

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 56/2022

Mr. Ikram Ullah..... Appellant

Versus

Govt. of Khyber Pakhtunkhwa
Through Secretary, Higher Education
& others.....

Respondents

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Respondent

BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal # 56/2022

Ikramullah.....Appellant

Versus

Khyber Pakhtunkhwa
Service Tribunal

Govt. of Khyber Pakhtunkhwa
Through Chief Secretary
& others.....

Diary No 2431

Dated 22/12/22 Respondents

SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 to 4

Respectfully Sheweth:-

Preliminary Objections:-

1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant is trying to conceal material facts.
4. That the appellant is estopped by his own conduct to file the instant service appeal.
5. That the instant Service Appeal is time-barred.
6. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.

Reply on Facts:-

1. Incorrect. The appellant was appointed on contract basis on 28-10-2005 and later on regularized. The appellant has worked with the utter dissatisfaction of the high-ups which is also evident from his relieving chit wherein he was relieved in Absentia by the Principal Govt. Degree College, Khanpur (Haripur) with the remarks to return the college assets (**Annex-A**) which he took to his home.
2. Correct to the extent that the appellant was transferred to Govt. Degree College Khankohi Nowshera under report.
3. Subject to proof. That the appellant was involved in different conspiracies against the Principal, violated the rules. An inquiry was also conducted wherein allegations against the Principal were not proved (**Annex-B**).

- 2
4. Incorrect. That the adverse remarks have been given to the appellant for the year 2016, 2017 & 2018, which clearly shows his performance and attitude towards his high-ups (**Annex-C**).
 5. Incorrect. That the Adverse remarks were communicated to the appellant vide letter dated: 09/12/2019 (**Annex-D**), against which the appellant filed departmental appeal on 01/01/2020 (**Annex-E**) which was regretted vide letter dated: 21/09/2020 (**Annex-F**) and also directions were issued to recover the salaries of the absence period as he was absent from duty during the said period as evident from Biometric record (**Annex-G**)
 6. Correct to the extent that he submitted another departmental appeal against letter dated: 21-09-2020 which was regretted vide letter dated: 12/11/2021. (**Annex-H**)
 7. Needs no Comments.


Reply on Grounds: -


- A. Incorrect. That the orders are in accordance with Law/rules as already explained.
- B. Incorrect. That the appellant was habitual of absenteeism, motivating students against Principal, late coming, not attending the college meetings, not marking biometric attendance (**Annex-I**) hence, overall performance and behaviour was not satisfactory and in this regard the Principal called explanation from the appellant vide letter dated: 27-10-2016, (**Annex-J**), letter dated: 07-11-2016 (**Annex-K**), letter dated 16-11-2016 (**Annex-L**), letter dated: 24-11-2016 (**Annex-M**) letter dated: 23-01-2017 (**Annex-N**), but the appellant did not pay any heed and continue his activities and behaviour. The appellant did press conference against the Principal (**Annex-O**) in utter violation of Conduct Rules, 1987, an explanation was also called from him in this regard (**Annex-P**).
An Inquiry was also conducted wherein allegations against the Principal did not prove and the committee recommended to transfer the appellant along with those who were disturbing the atmosphere of the college and also recommended that disciplinary proceedings be initiated against the persons involved in such activities. (**Attached as Annex-B**)
- C. Incorrect. That the appellant was intentionally involved in activities to disturb the atmosphere of the college and create problem for administration. In this regard explanations were called from the appellant and inquiries were also conducted in which penalty was also imposed upon the appellant but he did not mend his ways.
- D. Incorrect. As already explained in preceding paras and all the explanations are also attached but the appellant is just trying to mislead the Hon'ble Tribunal.


- E. Incorrect. As already explained in preceding Paras.
- F. Incorrect. As already explained in preceding paras.
- G. That the respondents may be allowed to raise additional grounds at the time of arguments.

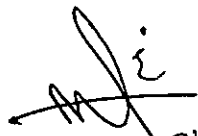
Prayer:-

It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/misstatements hence may graciously be dismissed.

for 
Chief Secretary,
 Govt. of Khyber Pakhtunkhwa
 Respondent No. 01


Secretary,
 Higher Education, Archives
 & Library Department
 Respondent No. 02


Director
 Higher Education Department
 Respondent No. 03


Principal
 Govt. Degree College, Khan Koh, Nowshera,
 Respondent No. 04
 Govt. Degree College
 Khan Koh, Nowshera,
 Khyber Pakhtunkhwa

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 56/2022

Mr. Ikram Ullah..... Appellant

Versus

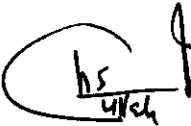
Govt. of Khyber Pakhtunkhwa
Through Secretary, Higher Education
& others.....

Respondents

AFFIDAVIT

I, Ihsan Ullah Khan, Litigation Officer, Higher Education Department do hereby declare and affirm on oath that the contents of "Parawise Comments" are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Identified by:



Deponent

ATTESTED



22-12-2022

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Annex-A

Annex-A

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHANPUR (HARIPUR)

Dated Khanpur the 4-8-2015

No. _____

To
Mr. Ikramullah Khan
Lecturer in Pashto
GDC Khanpur.

Subject: Relieving in absentia.

Reference: Directorate Higher Education Department Peshawar, letter No. SO (C-II) HE/2-5/15/Surplus Staff. You have been transferred to Khanpur in the best public interest.

You are therefore, directed to return (Almirah, Chairs, Clocks, Tables, Fans) that you have taken out for your personal use, immediately.

Principal
Govt. Degree College
Khanpur (Haripur)

Encl: No. 1584-56

Copy to the:

1. P.S. to Secretary, Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
3. Principal, GDC Khanpur, Nizampur.

Attested

Signature

Principal
Govt. Degree College
Khanpur (Haripur)

Annex B

Annex-B

10-6-2017
168

FACT FINDING INQUIRY REPORT ON
COMPLAINTS AGAINST SHER BAHADAR KHAN
PRINCIPAL GOVERNMENT DEGREE COLLEGE KHAN KHOI
(NIZAMPUR, NOWSHERA)

Reference:

Two letters of same subject received from the Director of Higher Education, Khyber Pakhtunkhwa regarding complaints against Prof: Sher Bahadar principal GDC Khan Khoi, Nizampur bearing numbers and dates as follows:

- i) 2751/CA-II/Estt: Branch/A-12/Sher Bahadar/Stats dated 01/02/2017 and
- ii) 3378/CA-II/Estt: Branch/A-12/Sher Bahadar/Stats dated 07/02/2017

Introduction:

The first letter relates to No. 34/5/3747/(CVC)NAB/(KP)2263, dated 29.07.2016 from Deputy Director (Coordination) complaints verification cell National Accountability Bureau, Khyber Pakhtunkhwa received in DIFE office through SO(Colleges-I), Govt: of KP, Higher Education Deptt: Peshawar.

