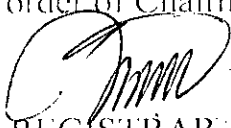


FORM OF ORDER SHEET

Court of _____

Appeal No. 252/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	07/02/2024	<p>The appeal of Mr. Muncer Alam presented today by him. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ . Parcha Peshi is given to 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. 252 / 2024

Muneer Alam, Research Officer, Directorate of Archives & Libraries, Government of Khyber Pakhtunkhwa, Peshawar.

.....Appellant

VERSUS

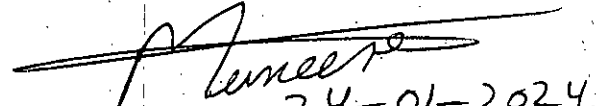
Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives & Libraries Peshawar.

.....Respondent

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Appellant


Muneer Alam,
24-01-2024

Research Officer,
Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

(In person).

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 252 / 2024

Muneer Alam, Research Officer, Directorate of Archives & Libraries, Government of Khyber Pakhtunkhwa, Peshawar.

.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives & Libraries Peshawar.

.....Respondent

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT,
1974.

Respectfully Sheweth,

- 1)- That the appellant is serving as a Research Officer (BPS-17) in the office of the Directorate of Archives and Libraries, Government of Khyber Pakhtunkhwa, Peshawar since November 2007.
- 2)- That the appellant has submitted an application to the concerned office of the Secretary Higher Education Archives & Libraries Department on 07-09-20 23 regarding the issues related to the appellant's job whose meaningful intimation is still awaited. (Copy of the application is attached as annexure-1).
- 3)- That in the application filed by the appellant, the appellant has raised very sensitive issues before high-ups related to the appellant's Job i.e the role of the Higher Education Archives & Libraries Department in mis-handling the affairs of the Directorate of Archives & Libraries, the issue of interference in the appellant's duties, worst condition of the record-rooms of the Administrative Departments, mishandling of the appellant's Seniority by the Higher Education Archives & Libraries Department and in this connection not forwarding the appellant's appeal to the Chief-Secretary Khyber Pakhtunkhwa, in violation of Standing rules the transfer of the appellant from the existing post that is non-transferable to other posts/places, wrongful deduction from the salary of the appellant, the issue of mis-handling the PERs' case of the appellant as well as Reporting of the PERs of the appellant's subordinates by irrelevant bodies other than the appellant, the issue of Training related to the appellant's job, disappearance of the appellant's documents in the Office of the Higher Education Archives & Libraries

Department, the issue of the designated office of the post of Research Officer, stoppage of the official correspondence by the appellant's high-ups in connection to the issues related to the Job of the appellant, disturbance of the job structure of the post of Research Officer, the establish strange practice of joint seniority of different cadres in the Directorate , wrongful appointments, creation of posts and promotions as well as highlighted other irregularities with the following para-wise details.

a) - In the para-1 of the appellant's application it is stated that on 14-07-2008, the appellant had made a written complaint to the Director Archives & Libraries regarding an incident that took place in the Weeding and publication Section of the Directorate of Archives & Libraries, but when confirmed that the Director Archives & Libraries was not going to take any action against the concerned quarter within the Directorate of Archives & Libraries, then due to emergency situation the appellant directly approached to the next higher Authority i.e. the Office of the then Secretary Higher Education, Archives & Libraries (HED). Next day, the then Secretary Higher Education Archives & Libraries Department, personally, visited the Weeding & Publication Section of the Directorate of Archives & Libraries and after few days, the appellant came to know about the transfer of the then Secretary Higher Education Archives & Libraries with no further legal action seemed to be taken against the concerned quarters. After this, one can easily imagine the situation that the appellant was facing at that time within the Directorate. Similarly, on dated 30-05-2009, the appellant had made a written request to the then Secretary Higher Education Archives & Libraries Department regarding the problems of Archives (enclosure "A"). In response, an enquiry was initiated against the appellant without the approval of the appellant's competent authority i.e. Chief Secretary, and the proper Official Visit-Report of the then Section Officer (C-IV Section) of Higher Education Archives & Libraries Department who on the instruction of the then Secretary Higher Education Archives & Libraries Department visited the Directorate of Archives & Libraries, met with the then Director Archives & Libraries and then wrote to the then Secretary Higher Education Archives & Libraries Department that according to the Director Archives & Libraries, everything is ok. After which the Secretary Higher Education Archives & Libraries issued instructions for taking action against the appellant. It is pointed out that the appellant during the official visit of the then Section Officer of C-IV Section Higher Education Archives & Libraries Department, practically, showed and proved before him each and every thing that had been stated by the appellant in the enclosure "A" in which the appellant had raised very basic points like running of sections without any charge responsibilities (handover/takeover activity), running of Periodical Section and Newspaper Section of Archives Wing without any written order and by a Peon respectively, non-availability of Officers of Archives Wing, lack of through proper channel administration etc. If the then Section Officer (C_IV Section) had presented his complete Official Visit-Report before the then Secretary

Higher Education Archives & Libraries Department, then the direction of the enquiry would be surely against others instead of the appellant. It is necessary to highlight that in the enclosure "A", the appellant had also pointed out the performance of the Preservation Section of the Directorate of Archives & Libraries, especially, the lamination of Record which after few months became crystal-clear when the in-charge of the Preservation Section of the Directorate of Archives & Libraries working as Preservation Officer (BPS-16) was caught red-handed by the National Accountability Bureau and then through plea bargaining was exonerated by the National Accountability Bureau. Without the information and approval of the Ex-Director and Ex-Deputy-Director Archives & Libraries etc how a Preservation Officer (BPS-16) could make corruption is a Question mark. Moreover, this Preservation Officer was so close to the high-ups that the Designated Office of the Research Officer of Archives Wing was occupied by him even when he was just a Preservation-Assistant (BPS-11). Many things will be crystal clear if the case is reopened. It is also pertinent to mention that the above mentioned Section-in-charge of Preservation Section was appointed in the Directorate of Archives & Libraries as Preservation-Assistant (BPS-11), but within few years and with the help of the then Director Archives & Libraries and without the consultations of the other officers of the Archives Wing, a new post of the Preservation Officer (BPS -16) was created for him and he got promotion. The above discussed fake and baseless inquiry was a heavy blow to the appellant's career, reputation and moral. Legal Action against those who deliberately mishandled the enclosure "A" may kindly be taken for fixing the responsibilities on the concerned bodies.

b) - In the Para-2 of the appellant's application it is stated that Interference in one's official duty is tantamount to rape and in this regard, the appellant had made a complaint to the appellant's high-ups (enclosure "B1") after which a letter dated December 2nd, 2015 from C-IV Section Higher Education Archives & Libraries Department (enclosure "B2") was served to the Directorate of Archives And Libraries, but still the appellant has no information about the status of the enclosure "B1". Details of the complaint are attached as (annexure "B3"). After the above mentioned complaint, the appellant was directed by the appellant's high-ups to arrange the record of the Litigation Section of the Higher Education Archive & Libraries Department that was in scattered form and due to the non-availability of the record on time for pursuing the case of the Higher Education Archives & Libraries Department in the Law Courts, the salaries of the then two Secretaries of Higher Education Archives & Libraries Department were stopped by the Court at that time. It is pointed out that, at that time, the Officer discussed in the enclosure "B1" was working as Litigation Officer in the Higher Education Archives & Libraries Department, not much sure about his proper official order in this regard. In order to avoid any disciplinary action against the appellant, the appellant did that task on time though it was not related to the

appellant's Job Description. From this, one can easily get to know about an indirect message that was conveyed to the appellant from the appellant's high-ups and the situation that the appellant faced at that time through this task. Similarly, the Scanner of the Weeding and Publication Section of the Directorate of Archives & Libraries, whose administration belongs to the appellant, became disappeared in 2018. The Police not only recovered the Scanner, but also through CCTV camera of the Section caught red-handed the one Officer, who has already been discussed in the enclosure "B1, B2 & B3", and one Official. Both were, later on, released from the Police Station on the assurance of the then Director Archives & Libraries. The Officer was then exonerated by the then Secretary Higher Education Archives & Libraries Department (enclosure "B4") from any disciplinary action with just a warning. In case, he was not caught red-handed, the whole responsibility of the missing of the Scanner would fall upon the appellant's shoulders being the administrator of the Section. Here, it is pointed out that, at that very day when the incident took place, the Officer was appointed by the Office of the Higher Education Archives & Libraries Department against the then vacant post of the Deputy-Director Archives & Libraries on acting-charge-base and had yet neither received the Job Descriptions of the post of the Deputy-Director, nor had taken-over the charge responsibilities being an acting-Deputy-Director in the Directorate of Archives & Libraries. Actions speak louder than words, so one can easily evaluate who was on the target, through and by whom. In this connection, the contents of the application of the Ex-Deputy-Director Archives & Libraries (enclosure "B5") may need your kind attention, if the application is genuine. Moreover, it is the same Officer who, when unpunished time and again, became so bold that after his promotion to the post of the Deputy-Director Archives & Libraries, whose seniority has already been challenged by the appellant with details mentioned in the enclosure "E" and in the Para (d) / Para 4 of the application, prepared a letter (enclosure "B6") with the signatures of the two Research Officers of the Archives Wing against the appellant and the appellant's Job Description. Clause (i) in Para 1 of enclosure "B6" is the clear-cut violations of the Manual of the Secretariat Instructions while in Para 3 of the enclosure "B6", there is baseless statement against the appellant whose clarification on behalf of the appellant is available on the back of enclosure "B6". Even, calling the direct explanations (without the approval of the Director Archives & Libraries from the appellant with irritating words and baseless allegations against the appellant by the same Officer became a routine. Upon proper inquiry by the Government, the appellant will provide the details of other Officers too, who also from time to time have interfered and are still interfering in the official business of the Weeding & Publication Section of the Directorate of Archives & Libraries and the appellant's Job Description.

