

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No. 1885 of 2022

Kashif Ullah Lab Attendant Currently Chowkidar at Government Degree College  
Charbagh, District Swat.

... Appellant

VERSUS

SCANNED  
KPST  
Peshawar

The Secretary Higher Education Department, Peshawar and Others.

... Respondents

INDEX

S. No.	Description of documents	Annexure	Pages
1.	Memo of Appeal	....	1-5
2.	Affidavit	....	6
3.	Addresses of the parties	....	7
4.	Copy of the Appointment Order	A	8-9
5.	Copy of the Order dated 10-09-2021	B	10
6.	Copy of the Advertisement	C	11
7.	Copies of the Attendance Register	D	12-14
8.	Copies of the Relevant pages of the Service Book	E	15-16
9.	Copy of the Salary Statement	F	17
10.	Copy of the Order dated 02-09-2022	G	18
11.	Copy of the Order dated 07-09-2022	H	19
12.	Copy of the Application	I	20
13.	Copy of the Departmental Appeal	J	21-22
14.	Copy of the Order dated 15-12-2022	K	23
15.	Vakalat Nama	....	24

Appellant Through

*Imdad Ullah*

Advocate Swat

Office: Khan Plaza, Gulshone Chowk,  
Mingora Swat, Cell 0333 929 7746

①

BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1885 of 2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 2393

Dated 20/12/2022

Kashif Ullah Lab Attendant Currently Chowkidar at  
Government Degree College Charbagh, District Swat.

...Appellant

VERSUS

1. The Secretary Higher Education Department,  
Peshawar.
2. The Director Higher Education, Peshawar.
3. The Cluster Coordinator / Principal Government  
Post Graduate Jehanzeb College Saidu Sharif,  
District Swat.
4. The Principal Government Degree College  
Khwazakhila, District Swat.

...Respondents

Filed to-day

Registrar

20/12/2022

SERVICE APPEAL UNDER SECTION 4  
OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974  
AGAINST THE ORDER NO. 360-  
363/KASHIF ULLAH/GDCKK/22 DATED  
12-09-2022, WHEREBY THE CADRE OF  
THE APPELLANT WAS CHANGED  
FROM LAB ATTENDANT TO THAT OF  
CHOWKIDAR AND ALSO  
TRANSFERRED ON POLITICAL  
INFLUENCE AGAINST THE LAW AND  
RULES, FEELING AGGRIEVED THE  
APPELLANT PREFERRED A

DEPARTMENTAL APPEAL, BUT THE SAME WAS NOT RESPONDED TO DESPITE THE LAPSE OF STATUTORY PERIOD OF TIME.

---

PRAYER:

*That on acceptance of this appeal the order impugned may very kindly be set aside and the appellant let to perform his duties as lab attendant at Government Degree College Khwazakhila.*

---

Respectfully Sheweth:

Facts:

- i. *That the Appellant was appointed as Chowkidar at Government Girls Degree College Kwaza Khila Swat in due course of law by observing all the codal formalities. Copy of the appointment order is enclosed as Annexure "A".*
- ii. *That the Appellant was then transferred to Government Degree College Khwaza Khila and performed his duties as Chowkidar at Government Degree College Khwaza Khila. Copy of the order dated 10-09-2021 is enclosed as Annexure "B".*
- iii. *That certain post of Lab Attendant were announced and the Appellant also submitted an application for the same. That the Principal made my permanent order of Lab Attendant as he was authority. Copy of the advertisement is enclosed as Annexure "C".*

- iv. That all the necessary entries were made in the record and the Appellant assumed his charge as Lab Attendant. Copies of the Attendance Register are enclosed as Annexure "D", that of the relevant pages of service book are enclosed as Annexure "E" and that of the salary statement are enclosed as Annexure "F", respectively.
- v. That vide order Endst: No. 1301-02 / J-22 dated 02-09-2022 the Appellant was again transferred to Government Girls Degree College Khwaza Khila and then to Government Degree College Charbagh on the post of Chowkidar. Copy of the order dated 02-09-2022 is enclosed as Annexure "G".
- vi. That feeling aggrieved the Appellant brought the same into the notice of the Respondent No. 3, who vide order Endst: No. 1377-80/J-22 dated 07-09-2022 cancelled the order dated 02-09-2022. Copy of the order dated 07-09-2022 is enclosed as Annexure "H".
- vii. That in order to pursue his case the Appellant submitted an application for the provision of the copies of the documents, but the same are yet to be provided. Copy of the application is enclosed as Annexure "I".
- viii. That the appellant feeling aggrieved submitted departmental appeal for the redressal of his grievances, but the same is not responded to despite

the lapse of the statutory period of time. Copy of the departmental appeal is enclosed as Annexure "J".