The second letter relates to letter No. SO (College-I)/H/E/1-17/complaint/Principal GDC, Khan Kohi/2017/2070, dated 26/01/2017. Both the letters received on 15/02/2017. So, the inquiry conducted on the basis of both the complaints by taking Interviews and written statements.

The first letter consisted of the pages on different allegations briefed as

- i) Pages 205-206, an anonymous application (along with two office Orders of fines) to DG NAB, KP about corruptions of Prof: Sher Bahadar Principal, GDC Khan Khoi, Nizampur.
- ii) Page 98 of 110 with an enclosure of two pages application (page 232 & 236) of students regarding behavior of Principal.
- iii) Page 235(1-2) an application of Mr, Ikram Ullah lecturer in Pashto.
- iv) Page 221, an application by Prof: Abid Hussain of Statistics and Mr. Ikram Ullah lect. in Pashto.
- v) Page 328, an application of Mian Ikram ullah lect. in Pashto.

The second letter refers to page 147 of 147 with an enclosure of 05 pages regarding an incident of quarrel between principal and Mr. Ikram Ullah, Abid Hussain and Qazi Shehzad of Biology.

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Inquiry Proceedings:

The inquiry committee contacted Prof. Sher Bahadar telephonically & informed him about the visit of undersigned on 21/02/2017. The inquiry committee arranged to visit the college on specified date and tried to probe into the allegations leveled on the principal GDC Khan Kh...

I. Inquiry No. 2751/CA-II/Est. Branch/A-12/Sher Bahadar/Statistic:

Probing into the facts behind an anonymous application written to Mr. Saleem Shahzad Director General NAB, KP. The principal Sher Bahadar and the public representatives were contacted and inquired about the irregularities pointed out in the application. It is worth mentioning that on the same application an inquiry has already been conducted by Prof. Fazal ur Rehman and Mr. Muhammad Hayat Deputy Secretary Higher Education Deptt. The difference is that in that inquiry, fake names of persons who had no relation with the college/students were written while this, one is anonymous. However, the undersigned met with some public representatives. They flatly denied the charges of corruption on the principal. Their statement is annexed as, annexure A(02 pages).

Other charges are discussed one by one as follows:

1. The Principal was inquired about his post, he showed a notification by the Govt. for his personal up gradation of the post i.e., the post will be automatically downgraded with the relieving of Prof. Sher Bahadar. The DAO Nowshera makes payment according to the Govt. orders. Annexure B (03 pages).
2. The Principal, Sher Bahadar informed that prior to his arrival in that college, the transformer of the college was stolen by some thieves which is still untraced. He personally requested to the local nobilities to help the College Administration to install the Electric Transformer so that the students could study with quite peace of mind having light, cool air of fans and water. One of the philanthropists Mr. Ghaffar Khattak personally deposited a sum of Rs. 275,000/- with WAPDA for provision of a Transformer to the College. In this way he made the college tube well functional and the college buildings enlightened. Same was confirmed by the local representatives (annex A). On 20/11/2015 he arranged his parent day function in which the administration of Askri cement was also invited. The Manager of Askri Cement impressed from the performance of students and announced a prize of Rs. 20,000/- for the students and handed over a cheque of above amount. This cheque was deposited by Prof. Abid Hussain in the college account.

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Other than these, no donation was received by the Principal nor given by any other organization.

3. The Principal accepted that he had lived for about one month in the two room accommodation constructed at the remote corner of the college, whereas, now-a-days he stays off and on for the night whenever remain busy in college affairs in the chowkidar's room constructed over the main building of the college. Furthermore, the light system of the chowkidar's room is connected with the solar system of the college so no payment of electricity bill is involved.
4. The Principal denied of renting out the college HIACE on marriages. The allegation is false and baseless. This question was also asked from the staff of the college who also negated. The local public representatives also negated such activities (annexure 4)
5. The Principal accepted that the barren and uneven part of the college land was given to a local villager during 2014, just to level it and make it cultivable. The villager after having cultivated it for wheat from which the total output was about 2-3 months. After that the same area was converted to a flower garden and some other plants have been planted on that area.
6. For the installation of security cameras and solar system, proper advertisement was given in the newspaper by the JMC Nowshera, tenders collected and order placed to the successful bidder. Since, it was the end of financial year. So, as per past practice the A/C bill was submitted to DA JMC Nowshera who issued the cheque in the name of vendor. The vendor during this period supplied some of the ordered items while others left over. However, the Principal demanded the Pay Order amounting to Rs. 500,000/- in addition to the CDR already submitted for the left over items as security with the assurance that the remaining items will be supplied in near future. According to principal he requested repeatedly in writing to the contractor for the supply completion but the supplier did not respond. The Principal submitted the CDRs/Pay Order to Bank of Khyber Nowshera Cantt. Branch and found that the same were fake. Accordingly, proper FIR against the Contractor was registered (photo copy attached). According to him he was deceived by the supplier and his supply is still pending. It is worth mentioning that the supplier deceived all the JMC colleges of Nowshera and the supplier has been blacklisted by the Coordinator/Principal JMC Nowshera with the consultation of Director, Higher Education Deptt.
7. The inquiry committee tried to trace out the students of Inter and Degree Classes, who were fined by the Principal/Chief Proctor but could not find any of the student's who could confirm the fine indicated in the office

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orders. In this respect, the Chief Proctor/Office assistant was also contacted but both of them denied imposing such heavy fines. The diary/dispatch register was also checked for the confirmation of Office Order Nos./dates of fine but proved to be fake (photocopies of dispatch register are attached). Furthermore, the Principal and Office Assistant asserted that those notices were fake and exaggerated, the signs of the Principal were scanned and such type of practices is informed to be made by the Lab. Asstt. Mr. Shabbir (now posted at GDC Okara). Annexure - D (05 pages).

