

FORM OF ORDER SHEET

Court of _____

Appeal No. 2215 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2023	<p>The appeal of Mr. Gohar Khan presented today by Mr. Fazal Shah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 2215/2023

Gohar Khan.....Appellant

V E R S U S

Govt. and Others.....Respondents

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Dated:-26-10-2023

Appellant
Through

Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan,

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841
Email:- fazalshahmohmand@gmail.com

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 2215 /2023

Gohar Khan, Deputy Director Establishment (BPS-18), Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar.

.....Appellant

V E R S U S

1. Govt. of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary, Higher Education, Archives & Libraries, Department, Peshawar.
3. Fayaz Ahmad, Assistant Professor of History (BPS-18), Govt. College, Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE NOTIFICATION DATED 24-07-2023 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM THE POST OF DEPUTY DIRECTOR, ESTABLISHMENT, DIRECTORATE OF HIGHER EDUCATION TO THE POST OF ASSISTANT PROFESSOR OF LAW, GOVT. COLLEGE, SHAWAR AND AGAINST WHICH REPRESENTATION DATED 25-07-2023 OF THE APPELLANT HAS NOT BEEN RESPONDED SO DESPITE THE LAPSE OF REQUISITE PERIOD.

PRAYER:-

On acceptance of this appeal the impugned Notification dated 24-07-2023, may kindly be set aside and the appellant may kindly be allowed to perform his duties as Deputy Director (Establishment), at the Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar.

Respectfully Submitted:-

1. That the appellant was initially appointed as Lecturer (BPS-17) and with the passage of time was promoted as Assistant Professor (BPS-18) and since appointment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That according to the rules notified vide Notification dated 18-09-2019, the post of Deputy Director, at the Directorate of Higher Education, is to be filled 25% by promotion and 75% is to be filled by transfer from amongst the Assistant Professors from Govt. Post Graduate Colleges for a period of three years.

It is worth to mention that the appellant was transferred as Deputy Director (Establishment), at the Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar vide Notification dated 23-02-2022 who accordingly took over charge of his post. **(Copy of Notification dated 18-09-2019 & Notification dated 23-02-2022 is enclosed as Annexure A & B).**

3. That a Proposal was moved regarding Transfer/Posting of various incumbents, including the appellant at Serial No 2, which was not favored by the Minister concerned as well respondent No 2 as evident from Summary dated 03-05-2023 on the ground of incomplete tenure, thus the name of the appellant was remove from the proposal. **(Copy of Proposal dated 28-04-2023 & Remarks dated 03-05-2023 is enclosed as Annexure C).**
4. That accordingly Election Commission of Pakistan was approached for NOC/Approval vide Letter dated 08-05-2023 in respect of two incumbents other than the appellant which NOC/Approval was accordingly communicated vide Letter dated 31-05-2023 in respect of the stated two incumbents, only. **(Copies of Letters dated 08-05-2023 & Letter dated 31-05-2023 is enclosed as Annexure D & E).**
5. That transfer posting of some incumbents was notified vide Notification dated 08-05-2023 and the honorable Chief Minister of the Province was pleased to impose complete ban on inter-district transfer with exclusion to transfer within the District with certain conditions including tenure. **(Copy of Notification dated 08-05-2023 & Letter dated 29-05-2023 is enclosed as Annexure F & G).**
6. That to the utter shock and dismay, again Note was processed from the transfer of the appellant on 13-07-2023 wherein it was incorrectly mentioned that the appellant has completed his tenure of two years and the Election Commission of Pakistan was also approached for the NOC/Approval vide Letter dated 14-07-2023 which was responded vide Letter dated 20-07-2023 that the NOC has already been issued vide Letter dated 31-05-2023. It is worth to mention that the stated NOC was regarding two other Assistant Professors namely Imran Khan and Said Wali. **(Copy of Letters dated 13-07-2023, Letter dated 14-07-2023 & Letter dated 20-07-2023 are enclosed as Annexure H, I & J).**
7. That consequently the appellant was illegally transferred vide Notification dated 24-07-2023 and posted as Assistant Professor of Law at Govt. College Peshawar. **(Copy of**

Notification dated 24-07-2023 is enclosed as Annexure K).

- 8.** That the appellant preferred Departmental appeal on 25-07-2023 which has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of departmental appeal dated 25-07-2023 is enclosed as Annexure L).**
- 9.** That the impugned Notification dated 24-07-2023 is against the law, facts and principles of justice on grounds inter alia as follows:-

GROUND:-

- A.** That the impugned Notification is illegal and void ab-initio.
- B.** That the appellant is not treated in accordance with law and rules on the subject in violation of Article 4, 10 and 25 of the Constitution and law of the land.
- C.** That the post against which the appellant was transferred is tenure post, thus the appellant could not be transferred before completion of three years tenure, thus the appellant has been transferred pre-mature as per numerous Judgments of the Apex Court as well as this honorable Tribunal, on this score alone the impugned Notification is liable to be set at naught.
- D.** That strangely the impugned Notification has been issued during ban period, hence not tenable in the eyes of law.
- E.** That the impugned Notification is based on malafide, which is evident from the way the appellant is treated as the Election commission has held the same as contrary to its directions vide Letter dated 03-08-2023, on this alone the impugned Notification is liable to be set at naught. **(Copy of Letter dated 03-08-2023 is enclosed as Annexure M).**
- F.** That the impugned Notification is in violation of transfer posting policy of the provincial Govt. as the same is neither in public interest nor in exigency of service, hence too liable to be struck down.
- G.** That the impugned Notification smacks malafide, as the appellant is treated in manner not known to law.
- H.** That the appellant is victimized for no omission or commission on his part.