- ix. That strange enough and flabbergasting pending disposal the departmental appeal the Respondent No. 3 again cancelled his order dated 07-09-2022 vide order Endst: No. 1975-79 Kashifullah/2022 dated 15-12-2022 against the law and rules on the subject and is liable to be cancelled as well. Copy of the order dated 15-12-2022 is enclosed as Annexure "K".
- x. That still feeling aggrieved and having no other option this Honourable Tribunal is approached on the following grounds.

Grounds:

- a. That the Appellant is dealt with in manner not warranted by the law and rules on the subject emanating from the commands of the constitution.
- b. That the Appellant was duly appointed / adjusted against the vacant post of Lab Attendant and all the relevant entries were also made in the service record and the Appellant also took over the charge and performed his duties as such but due to political influence the cadre of the Appellant was changed in utter violation of the law and rules on the subject, which is never approved by the law.
- c. That this is a classic case of misuse and abuse of authority in a very colorful and fanciful manner

just to please the political elite for personal gains by bulldozing all the codal formalities and relevant laws and rules and showing utter disregard to the same.

- d. That the Appellant has been denied his vested and accrued rights.
- e. That the Appellant has been discriminated with.

It is, therefore, very respectfully prayed that on acceptance of this service appeal both the impugned orders may very kindly be set aside and the Appellant let to perform his duties as Lab Attendant as his original place of posting.

Any other relief deemed appropriate in the circumstances and not specifically prayed for may also very kindly be granted.

Appellant

Kashif Ullah

Through Counsels,

Aziz-ur-Rahman

Imdad Ullah

Advocates Swat

*Kashif Ullah*

*Aziz-ur-Rahman*

6

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

Service Appeal No. \_\_\_\_\_ of 2022

*Kashif Ullah Lab Attendant Currently Chowkidar at  
Government Degree College Charbagh, District Swat.*

*...Appellant*

**VERSUS**

*The Secretary Higher Education Department, Peshawar  
and Others.*

*...Respondents*

**AFFIDAVIT**

*It is solemnly stated on Oath that all the contents of  
this service appeal are true and correct to the best of my  
knowledge and belief and nothing has either been  
misstated or kept concealed before this Honourable  
Tribunal.*

**ATTESTED**



Deponent

Kashif Ullah

*Kashif Ullah*

7

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

Service Appeal No. \_\_\_\_\_ of 2022

*Kashif Ullah Lab Attendant Currently Chowkidar at  
Government Degree College Charbagh, District Swat.*

*...Appellant*

**VERSUS**

*The Secretary Higher Education Department, Peshawar  
and Others.*

*...Respondents*


**ADDRESSES OF THE PARTIES**

Appellant:

*Kashif Ullah Lab Attendant Currently Chowkidar at  
Government Degree College Charbagh, District Swat.*

Respondents:

- 1. The Secretary Higher Education Department,  
Peshawar.*
- 2. The Director Higher Education, Peshawar.*
- 3. The Cluster Coordinator / Principal Government  
Post Graduate Jehanzeb College Saidu Sharif,  
District Swat.*
- 4. The Principal Government Degree College  
Khwazakhila, District Swat.*

Appellant  
Through Counsel  
  
Imdad Ullah  
Advocate Swat



OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE  
KHWAZAKHELA SWAT

NOTIFICATION

*Av*

As per the recommendation of departmental selection committee, the following persons are hereby appointed as Class IV against the vacant posts in BPS-110/35/260-143/51 with the allowances as admissible under the rules on regular basis under the existing policy of the Federal Govt, on the terms and conditions given below.