The Principal explained that the college HIACE is being used to provide the pick and drop facility to the staff members as college is located in the remote area and generally there is no suitable local/public transport available during college hours.

P-232 To confirm the allegations in an application by the students about the behavior of Principal and the facilities of Play Grounds and cold drinking water, the inquiry committee tried to meet all the students in the attached list but no student appeared to accept the allegations leveled in the application. A few of the students were of the view that this application was written by Mr. Ikram Ullah, et al while a few of the enlisted students denied involvement of such an activity.

The undersigned met the students collectively/individually and inquired about the behavior of their Principal as well as teachers. In the gathering there were about 200 students of almost all the classes. Out of these no one objected the behavior of their Principal and other staff except on the teachers of Pashto, Statistics and Biology. All the students praised the Principal and said that "he is very good, cares about our studies and helps the poor ones from his own pocket. A few of them pointed out that at certain occasions he becomes harsh to those students who do not care for their studies". However, they thought that they were not annoyed of him as whatever he is doing that is for their best future. 11 statements of students are annexed as E (7 pages).

The students of Pashto explained that once Prof. Ikram Ullah gave them blank paper just to sign it but they did not know what was going to be written on it. According to them, they got information about that statement during their inquiries. They further stated that Mr. E. mullah Khan bears a casual behavior of attendance and most of the time he does not care for his classes. The students of Statistics also said that Prof. Abid Ullah is irregular in his classes and his students were not satisfied with his teaching method. He does not allow the students to ask questions. He guides the students not to opt the subject of statistics. Similarly, the students of Biology also stated that their teacher Mr. Qazi Shazad

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[Signature]

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...look does not take the classes regularly, often he is present in the College but
...id to take the classes. The statements of students are annexed as P-04 pages).

P-35. In this application, Mr. Ikram Ullah claimed the misbehaviour of the
Principal, but when inquired from the Principal he in turn claimed that he
requested Mr. Ikramullah to change the time of his class because of clash in
timings of Pashto and Islamiyat as there were only FIVE students in Pashto
whereas in Islamiyat there were about 30 students so the Principal thought it better
to change the time of Pashto subject from 11.00 am to 11.40 am. And when he
(Principal) discussed it with Mr. Ikramullah, he became furious and used abusive
language. This behavior was confirmed from the oral statements of students and
written statement of the staff members (copy attached).

P-21. When asked from the Principal about closing of College on 16.11.2016, he
denied of such an activity and said that it was a false allegation as the principal has
no authority to close the college without any justification or permission of the
higher authorities.

P-28. Application of Mr. Ikramullah about threatening of Principal when asked
about such an harassment, the Principal denied of it and said that the persons
pointed in the application is a group who is regularly trying to defame me by using
different tactics. The application given by Ikramullah is the handwriting of Mr.
Shabbir Ahmed (Lab Asstt.) who was transferred from GDC Khan Kohi to GDC
Alora Khattak due to his mischievous activities. The Principal also provided a list
of FIRs lodged against Mr. Shabbir Ahmed by different Principals at different
occasions. He is informed to be habitual of teasing and harassing Principals by
fake letters to the high ups. Here in this application he has signed as witness while
he has himself written the application in spite he is not serving in this college.

Similarly, the other witnesses who signed the application of Mr. Ikram Ullah i.e;

- (i) Prof: Abid Hussain
- (ii) Prof: Shchzad
- (iii) Mr. Ayub Zaman(Mali)
- (iv) Mr. Hafcez ur Rehman (Lab Attendent)

have been found from the attendance record to be irregular and reluctant of
performing their assigned duties. Mr. Ayub Zaman was once punished and
terminated by the Principal due to non performance of his duty and remaining
absent but later on re-instated.

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II. Inquiry No. 3378/CA-II/1-11: Branch/A-12/Sher Bahadar/Stats

P-150. Application by Mr. Ikramullah and Prof: Qazi Shahzad ul Malook.

According to the Principal, on 25.01.2017 the students of Pashto and Biology subjects complained about the incompleteness of their courses and irregular behavior of their teachers who do not take classes regularly and most of the courses were left pending. At the same time some more students gathered at the spot. The Principal said that he tried to calm down the students and instructed to be patient, he will talk to Mr. Ikramullah and Prof: Qazi Shahzad ul Malook for the same. In the mean time Mr. Ikramullah and Prof: Qazi Shahzad reached in the college and burst upon the students. They also used abusive language for the Principal. At this time harsh words were exchanged on both sides but the Chief Proctor and some other staff members entered in and tried to disperse the students and the professors.

The Chief Proctor and others strongly condemned the happening of this incident. They said that there was only an exchange of harsh words rather than beating to anyone. According to the Principal and others that after sometime Mr. Ikramullah, Qazi Shahzad, etc., went to nearby Police Station to file a complaint against the Principal.

Knowing such an activity by the above Professors the Principal along with some students who were present on the spot also went to the Police Station for a cross complaint and returned back to his office.

The staff members and the students said that the application by Mr. Ikramullah, etc; and the newspaper clippings were false and exaggeration of facts. The statement of Chief Proctor, other staff members and students are attached herewith. It is worth mentioning that both the groups have already approached to the local Police Station for FIRs on different occasions prior to this quarreling. Annexure G (11 pages).

The written statements of Prof: Abid Hussain, Prof: Qazi Shahzad ul Malook, Mr. Ikram ullah, Mr Ayub Zaman Mali and Mr. Hafecz ur Rehman Lab attendant are attached. These statements are more or less same with similar contents. Same type allegations were leveled over the principal.

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Findings:

After going through the records and statements provided by both the parties, it is found that the differences basically arose due to non-compliance of orders, non-serious and casual behaviour of subordinate staff. The basic requirement of a Principal is that his subordinate staff should perform his assigned duties especially taking regular classes and satisfy the students.

From the CCTV camera clippings it is found that the persons cross with the Principal are habitual of coming late to the college, remain absent without information and have casual behavior towards their duties. They have the attitude of giving anonymous applications to high ups with fake names. Also they have arranged press conferences which are against the service rules. They have been served with many explanations and warnings on account of being absent or not taking their classes. Once the differences created, they went on increasing, resulting in dis-obeyance and struggle to turn down one another. The inquiry committee noted that only five persons i.e: (i) Prof: Abid Hussain, (ii) Prof: Qazi Shazad Malook, (iii) Mr. Ikramullah, lecturer (iv) Mr. Hafeez ur Rehman, Lab Attendant and (v) Mr. Ayub Zaman, Mali were on one side while all the other teaching/non-teaching staff were on Principal side this indicate that the first group of 5 persons were at wrong. They have reached at a stage of non-return and unable to accept Prof: Sher Bahadar as Principal, who according to majority of staff, students and general public representatives was performing for the betterment of the college as well as students.