I. That the appellant seeks the permission of this honorable Tribunal for further/additional grounds at the time of arguments.

It is therefore prayed, that appeal of the appellant, may kindly be accepted as prayed for.

Any other relief deemed appropriate in the circumstances of the case and not specifically asked for, may also be granted in favor of the appellant.

Dated:-26-10-2023

Appellant
Through

Fazal Shah Mohmand,

Ibad Ur Rehman Khalil

&

Basee Ahmad Shah
Advocates, Peshawar

LIST OF BOOKS

- 1. Constitution 1973.
- 2. other books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

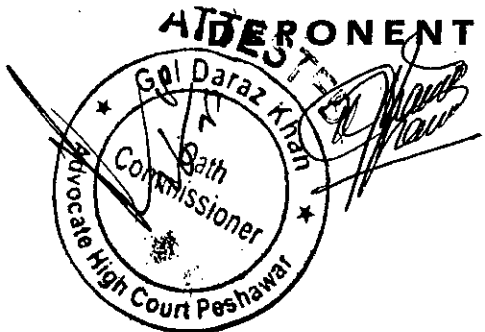
ADVOCATE

AFFIDAVIT

I, Gohar Khan, Deputy Director Establishment (BPS-18), Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar, (the appellant) do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by

Fazal Shah Mohmand
Advocate Supreme Court
Pakistan



5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No _____/2023

Gohar Khan.....Appellant

V E R S U S

Govt. and Others.....Respondents

APPLICATION FOR THE SUSPENSION OF IMPUGNED
NOTIFICATION DATED 24-07-2023, TILL THE FINAL DISPOSAL
OF TITLED APPEAL.

Respectfully Submitted:-

1. That the above titled appeal is being filed today, in which no date of hearing has been fixed so far.
2. That the facts and grounds of appeal may kindly be considered as integral part of this application.
3. That the applicant/appellant has got good prima facie case and is sanguine of its success.
4. That the balance of convenience also lies in favor of the applicant/appellant.
5. That the applicant/appellant is still holding the charge of his post and if the impugned order is not suspended the applicant/appellant will suffer irreparable loss.

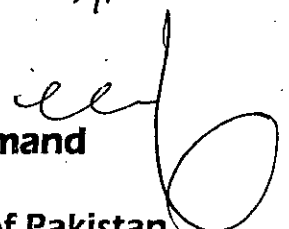
It is therefore prayed that on acceptance of this application, the impugned Notification dated 24-07-2023, may kindly be suspended till the final disposal of the titled appeal.

Dated:-26-10-2023

Appellant

Through

Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan



6

AFFIDAVIT

I, Gohar Khan, Deputy Director Establishment (BPS-18), Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar, (the appellant) do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by

[Handwritten signature]

**Fazal Shah Mohmand
Advocate Supreme Court
Pakistan**

[Handwritten signature]

DEPONENT



7

Anex "A"



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

Dated Peshawar the September 18, 2019

NOTIFICATION:

No.SO(C-IV)HED/SSRC/Directorate of Higher Education Department/2019/ :- In pursuance of the provisions contained in sub-rule(2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of this Department Notification No. S.O (C)5-2/70(E) dated: 09.05.1978. the Higher Education Archives & Libraries Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in Column No. 3 to 5 of the appendix which shall be applicable to the posts in the Directorate of Higher Education specified in Column No.2 of the said appendix.

APPENDIX

Sl. No.	Nomenclature of the post	Minimum qualification for appointment by initial recruitment or by transfer	Minimum qualification for appointment by transfer	Age limit	Method or Recruitment
1	Director (BS-20)	---	---	---	By transfer from amongst the Principals/Professors in BS-20 of Govt. Post Graduate Colleges/Govt. Degree Colleges.
2	Additional Director (BS-19)	---	---	---	By transfer from amongst the Associate Professors in BS-19 Govt. Post Graduate Colleges/Govt. Degree Colleges.
3	Deputy Director (BS-18).	---	---	---	(a) Twenty-five (25%) by promotion on the basis of seniority-cum-fitness from amongst the Assistant Directors (BS-17) with at least five (05) years' service in BS-17; & (b) Seventy-five (75%) by transfer from amongst the Assistant Professors from Govt. Post Graduate College for a period of three (03) years.
4	Assistant Director /Statistical Officer (BS-17)	---	---	---	(a) Fifty (50%) by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendent, having Bachelor Degree from a recognized University with three (03) years' service as such; & (b) Fifty (50%) by transfer from amongst the Lecturers from Govt. Colleges of Khyber Pakhtunkhwa for a period of three (03) years.