8

No	Name	Fathers Names	Post	Remarks
01	Mr Riaz Ali	S/O D/o & W/O	Naib Qasid	Open Merit
02	Mr Zabardast Khan	S/O Saranzeb.	Chowkidar	Open Merit
03	Mr. Nasir Iqbal	S/O Jalal Khan	Mali	Open Merit
04	Mst Wahida bibi	S/O Habibur Rahman	Sweeper	Open Merit
05	Mst Miraj Bi Bi	W/O S'ierin Zada	Bearer	Open Merit
06	M. Rahmatia bibi	W/O Didar Ali	Cook	Open Merit
07	Mr. Kashif ullah	W/O Fazal Kabir	Chowkidar	Retire son quota
08	Mst. Shazia Naz	S/O Ismail	Lab; Attendant	Open Merit
		D/O Aqal Mand		

Terms & conditions;

1. They would be on probation for the period of one year extend-able for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time the Government.
3. Their service can be terminated at any time in case the performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Their service is liable to terminated on one month prior notice from either side. In case of resignation without prior notice one month pay and allowances, if any, shall be forfeitd in favour of Govt; through challan.
5. They should join their post within 15 days of the issuance of this order positively otherwise the appointment shall stand cancelled automatically.
6. The principal concerned should personally checked their original documents, domicile and CNIC before handing over charge.
7. Health and age certificate from the medical superintendent should be provided before taking over charge.
8. Charge report should be submitted to all concerned.
9. No TA/DA etc, shall be allowed to the appointees for joining their duties.
10. They will be handed over charge if the age is less than 18 and above 43 years.

Note: 02 seats i.e. 1 chowkidar & 1 Lab Attendant reserved for the retired son quota. Application for lab attendant (Retired son quota) is not available. Therefore, post of Labor try attendant is filled from open merit.


*[Signature]*  
Principal

*[Signature]*  
Principal  
Govt; Girls Degree College  
Khwazakhela Distt; Swat



Endst: No 141-182/GGDC:KK;/Appointment of Class-IV/ Dated 15-03-2016

1. Director Higher Education Khyber Pakhtun khwa Peshawar.
2. Co-Ordinator Cluster colleges Saidu Sharif District Swat.
3. Manager Employment Exchange Mingora District Swat.
4. District Comptroller of accounts District Swat at Saidu Sharif.
- 5-12. Official concerned

  
Principal  
Govt; Girls Degree college  
Khwaza Khela Distt; Swat



Letter No. 111-12-10010 KK. Appointment of Class-I in District 2-03-010

- 1. Director Higher Education Khyber Pakhtunkhwa Peshawar
- 2. Co-ordinator Cluster colleges Saidu Sharif District
- 3. Manager Technical Education Miranshah District Saidu
- 4. District Controller of Accounts District Saidu Sharif
- 5. Official concerned

Principal  
Govt. Girls Degree College  
Saidu Sharif District



**Office of the Principal**  
**GOVERNMENT POST GRADUATE JAHANZEB COLLEGE**  
**SAIDU SHARIF SWAT**



10

No. \_\_\_\_\_ /transfer/adjusted /J-21

Dated: 10/9/2021

**OFFICE ORDER**

*Amir B*

As per recommendation of both Principals, Mr. Kashifullah Chowkidar BPS-3 Govt. Girls Degree College Khwazakhela District Swat is hereby transferred/ adjusted at Govt. Degree College Khwazakhela District Swat on his own pay and scale against the leave vacancy.

No TA/DA is allowed.

*Sd/*  
Principal,  
Govt. PG Jahanzeb College,  
Saidu Sharif Swat.

Endst: No. 1904-7 /J-21

Copy to:-

1. Principal Govt. Girls Degree College Khwazakhela District Swat.
2. Principal Govt. Degree College Khwazakhela District Swat.
3. District Comptroller of Accounts Swat at Saidu Sharif.
4. Official Concerned.
5. File.

*Noted*  
*dt: 11/09/2021*  
*[Signature]*

*[Signature]*  
Principal,  
Govt. PG Jahanzeb College,  
Saidu Sharif Swat.

**Attested**  
*[Signature]*  
**Advocate**

درخواستیں مطلوب ہیں۔

دیر دستخطی کو گورنمنٹ ڈگری کالج خوازہ ضیلہ سوات میں لیبارٹری انٹرنڈنٹ  
آسامی ترقی کے لیے خواہش مند افراد سے درخواستیں مطلوب ہیں۔ جو کہ سادہ  
کاغذ پر بنا کر پرنسپل گورنمنٹ ڈگری کالج خوازہ ضیلہ، یہ وسالت دفتر روزگار  
بمقام پانٹر سنگھ سوات سواض، 24 ستمبر 2022 بہ روز ہفتہ تک دفتری  
اوقات کار میں پہنچ جانے چاہیے۔

