

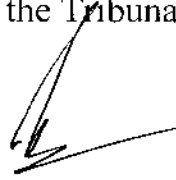
3rd Feb, 2023

Appellant in person present. Mr. Naseer-ud-Din Shah,

Assistant Advocate General for the respondents present.

Lawyers are on strike, therefore, case is adjourned. To come up for arguments on 12.05.2023 before D.B. Office is directed to notify the next date on notice board as well as on the website of the Tribunal.

SCANNED
M.P.S.T
Peshawar



(Muhammad Akbar Khan)
Member (E)



(Kalim Arshad Khan)
Chairman

28.06.2022

Learned counsel for the appellant present: Mr. Farhan Assistant alongwith Mr. Kabir Ullah, Additional Advocate General for respondents present.

Comments on behalf of respondents submitted, copy of which is handed over to the learned counsel for appellant who sought time for arguments. Adjourned. To come up for arguments on 05.10.2022 before the D.B.



(Rozina Rehman)

Member (J)

5th October, 2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.



(Salah Ud Din)

Member (J)

Appellant seeks adjournment on the ground that his learned counsel is not available today. Last chance is given to argue the case on the next date failing which the case will be decided without the arguments. To come up for arguments on 06.12.2022 before the D.B.



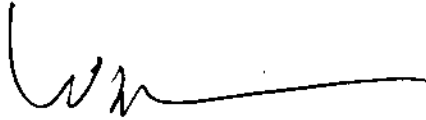
(Fareeha Paul)
Member(Executive)



(Kalim Arshad Khan)
Chairman

01.09.2021

Ms. Roeeda Khan, Advocate, for the appellant present. Mr. Jehanzeb, Superintendent alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and submitted comments, copy of which is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, and arguments before the D.B on 07.12.2021.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

07.12.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the sought adjournment on the ground that she has not prepared the brief of the instant appeal. Adjourned. Case to come up for arguments on 08.03.2022 before the D.B.



(Salah-ud-Din)
Member (J)



Chairman

8-3-22

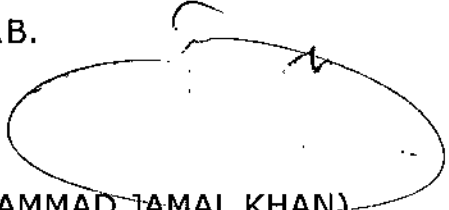
*Due to reticement of the Hon.ble
Chairman the case is adjourned to
28-6-22*

*Yours
Roodea*

04.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional AG for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional AG request for further time to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 09.12.2020 on which date to come up for written reply/comments before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

09.12.2020

Appellant in person and Addl. AG for the respondents present.

Learned AAG is required to contact the respondents and facilitate submission of requisite reply/comments on 02.02.2021 as last chance.


Chairman

02.02.2021

Junior to counsel for the appellant and Addl. AG alongwith Jehanzeb Superintendent for the respondents present.

Despite last opportunity, the respondents have not furnished the requisite reply/comments. The matter is, therefore, posted to D.B for arguments on 03.05.2021.

3.5.21

Due to COVID-19 the case is adjourned to 1-9-2021 for the hearing.


Chairman


Chairman

10.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 14.07.2020 for the same. To come up for the same as before S.B.

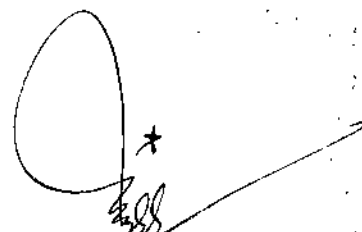

Reader

14.07.2020

None for the appellant present. Addl: AG for respondents present.

On the previous date the case was adjourned through reader note, therefore, the office shall issue notices to the respondents for written reply/comments as well as to the appellant and his counsel for attendance.

Adjourned to 15.09.2020 before S.B.


(Mian Muhammad)
Member(E)

15.09.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks adjournment in order to contact the respondents and furnish reply/comments. Adjourned to 04.11.2020 on which date the requisite reply/comments shall positively be furnished.


Chairman

04.03.2020

Counsel for the appellant, Iqbal Muhammad present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Higher Education Department as Lecturer (BPS-17). It was further contended that the appellant was issued adverse remarks pertaining to the year 2017 vide letter No. 21592/17 dated 10.08.2017. The appellant filed departmental appeal on 28.08.2018 but the same was rejected on 18.01.2019 communicated to the appellant on 30.08.2019, therefore, the appellant filed the present service appeal. It was further contended that requirement of counseling etc was not fulfilled before passing the adverse remarks by the respondent-department, therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 20.04.2020 before S.B.

Appellant Deposited
Security Process Fee




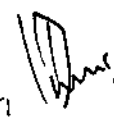
5/3/20


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

FORM OF ORDER SHEET

Court of _____

Case No.- 1192/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/09/2019	<p>The appeal of Mr. Ikram Ullah resubmitted today by Roaeda Khan 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</p>
2-	01/10/19. 01.11.2019	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>01/11/19.</u></p> <p>Counsel for the appellant present.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Learned counsel requests for adjournment in order to further prepare the brief and also lay hands on a judgment of this Tribunal regarding counseling before entering adverse remarks was dilated upon.</p> <p>Adjourned to 11.12.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p>
	11.12.2019	<p>Junior to counsel for the appellant and Addl. AG present.</p> <p>Requests for adjournment due to general strike of the Bar today. Adjourned to 20.01.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Ikramullah Lecturer Government Degree College Khan Kohi Nizampur District Nowshera received today i.e. on 19.09.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Appeal may be page marked according to the index.
- 3- Copy of impugned order dated 10.8.2017 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

No. 1625 /S.T,

Dt. 20-9- /2019.

Roeeda Khan

Roeeda Khan Adv. Pesh.