Furthermore, the students were found to be annoyed from the quarreling behavior of their teachers and non performance of their duties. There was not a single student who appreciated the behavior of these persons. They also requested that such under report teachers should be transferred from their college as they have given a huge loss in terms of time, money and resources to the students and the college.

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Recommendations:-

Since the above six persons have become a threat for the department as well as the college due to being habitual of not performing their duties, sending fake applications to high ups and other agencies with fake names and exaggerated facts just to keep the principal under pressure and avail full facilities from the department, also they have arranged the press conferences and defamed the department and wasted time and resources. It is therefore recommended that all the above persons be transferred from this college and disciplinary proceedings be initiated against the persons involved in such activities.

The principal of the college be warned to be careful in purchasing processes so that the fraudulent persons could not deceive again. Also, the department should take action against the fraudulent contractor and treat under the law so that the supplies could be completed.

It is also, recommended that the principal be directed not to use harsh and abusive language with the subordinate staff and treat them mannerly.

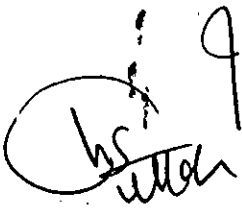


Prof. Muhammad Nawaz,
Principal GDC Khanpur, Haripur.



Asstt. Prof. Azhar Hussain Shah
GDC Khanpur, Haripur.

Attested




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**PER GRADING SYNOPSIS/QUANTIFICATION FORM IN RESPECT OF
MR. Ikramullah Assistant Professor of Pashto**

01.02.1967

Year	Period of PER		Pen Picture		PERs Assessment	Fitness for Promotion
	From	To	Reporting Officer	Countersigning Officer		
Scale B-17						
2009	24.9.2009	31.12.2009	Well behaved and efficient officer and a very good colleague to work with.		Agreed with R.O.	V.Good Fit
2010	1.1.2010	31.12.2010	He is recently regularized and is new in the field, will improve slowly.		Agreed with R.O.	Good Fit
2011	1.1.2011	31.12.2011	A man of strength both physically and psychologically can face difficult situations.		Agreed with R.O.	Good Fit
2012	1.1.2012	31.12.2012	Dependable, social, polite, can face problems.		Agreed with R.O.	Good Fit
2013	1.1.2013	31.12.2013	He is fairly, well behaved and well dressed officer. He takes keen interest in the college affairs and wants to do something good for the college.		Agreed with R.O.	Good Fit
2014	1.1.2014	31.12.2014	The officer is a sincere man, positive attitude, well behaved and hardworking.		Agreed with R.O.	V.Good Fit
2015	1.1.2015	31.12.2015	Reliable, confident, dependable. Have the ability that face any type of problem.		Agreed with R.O.	Good Fit
2016	1.1.2016	31.12.2016	Not trustible, financially dishonest, not dutiful, unreliable, always disgrace seniors, misbehaviour to each and everyone. No ability to routine work. No competency in the subject, disobedient.		ADVERSE CONVEYED/ Not Expunged	B.Average Unlikely to progress further
2017	1.1.2017	31.12.2017	Dull person. He repeated the same practices as like in GDC, Shabqadar, GDC, Khan Kohi.		ADVERSE CONVEYED/ Not Expunged	B.Average Unlikely to progress further
2018	1.1.2018	17.4.2018	Not dependable. He always creat problems of administration in one way or others.		ADVERSE CONVEYED/ Not Expunged	B.Average Unlikely to progress further
	18.4.2018	31.12.2018	Hardworking teacher and devoted to his job.		Agreed with R.O.	Good Fit
2019	1.1.2019	31.12.2019	The officer posses qualities of a good teacher. He can work in any situation he is for for promotion.		Agreed with R.O.	V.Good Fit
Present Scale BPS-18						
2020	1.1.2020	31.12.2020	He has good command over his subject.		Agreed with R.O.	V.Good Fit
2021	1.1.2021	31.12.2021	The officer has excellent managerial qualities. He is devoted and dedicated teacher.		Agreed with R.O.	Good Fit


 Director Higher Education
 Khyber Pakhtunkhwa
 Khyber Road Peshawar.

Office No. 28613 /AD(ACR)Dated: 9/1/2019Mr. Ikramullah

I am directed to convey to you the following adverse remarks recorded in your Performance Evaluation Report for the period from 01.01.2018 to 18.04.2018.

PART-IV (REPORTING OFFICER EVALUATION)

1. Please comment on the officer's performance on the job given in part II (2) with special reference to knowledge of work, quality and quantity of output. How far was the officer able to achieve targets? Do you what has been stated in part II (2)
Not Agreed Mr. ikramullah is a Pashto lecturer but does not know the spelling of Pashto. The result of 2018 is attached. Although it is submitted by Ex-principal MKr. Nisar.
2. Integrity.
Dishonest Person.
3. Picture.
Not dependable. He always create problems to Administration in one way or others.
4. Special aptitude.
Nil.
5. Recommendation for future training.
Not recommended for future training.
6. Overall Grading.
Below Average.
7. Fitness for Promotion.
Unlikely to progress further.

I hope you will try your best to remove these defects. One spare copy of this D.O. letter is enclosed. This may be signed and returned to this office for placement in your Character Roll. Please note that nothing is to be written on it except merely putting your signature and dates in token of having received this letter. In case the acknowledgement is not received in this office within a week, it will be presumed that you have accepted the remarks and no appeal will be entertained after the specified time.

o/c
ASSISTANT DIRECTRESS (ACR)

Mr. Ikramullah
Lecturer in Pashto
GDC, Kalaya (Dist: Orakzai).

Endst; No. 28614-1

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

1. The Principal GPGC, Landi Kotal
2. A.C. Local Directorate.

o/c
ASSISTANT DIRECTRESS (ACR)

E

To

The Director,
Higher education Khyber Pakhtunkhwa
Peshawar.

Subject: REPLY TO THE ADVERSE REMARKS IN THE PER PERIOD FROM 01/01/2018 TO 18/04/2019.