[Signature]
Section Officer (CIV)
Govt. Of Khyber Pakhtunkhwa
Higher Education,
Archives & Libraries Department


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ATTEST *[Signature]*

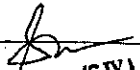
5	Superintendent (BS-17)	---	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographers having at least five (05) years' service as such. Note: - For the purpose of promotion, a joint seniority list of Assistants and Senior Scale Stenographers shall be maintained.
6	Assistant (BS-16)	At least Second-Class Bachelor's Degree or equivalent qualification from a recognized University.	---	20 to 32 years	(a) Seventy-five (75%) by promotion on the basis of seniority-cum-fitness from amongst the Senior Clerks with at least five (05) years as Junior Clerk & Senior Clerk; and (b) Twenty-five (25%) by initial recruitment.
7	Senior Scale Stenographer (BS-16)	---	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers with at least five years (05) service as such.
8	Computer Operator (BS-16)	At least Second-Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT 04 years) from a recognized University or Second Class Bachelor's Degree from a recognized University with one-year (01) diploma in Information Technology from a recognized Board of Technical Education.	---	18 to 28 years	By initial recruitment
9	Stenographer (BS-14)	(i) At least Second Division Intermediate Certificate or equivalent qualification from a recognized Board; (ii) A speed of fifty (50) words per minute in shorthand in English and thirty-five (35) words per minute in typing; and (iii) Knowledge of computer in using MS Word & MS Excel.	---	18 to 30 years	By initial recruitment
10	Senior Clerk (BS-14)	---	---	---	By promotion on the basis of seniority-cum-fitness from amongst the Junior Clerk with at least two (02) years' service as such.


Command by Ram Sannar


 Section Officer (C-IV)
 Govt of Jharkhand
 Archives & Libraries Department

ATTES 

11	Junior Clerk (BS-11)	(i) At least second Division Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) A speed of thirty (30) words per minutes in typing.	---	18 to 30 years	a. Thirty-three (33%) by promotion on the basis of seniority-cum-fitness from amongst the Naib Qasid, Chowkidar, Behishtis, Cook, Bearers and Laboratory Attendants other equivalent posts in the Directorate of Higher Education Khyber Pakhtunkhwa with two years (02) service as such who have Secondary School Certificate; and b. Sixty-seven (67%) by initial recruitment. Note: - For the purpose of promotion, there shall be maintained a joint seniority list of Naib Qasid, Chowkidar, Behishtis, Cook, Bearers and Laboratory Attendants including other equivalent posts with reference to the dates of their acquiring the Secondary School Certificate: Provided that: - a. If two or more officials have acquired the Secondary School Certificate in the same session, the inter-seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and b. Where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.
12	Library Clerk (BS-08)	At least Second Division Intermediate Certificate or equivalent qualification from a recognized Board.	---	18 to 30 years	By initial recruitment
13	Store Keeper (BS-06)	At least Second Division Intermediate Certificate or equivalent qualification from a recognized Board.	---	18 to 30 years	By initial recruitment
14	Driver (BS-06)	HTV/LTV License. Preference will be given to those who have sufficient experience in driving, repair and maintenance of Vehicles	---	18 to 40 years	By initial recruitment
15	Naib Qasid (BS-03)	Preferably Literate	---	18 to 40 years	By initial recruitment
16	Chowkidar (BS-3)	Preferably Literate	---	18 to 40 years	By initial recruitment
17	Behishti/Cook/Bearer (BS-03)	Preferably Literate	---	18 to 40 years	By initial recruitment


 Section Officer (C.I.V.)
 Govt. of Khyber Pakhtunkhwa
 Higher Education,
 Archives & Libraries Department.

15/05/2023


10

18	Laboratory Attendant (BS-03)	Preferably Literate	---	By initial recruitment
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SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION ARCHIVES AND LIBRARIES DEPARTMENT.

Endst; No. & Date as above.
Copy to forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa Public Service Commission, Peshawar.
5. The Accountant General Khyber Pakhtunkhwa, Peshawar.
6. The Director Higher Education Department, Khyber Pakhtunkhwa.
7. The Manager Govt. Printing Press, Khyber Pakhtunkhwa.
8. The Deputy Director, HEMIS Cell.
9. All District Accounts Officers, Khyber Pakhtunkhwa.
10. PS to Chief Minister, Khyber Pakhtunkhwa.
11. PS to Chief Secretary, Khyber Pakhtunkhwa.
12. PS to Secretary, Higher Education Department.
13. Master File.

[Signature]
18/09/19
SECTION OFFICER (C-IV)

ATTESTED
[Signature]

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(11)

Anex "B"



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

Dated Peshawar the 23rd February, 2022

NOTIFICATION

NO.SO(C-II)/HED/2-5/2022/DD/AD: The Secretary to Govt. of Khyber Pakhtunkhwa Higher Education, Archives & Libraries Department is pleased to order posting/transfer of the following teaching staff of college cadre in Higher Education Department, with immediate effect, in the best public interest:-

S #	Name/Designation/BPS	Present posting	Proposed posting	Remarks
1.	Ms. Khadija Inayat, Assistant Professor of History (BS-18)	Deputy Director (Female) at Directorate of Higher Education	GGDC Zaryab Colony, Peshawar as Assistant Professor of History (BS-18)	Vice Sr. No.2
2.	Ms. Sadia Shah, Assistant Professor of Geography (BS-18)	GGDC Zaryab Colony, Peshawar	GFCW Peshawar	Vice Sr. No.7
3.	Mr. Abdur Rasheed Anwar, Assistant Professor of Health & Physical Education (BS-18)	Inspector Physical Education/ Deputy Director (Sports) at Directorate of Higher Education	GC Peshawar as Assistant Professor of Health & Physical Education (BS-18)	Vice Sr. No.6
4.	Khawaja Muhammad Saqib, Lecturer in Computer Science (BS-17)	Assistant Director (General) at Directorate of Higher Education*	GC Peshawar as Lecturer in Computer Science (BS-17)	AVP
5.	Mr. Gohar Khan, Assistant Professor of Law (BS-18)	GDC Wadpugga, Peshawar	Deputy Director (Establishment), Directorate of Higher Education	AVP
6.	Mr. Arshad Hussain, Assistant Professor of Health & Physical Education (BS-18)	Govt. College Peshawar.	Inspector Physical Education/ Deputy Director (Sports), Directorate of Higher Education	Vice Sr. No.3
7.	Ms. Farida Bibi, Assistant Professor of Home Economic (BS-18)	GFCW Peshawar	Deputy Director (Female), Directorate of Higher Education	Vice Sr. No.1
8.	Mr. Ihtesham Aziz, Assistant Director (P&D) (BS-17)	Directorate of Higher Education	Assistant Director (General), Directorate of Higher Education	Vice Sr. No.4