نام آسامی : تعداد آسامی : سکین

لیبارٹری انٹرنڈنٹ - 01 - 03

قوائد و ضوابط : (1) امیدوار مرد ہو اور درجیل سوات کا مستقل باشندہ ہو۔

(2) درخواست کے ساتھ دفتر روزگار رجسٹریشن کارڈ منگ (کڑا نمبر دی ہے)

(3) انٹرویو کے دن دو ج ذیل اصل کاغذات لانا ضروری ہے۔

(i) رجسٹریشن کارڈ ( دفتر روزگار )

(ii) شناختی کارڈ

(iii) ڈومیسائل سرٹیفکیٹ

(iv) تجربہ سرٹیفکیٹ ( اگر کوئی ہو )

(v) تعلیمی اسناد ( اگر کوئی ہو )

(4) انٹرویو / سلیکشن کے لیے بعد میں فراہم کردہ میٹریل نمبر پر اطلاع دی  
دی جائے گی۔

(5) انٹرویو کے لیے آنے والوں کو کوئی سفر خرچ / ایسے نہیں دیا جائے گا۔

*Seal*

2022/09/24

پرنسپل گورنمنٹ ڈگری کالج  
خوازہ ضیلہ سوات

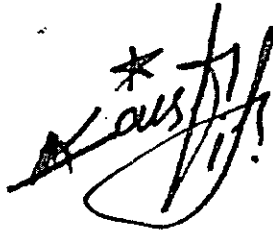
نوٹ : دو ج بالا نوٹس کے مقول کالج کے لانس بورڈ  
سے سینڈ، تحصیل، عدالتوں اور دیگر مشروف اور  
مشروف جگہوں پر لگانے جانے سے متعلقہ علاقہ کے زیادہ  
سے زیادہ امیدوار درخواستیں دے سکیں



## Arrival report

In compliance with JMC office order Endst: No 1301-02/J, Dated 02-09-2022 ( received on 06-09-2022 ). I Kashif Ullah Lab: attendant here by submit my arrival report for duty against the post of Chowkidar BPS-03 at Government Girls Degree College Khwaza khela swat.

Kashif Ullah



Lab attendant

GGDC KK

Date: 16-09-2022

Attested  
Advocate

(13)



14

## CHANGE ALERT - 16.09.2022

(00767412 - KASHIF ULLA



Inbox



Employee Servi... 4 days ago

to me v



00767412

KASHIF ULLAH

SW5208

Action Performed	
	LEAVING ACTION PERFORMED (SALARY STOPPED) with effect from 01.09.2022
Office Details	
	DESIGNATION CHANGED to 99999999 - CERTIFIED TEACHER

یہ ای میل خودکار نظام کے تحت بھیجی جا رہی ہے جس کا مقصد  
 ڈی ڈی او کو ملازمین کی چینجز سے متعلق ہر وقت مطلع کرنا ہے۔  
 اگر اس ای-میل میں شامل ملازمین کی چینجز میں کوئی غلطی  
 پائی جا رہی ہو، تو جلد از جلد اپنے متعلقہ اکاؤنٹ آفس سے رابطہ  
 کر کے درستگی کروا لیں







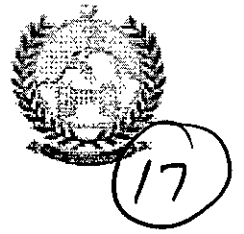
16

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave to average pay into four months for which leave salary is payable to another Government		
Signature and Designation of the head of the office or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government in which payable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or leave or reward or bonus of the Government service
 PRINCIPAL GGDC K. Khela Swat	30/11/2020	Annual Increment Rs. 390	 PRINCIPAL GGDC K. Khela Swat			Service Verified w.e.t. 01-12-2019 to 30-11-2020 from acq. Rolls and other record of this college	 PRINCIPAL GGDC K. Khela Swat
 PRINCIPAL GGDC K. Khela Swat	10/09/2021	Transferred to GDC Khwaza Khela (Boys) Swat	 PRINCIPAL GGDC K. Khela Swat			Transfer from Govt. Girls Degree College Khwaza Khela Swat to Govt. Degree College Khwaza Khela (Boys) vide cluster coordinator Govt. P.O. Jahanzeb Talley Saidu Sharif Swat Endst: No. 1904-7/J-21 dt: 10/09/2021.	 PRINCIPAL GGDC K. Khela Swat
 PRINCIPAL GGDC K. Khela Swat	11/05/2021		 PRINCIPAL G.D.C. Khwazakhela Swat			Service Verified w.e.t. 01-12-2020 to 10-09-2021 from acq. Rolls and other record of this college	 PRINCIPAL GGDC K. Khela Swat
						Transfered to this college from GDC K. Khela vide Endst No. 1904-7 Dated 10-09-2021 issued by JMC coordinator S/Sharif Swat.	
						1. 130 8/11/2021	
						Drawn arrears of Pay 5 (14) w.e.t. 11-5/10 31-10	
						@B-43935/ pay adv @B-26376/1	
						Service Verified w.e.t. 11-09-2021 to 30-11-2021 from acq. Roll & Other Record in this Office.	 PRINCIPAL GGDC K. Khela Swat
							 PRINCIPAL GGDC K. Khela Swat