c) - In the para-3 of the appellant's application it is stated that from time to time, the appellant has always informed the appellant's high-ups about the issues related to the

appellant's Job, like the appellant's Report about the Record, especially, of the Higher Education Archives & Libraries Department to the then Secretary Higher Education Archives & Libraries Department (enclosure "C") whose written intimation is still awaited. This report is enough in highlighting the worse condition of the Record and Record Rooms of the various Government Departments/bodies in the Province, especially, of the Higher Education Department, Finance etc. In this connection, some details are already mentioned in the (enclosure "D") that served as a copy to the PS to the then Secretary Higher Education Department in which the appellant had raised very sensitive points regarding the Directorate of Archives & Libraries, dully marked to the then Section Officer of C-IV Section Higher Education Archives & Libraries Department by the then Additional Secretary Higher Education Archives & Libraries Department, but , unfortunately, not put up by the then Section Officer(C-IV) before the high-ups, due to which one sided decision took place and the appellant got Warning and Counseling in the office of the then Additional Secretary(Dev) Higher Education Archives & Libraries Department on behalf of the then Secretary Higher Education Archives & Libraries Department. Without entertaining enclosure "D", in which the appellant had stated the details in the appellant's defense, legal Status of the above mentioned Warning and Counseling as well as not putting up the enclosure "D" before the high-ups by the then Section Officer (C-IV Section) Higher Education Archives & Libraries Department may need your kind attention. Here, It is necessary to point out that the enclosure "D" after submitting in the Office of the then Secretary Higher Education Archives & Libraries Department, disappeared in the Office of the then Deputy-Secretary Colleges Higher Education Archives & Libraries Department, after which the appellant submitted another copy of the enclosure "D" before the then Additional Secretary (Dev) Higher Education Archives & Libraries Department for onward process.

d) - In the para-4 of the appellant's application it is stated that every year, the Appellant record reservations on the Seniority List i.e. "my reservations are intact and still did not get any intimation of my appeal to the Chief Secretary Khyber Pakhtunkhwa (enclosure "E")". In the enclosure "E", the details about the deliberate disturbance of the appellant's Job Structure are mentioned. In the beginning one post of Research Officer (BPS-17) to be appointed by initial recruitment through Public Service Commission was sanctioned for the Directorate of Archives, then another Specific Post of Research Officer (BPS-17) with Specific Duties that to be appointed by initial recruitment through Public Service Commission was sanctioned for the Directorate of Archives. MA History was made mandatory as a qualification for both the Posts of Research Officers of the Directorate of Archives. After the initial appointments of two Research Officers through Public Service Commission against the above mentioned two Posts, in the Service Rules of the Directorate, 50% quota for the appointment of Research Officers was introduced and later on, MA History qualification criteria was also

removed for the Post of Research Officer that to be filled by promotion. As per the then Service Rules of the Directorate, the senior most among the incumbents of the two Research Officers was made qualified to be promoted to the Post of the Deputy-Director Archives & Libraries. In the recent past, another post of Research Officer (BPS-17) was sanction. It is to be pointed out that one Post among the three Posts of Research Officers is Specific with Specific duties and qualification criteria for appointment while the other two Posts of Research Officers are General Posts. Introduction of 50% quota and placing both Specific and General Posts of Research Officers in the Joint Seniority made very hard the chances of Promotion of the appellant. For example, the present incumbent of the Post of the Deputy-Director Archives & Libraries appointed as an Assistant Research Officer (BPS-16) in the Directorate that got promotion to the post of Research Officer, then promoted to the post of the Deputy-Director Archives & Libraries and now in the near coming months going to be promoted to the post of the Director Archives & Libraries while on the other hand the appellant appointed in the Directorate of Archives & Libraries against the Specific Post of Research Officer (BPS-17) with Specific Duties and qualification criteria for appointment as per existing Service Rules on 07-11-2007 and after serving more than sixteen years got not a single scale promotion. Keeping in mind, the qualification criteria of MA-History for the post of Research Officer that to be filled by promotion was abolished by the Ex-Director Archives & Libraries without consulting the Officers of the Archives wing of the Directorate of Archives & Libraries and without genuine reason that provided much chances of the misuse of authority in future like the Joint Seniority of the Posts of Research Officers and Assistant Directors, both being quite different cadres. The strange stance of the Ex-Director Archives & Libraries in a Court was that MA History qualification criteria for post of Research Officer that to be filled by promotion was abolished on the direction of the Public Service Commission. It is pointed out that upon the retirement of the ex-Deputy-Director Archives & Libraries in April 2018 and due to some deficiencies like PERs etc of the present incumbent of the Post of the Deputy Director Archives & Libraries, the Post of the Deputy-Director Archives & Libraries was occupied by the Officers of other cadres as well as outside the Directorate i.e. one from Library side and other from College side, for more than two years. Here, it is mentioned that according to the then Job Structure of the Directorate of Archives & Libraries, only the senior most Research Officer of the Archives Wing could be promoted and posted against the vacant post of the Deputy-Director Archives & Libraries. So in case of no disturbance in the appellant's Job Structure discussed above and not mishandling the PERs' case of the appellant by the appellant's high-ups, the appellant would be promoted to and posted against the then vacant post of the Deputy Director in April 2018 and then the appellant would be able in challenging under the Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975 as well as on the

basis of the point of Reporting Officer of the Post of Research Officer of Archives Wing, the appointment of a Librarian cadre on the seat of the Director Archives & Libraries which became vacant in March, 2021. Moreover, in the recent past, the Posts of the Assistant Directors (BPS-17), a quite different cadre with quite different qualification and Job Descriptions, were created in the Directorate of Archives & Libraries and were placed at joint Seniority with the Research Officers of Archives Wing without consulting the Officers of the Archives Wing. Here, it is pointed out that both the posts of Research Officer and Assistant Director are two quite different cadres by every aspect from each other both qualification and Job Descriptions wise. Furthermore, Joint Seniority of Assistant-Directors and Research Officers is going to block the promotion chances of the Research Assistant (BPS-12), Assistant Research Officer (BPS-16) and delay much the promotion chances of the Research Officers of the Archives Wing. Similarly, Joint Seniority of the Post of the Deputy-Director (BPS-17) Archives & Libraries and the Chief-Librarian Archives & Libraries (BPS-18), that are two different cadres by all aspects from each other, also adversely affect the Archives. In the enclosure "E" the issue of upgradation of Librarians on the basis of qualification is also highlighted. On the basis of qualifications, the Staff of the Archives Wing like Librarians of the Library Wing was also required to be upgraded with back date benefits as both wings belong to the same Directorate. The appellant has also informed through various correspondences, from time to time, the Officers of the office of the Secretary Higher Education Archives & Libraries Department about not forwarding the appellant's appeal to the Chief-Secretary Khyber Pakhtunkhwa. The issue of forwarding enclosure "E" to the Chief Secretary may need your kind attention.

e) - In the para-5 of the appellant's application it is stated that in response to a letter from C-IV Section Higher Education Archives & Libraries Department (enclosure "F") regarding the notification of the Final/Updated Joint Seniority List of the Posts of the Research Officer of Archives Wing and the newly created Posts of the Assistant Directors, the Director Archives & Libraries issued a letter (enclosure "F2") on 29-06-2019, for submitting written observations on behalf of the appellant within 03 days of the issuance of the enclosure "F2". The appellant submitted his reservations (enclosure "F3") in the Directorate of Archives & Libraries as well as in the CIV Section Higher Education Archives & Libraries Department on 01-08-2019. Moreover, in connection to the disputed seniority list, two meetings were also held i.e. one in the office of the then Additional Secretary (Dev) Higher Education Archives & Libraries Department (enclosure "G1") and other in the office of the then Deputy-Secretary (Litig) Higher Education Archives & Libraries Department (enclosure "G2"), but the appellant received neither any minutes of both the meetings, nor any letter regarding the outcome of the above mentioned two meetings. Legal Status of the Notification of the Final/Updated Joint

Seniority List of the Posts of Research Officers and newly created Posts of Assistant Directors as well as outcome of the enclosures "G1" & "G2" may need to be in your kind attention.

f) - In the para-6 of the appellant's application it is stated that on 10th January, 2014, the appellant's services were placed at the disposal of the Director Higher Education Teacher Training Academy now (HEART) at Govt. Degree College for Boys, phase 6, Hayatabad (enclosure "H") by the Higher Education Archives & Libraries Department. In this connection, the appellant met with the then Secretary Higher Education Archives & Libraries Department who verbally directed the appellant to go there just for few weeks, but it took roundabout 10 months and then after a lot of correspondences, at last, the appellant repatriated to the Directorate of Archives & Libraries with a good performance certificate from the Director Higher Education Teacher Training Academy (HETTA) on the demand of the Higher Education Archives & Libraries Department. If that was a deputation etc, then the appellant never received any deputation allowance or TA/DA, but if that was a punishment, then the appellant has no information about the wrong made by the appellant at that time. The legal status of the enclosure "H" is still not known to the appellant.

g) - In the para-7 of the appellant's application it is stated that on -09-07-2014, in the Office of the Secretary Higher Education Archives & Libraries Department, the appellant submitted an application along with all details and the relevant documents (enclosure "I1") regarding the wrongfully deduction from the appellant's salary. Just a letter to the Administration Department (enclosures "I2") by the Higher Education Archives & Libraries Department was served with no further follow-ups and action taken against those who wrongfully deducted full house-rent for a Bachelor accommodation in the absence of any rules from the appellant's pay. The appellant, personally, followed the case in the Administration Department and got the reply (enclosure "I3") which needs further follow-ups, as the appellant was allotted a Bachelor accommodation i.e. BOQ (Bachelor Officer Quarter) No.4, which is a Suite, not a family Quarter of one or two rooms. It is pointed out that the Administration Department has not yet made any rules regarding deduction of rent for that building in which the appellant resides which can be proved from the letters of the Estate Officer*(enclosure "I4") to the Provincial Building Maintenance Cell. Still full house rent is deducted without any rules from the appellant's pay for a Bachelor Accommodation that needs your kind attention.

h) - In the para-8 of the appellant's application it is stated that the appellant had made an appeal regarding the appellant's PERs (Performance Evaluation Reports) to the then Secretary Higher Education Department on 25-06-2020 (enclosure "J1") whose meaningful intimation is still awaited. The intimation which the appellant got, after approaching to the Right to Information Commissioner, from the CIV Section Higher

