# DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA

RANO GARHI, NEW CHAMKANI CHOWK, PESHAWAR Tel # 091-2650024/ Fax # 091-2260181

E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

No. DHE/AD (Lit)/SA/

Dated Peshawar the 2 &

Dated 29-8-2

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To ·

The Principal,

Govt. Degree College, Mathra,

Peshawar.

Attention.

Mr. Sohrab (litigation-II)

SUBJECT: - SA NO. 1397/2019 IKRAM ULLAH & OTHERS VERSUS GOVT: OF

KHYBER PAKHTUNKHWA

Memo:

I am directed to refer to the Section Officer (Litigation-II) letter No. SO(Lit)HED/4-9/2020/SA-1192-1397/2019/6985 dated 18.08.2023 on the subject cited above and to enclose herewith 4 sets of inquiry alongwith annexures with the remarks to submit the same in tribunal on the date fixed for hearing, please

Note:

Being court matter may be given priority.

(Qubna Farman)

Assistant Director (Litigation)

Endst No.

Copy of the above is forwarded to the Section Officer (Litigation) Higher Education Department w/r to his mentioned above letter.

Assistant Director (Litigation)

Date: 18/10/2:18

То

The Secretary,
Higher Education, Archives & Libraries Deptt:
Govt. of Khyber Pakhtunkhwa, Peshawar.

SUBJECT: INQUIRY REPORT AGAINST THE OFFICERS/ OFFICIALS

CREATING DISTURBING ENVIRONMENT AT GOVERNMENT

DEGREE COLLEGE KHAN KHOI(NOWSHERA).

Memo:

Enclosed please find herewith an inquiry report in the subject matter for further necessary action at your end, please.

for

Mr. Zafar Iqbal (PCS EG BS-21)

Secretary

Science &Information Technology

Khyber Pakhtunkhwa,Peshawar

Same 201X

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#### INQUIRY REPORT

Subject:

DISCIPLINARY PROCEEDINGS AGAINST THE OFFICER/OFFICIALS
CREATING DISTURBING ENVIRONMENT AT GOVERNMENT DEGREE
COLLEGE KHAN KOHI(NOWSHERA)

#### CONDUCTED BY

- 1. **Zafar Iqbal** (PCS EG BS-21), Secretary Science & information Technology Khyber Pakhtunkhwa, Peshawar
- Prof.Dr.Abdur Rashad (Principal),
   Govt. Degree College Wadpagga Peshawar.

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#### **INQUIRY REPORT**

SUBJECT: DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS/OFFICIALS CREATING DISTURBING ENVIRONMENT AT GOVERNMENT DEGREE COLLEGE KHAN KHOI(NOWSHERA).

#### BACKGROUND:

Mr. Sher Bahadar Khan, Ex Principal Govt. Degree College Khan Khoi, Mr. Abid Hussain Associate Professor of Statistics at Govt. Degree College Khan Khoi and Mr. Ikram Ullah Lecturer in Pashto, Govt. Degree College Khan Khoi were transferred from their station vide Provincial Government Notifications No. SO(E-I)/E&AD/9-88 Dated 14-11-2017, SO (E-I)/E&AD/9-88/2017 Dated 13-6-2017 and SO(Colleges-II)HED/2-5/2017/2870-2957 Dated 07-02-2017 respectively. The officers showed resistance in compliance of the order of the Provincial Government which put the educational atmosphere of the college into the state of disarray. Thus Department was compelled to initiate disciplinary proceedings against them and hence a summary was moved for the approval of the Competent Authority.

- The Chief Secretary being the Competent Authority as per amendments in Khyber Pakhtunkhwa Govt. Servants (E&D) rules 2011 has constituted inquiry committee comprising of Mr. Zafar Iqbal OSD E&AD and Dr. Abdur Rashad Principal Govt. Degree College Wadpagga vide Higher Education Archives & Libraries Department Letter No. SO(C-I)HE/1-5/2018/Summary for CM/Sher Bahadar Dated Peshawar the 30/07/2018 (Annex-I) to conduct a formal inquiry against the accused officers and to submit a report thereof to Department for appropriate necessary action.
- 3. Gist of charges/ statement of allegations leveled against the accused officers are given below.
  - i. The services of Mr. Sher Bahadar were placed at the disposal of FATA Secretariat and directed through reminders to comply the order, but due to non-compliance, he put the college environment in to state of disarray.
  - ii. Mr. Abid Hussain and Mr. Ikramullah were transferred and consequently relieved by the Principal, but they showed resistance in implementing Govt. Orders, either by making one excuse or the other and thus put the whole college environment into a state of disarray.

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#### **PROCEEDINGS:**

- The enquiry committee communicated the charge sheet to the accused officers and directed to submit their written reply within the stipulated time mentioned in the charge sheet. Furthermore, they were also summoned to appear before the committee on 16-8-2018 (Annex-II) regarding charges leveled vide ibid charge sheet and statement of allegation. The Directorate of Higher Education was also asked to depute Departmental representative, along with relevant record to assist committee during inquiry proceedings. In compliance, the accused officers submitted their written defense and are placed at Annex-III, Annex-IV and Annex-V.
- 5. The inquiry committee called the accused officers for personal hearing on 25-09-2018 as they have shown their desire to being heard in person. Statements of Departmental representative and the accused officers are reproduced below:

# I. STATEMENT OF DEPARTMENTAL REPRESENTATIVE MR. IMRAN ASSISTANT DIRECTOR DIRECTORATE OF HIGHER EDUCATION (ANNEX-VI)

The Departmental Representative categorically informed that to maintain congenial environment in the College, these officers were transferred on administrative grounds

# II. STATEMENT OF MR. SHER BAHDAR KHAN EX- PRINCIPAL GOVT. DEGREE COLLEGE KHAN KHOI NOWSHERA. (ANNEX-VII)

He stated that he submitted his arrival to the FATA Secretariat on 20-11-2017 in compliance of Provincial Government Notification, however due to observance of technical lacunas in the procedure adopted for the transfer, he submitted appeal to Chief Secretary for cancellation of his order as well as civil suit was also filed against the transfer order in the Civil Court Nowshera. Furthermore, shouldering of additional responsibilities for operationalizing newly established Govt. Girls Degree College Khan Khoi Nowshera was another reason which refrain him to take the charge within stipulated time period.

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# III. STATEMENT OF MR. ABID HUSSIAN ASSOCIATE PROFESSOR OF STATISTICS (BS-19) GOVT. DEGREE COLLEGE DAGGAR BUNER (ANNEX-VIII)

In his statement, he clearly shown his ignorance about his transfer, as no such Notification has been shared with him due to ongoing summer vacation in the college. Furthermore, he submitted an application to the Secretary Higher Education for release of his salary which was stopped by the college administration by relieving him in absentia on 1-7-2017. The application was entertained on 19-4-2018 and in compliance, he left the charge at GDC Khan Khoi Nowshera on 11-5-2108.

# IV. STATEMENT OF MR. IKRAM ULLAH LECTURER IN PASHTO GOVT. DEGREE COLLEGE KHAN KHOI PESHAWAR (ANNEX-IX)

The accused officer was of the view that his transfer was against the prevailing policy as he only spent year and half in the said college. Aggrieved of the situation filed an appeal against the Transfer Notification in the Civil Court Nowshera on 10-02-2017 whereby the august court has issued temporary injunction in favour of him. Furthermore, the incumbent also approached the Khyber Pakhtunkhwa Service Tribunal for relief and the case is still pending there and the tribunal has also directed to maintain the status quo. He also expressed his concerns over his personal and family security from the militants being the domiciled of District Bajur. Latter on keeping in view the best interest of the public he relinquished the charge from the post of Lecturer at Govt. Degree College Khan Kohi, Nowshera on 07-09-2018

### **FINDINGS:**

- 6. The committee perused the available record, and the arguments submitted by the accused officers and ascertain the following factual positions
- Mr. Sher Bahadar Khan Ex- Principal Govt. Degree College Khan Kohi could not assumed the charge at FATA within the stipulated time period, as Civil Court Nowshera has suspended the order of the Provincial Government. Meanwhile he filed an appeal to the Chief Secretary Khyber Pakhtunkhwa for non-observance of requisite procedure for transfer from settled to FATA. Latter on he withdrawn his case from the court on 6-2-18 and relinquished the charge on 18-04-2018 from the post of Principal Govt. Degree College Khan Kohi (Nowshera) after a lapse of almost two and half month. The charge against the accused officer has partially been proved.

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- 8. Mr. Abid Hussain Associate Professor of Statistics BS-19 Govt! Degree College Daggar Buner, try to dodge the committee by presenting his ignorance regarding his transfer, however, during the course of cross questioning and the perusal of the record available with the Departmental Representative, it was clearly observed that accused officer was well aware of his transfer. He approached different quarters for the cancellation of his transfer as well as release of salary (Annex- X & Annex-XI) before complying the orders of the Provincial Government. The charges against the accused officer have been proved.
- Pashto BS-17 Govt. Degree College Khan Kohi Nowshera that temporary injunction has been issued in favor of him by the Civil Court Nowshera against his transfer is baseless, however, it has been acknowledged that Khyber Pakhtunkhwa, Service Tribunal has granted status quo in favor of him on 24/5/2017. Although the officer concerned has complied the orders of the Provincial Government on 07-09-2018 by relinquishing the charge from the post of Lecturer in Pashto at Govt. Degree College Khan Khoi Nowshera, however, the case is still pending in Khyber Pakhtunkhwa Service Tribunal, Peshawar. The charges against the accused officer have been proved.

#### RECOMMENDATIONS.

Since the charge against Mr. Sher Bahadar, Principal has partially been proved, therefore minor penalty of "Censure" is recommended. So far as Mr. Abid Hussain and Ikramullah is concerned, the charges against both the accused have been proved as they have not complied with the order of Provincial Government, therefore minor penalty of withholding of 02 increments for the period of 02 years is recommended to be imposed upon both the accused officers.

Mr. Zafar Iqbal (PCS EG BS-21)

\ Se@retary/

Science & Information Technology

KPK, Peshawar

Prof. Dr. Abdur Rashad Principal

GDC wadpagga, Peshawar

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He sefrestet for adjournment Mr. 9 H Bamul Lain, Laterson Aby Hussen, Associate Mr. Sher Bocharder, Porfessor of Statestors (Ex- Powerpa) ADC Dagger Burea absect. on neath lette.

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#### GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT CIVIL SECRETARIAT

NO.SO(C-I)HE/1-5/2018/Summary, for CM/Sher Bahadar Dated Peshawar the 30/07/2018

Τo

Mr. Zafar Iqbal (PCS EG BS-21), OSD E&AD, Arif Hussaini Street, Faisal Colony, GT Road, Peshawar (

Prof. Dr. Abdur Rashad, Principal, Government Degree College, Wadpagga (Peshawar).

Subject:

DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS **ENVIRONMENT** DISTURBING GOVERNMENT DEGREE COLLEGE, KHAN KOHI (NOWSHERA).

Respected Sir.

I am directed to refer to the subject cited above and to state that the competent authority (Chief Secretary) has been pleased to appoint you as Enquiry Officer(s)/Committee regarding the subject case. The Charge Sheet and Statement of Allegations are enclosed herewith to be served upon the accused officer. Copy of the approved summary in this respect is also

enclosed. It is, therefore, requested to kindly conduct an enquiry against the accused office and furnish report thereof to this Department within thirty days, please.

Encl. As above.

Yours faithfully

SECTION OFFICER (COLLEGE

## <u>ENDST: NO. & DATE EVEN.</u>

Copy forwarded to the:

Copy to the Director, Higher Education Khyber Pakhtunkhwa Peshawar with request to depute a well conversant representative of the Directorate of Higher Education alongwith relevant record, to assist the Enquiry Officer during the enquiry proceedings. wh desired by the committee.

SECTION OFFICER (COLI

Dated: 9/8/2018

To

- Mr. Sher Bahadur, Professor of Statistics / Ex- Principal (B-20), GDC Khan Kohi, Nowshera.
- Mr. Abid Hussain, Assot: Prof. of Statistics (B-19), GDC Daggar Buner.
- 3. Mr. Ikramullah, Lecturer in Pushto (B-17), GDC Khan Kohi, Nowshera.

Subject:

OFFICIALS CREATING DISTURBING ENVIRONMENT IN GOVERNMENT DEGREE COLLEGE, KHAN KOHI (NOWSHERA)

Memo,

Refer to the Government of Khyber Pakhtunkhwa, Higher Education Archives and Libraries Department, Civil Secretariat vide letter No. SO(C-1) HE/1-5/2018/Summary for CM/Sher Bahadar/1134-36/WE dated Peshawar the 30-07-2018 and to enclose herewith a copy of the charge sheet and statement of allegations on the subject matter.

