں کلاس فور کی بھڑکیوں  
پوسٹ کر بھڑکیوں کا کالج ماسکو میں کلاس فور کی بھڑکیوں  
پوسٹ کر بھڑکیوں کے دوران وفات پا جانے اور ریٹائرڈ  
ہو جانے والے بھڑکیوں کے کوٹے کا بھی خیال نہیں رکھا  
جاتا اور ایک بار سے اگکات جاری کر کے انہیں  
پادشاہی کا کھیل جاری کیا ہوا ہے غیر قانونی اس  
دھند سے میں اگکات بننے والے سینئر پروفیسر کو بھی  
سخت اقامت کا نشانہ بنا کر سینئر پروفیسر کو کھینچت کر  
کے ادارے کے وقار کو بھی بھڑکیوں کا جا رہا ہے اس  
بار سے اہم اگشانات متوجع ہیں

**منشیان غنی کے چہیتے نے ہائیر ایجوکیشن پر  
قبضہ جمالیا غیر قانونی بھرتیاں جاری**  
ماسکو (کورس رپورٹر) انٹینیشن آف پاکستان  
کے اگکات بھی کھو (ہائی صفحہ 6 بقیہ نمبر 17)

# وکالت نامہ

کورٹ فیس

بعدالت ضمیمہ: سروس کنڈیشنز، ملائیہ، لیٹاور

عنوان: سید عبدالجبار بنام حکومت پاکستان

منجانب: مستند

نوعیت مقدمہ: سروس ایبل

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آل مقام عند حضرت عدلیہ / محمد اسحاق / منیر عدلی / ایدو ویشن کی کورٹ، محمد اسحاق کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کہو دیا تاکہ سند رہے۔

بمقام: سید عبدالجبار  
Accepted

المرقوم: 10 ستمبر 2018

Accepted  
وقاعل فونوٹیسٹ پچھری (ایبٹ آباد)

Accepted

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فکر بقول لہو و شہ ابوحنبل

جناب عالی

گزارش سے حکم و عمل کے بارے میں 18/9/2018 عنوان

اس کے بارے میں 11/29/18 کا سٹیٹس دیا گیا ہے، یہ دیکھ کر اس کا اہم

حکومت کے وزراء کی مصروفیت نظر میں رہے ہے۔  
یہ سب باتوں کا نتیجہ ہے۔

الغرض  
محمد ارشد علی نقوی 18/9/2018



**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**CAMP COURT, ABBOTTABAD**

**Service Appeal No. 1129/2018**

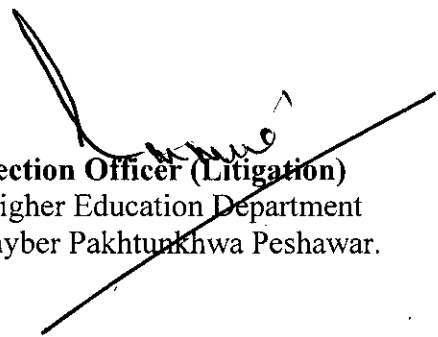
Syed Abdul Wajid..... (Appellant)

**VERSUS**

Govt. of Khyber Pakhtunkhwa through the worthy Secretary Higher Education, Archives & Libraries Department & Others..... (Respondents)

**INDEX**

<b>S No.</b>	<b>Description of Dements</b>	<b>Annexure</b>	<b>Pages</b>
1.	Joint Para-wise comments		1-2
2.	Affidavit		3
3.	Final Seniority List	Annexure-A	4-5
4.	Reply to stay application	Annexure-B	6

  
**Section Officer (Litigation)**  
Higher Education Department  
Khyber Pakhtunkhwa Peshawar.

(1)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT ABBOTTABAD.**

S.A # 1129/2018

Syed Abdul Wajid.....Appellant.

Versus

Govt. of Khyber Pakhtunkhwa

Through Chief Secretary, Khyber Pakhtunkhwa

And Others.....Respondents

**SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1, 2 & 3.**

**Respectfully Sheweth: -**

**Preliminary Objections:-**

1. That the appellant has got no cause of action/locus standi to file the instant Service appeal.
2. That the appellant has not come to the Honourable Tribunal with clean hands and is trying to conceal material facts.
3. That under section 10 of Civil Servant Act 1973, every civil servant is liable to be transferred anywhere in the Province or outside of the Province.
4. That the appeal in hand is hit by doctrine of laches.
5. That the appellant is estopped by his own conduct to file the instant service appeal.