Education Archives & Libraries Department (enclosure "J2") dated April 10, 2023 in response to the appellant's application to then Secretary Higher Education Department (enclosure "J3") cannot be the meaningful intimation of the enclosures "J1" and "J3" by any means, as there is nothing in the enclosure "J2" about the rejection of enclosure "J1" as well as complete silence over the many issues raised in "J3". Moreover, enclosure "J2" discusses just the withdrawal order of the then Secretary Higher Education Archives & Libraries Department and change of the appellant's Reporting Channel, but does not disclose the fact that when and by whom the appellant's Reporting Channel has been changed as the appellant has not yet received the Orders of the appellant's Competent Authority i.e. Chief Secretary, regarding the change of the appellant's Reporting Channel. It is pointed out that after the appeal to the Secretary Higher Education Archives & Libraries Department on 25-06-2020 by the appellant in which the appellant requested to the Secretary Higher Education Department that the appellant's Reporting Officer is the Director Archives & Libraries who has not yet forwarded the PERs of the appellant to the Secretary Higher Education Archives & Libraries Department for counter signature. In response to the letter of the Office of the Secretary Higher Education Archives & Libraries Department regarding the above mentioned appeal, the first comments of the Director Archives & Libraries were that the appellant submitted his PERs not on time as well as the appellant had no progress during his entire service career that is why the Ex-Director Archives & Libraries reported and countersigned the PERs of the appellant within the Directorate of Archives & Libraries. One PER for the year 2018 of the appellant was badly reported by the present Director Archives & Libraries who was at that time serving as Chief Librarian Archives & Libraries while the remaining PERs of the appellant were badly reported by the Ex-Deputy-Director Archives & Libraries both being irrelevant as per the Job Descriptions of the appellant and can also be easily proved from the fact that the Job Descriptions of both the Chief-Librarian and the Deputy-Director are quite different from the Job Descriptions of the appellant. It is necessary to highlight that the Ex-Director Archives & Libraries remained the appellant's Reporting Officer since the appellant's appointment w.e.f 2007 up to 2020. During the last year of the tenure of the Ex-Director Archives & Libraries, after submitting an appeal regarding the PERs issue to the Secretary Higher Education Archives & Libraries Department by the appellant on 25-06-2020, the Ex-Director Archives & Libraries badly reported the appellant's PERs by irrelevant quarters within the Directorate and himself countersigned all PERs of the appellant, while on the other hand the appellant's subordinates got promotions without reported their PERs by the appellant. After a lot of correspondences on the PERs' issue of the appellant, at last, the Secretary Higher Education Archives & Libraries issued an Office Order in favour of the appellant but, later on, withdrew his own Office Order. Here, it needs to be scrutinized first the issuance of the Office Order in favour of the appellant and then the

withdrawal Order of his own Office Order by the Secretary Higher Education Archives & Libraries Department that will reveal the whole scenario of the appellant PERs issue. Now, the appellant's high-ups say that the appellant's Reporting Officer is Deputy-Director without the provision of any Order, properly justified, from the appellant's competent Authority i.e Chief Secretary, regarding change of the appellant's Reporting Channel. Deliberately mishandling and delaying of the PERs' case of the appellant seems providing a base for justifying the appointment of a librarian on the seat of the Director Archives & Libraries that will ultimately helpful in justifying the establishment of the Public Libraries, a secular concept, in the Province with their attachment with the Provincial State Archives or Archival library. The details in the enclosures "E" & "O" are worth mentioning in this regard. In the light of the 1973 Constitution of Pakistan as well as Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975 such justification, appointment and attachment with legal action against all those who deliberately delayed and mishandled PERs' Case of the appellant as well as meaningful intimation/status of enclosure "J1" and "J3" may need your kind attention in the best public interest.

i) - In the para-9 of the appellant's application it is stated that from the day one, when the appellant was appointed in the Directorate of Archives & Libraries, the appellant time and again requested for proper training in the field of Archives and was intimated that the appellant's name will be proposed for the training when will be offered. To the appellant's surprise, when the Training for Officers from the National Archives, Islamabad was offered in roundabout 2011, two Assistants (BPS-11), one Peon (BPS-3) and one Mender (BPS-4) were nominated for the training. It is pointed out that this training was only for the Research Officers (BPS-17) of Archives Wing and due to which the issue of Training Completion Certificates to the above mentioned staff of the Directorate of Archives & Libraries arose among the Staff who were imparting the training in the National Archives, Islamabad. Later on, the issue was resolved by writing on a plain paper, by the Staff imparting training, the attendance of the above mentioned staff of the Directorate of Archives & Libraries for TA/DA purpose. The appellant still did not get any nomination for any proper training in the Archives field after serving more than sixteen years as a Research Officer (BPS-17) on the same scale and same post with no promotion since appointment through Public Service Commission due to the deliberately Disturbed Job Structure of the post of the Research Officer and deliberately mishandling of the PERs' case of the appellant for the reason already stated in Para 8.

j) - In the para-10 of the appellant's application it is stated that due to the performance of the Higher Education Archives & Libraries Department discussed above, situation reached to that extent that missing of letters, not forwarding letters to high-ups, missing and return of unsigned documents from the high-ups etc became a

common practice. In this connection, the appellant made just one request to the Secretary Higher Education Archives & Libraries Department on dated 18-07-2023 (enclosure "K1"), along with the copies to the Deputy Secretary (Admin) Higher Education Archives & Libraries Department as well as the Deputy Secretary (Litig.) Higher Education Archives & Libraries Department and, personally, initiated a note-part (enclosure "K2") dated 03-08-2023 which is self-explanatory. One of the two missing copies of the appellant's application, submitted in the Office of the Secretary Higher Education Archives & Libraries Department, recovered from the Directorate of Archives & Libraries while the other copy, submitted in the Office of the Deputy-Secretary (Litig.) Higher Education Archives & Libraries Department, dully marked to the Section Officer (General) Higher Education Archives & Libraries Department is still missing.

k) - In the para-11 of the appellant's application it is stated that the appellant was on leave in the month of March 2023 due to severe Pollen-Allergy problem and then arrived on 14-4-2023 in his Office, but the appellant's Conveyance and Special Allowances remained stopped for ten months. In this regard, the (enclosure "L") is self-explanatory.

l) - In the para-12 of the appellant's application it is stated that violation of the Constitution means treason against the State of Pakistan. The Provincial State Archives is still a Constitutional Institution and the Designated Office of a Research Officer of the Directorate of Archives & Libraries has its own legal status. Since the appellant's appointment, the appellant's Designated Office is occupied by other Staff members of the Directorate of Archives & Libraries and the appellant had requested many times to the high-ups in different times including the Secretary Higher Education Department in this regarding. Instead of the provision of the appellant's Designated Office, now the appellant's high-ups are issuing orders, from time to time, regarding forceful vacation of the appellant's existing office. The self-explanatory enclosure "M1", "M2" & "M3" give the details about the forcefully vacation of the appellant's office by the appellant's high-ups.

m) - In the para-13 of the appellant's application it is stated that the stoppage of Correspondence in a department is like the stoppage of the movement of Blood in a Body. Enclosure "N" is self-explanatory about the refusal of the appellant's application, note-part etc by the Establishment Section of the Directorate of Archives & Libraries.

n) - In the para-14 of the appellant's application it is stated that Archival Library and Public Library are two quite different subjects from every angle. The Archives and the Archival library is a sensitive and serious subject and are required to be entertained for research purpose by research scholars of serious nature as well as by the Government, while the Public Library, a secular concept, is commonly entertained by common public.

Archival Library always remained the part and parcel of the Directorate of Archives since its establishment, but after the attachment of the Subject of the Public Library with the Directorate of Archives, the very name of the Directorate changed from the Directorate of Archives into the Directorate of Archives & Libraries in roundabout 1992. Service rules were framed/changed accordingly and both the then newly created posts of the Deputy-Director (from Archives side) and the Chief Librarian (from Public library side) were placed in a Joint Seniority. Exactly, same like the joint Seniority of the posts of the Research Officers of Archives Wing and the newly created posts of the Assistant-Directors as both the posts of Research Officer and Assistant-Director belong to two quite different cadres. Joint Seniority of two different cadres, Creation of new posts without any proper proposal from the bottom and consultations of the concerned Staff members like in the case of newly created posts of the Assistant Directors or the creation of the new post of the Research Officer of Archives wing in the recent past, up-gradation and framing of service rules without consulting those staff members who are affecting, in violation of standing rules promotion of rankers to initial posts and very much delay in the appointment on the initial posts etc are the established practices since long that need justification. The staff of the Archives cadre of the Directorate of Archives & Libraries have no upgradation while the staff of the Library and ministerial cadres of the Directorate got upgradation, though all cadres serve in the same Directorate, seems against Natural Justice and are extremely harmful from the Administrative point of view that adversely affects the functions of the Provincial Archives, the custodian of the Record of the Province. Here, the appellant would like to draw your kind attention towards another very serious issue of justification of posting of a librarian on the seat of the Director Archives & Libraries in the light of the Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975. In this connection, the appellant had submitted an application to the then Secretary Higher Education Archives & Libraries Department on 06-04-2021 (enclosure "O") with detail description whose written intimation is still awaited, as well as some details are already mentioned in the enclosure "E". Justification of Joint Seniority of different cadres, framing of rules, creation of new posts or upgradation of existing posts without consultation of those staff members who are affecting as well as Justification of Public Library, a secular concept, in a traditional country and in the light of 1973 Constitution of Pakistan the justification of attaching Public Libraries with the Archives or Archival Library and then establishing of Public Library in College like the establishment of the Public Library in the Government Degree College Lakki-Marwat as well as justification of other issues discussed above may need your kind attention on priority basis in the best public interest.

o) - In the para-15 of the appellant's application it is stated that in the light of the Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975

scanning of the Record of the Provincial State Archives by the staff of the 11 Corps, Peshawar and introduction of E-Government in the province without the approval of the Provincial State Archives, being the custodian of the Record of the Province, may need your kind attention. In this connection, appellant's application to the Director Archives & Libraries is enclosed as Annexure ("P").

p) - In the para-16 of the appellant's application it is stated that keeping in view, the above mentioned facts along with the role and nature of the work of the Provincial State Archives in the Government Machinery i.e. inspection of Record-Rooms of the District Governments as well as of the other Departments, selection of Record having Archival Importance from the Record already declared as Obsolete Record by its parent Department from its Non-Current Record, Record preservation and its retrieval to the public as well as Government etc; it is the humble opinion of the appellant, if possible, that a request may be forwarded to the Government with recommendations for bringing the Provincial State Archives under the Direct Control of the Cabinet or Chief-Secretary or, at least, under the Establishment Department. The National State Archives, in Islamabad, also works directly under the Cabinet Division. Unlike the Charity Organizations, Government Departments, especially, a sensitive Department like the Provincial State Archives that is handling the Record is required to deliver services of very serious nature and in order to achieve this end, if possible, on emergency basis necessary recommendations may kindly be forwarded to the Government, like recommendations for the Performance Audit by the office of the Accountant General for a sensitive Department like Provincial State Archives as only through this way one can easily get to know that where and for what purpose the resources of the Government are practically spent or spending. Similarly, recommendations for the abolition of 50% quota for promotion in the Jobs related to the Provincial State Archives as like in the Armed Forces or the Government Departments of the British era may need to be forwarded to the Government. 50% quota is secured on the pretext of giving chances to the employees already working in the Department which makes some sense, but, practically, this concept is not so innocent and is misused that leads to corruption and destruction of Talent. For example, in the beginning, the Directorate of Archives got two seats of the posts of Research Officers to be appointed, initially, by Public Services Commission, but later on, the concept of 50% Quota was introduced on the pretext of giving chances to the existing employees of the Directorate and hence the chapter of violations of standing rules started. PER (ACR), practically, became just a formality and most probably can be misused like discussed in the enclosures "D", "J1" & "J3". Appointment only through Public Service Commission or Departmental Exams may need to be recommended for getting suitable staff for a department that has a very sensitive role in Government Machinery being the Custodian of the Record as well as the rights of the people.