You are directed to submit your written defense to the enquiry committee within the stipulated period mentioned in the charge sheet. You are also hereby directed to attend the enquiry office at Establishment Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar on thursday dated 16-08-2018 at 11:00 AM for enquiry proceedings with regards to charges levelled against you vide ibid charge sheet and statement of allegations.

Mr. Zafar Iqbal (PCS EG BS-21), Solution OSD, E & AD, Arif Hussaini Street, Faisal Colony, GT Road Peshawar

Endst: Even no and date Copy forwarded to the:

Director, Higher Education Khyber Pakhtunkhwa Peshawar with the request to depute well versed officer along with all relevant records to assist enquiry committee and also inform the afore-mentioned officers to attend the proceedings as per ibid schedule

7

Mr. Zafar Iqbal (PCS EG BS-21),

OSD, E & AD, Arif Hussaini Street, Faisal Colony, GT Road Peshawar

# CERTIFICATE OF TRANSFER OF CHARGE

7. Certified that we have on the 11-05-2018 (AN) respectively handed over the charge of the office of the Associate Professor Government Degree College Khan Kohi (Nizampur), vide Notification No. SO(E-1)E&AD/9-88/2017 dated, 13-06-2017.

8. Particular of cash and important secret and confidential documents handed over are noted on the reverse.

Star on all K. & had Kolin	
Dated: 11-05-2018	Signature of Relieved Gooding And
	A.
	Name: Abid Hussain
	Designation, Associate Professor
• • • • • • • • • • • • • • • • • • • •	
	Signature of Relieving Govt. Servant
	Vacant Name:

Designation

# OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE KHAN KOIH (NIZAMPUR)

Endst No 150-154

Dated 11-5-2-018

Copy to:

- 6. The Director Higher Education Govt. Khyber Pakhtunkhwa Peshawar
- 2. The section Officer Higher Education Govt. Khyber Pakhtunkhwa Peshawar
- 3. The District Account Officer Nowshera
- The Officer Concerned
- 5. Personal-File.

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The Inquiry Officer / Inquiry Committee,

Subject:

# REPLY TO CHARGE SHEET COMMUNICATED TO THE UNDERSIGNED ON 16-08-2018

### Respectfully Submitted,

- 1. That the undersigned has been initially appointed as a lecturer on 10-12-1988.
- 2. That during the course of service the undersigned remain at different stations and ever since appointment performed his duties with zeal and devotion and without any complaint whatsoever with regard to his duties.
- 3. That lastly the undersigned has been posted at Govt. Degree College Daggar Buner.
- 4. That the undersigned at the vary out set denies and refuted the allegations leveled against him being baseless and against the facts.

### CHARGE NO 1:

- i. Charge No.1 is false and against the facts. Neither I have received any sort of letters through Govt Post Office nor I have been informed through any means, whatsoever, otherwise, my sign of receiving the letter would be there under the rules invogue.
- ii. The relieving in absentia should have been communicated to me by GMC or otherwise, the principal of GDC Khan Kohi did not inform me through any means about the letters issued from the Directorate of Higher Education about the compliance of order. The undersigned has always been punctual towards his

duties and attended all the classes he has been given. That the undersigned never committed any act or omission which could be termed as mis conduct. That the undersigned would also like to be heard in person.

Rather, I was informed by librarian of the college Mr. Zahir Ullah that the principal have banned you to enter into the college and even stopped me at the entrance gate by security guard thus compelling me not to attend the college for avoiding any kind of incident, further the Director of Colleges was informed by me in written form in addition to this I wrote an application to the Director Colleges for adjustment in other colleges

The letter No 90841 dated 02-04-2018 was received by me on 09 April 2018 at GMC (Govt college Nowshera) via the phone of principal for receiving the letter of D.H.E. Leattended regularly the college Govt College Khan Kohi Nizampur and then the principal relieved me on 11-05-2018 (AN) through this letter. copy attached)

#### **CHARGE NO 2**

The charge no.2 is not applicable to me in the light of the above facts and letter as I have never committed any act or omission under the rules being an obedient govt servant.

I have informed by the Directorate of Colleges before a week to attend the enquiry committee on 16-08-2018 and I attended the inquiry committee at establishment department civil sectt Peshawar at 11 AM and received the copy of charge sheet by hand. The director of Higher Education did not sent the copy of charge sheet at college address Govt Degree College Dggar Buner. The section officer of the concerned department directed me to attend the inquiry committee on 28-08-2018 at 11 AM and also submit your written reply to this office.

(h)

In my defence the Director Higher Education issued the letter to me for properly relieving from the college. The secretary Higher Education has released my salary vide wef 01-12-2017 to 30-04-2018 vide letter no SO(C-I) HE/1-2/2016/Abid Hussain dated 19-04-2018 order no 2866 dated 23-04-2018 has been issued to the District Account Office Nowshera for his salary and set-aside the letter no. 2869 dated 01-07-2017 (Relieved in Absentia).

It is therefore requested that the subject charge sheet and the allegations therein may kindly be dropped and the undersigned may be exonerated from the charges leveled against him.

Note: All the relevant documents are attached.

Abid Hussain

Associate Professor (Statistics)
Government Degree College
Daggar Buner

Mob # 0336-9482101



## DIRECTORAGE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA,

#### KHYBER ROAD PESHAWAR

Prom: # 091-3210242, 9211025/fax # 9210215

/ CA-1/ Estt: Branch/ A-12/General Transfer & Complaint

Dated Peshawar the // /2018

 $T_i$ 

The Principal

Covi; Post Graduare Palego, Novebera.

SUBJECT Memo:

#### APPLICATION FOR RELEASE OF SALARY.

I am directed to refer to the application dated 15.02.2018 in season of Mr. Abid Hussain, Associate Professor of Statistics. Governously, Districtive College, Khan Kohi (Nowshera) requesting therein for release of schary and to state that the Director, Higher Education, Khyber Pakhtunkhwa has regretted his request and directed to ask the officer concerned to get himself properly relieved intracdimety as he is under transfer to Governous Degree College, I regard (Guzer) otherwise street disciplinary action will be initiated against him.

tam further directed to state that being JMC Coordinator, other concerned officers of Govt; Degree College, Khan Kohi (Nowshera), who have been transferred to other College, may be relieved of their duties at the certiest under intimation to this office, otherwise disciplinary action will initiated against the defaulting officers.

TY: DIRECTOR (ESTABLISHED)



#### GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

NO.SO(C-I)HE/1-2/2016/Abid Hussain Dated Peshawar the 19/04/2018

To

The Director,

Higher Education Khyber Pakhtunkhwa!

Peshawar

Subject:

RELEASE OF SALARY OF MR. ABID HUSSAIN, ASSOCIATE PROFESSOR (BPS-19) W.E.F 01.12.2017 TILL DATE, GDC KHAN KOHI (NIZAMPUR).

I am directed to refer to the subject noted above and to state that salary of Mr. Abid Hussain, Associate Professor (BPS-19) of Statistics, Government Degree College Khan Kohi (Nizampur) may be released w.e.f 01.12.2017 and he may be relieved immediately so that he complies with the orders of Provincial Government of posting/transfer.

(RIAZ) SECTION OFFICER (*C-I*)

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Page 830

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### RELIEVING CHIT

In compliance with notification No.SO(E-I)E&AD/9-88/2017 dated. 13-06-2017 Mr. Syed Abid Hussain Associate Professor (BPS-19) is hereby relieved from his duties on dated. 11-05-2018 (AN) and nothing outstanding against him.

Principal CIPAL

GREKHan KSIN NEEMpur

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The inquiry officer/ inquiry committee,

- 1. Mr. Zafar Iqbal (PCS EG.BS-21)
- 2. Prof. Dr. Abdur Rashad Principal GDC Wadpaga.

#### Subject:

#### REPLY TO THE CHARGE SHEET/DEFENSE

#### Respectfully submitted

- 1. That the undersigned has been initially appointed as lecturer on 28-10-2005.
- 2. That during the course of service the undersigned remained at different stations and ever since appointment performed his duties with zeal and devotion and without any complaint whatsoever with regard to his duties.
- 3. That undersigned has been posted at Govt. Degree College Khan KhoiNizampur on 01-10-2015.

#### Respected/sir,

With due respect it is submitted in written that:

i. I was transferred from GDC Khan Kohi, Nizampur (Nowshera) vide Notification No.SO (C-II)HED/2-5/2017/2870-2957 dated 07/02/2017 and my services are placed at the disposal of FATA directorate. The Principal relieved me in absentia and did not provide the relevant documents (Relieving slip and clearance certificate) intentionally therefore I submitted an appeal before the court of Senior Civil Judge Nowshera on 10/02/2017 and the temporary injunction was granted me by the august court against my transfer to FATA. (Copy of the appeal/temporary injunction is attached here).

I continued my duty at GDC Khan Kohi during the temporary injunction. After regular hearing the honorable court referred my case to the Khyber Pakhtunkhwa Service Tribunal Peshawar. Then I submitted a fresh appeal before the Khyber Pakhtunkhwa Service Tribunal Peshawar which was admitted for hearing and the court directed that meanwhile status quo be maintained. Appeal No-512/2017 dated 24/05/2017. (Copy attached)

When the case prolonged then I submitted another application before the court on 1/9/2018 for early hearing but the court still adjourned the case to next date. (Copy of the application attached). When the new principal Prof. Dr. Nisar took over the charge then I got relieved me properly and compliance the order in the best

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interest of department and students. (Copies of the Relieving chit, clearance certificate and certificate of transfer of charge are attached here)

It is stated that I have not turned a deaf ear to this order rather I approached the court to get relief which is my legal right. Hence the allegation at S.No-i in charge sheet may be dropped please.

ii. Though the principal GDC Khan Kohi was conveyed the court directive but in spite of that he relieved me in absentia vide office order No-2716 Dated 09/02/2017.

The principal GDC Khan Kohi was personal with me on many grounds. As I have already approached the court of senior Civil Judge Nowshera against the transfer order I therefore did not leave GDC Khan Kohi.

Therefore the allegation at S.No-ii may also be dropped please.

Further I desire to be heard in person.

Regards

Yours sincerely,

Ikramullah Lecturer in Pashto GDC Khan Kohi Nowshera

I Z UN 013 611 203 C Mian Ikran Ullah S/o Muhammad Gul R/o Mohallah Tauheed Abad, Shero Jhangi, Charsadda Road, Tehsil & District Peshawar, presently Govt. Degree College Khan Kohi, Nowshera. (Plaintiff Versus 1 Secretary Higher Education, Peshawar 2- Director Higher Education Peshawar. 3. Principal Govt. Degree College Khan Kohi, Nowsher (Defendants) Application for grant of temporary injunction with the prayer that the respondents may kindly be restrained to transfer the plaintiff from Govt. Degree College Khan Kohi, Nizampur to FATA Secretariat. Respectfully Sheweth:-It is submitted as under:-1- That the instant suit is pending before this Honorable Court in which no date of hearing is fixed for yet. 2- That prima facie the captioned case would be decided in favor of plaintiff. 3- That balance of convenience is also lies in favor of plaintiff. 4- That if temporary injunction is not granted in favor of plaintiff against the defendants, the plaintiff will suffer from irreparable loss as the students of the institution would excluded and deprived from his Lecturer/Teacher. It is therefore most humbly prayed that temporary injunction may please be granted in favor of plaintiff against the defendants. Dated :- 18th Feb. 2017. Hafi- Varyah Ali Khan The plaintiff Actocate High Court District Courts Nowshera Through Counsel Hafiz Nawab Ali khan Advocate High Court, District Courts Nowshera. Verification: I, the plaintiff do hereby solemnly affirm and declare on oath that the entire contents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court. Deponent

scench District

02 Mek 2017

### BEFORE THE COURT OF SENIOR CIVIL JUDGE NOWSHERA



Mian Ikram Ullah S/o Muhammad Gul R/o Mohallah Tauheed Abad, Shero Jhangi, Charsadda Road, Tehsil & District Peshawar, presently Govt. Degree College Khan Kohi, Nowshera.

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#### Versus

- 1- Secretary Higher Education, Peshawar
- 2- Director Higher Education Peshawar.
- 3- Principal Govt. Degree College Khan Kohi, Nowshera.



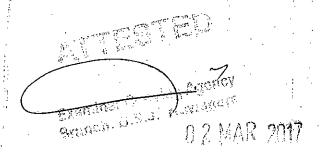
- A-Suit for Declaration that the plaintiff serve on the post of Lecturer for about one year and two months in Govt. Degree College Khan Kohi. Nizampur District Nowshera and now by the connivance of defendant No. 3 with malafide intention the plaintiff posted to FATA Secretariat which is against the rules of business and not effective upon the rights of the plaintiff.
- B- <u>Suit for temporary injunction</u> for restraining the defendants from illegal transferring / action.