Roeeda Khan
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

objection NAE 2 has been
supplemeted whid objection
No 3 copy is not credible
has been sent to appellant.

Roeeda Khan

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR.

In Re S.A No. 1192/2019

Ikram Ullah

VERSUS

Government of Khyber Pakhtunkhwa, and Others

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5.	Copy of departmental appeal and rejection order ⁴	"A&B"	
6.	Wakalat Nama		

APPELLANT

Through

Roeda Khan
Advocate, High Court
Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Ikramullah, Lecturer BPS-17, Government Degree
College, Khan Kohi, Nizampur, District Nowshera.

....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa, through
Chief Secretary, Civil Secretariat Peshawar.
2. The Secretary, Higher Education Khyber
Pakhtunkhwa, Peshawar.
3. The Director, Higher Education Department,
Peshawar.
4. The Principal, Government Degree College, Khan
Kohi, Nizampur, District Nowshera.

....Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE ADVERSE REMARKS FOR
THE PERIOD W.E.F 15/01/2017 TO 31/12/2017
COMMUNICATED ON 25/08/2018 VIDE LETTER
NO.21592, DATED 10/08/2017 AND ORDER
DATED 18/01/2019 COMMUNICATED ON
30/08/2019 WHEREBY DEPARTMENT APPEAL
OF THE APPELLANT WAS REJECTED ON NO
GOOD GROUNDS.

Prayer:-

ON ACCEPTANCE OF THIS SERVICE APPEAL BOTH THE IMPUGNED ORDER DATED 10/08/2017 & 18/01/2019 OF RESPONDENTS MAY KINDLY BE SET ASIDE AND THE ADVERSE REMARKS MAY KINDLY BE EXPUNGED IN THE BEST INTEREST OF JUSTICE.

Respectfully Sheweth,

1. That the Appellant was initially appointed as a Lecturer on Contract basis on 28/11/2015 and was posted at GDC, Alpuri, Shangla. Later on the services of the appellant has been regularized on 2009. Ever since his appointment, the Appellant has performed his duty as assigned with zeal and devotion and there has been no complaint whatsoever has been made against the appellant.
2. That the appellant was lastly posted at GDC Khan Kohi, Nizampur vide order dated 24/07/2015 and took charge of his post vide charge report dated 01/11/2015.
3. That the attitude of the Respondent No.4 in general towards his staff members has been very inhuman, cruel and he is in habit of

using un parliamentary language with his subordinates. Due to his attitude, many of the staff members are constrained to transfer their services to other colleges / places.

4. That through out the service career of the appellant, the appellant was never given any adverse ACR which shows the outstanding and unblemished service of the appellant.
5. That the appellant was surprised to received the ACR for the period from 15/01/2017 to 31/12/2017 vide letter No.21592/17 dated 10/08/2017 at the end of August 2018 which is based on malafide and illegal, while the copy of the order dated 10/08/2017 has never been handed over to the appellant by the respondent department.
6. That feeling aggrieved from the impugned adverse ACRs, the appellant filed departmental appeal on 28/08/2018, however the same appeal was turned down on 18/01/2019 communicated to the appellant on 30/08/2019. (Copy of

departmental appeal and rejection order⁴
are attached at Annexure "A&B")

GROUND:-

- A. That the impugned ACRs as well as orders are illegal and void-ab-initio and against law, rules, principal of natural justice, hence not sustainable under the law.
- B. That the Respondent are under legal obligation to call the appellant for counseling however the opportunity of counseling has not been provided to the appellant hence the impugned remarks are liable to be expunged being contrary to law and rules.
- C. That through out the service of the appellant, no complaint or explanation, has been called from the appellant which negate the stance of the Respondent.
- D. That no opportunity of defense and personal hearing has been provided to the appellant has been provided to the appellant, hence the appellant has been condemned unheard.

E. That even no show cause notice has been issued or received by the appellant from the Respondent department.

Prayer:-

ON ACCEPTANCE OF THIS SERVICE APPEAL BOTH THE IMPUGNED ORDER DATED 10/08/2017 & 18/01/2019 OF RESPONDENTS MAY KINDLY BE SET ASIDE AND THE ADVERSE REMARKS MAY KINDLY BE EXPUNGED IN THE BEST INTEREST OF JUSTICE.

ANY OTHER RELIEF NOT SPECIFICALLY ASKED FOR MAY ALSO GRACIOUSLY BE EXTENDED IN FAVOUR OF THE APPELLANT IN THE CIRCUMSTANCES OF THE CASE.

APPELLANT

Through

Roeeda Khan
Advocate, High Court
Peshawar.

NOTE:-

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

Advocate.

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Ikram Ullah

VERSUS

Government of Khyber Pakhtunkhwa, and Others

AFFIDAVIT

I, Ikram Ullah, Lecturer BPS-17, Government Degree College, Khan Kohi, Nizampur, District Nowshera, do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

DEPONENT

Identified by:

Roeeda Khan
Advocate High Court
Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Ikram Ullah

VERSUS

Government of Khyber Pakhtunkhwa, and Others

ADDRESSES OF PARTIES

PETITIONER.

Ikram Ullah, Lecturer BPS-17, Government Degree
College, Khan Kohi, Nizampur, District Nowshera.

ADDRESSES OF RESPONDENTS

1. Government of Khyber Pakhtunkhwa, through
Chief Secretary, Civil Secretariat Peshawar.
2. The Secretary, Higher Education Khyber
Pakhtunkhwa, Peshawar.
3. The Director, Higher Education Department,
Peshawar.
4. The Principal, Government Degree College, Khan
Kohi, Nizampur, District Nowshera.