SECRETARY
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN:

Copy of the above is forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director-IT, HEMIS Cell, Higher Education Department.
4. Principals of Govt. Colleges, concerned.
5. PS to Minister Higher Education Department.
6. PS to Secretary, Higher Education Department.
7. All concerned.
8. Master File.

(II-28921100) PS to Secretary, Higher Education Department.

(VAVE) PS to Secretary, Higher Education Department.

8. Master File

(SAMEERA SABA)
SECTION OFFICER (COLLEGES-II)

Handwritten signature

Handwritten signature and date: 23/02/2022

(12)

Anex "C"

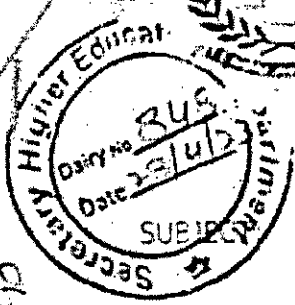
**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

**NOTE FOR MINISTER HIGHER EDUCATION ARCHIVES &
LIBRARIES DEPARTMENT**

TRANSFER/POSTING PROPOSAL

The Directorate of Higher Education, Khyber Pakhtunkhwa has forwarded a proposal for transfer/posting of the following teaching faculty and Deputy Directors (BS-18) at Directorate of Higher Education, Khyber Pakhtunkhwa:-

S#	Name of Officers	Present Station	Proposed Station	Remarks
1.	Mr. Fayaz Ahmad, Assistant Professor of History (BS-18)	Govt. College Peshawar	Deputy Director (Establishment) at Directorate of Higher Education	Vice Sr. No.2
2.	Mr. Gohar Khan, Deputy Director (Establishment) (BS-18)	Directorate of Higher Education	Assistant Professor of Law (BS-18) at GDC Ring Road, Peshawar	AVP
3.	Mr. Imran Khan, Assistant Professor of Urdu (BS-18)	Govt. College Peshawar	Deputy Director (Monitoring) at Directorate of Higher Education	Vice Sr. No.4
4.	Mr. Jamil Ur Rehman, Deputy Director (Monitoring) (BS-18)	Directorate of Higher Education	Assistant Professor of Pak Study (BS-18) at Govt. Hakim Abdul Jalil Nadvi Degree College, Peshawar	AVP
5.	Mr. Said Wali, Assistant Professor of Urdu (BS- 18).	Govt. College Peshawar	BS Coordinator at Directorate of Higher Education	AVP
6.	Ms. Farrukh Naz, Assistant Professor of English (BS-18)	GGDC Nahaqi, Peshawar	GGDC Chagarmatti, Peshawar	Vice Sr. No.7
7.	Ms. Mussarat Huma, Assistant Professor of Law (BS-18)	GGDC Chagarmatti, Peshawar	GGDC Nahaqi, Peshawar	Vice Sr. No.6
8.	Mr. Zabih Ullah, Lecturer in Islamiyat (BS-17)	Govt. College Peshawar	GDC Naguman, Peshawar	AVP
9.	Mr. Nasir Ali, Lecturer in HPE (BS-17)	GPGC Charsadda	Govt. College Peshawar	Vice Sr. No.8



66610-51-51-0011
 Director's Office
 Higher Education, Khyber Pakhtunkhwa
 Peshawar
 Date: 29/4/23
 No. 96

P. Khan




**HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

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**NOTE FOR MINISTER HIGHER EDUCATION ARCHIVES &
LIBRARIES DEPARTMENT**

SUBJECT: **TRANSFER/POSTING PROPOSAL**

2. The proposal contained in Para-1 of the note is submitted for approval of the Minister for Higher Education Department, in terms of Establishment Department instructions dated 26.07.2013 (F/A), please.


(Dr. Aneela Mahfooz Durrani)
SECRETARY HIGHER EDUCATION

MINISTER FOR HIGHER EDUCATION:

3

Since Gohar Khan


Deputy Director (Establishment) at Serial No 2 is performing his duties in accordance with relevant rules and law and I am satisfied with his performance, therefore, I am not in favour of his transfer. It is also important to add that his tenure is not complete.

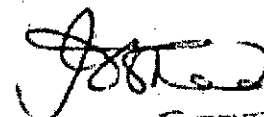
4

Other cases, except at Serial No 2, may be notified, as proposed

Secretary HED

As directed
S/S (Sec-II) HED


3.5.23


3
Minister for Law, Parliamentary Affairs
and Human Right & Higher Education,
Archives and Libraries Department
No. 1, G-10, P.O. Wazirpur



TO BE SUBSTITUTED READING EVEN NO. & DATE

IMMEDIATE

(14)

Anex "D"



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

No.SO(C-II)/HED/2-5/2023/NOC
Dated Peshawar the 08th May, 2023

To

The Election Commission of Pakistan,
Islamabad.