R/Sir,

Reference to your letter endst: No 28614-15 dated 09/12/2019, it is hereby stated that the undersigned has performed his duties to the best of his abilities and even served under the principal ship of Professor Sher Bahadur Khan Principal GPGC Landi Kotal and got PERs of the year 2013 at GDC Khanpur, Haripur and 2015 at GDC Khan Kohi, Nizampur (Nowshera) with satisfactory and good remarks. It is further stated that the said principal is a corrupt, immoral, cruel and a harsh person. He has tortured a number of his subordinates during his service. He was also involved in corruption and immoral activities. He was trying to pressurize the staff members to support him in their illegal deeds/actions. He also used abusive language against the staff members.

It has come to my knowledge through a reliable source that he has continued the same practice at GPGC Landi Kotal District Khyber.

Mean while professor Sher Bahadur Khan developed miss understanding with the undersigned and started teasing him with one way or the other.

Due to this inhuman and immoral nature/behavior a number of complaints are recorded against him in various departments

(Copies are attached).

According to a departmental audit report Endst: No 5314/ P-7/ A dated Peshawar 25/03/2019. Serious audit paras of 10.6 million were made against him.

(Copy attached).

About his corruption, inhuman nature, and immoral attitude news were published in different newspapers also.

(Copies attached).

As a member of the college council when I did not support him in the above mentioned activities, he started torturing me in one way or the other. In this regard he submitted an application No 2586 dated 27/11/2016 in the police station Nizampure for registering FIR against me which was rejected by the concerned SHO.

(Copy attached).

He also submitted another application for lodging FIR in the honorable court of session judge / Justice of peace district Nowshera, under clause 22-A Cr. P.C without taking any advice, directive and NOC form the competent authorities/ups.

(Copy attached).

The above illegal and unlawful acts of Professor Sher Bahadur Khan are sufficient to prove his malafide and bias intention towards the undersigned.

It is pertinent to mention here that he also tried to pressurize, torture and blackmail us through his relatives and outsiders.

ACR
RECEIVED ON
1 - JAN 2020
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Attested

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ART. 14 (REPORTING OFFICER EVALAVATION)

Part II (2)

The reporting officer's comments are baseless and biased. I have fulfilled my duties honestly and with dedication. In this regard you can check my results though out my service.

Integrity:

In this PER he has declared that He is not an honest person while in PER 2013 and 2015 he has declared me as an honest person. This discrepancy shows that the fault lies in his mind not in me.

Pen Picture :

Completely biased and prejudice.
The reporting officer himself is not dependable. He has always created problems for the administration.
In this regard under notification No. SO(C-1) / HE/1-2/ summary for CM/ 2016/Sher Bahadar dated 29/05/2019, a minor penalty of withholding of two increments for two years is imposed.

(Copy attached)

Special Aptitude:

Again his attitude is found prejudice and my other PERs of year 2013 and 2015 reported by him can be coated in this regard.

Recommendation for future training:

Here too he has shown his narrow mindedness. I have got the opportunity of mandatory training in the HEART by getting a certificate with good remarks.

Overall grading:

It is totally bias. His previous remarks in my PERs can be checked.

Fitness for promotion

Totally bias and his remarks in my previous PERs are sufficient.

Thanks and anticipation

Dated: 01/01/2020

Yours sincerely

Ikram Ullah lecturer in Pashto
GDC Kalaya district Orakzai

Attested

HS Ullah 9



Annex - F
GOVT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

No. SO (C-II)HED/12-16/2018/ACR/PER/Ikramullah/Pashto
Dated Peshawar the, 21.09.2020.

366
ACR

To

The Director,
Higher Education Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: - ADVERSE PER FOR THE YEAR 01.01.2018 to 18.04.2018 IN
R/O OF IKRAMULLAH LECTURER IN PASHTO

I am directed to refer to your letter No. 787/ AD (ACR) dated 11.02.2020 on the subject noted and to state that this Department regrets its inability to expunge the adverse remarks in the PER of Mr. Ikramullah, lecturer in Pashto for the calendar year 2018, Govt Degree College, Khan Kohi Nizampur, Nowshera as he remained absent for most of the period.

I am further directed to request that the salaries drawn during the absence period may also be recovered from the officer.

Encl: ACRs in original through special messenger

(TAHIR KHAN)
SECTION OFFICER (COLLEGES-II)

ndst; No. 16863-67

Copy forwarded for information to:

1. P.A to Director Higher Education Department KP Peshawar.
2. Deputy Director (Establishment Male) Local Directorate.
3. Assistant Director (Litigation) Local Directorate.
4. Principal, GDC, Kalaya.
5. Mr. Ikramullah Lecturer of Pashto GDC, Kalaya.

ASSISTANT DIRECTRESS (ACR)

Attested

Chs attached

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Attendance Management System

Home (home.aspx) > Attendance (Report_Employee_Attendance_Status_Report_(Individual).aspx) >
Employee Attendance Status Report (Individual)

Employee Attendance Status Report (Individual)

- Home (home.aspx)
- Dashboard
- Attendance Management
- Manual Attendance
- Leave Management
- Time Management
- Report Section
- Setup
- User Management
- Discussions
- Logs (Detail_log.aspx)

Select College/Office: OTHER COLLEGE (Bio-metric Facility do...
Employee: Ikram Ullah
From Date: 01/01/2018
To Date: 04/30/2018



Higher Education, Archives and Libraries Department
Government of Khyber Pakhtunkhwa

Employee Attendance Report (Individual) (Friday, January 31)

Print Report

Summary:

- Name: Ikram Ullah
- CNIC: 2110519953145
- Gender: Male
- FP.ID: 14223

Attested

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Ullah

6. Scale : BPS-17
7. Department: OTHER COLLEGE (Bio-metric Facility does not Exist)
8. Shift : Working Shift (Non - Local) In Time 08:30:00 ,Out Time: 14:30:00 ,Grace Time: 09:00:59