Attested  
  
Advocate

Government of Khyber Pakhtunkhwa  
District Accounts Office SWAT  
Monthly Salary Statement (August-2022)

*Amir*



**Personal Information of Mr KASHIF ULLAH d/w/s of ISMAIL**

Personnel Number: 00767412 CNIC: 1560254021575  
Date of Birth: 06.06.1996 Entry into Govt. Service: 15.03.2016

NTN:  
Length of Service: 06 Years 05 Months 018 Days

**Employment Category: Active Temporary**

Designation: LABORATORY ATTENDANT 80692810-GOVERNMENT OF KHYBER PAKH  
DDO Code: SW5208-District Swat  
Payroll Section: 003 GPF Section: 001 Cash Center:  
GPF A/C No: 767412 GPF Interest applied **GPF Balance:** 71,329.00 (provisional)  
Vendor Number: -  
**Pay and Allowances:** Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 03 Pay Stage: 6

Wage type		Amount	Wage type		Amount
0001	Basic Pay	17,740.00	1001	House Rent Allowance 45%	2,120.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
1911	Compen Allow 20% (1-15)	1,000.00	2148	15% Adhoc Relief All-2013	168.00
2199	Adhoc Relief Allow @10%	163.00	2311	Dress Allowance - 2021	1,000.00
2312	Washing Allowance 2021	1,000.00	2313	Integrated Allowance 2021	600.00
2341	Dispr. Red All 15% 2022KP	1,792.00	2347	Adhoc Rel Al 15% 22(PS17)	1,792.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-600.00
3534	R. Ben & Death Comp Fresh	-300.00	3990	Emp.Edu. Fund KPK	-60.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

**Deductions - Income Tax**

Payable: 0.00 Recovered till AUG-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 30,660.00 Deductions: (Rs.): -1,730.00 Net Pay: (Rs.): 28,930.00**

Payee Name: KASHIF ULLAH  
Account Number: 1359  
Bank Details: THE BANK OF KHYBER, 080164 Mouza Main Bazar Matta Mingora, SWAT

**Leaves:** Opening Balance: Aailed: Earned: Balance:

Permanent Address:  
City: KHWAZA KHELA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
Temp. Address:  
City: Email: kashifullah0001@gmail.com

*Attested*  
*[Signature]*  
**Advocate**



OFFICE OF THE PRINCIPAL/CLUSTER COORDINATOR  
GOVERNMENT POST GRADUATE JAHANZEB COLLEGE  
SAIDU SHARIF SWAT



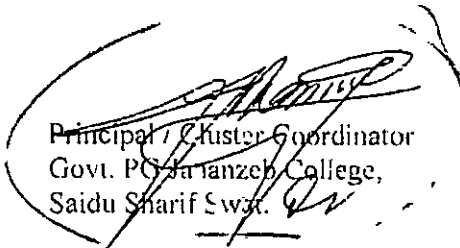
18

OFFICE ORDER

Consequent upon the mutual consent of the Principals, of GDC Khwazakhela and GGDC Khwazakhela Mr. Kashifullah Chowkidar BPS-3 working against the leave vacancy at GDC Khwaza Khela Swat is hereby transferred and adjusted at Govt. Girls Degree College Khwazakhela District Swat on his original post scale & BPS w.e.f. 01/09/2022.

Furthermore he is directed to actualize the post at GGDC Khwazakhela and then report for duty to the newly established GDC Charbagh Distt Swat till further order.

No TADA is allowed.

  
Principal / Cluster Coordinator  
Govt. PG Jahanzeb College,  
Saidu Sharif Swat.