**Facts: -**

- 1) Correct.
- 2) Correct.
- 3) Correct to the extent that the appellant was posted as Principal, Government Postgraduate College, Mansehra.
- 4) Incorrect. The competent authority in the appointment of Class-IV employees is the Principal concerned who is also the Chairman of the DSC with other two members i.e. nominee of the Principal and nominee of the department as laid down in APT Rules 1989. Moreover, no such diverse messages were sent to the appellant. The Principal is competent to appoint any eligible candidate, in consonance with the whole committee members as mentioned above.
- 5) Incorrect. That one Professor, namely Saeed-Ul-Haq is Senior, to the appellant as reflected at S.No 20 while the appellant is reflected at S.No. 35 of the final seniority list (copy enclosed as **Annex-A**). However, seniority having nothing to do with the transfer/posting as both appellant and Respondent No. 5 are Professors (BPS-20).
- 6) Correct to the extent that posting/transfer against administrative posts like Principal is a continuous and routine process by the Provincial Government and it always does the same in the best interest of the institution. Moreover, transfer/adjustment of Professor Ghulam Mustafa (Respondent No-5) and the appellant have been made within the administration ambit of the Higher Education Department, devoid of any ill intentions. As all administrative posts i-e, Principals of the colleges regularly get transferred in accordance with the APT Rules. The impugned notification is in accordance with law and rules.

- 7) Correct.  
8) Pertains to record.


2


**Grounds: -**

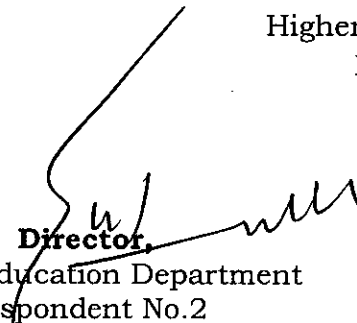
- a) Incorrect. That the order has been passed in accordance with laws/rules.  
b) Incorrect. All administrative posts i.e, Principal of the college get transferred in accordance with APT Rules. Opportunity of personal hearing is not a requirement under transfer policy of the Provincial Government.  
c) Incorrect. Transfer/Posting of the administrative posts i.e. Principal is made in the best public interest and in accordance with Section 10 of KP civil servant Act 1973.  
d) Incorrect as already explained in the preceding paras of facts and ground.  
e) Incorrect as already explained in the preceding paras of facts and ground.  
f) Incorrect as already explained in the preceding paras of facts and ground.  
g) Incorrect as already explained in the preceding paras of facts and ground.  
h) Incorrect as already explained in the preceding paras of facts and ground.  
i) Incorrect as already explained in the preceding paras of facts and ground.  
j) Incorrect as already explained in the preceding paras of facts and ground.  
k) Incorrect as already explained in the preceding paras of facts and ground.  
l) Incorrect. The competent person in the BPS-19 or 20 always posted on the administrative posts i.e. Principals having the quality of running a college.  
m) Incorrect. Posting/Transfer of BPS-19 and BPS-20 are made by the Establishment Department of the Provincial Government. Moreover, the Principal concerned is competent to appoint eligible candidate against the post of Class-IV being the head of the DSC in accordance with the other members of the DSC and the same appointments have been made by the appellant.  
n) Incorrect as explained in the preceding paras of facts and grounds.  
o) Needs no comments.  
p) That respondents may be allowed to raise additional grounds at the time of arguments.

**Prayers: -**

It is, therefore, humbly prayed that the instant service appeal is devoid of merit, hence may graciously be dismissed with appropriate costs.

  
**Chief Secretary,**  
Government of Khyber Pakhtunkhwa  
Respondent No. 03

  
**Secretary,**  
Higher Education Department  
Respondent No. 02

  
**Director,**  
Higher Education Department  
Respondent No.2

5/11/2018

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**CAMP COURT, ABBOTTABAD**

**Service Appeal No. 1129/2018**

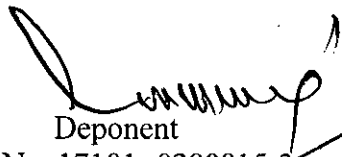
Syed Abdul Wajid..... (Appellant)

**VERSUS**

Govt. of Khyber Pakhtunkhwa through the worthy Secretary Higher Education, Archives & Libraries Department & Others..... (Respondents)

**AFFIDAVIT**

I, Khush Muhammad Khan, Section Officer (Litigation), Higher Education Department Government of Khyber Pakhtunkhwa, do hereby declare and affirm on oath, that the contents of the Para-wise Comments/Stay vacation application are correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

  
Deponent  
CNIC No. 17101- 0298815-3

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT ABBOTTABAD.**

S.A # 1129/2018  
Syed Abdul Wajid.....Appellant.