[Handwritten signature]
08/05/23

SUBJECT: NOC FOR POSTING / TRANSFER OF DEPUTY DIRECTORS (BS-18).

Dear Sir,

I am directed to refer to your notification No.F.No.2/(1)/2023-Cord dated 22-01-2023 and to state that the competent authority has approved posting/transfer note of the Deputy Directors (BS-18) (copy enclosed).

In view of the above, prior approval/NOC of the Election Commission of Pakistan is solicited/required for issuance of the said approved notification, please.

Encl: as Above.

[Handwritten signature]
08/05/2023
(ABDUL WALI KHAN)
SECTION OFFICER (COLLEGES-II)

ENDST: NO. & DATE EVEN.

Copy is forwarded to the:-

1. PS to Secretary, Higher Education Department.
2. PS to Special Secretary, Higher Education Department.

[Handwritten signature]
SECTION OFFICER (COLLEGES-II)

08/05/2023

[Handwritten signature]

TO BE SUBSTITUTED BEARING EVEN NO. & DATE

IMMEDIATE



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

No.SO(C-II)/HED/2-5/2023/NOC
Dated Peshawar the 08th May, 2023

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To
The Additional Director General (Elections-I),
Election Commission of Pakistan,
Islamabad.

SUBJECT: **NOC FOR POSTING / TRANSFER OF DEPUTY DIRECTORS (BS-18).**

Dear Sir,

I am directed to refer to your notification No.F.No.10/(1)/2023-Election-II dated 10-03-2023 and to state that the competent authority has approved posting/transfer note of the following Deputy Directors (BS-18):-

S#	Name of Officers	Present Station	Proposed Station
1.	Mr. Imran Khan, Assistant Professor of Urdu (BS-18)	Govt. College Peshawar	Deputy Director (Monitoring) at Directorate of Higher Education
2.	Mr. Sald Wali, Assistant Professor of Urdu (BS-18).	Govt. College Peshawar	BS Coordinator at Directorate of Higher Education

2. In view of the above, prior approval/NOC of the Election Commission of Pakistan is solicited/required for issuance of the said approved notification, please.

Encl: as Above.

Yours faithfully,

(ABDUL WALI KHAN)
SECTION OFFICER (COLLEGES-II)

ENDST: NO. & DATE EVEN.

Copy is forwarded to the:-

1. PS to Secretary, Higher Education Department.
2. PS to Special Secretary, Higher Education Department.

SECTION OFFICER (COLLEGES-II)

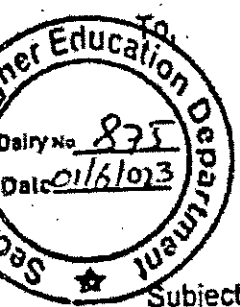
08/05/2023

No. F.10(1)/2023-Elec-II
ELECTION COMMISSION OF PAKISTAN

(16)

Anex "E"

"Secretariat"
Constitution Avenue, G-5/2,
Islamabad, the 31st May, 2023.



Mr. Abdul Wali Khan,
Section Officer (Colleges-II)
Higher Education, Archives & Libraries Department,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: NOC FOR POSTING/TRANSFER OF DEPUTY DIRECTORS (BS-18).

I am directed to refer to your letter No. SO(C-II)/HED/2-5/2023/NOC/393 dated 8th May, 2023 on the subject noted above and to say that the Hon'ble Commission has been pleased to accede your request for the posting/ transfer in respect of following officers: -

S. N	Name of Officers	Present Station	Proposed Station
1.	Mr. Imran Khan, Assistant Professor of Urdu (BS-18)	Govt. College Peshawar	Deputy Director (Monitoring) at Directorate of Higher Education
2.	Mr. Said Wali, Assistant Professor of Urdu (BS-18)	Govt. College Peshawar	BS Coordinator at Directorate of Higher Education

Yours sincerely,

Tauqir Iqbal
(Tauqir Iqbal)

Deputy Director (Election-II)

SoCC-11

[Signature]
1/6/2023

P.O Mr.

[Signature]

1/6/2023

ASST

[Signature]



17

Anex "f"

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

Dated Peshawar the 08th May, 2023

NOTIFICATION

NO.SO(C-II)/HED/2-5/2022/Posting/Transfer: Posting/transfer of the following teaching staff of college cadre in Higher Education Department are hereby ordered, with immediate effect, in the best public interest:-

S#	Name & Designation	From	To	Remarks
1.	Mr. Jamil Ur Rehman, Deputy Director (Monitoring) (BS-18)	Directorate of Higher Education	Assistant Professor of Pak Study (BS-18) at Govt. Hakim Abdul Jalil Nadvi Degree College, Peshawar	AVP
2.	Ms. Farrukh Naz, Assistant Professor of English (BS-18)	GGDC Nahaqi, Peshawar	GGDC Chagarmatti, Peshawar	Vice Sr. No.3
3.	Ms. Mussarat Huma, Assistant Professor of Law (BS-18)	GGDC Chagarmatti, Peshawar	GGDC Nahaqi, Peshawar	Vice Sr. No.2
4.	Mr. Zabih Ullah, Lecturer in Islamiyat (BS-17)	Govt. College Peshawar	GDC Naguman, Peshawar	AVP
5.	Mr. Nasir Ali, Lecturer in HPE (BS-17)	GPGC Charsadda	Govt. College Peshawar	Vice Sr. No.4

-Sd-

SECRETARY

HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN:

Copy of the above is forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Director-IT, HEMIS Cell, Higher Education Department.
4. District Accounts Officers, concerned.
5. All Principals, concerned.
6. PS to Secretary, Higher Education Department.
7. Assistant Professors / Lecturers concerned.
8. Master File.