APPELLANT

Through

Roeeda Khan
Advocate, High Court
Peshawar

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Ikram Ullah

VERSUS

Government of Khyber Pakhtunkhwa, and Others

APPLICATION FOR CONDONATION OF DELAY (if any)

Respectfully Sheweth,

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the ground of the appeal be consider as integral part of this application
3. That the appellant come to know regarding the ACR of 2017 at the end of August 2018 submitted departmental appeal within one month of knowledge of the impugned order and the rejection order of the appellate

authority has been communicated to the
appellant on 30/08/2019.

4. That there are many judgment of the superior
court that the cases should be decided on
merit rather than on technically.

It is, therefore, requested that the
limitation period (if any) may kindly be
condone in the interest of justice.

APPELLANT

Through

Roeeda Khan
Advocate, High Court
Peshawar.

Annex A

To

The Director,
Higher Education Khyber Pakhtunkhwa,
Peshawar.

Subject: Adverse Remarks in the PER of 2016²⁰¹⁷ by the reporting officer.

Respected/Sir,

Reference to your letter No 21592 dated 10/08/2017 It is hereby submitted that the undersigned has always performed his duties to the best of his abilities and even served under the principal ship of Professor Sher Bahader Khan and got PERs of the year 2013 at GDC Khanpur, Haripur and 2015 at GDC Khan Kohi, Nizampur (Nowshera) with satisfactory and good remarks.

Meanwhile Prof. Sher Bahader Khan developed misunderstanding with the undersigned and started teasing with one way or the other. He completely showed bias and prejudice towards his subordinates including me. His bias, prejudice and malofid intention are evident from his following deeds/actions.

- 1- He forwarded an application to the SHO police station Nizampur vide No. 2586 dated 27/09/2016 for lodging an FIR against me, which was rejected by the concerned SHO. (Copy attached) Annexer-01
- 2- The principal concerned/Reporting officer also submitted an application dated 18/01/2017 under 22-A Cr.P.C to the august court of Session Judge/Justice of Peace (Nowshera) for compelling the SHO police station Nizampur to lodge an FIR against the undersigned without taking any advice, directive and NOC from the competent authorities/high ups. (Copy attached) Annexer-02

The Honorable Judge passed the following remarks on his this action as under: "It is the failure of your administration to bring the internal or administrative matters to the court"

The above two illegal and unlawful acts of Prof. Sher Bahader Khan are sufficient to prove his malofid 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.

Now I come to reply his adverse remarks one by one as follow:

Part-iii-(Evaluation by the Reporting Officer)

It is submitted that he has shown his narrow mindedness and graded all the columns bellow average, which is not possible for any human beings. He seems to have picked all the dirty points like a fly. It is important for a leader to look good things in his followers.

His inabilities and weaknesses are also reported by his High Ups in the reply submitted to the Service Tribunal Peshawar. (Copy attached) Annexer-03

Part-iv-(Reporting Officer's Evaluation)

The reporting officer has tried to mislead the high ups regarding my performance. I was transferred from GDC Khan Kohi, Nowshera on 07/02/2017 and my services are placed at the disposal of FATA directorate but I submitted an appeal before the court of Senior Civil Judge Nowshera on 10/02/2017 against my transfer. The august court has granted the temporary injunction against my transfer and I continued my duties at the same station. (Copy of the temporary injunction attached) .The court referred my case to Khyber Pakhtunkhwa service Tribunal Peshawar and the case was admitted for regular hearing under appeal No-512/2017 dated 25/05/2017. It is clearly mentioned in the stay order that status quo be maintained till date. Then how he (Sher Bahader) says that I did not perform my duty at this college? I have never refused of using biometric attendance. I have registered myself for biometric attendance and still using biometric machine. Due to KPPLA strike we were boycotted from biometric attendance for some days. There was a student named Kashif saleem always teasing me in one way or the other on instigation of Sher Bahader. The Principal always used the students to insult the professors. Therefore, I was tried through SMS to stop the student from such activities. I have never created conspiracies among students, teachers and class IV. If the principal has any proof in this regard please produce to you. The reporting officer has also made a baseless statement regarding my achievements in the shape of results shown by the students of my classes. How can he disagree with the statistics of the result shown in the Para-II-(2)?

Result of session 2017-18

S.No	Class	No; of students appeared in Exam	Passed	Percentage
1-	1st year	06	06	100%
2-	3 rd year	04	04	100%
3-	4 th year	03	03	100%

Integrity

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

Pen Picture

Here too he has picked the dirty points in his mind and shown bias attitude towards me.

Special aptitude

Again his attitude is found prejudice and my other PERs 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.

Obediently yours

Dated: 28/08/2018

Ikram Ullah
Lecture in Pashto
GDC Khan Kohi,
Nizampur (Nowshera)



Amir B"
DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA, RANO GARHI PESHAWAR

E-mail:- dhekpkpesh@gmail.com

Office No. 1802 /AD(ACR)

Dated: 18/1/2019

To

Mr. Ikramullah,
Lecturer in Pashto,
GDC, Kalaya, Distt: Orakzai.

Subject: ADVERSE PER FOR THE YEAR 2017 IN R/O MR. IKRAMULLAH LECTURER IN PASHTO.

Respected Sir / Madam, السلام عليكم

It is to inform that the Higher Education Department regrets its inability to expunge the adverse remarks in the PER of Mr. Ikramullah Lecturer in Pashto for the calendar year 2017 Govt: Degree college, Khan Kohi Nizampur, Nowshera being time bared.

Assistant Directress (ACR)

Endst.No 1803 /11

Copy forwarded to:

1. Principal GDC, Landi Kotal for information.
2. Principal GDC, Kalaya (Orakzai) for information.

Assistant Directress (ACR)

Received on 30/8/2019
from the office of DHE. KP.

30/8/2019

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

**S.A 1192/2019
Mr. Ikram Ullah**

Appellant

Versus

Govt. of Khyber Pakhtunkhwa
Through Secretary, Higher Education Department,
Peshawar & Others

Respondents

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Respondents

BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL
PESHAWAR

S.A # 1192/2019

Ikramullah.....Appellant

Versus

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

Respondents

SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1,2,3 & 4

Respectfully Sheweth: -

The respondents submit as under.