q) - In the para-17 of the appellant's application it is stated that last, but not least, Record means anything that can be produced before the Court of Law as evidence, so authenticity of Record must be ensured. Handling of Record needs much privacy, security and strict observance of standing rules, otherwise, the question of authenticity arises. Under the circumstance stated above, the authenticity of Record may need your kind attention. Keeping in view your precious time, the above-mentioned details are just few examples of the ground realities while there are much that need to be highlighted in the best public interest.

r) - At last of the appellant's application, the appellant has very humbly requested for legal protection for what has been stated above in good faith and if possible, the release of the appellant's Conveyance and Special Allowances highlighted in the enclosure "L", issuing necessary orders regarding the stoppage of deduction of full house rent from the appellant's pay for a Bachelor Accommodation and reimbursement of the amount that is being deducted wrongfully from the appellant's pay since then with details mentioned in the enclosures "I1", "I2" & "I3", meaningful intimation/status of enclosures "B1", "B5", "C", "J1", "J3", "O" & "P", forwarding enclosures "E". It is also requested for taking legal action against those who deliberately mishandled enclosures "A", "J1" & "J3" as well as after the appellant's appeal to the Secretary Higher Education Archives & Libraries Department on 25-06-2020 the justification of the reporting of the appellant's PER for the year 2018 by the present Director Archives & Libraries who at that time was serving as the Chief Librarian Archives & Libraries along with justification of reporting the appellant's PERs by the Ex-Deputy Director Archives & Libraries as both being irrelevant to the appellant's Job Descriptions, involved in the enclosures "B6", "L", "M1", "M2", "M3" & "N", not putting up enclosure "D" before high-ups. It is also requested for the re-examination of enclosure "B4", issuing orders to the concerned quarter in respect of provision of justification of the Legal status of the Notification of the Joint/Updated Seniority List of the Posts of the Research Officers of Archives Wing of the Directorate of Archives & Libraries and the newly created Posts of the Assistant-Directors of the Directorate of Archives & Libraries highlighted in the enclosures "F1", "F2", & "F3" as well as justification of Joint seniority of the post of the Deputy Director Archives & Libraries and the Chief Librarian Archives & Libraries along with the justification of the legal status of enclosure "H" and outcome of enclosures "G1" & "G2". It is further requested for issuing orders to the concerned quarters regarding the justification of the establishment of Public Library, a secular concept that is quite a different thing from every aspects to Archives or Archival Library, its attachment with Archives or Archival Library along with the appointment of a librarian on the seat of the Directorate of Archives & Libraries in the presence of 1973 Constitution of Pakistan, Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975,

respectively, with sympathetic consideration in respect of Para 14, 15, 16 & 17 in the best public interest, please.

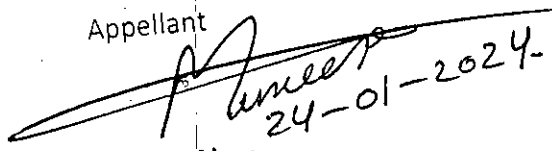
PRAYERS:-

The aforementioned challenges have significantly disrupted the appellant's professional journey and persist as ongoing concerns. It is currently of utmost importance to promptly address the PERs issue, given the appellant's imminent eligibility for the post of the Deputy-Director Archives & Libraries. The incumbent Deputy-Director's impending promotion to the post of the Director of Archives and Libraries in July 2024 adds urgency to the matter. Consequently, it is, therefore, kindly requested for the acceptance of the appellant's appeal that the Secretary Higher Education Department, Khyber Pakhtunkhwa, Peshawar may kindly be approached for meaningful intimation of the annexure-1 for further perusal of those issues among all the above stated issues that come under the preview/jurisdiction of the Tribunal with a particular focus on appellant's PERs issue. Here, it is pointed out that when the post of the Deputy-Director Archives & Libraries became vacant after the retirement of its incumbent in 2018, due to the deficiency of the PERs etc of the present incumbent of the post of the Deputy-Director, the post remained occupied by officers of other cadres for more than two years. Therefore, it is also very humbly requested that in order to avoid the repetition of the above stated delay in promotion to the post of the Deputy-Director, the Higher Education Department may kindly be directed for expedite the preparation of paper work and other arrangements like PSB meeting etc., necessary for the candidate to be promoted to the post of the Deputy-Director Archives & Libraries, before July 2024.

It is, therefore, prayed that the appeal in hand may be accepted and proper order deems fit may be passed in favor of the appellant.

Thanking you in anticipation.

Appellant


Muneer Alam,

Research Officer,

Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

(In person).

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ / 2024

Muneer Alam, Research Officer, Directorate of Archives & Libraries, Government of Khyber Pakhtunkhwa, Peshawar.

.....Appellant

VERSUS

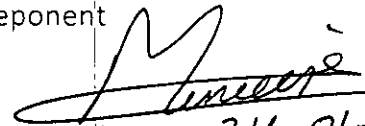
Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives & Libraries Peshawar.

.....Respondent

AFFIDAVIT

I, Muneer Alam s/o Pir dad khan, Research Officer, Directorate of Archives & Libraries, resident of Peshawar 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 Hon'able Tribunal.

Deponent



Muneer Alam,
Research Officer.

24-01-2024

CNIC = 12201-8133746-3
Contact = 0302-3162442.
PTCL = 091-5613533.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ / 2024

Muneer Alam, Research Officer, Directorate of Archives & Libraries, Government of Khyber
Pakhtunkhwa, Peshawar.

.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives &
Libraries Peshawar.

.....Respondent

ADDRESS OF THE PARTY

Petitioner

Muneer Alam, Research Officer, Directorate of Archives & Libraries, Government of Khyber
Pakhtunkhwa, Peshawar.

Respondent

Government of Khyber Pakhtunkhwa through Secretary Higher Education, Archives & Libraries,
Peshawar.

Appellant in person.

Muneer Alam,
Research Officer,
Directorate of Archives and Libraries,
Khyber Pakhtunkhwa, Peshawar.

Muneer Alam
24-01-2024.

Annexure - 1

To

The Honorable Secretary to Government of Khyber Pakhtunkhwa,
Higher Education, Archives & Libraries Department, Peshawar.

Through: Proper Channel.

Subject: Application For The Status Of My Previous Applications That Speaks About The Role Of The HED In Handling The Affairs Of The Provincial State Archives i.e The Custodian Of The Record/Rights Of The People, As Well As Resolving Of Other Issues Related To My Job- THE LAST STAND.

Respected Madam,

With due respect it is stated that on 14-07-2008, I had made a written complaint to the Director A & L regarding an incident that took place in the Weeding and publication Section, but when confirmed that the Director A & L was not going to take any action against the concerned quarter within the Directorate, then due to emergency situation directly approached to the next higher Authority i.e. the Office of the then Secretary Higher Education, Archives & Libraries (HED). Next day, the then Secretary HED, personally, visited the W & P Section of the Directorate and after few days, I came to know that the Secretary was transferred with no further legal action seemed to be taken against the concerned quarters. After this, one can easily imagine the situation I was facing at that time within the Directorate as well as about my surrounding environment. Similarly, on dated 30-05-2009, I made a request to the then Secretary HED regarding the problems of Archives (enclosure "A"). In response, an enquiry was initiated against me without the approval of my competent authority i.e. Chief Secretary, and the proper Official Visit-Report of the then Section Officer (CIV Section) who on the instruction of the then Secretary HED visited the Directorate, met with the then Director A & L and then wrote to the then Secretary HED that according to the Director A & L, everything is ok. It is pointed out that I, practically, showed and proved before him each and every thing that I had stated in the enclosure "A" in which I had raised very basic points like running of sections without any charge responsibilities (handover/takeover activity), running of Periodical Section and Newspaper Section without any written order and by a Peon respectively, non-availability of Officers of Archives Wing, lack of through proper channel administration etc. If the then Section Officer had presented his complete Official Visit-Report before the then Secretary HED, then the direction of the enquiry would be surely against others instead of me. It is necessary to highlight that in the enclosure "A", I had also pointed out the performance of the Preservation Section, especially, the lamination of Record which after few months became Crystal clear when the in-charge of the Preservation Section was caught red-handed by the National Accountability Bureau and then through plea bargaining was exonerated by NAB. Without the information and approval of the Ex-Director, Ex-Deputy-Director etc how a Research- Assistant (BPS 11) could

make corruption is a Question mark. Moreover, this Research Assistant was so close to the high-ups that the Designated Office of a Research Officer of Archives Wing was occupied by him. Many things will be crystal clear if the case is reopened. It is pertinent to mention that the Section-in-charge was appointed in the Directorate as Preservation-Assistant (BPS-11), but later on, with the help of the then Director A & L and without the consultations of the other officers of the Archives Wing, created a new post of the Preservation- Officer (BPS -16) on which he became promoted. This fake and baseless inquiry was a heavy blow to my career, reputation and moral. Legal Action against those who deliberately mishandled the enclosure "A" may kindly be taken for fixing the responsibilities on the concerned bodies.