S.No	Attendance Date	Day	In Time	Out Time	Status
1	01/01/2018	Monday	--	--	Absent
2	01/02/2018	Tuesday	--	--	Absent
3	01/03/2018	Wednesday	--	--	Absent
4	01/04/2018	Thursday	--	--	Absent
5	01/05/2018	Friday	--	--	Absent
6	01/06/2018	Saturday	--	--	Week-Holiday
7	01/07/2018	Sunday	--	--	Absent
8	01/08/2018	Monday	--	--	Absent
9	01/09/2018	Tuesday	--	--	Absent
10	01/10/2018	Wednesday	--	--	Absent
11	01/11/2018	Thursday	--	--	Absent
12	01/12/2018	Friday	--	--	Absent
13	01/13/2018	Saturday	--	--	Week-Holiday
14	01/14/2018	Sunday	--	--	Absent
15	01/15/2018	Monday	--	--	Absent
16	01/16/2018	Tuesday	--	--	Absent
17	01/17/2018	Wednesday	--	--	Absent
18	01/18/2018	Thursday	--	--	Absent
19	01/19/2018	Friday	--	--	Absent
20	01/20/2018	Saturday	--	--	Week-Holiday

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23	01/23/2018	Tuesday	--	--	Absent
24	01/24/2018	Wednesday	--	--	Absent
25	01/25/2018	Thursday	--	--	Absent
26	01/26/2018	Friday	--	--	Absent
27	01/27/2018	Saturday	--	--	Absent
28	01/28/2018	Sunday	--	--	Week-Holiday
29	01/29/2018	Monday	--	--	Absent
30	01/30/2018	Tuesday	--	--	Absent
31	01/31/2018	Wednesday	--	--	Absent
32	02/01/2018	Thursday	--	--	Absent
33	02/02/2018	Friday	--	--	Absent
34	02/03/2018	Saturday	--	--	Absent
35	02/04/2018	Sunday	--	--	Week-Holiday
36	02/05/2018	Monday	--	--	Absent
37	02/06/2018	Tuesday	--	--	Absent
38	02/07/2018	Wednesday	--	--	Absent
39	02/08/2018	Thursday	--	--	Absent
40	02/09/2018	Friday	--	--	Absent
41	02/10/2018	Saturday	--	--	Absent
42	02/11/2018	Sunday	--	--	Week-Holiday
43	02/12/2018	Monday	--	--	Absent
44	02/13/2018	Tuesday	--	--	Absent
45	02/14/2018	Wednesday	--	--	Absent
46	02/15/2018	Thursday	--	--	Absent
47	02/16/2018	Friday	--	--	Absent
48	02/17/2018	Saturday	--	--	Absent
49	02/18/2018	Sunday	--	--	Week-Holiday

Attested

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52	02/21/2018	Wednesday	Absent
53	02/22/2018	Thursday	Absent
54	02/23/2018	Friday	Absent
55	02/24/2018	Saturday	Absent
56	02/25/2018	Sunday	Week-Holiday
57	02/26/2018	Monday	Absent
58	02/27/2018	Tuesday	Absent
59	02/28/2018	Wednesday	Absent
60	03/01/2018	Thursday	Absent
61	03/02/2018	Friday	Absent
62	03/03/2018	Saturday	Absent
63	03/04/2018	Sunday	Week-Holiday
64	03/05/2018	Monday	Absent
65	03/06/2018	Tuesday	Absent
66	03/07/2018	Wednesday	Absent
67	03/08/2018	Thursday	Absent
68	03/09/2018	Friday	Absent
69	03/10/2018	Saturday	Absent
70	03/11/2018	Sunday	Week-Holiday
71	03/12/2018	Monday	Absent
72	03/13/2018	Tuesday	Absent
73	03/14/2018	Wednesday	Absent
74	03/15/2018	Thursday	Absent
75	03/16/2018	Friday	Absent
76	03/17/2018	Saturday	Absent
77	03/18/2018	Sunday	Week-Holiday
78	03/19/2018	Monday	Absent

81	03/22/2018	Thursday	--	--	Absent
82	03/23/2018	Friday	--	--	Absent
83	03/24/2018	Saturday	--	--	Absent
84	03/25/2018	Sunday	--	--	Week-Holiday
85	03/26/2018	Monday	--	--	Absent
86	03/27/2018	Tuesday	--	--	Absent
87	03/28/2018	Wednesday	--	--	Absent
88	03/29/2018	Thursday	--	--	Absent
89	03/30/2018	Friday	--	--	Absent
90	03/31/2018	Saturday	--	--	Absent
91	04/01/2018	Sunday	--	--	Week-Holiday
92	04/02/2018	Monday	--	--	Absent
93	04/03/2018	Tuesday	--	--	Absent
94	04/04/2018	Wednesday	--	--	Absent
95	04/05/2018	Thursday	--	--	Absent
96	04/06/2018	Friday	--	--	Absent
97	04/07/2018	Saturday	--	--	Absent
98	04/08/2018	Sunday	--	--	Week-Holiday
99	04/09/2018	Monday	--	--	Absent
100	04/10/2018	Tuesday	--	--	Absent
101	04/11/2018	Wednesday	--	--	Absent
102	04/12/2018	Thursday	--	--	Absent
103	04/13/2018	Friday	--	--	Absent
104	04/14/2018	Saturday	--	--	Absent
105	04/15/2018	Sunday	--	--	Week-Holiday
106	04/16/2018	Monday	--	--	Absent
107	04/17/2018	Tuesday	11:50 AM	MTO	Present

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Attested

[Signature]

110	04/20/2018	Friday	--	--	Absent	(B)
111	04/21/2018	Saturday	--	--	Absent	
112	04/22/2018	Sunday	--	--	Week-Holiday	
113	04/23/2018	Monday	10:17 AM		Present	
114	04/24/2018	Tuesday	9:51 AM	MTO	Present	
115	04/25/2018	Wednesday	--	--	Absent	
116	04/26/2018	Thursday	--	--	Absent	
117	04/27/2018	Friday	10:07 AM	MTO	Present	
118	04/28/2018	Saturday	10:09 AM	12:58 PM	Present	
119	04/29/2018	Sunday	--	--	Week-Holiday	
120	04/30/2018	Monday	--	--	Absent	

Attested

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[Handwritten signature]



**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

o.SO(C-II)/HED/12-16/2021/Ikramullah
Dated Peshawar the 12th November, 2021

The Director,
Higher Education Khyber Pakhtunkhwa,
Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ADVERSE REMARKS IN THE
PER OF 01-01-2016 TO 15-04-2018 PASSED BY THE REPORTING
OFFICER AS WELL AS RECOVERY OF SALARY.**

I am directed to refer to your letter No.4649/CA-II/Estt: Branch/A-12/Ikramullah/Pashto dated 01.09.2021 on the subject noted above and to state that the Departmental appeal against adverse remarks in the PER submitted by Mr. Ikramullah Khan Assistant Professor of Pashto Govt. Degree College Khanpur, Khanpur has been examined/processed and regretted by the Competent Authority. The Assistant Professor concerned may be informed accordingly, please.