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**).

- 22
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. Subject to Proof.
 6. Correct to the extent that the departmental appeal was regretted (**Annex-D**) and communicated to the appellant vide letter dated: 18-01-2019 (**Annex-E**). It is pertinent to mention here that the instant Service Appeal is badly time barred. Section 4 of the Khyber Pakhtunkhwa Service Tribunal act is read as under.
“ Any Civil servant aggrieved by any final order, whether original or appellate made by a departmental authority in respect of any of the terms and conditions of his service may, within thirty days of the communication of such order to him [or within six months of the establishment of the appropriate Tribunal, whichever is later], prefer an appeal to the Tribunal having jurisdiction in the matter:” (**Annex-F**)

Reply on Grounds: -

- A. Incorrect. As already explained.
- B. 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.
- C. Incorrect. That the appellant was habitual of absenteeism, motivating students against Principal, late coming, not attending the college meetings, not marking biometric attendance (**Annex-G**) 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-H**), letter dated: 07-11-2016 (**Annex-I**), letter dated 16-11-2016 (**Annex-J**), letter dated: 24-11-2016 (**Annex-K**) letter dated: 23-01-2017 (**Annex-L**), but the appellant did not pay any heed and continue his activities and behaviour. The appellant did press conference against the Principal (**Annex-M**) in utter violation of Conduct Rules, 1987, an explanation was also called from him in this regard (**Annex-N**).

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)**

- D. Incorrect. As already explained in preceding paras.
- E. Incorrect. As already explained in preceding Para.

Prayer:-

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


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. 4



**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

S.A 1192/2019

Mr. Ikram Ullah Appellant


Versus

Govt. of Khyber Pakhtunkhwa
Through Secretary, Higher Education Department,
Peshawar & Others Respondents

AFFIDAVIT

I, Jehanzeb Khan Superintendent (Litigation) Higher Education Department do hereby declare and affirm on oath that the contents of Para Wise Comments are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Identified by:


Deponent
Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

Annex - A

5

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

No. _____

Dated Khanpur the 4-8-2015

To

Mr. Ikramullah Khan,
Lecturer in Pashto
GDC Khanpur.

Subject: Relieving in absentia.

Memo:

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

You are therefore, directed to return (Almara, Charpies, Chairs, Tables, Fans), that you have taken home for your personal use, immediately.

Principal,
Govt. Degree College
Khanpur (Haripur)

Ends: No. 1554-56
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 Khan Khoi, Nizampur.

Principal,
Govt. Degree College
Khanpur (Haripur)

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR**

Phone # 091-9210242, 9211025/Fax # 9210215
No. 26222 / CA-II / Estt: Branch/A-12/Ikramullah/Pashto

Dated Peshawar the 26 / 10 / 2015

To

Ikram Ullah
Lecturer in Pashto
Govt: Degree College, Khanpur (Haripur).

SUBJECT EXPLANATION/RELIEVING IN ABSENTIA.
Memo:

I am directed to refer to the Principal Govt: Degree College, Khanpur (Haripur) letter No. 1554-56 dated 04-08-2015 address to you and copy thereof endorsed to this office on the subject cited and to ask you as to why you have used the Government property for which were not authorized.

I am, therefore, directed to ask you to explain you have used the Government property unauthorizably. Your explanation should reach this office within three days of the receipt of this letter.

Endst; No. 26223-24

DY: DIRECTOR (ESTABLISHMENT)

Copy of the above is forwarded to the:-

1. Principal Govt: Degree College, Khanpur (Haripur).
2. PA to Director Higher Education Khyber Pakhtunkhwa.

DY: DIRECTOR (ESTABLISHMENT)

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

**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, KP Peshawar 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.

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- p-152

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 DIII office through SO(Colleges-I), Govt: of KP. Higher Education Deptt: Peshawar.

The second letter relates to letter No. SO (College-I)/III/1-2/ 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.

10/9/17
16/17

Second letter of the date 17/02/2017 with the subject 'Inquiry into the irregularities in the college account books of GDC Khan Khoi'.

Inquiry Proceedings:


The inquiry committee contacted the 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 Khoi.

I. Inquiry No. 2751/CA-II/Estt: Branch/A-12/Sher Bahadar/Statistics

Probing into the facts behind 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:

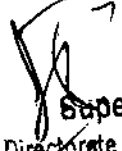
1. The Principal was inquired about his post; he showed a notification by the Govt. for his personal up gradation of the post i.e., the post will be automatically downgraded with the relieving of Prof: Sher Bahadar. The DAO Nowshera makes payments according to the Govt: orders. Annexure B (03 pages).
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 the 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 IIIACE 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 (annex. A).
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 leveling cultivated it for wheat from which the total output was about 2-3 mounds. 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 AC bill was submitted to DAO 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 in 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 the supply is still pending. It is worth mentioning that the supplier deceived all the JMC colleges of Nowshera and the supplier has been black listed by the Coordinator/Principal GPGC 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


Superintendent
Directorate of Higher Education
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(10/12)
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orders. In this respect, the Chief Proctor/Office assistant was also contacted but both of them denied of 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 (photo copies 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 IIIACE 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 out 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, etc; while a few of the enlisted students denied of 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. The statements of students are annexed as E(07 pages).

The students of Pashto explained that once Prof: Ikram Ullah gave them a blank paper just to sign it but they did not know what was going to be written over it. According to them, they got information about that statement during these inquires. They further stated that Mr. Ikramullah 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 Hussain 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 ul

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

P-235. 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-221 . 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-238 . 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 Akora 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: Shehzad
- (iii) Mr. Ayub Zaman(Mali)
- (iv) Mr. Hafeez 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/Estt: 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. Hafeez ur Rehman Lab Attendent are attached. These statements are more or less same with similar contents. Same type allegations were leveled over the principal.


Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

Some type allegation were levied 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 Shahzad 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.


Superintendent
Directorate of Higher Education
Faisalabad


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.


Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar


Prof: Muhammad Nawaz,
Principal GDC Khanpur, Haripur.


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

PER GRADING AND QUANTIFICATION FORM IN RESPECT OF
 MR. IKRAMULLAH LECTURER IN PASHTO
 REGULAR PROMOTION FROM B-17 TO B-18

Seniority No.

Year	Period of PER		Reporting Officer	Pen Pictura	Countersigning Officer	PER Assessment	Fitness for Promotion	Score
	From	To						

Present 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	2
2010	1.1.2010	31.12.2010	He is regularly regularized and is new in the field, will improve slowly.		Agreed with R.O.	Good	Fit	3
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	3
2012	1.1.2012	31.12.2012	Dependable, social, polite, can face problems.		Agreed with R.O.	Good	Fit	3
2013	1.1.2013	31.12.2013	He is fair, 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	3
2014	1.1.2014	31.12.2014	This officer is a sincere man, positive attitude, well behaved and hardworking.		Agreed with R.O.	V.Good	Fit	3
2015	1.1.2015	31.12.2015	Reliable, confident, dependable. Have the ability to face any type of problem.		Agreed with R.O.	Good	Fit	3
2016	1.1.2016	31.12.2016	Not trustable, 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 CONDUCTED NOT RECOMMENDED	Agreed with R.O.	Average	Unfit to progress further	0
2017	1.1.2017	31.12.2017	Dull person. He repeated the same practices as like in GDC, Shejari, GDC, Khan Kohl.	ADVERSE CONDUCTED NOT RECOMMENDED	Agreed with R.O.	Average	Unfit to progress further	0
2018	1.1.2018	17.4.2018	Not dependable. He always create problems of administration in one way or others.	ADVERSE CONDUCTED NOT RECOMMENDED	Agreed with R.O.	Average	Unfit to progress further	0
2019	1.1.2019	31.12.2019	Hardworking teacher and devoted to his job. The officer possesses qualities of a good teacher. He can work in any situation he is for for promotion.	Agreed with R.O.	Agreed with R.O.	Good	Fit	3

COMPREHENSIVE EFFICIENCY INDEX

PERs quantified score @ 100%	Basic Scale	Aggregate Score	Weightage Factor	Point Obtained
	Present Scale	5.02	10X6.02	60.2
	(i) Additions			
	(ii) Deductions	60.2-3=57.2		57.2
	Total	0	0	57.2

Required threshold on CEI to BS-18 is 50

Supintendent
 Directorate of Higher Education
 Khyber Pakhtunkhwa Peshawar

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Annex-D

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(2)



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

No. SO (C-II)HED/12-16/2018/ACR/PER/Ikramullah/Pashto
Dated Peshawar the, 09.01.2019.

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730
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To

The Director,
Higher Education Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: - ADVERSE PER FOR THE YEAR 2017 IN R/O OF IKRAMULLAH
LECTURER IN PASHTO

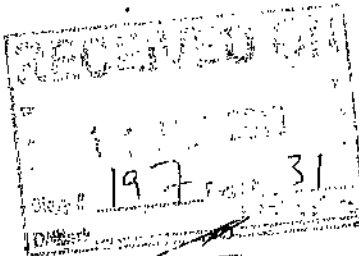
I am directed to refer to your letter No. 23058/ AD (ACR) dated 06.12.2018 on the subject noted and to state that this Department regrets its inability to expunge the adverse remarks in the PER of Mr. Ikramullah, lecturer in Pashto for the calendar year 2017 Govt; Degree College, Khan Kohi Nizampur, Nowshera being time bared.

It is, therefore, requested to inform the officer concerned accordingly.

Encl: ACRs in original through special messenger

(MUHAMMAD FAYAZ KHAN)
SECTION OFFICER (COLLEGES-II)

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar



AD (ACR)

11/1/19



Annex E
DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA, KHYBER ROAD PESHAWAR

Tel # 091-9210668, 9213009 Fax # 091-9210215

E-mail:- dhekpakesh@gmail.com

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Office No. _____ /AD(ACR)

Dated: 10/1/2019

To

Mr. Ikramullah,
Lecturer in Pashto,
GDC, Kalaya, Distt: Orakzai.

Subject: ADVERSE PER FOR THE YEAR 2017 IN R/O MR. IKRAMULLAH LECTURER IN PASHTO.

Respected Sir /Madam, السلام عليكم

It is to inform that the Higher Education Department regrets its inability to expunge the adverse remarks in the PER of Mr. Ikramullah Lecturer in Pashto for the calendar year 2017 Govt: Degree college, Khan Kohi Nizampur, Nowshera being time bared.

Endst.No. 1803-11

Supervisor
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

Assistant Directress (ACR)

Copy forwarded to:

1. Principal GDC, Landi Kotal for information.
2. Principal GDC, Kalaya (Orakzai) for information.

Assistant Directress (ACR)

Address: Old Judicial Complex, Khyber Road Peshawar

¹[(4) The Chairman and members of a Tribunal shall be appointed by the Governor in consultation with the Chief Justice of the Peshawar High Court.]

(5) The Chairman or a member of a Tribunal may resign his office by writing under his hand addressed to the Governor.

(6) The Chairman or a member of a Tribunal may be appointed by name or by designation.

²[3-A Adhoc appointment.—The Governor may, if necessary or expedient, for a particular case or cases, make an ad hoc appointment on the Tribunal of person qualified to be Chairman or a member as the case may be.]