Versus

Govt. of Khyber Pakhtunkhwa  
Through Chief Secretary Khyber Pakhtunkhwa and  
Others..... Respondents

**SUBJECT: REPLY TO STAY APPLICATION ON BEHALF OF RESPONDENTS NO.  
1, 2 AND 3.**

**Respectfully Sheweth: -**

**Preliminary Objections: -**


1. That the appellant has got no cause of action/locus standi to file the instant Service appeal.
2. That the appellant has not come to the Honourable Tribunal with clean hands and is trying to conceal material facts.
3. That under section 10 of Civil Servant Act 1973, every civil servant is liable to be transferred anywhere in the Province or outside of the Province.
4. That the appeal in hand is hit by doctrine of laches.
5. That the appellant is estopped by his own conduct to file the instant service appeal.


**Facts: -**


- 1) Correct.
- 2) That parawise comments in the instant service appeal may kindly be treated as integral part of reply to stay application.
- 3) Incorrect. If the notification No. SO (E-I) E & AD/9-88/2017 dated 28/02/2018 is suspended/stayed, the department as well as other officers in the said notification will suffer irreparable loss.
- 4) Incorrect. The balance of convenience lies in favour of the respondents. Besides, the appellant has not good prima facie case before Honourable Tribunal.

**Prayers: -**

It is, therefore, humbly prayed that the application for stay is devoid of merit, hence may graciously be dismissed with appropriate costs.

  
**Chief Secretary,**  
 Government of Khyber Pakhtunkhwa  
 Respondent No. 03

  
**Secretary,**  
 Higher Education Department  
 Respondent No. 01

  
**Director,**  
 Higher Education Department  
 Respondent No.2

5/11/18

# وکالت نامہ

کورٹ فیس

بعدالت ضاں سہ ماہی ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ آباد

عنوان: سید عبدالواحد، مہم، نزد محکمہ زمین وراثت

مخاطب: مسیحاہ ٹینس عرس، 03005644133

نوعیت مقدمہ:

## باعث تحریر آنکھ

مقدمہ مندرجہ میں اپنی طرف سے واسطے جبری و حجاب دینی کل کارروائی متعلقہ آن مقام

عبدالکبیر ضاں ایڈووکیٹ ضاں کورٹ سٹریٹ منسہ نالہ

کو وکیل مقرر کر کے اقدام کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا لال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقررات و فیصلہ برحق دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کی کل یا کسی جبری کارروائی کے لئے کسی اور وکیل یا محامی صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی دینی اور دینی ہی اختیارات ہوں گے اور اس کا ساختہ پر داخلہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ الخوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز چارجم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی بھی مقام دورہ پر ہو یا عد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ جبری مقدمہ مذکورہ کریں اور اگر غلط مقرر کردہ میں کوئی جرم چلا ہو تو وکیل صاحب موصوف مقدمہ کی جبری کے پابند ہوں گے۔ نیز درخواست براد استجارت ہائش بیحدہ طلبی کے دائرہ کرنے اور اس کی جبری کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا گیا ہے۔