Valuation for the purpose of court fee and jurisdiction is Rs. 500+500/-Cause of action accrued to the plaintiff after posting the plaintiff from Govt. Degree College Khan Kohi to FATA Secretariat.

Respectfully Sheweth:-

#### It is submitted as under:-

- 1- That plaintiff is currently posted /stationed at Govt. Degree College Khan Kohi, Nizampur Tehsil & District Nowshera as Lecturer in BPS-17.
- 2- That the plaintiff served and remained as lecturer only for about one year and two months.
- 3- That the defendant No. 3 filed a petition under 22-A Cr.P.C for lodging of FIR against the plaintiff which was turn down by the learned Additional Session Judge-II Nowshera on 11-02-2017. (Copy of order is attached).



- 4- That legally and as per rules the defendant No. 3 having no power to recommend transfer of the plaintiff after about one year and two months as this is against the prescribed rules of business.
- 5- That various complaints are pending against the defendant No. 3 and one of them is attached which is pending before the Prime Minister's Public Affairs and grievances Wing, Ministry of Parliamentary Affairs Islamabad
- 6- That value for the purpose of court fee and jurisdiction is mentioned in the heading of the plaint.
- 7- That cause of action accrued to the plaintiff after the issuance of transfer order dated 09-02-2017. (Copy attached).
- 8- That this Hon'ble court has got the jurisdiction to entertain the matter in hand.

It is therefore most humbly prayed that on acceptance of this plaint, the decree in favour of plaintiff against the defendants may kindly be awarded with costs.

Dated :- 18th Feb. 2017.

The plaintiff\_\_\_\_\_

Through Counsel

Hafiz Nawab Ali khan

Advocate High Court,

District Courts Nowshera.

<u>Verification:</u>- It is verified that the entire contents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon ble. Court.

Deponent

102 MAR 2017

# FORM OF ORDER SHEET. IN THE COURT OF SENIOR CIVIL JUDGE NOWSHERA.

Title of case\_

S. No of order	15.	
of proceedings	Date of order of Proceedings	Order of other proceedings with signature of judge or magistrate that of parties or counsel where necessary.
   Or01	10/0/11	
	10/2/17	Instant Civil Suit submitted by the plaintiff(s) through
		counsel. Same is entrusted to the Court of
		or the court of
	-	Mrs./Mr. Ballht 2ada the learned
		Saloway, rod disposati Counsel
. [		for the plaintiff(s) is directed to appear before the said Court today
	:	$1 \leq 1 \leq 1 \leq 2 \leq 3 \leq 3$
	, ,	The Market of the Control of the Con
		(Nusrat Naz)
		Senior Civil Judge, Nowshera.
		Nowshera.
<u>Or</u>	02	
18.02.20		ase file received from the court of learned SCJ, Nowshera.
	Plainti	f through counsel present and admits the contents of
	plaint	as correct. It be registered. Defendants be summoned
	throug	h process of the court for the date fixed. Alongwith plaint
	· 1,	plication for grant of temporary injunction is annexed.
	ì	
	Hence,	
-	defend	ants/respondents for date fixed. Plaintiff is directed to
	submit	registered A.D within three days for summoning the
	defend	ants/respondents No. 1 & 2. File to come up for attendance
	or <b>uci</b> c	ndants/respondents on 25-02-17
		, Bakht Zada Khan, Civil Judge-VI,
		Nowshera.
	material in the first first	MAN - DO IN THE MANN
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FORM OF ORDER SHEET of Volyber Pakhfor

512/2017

Status - quo orde

School School

Resch Case No S.No. Order or other proceedings with signature of judge or Magistrate Date of order proceedings 1 CT. 24/05/2017 The appeal of Mr. Ikramullah presented today by Mr. 1 Yasır Saleem Advocate, may be entered in the Institution Register and put up to the Worthy Chairman fo proper order please. 写事情感的 (1) 1000 A factor ( ) or ( ) in-This case is entrusted to S. Bench for prelir inary hearing to be put up there on 8-6-20/7. Mari Horing. 08.06.2017 Clerk to counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 10.07.2017 before S.B. (A unad Hassan) Member ATTESTED Peshawar

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Televiar Paking hwa

Appeal No. 512 /2017

Ikram ullah, Lecturer BPS-17, Government Degree College Khan Kohi NIzam Pur District Nowshera.

(Appellant)

#### VERSUS

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

(Respondents)

Appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the Order dated 07.02.2017, whereby the Appellant has been transferred from Government Degree College Khan Kohi Nizam Pur District Nowshera and his services has been placed at the disposal of FATA Secretariat, against which the Departmental Appeal dated 09.02.2017, has also not been responded despite the lapse of 90 days statutory period.

Prayer in Appeal;

24/5/12

ATTESTED

Knyber Hakharikhwa

Service Turbunal,

Peshawar

On acceptance of this appeal the transfer Order dated 07.02.2017, may please be set-aside being passed in the violation of posting/transfer instruction, and premature and the Appellant be allowed to continue his duties as Government Degree College Khan Kohi NIzam Pur District Nowshera. Any other remedy which this august tribunal deems fit and appropriate that may also be awarded in favour of Appellant.

Affeat No. 572/2017 IKramullah Vs. Got Tribunia A Joganya

20.06.2017

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving as lecturer in Government Degree College Khan Kohi Nizam Pur District Nowshera but the competent authority has transferred him vide order dated 07.02.2017 and has placed his services at the disposal of FATA Secretariat. It was further contended that before placing the services of the appellant at the disposal of FATA Secretariat, the approval of the Governor was necessary but the same approval was not obtained before the impugned order, therefore, the impugned order being premature, is illegal and liable to be set-aside. The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days. Notices be issued to the respondents for written reply/comments for 03.08.2017 before S.B. Notice of application for suspension of the operation of the impugned order dated 07.02.2017 be also issued to the respondents for the date already fixed. In the meanwhile status-quo be maintained till date.

Certificate Betwee copy

M. Amin Khan Kundi

Scruce National State of Copy and Date of Complettion of Copy and Date of Delivery of Copy

03.08.2017

Counsel for the appellant present. Mr. Irfanullah, AD alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents No. 1 to 3 and respondent No. 4 Mr. Sher Bahadar, Principal with his counsel also present. Written reply on behalf of respondent No. 4 submitted. Representative of respondents No. 1 to 3 requested for adjournment. Adjourned. To come up for written reply/comments on behalf of respondents No. to 3 on 17.08.2017 before S.B. In the meanwhile status-quo be maintained till the date fixed.

Member

17.08.2017

Clerk to counsel for the appellant, Asst: AG alongwith Murad Khan, Supdt and respondent no.4 with counsel present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 28.08,2017 before S.B. Status-quo be maintained till the dat fixed.

( \hmad Hassan) Member

28.08.2017

Counsel for the appellant present. Mr. Murad Alla Superintendent alongwith Mr. Muhammad Adec Butt, Additional AG for respondents No. 1 to 3 and responder: No. 4 with his counsel also present. Written reply on behalf of aspondent No. 4 has already submitted. Written reply on behalt of respondents No. 1 to 3 not submitted. Learned Additional A 5 requested for. further adjournment. Adjourned. To come up for written reply/comments on 12.09.2017 before S.B. Status-quo be maintained till the date fixed.

> (Muhammad Amin han Kundi) Memb r

ATTESTE

Service Trounal

Peshawar

12.09.2017

Mr. Murad Ali, Superintendent alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents No. 1 to 3 and counsel for respondent No. 4 present. Written reply on behalf of respondents No. 1 to 3 not submitted. Requested for further adjournment. Representative of the department is directed to furnish authority letter on or before the next date. Adjourned. To come up for written reply/comments on 27.09.2017 before S.B.

(Muhammad Hamid Mughal)

Member

27.09.2017

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional AG alongwith Murad Ali, Superintendent and Sher Bahadar, Principal for the respondents also present. Written reply on behalf of respondent 110. 4 has already submitted. Written reply on behalf of respondents No. 1 to 3 not submitted. Learned Additional AG requested for further adjournment. Adjourned. To come up for written reply/comments on behalf of respondents No. 1 to 3 on 26.10.2017 before S.B. Status-quo be main tained till the date fixed.

(Muhammad / min Khan Kundi) Member

ATTESTED

yberice Sunal, Service Sunal, 26.10.2017

Clerk of the counsel for appellant present. Mr. Kabirullah Khattak, Additional AG along vith Muhammad Irfan, AD for respondents No. 1 to 3 and counsel for respondent No. 4 also present. Written reply on behalf of respondents No. 1 to 3 submitted. Written eply on behalf of respondent No. 4 has already submitted. Adjourned. To come up for rejoinder and arguments on 13.11.2017 before D.B. Status-quo be maintained till the date fixed.

(Muhammad A nin Khan Kundi) Mi mber

13.11.2017

Counsel for the appellant and Mr. k abeerullah Khattak, Addl. AG for the respondents present. he learned counsel for the appellant requested for adjournment to prepare rejoinder. Granted. To come up for rejoinder and arguments on 30.11.2017 before the D.B. Sta us quo be maintained till the date fixed.

Member

Chair man

30.11.2017

Counsel for the appellant and Mr. Muhammad Jan, DDA for respondents present. Counsel for the appellant seeks adjournment. Adjourned. Last chance is given to the appellant for arguments. To come up for arguments on 07 12.2017 before D.B.

Member

Chairma 1

Clerk of the counsel for appellant pussent. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Murad Ali, Superintendent for the respondents also present. counsel for appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 13.12.2017 before D.B.

(Ahmad Hassan) Member (E)

(Muhammad Amin Khan Kundi) Member (J)

13.12.2017

Learned counsel for the appellant present. Learned AAG for the respondents present, learned counsel for the respondent No. 4 also present. Learned counsel for the appellant submitted. rejoinder which is placed on file, copy of which handed over to the learned AAG. Learned counsel for the respondent No.4 requested for adjournment. Adjourned. To come up for arguments 02.01.2018 before D.B

(Gul Zet Khan) MEMBER:

(Muhammad Hamid Mughal) MEMBER

02.01.2018

Clerk of the counsel for appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents also present. Clerk of the counsel for appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 25.0 .. 2018 before D.B.

(Ahmad Hassan) Member(E)

(M.Amii /Khan Kundi) Member (J)

ATTESTED Service Victorial,

Peshawar

Counsel for the appellant present. Mr. Riaz Phindakhel, Assistant AG alongwith Mr. Murad Khan, Superintendent for the respondents present. None present on behalf of private respondents No. 40 Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 16.03.2018 before D.B.

16.03.2018  $ag{48.7}$   $ag{48.7}$  Appellant with counsel, Mr. Muhammad Jan, Deputy District Attorney for respondents No. 1 to 4 and counsel for respondent No. 5 present. Learned counsel for respondent io VIII No. 5 seeks adjournment. Adjourned. To come up for arguments on 02.04.2018 before D.B.

> (Muhammad Amin Khan Kundi) Member

(Muhaminad Hamid Mughal) Member

G2.04.2018

Clerk to counsel for the appellant and 1/1r. Muhammad dan, Learned Deputy District Attorney for the respondents present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 25.05.2018 before

(Ahmad Hassan) Member

·(Muhammad Hami: I Mughal) Member



Before The Ichylory parketuridena service Tribunal perhange IKOUM Lillah versus - Grovt of Icple Application In Early horning Respect July Shewili: 1) That the above pending source Appeal No 512/017 à perding before Mis hoursable Service Tribuned which is fixed for 2 3018 2) That the pettiener woulded to 9 7018 more requested for early hearing To grath forder da da los lis chave appeal

you the gard da los lis chave appeal At a therefore mod hubor proposed MAMIN That the application many leindry 1/9/20/8 be accepted parer Rocale Klan



# DIRECTOR E OF HIGHER EDUCATION KHYBER PAKHTUNKHWA, KHYBER ROAD PESHAWAR

Prom. # 091-3210242, 9211025/Gaz # 9210215

/ Ch-t/ Est: Branch/ A-2/General Transfer & Complain

Dazed Peshawar the 1/1/2018

30

The Principal

Covi, Fost Graduate i Jego Novelicia

SUBJECT Memo:

#### APPLICATION FOR RELEASE OF SALARY

I am directed to rejur to the application dated 15.02.2018 in 130 of the Abid Hussain, Associate Professor of Statish in Total Degree Whan Robi (Nowshera) requesting therein for release of subserv and to trace that the Director, Higher Education, Khyber Fakhtunkhwa has regretted this request and directed to ask the officer concerned to get himself properly three incrediately as he is under transfer to Gove, Degree College, It against otherwise strip disciplinary action will be initiated against him?

dam Aurther directed to grate that being JMC Coordinator; other concerned officers of Govt; Degree College, Khan Kohi (Nowshere) who have been transferred to other College may be released or their college at the conficer under intimation to this officer otherwise disciplinary action wall editions against the defaulting officers.