2. Interference in one's official duty is tantamount to rape and in this regard I had made a complaint to my high-ups (enclosure "B1") after which a letter dated December 2nd, 2015 from C-IV Section (enclosure "B2") was served to the Directorate, but still do not know about the status of my that complaint. Details of the complaint are attached as (annexure "B3"). After the complaint, on the orders of my high-ups, I was directed to arrange the record of the Litigation Section of the HED that was in scattered form and due to the non-availability of the record on time for pursuing the case of the HED before the Law Court, the salaries of the two Secretaries were stopped by the Court at that time. It is pointed out that, at that time, the Officer discussed in the enclosure "B1" was working as Litigation Officer though, not much sure about his proper official order in this regard. In order to avoid the initiation of any disciplinary action against me, I did that task on time though it was not related to my Job Description. From this, one can easily get to know about an indirect message that was conveyed to me from my high-ups and the situation that I faced at that time through this task. Similarly, the Scanner of the Weeding and Publication Section, whose administration belongs to me, became disappeared in 2018. The Police not only recovered the Scanner, but also through CCTV camera of the Section caught red-handed the one Officer, who has already been discussed in the enclosure "B1, B2 & B3", and one Official. Both were, later on, released from the Police Station on the assurance of the then Director A & L. The Officer was exonerated by the then Secretary HED (enclosure "B4"). In case, he was not caught red-handed, the whole responsibility of the missing of the Scanner would fall upon my shoulders being the administrator of the Section. Here, it is pointed out that, at that very day, when the incident took place, he was appointed by the HED against the vacant post of the Deputy-Director on Acting-Charge-Base and had yet neither received the Job Descriptions of the post of the Deputy-Director, nor had taken-over the charge responsibilities being an Acting-Deputy-Director in the Directorate. Actions speak louder than words, so one can easily evaluate who was on the target, through and by whom. In this connection, the contents of the application of the Ex-Deputy-Director (enclosure "B5") may need your kind attention, if the application is genuine. Moreover, it is the same Officer who, when unpunished

time and again, became so bold that after his promotion to the post of the Deputy-Director, whose seniority I have already challenged with details mentioned in the enclosure ("E"), prepared a letter (enclosure "B6") with the signatures of the two Research Officers of the Archives Wing against me and my Job Description. Clause (i) in Para 1 of enclosure "B6" is the clear-cut violations of the Manual of the Secretariat Instructions while in Para 3 of the enclosure "B6", there is baseless statement against me whose clarification on behalf of me is available on the back of enclosure "B6". Even, calling the direct explanations with irritating words and baseless allegations against me by the same Officer became a routine. Upon proper inquiry by the Government, I will provide the details of other Officers too, who also from time to time have interfered and are still interfering in the official business of the Weeding & Publication Section and my Job Description. It is pointed out that after the retirement of the ex-Deputy-Director in 2018, from other cadres i.e. one from college side and other from Library side, were posted against the vacant post of the Deputy Director A & L. Here, it is mentioned that according to the Job Structure of the Directorate, only the senior most Research Officer of the Archives Wing can be promoted and posted against the vacant post of the Deputy-Director. In case of no disturbance in my Job Structure whose details is mentioned in the enclosure "E" and not mishandling of my PERs' case by my high-ups, I would be promoted to and appointed against the then vacant post of the Deputy Director in 2018 and then would be able in challenging under the Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975 the appointment of a Librarian cadre on the seat of the Director A & L which became vacant in March, 2021.

3. From time to time, I have always informed my high-ups about the issues related to my Job, like my Report about the Record, especially, of the HED to the then Secretary HED (enclosure "C") whose written intimation is still awaited. This report is enough in highlighting the worse condition of the Record and Record Rooms of the various Government Departments/bodies in the Province, especially, of the HED, Finance etc. Still did not get the written intimation of enclosure "C". In this connection, some details are already mentioned in the enclosure "D" served as a copy to the PS to the then Secretary HED in which I have raised very sensitive points regarding the Directorate, dully marked to the then Section Officer of C-IV Section by the then Additional Secretary HED, but , unfortunately, not put up by the then Section Officer before the high-ups, due to which one sided decision took place and I got Warning and Counseling in the office of the then Additional Secretary(Dev) HED on behalf of the then Secretary HED. Without entertaining enclosure "D", in which I had stated the details in my defense, legal Status of the above mentioned Warning and Counseling as well as not putting up the letter before the high-ups by the then Section Officer may need your kind attention. Here, It is necessary to point out that the enclosure "D" after submitting in the Office of the then Secretary HED, disappeared in

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the Office of the then Deputy-Secretary Collèges; after which I submitted another copy of enclosure "D" before the then Additional Secretary (Dev) HED for onward process.

Every year, I record my reservations on the Seniority List i.e. "my reservations are intact and did not get any intimation in response to my appeal to the Chief Secretary (enclosure "E") regarding the deliberately disturbance of my Job Structure, as still the enclosure "E" has not been forwarded. I through various correspondences, from time to time, have informed the Officers of the HED. Forwarding enclosure "E" to the Chief Secretary may need your kind attention.

5. In response to a letter from C-IV Section (enclosure "F") regarding the notification of the Final/Updated Joint Seniority List of the Post of the Research Officer of Archives Wing and the newly created Post of the Assistant Director, the Director A & L issued a letter (enclosure "F2") on 29-06-2019, for submitting written observations on behalf of me within 03 days of the issuance of the enclosure "F2". I submitted my reservations (enclosure "F3") in the Directorate as well as in the CIV Section on 01-08-2019. Moreover, in connection to the disputed seniority list, two meetings were also held i.e. one in the office of the then Additional Secretary (Dev) HED (enclosure "G1") and other in the office of the then Deputy-Secretary (Litig) HED (enclosure "G2"), but neither received the minutes of both the meetings, nor received any letter regarding the outcome of the above mentioned two meetings. Legal Status of the Notification of the Final/Updated Seniority List of the Post of Research Officer and newly created Post of Assistant Director as well as outcome of the enclosures "G1" & "G2" may need to be in your kind attention.

6. On 10th January, 2014, my services were placed at the disposal of the Director (HETTA) now (HEART) at Govt. Degree College for Boys, phase 6, Hayatabad (enclosure "H") by the HED. In this connection, I met with the then Secretary HED and she verbally directed me to go there just for few weeks; but it took roundabout 10 months and then after a lot of correspondences, at last, repatriated to the Directorate of A & L with a good performance certificate from the Director HETTA on the demand of the HED. If it was a deputation etc, then never received any deputation allowance or TA/DA and if it was a punishment, then I have no information about the wrong I did at that time. Still do not know the legal status of the enclosure "H".

7. On -09-07-2014, in the Office of the Secretary HED, I submitted an application along with all details and the relevant documents (enclosure "I1") regarding the wrongfully deduction from my salary. Just a letter to the Administration Department (enclosures "I2") by the HED was served with no further follow-up and action taken against those who wrongfully deducted full-house-rent for a Bachelor accommodation, in the absence of any rules, from my pay. I, personally, followed my case in the Administration department and got the reply (enclosure "I3") which needs further follow-ups, as I was allotted a Bachelor accommodation i.e. BOQ No.4, which is

a Suite, not a family Quarter of one or two rooms. It is pointed out that the Administration Department has not yet made any rules regarding deduction of rent for that building in which I reside which can be proved from the letters of the Estate Office (enclosure "I4") to the PBMC. Still full house rent is deducted without any rules from my pay for a Bachelor Accommodation.

8. I made an appeal regarding my PER (Performance Evaluation Report) to the then Secretary HED on 25-06-2020 (enclosure "J1") whose meaningful intimation (written) is still awaited. The intimation which I got, after approaching to RTI, from the CIV Section (enclosure "J2") dated April 10, 2023 in response to my application to the Secretary HED (enclosure "J3") cannot be the meaningful intimation of enclosures "J1" and "J3" by any means, as there is nothing in the enclosure "J2" about the rejection of enclosure "J1" as well as complete silence over the many issues raised in "J3". Moreover, enclosure "J2" discusses just the withdrawal order of the then Secretary HED and change of my Reporting Channel, but does not disclose the fact that when and by whom my Reporting Channel has been changed as I have not yet received the Orders of my Competent Authority i.e. Chief Secretary, and Appointing Authority regarding the change of my Reporting Channel. It is necessary to highlight that the Ex-Director Archives & Libraries remained my Reporting Officer since my appointment w.e.f 2007 up to 2021 and during the last year of his tenure, he badly reported my PERs through irrelevant quarters within the Directorate and himself countersigned all my PERs, while on the other hand my subordinates got promotions without reported their PERs by me. It is pointed out that the PER of one year was reported by the present Director A & L who was at that time serving as Chief Librarian, not relevant to my Job. Now, after my appeal, my high-ups say that my Reporting Officer is Deputy-Director without the provision of any Order, properly justified, from my competent Authority i.e Chief Secretary, regarding change of my Reporting Channel. Deliberately mishandling and delaying of my PERs' case seems providing a base for justifying the appointment of a librarian on the seat of the Director Archives & Libraries that will ultimately helpful in justifying the establishment of the Public Libraries in the Province with its attachment with the Provincial State Archives or Archival library as well as College Libraries. The details in the enclosures "E" & "O" are worth mentioning in this regard. In the light of the 1973 Constitution of Pakistan as well as Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975 such justification, appointment and attachment with legal action against all those who deliberately delayed and mishandled my PERs' Case as well as meaningful (written) intimation/status of enclosure "J1" and "J3" may need your kind attention in the best public interest.
9. From the day one, when I was appointed in this Department, I time and again requested for my proper training in the field of Archives and was intimated that my name will be proposed for the

training when will be offered. To my surprise, when the Training for Officers from the National Archives, Islamabad was offered in roundabout 2011, two Assistants (BPS-11), one Peon (BPS-3) and one Mender (BPS-4) were nominated for the training. It is pointed out that this training was only for the Research Officers (BPS-17) of Archives Wing and due to which the issue of Training Completion Certificates to the above mentioned arose among the Staff who were imparting the training in the National Archives, Islamabad which was, later on, resolved by writing on a plain paper by the Staff, imparting training, the attendance of the above mentioned for TA/DA purpose. Still did not get nomination for any proper training in the Archives field after serving roundabout sixteen years as a Research Officer on the same scale and same post with no promotion since appointment through Public Service Commission due to the deliberately Disturbed Job Structure of the post of the Research Officer and deliberately mishandling of my PERS' case for the reason already stated in Para 8.

10. Due to the performance of the HED discussed above, situation reached to that extent that missing of letters, not forwarding letters to high-ups, missing and return of unsigned documents from the high-ups etc. became a common practice. In this connection, I made just one request to the Secretary HED on dated 18-07-2023 (enclosure "K1"), along with the copies to the Deputy Secretary (Admin) as well as the Deputy Secretary (Litg) and, personally, initiated a note-part (enclosure "K2") dated 03-08-2023 which is self-explanatory. One of the two missing copies of my application, submitted in the Office of the Secretary HED, recovered from the Directorate while the other copy, submitted in the Office of the Deputy-Secretary (Litg) HED, dully marked to the Section Officer (General) is still missing.
11. I was on leave in the month of March 2023 due to severe Pollen-Allergy problem and then arrived on 14-4-2023 in the Office, but my Conveyance Allowance and Special Allowance are still stopped since then. In this regard, the enclosure "L" is self-explanatory. After the wrongful deduction of my House Rent, now became the turn of the stoppage of my Special Allowance and Conveyance Allowance and if this practice was not discourage on time, seems to me the stoppage of my remaining salary in the near future like the stoppage of my promotion etc.
12. Violation of Constitution means treason against the State of Pakistan. The Provincial State Archives is still a Constitutional Institution and the Designated Office of an Officer has its own legal status. Since my appointment, my Designated Office is occupied by others and I had requested to my high-ups in different times including to the Secretary HED in this regarding. Instead of the provision of my own Designated Office, now my high-ups are issuing orders, from time to time, regarding forceful vacation of my existing office. The enclosures "M1", "M2" & "M3" in which the details about the forcefully vacation of my office by my high-ups are self explanatory.