³[3-B Tenure, Terms and conditions of service of Chairman and members. (1) The Chairman and a member shall hold office for a period of three years or until he attains the age of sixty years, whichever is earlier, and shall not be eligible for re-appointment:

Tenure, Terms and conditions of service of Chairman and members.

Provided that if a judge of the High Court is appointed as Chairman, he shall hold office for a period of three years or until he attains the age of superannuation as judge of the High Court whichever is earlier.

(2) In case, a retired judge of the High Court is appointed as Chairman under clause (a) of sub-section (3) of section 3, he shall hold office for a period of three years and shall not be eligible for re-appointment.

(3) The other terms and conditions of service of the Chairman and members shall be such as may be determined by the Governor.]

4. Any civil servant aggrieved by any final order, whether original or appellate made by a departmental authority in respect of any of the terms and conditions of his service may, within thirty days of the communication of such order to him ⁴[or within six months of the establishment of the appropriate Tribunal, whichever is later], prefer an appeal to the Tribunal having jurisdiction in the matter:

Appeals to Tribunals.

Provided that ----

¹Substituted vide Khyber Pakhtunkhwa Act No. XXII of 2013, S 2(b).

²Inserted vide Khyber Pakhtunkhwa Act No. XIII of 1976, S.2.

³Inserted vide Khyber Pakhtunkhwa Act No. XXII of 2013, S.3.

⁴Inserted vide Khyber Pakhtunkhwa Act No. IX of 1974, S.3 (a).

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

G

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

No: 2704

dated: - 23/01/2017


to

The Director Higher Education,
KPK, Peshawar

SUBJECT: 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 Khyber Pakhtunkhwa 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.


Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar


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

اگر اساتذہ نے روزانہ
انٹرن کیا

م/ر
م/ر
م/ر
03025430933 (منواری کے نام)

23/01/2017

Annex - G

20
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Higher Education, Archives and Libraries Department
Government of Khyber Pakhtunkhwa

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

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Summary :

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

Superintendent
Directorate Higher Education
Khyber Pakhtunkhwa Peshawar

H

(21/10/16)

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOHI,

NIZAMPUR, NOWSHERA.

No: 2612

Dated: 27-10-2016

To:


Mr. Ikram Ullah
Lecturer in Pashto
Govt. Degree College Khan Kohi 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. Razaqat 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 that an 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 me in 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 creating 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 he can creates 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 KOHI (NIZAMPUR),
NOWSHERA.**

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

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15

**Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar**

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOHL,

NIZAMPUR, NOWSHERA.

No-: 2630

Dated: 07-11-2016

To:

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

Subject:

Explanation.

1. That you absent from duty on 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 studenta attendance register uptill now.
9. That you are disobedient govt. servant.

Explain your position with in three days positively.

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

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 GPGC Nowshera.

ایکرام اللہ کو خط لکھ کر دیا گیا ہے

اس کا جواب دینا

مہ 11/07

03025430933

مہ 11/07

27/11/16

233

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.

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

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. Coprdinator/Principal GFGC Nowshera.

Handwritten signature and date: 16/11/2016

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Handwritten signature and date: 16/11/2016

14 24
24
OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOHI,

NIZAMPUR, NOWSHERA

No: 2651

Dated: 24-11-2016


To:

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


Subject: Explanation

1. That you absent from duty on 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 10.45PM 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 GPGC Nowshera.


Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

ایکرام اللہ صاحب کو درود و تحیات پیش کرتا ہوں
میں نے آپ کو 24/11/2016 کو کال کیا تھا
میں نے آپ کو 24/11/2016 کو کال کیا تھا

03025430933

24/11/2016

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

Dated:-23-01-2016

No: - 2694

To

Mr. Ikram Ullah

Lecturer in Pashto

Govt. Degree college Khan.Kohi-Khan, Nizampur Nowshera.

Subject: - Explanation

1. I have inform you about the submission of PER of 2016 vide this office letter No. 2674 dated 22-12-2016 however you refused to sign the said circular and also you have not submitted PER with in a time.
2. You are in habit of self assumed leave without prior permission of the competent authority. You are absent from duty on dated 07-01-2017 to 09-01-2017.
3. You do not follow the instructions of higher education issued for the college teaching staff during the official timing even though you do not wearing the Gown..
4. You do not come on proper time that 8.00 AM and went before off time.
5. Govt. is provided the facility of Biometric System to check the punctuality and attendance but you do not use neither on coming nor leaving the college, vide notification of Secretary Higher Education Khyber Pakhtunkhwa No. HED/HEMIS/Biometric/2016 dated 27-07-2016 which is compulsory for officials/-officers

Explain your position in three days positively.

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

Principal

Govt. Degree College Khan
Kohi-Nizampur Nowshera.

No: _____ dated: _____

Copy to:-

1. P.S. to Secretary, Higher Education KPKP Peshawar.
2. P.S. to Secretary, Law KPKP Peshawar.
3. P.A. Director, Higher Education KPKP Peshawar.
4. Principal, GPGC Nowshera.

03025430933

23/1/2016

پاکستان کے سب سے بڑے اخبار

ABC CERTIFIED

اولیٰ تصدیق شدہ اشاعت

THE JANG NAVIAPINDI

جنگ

پاکستان کے سب سے بڑے اخبار

پرائیمری ایڈیٹر: میر غنی احمد خان

پرائیمری ایڈیٹر: میر غنی احمد خان

KP EDITION MONDAY NOVEMBER 14, 2016

58 روپے 13 ستمبر 1438ھ 14 نومبر 2016ء 31 ستمبر 2073ء 314

خبر پختونخوا کانچ پیرز ایسوسی ایشن نے احتجاج کی دھمکی دیدی

پشاور (نامہ نگار) پختونخوا کانچ پیرز ایسوسی ایشن (پکپا) نے ٹوکل پیمنٹ کے عدم بروٹھریا اور ان کے خلاف اٹلیا تقاضات کرنے کا مطالبہ کرتے ہوئے 5 نومبر 42