(ABDUL WALI KHAN)

SECTION OFFICER (COLLEGES-II)

08/05/2023

(18)

Annex "G"
G



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

No. SO (Policy) (E&AD) 274/2023
Dated Peshawar, the 29th May, 2023

To

1. Additional Chief Secretary P&D Department Govt. of Khyber Pakhtunkhwa
2. Senior Member Board of Revenue, Govt. of Khyber Pakhtunkhwa
3. Administrative Secretaries to Govt. of Khyber Pakhtunkhwa
4. All Divisional Commissioners in Khyber Pakhtunkhwa
5. All Heads of Attached Departments in Khyber Pakhtunkhwa
6. All Deputy Commissioners in Khyber Pakhtunkhwa


Subject: -
Dear Sir,

BAN ON POSTINGS AND TRANSFERS IN KHYBER PAKHTUNKHWA

I am directed to refer to the above cited subject and to convey that in view of the fragile fiscal position of the Provincial Government, the Hon'ble Chief Minister Khyber Pakhtunkhwa has been pleased to impose ban on inter-district posting and transfers of officers and officials under the Government of Khyber Pakhtunkhwa as per the following:

- i. There shall be complete ban on inter-district transfers in all the departments;
- ii. ~~There shall be complete ban on transfers within the districts and within the Secretariat and Directorates. However, while proposing such transfers of officers/officials within the district Directorates or the Secretariat, as the case may be, due diligence must be observed and tenure, suitability of the officers/officials for the posts and past performance must be taken into account.~~
- iii. In cases posting and transfer is necessitated due to some court orders or some administrative exigencies, ban relaxation will be obtained from Chief Minister through summary. For such posting/transfers, departments will put forth sound justifications. Subsequently in cases where NOC from Election Commission is required, cases will be taken up with ECP for ban relaxation by the concerned Administrative Departments.
- iv. This ban shall not apply on filling of vacant posts through recommendations of the Khyber Pakhtunkhwa Public Service Commission as Election Commission of Pakistan has already granted exemption in such cases.


Yours sincerely,


(Nasir Bilal),
Deputy Secretary 185/2023

ENDST: NO. & DATE EVEN

Copy is forwarded for information to:

1. Principal Secretary to Governor, Khyber Pakhtunkhwa
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
3. CSO/PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
4. All Additional Secretaries/Deputy Secretaries/Section Officers in Establishment & Administration Department


Section Officer (Policy)

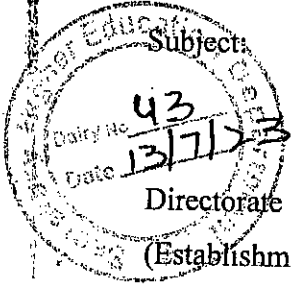


19 Anct "H"



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

NOTE FOR MINISTER HIGHER EDUCATION



POSTING OF DEPUTY DIRECTOR (ESTABLISHMENT) AT
DIRECTORATE OF HIGHER EDUCATION

Higher Education Department manages the affairs of the colleges through Directorate of Higher Education wherein, the incumbent holding the post of Deputy Director (Establishment) has to look after the establishment matters of the colleges of the whole province. As Mr. Gohar Khan presently posted as Deputy Director (Establishment) (BS-18) has completed his tenure of 2 year, therefore required that he may be replaced with a suitable officer.

2. Apropos, the following proposal is submitted for the consideration.

S.NO	Name & Designation of the Officer	From	To	Remarks
1.	Mr. Gohar Khan, Assistant Professor/ Deputy Director (BS-18)	Directorate of Higher Education	As Assistant Professor of Law (BS-18) at Govt. College Peshawar	Vice. S.No. 2
2.	Mr. Fayaz Ahmed, Assistant Professor of History (BS-18)	Govt. College Peshawar	As Deputy Director (Establishment), Directorate of Higher Education	Vice. S.No. 1

3. The proposal contained in Para-2 of the note is submitted for approval of the Minister for Higher Education, in terms of Establishment Department instructions dated 26.07.2013, please.

Aneela Durrani
(Dr. Aneela Mahfooz Durrani)
Secretary Higher Education

13.7.2023

MINISTER FOR HIGHER EDUCATION:

Office of the Ministry for Law, Parliamentary Affairs
and Human Rights & Higher Education, Archives
and Libraries Department, Khyber Pakhtunkhwa

D. No. 243 Date: 14/7/23

Put → DFA K
No c for ECD
85-c
BDIT
So-011
13/7/23
14.7.23

Approved
J.S.W.

14.7.2023
Irfad Gaiser
Minister for Law, Parliamentary Affairs
and Human Rights & Higher Education,
Archives & Libraries Department
Khyber Pakhtunkhwa

AS(c)

24/7/23

IMMEDIATE



(20) Annex "G"
**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

No.SO(C-II)/HED/2-5/2023/NOC / 4016-17
Dated Peshawar the July 14, 2023

To

The Election Commission of Pakistan,
Islamabad.