13. The stoppage of Correspondence in a department is like the stoppage of the movement of Blood in a Body. Enclosure "N" in which the details about the refusal of the Establishment Section of my application, note-part etc is self-explanatory.

14. Archival Library and Public Library are two quite different subjects from every angle. The Archives and the Archival library is a sensitive and serious subject and are required to be entertained for research purpose by research scholars of serious nature as well as by the Government, while the Public Library, a secular concept, is commonly entertained by common public. Archival Library always remained the part and parcel of the Directorate of Archives since its establishment, but after the attachment of the Subject of the Public Library with the Directorate of Archives, the very name of the Directorate changed from the Directorate of Archives into the Directorate of Archives & Libraries in roundabout 1992. Service rules were framed/changed accordingly and both the then newly created posts of the Deputy-Director (from Archives side) and the Chief Librarian were placed in a Joint Seniority. Exactly, same like the joint Seniority of the post of Research Officer of Archives Wing and the newly created post of the Assistant-Director as both the posts belong to two quite different cadres. Joint Seniority of two different cadres, Creation of new posts without any proper proposal from the bottom and consultations of the concerned Staff members like in the case of newly created posts of the Assistant Directors or the creation of the new post of the Research Officer of Archives wing in the recent past, Up gradation and Framing of service rules without consulting those staff members who are affecting, promotion of rankers to initial posts and in violation of standing rules very much delay in the appointment on the initial posts etc are the established practices since long that need justification as are extremely harmful from the Administrative point of view. Here, I would like to draw your kind attention towards another very serious issue like justification of posting of a librarian on the seat of the Director A & L in the light of the Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975. In this connection, I had submitted an application to the then Secretary HED on 06-04-2021 (enclosure "O") with detail description whose written intimation is still awaited, as well as some details are mentioned in the enclosure "E". Justification of Joint Seniority of different cadres, framing of rules, creation of new post or upgradation of existing post without consultation of those who are affecting as well as Justification of Public Library, a secular concept, in a traditional country with the presence of 1973 Constitution of Pakistan, justification of attaching Public Libraries with the Archives or Archival Library and then establishing of Public Library in College like the Public Library in the Government Degree College Lakki-Marwat as well as justification of other issues discussed above may need your kind attention on priority basis in the best public interest.

In the light of the Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975 scanning of Record of the Provincial State Archives by the staff of the 11 Corps, Peshawar and introduction of E-Government in the province without the approval of the Provincial State Archives may need your kind attention. In this connection, my application to the Director Archives & Libraries is enclosed as Annexure ("P").

Keeping in view, the above mentioned facts along with the role and nature of the work of the Provincial State Archives in the Government Machinery i.e. inspection of Record-Rooms of District Governments as well as of other Departments, selection of Record having Archival Importance from the Record already declared as Obsolete Record by its parent Department from its Non-Current Record, Record preservation and its retrieval to the public as well as Government etc, it is my humble opinion, if possible, that a request may be forwarded to the Government with recommendations for bringing the Provincial State Archives under the Direct Control of the Cabinet or Chief-Secretary or, at least, under the Establishment Department. The National State Archives, in Islamabad, also works directly under the Cabinet Division. Unlike the Charity Organizations, Government Departments, especially, a sensitive Department like the Provincial State Archives that is handling the Record is required to deliver just services of very serious nature and in order to achieve this end, if possible, on emergency basis necessary recommendations may kindly be forwarded to the Government, like recommendations for the Performance Audit by the office of the Accountant General for a sensitive Department like Provincial State Archives, as only through this why one can easily get to know that where and for what purpose the resources of the Government are practically spent or spending. Similarly, recommendations for the abolition of 50% quota for promotion in the Jobs related to the Provincial State Archives as like in Armed Forces or the Government Departments of the British era may need to be forwarded to the Government. 50% quota is secured on the pretext of giving chances to the employees already working in the Department which makes some sense, but, practically, this concept is not so innocent and is misused that leads to corruption and destruction of Talent. For example, in the beginning, the Directorate of Archives got two seats of the posts of Research Officers to be appointed, initially, by Public Services Commission, but later on, the concept of 50% Quota was introduced on the pretext of giving chances to the existing employees of the Directorate and hence the chapter of violations of standing rules started. PER (ACR), practically, became just a formality and most probably can be misused like discussed in the enclosures "D", "J1" & "J3". Appointment only through Public Service Commission or Departmental Exams may need to be recommended for getting suitable staff for a Department that has a very sensitive role in Government Machinery being the Custodian of the Record/ rights of the people.

17. Last, but not least, Record means anything that can be produced before the Court of Law as evidence, so authenticity of Record must be ensured. Handling of Record needs much privacy, security and strict observance of standing rules, otherwise, the question of authenticity arises. Under the circumstance stated above, the authenticity of Record may need your kind attention. Keeping in view your precious time, the above mentioned details are just few examples of the ground realities while there are much that need to be highlighted in the best public interest.

Anything stated above, though in good faith, may need legal protection.

You are, therefore, very humbly requested for, if possible, the release of my Conveyance Allowance and Special Allowance highlighted in the enclosure "L", issuing necessary orders regarding the stoppage of deduction of full house rent from my pay for a Bachelor Accommodation and reimbursement of the amount that is being deducted wrongfully from my pay since then with details mentioned in the enclosures "I1", "I2" & "I3", meaningful (written) intimation/status of enclosures "B1", "B5", "C", "J1", "J3", "O" & "P", forwarding enclosures "E". It is also requested for taking legal action against those who deliberately mishandled enclosures "A", "J1" & "J3" as well as justification of reporting my PER, after my appeal to the Secretary HED, of the year 2018 by the present Director A & L who at time was serving as Chief Librarian along with justification of reporting my PERs by ex-Deputy Director both being irrelevant to my Job Descriptions, involved in the enclosures "B6", "L", "M1", "M2", "M3" & "N", not put up enclosure "D" before high-ups. It is also requested for the re-examination of enclosure "B4", issuing orders to the concerned quarter in respect of provision of justification of the Legal status of the Notification of the Joint/Updated Seniority List of the Post of the Research Officer of Archives Wing and the newly created Post of the Assistant-Director highlighted in the enclosures "F1", "F2" & "F3" as well as justification of Joint seniority of the post of the Deputy Director and the Chief Librarian along with the justification of the legal status of enclosure "H" and outcome of enclosures "G1" & "G2". It is further requested for issuing orders to the concerned quarters regarding provision of justification of the establishment of Public Library, a secular concept that is quite a different thing from every angle

in respect to Archives or Archival Library, and its attachment with Archives or Archival Library along with the provision of justification of the appointment of a librarian on the seat of the Directorate of A & L in the presence of 1973 Constitution of Pakistan and Archival Act, 1993 and Archival Material (Preservation and Export Control) Act, 1975, respectively, with sympathetic consideration in respect of Para 14, 15, 16 & 17 in the best public interest, please.

Thanking you in anticipation.

Yours Sincerely,

Muneer Alam
(Muneer Alam) 05-09-2023

Research Officer,
Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

Copy in advance for help to:-

The Honorable Secretary Higher Education, Archives and Libraries, Department

Muneer Alam
Research Officer, 05-09-2023

Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

179
Recd along with annexes
07/09/22
D. Akbar

Diary No. 179
Safety Off.

Annexure ^(k) **A**
Annexure "A"

Am/ 1
Ref No 47
30-02-09

Total pages five.

Page no. 1

To: The Secretary to Government of NWFP,
Higher Education, Archives & Libraries Department,
Peshawar.

Through: Proper Channel.

Subject: Problems of Archives.

R/Sir,

With due respect it is stated that I was appointed as a Research Officer in the Directorate of Archives & Libraries, Govt. of NWFP, Peshawar on 03-11-2007 and I submitted my Arrival Report on 07-11-2007. I time and again requested for my proper training in the field of Archives but such request was not entertained. Though the post of a Research Officer, who is the custodian of the precious Record is a very sensitive post and requires professional techniques.]

Sir, I have tried my best to solve the various problems of Archives with in the Directorate but it seems to me that without the interference of your honorable authority, it is not possible to solve the intricate and sensitive problems of Archives.

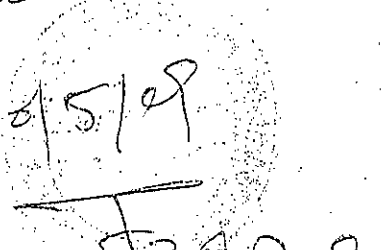
Sir, according to my observation, Archives is going from bad to worse and it requires your immediate attention, otherwise our precious record which is in the shape of Newspapers, Magazines, Classified Files, Treaties, Pictures, Books, etc, will be permanently damaged or lost.

The main problems of Archives are the following.

- 1- Establishment Section: - It is the back bone of the Directorate and if it is not working properly then its effects will be seen everywhere in the Directorate. For checking the progress and efficiency of this section my Service Card, TA/DA bill submitted in January, 2008 and Medical bill submitted in August, 2008 will show you the whole picture.

No: Page.

I have send me
copy on 30/5/09



2- Attendance Register: - upon further enquiry it will be cleared whether maintained as per rule or-----?

3- Centrally Air-conditioned Facility: - The original plan was that the Directorate will be centrally Air-conditioned in order to provide Archival friendly environment for the preservation of the record but after spending a heavy amount of money this facility is not available for the record. Upon further enquiry every thing will be clear before you.

Moreover, those air-conditions which are used in the Directorate should be checked that whether these are for the staff members or for the precious record. Further more, their present condition will show you that whether these air-conditions are maintained properly or not, i.e., whether these air-conditions are cleaned scientifically or not. And also who is responsible for this.

4- Office of the Research Officer: - upon further enquiry the whole picture will be clear.

5- Rules for the Archives: - In the past some rules were framed for the whole Directorate in which duties of each officers from BPS.16 and above were specified. Enquiry should be made whether these rules are followed or not. Moreover, the circumstances have changed to a great extent and many changes occurred during the last few years. So if possible rules should be revised in order to meet the latest requirements of the Directorate.

6- Staff Position of the Archives: - As per Archival rule there are two posts of Research Officers and two posts of Assistant Research Officers i.e. RO-1 & ARO-1 similarly RO-2 & ARO-2.