پشاور (نامہ نگار) پختونخوا کانچ پیرز ایسوسی ایشن (پکپا) نے ٹوکل پیمنٹ کے عدم بروٹھریا اور ان کے خلاف اٹلیا تقاضات کرنے کا مطالبہ کرتے ہوئے 5 نومبر 42

موجودہ پی ٹی آئی حکومت نے جیاد کی تمام حدیں پار کر دیں، سینئر عطا الرحمن

پشاور (نامہ نگار) پاکستان میں ایک سینیئر وقت سے جو اسلام کی سر بلندی کیلئے 350 سال سے جدوجہد کر رہے ہیں، وہ ترقی پذیر روز بومین کوئل تقاضات کے لیے 5 نومبر 43

پشاور (نامہ نگار) پاکستان میں ایک سینیئر وقت سے جو اسلام کی سر بلندی کیلئے 350 سال سے جدوجہد کر رہے ہیں، وہ ترقی پذیر روز بومین کوئل تقاضات کے لیے 5 نومبر 43

کوہستان میں پولیو کیس سامنے آنے کے بعد تین روزہ پولیو ٹیم کا آغاز

پشاور (پبلک ریلر) پختونخوا کے تین کم پستان میں پولیو کیس سامنے آنے کے بعد حکومت نے تین روزہ پولیو ٹیم شروع کرنے کا فیصلہ کیا ہے، ہم کوہستان کے علاوہ شالہ میں بھی چلائی

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PAKISTAN LTD.

پاکستان کے سب سے بڑے اخبار

سیگا ویلرز کونسل

روزنامہ جنگ

آئی ایم ایف اور ورلڈ بینک کی مالی معاونت سے جاری ہے۔

ماہی خان اور سید شاہد علی نے جے ایم ایف اور ورلڈ بینک کی مالی معاونت سے جاری ہے۔

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تین ایک ہزار ایک طرف

5 نومبر 41

خواتین سیں پارٹی

مطالبہ کریں گے

ان دنوں ایک تحریک انصاف کے

پشاور (پبلک ریلر) پختونخوا کے تین کم پستان میں پولیو کیس سامنے آنے کے بعد حکومت نے تین روزہ پولیو ٹیم شروع کرنے کا فیصلہ کیا ہے، ہم کوہستان کے علاوہ شالہ میں بھی چلائی

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Superintendent
Director of Education
Hydrabad, Pakistan

روزنامہ اخبار خیبر

DAIRYAKHBARE-KHYBER

Ph: 091-5946378
Fax: 091-5946304

info@akhbarekhyber.com

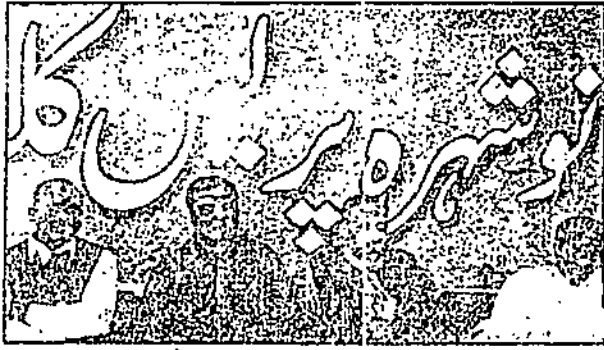
پشاور اسلام آباد اور لاہور سے ہفت روزہ شائع ہوتا ہے اکثر اشاعت اخبار

14-11-2014

گورنمنٹ کالج کراچی کا طالب علم کو ریٹائرمنٹ کا حکم دینے پر احتجاج

پرنسپل نے طلباء اور اساتذہ کو ریٹائرمنٹ میں مبتلا کرنے سمیت کرپشن کا بازار گرم کر رکھا ہے۔

پشاور (پشاور پوسٹ) - گورنمنٹ کالج کراچی کے طالب علموں نے پرنسپل کے ایک فیصلے کے خلاف احتجاج کیا ہے۔ اس فیصلے کے تحت اساتذہ کو ریٹائرمنٹ دینے اور طلباء کو ریٹائرمنٹ کا حکم دینے کا حکم دیا گیا ہے۔ اس فیصلے کے خلاف طلباء اور اساتذہ نے پرنسپل کے دفتر پر دھاوا بھارتی کر کے اساتذہ کو ریٹائرمنٹ دینے اور طلباء کو ریٹائرمنٹ کا حکم دینے کا حکم دیا گیا ہے۔ اس فیصلے کے خلاف طلباء اور اساتذہ نے پرنسپل کے دفتر پر دھاوا بھارتی کر کے اساتذہ کو ریٹائرمنٹ دینے اور طلباء کو ریٹائرمنٹ کا حکم دینے کا حکم دیا گیا ہے۔



پشاور، ریٹائرمنٹ کے خلاف احتجاج میں طلباء اور اساتذہ کی شرکت

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

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The [Khyber Pakhtunkhwa] Government Servants (Conduct) Rules, 1987.

1. **Short title and commencement.** (1) These rules may be called the ²[Khyber Pakhtunkhwa] Government Servants (Conduct) Rules, 1987.³

(2) They shall come into force at once.

2. **Extent of application:-** These rules apply to every person, whether on duty or on leave within or without the ⁴[Khyber Pakhtunkhwa] serving in connection with the affairs of the ⁵[Khyber Pakhtunkhwa], including the employees of the Provincial Government deputed to serve under the Federal Government or with a statutory Corporation or with a non-Government employer, but excluding:-

- (a) members of an All-Pakistan Service serving in connection with the affairs of the Province;
- (b) employees of the Federal Government or other authority deputed temporarily to serve under the Provincial Government; and
- (c) holders of such posts in connection with the affairs of the ⁶[Khyber Pakhtunkhwa] as the Provincial Government may, by a notification in the official Gazette, specify in this behalf.