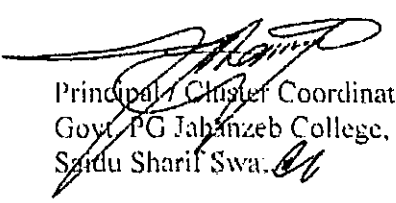
OFFICE OF THE PRINCIPAL/CLUSTER COORDINATOR GOVT PG JAHANZEB COLLEGE

Endst: No. 301-02 /J-22

Dated: 02/09/2022

Copy to:-

1. Principal Govt. Girls Degree College Khwazakhela District Swat with the remarks to relieve the employee under intimation to this office.
2. Principal Govt. Degree College Khwazakhela District Swat with reference to letter No. 346/Kashifullah/GDCKK/22
3. Principal GDC Charbagh Distt Swat with reference to his request due to non-availability of Class-IV at newly established College
4. District Comptroller of Accounts Swat at Saidu Sharif.
5. Official Concerned.
6. File.

  
Principal / Cluster Coordinator  
Govt. PG Jahanzeb College,  
Saidu Sharif Swat.





OFFICE OF THE PRINCIPAL/CLUSTER COORDINATOR,  
GOVERNMENT POST GRADUATE JAHANZEB COLLEGE  
SAIDU SHARIF SWAT



OFFICE ORDER

The Designation of Mr. Kashifullah was reported by the Principal GDC Khwazakhela Swat vide his letter No. 346/Kashifullah/GDC KK/22 dated 27-08-2022 is Chowkidar , who was transferred to GGDC Khwazakhela in the aforesaid cadre vide this office order Endst No. 1301-02/J22 dated 02/09/2022 . However, on his appeal and payroll was found that his post is that of the Lab Attendant (BPS-3) instead of Chowkidar (BPS-3), which proved that the Principal misled this office. consequently, the transfer issued is hereby withdrawn/cancelled.

1501/  
Principal / Cluster Coordinator  
Govt. PG Jahanzeb College,  
Saidu Sharif Swat.

OFFICE OF THE PRINCIPAL/CLUSTER COORDINATOR GOVT PG JAHANZEB COLLEGE

Endst: No. 1377-60/J-22

Dated: 07/09/2022

Copy to:-

1. Director, Higher Education Khyber Pakhtunkhwa Peshawar
2. Principal Govt. Girls Degree College Khwazakhela District Swat
3. Principal Govt. Degree College Khwazakhela District Swat
4. Principal GDC Charbagh Distt Swat
5. District Comptroller of Accounts Swat at Saidu Sharif.
6. Official Concerned.
7. File.

Attested  
  
Advocate

Principal / Cluster Coordinator  
Govt. PG Jahanzeb College,  
Saidu Sharif Swat.

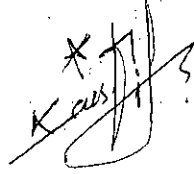
بخدمت جناب پر نسیل صاحب گورنمنٹ ڈگری کالج خوازہ خیلہ سوات

عنوان:- ( فراہمی دستاویزات تقرری بحیثیت لیب اٹینڈینٹ)

اجنباب عالی

گزارش کی جاتی ہے کہ بندہ گورنمنٹ ڈگری کالج خوازہ خیلہ میں بحیثیت چوکیدار ڈیوٹی سرانجام دے رہا تھا جسکے بعد بندہ کی تقرری بحیثیت لیب اٹینڈینٹ کی گی۔ لہذا آپ صاحبان مہربانی کر کے بندہ کو بحیثیت لیب اٹینڈینٹ تقرری کی دستاویزات فراہم کرے تو بہت مہربانی ہوگی

فقط



آپکا تابعدار

کاشف اللہ

لیب اٹینڈینٹ

گورنمنٹ گرلز ڈگری کالج خوازہ خیلہ

تاریخ 2022-09-19

Accepted  
Kashaf Allah  
4/10/2022

A. J. F.  
APPELLANT

(21)

**BEFORE THE DIRECTOR HIGHER EDUCATION DEPARTMENT**

**PESHAWAR**

Kashif Ullah Lab Attendant Currently Chowkidar at Government Degree College Charbagh, District Swat. ....Appellant

***VERSUS***

Principal Government Degree College Khwaza Khila, District Swat.