During the last one and a half year only one RO i.e. RO-2 is available to provide services for the Archives while RO-1 is on deputation out side the Directorate for about three years and ARO-1 is engaged in some work assigned by the Deputy Director Archives & Libraries since 2005 as per his written description. Similarly ARO-2, who after appointment rendered hardly six months services and then got two years leave without pay. After the expiry of his two years leave with out pay, he ^{is} ~~was~~

Next Page.

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absent for about two years and no action was taken against him. When I appointed as a Research Officer, I strongly demanded for the provision of ARO-2 and after one and a half year of my service, there is no sign of ARO-2. Upon further enquiry every thing will be clear.

Similarly, there are different sections of the Archives and each section should have complete and qualified staff, to handle the record, otherwise the record will be damaged if handled by peons.

Moreover, the main purpose of Archives is to preserve and maintain the record and to provide the required record to the people and the government and this purpose is attained only in the presence of complete and qualified staff.

7- Lack of Through Proper Channel Administration: - Archives is suffering much due to lack of through proper channel Administration. Upon further enquiry every thing will be clear.

8- Charge Responsibility of the Archives: - I have not yet taken the charge of the Archives and performing my duties as per the orders of the Director Archives & Libraries.

The charge responsibility is possible only in the presence of complete, qualified and reliable staff.

9- Posting without written orders: - Posting of staff members are made verbally. *Transfer*

10- Equipments/ Machines and Electrical devices for the Archives: - There are many electrical equipments, machines and devices i.e. cameras, scanners, computers, printers, vacuum cleaners etc, were bought for the Archival Purposes. Upon further enquiry you will know that whether these are used for Archival purposes or not, what is their quality and what are their present condition as well as progress because a lot of money has been spent on their purchase.

Next Page.

Report

1- Lamination of the Record: The purpose of Archives is attained only when the record in bad condition is ^{Repaired} laminated regularly. Upon further enquiry you will know that how much record is laminated during the last few years.

The position of those sections of the Archives which are working under my supervision is as under:

- 1- Newspaper Section: - This section was run by only one person, who is a peon named Mr. Jan Nisar for more than a year. Further enquiry will reveal the whole story.
- 2- Magazine Section: - upon further enquiry one will know that how this was run and what is its present position.
- 3- Record and Research Section: - In this section classified files are kept. Further enquiry will reveal the whole truth.
- 4- Microfilming Section: Further enquiry will show you the whole position.
- 5- Weeding Section: - Upon further enquiry you will know the whole truth.
- 6- Publication Section: - Every thing will be clear upon further enquiry.

The very serious problem in Archives is that whether the record of the different Sections of Archives are issue able or not to the outsiders as well as the staff members. It should also be cleared that whether the record of the Archives is allowed to be read in other sections/ Branch of the Directorate or not. Necessary orders are required in this regard by your honorable authority because we are suffering much from this confusion.

Also Archives is running without any charge responsibility for so many years. Enquiry is needed that why and who is responsible for this because it is clear that without responsibility no work is done properly.

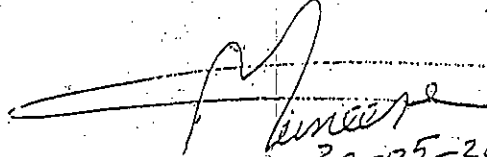
Your honorable authority is requested for immediate attention towards the Directorate of Archives & Libraries, NWFP, Peshawar as soon as possible.

Next Page.

I shall be very thankful to you for this act of kindness.

Dated 27-05-2009.

Yours Sincerely,


30-05-2009.

Muneer Alam,
Research Officer,
Directorate of Archive & Libraries,
Government of NWFP, Peshawar.

Copy in advance to the Secretary Higher Education, Archives & Libraries, Government of NWFP, Peshawar.

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To
The Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawa.

Subject. HIGHLIGHTING THE MAIN ISSUES OF THE WEEDING SECTION

Respected Sir,

With due respect it is stated that I would like to draw your kind attention towards the following main issues of the weeding section.

1. INTERFERENCE IN MY DUTIES BY THE RESEARCH OFFICER-I(MR. MUQARRAB KHAN).

On Friday i.e. 28th August, 2015, about 2.00 p.m, under the supervision of Mr. Muqarrab Khan, some bags were entered through the windows of the weeding section, without any written orders of the Director, Archives and Libraries. He informed me that this is the verbal order of the Director, Archives and Libraries.

2. FILE(10/40) OF THE WEEDING SECTION.

10/40 file is maintained for the official activities of the Section. The latest available file which Saeed Khan, the Section Incharge, showed me was from 1998 to 2004, after 2004 onwards, 10/40 file was not available with him. When I checked the available file, there were no note-part pages attached with the file.

Sir, it seems to me that the note-part pages with a file are very necessary and it is through the note-part pages that one can know how the section is going on. Every activity of the section is written, para-wise, in those note-part pages. I also have the opinion, if you agree that the file(10/40) of the Section may be with the Section Incharge.

Report is hereby submitted for your perusal, please.

Thanking you in anticipation.

Yours Sincerely,

Muneer Alam, Research Officer II,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawa.

Copy forwarded to the honourable Secretary, Higher Education, Archives & Libraries Department, Khyber Pakhtunkhwa.

Muneer Alam
Research Officer-II,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawa

*Received
11-09-2015*

Annexure "B" B₂ 337/

1st Reminder



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

No. SO(C-IV)HE/1-6/2011/Miscellaneous
Dated Peshawar the, December 2nd, 2015

To

The Director Archives and Libraries,
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: HIGHLIGHTING THE MAIN ISSUES OF THE WEEDING SECTION.

I am directed to refer to this department letter No. SO(C-IV)HE/1-6/2011/Miscellaneous/1358 dated September 2nd, 2015 on the subject noted above and to state that the requisite reply is still awaited from your end which may please be furnished at the earliest.

Encl: as above

(SHAH SAUD)
SECTION OFFICER (C-IV)

To

The Director,
Directorate of Archives & Libraries, Peshawar.

Subject:- ENTRY OF THE RECORD INTO THE WEEDING SECTION IN VIOLATION OF THE EXISTING RULES I.E. THE RECORD HAVING NO COVERING LETTER OF ITS PARENT DEPARTMENT/WITHOUT WRITTEN ORDERS OF THE DIRECTOR ARCHIVES & LIBRARIES/WITHOUT HANDING/TAKING OVER ACTIVITY.

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Respected Sir,

With due respect it is stated that reference your letter No.. 2013/3/10/DA dated 18-09-2015, I would like to present before you the exact picture regarding the record of the Finance department and defend myself.

*23/9
C*

02- Sir, what I have done in this case is to save my skin as well as for the welfare of the record. As you know, that many complaints were published in newspapers as well as reached to the Chief Minister and to the secretary, Higher Education, Archives & Libraries department from time to time regarding selling of the record by the staff of archives in the recent past. I have never sold any record nor received any money as disposal of waste paper (selling/destruction of record) is the job of Govt. Printing Press.

03- As per my job description dated 13-05-2015 vide No. 1121/1/91/DA, it was my duty to inspect district record offices for selection and transfer of obsolete record (categorized as D, due for destruction by its parent department) to provincial archives for permanent preservation along with other responsibilities. Sir, Official business is run through some prescribed rules and regulation as far as my duty is concerned regarding the selection and transfer of obsolete record (having archival importance) from other departments, under the existing rules, an official letter is served either from us or from the department whose record is to be transferred to the provincial archives for permanent preservation and the Director, Archives & Libraries mark that letter to the concerned officer for needful. Then the officer, after selecting record having archival importance from the obsolete record, shift the record to archives with great care for permanent preservation after proper handing/taking activity on the spot with its parent department, while the remaining obsolete record is left to its parent department for destruction through Govt. Printing Press.

04- Sir, if my above description is right then it seems to me that the record entered into the weeding section before 13-05-2015 and on 28-08-2015 at about 3:00 p.m. is clear violation of the existing rules which is tantamount to the extermination of the importance and need of archives. Copy of the detail is enclosed as annexure-A. Though during emergency flood, fire, earthquake etc, we can go to whatever extent but in

05- In light of the above stated facts, it is requested that the notice regarding insertion of adverse remarks as mentioned in the above referred letter may kindly be reconsidered/withdrawn please.

Thanking you in anticipation.

Yours sincerely,

Dated.

Muneez
21-09-15

Muneez
21-09-2015

Muneez Alam
Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Copy forwarded to the Secretary, Higher Education, Archives & Libraries Department as I have been directed to start categorization of the said record.

Muneez Alam
Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar

Reviewed on
21-09-2015 at 12:45 pm.
Muneez
21-09-2015

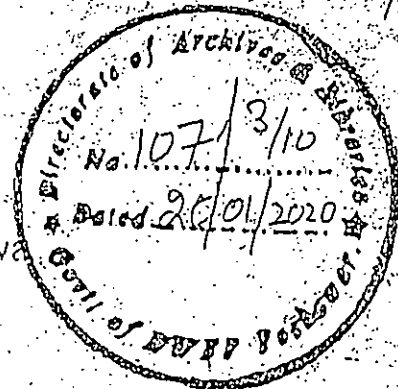


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GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION ARCHIVES AND
LIBRARIES DEPARTMENT

No. SO(C-IV) HED/2-7/PSB/Cases/2019
Dated Peshawar the, January 17, 2020

Mr. Muqairab Khan,
Research Officer (BPS-17),
Archives & Libraries, Khyber Pakhtunkhwa



SUBJECT: WARNING.

I am directed to refer to the subject noted above and to state that you were found involved in shifting of an expensive scanner machine in Directorate Archives & Libraries from its actual position and hiding it in office rack. You were motivated by the desire to arise sense of responsibility amongst your fellow colleagues by doing so. However, your stand is unjustified, unreal and contrary to the office decorum.

The Competent Authority has therefore taken serious notice of your action and issues strict warning to refrain from such actions in future.

SECTION OFFICER (C-IV)

Endst: No. & Date as above.

Copy to the: -

1. Director Archives & Libraries, Khyber Pakhtunkhwa
2. PS to Secretary, Higher Education Department
3. Master file

SECTION OFFICER (C-IV)

The Chief Secretary,
Khyber Pakhtunkhwa Province.

CONCEALMENT OF FACTS REGARDING PROMOTION CASE
OF MR. MUQARRAB KHAN, RESEARCH OFFICER.