IN DIPLOTOR ESTABLISHMENT

and worded

Man Coll

## OFFICE OF THE PRINCIPAL GOVT: DEGREE COLLEGE KHAN KOHI(NSR) CERTIFICATE OF TRANSFER OF CHARGE

Certified that we have on the fore/afternoon of this 1. Day 07.09.2018(F/N) respectively made over and received

Charge of this office of Principal, GDC Khan Kohi (NSR) vide Notification No. SO (Colleges-II) HED/2-5/2017/2870-2957 Dated 07/02/2017.

Particulars of cash and important confidential Documents handed over are noted on the reverse.

Station.Govt..Degree, College Khan Kohi Nizampur (Nowshera)

Signature of Relieved:... Government Servant: Mr. Ikram Ullah Designation: Lecturer in Pashto

Signature of Relieving:.. Government Servant: Mr. Fida Hussain Designation: Lecturer in Physics

Station: Govt: Degree College Khan Kohi Nizampur(NSR)

Endst: No 262 - 266 Dated 07-09-2018

#### Forwarded to the:

01. The Director of Education, FATA.

- The Director of Higher Education, KPK. Peshawar for 02. Information please.
- JMC/Principal GPGC, Nowshera. 03.
- District Accounts Officer Nowshera. For information please. 04.
- 05. Official Concerned
- 06. Personal/File.

Principal Govt: Degree College Khan Kohi(NSR).

Principal Govt, Degree College Khan Kohi (Nizampur Nowshera) .



Ref. Ho.

# To whom it may Concern

It is certified that the following children of Mr. Ikram ullah is getting education from this institute since last 04 year. The students are residing nearby the school in Khanpur Township.

S.No	Adm No	Name	Class
1.	8629	Shazia Bibi	9th
2	7011	Sidra Bibi	7 <sup>th</sup> .
3	4369	Habiba Ikram	4 <sup>th</sup>
4	4533	Aýesha Ikram	2 <sup>nd</sup>

Dated: 20-02-2017

Principal
Princi

Lating in the Prince of Knampur Destriction for the Property of the Control of th

I Mr. Imran Assistant Director Directorate of Higher Education being the Departmental representative submit that the accused officers were transferred on the administrative grounds so as to maintain congenial environment in the college, however, they refused to comply with the orders of the Department. Therefore, request was made for proceedings against them under the E&D rules, 2011

> Assistant Director Directorate of Higher Education

relevant Record to the extent the three officers have been provided to the inquery Com i, Directions of HEARD of reshupping of stapp (Exhibit) Ben his transfer not p'Cation. (Exhibit/2)

V) Direction's to the principal of Compliance - (Exhit-3) vi, Explorations/Directions. (Fachent So 6)

ni, Orde Sheet dated 19.12.17 (Echibit/3)

vii, Letter of MEALD - (Fashit/7) viii, Letter to Hears regarding orde-sheet (Feelight-8)



# **NIZAMPUR NOWSHERA**

I Sher Bahader Khan submit that upon my transfer, I immediately submitted my arrival report to FATA Secretariat on 20-11-2017, however, due to some technical lacunas in the notification, I submitted an appeal to Session Judge Nowshera for transfer cancellation. I also submitted a humble cancellation request to Chief Secretary of KPK Peshawar. Meanwhile the Session Judge Nowshera granted a stay order. The Chief Secretary KPK Peshawar did not accept my appeal, therefore, I withdrawn my appeal from The Court Of Session Judge Nowshera.

The Director of Higher Education KPK Peshawar ordered me to purchase the furniture, science equipment etc. for GGDC Khan Kohi Nizampur Nowshera. I fulfill this assignment successfully and the purchased items were stored in GDC Khan Kohi. At the same the DHE again asked me to operationalize the newly established GGDC Khan Kohi. I requested to DHE for the handover the items of GGDC Khan Kohi. The DHE nominated a Committee for taking over and handover. In this process the DHE telephonic direct me to handover the charge of GDC Khan Kohi. Therefore without any delay I handover the charge on dated 18-04-2018 and reported at FATA Secretariat.

Prof. Sher Bahader Khan

Ex. Principal

Govt. Degree College Khan Kohi

Nizampur Nowshera.

# STATEMENT OF MR. ABID HUSSAIN ASSOCIATE PROFESSOR OF STATISTICS GDC DAGGAR BUNER

I Abid Hussain Associate Professor of Statistics BS-19 solemnly declared that I was not informed about my transfer by the college administration as college was closed due to ongoing summer vacation form 1<sup>st</sup> June, 2017 to 15<sup>th</sup> August, 2017. The Principal did not inform me about the process of proper relieving and he relieved me in absentia without any intimation by any means via JMC or Director Higher Education. Furthermore an application was submitted in the office of the Secretary Higher Education Department against stoppage of my salary by the College Principal by relieving the undersigned in absentia

The application was entertained on 19-4-2018 and the Directorate of Higher Education was directed to release the salary of the undersigned w.e.f 1-12-17 and subsequently relieve from the post of Associate Professor at GDC Khan Khoi.

Owing to the direction communicated vide above quoted letter the undersigned assumed charge at GDC Buner on 12-5-2018.

Associate Professor of Statistics
Govt. Degree College Daggar Burer

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## Statement of Mr. Ikramullah Lecturer in Pashto

I Mr. Ikramullah lecturer in Pashto was transferred from GDC Khan Kohi, nowshera on 07/02/2617 and my services are placed at the disposal of FATA directorate. Due to non completion of tenure at the same station. I submitted an application before the court of Senior civil Judge district Nowshera on 10/02/2017. The honorable court granted temporary injunction me against the impugned order. After regular hearing the court decided to approach the proper forum. After completing the appealing period submitted an appeal in the Khyber Pakhtunkhwa Service Tribunal Peshawar which was admitted for regular hearing and meanwhile the court directed that status quo be maintained and the appellant will perform his duty at GDC Khan Kohi, Nowshera. Appeal No.512/2017 dated: 24/05/2017. When the case is prolonged in the court then I submitted another application on 01/09/2018 in the court for early judgment but the court still adjourned the case to 27/09/2017. Lastly I compliance the order in the best public interest and I was relieved properly by the directive of DHE, KPK.

## Other Facts

- 1- Estayed at GDC Khan kohi only one year and four months.
- 2- Thelong to district Bajaur and have a serious threat from the militants.
- 3- I am residing at New Khanpur Township, district Haripur and my children are registered with the BISE Abbottabad.

Dated: 25/09/2018

Ikramullah

Lecturer in Pashto

Higher Education Department Khyber Pakhtunkhwa Peshawar

A molasson de limites and codeller

my for the

The Secretary, Higher Education Peshawar KPK.

Subject:-

Reminder about the Cancellation order No. So (E-I) E & AD/9-

88/2017.at S.No. 22.

Respected Sir,

It is submitted for your kind information that the application on the subject cited above has been sent to your good office on 20-06-2017 for cancellation of my transfer under the jurisdiction of appeal but the response about the said application is still awaited. As, I belong to the settle area & as per rules of the government policy the transfer order may please be enhanced and consider in the light of submitted application on 04-02-2015 which was duly signed by the principal concern.

I am the head of family members in regard to pick and drops my children at school and their look after,

It is therefore, requested that the transfer order may please be cancelled and it may be considered according to the posting proforma attached.

Dated: 30-06-2017

Your's Sincerely,

Associate Professor Statistics

Govt. Degree College

Khan Koi Nizampure (Nowshera)

The Secretary Jebnin Vepre Subject: O Application about the concellation to oder SO(E-1) EPMO | 9-58/2017 at 5.No.22 About the adjusted applications duly rigad by the Treasfer & gress under Danished right with the preference of subjection Minhor at 07+E It is Thetal Kier I have Buton Plan, Thee applications on 20/6/17 then Substill rounding appliation on 13/6/19 DS AMERICA application on 1917/17. but still now me is waiting for the nothing wall with single male the happelly. I am the single male things of the picks and christs of school children from city school of the school o Heelin about & home & vice Mersa (vorse I region your good honor thurth Cancel or adjust my postures with the reference of substituted applications of the special food Abade application of the special of

(42)

# MUHAMMAD IDREES KHATTAK

Member Provincial Assembly
PK-15 Nowshera

Ref No.\_\_\_\_

Date: 18/1/21/1-

My Dear Mushtag Gham St.

Minister for Higher Edu. KPK

AOA.

I hope you will be in beller condition.

It is Stomply requested that Mr. Abtol Hussom Associate port

9. Stats of GDC Khan Kohi Nizampur (NSR) is very close to we the lings

to Doth Newshera. I am Stomply intrested to him & recommended to

Concellation of his transfer from GDC Khan Kohi Nizampur to

Dagar Buner as per rules poloice; of the posting is placed air

Domicile basis.

More over, Abid Hussain Associante Dorf (P.PS-19) G. D.C. Whan Kihi many please be adjusted as principal of the Said College against the Valant Post.

9 Shau be very thanked fall for this act is fair a

Sur CHES proposalo.

Advisor to Chief Minister for Higher Education & Information & Public Relations Departments Khyber Pakhtunkhwa Jours knother

1721-973118

(u?)



# DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA,

# KHYBER ROAD PESHAWAR

# 1991-3210242, 9211025/Eax # 9210215

/ Ch-I/ Est: Branch/ A-x2/General Transfer & Complaint

Dated Peshawar the 12 / 1018

3,1

The Principal

Covi; Fost Graduate Indegs, Novembera.

SUBJECT Memo:

# APPLICATION FOR RELEASE OF SALARY.

I am directed to relat to the application dated 15.02.2013 in 1800 of let shid Hussain, Associate Professor of Statistics, let at Delate of the Robi (Nowshera) requesting therein for release of smary and to state that the Director, Higher Education, Khyber Fakhtunkhwa has regretted his request and directed to ask the officer concerned to get himself properly three linear linear linear linear as he is under transfer to Gove, Degree College, I again the property otherwise strict disciplinary action will be initiated against him.

other concerned officers of Govt; Degree College, Khan Kohi (Nowshers) who have been transferred to other College, may be relieved of their cuties at the earligst under intimation to this office, otherwise disciplinary action will be initiated against the defaulting officers.

The management constraints the design

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Carrow Mand M

2. Trys



# OFFICE OF THE PRINCIPAL GOVT. POST GRADUATE COLLEGE LANDI KOTAL KHYBER

No: 4394

dated:-27-08-2018

To

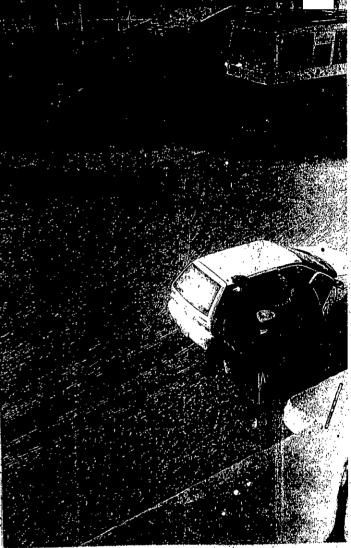
- 1. Mr. Zafar Iqbal PCS EG BS-21 OSD E&AD
- 2. Prof. Abdur Rashad
- Principal
   Govt. Degree College Wadpaga
   Peshawar.
   Subject:- DISCIPLINARY PROCEEDING
   CREATING DISTURBING ENVIRONM
   COLLEGE, KHAN KOHI (NOWSHERA)

As I have been transferred to FATA Secreta E&Ad/9-88 dated 14-11-2017, therefore I sub Higher Education FATA Peshawar on dated 20

I submitted a request/appeal to honorable Chic No. 8518WIE dated 20-11-2017. (Photo copy a

My transfer from settle to FATA was not accurules, because the approval from honorable (Photo copy attached)

I submitted an application for transfer cance Judge – VII Nowshera. He granted stay order attached). Therefore I submitted another appli FATA Peshawar for not taking action because c



Meanwhile my appeal was not accepted therefore I withdrew my application from district court Nowshera. (Photo copy attached)DHE issued a letter for purchasing



cience equipment, Hiace, furniture, plant and machinery for Govt. Girls Degree College Khan Kohi Nizampur Nowshera. (Photo Copy attached). I completed purchase according to all coddle formalities.

He also ordered me for first year admission in Girls College without any faculty member in Girls College and I started in same position. (Photo copy attached)

When I drew my appeal from the district court then I requested to handover all those items which are still stock in GDC Khan Kohi. But neither the New Principal of this college nor the acting DDO of the girls' college ready to take over the charge.

DHE constitute a committee for handover the items. During the process, the DHE telephonically called me to release the charge immediately without handover those items of GGDC Khan Kohi. Therefore I relieved myself without any delay on dated 18-04-2018. (Photo copy attached).