[Signature]
SECTION OFFICER (COLLEGES-II)

ENDST: NO. & DATE EVEN.

Copy is forwarded to the PS to Secretary, Higher Education Department.

Attested

SECTION OFFICER (COLLEGES-II)

CA-II A

26/11/2021 AD (ACK)

*Mr. Ikramullah Khan
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please
to the concerned
10/12/2021*

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Higher Education, Archives and Libraries Department
Government of Khyber Pakhtunkhwa

Employee Attendance Report (Individual) (Friday, January 20)

Secretary :

- 1. Name: Ikram Ullah
- 2. CNIC: 2110519953145
- 3. Gender: Male
- 4. FPID: 14223
- 5. Designation: Lecturer
- 6. Scale: BPS-17
- 7. Department: GDC Khan Kohi Nizampur, Nowshera
- 8. Shift: In Time: ,Out Time: ,Grace Time:

S.No.	Attendance Date	Day	In Time	Out Time	Status
1	12/01/2016	Thursday	--	--	Absent
2	12/02/2016	Friday	--	--	Absent
3	12/03/2016	Saturday	--	--	Absent
4	12/04/2016	Sunday	--	--	Week-Holiday
5	12/05/2016	Monday	--	--	Absent
6	12/06/2016	Tuesday	--	--	Absent
7	12/07/2016	Wednesday	--	--	Absent
8	12/08/2016	Thursday	--	--	Absent
9	12/09/2016	Friday	--	--	Absent
10	12/10/2016	Saturday	--	--	Absent
11	12/11/2016	Sunday	--	--	Week-Holiday
12	12/12/2016	Monday	--	--	Eid e Milad Un NABI
13	12/13/2016	Tuesday	--	--	Absent
14	12/14/2016	Wednesday	--	--	Absent
15	12/15/2016	Thursday	--	--	Absent
16	12/16/2016	Friday	--	--	Absent
17	12/17/2016	Saturday	--	--	Absent
18	12/18/2016	Sunday	--	--	Week-Holiday
19	12/19/2016	Monday	--	--	Absent
20	12/20/2016	Tuesday	--	--	Absent
21	12/21/2016	Wednesday	--	--	Absent
22	12/22/2016	Thursday	--	--	Absent
23	12/23/2016	Friday	--	--	Absent
24	12/24/2016	Saturday	--	--	Absent
25	12/25/2016	Sunday	--	--	Week-Holiday
26	12/25/2016	Sunday	--	--	Quaid's Day
27	12/26/2016	Monday	--	--	Absent
28	12/27/2016	Tuesday	--	--	Absent
29	12/28/2016	Wednesday	--	--	Absent
30	12/29/2016	Thursday	--	--	Absent
31	12/30/2016	Friday	--	--	Absent

Attested

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OFFICE OF THE PRINCIPAL GOVT DEGREE COLLEGE KHAN KOHL

NIZAMPUR, NOWSHERA.

Dated: 27-10-2016

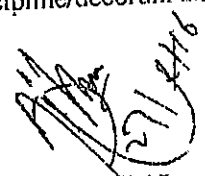
No.: 2612

To: Mr. Ikram Ullah
Lecturer in Pashto
Govt. Degree College Khan Kohli Nizampur, Nowshera.

- Subject: Explanation.**
1. That you absent from duty on 27-10-2016 without prior information/ sanctioning casual leave.
 2. That you are always engaging to motivate student against the administration: specially to block the main road of Nizampur.
 3. That you misbehaved and used harsh language with Mr. Rafaqat Ali Khan Lecturer in Maths on 26-10-2016. In his presence, you started delivering lecture on such points which are not in the mind of students, where you deliberately discussed.
 4. That you motivated the students to write a letter to Nazam of village council Kahi the English teacher is not available. There is no such problem of English teacher.
 5. That you are not executing his duty regularly.
 6. That you availed 35-day Casual leave from January, 2016 till to date.
 7. That you come at 10.00am to college which is against the office discipline and decorum.
 8. That your manner is disgusted towards his senior/Principal, and lower staff.
 9. That you misbehaved with his mere presence of Class IV.
 10. That you with Mr. Abid Hussain Associate Professor and Mr. Ayub Zaman of this college have formed a pressure group and plotting conspiracies against the college Administration.
 11. You always submit leave application, state that I am suffering from fever and head ache or high blood pressure. In this way you create a major trouble.

In this regard it is stated that this state of affairs is not at all tolerable and would also encourage other employees to follow similar attitudes. Therefore, we are in no position to spare such ill-discipline and unpunctual professor in the department, whose main task is violation of discipline/decorum and Govt. Servant (E&D) Rules.

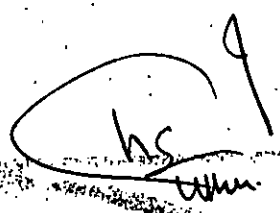
Explain your position with in three days positively.



**PRINCIPAL,
GOVT. DEGREE COLLEGE,
KHAN KOHL (NIZAMPUR),
NOWSHERA.**

Copy to: 1. P.S. to Secretary, Higher Education KPK Peshawar.
2. P.A. Director, Higher Education KPK Peshawar.

Attested



o/c

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOHI
NIZAMPUR, NOWSHERA.

Dated: 07-11-2016

No: 2630

To:

Mr. Ikram Ullah
Lecturer in Pashto
Govt. Degree College Khan Kohi Nizampur, Nowshera.

Subject:

Explanation.

1. That you absent from duty on 05-11-2016 without prior information/ sanctioning causal leave.
 2. That you reached college at 10.45 AM on 07-11-2016.
 3. That you forced the students to write a letter to Local Councilers and also Secretary and Director Higher Education KPK Peshawar by bribing them in shape of cash money.
 4. That you compel the students to go to Peshawar press club for protest against the principal.
 5. That you are not taking class of first year according time table.
 6. That you are not taking interest in college co-curriculum activities.
 7. That you are not attending the meeting of the college calling by principal.
 8. That you have not signed the student attendance register uptill now.
 9. That you are disobedient govt. servant.
- Explain your position with in three days positively.

PRINCIPAL,
GOVT. DEGREE COLLEGE,
KHAN KOHI (NIZAMPUR),
NOWSHERA.