SUBJECT: **NOC FOR POSTING OF DEPUTY DIRECTOR (ESTABLISHMENT) AT
DIRECTORATE OF HIGHER EDUCATION, KHYBER PAKHTUNKHWA**

Dear Sir,

I am directed to refer to your notification No.F.No.2/(1)/2023-Cord dated 22-01-2023 and to state that the competent authority has approved posting/transfer of the following teaching staff of college cadre:-

S.no	Name & Designation	From	To	Remarks
1.	Mr. Gohar Khan, Assistant Professor/Deputy Director (BS-18)	Directorate of Higher Education	As Assistant Professor of Law (BS-18) at Govt. College Peshawar	Vice Sr.No.2
2.	Mr. Fayaz Ahmad, Assistant Professor of History (BS-18)	Govt. College Peshawar	As Deputy Director (Establishment) Directorate of Higher Education	Vice Sr.No.1

In view of the above, prior approval/NOC of the Election Commission of Pakistan is solicited/required for issuance of the said approved notification, please.

Encl: as Above.

Yours faithfully,

(ABDUL WALI KHAN)
SECTION OFFICER (COLLEGES-II)

ENDST: NO. & DATE EVEN.

Copy is forwarded to the:-

1. Provincial Election Commissioner, Khyber Pakhtunkhwa.
2. PS to Secretary, Higher Education Department.
3. PS to Special Secretary, Higher Education Department.

18/7/23 S/C

SECTION OFFICER (COLLEGES-II)

14/07/2023

No.F.10 (1)/2023-Elec-II
ELECTION COMMISSION OF PAKISTAN

21

Anex" J



Secretariat,
Constitution Avenue, G-5/2,
Islamabad, 20th July, 2023.

To,

✓
Mr. Abdul Wali Khan,
Section Officer (Colleges-II),
Higher Education Archives &
Libraries Department,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - NOC FOR POSTING OF DEPUTY DIRECTOR (ESTABLISHMENT) AT
DIRECTORATE OF HIGHER EDUCATION, KHYBER
PAKHTUNKHWA.

Dear Sir,

I am directed to refer to your letters No. SO(C-II)HED/2-5/2023/NOC/4016-17 dated 14th July, 2023 on the subject cited above and to say that the Hon'ble Commission has already acceded to your request and NOC has been issued vide this office letter dated 31st May, 2023 (copy enclosed). Furthermore, it has been decided by the Hon'ble Commission, "No case should be sent directly by the departments to the Commission, rather should be sent through Establishment or S&GAD departments".

2. In view of the above mentioned directions of the Hon'ble Commission, it is advised that all the cases of transfer / posting and recruitment may be sent through Chief Secretary/ Establishment or S&GAD departments.

Yours' faithfully,

MUKABER

(Mukaber Khan)
Assistant Director (Elections-II)

✓
MUKABER

11/07/2023



(22) Anet "K" 7

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

Dated Peshawar the July 24, 2023

NOTIFICATION

NO.SO(C-II)/HED/2-5/2023/Fayaz Ahmad / 14280-53
Consequent upon approval/NOC of Election Commission of Pakistan vide letter No.F.10(1)/2023-Elec-II dated 20.07.2023, Posting/Transfer of the following Assistant Professors of college cadre are hereby ordered in the best public interest with immediate effect:-

S#	Name/Designation/BPS	From	To	Remarks
1.	Mr. Gohar Khan, Assistant Professor/Deputy Director Establishment (BS-18)	Directorate of Higher Education Khyber Pakhtunkhwa, Peshawar	As Assistant Professor of Law (BS-18), at GC, Peshawar	Vice Sr. No.2
2.	Mr. Fayaz Ahmad, Assistant Professor of History (BS-18)	GC, Peshawar	As Deputy Director (Establishment) Directorate of Higher Education, Khyber Pakhtunkhwa	Vice Sr. No.1

-Sd-
SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN:

Copy is forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Director-IT, HEMIS Cell, Higher Education Department.
4. Principal, Govt. College, Peshawar.
5. PS to Secretary Higher Education Department.
6. Officer concerned.
7. Master File.

d/c SECTION OFFICER (COLLEGES-II)
24/7/23

24/8/23
7

[Signature]



DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA

Rano Garhi, Peshawar

Tel # 091-2650025 / 9330496

E-mail: - dhekpkes@gmail.com

Facebook.com/dhekpkes Twitter.com/dhekpkes

No. 3877 / CA-II / Estt; Branch / Gohar Khan / Law

Dated Peshawar the 25/7

To
SECY HED

File Received on 25/7

Date

Time

The Secretary

Govt; of Khyber Pakhtunkhwa

Higher Education Department, Peshawar.

SUBJECT:

**DEPARTMENTAL APPEAL AGAINST THE PRE-MATURE
TENURE POST TRANSFER ORDER DATED 24.07.2023**

Respected Madam, السلام عليكم

I am directed to refer to the subject cited above and to e
herewith a self-explanatory application submitted by Mr. Gohar Khan, Ex-I
Director (Establishment) of this office for further necessary action, please.

DEPUTY DIRECTOR

To,

The Chief Secretary,
Khyber Pakhtunkhwa,
Peshawar.