The committee again took over the items of GGDC Kahn Kohi on dated 13-18-2018 where some deficiency in the stock was found. (Photo copy attached)

# Moreover due to my personal interest and efforts

- 1. I joined this college as principal on dated 01-06-2013. The enrolment of students for the session 2012-13 was just 97. Now for the session 2017-18 is 563 approximately.
- 2. The transformer was stolen in 2012. Electricity was not there. I requested one of my relative for installation of transformer and he provided from his pocket money.
- 3. The college was established in 2003. No grant in ADP was granted until 2013. Boundary wall was constructed around 120 kanals area from a grant of 2.00 million in head of minor repair. Books of 0.5 million, computers of 0.8 million, solar system of 0.8 million and 0.4 million furniture were purchased.
- 4. Tube well was out of order. Four poles of electricity and three phase meter was installed for smooth running of water supply for plants as well for drinking.



- 5. Approximately 5000 plants of different fruit and other ever green plants were planted.
- 6. In my tenure examination hall was constructed.
- 7. A huge amount of scholarship from zakat fund was granted to students.
- 8. A number of students have been taken admission in Peshawar University. In history of this college only one student was admitted to Software engineering in NAMAL University Islamabad during my tenure.

Principa

Govt. Post Graduate College Landi Kotal Khyber.

Ex. Principal

Govt. Degree College khan Kohi

Nizampur Nowshera.



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



Print Report

Employee Attendance Report (Indiviual) (Friday, January 2)

Summary:

6. Scale:

1. Name: Sher Bahader Khan

BPS-20

2. CNIC: 1730113673879

3. Gender: Male 4. FP.ID : 14225 5. Designation: Principal

7. Department: GDC Khan Kohi Nizampur, Nowshera.

8. Shift: In Time: Out Time: Grace Tim

8. Shift:	"In Time: "Out Time: "Gr	ana Tim			
S.No Attend	ence Date Day			4	
1 01/01/2018	. Duy	In Time	Out Time	a	C4
2 01/02/2018		8:22 AM	МТО	Present	Status
3 01/03/2018	rucsday	7:44 AM	MTO		
1-70072010	WCUIESUAV	8:10 AM	MTO	Present	
0110112010	THUISHAV	8:00 AM		Present	
5 01/05/2018	1 IIUav	11:45 AM	2:00 PM	MA (MA.	-Admn. Duty)
6 01/06/2018	Saturday	2:59 PM	3:12 PM	Present	
7 01/07/2018	Sunday	2.39 PM	7:51 AM	Present	
8 01/08/2018	Monday	<del>-</del>		Absent	A Part of the second
9 01/09/2018		10:34 AM	2:41 PM	Present	
10 01/10/2018	Tuesday	7:59 AM	4:35 PM	Present	
11 01/11/2018	Wednesday	7:37 AM	3:02 PM	Present	
12 01/12/2018	Thursday	7:52 AM	3:52 PM	Present	ř
13 01/13/2018	Titay	8:37 AM	8:01 PM	Present	
	Durary	7:47 AM	МТО		
	Sunday	==		Present	
15 01/15/2018	Monday	10:36 AM	2.00 43.4	Absent	
16 01/16/2018	Tuesday	7:41 AM	2:08 AM	Present	
17 01/17/2018	Wednesday		4:02 PM	Present	
18 01/18/2018	Thursday	7:46 AM	2:59 PM	Present	
19 01/19/2018	_		·	On-Leave	1.93
20 01/20/2018	Friday	9:40 AM	1:37 PM	Present	
21 01/21/2018	Saturday	7:32 AM	· · · · · · · · · · · · · · · · ·	Present	
22 01/22/2018	Sunday	·	•	Absent	
23 01/23/2018	Monday	8:12 AM	A 40	Present	
	Tuesday	7:40 AM	<b>A</b>	Present	
24 01/24/2018	Wednesday				
1 .				Present	*



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



Employee Attendance Report (Indiviual) (Friday, January 26)

Summary:

I. Name: Sher Bahader Khan 2. CNIC: 1730113673879

3. Gender: Male 4. FP.ID : 14225 5. Designation: Principal 6. Scale:

BPS-20 7. Department: GDC Khan Kohi Nizampur, Nowshera

,In Time: ,Out Time: ,Grace Time:

S.No Attendence D	o. ,Out Time: ,C	race Time		. !	, ,
Attendence I	ate Day				•
1 11/01/2017	Day	70. 11		ime	
2 11/02/2017	Wednesda	4.44	M 8:26 PM		Status
3 11/03/2017	Thursday	7:59 AN	4 2:03 PM		
4 11/04/2017	Friday	7:45 AN	1 12:13 PM		•
5 : 11/05/2017	Saturday	7:37 AN	1 11:10 AM	03011	•
6 11/06/2017	Sunday				i
7 11/07/2017	Monday	9:11 AM	3:22 PM	Absent	***
8 11/08/2017	Tuesday	7:29 AM		Present	:
9 11/09/2017	Wednesday	7:50 AM		Present	
10 11/10/2017	Thursday	8:40 AM		Present	* .
- 11 - 11/11/2017	Friday	7:13 AM	1:29 PM	Present	: :
12 11/12/2017	Saturday	8:02 AM	12:33 PM	Present	
13 11/13/2017	Sunday	·	12.55 FIVI	Present	•
14 11/14/2017	Monday	8:52 AM	1:55 PM	Absent	
15 11/15/2017	Tuesday	7:54 AM	·2:22 PM	Present	1 2
16 11/16/2017	Wednesday	8:27 AM	MŢO	Present	•
17 11/17/2017	Thursday	8:00 AM.		Present	
18 11/18/2017	Friday ,	7:41 AM	-2:00 PM	MA (MA-On	Ext. Duty)
19 11/19/2017	Saturday	7:17 AM	3:25 PM	Present	
11.12/2017	Sunday .	71141	11:43 AM	Present	٠,
120/201/	Monday			Absent	:
**/21/201/	Tuesday	₹:48 AM	2.00	On-Leave	:
	Wednesday	7:53 AM	2:22 PM	Present .	
	Thursday 😘	AIVI	2:37 PM	Present	19
	Friday	8:31 AM	1015	On-Leave	
	Saturday :		1:21 PM	Present	1.0
**************************************	Sunday	AIM TIM	2:00 PM	MA (MA-On E	xt. Dutv\
-1/2//2017	N/	8:54 AM		Absent	
28 11/28/2017	Tr	0.04	МТО	Present	,
, m	··· <b>·</b>	o.20 AM ]		Present	. i 7.
•	•		٠.		

.D. V. Retzi Anongentini Por. Implantation OR Court orde Plant/Antonio Ot is write honer, that well Metre P/Sis, my Sente har year pouled or Ligard of Plata Seluid, and Said normal has been huspicaled by Idams Cari — vide det enene de Infor necessary andra MedeThe Chief Secretary

Civil Secretariat,

Khyber Pukhtunkhwa, Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE NOTIFICATION NO. SOCE1) E&AD/9-88/2017, DATED, 14-11-2017 WHERE THE UNDERSIGNED
HAS BEEN TRANSFERRED FROM GOVT, DEGREE COLLEGE, KHAN
KOHI (NIZAMPUR) AND PLACED AT THE DISPOSAL OF FATA
SECRETARIAT.

Respected Sir,

It is stated that the undersigned was appointed as a lecturer (BS-17) in 1989 and ever since my appointment I remained posted at different stations i.e., Haripur, Peshawar, Mansehra, Lahor (Swabi), Khan Pur and presently serving as a Principal at Govt. Boys Degree College, Khan Kohi (Nizampur), District Nowshera which is merely 1.5 Km from my native village.

That at the time of my joining as a Principal of the Govt. Boys Degree College, Khan Kohi (Nizampur) the total strength of the <u>students was only 97</u>. With my hectic efforts and meetings with the notables of the area and get them into confidence to admit their children at the local college, resultantly now the number of <u>students are more than 437</u>.

The electricity transformer was stolen before my joining and the said college remained out of electricity power, water and computer Lab for more than one and a half year. I personally arranged the transformer and three extra electricity poles through my social efforts within a short period of two months.

# GROUNDS OF DEPARTMENTAL APPEAL.

- That the undersigned is permanent resident of District Nowshera and was appointed against the quota of settled area of Khyber Pukhtunkhwa while my services replaced at the disposal of FATA Secretariat without prior obtaining my willingness and NOC from the Honourable Governor, KPK
- ii. That the transfer of the undersigned is against the policy and Rules of Government governing the transfer and posting and as such it is not in public interest.
- iii. That during the posting as principal GDC, Khan Kohi (Nizampur) my performance remained commendable and there was no complaint what so ever regarding my performance.
- That my mother, aged more than 70-years is also a cardiac and severe diabetic and high blood pressure patient and is under continuous medical treatment and need constants look after.

It is, therefore, humbly prayed that on acceptance of this Departmental Appeal the Notification No. SO(E-1) E&AD/9-88/2017, dated 14.11.2017, may please be set-aside to the extent of the undersigned and the undersigned may be allowed to continue his duties as Principal, Govt. Boys Degree Collage, Khan Kohi (Nizampur) Dist; Nowshera

Yours Obediently

# ESTA CODE [Establishment Code Khyber Pakhtunkhwa]

### Posting and Transfer

Statutory Provision.

Section 10 of the NWFP Civil Servents Act, 1973.

Posting and Transfer. Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

# POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT

- All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- All contract Government employees appointed against specific posts, can not be posted against any other post.
- The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.

While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained

<sup>2</sup>While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP

(isra-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the 'EP Government Rules of Business, 1985, District Government Rules of 2001, Posting/Transfer Policy and other rules for the time being in make posting/transfer subject to observance of the --

## ESTA CODE [Establishment Code Khyber Pakhtunkhwa]

eeds to be obtained. Whereas, in case of postinultionsferror officers in BS: 18 and above from settled areas to FATA and vice of the Governor NWFP/shall be obtained.

- All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for atleast eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- No posting/transfers of the officers/officials on detailment basis shall be made.
- Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government Servants at the station of the residence of their parents.
- Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there in the retirement 1DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;
- In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP. Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column2 thereof:

Ī		Outside the Secretaria:	
	1.	Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief
			Miclister.

icers in BPS-17and above to afted against scheduled posts, or ுosts normally held by the APUG, PCS(EG) and PCS(SG). Heads of Attached Departments and other Officers in 8-19 & above in allthe Departments. In the Secretariat Secretaries Secretary with approval of the Chief Minister. Other Officers of and above the rank of Section Officers: a) Within the Same Department Secretary of the Department concerned. b) Within the Secretariat from one Chief secretary/Secretary Department to another. Establishment. Officials up to the rank of Superintendent: a) Within the same Department Secretary of the Department concerned. b) To and from an Attached Secretary of the Dept in Department consultation with Head of Attached Department concerned. c)Within the Secretariat from one Secretary (Establishment) Department to another

While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

> To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered. Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

aggent servants including District Govt. employees feeling aggrieved riders of posting/transfer authorities may seek remedy from the anity / the appointing authority as the case may be through tted within seven days of the receipt of such orders.

Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following

Pre-mature posing/transfer or posting transfer in violation of the provisions of this policy.

Serious and grave personal (humanitarian) grounds.

To streamline the sostings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule\_- IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- Transfer the holder of a tenure post before the completion of his tenure or extend the period of his
- Require an officer to hold charge of more than one post for a period exceeding two months.
- I am further directed to request that the above noted policy may be strictly observéd /implemented.
- All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Latter No. SOR-VI/E&AD/1-4/2003 dated 24-6-2003}.

### PLACEMENT POLICY.

In order to utilize the expertise of the officers who have received foreign training in various fields, the provincial Government has decided to adopt the Placement Policy, approved by the Prime Minister of Pakistan, and make it a part of its rosting/Transfer Policy. Placement Policy as follows:

- i) All placements would be made on the basis of merit and keeping in view the needs of the organization.
- -ii) The first priority in placement must go the parent organization of the participant from where the individual had applied. This will be in consonance with the concept of establishing the "Need" for the department and fulfilling the need through "capacity building for the organization.
- In order to follow the "bottom up approach" for Devolution, the priority within departments must go to the Districts, the Provinces and than the Federal Government.
- The second priority in placement should go to up-grading the existing training Institution within the country. The knowledge gained by the officers, will be of immense value to bring about a qualitative change in the training institutions. The following proposals are made in this regard:
  - Permanent posting of an officer to the training institutions for 2-3 years;
  - Temporary attachment with the training intuitions for 3 to 6 months for some research project on helping in developing case studies;
  - c) Earmarked as a visiting faculty member for specific subject.
- Individuals posted to their parent organizations will also organize training for their subordinates within the department, in order to transfer the knowledge and bring about a qualitative change internally;
- The Normal tenure of posting as already provided in the policy would be ensured;
- vii) No participant should be allowed to be posted on deputation to multinational donor agencies for at least 5 years;
  - A Wo participant will decline/represent against ble/her postlen

Ness been made part of the posting/transfer policy vide Urdu

# ESTA CODE [Establishment Code Khyber Pakhtunkhwa]

Posting/transfer from FATA and vice versa.