.....Respondent

Subject: **Departmental appeal against the order No. 360-363/Kashif Ullah/GDCKK/22 dated 12-09-2022.**

Respected Sir,

The Appellant submits as under;

- 1) That the Appellant was appointed as Chowkidar at GGDC Kwaza Khila Swat.
- 2) That the Appellant was then transferred to GDC Khwaza Khila and performed his duties as Chowkidar at GDC Khwaza Khila.
- 3) That the Principal made my permanent order of Lab Attendant as he was authority.
- 4) That the Appellant then started his duties as Lab Attendant and got the salary of it also.
- 5) That by order Endst: No. 1301-02 / J-22 dated 02-09-2022 I was again transferred to GGDC Khwaza Khila and then to GDC Charbagh on the post of Chowkidar.
- 6) That the Principal of Jehanzeb College then canceled the above order by order Endst: No. 1377-80/J-22 dated 07-09-2022 and wrote that the Principal has misled him as the Principal Jehanzeb College is Cluster Coordinator.

**Attested**  
  
**Advocate**

- 7) That once more the Principal GDC Khwaza Khila issued order No. 360-363/Kashif Ullah/GDCKK/22 dated 12-09-2022 and directed me to report for the post of Chowkidar against the order of the Principal Jehanzeb College.
- 8) That my post is now as Lab Attendant and not Chowkidar but the Principal GDC Khwaza Khila is not accepting the same.

It is thus very humbly requested that on acceptance of this departmental appeal I may be posted as Lab Attendant back at GDC Khwaza Khila or even at GGDC Khwaza Khila but as Lab Attendant.

*Kashif Ullah*  
Appellant 19-9-22

Kashif Ullah  
Lab Attendant

Affidavit:

It is solemnly stated on oath that all the contents of this departmental appeal are true and correct to the best of my knowledge and belief.

*Kashif Ullah*  
Deponent 19-9-22

Kashif Ullah



Attested  
*[Signature]*  
Notary





OFFICE OF THE  
CLUSTER COORDINATOR / PRINCIPAL  
GOVERNMENT POSTGRADUATE JAHANZEB COLLEGE  
SAIDU SHARIF, DISTRICT SWAT

Phone: 09469240192

Email: jahanzebcollege1@gmail.com

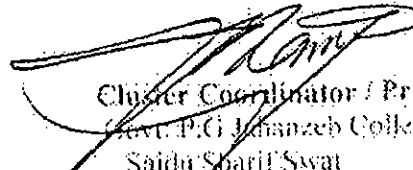
December 15, 2022

23

OFFICE ORDER

Consequent upon the comprehensive report of the Principal Govt Degree College Khwaza Khela Swat communicated to the Director Higher Education Khyber Pakhtunkhwa Peshawar vide letter No. 380/Kashif Ullah/GDCKK/22 dated 21-09-2022 and subsequently, the directives of the Director Higher Education issued to the undersigned vide letter No. 22050/CA-VII/Estt/Branch/A-167/GDC Khwaza Khela Swat dated 15-11-2022 in connection with Mr. Kashifullah Chowkidar of GGDC Khwaza Khela Swat.

As a result of the detailed analysis of the irrefutable and valid service record of the official, submitted by the Principal concerned, the Office Order issued vide this office Endst No. 1377-08/22 dated 07-09-2022 is hereby cancelled and the previous order issued vide this office Endst No. 1301-02/22 dated 02-09-2022 is maintained which has already been complied with by the official and relinquished the charge. The official is directed to report for duty to the Principal Govt Girls Degree College Khwaza Khela Swat, if not reported earlier.

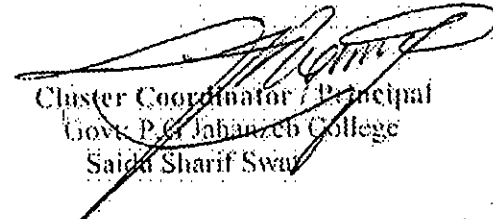
  
Cluster Coordinator / Principal  
Govt. P.G. Jhanzeb College  
Saidu Sharif Swat

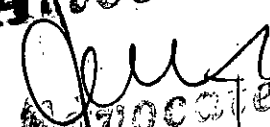
Endst No. 1935-79 Kashifullah/2022

Dated: 15-12-2022

Copy for information to:

- 1- The Director Higher Education Department Khyber Pakhtunkhwa Peshawar
- 2- The District Accounts Officer Swat at Saidu Sharif
- 3- The Principal Govt Degree College Khwaza Khela Swat
- 4- The Principal Govt Girls Degree College Khwaza Khela Swat
- 5- The official Concerned
- 6- Office Record

  
Cluster Coordinator / Principal  
Govt. P.G. Jhanzeb College  
Saidu Sharif Swat

**Attested**  
  
Advocate

In the matter of:-

کاشنوالہ  
Appellant

VERSUS

گورنمنٹ و سروس  
Respondent

SCANNED  
KPST  
Peshawar

KNOWN ALL to whom these present shall come that I/we, the undersigned appoint

**AZIZ-UR-RAHMAN and IMDAD ULLAH**

Advocates High Court

To be the advocate for the Appellant in the above mentioned case to do all the following acts, deeds and things or any one of them, that is to say:-

- ❖ To acts, appear and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or revision or execution or at any other stage of its progress until its final decision.
- ❖ To present pleadings, appeals, cross objections or petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of the said case in all its stages.
- ❖ To withdraw or compromise the said or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- ❖ To receive money and grant receipts therefore, and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
- ❖ To employ any other Legal Practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate wherever he may think fit to do so.
- ❖ I understand that the services of aforesaid lawyer are hired irrespective of the outcome of the case.

And I/We hereby agreed to ratify whatever the advocate or his substitute shall to do in the said premises.

And I/We hereby agree not to hold the Advocate or his substitute responsible for the result of the said case in consequences of his absence from the Court when the said case is called up for hearing.

And I/We hereby agree that in the event of the whole or any part of the fee agreed by me/us to be paid to the Advocate remaining unpaid, the Advocate shall be entitled to withdraw from the prosecution of the case until the same is paid.

IN THE WITNESS WHEREOF I/WE hereunto set my/our hand(s) to these present the contents of which have been explained to and understood by me/us, this 15 day of 09 2022

(Signature or thumb impression)

(Signature or thumb impression)

(Signature or thumb impression)

Accepted subject to terms regarding fees

AZIZ-UR-RAHMAN)

Advocate High Court

Office: Khan Plaza, Gulshone Chowk

Road Mingora, District Swat.

No. 0300 907 0671

(IMDAD ULLAH)

Advocate High Court

Office: Khan Plaza, Gulshone Chowk,

G.T. Road, Mingora, District Swat

Cell No. 0333 929 7746

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

Service Appel No. 1885/2022

Kashifullah.

**...Applicant/Appellant**

**VERSUS**

The Secretary Higher Education Department, Peshawar and Others.

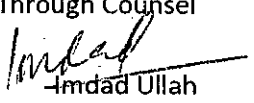
**...Respondents**

**APPLICATION FOR PLACING ORDER DATED 12-09-2022 ON FILE.**

Respectfully Sheweth:

- i. That the above titled service appeal is pending adjudication before this Honourable Tribunal and is fixed for today.
- ii. That while filling the service appeal the order No. 360-363/Kashif Ullah/GDCKK/22 dated 12-09-2022 was inadvertently not annexed.
- iii. That the order dated 12-09-2022 is the impugned order and without the same just decision is not possible.

It is, therefore, very respectfully prayed that on acceptance of this application the above mentioned order may very kindly be order to be placed on file.

Applicant  
Through Counsel  
  
Imdad Ullah  
Advocate Swat

**GOVERNMENT DEGREE COLLEGE KHWAZA KHELA SWAT**


Tel: 0946-744411 Facebook: @gdckhwazakhstanswat Email: gdckhwazakhstan@gmail.com



No. 360-363/Kashif Ullah/GDCKK/22


Dated: 12/09/2022

As per telephonic conversation with PS to Minister for Higher Education and reference this office letter No. 359/Kashif Ullah/GDCKK/22, Dated: 12/09/2022 you Mr. Kashif Ullah, Chawkidar GGDC Khwaza Khela, is directed to report at your original post as Chawkidar GGDC Khwaza Khela Swat, with immediate effect.

  
Principal  
Government Degree College,  
Khwaza Khela Swat.

Copy for information to the:

1. Coordinator/ Principal, Govt: PG Jahanzeb College, Saidu Sharif Swat.
2. Principal, GGDC Khwaza Khela Swat.
3. PS to Minister for Higher Education, Khyber Pakhtunkhwa, Peshawar.

  
Principal  
Government Degree College,  
Khwaza Khela Swat.