Copy to:

1. P.S. to Secretary, Higher Education KPK Peshawar.
2. P.A. Director, Higher Education, KPK Peshawar.
3. Coordinator/Principal GDCG Nowshera.

Attested

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29/8/16

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOHI,

NIZAMPUR, NOWSHERA.

No-: 2640

Dated: 16-11-2016

To:

Mr. Ikram Ullah
Lecturer in Pashto
Govt. Degree College Khan Kohi, Nizampur, Nowshera.

Subject:

Explanation.

1. That you absent from duty on 11-11-2016 without prior information/ sanctioning casual leave.
2. That you reached college at 10.30 AM on 12-11-2016 and left the college at 12.30 PM.
3. That you are absent from duty on 14-11-2016 without prior information/ sanctioning casual leave.
4. That you reached the college at 10.00AM on 15-11-2016 and left the college at 10.30 AM.
5. That you reached the college at 10.15 AM on 16-11-2016 where you left the college at 12.35 PM.
6. That you are not taking class of first year according time table.
7. That you are not taking interest in college co-curriculum activities.
8. That you are not attending the meeting of the college calling by principal.
9. That you have not signed the student's attendance register up till now.
10. That you are disobedient govt. servant.

Explain your position within three days positively.

**PRINCIPAL
GOVT. DEGREE COLLEGE,
KHAN KOHI (NIZAMPUR),
NOWSHERA.**

Copy to:

1. P.S. to Secretary, Higher Education KPK Peshawar.
2. P.A. Director, Higher Education KPK Peshawar.
3. Coordinator/Principal GDC Nowshera.

Attested

*hs
Ullah*

03-25430933

Handwritten notes and signatures in Urdu script, including a date 16/11/2016.

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOHI

NIZAMPUR, NOWSHERA

Dated: 24-11-2016

2651

Mr. Ikram Ullah
Lecturer in Pashto
Govt. Degree College Khan Kohi Nizampur, Nowshera.

Subject: Explanation.

1. That you absent from duty on 19-11-2016 without prior information/ sanctioning causal leave.
2. That you absent from duty on 21-11-2016 without prior information/ sanctioning causal leave.
3. That you reached college at 9:50 AM on 22-11-2016.
4. That you reached the college on 10:45 PM on 24-11-2016. (photo taken by personal camera attached with detailed on back side of photo)
5. That you are disobedient govt. servant.

Explain your position within three days positively.

PRINCIPAL
GOVT. DEGREE COLLEGE,
KHAN KOHI (NIZAMPUR),
NOWSHERA.

- Copy to:
1. P.S. to Secretary, Higher Education KPK Peshawar.
 2. P.A. Director, Higher Education KPK Peshawar.
 3. Coordinator/Principal GRGC Nowshera.

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24/11/2016

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Office of the Principal Govt. Degree College Khan Kohi Nizampur Nowshera.

No: 1704

dated: - 23/01/2017

To

The Director Higher Education,
KPK, Peshawar

SUB. C1: Refusal to Comply with Daily Attendance/Biometric

It is informed that Mr. Ikram Ullah, lecturer in Pashto of this college has not been complying with the instructions vide notification of the Secretary Higher Education Khan Kohi Pukhtunkhwa No. HED/HEMIS/2016 regarding providing biometric on the arrival and leaving times of the college premises which is mandatory. It is, therefore, requested that the further disciplinary action may be taken under the law against the said officer.

Principal

Govt. Degree College Khan Kohi
Nizampur, Nowshera.

Copy to:

1. P.S. to Secretary, Higher Education, KPK, Peshawar.
2. Copy to the officer concerned

Attested

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۲۳/۰۱/۲۰۱۷

Handwritten mark: a vertical line followed by a circled '54' and some scribbles.

Handwritten word: "Attached"

Handwritten header text at the top of the stamp: "بسم الله الرحمن الرحيم"

Large stylized calligraphic text in the center: "بسم الله الرحمن الرحيم"

Multiple lines of smaller handwritten text below the calligraphy, likely a letter or message.

Handwritten footer text at the bottom of the stamp: "بسم الله الرحمن الرحيم"

Handwritten date: "11-11-2011"

Stamp from the Ministry of Education, featuring a crescent moon and star emblem.

Text on the stamp: "DARUL ULOOM DEBRI" and "Ministry of Education".

Contact information: "Phone: 091-846378" and "Fax: 091-846384".

Handwritten text at the bottom of the stamp: "بسم الله الرحمن الرحيم"

Handwritten numbers: "32", "37", and "39" with a checkmark.

Handwritten circles and lines at the bottom of the page.

Annex 0

197
5/12/16
To



DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR

Phone # 091-9210242, 9211025/Fax # 9211803
/ CA-II/ Estt: Branch/ A-12/ Ikramullah/ Peshawar

No. _____ dated Peshawar the 28/11/2016

1. Mr. Abid Hussain,
Associate Professor of Statistics
Govt; Degree College, Khan Kohi (Nowshera)
2. Mr. Ikramullah,
Lecturer in Pashto
Govt; Degree College, Khan Kohi (Nowshera).

SUBJECT: PRESS CONFERENCE/ EXPLANATION.

I am directed to refer to the subject cited above and to state that you have given statements to Print Media by arranging a Press Conference and levelled allegations against the Principal of the College which is dereliction of the Khyber Pakhtunkhwa Govt. Servants (Conduct) Rules, 1987, according to which no Govt. servants shall in any document, published or any public utterance, radio broadcast or television programme, or in any other manner make any statement of fact or opinion which causes embarrassment to the Department and violation of conduct rules is tantamount to misconduct under E&D Rules, 2011.

2. I am further directed to ask you to explain your position as to why disciplinary action under rules ibid may not be initiated against you. Your reply should reach through your Principal to this office within 07 days positively.

Attested

he
um

Mr. Waqar Ahmad
Do as directed

BY DIRECTOR (ESTABLISHMENT)

Endst: No. 31802-1

Copy of the above is forwarded to:-

1. PS to Adviser to Chief Minister for Higher Education Information Prs Khyber Pakhtunkhwa.
2. PS to Secretary, Higher Education, Khyber Pakhtunkhwa.
3. Principal Govt. Degree College, Khan Kohi (Nowshera).

S. Barhi 25/11/16

BY: DIRECTOR (ESTABLISHMENT)