I am directed to refer to the subject noted above and to state that the Centrally Administered Tribal Areas (Employees' Status) Order 1972 (President's Order No. 13 of 1972) provides that:

"Notwithstanding anything contained in their condition of service, the employees shall from the appointed day, be the employees of the Provincial government and shall work under the overall administrative control of the Provincial government, on the same terms and conditions of service as respects remuneration, leave and pansion and the same rights as respects disciplinary matters or tenure of office as were applicable to them immediately before that day; provided that the employees shall not be entitled to deputation allowance for their service after the appointed day".

- 2. According to the Posting/Transfer Policy of the Provincial Government, the Governor NWFP and the Chief Secretary NWFP are the competent authorities for posting/transfer of Civil Servants in BS-18 and above and up to BS-17 respectively. The policy prescribes two years normal tenure of posting in FATA. Similarly, it is obligatory for all the Provincial Government employees who have been selected against Zone-I/FATA Quota to compulsorily serve in FATA for at least eighteen months.
- 3. It is evident from the above that employees serving in FATA are under the administrative control of the Provincial Government. However, after establishment of FATA Secretariat, it was felt imperative to have linkage between the Provincial Departments and the FATA Secretariat so that public service delivery does not suffer due to frequent reshuffling of staff without knowledge of that Secretariat.
- 4. Taking cognizance of frequent posting/transfer of officers/officials from FATA to settled areas and vice versa by the respective Departments without prior consultation with the FATA Secretariat, it was emphasized on all the Administrative Departments, vide circular letter No SO(E-I) E&AD/9-126/2006/VoI-II dated 26th January, 2007 that the said Secretariat should invariably be consulted before issuing orders of Posing/Transfer of Government Servants from and to FATA. However, the FATA Secretariat have frequently conveyed their apprehensions that these instructions are not being followed, and at times a very embarrassing situation for the FATA Secretariat is created as work suffers due to shortage of staff which becomes a serious issue in the prevailing law and order situation in FATA.
  - In view of above, it is reiterated that:-
  - (i) All Provincial Government Departments are directed to move proposals for posting out of an employee from FATA only when a substitute is proposed in the same case.
  - P.24 On consent from the FATA Secretariat and approval of the proposal by the competent authority, the substitute to FATA would invariably give his arrival for duty before the employee being transferred out of FATA is relieved.



- Provincial Government Departments may not accept the arrival report of an employee transferred out of FATA till his misser relieving order is issued by the FATA Secretariat,\_
- The Accountant General (PR) is also requested that Last Pay Certificate of an employee transferred out of FATA but not relieved properly by the EATA Secretariat may not be issued in any circumstances.
- Instruction issued vide letter No.SO (E-I) E&AD /9-126/2006/Voll-II dated 26th January, 2007 (quoted in Para-4 above) should be followed strictly.
- No NOC in respect of transfer from FATA to settled area issued by any Head of Line Department of FATA Secretariat should be accepted. Only those NOCs, which have been issued by the Administration & Coordination Department, FATA Secretariat. should be considered.
- Tenure of Civil Servants must be kept in view while issuing NOC for posting/transfer or considering postings/transfers.
- No NOC's should be issued in respect of employees in BS-1-15 who is from agency cadre and in whose respect Political Agent and Agency officer have been declared as appointing authorities.
- Persons appointed in agency cadre, if appointed in the settled lareas will resign from service in FATA and will resume service in settled arrears as a fresh candidate.
- NOCs may be issued in respect of employees of the Provincial cadres i.e. BS-16 and above only after completion of their normal tenure and they shall not be transferred out of FATA unless their substitutes are provided simultaneously.
- It is requested that the above Policy may be followed in letter and spirit, in further, in public interest.

( Authority: No. SOR-VI/EBAD/1-4/2008-Vol:VH Dated Peshawar, 30th Harch, 2009)

Change in policy to fill vacant posts in FATA to ensure hercer human resource management\_

> cam directed to refer to the subject and to state that the competent been pleased to make following changes to the posting/transfer Policy exemment in respect of candidates selected from Zone-I (FATA:-

> > servant recruited against Zone-I by Public Service

-Secretariat who shall endorse it to the concerned administrative department in the Provincial Government. The FATA Secretariat... shall arrange medical and security clearance and thereafter submita case through the respective administrative department seeking approval of the appointing authority. The appointment letter shall be issued by FATA Secretariat on behalf of the respective administrative department. Posting orders shall also be issued by FATA endorsing copies to the respective department where personal file of the civil servant is to be maintained. This arrangement shall be confined to recruitments made in BS-16 and 17 but shall exclusive PMS.

- In case of disciplinary action, while the appointing and appellate. authorities shall remain the same charge sheets/statement of allegations and show cause shall be prepared by FATA Secretariat and submitted in the form of a summary through Establishment Department. Leave accounts and GP Fund withdrawals shall also be dealt by FATA Secretariat based on the codal formalities as observed by the Provincial Government Departments.
- Copies of all necessary orders in respect of such officers/officials made by FATA Secretariat shall be endorsed to respective administrative departments for record.

( Authority; letter No.SOR-VI/E&AD/1-10/2009, dated 30th July, 2010.)

Guidelines for transfer/posting of Naib Tehsildars/ Political Naib Tehsildars / Assistant Political Agents.

I am directed to refer to the subject and to say that the competent authority has been pleased to approve the following guidelines for posting/ transfer of Naib Tehsildars/Political Naib Tehsildars/Assistant Political Agents:-

- The proposal will be initiated by the respective Political Agent or DCO and addressed to the concerned commissioner. If there is no disagreement the proposal will be forwarded to FATA Secretariat for further processing.
  - In case of disagreement, Commissioner will try to find a consensus candidate in consultation with Political Agent or DCO. However, if disagreement continues FATA Secretariat will make the final
  - Political Agent/DCO will ensure that while proposing the officer for transfer/gosting all the stakeholders have been consulted, particularly the LEAs who are conducting active operations in the tribal belt these days:
  - It should be ensured that the officers are not posted to the same appointments repeatedly; and that the proposal is purely based on iv. merit and has not been influenced by the outside elements.

The service profile of the proposed officer needs to be attached

- Posting of officer from Hard area to Soft area or vice versa should be one of the factor in determining the suitability.
- A routine tenure may be respected. However, due to the current:= situation in EATA there are cases of burnt out due to continuous enlergent duties. In such circumstances an officer may be recommended for posing before the normal tenure.
- Political Tehsilders (PT)/Naib\_Tehsilders (NT) will not stay in the same division for more then five years continuously and may only be posted back to the same Division after serving minimum of
- It is requested that above guidelines may be followed in letter and spirit, in future, in public interest.

(Authority; leiter No. SOR-VI/E&AD/1-4/ 2010/Vol-VIII, Dated 10th February, 2010) Inter Provincial Transfer

Attention is invited to Rule-8 of the NWFF, Civil Servants(Appointment, Promotion and Transfer) Rules, 1989 where under Inter-Provincial Transfers of employees in BPS 1 to 15 and 16 and above are permissible subject to the fulfilment of conditions laid down in the aforesaid rule. However, in most of the cases, the requests for Inter-Provincial Transfers are not strictly scrutinized in the light of the aforesaid rules which creates not only embarrassment for the SAGAD but also

- While examining cases, it has been noticed that inter-provincial transfer results in an over all increase of officials in the NWFP, which is against the downsizing policy of the Government. The un-employment situation in NWFP is more acute than in any other province. Large scale transfers of officials from other provinces would also deprive the people of NWFP from employment in other Provinces. It may, therefore, be necessary to restrict the inter-provincial transfers to very exceptional cases where a strong humanitarian ground exists or where technical expertise, which is not available in the province, is required.
- It is requested that the provisions of Rule-8 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 may be observed strictly while recommending cases of inter-provincial transfers, with full justification for

Sinority: S&GAD's letter No.SORI(S&GAD)2-27/86, dated 1.11.1997)

# ESTA CODE [Establishment Code Khyber Pakhtunkhwa]

# Identification of Unattractive/Hard Areas policy;

. I am directed to refer to the subject and to say that the Provincial Cabinet in its meeting held on 30th March, 2010 inter-zlia approved the following for the purpose

- The distinction between unattractive/hard areas should be done away with and both should be labeled as Unattractive areas.
- Existing list of FATA areas be retained.
- The following areas were recommended/approved to constitute unattractive areas in NWFP:-
  - Kohistan District.
  - Tank District.
  - Chitral District.
  - Battgram District.
  - Shangla District.
  - Hungu District.
  - areas of Mansehra (Kala Dhaka)

# Tenure of posting.

- The erstwhile normal tenure of 2 years be retained.
- Existing tenure for unattractive areas be retained. However, in case of married civil servants, transfer should be made just at the beginning of school session and tenuré should be one year instead of 1.5 year, so that academic disruptions are avoided.
- At the time of entry in service, all civil servants be asked to give 4
- After a stint of service in unattractive area, employees may be offered option to serve in district of choice.

(Authority; letter No. SOR-VI/E&AD/1-4/ 2010/Vol-VIII, Dated, 10th April, 2010)

make posting/transfer advices ........

Order-63

Plaintiff along with counsel present. Admis the contents of the plaint. Be registered. Along with the plaint, plaintiff also moved an application for grant of temporary injunction.

Counsel for plaintiff argued that according to the posting/transfer policy of Provincial Government of Khyber Pakhtunkhwa, all the transferred shall be made in the public interest and not based on malafide and under political pressure. The basic condition of obtaining NOC from the Governor of Khyber Pakhtunkhwa is a pre-condition specifically for transferring civil servant BPS-18 and above from settled area to FATA The petitioner/plaintiff was appointed initially against Zonal Allocation Commission. Service Zone-2 through Bublic respondents/defendants Chief Secretary under political pressure and with malafide intention without procuring NOC from Governor Khyber Pakhtunkhwa placed the services of the petitioner/plaintiff with FATA Secretariat. The respondents/defendants Chief Secretary is a corum nonjudice to transfer a civil servant (BPS-18 and above) of settled area of Khyber Pakhtunkhwa to FATA Secretariat without procuring NOC of governor Khyber Pakhtunkhwa. Notice of the application be issued to respondents/defendants for 51118. Meanwhile the operation of impugned transfer order No. SO(E=1)E&AD9-88/2017 dated 14.11.2017 is suspended subject to NOC of Governor Knyber Pakhtunkhwa.

> Fida Muhammad Civil Judge-VII

C. W. C. S. C. S.

Director

Education FATA Secretariat.

arbject: APPLICATION FOR IMPLEMENTATION COURT-03 ORDER DATED

19.12.2017.

litte

her Bahader Khan R/O Nizampur, presently Principal, Govt. Degree College Khan Lohi Nizampur Nowshera.

Versus

- 1. Chief Secretary Khyber Pukhtunkhwa, Peshawar.
- 4. Secretary Higher Education KPK Peshawar.
- Director Higher Education KPK Peshawar.

R/Sir.

It is with honors that vide notification no. SO(E-1)E&AD9-88/2017 dated 24-11-2017 (copy enclosed), in which my services has been placed on disposal of FATA Secretariat and the said notification has been suspended by Civil Judge Nowshera by order -03 dated 19-12-2017(copy enclosed) for information and necessary action please.

Inted:-20 12-2017.

Prof. SHER BAHADER KHAN.

PRINCIPAL

Govt. degree College Khan Kohi Nizampur, Nowshera. Plaintiff along with counsel present. Defendants absent.

Plaintiff's counsel requested for withdrawal of instant suit that

plaintiff closs not want to proceed further with the instant case.

In the light of above discussion and in absence of defendant, request accepted, and instant suit is hereby dismissed as withdrawn. No order as to cost.

File be consigned to record room after its necessary completion and compilation.

Fida Muhammad, Civil Judge-VII, Nowshera

Manual Copyrish 15 FEB 2018

ATTESTED.