3. **Definitions:-** (1) In these rules, unless there is anything repugnant in the subject or context:

- (a) "Government" or "Provincial Government" means the Government of the ⁷[Khyber Pakhtunkhwa];
- (b) "Government Servant" means a person to whom these rules apply;
- (c) "member of a Government Servant's family" includes:-
 - (i) his wife, children and step children, parents, sisters and minor brothers, residing with and wholly dependent upon the Government Servant; and

Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

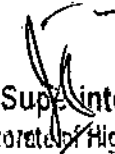
Published in the Khyber Pakhtunkhwa Government Gazette, Extraordinary, dated 10.2.88

Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011.

Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011


Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

Secretary to the Administrative Department, as the case may be, in which he is employed.

20. **Report by Government servant in case of his involvement in a criminal case:-** If a Government servant is involved as an accused in a criminal case, he shall bring the fact of such involvement or conviction, as the case may be, to the notice of the Head of the Office or Department immediately or, if he is arrested and released on bail, soon after such release.

21. **Unauthorized communication of official documents or information:-** No Government servant shall, except in accordance with any special or general order of Government, communicate directly or indirectly any official information or the contents of any official document to a Government servant not authorized to receive it, or to a non-official person, or to the press.

22. **Approach to Members of the Assemblies:-** No Government servant shall, directly or indirectly approach any member of the National Assembly or a Provincial Assembly or any other non-official person to intervene on his behalf in any matter.

23. **Management, etc. of Newspapers or Periodicals:-** No Government servant shall except with the previous sanction of Government, own wholly or in part, or conduct or participate in the editing or management of any newspaper or other periodical publication.

24. **Radio-Broadcast and communications to the Press:-** No Government servant shall, except with the previous sanction of Government, or any other authority empowered by it in this behalf, or in bona fide discharge of his duties, participate in a radio broadcast or television programme or contribute any article or write any letter, either anonymously or in his own name or in the name of any other person to any newspaper or periodical:


Provided that such sanction shall generally be granted if such broadcast or television programme or such contribution or letter is not, or may not be considered likely to jeopardize the integrity of the Government servant, the security of Pakistan or friendly relations with foreign states or to fend public order, decency or morality, or tantamount to contempt of court, defamation or incitement to an offence:

Provided further that no such sanction shall be required if such broadcast or television programme or such contribution or letter is of a purely literary, artistic or scientific character.

25. **Publication of information and public speeches capable of embarrassing Government:-** (1) No Government servant 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 is capable of embarrassing the Federal or any Provincial Government.

Provided that technical staff may publish research papers on technical subjects, if such papers do not express views on political issues or on Government Policy and do not include any information of a classified nature.

(2) Where a Government servant submits the draft of a literary, artistic or scientific article or book for obtaining previous sanction for its publication, he shall be informed within three months of his doing so whether he has or has not such sanction: and if


Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

(3630)

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR**

Phone # 091-9210042, 9211025/Fax # 9211803

No. _____ / CA-11/ Estt. Branch/A-11/ Ikramullah/ Pashto

Dated Peshawar this 28 / 11 / 2016

DATE 1977
07/12/16
To

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 B&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.

Endst: No. 31302-4

BY: DIRECTOR (ESTABLISHMENT)

Copy of the above is forwarded to:-

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

*Mr. Ikramullah - Secy
Dir of H.E. Dept.*

SHIRAZ

g. Bahi / 25/11/16

BY: DIRECTOR (ESTABLISHMENT)

Superintendent

Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

N1

31/12/16

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

dated: -05-12-2016

No:-2664

To

1. Mr. Abid Hussain
Associate Professor of Statistics
Govt. Degree college.khan Kohi Khan, Nizampur Nowshera.
2. Mr. Ikramullah,
Lecturer in Pashto
Govt. Degree college khan Kohi Khan, Nizampur Nowshera.

SUBJECT: PRESS CONFERENCE/ EXPLANATION

Reference the Directorate of Higher Education KPK Peshawar letter no. 31902-4 dated 28-11-2016. The original copy of the explanation is attached. You are directed to explain your position within 07 days positively through Principal.

[Handwritten Signature]
Principal

Govt. Degree College Khan Kohi
Nizampur Nowshera.

[Handwritten Signature]
Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar

Cop to:-

- (i) P.S. Secretary, Higher Education KPK, Peshawar for information.
- (ii) P.A. Director Higher Education KPK, Peshawar for information.
- (iii) The principal / Coordinator, Govt. Postgraduate College Nowshera.

میں فراہم شدہ دستاویزوں میں سے ایک کاپی
اور عبدالرحمن صاحب کے پاس سرکاری فون
کے لیے لیٹن دوپٹوں کے وصول کرنے سے متعلق

فون: 03025430933
پتہ: خیبر پختونخوا کالڈیا - 17201-4685654

NI

(37)
60

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

No:-2664

dated: -05-12-2016

To :

Director

Higher Education KPK, Peshawar.

SUBJECT: PRESS CONFERENCE/ EXPLANATION

Reference your letter no. 31902-4 dated 28-11-2016.

1. That Mr. Abid Hussain
Associate Professor of Statistics
Govt. Degree college khan Kohi Khan, Nizampur Nowshera, and
2. Mr. Ikramullah,
Lecturer in Pashto
Govt. Degree college khan Kohi Khan, Nizampur Nowshera.
Refused to receive your letter, please.

Superintendent
Directorate of Higher Education
Khyber Pakhtunkhwa Peshawar.

Principal

Govt. Degree College Khan Kohi
Nizampur Nowshera.

Cop to:-

1. P.S. Secretary, Higher Education KPK, Peshawar for information.
2. The principal / Coordinator, Govt. Postgraduate College Nowshera.