Through: Director, Higher Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: **DEPARTMENTAL APPEAL AGAINST THE
PRE-MATURE AND TENURE POST
TRANSFER ORDER DATED 24.07.2023.**


Prayer in Departmental Appeal:

**ON ACCEPTANCE OF THIS APPEAL, THE
PRE-MATURE TRANSFER ORDER DATED
24.07.2023, AGAINST THE TENURE POST (3
YEARS) FOR THE POST OF DEPUTY
DIRECTOR BS-18, ACCORDING TO THE
DIRECTORATE OF HIGHER EDUCATION
DEPARTMENT, MAY PLEASE BE SET
ASIDE AND THE UNDERSIGNED MAY
KINDLY BE ALLOWED TO PERFORM HIS
DUTIES ON THE POST OF DEPUTY
DIRECTOR (ESTABLISHMENT) AT
DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR
UNDER THE RULES.**

Respected Sir,

The undersigned very humbly submits the following
few lines for your kind and sympathetic consideration:

1. That the undersigned is performing his duties as Assistant Professor (BS-18) in the Higher Education Department Khyber Pakhtunkhwa, Peshawar.
2. That the undersigned was transferred from Government Degree College, Wadpagga, Peshawar to the post of Deputy Director (Establishment) Directorate of Higher Education vide transfer order dated 23.07.2022.



DDE

Director	Higher Education
KHYBER PAKHTUNKHWA	
PESHAWAR	
23/07/2023	
Diary # 10325	Page # 346

3. That since my posting as Deputy Director (Establishment), I was performing my duties with great zeal and devotion and to the entire satisfaction of my superiors without any complaint whatsoever regarding my performance till date.
4. That astonishingly, the undersigned has pre maturely been transferred from the post of Deputy Director (Establishment), Directorate of Higher Education to Government College Peshawar as Assistant Professor vide office order dated 23.07.2023.
5. That the impugned order is against the law and policy as the undersigned has been transferred prematurely, the post of Deputy Director (Establishment), Directorate of Higher Education Department is a tenure post for 3 years but the undersigned has been transferred after 1 year and 5 months which is against the rules, policy and tenure post.
6. That the Election Commission of Pakistan imposed ban on all kinds of posting and transfer and if the NOC was issued in the instant case, the same will be for the particular officers.
7. That in this regard the Honorable Chief Minister also issued directives regarding the ban on posting and transfers in Khyber Pakhtunkhwa in which it is clearly mentioned that tenure must be observed (Para-ii); but the transfer order of the undersigned is also against the directives of the Honorable Chief Minister, Khyber Pakhtunkhwa.
8. That in the same order, if posting/transfer is necessitated due to some court orders or **administrative exigencies**, ban relaxation will be obtained from the **Honorable Chief Minister through a proper summary** (Para-iii) which the instant case lacks.
9. That the transfer order is illegal and unlawful, politically motivated, moreover the same is in violation of posting and transfer policy of the Provincial Govt.

It is, therefore, humbly prayed that on acceptance of this appeal the pre-mature transfer order dated 24.07.2023, against the tenure post (3 years) for the post of Deputy Director (BS-18), according to the Directorate



of Higher Education Department, may please be set aside and the undersigned may kindly be allow to perform his duties on the post of Deputy Director (Establishment) at Directorate of Higher Education Khyber Pakhtunkhwa Peshawar under the rules, please.

Yours Obediently,



**Gohar Khan (Deputy Director)
(Establishment),
Directorate of Higher Education,
Khyber Pakhtunkhwa, Peshawar.**

Dated: - 24-07-2023



(27)

Annex "M"

No.F.9 (1)/2023-Elec-II
ELECTION COMMISSION OF PAKISTAN



"Secretariat"
Constitution Avenue, G-5/2,
Islamabad, the 3rd August, 2023.

To,

✓ Section Officer (Colleges-II),
Higher Education Archives & Libraries Department,
Government of Khyber Pakhtunkhwa,
Peshawar.


Subject: **NOC FOR POSTING OF DEPUTY DIRECTOR (ESTABLISHMENT) AT
DIRECTORATE OF HIGHER EDUCATION, KHYBER
PAKHTUNKHWA.**

I am directed to refer to the subject cited above and to convey that the Hon'ble Commission had graciously acceded to your request for transfer/posting in respect of the following officers on 31st May, 2023 as per the detail below:

Sr. No	Name of Officers	From	To
1.	Mr. Fayaz Ahmad, Assistant Professor of History (BS-18)	Govt. College Peshawar	Deputy Director (Establishment) at Directorate of Higher Education
2.	Mr. Gohar Khan, Deputy Director (Establishment) (BS-18)	Directorate of Higher Education	Assistant Professor of Law (BS-18) at GDC Ring Road, Peshawar

2. However, Mr. Gohar Khan, Deputy Director (Establishment) (BS-18) has been transferred to GC Peshawar instead of GDC Ring Road as approved by the Hon'ble Commission. Your Notification No. SO(C-II)/HED/2-5/2023/Fayaz Ahmad dated 24th July, 2023 is contrary to the directions of the Hon'ble Commission conveyed vide letter mentioned above.

3. Therefore, it is directed by the Hon'ble Commission that "decision/NOC of Election Commission of Pakistan must be implemented in letter and spirit."


(Mukaber Khan)
Assistant Director (Election-II)

Put up 8/12

07/08/2023



بعدالت

سروسٹریٹیمونٹل خیر کنوینشن سٹور

کوہر خان بنام حکومت وغیرہ

موزعہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

عبدالرحمن انور

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام سٹور کیلئے فضل شاہ احمد شاہ محمد شاہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جو جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا ادکالت نامہ لکھدیا کہ مندر ہے۔

المرقوم 26
تاریخ 2023

کوہر خان (دعویٰ دائر شدہ) اسٹیشن روٹ

Accepted by کے لئے منظور ہے۔

بمقام سٹور

Fazal Shikr Mohmand

Asc

(15) Rehm