STATE STED

STATE S



# Directorate of Higher Education Khyber Pakhtunkhwa Attached Department Complex, Gate, No.3, Khyber Road Peshawar

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

No.7488-98/P&D/CAP-I/General Dated Peshawar the 07/03/2016

To

S.No.	Name and Designation	DDO For
.01	Mr. Mir Zaman Principal GDC, Ghari	Govt. Girls College, Ghari Kapoora
	Kapoora.	(Mardan)
02	Mr. Irshad Ahmad Principal GDC, Yar	Govt. Girls College, Yar Hussian (Swabi)
	Hussian (Swabi)	
03	Ms. Naheed Begum Associate Professor Of	Govt. Girls Degree College, Katlang
	Islamiyat GGDC, Katlang (Mardan)	(Mardan)
04	Mr Sher Bahadar Principal GDC Khan Kohi	Goyt Girls Degree College Khan Kohi
. 1	(Nowshera)	(Nowshera)
05	Mr. Karim Khan Principal GDC, Lachi	Govt. Girls Degree College, Lachi (Koha
	(Kohat)	
06	Mr. Mohammad Nawaz Professor of	Govt. Girls Degree College, Kot Najeeb-
	Statistics/DDO of GPGC Haripur.	Ul-lah (Haripur)
07 .	Mr. Fazal Mehmood, Associate Professor of	Govt. Degree College, Khanpur (Dir-
	Pashto GDC, Gulabad Dir (Lower)	Lower)
08×	Mr. Muradullah, Associate Professor of	Govt. Degree College, Badraga
	Physics, GPGC, Dargai (Malakand)	(Malakand)
09	Mr. Mohammad Kamal Khan, Associate	Govt. Degree College, Achini Payan
	Professor of English, GC, Peshawar.	(Peshawar)
10	Mr. Mohammad Sarwar, Associate Professor	Govt. Degree College, Daraban
	of Geography, GDC, No.1 (D.I.Khan)	°(D.I.Khan)
11	Mr. Munawar Alam Associate Professor of	Govt. Girls Degree College, Chontra Sabi
	Maths GDC, Ahmad Abad (Karak)	abad (Karak)

Subject: PURCHASE OF VARIOUS ITEMS FOR THE GOVT.

I am directed on the subject cited above and to state that the Provincial Govt. is pleased to allow the purchase of revenue component in ADP allocation; copies of the detail break up are hereby attached with.

I am further directed,	to request you to kindly	complete the purch	ase till 30 <sup>th</sup> June 2016
			1

# Directorate of Higher Education Khyber Pakhtunkhwa

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

Phone No:091 -9211025 -9210217 -9210242 , FaxNo:091 -9210215					
S.No	Name and Designation	DDO for			
1	Mr.Mir Zaman Principal GDC Ghari Kapoora.	Govt:Girls College			
		Ghari Kapcora			
<u> </u>		(Mardan)			
2.	Mr.Irshad Ahmad Principal GDC Yar Hussain	Govt:Girls College			
<u> </u>	(Swabi)	Yar Hussain(Swabi)			
3	Ms. Naheed Begum Associate Professor of	Govt:Girls College			
ļ	Islamimyat GGDC Katlang(Mardan)	Katlang (Mardan)			
4	Mr. Sher Bahadar Principal GDC Khan Kohi	Govt:Girls College			
1	Nowshera	Khan Kohi			
-		Nowshera-			
5	Mr. Karim Khan nPrincipal GDC Lachi Kohat	Govt:Girls College			
		Lachi Kohat			
6	Mr. Mohammad Nowaz Professor of	Govt:Girls Degree			
	Statistics/DDO of GPGC Haripur	College Kot Najeeb			
<u> </u>	)	ul-llah (Haripur)			
7	Mr.Fazal Mehmood Associate Professor of	Govt: Degree			
	Pashto GPGC Gulabad Dir Lower	College Khanpur			
	77.	(Dir Lower			
8	Mr, Muradullah Associate Professor of	Govt: Degree			
	Physics, GPGC Dargai Malkand	College Badraga			
		Malakand.			
9 .	Mr. Mohammad Kamal Khan Associate	Govt:Degree College			
	Professor of English GC Peshawar	Achini Payan			
10-		Peshawar.			
10	Mr. Mohammad Sarwar Khan Associate	Govt:Degree College			
<del>  ,                                   </del>	Professor of Geography GDC No.1 DI Khan	Daraban DI Khan			
11	Mr. Munawar Alam Associate Professor of	Govt:Girls Degree			
	Maths GDC Ahmad Karak	College Chontra			
L. <u>.</u>		Sabir abad Karak			

# Subject: PURCHASE OF VARIOUS ITEMS FOR THE GOVT: COLLEGE BY 30<sup>th</sup> JUNE 2016

I am directed on the subject cited above and to state that the Provincial Govt: is pleased to allow purchase of revenue component in ADP allocation copies of the detail break of are hereby attached with.

I am further directed to request you to kindly complete the purchase till 30th June 2016.

EndstNo. Copy forwarded to the:-

Assistant Director (P&D)

1. Chief Planning Officer Higher Education Department Khyber Pakhtun Khwa.

2 .Ps to Special Secretary Higher Education Department Khyber Pakhtun Khwa

3. PA to Director Higher Education Khyber Pakhtun Khwa.

Assistant Director (P&D)
Directorate of Higher Education

KPK Peshawar

FIRE	// ^	25, 9211803 <u>,</u>	9213009	, 9210242 <sub>-</sub>	FAX # 091-921	<i>0215</i>
2 - 2 01	Notal					
NO. 255 78	A-I/Estt: Branch/A-12	2/New Colleges;	-	Dated Peshav	war, the	/2016 :
To .						
•				-		. !
	1. Mr Mir Z	'aman Princip	al GDC	Garhi Kapo	ora Mardan (Di	DO for
	2. Mr. Irsha	Barhi Kapoora Id Ahmad Prij	) Mardar Icinal GI	l TC Var Huc	ssain Swabi (DI	)() fa
	GGDC Y	'ar Hussain Sv	wabi)		.*	
. `	3. Mr. Zafa	r Ullah Khan	Prof: of I	English GP0	GC Kohat ( DD	O For
•		achi Kohat) Bahadur Princ	ninal GD	Civilian vest	hi, Nowshera (I	2006
	Khan Ko	hi, Nowshera	) مانت تهناری	© KHAH KO	nignowsnera (1	JDU for
	5. Mr. Moha	mmad Nawaz	Professor	of Statistics	GPGC, Haripur	(DDO for :
	GGDC Ko	ot Najibullah H	laripur)			•
•						
Subject:	STARTING A	<u>MISSION I</u>	NNEW	LY ESTAE	BLISHED COL	LEGES
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2. PA to D	irector Higher Ed	lucation Loca	l Directo	rate.	- : .	
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Oocuments-21						Page 104
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The Director Education FATA secretariat

## SUBJECT: ARRIVAL REPORT

In compliance with the notification No. SO (E-I) E& AD/9-88/2017 Govt. of KPK Peshawar Dated 14-11-2017.

I hereby submit my arrival report today the 18-04-2018 A/N it may kindly be reported please.

Dated: 118404-2018

Professor Sher Bahadur

Principal

Govt. Degree College Khan Kohi

Nizampur (Nowshera)



## OFFICE OF THE PRINCIPL GOVT. DEGREE COLLEGE KHAN KOHI (NOWSHERA)

### CERTIFICATE OF TRANSFER OF CHARGE

1. Certify that we have on the Fore/afternoon of this day 18-04-2018 A/N) respectively made over and receive

Charges of this office of the Principal, GDC Khan Kohi (NSR) vide Notification No. SO (E-I) E & AD/9-88/2017 Dated: 13-12-2017

2. Particulars of cash and important confidential Documents handed over are noted on the reverse.

Station: Govt. Degree College Khan Kohi Nizampur (Nowshera)

Signature: of Relieved

Vide Notification No. SO (E-1) E & AD/9-88/2017 Dated 14-11-2017

Government Servant Mr. Sherbahadar Cham

Designation. Professor BPS-20

Signature of relieving

Government servant Dr. Muhammad Nisar Khan

Designation. Associate professor BPS-19

Station: Govt. Degree College Khan Kohi Nizampur (NSR)

Endst:No 133-140

Dated 18-04-2018

### Forward to the:

- 1. Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
- 2. The Director Higher Education Khyber Pakhtunkhwa Peshawar.
- 3. District Accounts Officer Nowshera.
- 4. Secretary FATA secretariat Peshawar.
- 5. JMC/Principal GPGC, Nowshera.
- 6. Official concerned.
- 7. Personal File.



# DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA KHYBER ROAD, PESHAWAR

Tel # 091-9210242 / 9211025 Fax # 091-9210215 E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar1

/ CA-I/ Estt: Branch/A-i2/DDO File (Male)

Dated Peshawar the

To

The Principal

Govt; Degree College, Khan Kohi

(Nowshera):

SUBJECT

COMMITTEE REPORT REGARDING PURCHASED ITEMS FOR GOVT; GIRLS DEGREE COLLEGE, KHAN KOHI (NOWSHERA) BY EX-PRINCIPAL GOVT; DEGREE COLLEGE,

KHAN KOHI (NOWSHERA)

Memo:

I am directed to refer to the subject cited above and to state that as per report of Committee Members Constituted for physical verification for Govt; Girls Degree College, Khan Kohi (Nowshera) (Copy enclosed) wherein the Committee reported that the stock register and file/ record etc for the purchase of plant/machinery were not handed over to the Incharge Principal Govt; Girls Degree College, Khan Kohi (Nowshera) and the same is still kept with Prof: Sher Bahadur, Ex-Principal, Govt; Degree College, Khan Kohi (Nowshera) now transferred to FATA.

In view of the above, the Ex-Principal Govt; Degree College, Khan Kohi (Nowshera) may be contacted immediately and resolve the issue at the earliest under intimation to this office.

Yours Faithfully,

(Mohammad Gashir)
DY: DIRECTOR (ESTABLISHMENT)

Endst: No. 307 59-60

Copy of the above is forwarded to the:-

- 1. Principal Govt; Degree College, Landi Kotal (Khyber Agency)
  Prof: Sher Banadur to contact the members of the Committee in the matter.
- 2. / Dr. Faiq Jan, Associate Prof:/ Convener and Members of the Committee with the remarks to complete the task assigned to them within a fortnight (02 weeks) positively.

DY: DIRECTOR (ESTABLISHMENT)

# ATTENDANCE CERTIFICATE

it is certified that Mr. Sher Bahadur (Professor of Statistics) Principal GDC Landi Kotal attended GDC Khan Kohi today dated 13/08/2018 in connection with physical verification of a laboratory items and others of the GGDC Khan Kohi.

GDC Khan K**Pirincipal**Nizampyr Nowsheral
(Nizampur Nowshera)



Following laboratory items remained deficient so far and communicated to the Principals of the respected colleges (Government College for Boys Khan Kohi and Incharge Principal Government Degree College for Girls Khan Kohi).

### 1. Physics:-:

I) Spectrometer				. 01
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### 2. Chemistry:-

I) Refrectrometer	-0:

## 3. Biology (Botany and Zoology):-

I) Gel Electropolsis

Power Supply 02

Furthermore the furniture along with the respective stock register is handed over to the incharge Principal Government Girls Degree College Khan Kohi. that she will produce a list of deficiencies to Dr. Faiq Jan (Chairman Physical Verification Committee) to finalize the report. The report is due within two weeks completed in all respect. But it is recommended that the report should be finalized in all respects after the arrival of the DDO Government College For Girls Khan Kohi, who is on Ex-Pakistan leave for Hajj.

Dr: Faiq Jan

Chairman (Physical Verification Committee)

13-08-2018

Sher Bahador Sb

Shah Hussain Sb

Member

Madam Mehwish Rafi

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6.00

سعه الحول خراب كرنے دالے پر وفیسروں كا تا دله كما جائے ، واي علقے اللہ مسابقہ مارین جنا بعلی نیا ہے كا دالة كاع امر مرض ف تار

آگراه فلک (فلت باکستان) کوفیست وکی نفک بوش ماده فلک یک بیدت بین حل تعلیم
 آگراه فلک نکایست از فلت با کستان کا بینات کا ماده به بروام مرت بین برگس برواری با در فرایس برگس برگس برواری باست و این که بینات در فرایس برواری باست و این که بینات در فرایس برواری باست برواری با ساخت برواری با مادی بینات برواری با در بادر اینات برواری بادر اینات برواری بادر اینات برواری بادر بادر اینات برواری بادر برواری بادر اینات برواری بادر برواری بروا

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ر نوشبره : طلبا فرخ پرشیل کے متال الگادیا : تتاریخ کیلئے کانٹی کو تالا لگادیا : وشره ۱۱ کی این ایا ملاته خود مقام پر عم کان پرش کے جاد نے کیلئے طلباء نے احتای مقابرہ کیاد کانگی کرالا لکاکر مذاق ایل متوجہ چر تبریدہ کا

سویدار کل محد زرد کل اور دیگرنے کریند بڑے کے ا جَابِی بِنَصْ سِے قطاب کرتے ہوئے کہا کہ علاقہ فوڈہ نفاع پونے کے میڈالڈن میں وائم ٹوکٹا کی معرضینا کا میں میں کہا مکونون نئے کے کوکڑ اولون کا بھر بھن جالی پسٹوں پر فقرد في ل كور تمنث ذكرى كأرفي خال كوى فقام ر رفیل کتار الکرمتر دکرنے اور کلر دایدا ک علاست كل عامله جماتين بشاور ، نوشمره أور أكد میتالوں مل مانے رجور میں اکثر أوات





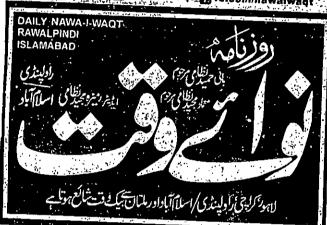
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المراح ا



### سَوْلُونُ السَّاعَتُ كُمْ 7 7 سَالَ :

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علد بدو 2 رق الله 1439 م 17 جري 2018 م 14 م 2074 م خات المركز الله الم 193 م 193 م الله الم 193 م 193

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ین دالمی کو اس کے والد ( میرین) مع با قاعوه بات فی جائے تی تالمہ وہ اپنے بیٹے کو مستماع ور ہم

اس کے علوق قالع بی طارور الی بی جائے ہی ۔ اگر مغیرط عالج کے انجلوں نے مطابق در بس طوی این کم کال مرے کے لیے نیکار ہے کو الل کے اسی مست بمل کو تعماری جا ہے۔ اور اللی صنے کسی عم کی باز کریں

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(3 کابای فلزان کور کشرف کوسط کربی ویش کابی او کی سے مبدلو کی۔ الماموي إلى أم ما لومسين عماص الله في الونسلنات في قاع

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Correspondence 7 in characte

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### OFFICE OF THE PRINCIPAL GOVT, DEGREE COLLEGE KHAN KOHI NIZAM

No:-2851

datec

To

วายายา*ะ* เล่ม**ห้อ**ัดิโ

The Director

**Higher Education KPK** 

Peshawar.