المقوم: 16/11/2019

بمقام: ایڈووکیٹ

المستفید

المستفید

دائرسہ عبدالکبیر ضاں ایڈووکیٹ ضاں کورٹ سٹریٹ منسہ نالہ

## Annex - A

S.No.	Name of Officers with Qualification	Date of Birth Domicile	Date of 1st Entry in to Govt. Service	1st Regular Appointment to the service/cadre			Regular/Promotion to the present post.			Remarks
				Date	BPS	Method of App:	Date	BPS	Mode of App:	
18	Mr. Noorus Saeed M.A Pol:Sc: GPGC, Nowshera	01.05.1959 Nowshera	29.01.1984	29.01.1984	17	PSC	13.05.2013	20	Promotion	
				08.09.2009	19	Prmotion				
19	Mr. Sharifullah M.A Pol: Sc: Principal GPGC, Bannu.	30.04.1959 Bannu	30.01.1984	30.01.1984	17	PSC	13.05.2013	20	Promotion	
				08.09.2009	19	Prmotion				
20	Mr.Saeed-ul-Haq M.Sc.Zoology.GPGC, Manshera	28.11.1963 Mansehra	11.11.1987	23.01.1988	17	PSC	13.05.2013	20	Promotion	
				26.05.2010	19	Prmotion				
21	Muhammad Sajjad Khan M.Sc.Chemsirty, Chairman BISE, Abbottabad	02.01.1963 Swabi	16.03.1991	16.03.1991	17	PSC	13.12.2013	20	Promotion	
				26.05.2010	19	Promotion				
22	Mr.Iltaf Hussain Khattak M.A.Poli:Sci:GPGC, Abbottabad	25.10.1959 Charsadda	10.06.1985	10.06.1985	17	PSC	13.12.2013	20	Promotion	
				26.05.2010	19	Promotion				
23	Mr.Rafiullah M.Sc.Physics, GC, Peshawar.	16.12.1960 Karak	21.10.1986	10.01.1987	17	PSC	13.12.2013	20	Promotion	
				26.05.2010	19	Promotion				
24	Mr.Anwarzeb Shah M.Sc Physics, GPGC, SWABI	07.05.1962 Swabi	21.10.1986	21.10.1986	17	PSC	13.12.2013	20	Promotion	
				26.05.2010	19	Promotion				
25	Mr. Sharif Gul M.A Economics, Principal GC, Peshswar	02.04.1961 Peshawar	11.11.1987	11.11.1987	17	PSC	13.12.2013	20	Promotion	
				26.05.2010	19	Promotion				
26	Mr.Manzoor Ali M.A Economics, GDC, No. 2 Mardan	25.02.1961 Swabi	08.09.1987	08.09.1987	17	PSC	13.12.2013	20	Promotion	
				26.05.2010	19	Promotion				
27	Mr.Mir Ghulam Khan M.Sc Biology,GPGC, Kohat.	01.12.1959 Karak	9.9.1987	20.02.1991			21.11.2014	20	Promotion	
				26.05.2010	19	Promotion				
28	Mr.Roshmali Khan M.Sc Maths GDC, Hangu	16.06.1962 Karak	03.11.1988	12.06.1990			21.11.2014	20	Promotion	
				26.05.2010	19	Promotion				
29	Mr.Rehmat Karim M.Sc Stats, G.C, Timergara	01.02.1963 Dir	13.10.1987	30.06.1990			21.11.2014	20	Promotion	
				26.05.2010	19	Promotion				
30	Mr.Nowsherawan M.Sc Stats, GDC, Mingora Swat	21.04.1959 Swat	26.10.1986	23.01.198			21.11.2014	20	Promotion	
				26.05.2010	19	Promotion				
31	Mr.Sher Bahadar Khan M.Sc Stats, Principal GDC, Khan Kohi (Nowshera)	28.04.1960 Peshawar	01.10.1989	01.10.1989			21.11.2014	20	Promotion	
				26.05.2010	19	Promotion				
32	Mr.Inayatpur Rehman M.A Islamiyat, GDC, Dargai	03.01.1965 Nowshera	18.09.1989	18.09.1989	26.5.2010	19	21.11.2014	20	Promotion	
				26.05.2010	19	Promotion				

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				Date	BPS	Method of App:	Date	BPS	Mode of App:	
33	Mr. Izhar Ul Haq M.A Arabic, Islamiyat, GPGC, Swabi	20.02.1961 Swabi	22.09.1985	22.09.1985 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
34	Mr. Hidayat Ullah M.A History, GDC, Domail (Bannu)	15.01.1965 Karak	03.11.1988	03.11.1988 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
35	Syed Abdul-Wajid M.Sc Chemistry, G.P/G.C, Mansehra	20.03.1964 Mansehra	08.12.1988	08.12.1988 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
36	Mr. S. Zulfiqar Haider M.Sc Botany, G.C, No. 1 D.I. Khan	01.04.1963 Tank	11.11.1987	11.11.1987 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
37	Mr. Rehmat Ullah M.A Pol: Science, GDC, Dargai	22.04.1959 Lakki Marwat	16.06.1985	16.06.1985 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
38	Muhammad Saddiq M.Sc Physics, Principal GDC, Badabar (Peshawar)	15.03.1963 Peshawar	09.06.1988	09.06.1988 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
39	Mr. Abdul Jabbar M.Sc Botany, Principal GPGC, Charsadda	17.04.1961 Peshawar	11.11.1987	23.10.1988 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
40	Mr. Falak Naz Khan M.A Economics, GPGC, Lakki Marwat	15.09.1964 Lakki Marwat	08.12.1988	08.12.1988 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
41	Mr. S. Altaf Haidar M.A English, Principal GDC, Takht Bahi Mardan	13.07.1961 Mardan	12.10.1987	01.10.1989 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
42	Mr. Rehmat Ali M.Sc Zoology, Principal GDC, Matta (Swat)	02.04.1960 Swat	20.06.1990	20.06.1990 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
43	Mr. Irshad Ahmad M.Phil Economics Principal Akorra Khattak	02.05.1964 Swabi	01.09.1990	25.05.1999 26.05.2010	19	Promotion	21.11.2014	20	Promotion	
44	Muhammad Tariq Saddique M.Sc Computer Sc: GSSC, Peshawar	08.06.1964 Peshawar	01.07.1990	01.07.1990 26.05.2010	19	Promotion	21.11.2014	20	Promotion	