SUBJCT: - Relieving in absentia

Memo:

Reference vide letter no. SO(C-II) HED/2-5/2017/2870-2957 dated 07-02-2017, Mr. Ikram Ullah Pashto Lecture have been transferred / service placed at the disposed of FATA in the best interest of public, therefore he have relieved from duty vide letter no.2716 dated 09-02-2017.

He filed an application in the honorable court of SENIOR CIVIL JUDGE NOWSHERA for cancellation of transfer. After judgment, the case is filed without taking any action (Photo copy attached).

His salary is still drawing from this college account although a registered copy of relieving is submitted to D.A.O. Nowshera even he did not perform his duty since 10-02-2017.

Mr. Barket Shah Assistant Professor of Pashto took charge in this college on 24-05-2017

Therefore it is requested that to stop his salary and May directed him to join his services in FATA Secretariat.

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

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

Copy to:

1. P.S. to Secretary, Higher Education KPK Peshawar.

2. Coordinator/Principal GPGC Nowshera.

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

20



نظام ہور کو تمنٹ ڈکری کائی خاتوں، پر وفیسر شہونے سے طلباء مرایا احتجاج طلباء کائی مال خانی : و نے کا خدش ہورے کی وزیرے تو الدویزات کے پر وشر تحریا ہم ملا ہدر (مہد، باسمان) کوشٹ ڈکری کا نے سرنا ماروں کے ماہوں کی ماہوں کے ماہوں ک

المناس ا

Mr. Ikramullah Khan, Lecturer in Pashto GDC Khanpur.  Subject: Relieving in absentia:  Memo:  Reference Directorate Higher Education Department Pesha etter No.SO(C-II)HE/2-5/15/Surplus Staff/, you have been transferred to Khan in the best public interest.  You are therefore directed to return (Almara, Charpies, Ch ables Fans) that you have taken come for your personal use, immediately.	No		Dated Khanpur the $4 - 8$	2015
Memo:  Reference Directorate Higher Education Department Peshaletter No.SO(C-II)HE/2-5/15/Surplus Staff/, you have been transferred to Khan in the best public interest.  You are therefore directed to return (Almara: Charpies Cha	. · · · · · · · · · · · · · · · · · · ·	Lecturer in Pashto		
Reference Directorate Higher Education Department Pesha etter No.SO(C-II)HE/2-5/15/Surplus Staff/, you have been transferred to Khan in the best public interest.  You are therefore directed to return (Almara: Charpies Ch	Subject:	Relieving in absentia.		
You are therefore directed to return (Almara, Charpies, Charbies,		- Tarana and an aciolate	mand coordinate peparitie	iii resnawa
	effer No.S n the best	O(C-II)HE/2-5/15/Surplus Sta	aff/,you.have been transferred	I to Khan Kh
Printzipal	n the best	O(C-II)HE/2-5/15/Surplus Sto public interest. You are therefore dire	aff/,you have been transferred	to Khan Kh

Secretary Higher Education Department, Khyber Pakhtunkhwa, Peshawar.

2. Director Higher Education Department, Khyber Pakhtunkhwa, Peshawar.

3. Principal, GDC Khan Khoi, Nizampur.

Total: -	- 1.	ું દેશ	 3.	
			 •	

Principal/DDO is advised to look into the matter personally and recovery be made from the person at fault and compliance reported in annotation.

## PARA NR 13 (2009-2015) IRRECHEARITY COMMETTED IN PAYMENT OF STUDENTS SECURITY AMOUNTING TO RESERVE

Rs. 5000:- were drawn out of Private Fund an accounts of student's security. If has been observed that neither signature of the students nor application found of precord. The irregularities/shortcomings noticed their in are noted against reach: -

#### Detail is as under: -

SNO.	Voucher No: & Date.	Amounts.	Purpose.
1.	1 di: 10/2013.	Rs. 1500/j	Security paid to Mazhar
		<u> </u>	Mehmood F.Sc Session 2012- 2013)
2.	1 dt: 1/2014	Ks. 3500/-	Security paid to Seven
			Students @ Rs. 500/- each.
l	Total: -	Rs. 5000/	

Principal/DDO is advised to recover the amount from the person at fault and deposit into Private Fund under intimation to audit.

# PARA NO. 14 (2069-2015) BREEGULAR EXPENDITURE ON ACCOUNTS OF REPAIR C - VEHICLE A-1285 DATRUM.

Rs. 16860/- were drawn out of private fund on accounts of repair of Vehicle S-1286 during cheeking record of the local college, it has been observed that the amounts shown expended during the year 2013 on the repair of Ladam A-1285 but the Vehicle is still garaged for more then 10 years as is evident from Log Book (Photocopy) attached).

### Detail is as under: -

		·		
SNO	Voucher No: & Date.	Amounts,	Purpose.	7.
1.	12 dt: 9/2013	Rs. 1650/-	Diesel for Datsun.	i de
2	13 dt: 8/2013	Rs. 2450/-	Repair of Datsun.	-
3.	3 dt: 4/2010	Rs. 3585/-	-d.	
<u> </u>	12 dt: 11,2013	Rs. (1000/-	Diesel for Datsun.	
5.	17 dt: 11.2013	Rs. 42.40/-		
6.	23 de 11/2013	Rs. 300/-	Dist.	-
<u> </u>	11 in 12 2013 🕠	Rs. 2935/-	Suli and Wiring.	_ •
:	e Comite a	Rs. 16860/-		لىنتىـ ئاير

Principal DDO is advised to look into the marker per enally and have the factual position and compliance reported with Proof.

# PARA NO. 15 (2009-2015) (2009-2015) NON PAINTENT OF FEE CONCESSION TO STUDENTS FOR 2014-2015

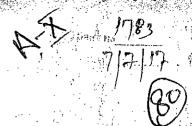
Ra. 13600/- of Tuition Fee refund vide challan No. 63 dt: 29-9-2014 and deposit? in PLS Account No. 4/32-1 National Bunk of Pakistan Elian Fur Branch (Dist: Haripur). Turing security of feets neession life it has been observed that aeither payment made to become in a cylication of emients found in record. The Chairman Committee of Feet Ression, has given confidente that meither he has been received the said amounts nor ment made to the students.

Principal DDO is advised to recover the amounts from the person at fault

(79)



The Secretary Higher Education Peshawar KPK.



Subject:- Reminder about the Cancellation order No. So (E-I) E & AD/9-88/2017.at S.No. 22.

Respected Sir,

It is submitted for your kind information that the application on the subject cited above has been sent to your good office on 20-06-2017 for cancellation of my transfer under the jurisdiction of appeal but the response about the said application is still awaited. As, I belong to the settle area & as per rules of the government policy the transfer order may please be enhanced and consider in the light of submitted application on 04-02-2015 which was duly signed by the principal concern:

I am the head of family members in regard to pick and drops my children at school and their look after.

It is therefore, requested that the transfer order may please be cancelled and it may be considered according to the posting proforma attached.

Dated: 30-06-2017

Your's Sincerely.

Abid Hussain

Associate Professor Statistics

Govt. Degree College

Khan Koi Nizampure (Nowshera)

The Secretary Jebrain Jebrain Lefth (8) Subject 10 Application, whom to consider to oder No So (€-1) E 9 KD (9-58) 2017 at SINO. 12 Amos the adjusted applicantions of the duly regard by the Transfer fourth under Doniful right appliation at DHE The applications on 20/6/17 then Apr, Sidnetted remider applitues on \$5/6/12 , with the further sagest of submitteend application on 1917/17. but still now me is waiting for the norfination oral hoppelly I am the single male 13/11 6 where at home pulls and otrops of school children from city school Heellin about to home Si vice tressa (vois I region yours good honors huilt Cancel or adjust my postury with the reference of such that application of the second of the second



# MUHAMMAD IDREES KHATTAK Member Provincial Assembly

PK-15 Nowshera Date: 1/1/ My Dear Mushtary Ghani St. Minister For Hogher Edu. KPIL I hope you will be in beller condition. It is Straigly, requested that Mr. Abtol Hurson Associate part of Stats of GDC Khan Kahi Nizampur (NSR) is very close to me the hearts. to Doth newsharm, I am strongly intrested to him & recommended Concellation of his transfer from Goc Knowledin Alzarpur 40 Dagar Primer as per rule polocos of the postung is placed on Domicile basis. More over, Abid Husbain Associate Doof (APS-19) GDC than Kihi may please be adjusted as principal of the I show be very thanked full for this art of 1000 de Said College against the Valan, Suy Utes A. Fares Wexpu DM-Mo probosalo. fors wrother. Advisor to Chief Minister for 03779129 HB Higher Education & Information& Public Relations Departments 1721-9731218 - Khyber Pakhtunkhwa

# DIRECTOR E OF HIGHER EDUCATION KHYDER PAKETUNKHWA,

r road peshawar

# 091-9210242, 9211025/Yax # 9210215 Branch/ A-12/General Transfer & Complaint

Carrier Charlinge Caego, Cowences. The Principal

SÓBJERRE Memo:

APPLICATION FOR RELEASE OF SALARY

I am directed to read to the application dated 15.02.2018 in of Abid Hussam, Associate Professor of Statistics, for offices, Khan Robi (Nowshera) requesting therein for release of subary and to male that the Director, Higher Education, Khyber Felchtunkhwa has regretted is comes, and directed to ask the officer concerned to get himself properly allow the relievely as he is under transfer to Gove Dogree Callege, I. again and otherwise straid disciplinary action will be initiated against him.

I am durther directed to state that being JMC Coordinator. other concerned officers of Govt; Degree College, Khan Kohi (Nowshere) who time theer transferred to other College, may be released or their duties reprodu earlies under intimation to this office, otherwise disciplinary action with mittened egainet the defaulting officers.

Multo

## MOST IMMEDIATE/TIME LIMIT CASE/OUT TODAY





## GOVERNMENT OF KHYBER PAKHTUNKHWA GHER EDUCATION, ARCHIVES & LIBRARY DEPARTMENT

SO(Lit)HED/4-9/2020/SA-1192-1193-1397/2019/Ikram Ullah & Others Dated the Peshawar August 18, 2023

The Director,

Higher Education Khyber Pakhtunkhwa, Rano Ghari, Peshawar.

Attention:

Assistant Directort (Litigation)

Subject:

SA NO. 1397/2019 IKRAM ULLAH & OTHERS VERSUS GOVERNMENT

OF KHYBER PAKHTUNKHWA.

I am directed to refer to your office letter No. DHE/AD(Lit)/SA/3311/ dated 21/06/2023 on the subject cited above and to return herewith the enquiry report along-with all annexures for submission to Khyber Pakhtunkhwa Service Tribunal, Peshawar to avoid any adverse action of Tribunal, please.

2. Being a court matter, the case may be treated as "Most Urgent".

Encl: As Above

Section Officer (Litigation-II)

Endst: No. & date even.

PA to Deputy Secretary (Lit), Higher Education, Archives & Libraries Department Khyber

Pakhtunkhwa:

J. B.

ed Englier Education 7 3 also 2023

Officer (Litigation-II)

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