Respected Sir,

It is submitted that a case regarding promotion of Mr. Muqarrab Khan, Research Officer to the post of Deputy Director in Directorate of Archives & Libraries, Peshawar has been forwarded for consideration in the upcoming meeting of Provincial Selection Board. The following facts have been concealed to mislead the PSB for the sake of the subject case: -

Adverse PER for the year, 2004 already communicated to Mr. Muqarrab Khan, Research Officer. The said PER has been now falsely replaced by the Director, Archives & Libraries. The same fact is mentioned in para-ii of my letter addressed to the Director, Archives & Libraries, copies also endorsed to the Deputy Secretary(Admn) and Joint Secretary, Higher Education, Archives & Libraries Department. Copy attached.

A FIR regarding theft of scanner from Directorate of Archives & Libraries was registered vide No. 2577/3/10/DA dated 31-08-2018. Mr. Muqarrab Khan, Research Officer was directly spotted involved in the subject theft case in CCTV video. The matter was reported to the Secretary, Higher Education, Archives & Libraries Department vide No. 2599/3/10/DA dated 05-09-2018 but no action was initiated in the case. Copies attached.

On complaint of Librarians of Directorate of Higher Education, Provincial Inspection Team has started inquiry in the subject theft case and necessary documents have been provided to PIT vide No. 3115/3/10/DA dated 01-11-2018. Cutcome of the inquiry is still unknown. Copy attached.

Brief of the case was forwarded to Section Officer(C-IV), Higher Education, Archives & Libraries Department vide No. 2744/3/10/DA dated 26-04-2019, copy of the letter was also endorsed to the PS to Secretary Higher Education Department. Copy attached.

The officer is working as Litigation Officer in HED with out any formal notification and has developed personal contacts with authorities of HED, resultantly, due to the exposure of the case at PIT level, the authorities of HED did not initiate any action in the matter.

Previously, the Director, Archives sent several cases to the administrative department for initiating disciplinary proceedings against Mr. Muqarrab Khan, however, the officer owing to political & personal contacts has successfully thwarted all such cases.

P.T.O.

8. In view of the above mentioned facts, it is requested that issues regarding replacement of adverse PER- 2004 proven involvement of Mr. Muqarrab Khan in the scanner theft case and failure of the HED's authorities in initiating disciplinary proceedings in the matter, may be investigated before considering an unscrupulous officer who has been previously found involved in launching defamation campaign in 2004 against his parent Office and now openly spotted stealing of scanner with same malafide intentions please.

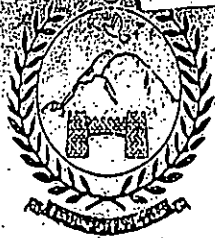
Yours Faithfully,

(Nigar Ali)
Ex-Deputy Director
Directorate of Archives & Libraries,
Peshawar.

Copy forwarded to: -

- 1- Secretary, Higher Education, Archives & Libraries Department.
- 2- Director, Archives & Libraries, Khyber Pakhtunkhwa.
- 3- Incharge, Complaint Cell, Chief Minister Complaint Cell, Khyber Pakhtunkhwa.
- 4- Section Officer, Provincial Selection Board, Khyber Pakhtunkhwa.

Ex-Deputy Director
Directorate of Archives & Libraries,
Peshawar



Annexure

B6

342/

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.

Phone: - 091-9210100 Website: - www.kpdal.gov.pk
www.facebook.com/KParchivesandlibraries

No. _____/1/91/DA Dated 16/03/2022.

To,

The Director,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Subject: JOB DESCRIPTIONS

R/Madam,

Kindly refer to your letter No. 347/1/91/DA Dated: 23/02/2022 on the subject noted above. Followings are the job descriptions of the Research Officers:

- i. Acquiring files/record from different government and private sources and preservation and organization of the same record after categorisation into A, B, C, & D as per manual of Secretariat Instructions.
- ii. Listing of record from different sources and its facilitation to research scholars, government functionaries and public.
- iii. All the lists and inventory of different departments and organizations are available and well preserved and organized.
- iv. As above in Serial No. 3.
- v. No physical verification has so far been conducted.
- vi. Without physical verification nothing can be said about this.
- vii. 152,608 publications have been scanned, computerized and digitized of this section.
- viii. No research work is the duty of Research officers which cannot be assigned because the existing work of the Research Officers is too voluminous and labour demanding in nature. The Research Officers can only facilitate Research Scholars and providing Government functionaries, the desired record.
- ix. Summaries of different files are available for Research Scholars. It may be mentioned that the research officers will not be able to conduct research in addition to their existing duties/responsibilities. Neither the Research officers have the required capacity to conduct Research nor is Research the requirement of them in connection with the primary duty of acquiring Government record and preserving them on scientific lines.

The questionnaire served shows that the Research Officer do not have any job description after till date and the Director, who has served as Librarian for more than 20 years, is not aware of the status of archival holdings of this directorate.

The job description of each and every officer has been minutely prepared by the Ex-Director and the officers including RO's following them. It will be desirable to refrain from such frivolous exercises which entails money, labour, and service. It is proposed to enforce the job description already assigned. If any staff member doesn't comply with these job descriptions then disciplinary action may be taken against them.

The Research Officer Muneer Alam failed to give any input in this regard. He may again be proposed for disciplinary action to the Secretary Higher Education Department.

It may kindly be submitted after meeting and consultation held with the Research Officers.


Yours faithfully,

(Muqarrab Khan)

Deputy Director

Directorate of Archives & L
Khyber Pakhtunkhwa, Peshawar

I responded to each and every letter. I put my comments in a very plain English i.e. My reporting as per my Job Description in Director & Libraries, my counter signing authority is Secretary Higher Education and my Competent Authority is Chief Secretary. Any change in my Job Description or conducting an enquiry against me need prior approval of the Competent Authority. Moreover, I also stated in my previous replies that for checking my progress and efficiency, please check the points I raised in my response to an explanation by Director A & L, whose copies are also sent to S.O (CIV) and Secretary, Higher Education. Still waiting for legal action on the part of the high ups. It is not possible for me to violate Official Secrecy Act's instructions,



16-03-2022

To

The Secretary
Higher Education, Archives & Libraries.
Government of Khyber Pakhtunkhwa, Peshawar.

Through Proper Channel.

Subject: RECORD OF HIGHER EDUCATION NEEDS ATTENTION

Respected Sir,

With due respect, it is stated that as per Office Order No. 2227, dated 6th Nov, 2014, (copy enclosed as annexure A), I was deputed to Higher Education for weeding the record. I submitted my report to the Director Archives & Libraries (copy enclosed as annexure B). After consulting the concerned officers of HED, you will come to know that what happened to that record.

02- Then as per Office Order No. 2417/10/40/DA, dated 31st Dec, 2015, (copy enclosed as annexure C), I was deputed to Higher Education for weeding purpose. I met with the Deputy Secretary and Section Officer (G) and requested the Deputy Secretary that the concerned Officers may kindly be directed to prepare the list of the Obsolete Record and then kindly inform me to start weeding of the record. What happened next is attached (copy enclosed as annexure D).

03- Recently, I received on 24th May, 2016, the Office Order No. 1127/10/40/DA&L, dated 23rd May, 2016 (copy enclosed as annexure E). Copy of what happened during the last few days is attached (as annexure F) and copy of my report is attached (as annexure G). Latest development is attached as annexure H&I. After going through my report, one can easily judge that if the Department has not yet prepared the list of their obsolete record, i.e., not ready, then why that Department invites the staff of Archives. God knows the motive behind this.

04- I would like to draw your kind attention towards the worse condition of Record lying with the District Governments. Similarly, one will surprise to know that how the other Administrative Departments manage their record. Enquiry may be needed to know that during the last round about twenty years, how much and how (i.e., selection of record, having Archival Importance, by the Research Officer, from the record declared as Obsolete by its parent Department) records shifted to Archives by the Administrative Departments as well as the District Governments, especially Finance Department, Excise Department, P&D, LRH etc. (Note. Below the rank of Research Officer is not authorized to select and receive the record of other department).

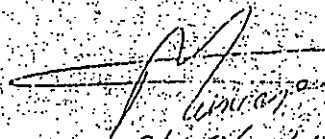
06. You are, therefore, kindly requested for help and in a kindly be directed a concerned officer to provide you the exact information that when happened to that person for which I was deputed on 6th Nov, 2014 to Higher Education (Detail is mentioned above on first paragraph).

07. Thanking you in anticipation,

Yours sincerely,

Muneer Alam,
Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa Peshawar.

Copy in advance to PS to Secretary Higher Education, Archives & Libraries Department, Government of Khyber Pakhtunkhwa, Peshawar.


01-06-2016

Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa Peshawar

*Received
along with e-closures*
Asad
01-06-2016

*Received
along with all
enclosures*
[Signature]
11/6/2016
4:45 PM

To

The Director Archives and Libraries,
Khyber Pakhtunkhwa, Peshawar.

Subject: IMPROVEMENT OF EFFICEINCY AND OVERALL CONDUCT/
SUBMISSION OF PROGRESS REPORT

Reference letter No 1654/10/40/DA dated 15/10/2020 it is stated that before visiting the Finance Department I would like to request for conducting an Inquiry in this case as the Finance Department in the letter No SO (A)/FD/1-38/2020 dated 5th October 2021 clearly mentioned that they put their old record in Bags as per the instructions of the representative of the Directorate of Archives and Libraries. Now need is to know that who is that Representative who not only interfered in my duties but misguided the Finance Department and most possibly other departments too. I am the concerned Officer as per my Job Description/Nature of duties for dealing the Records of outside Departments and I have no information about such activities as I was bypassed for the last so many years regarding bringing the record from outside Departments. As per standing rules, the Job of the Research Officer is the selection of Record having Archival Importance from the Record already declared as Obsolete Record from the non-current record of the record originating Departments and then the transfer of such selected record to the Provincial Archives to be preserved for indefinite period. So putting old record in Bags along with furnishing the list of the old record in Bags is totally an illegal activity. Being the custodian of the Record, maximum responsibility falls on Provincial Archives in this case. Only after fixing the responsibility on the concerned quarters in this case, we would be able to deal positively the Finance Department and other Departments as well. Moreover, an Inquiry in this case will reveal that ^{how} much record and under what Procedure came to this Office during the past so many years, plus, now where that record is at present.

As per the Job Descriptions of Deputy Director, he is responsible for Administration of the Directorate, budget, promotion cases, account matter, DPC's meeting etc. After the promotion of Research Officer to the Post of Deputy Director, his Job Descriptions becomes changed. As per standing rules, the Research Officer is answerable to the Director only for the Archival activities mentioned in his Job Description. Interference in Reporting Channel will lead only to mismanagement and corruption. The Job Description issued by the previous Director, in the recent past, is beyond my understanding by which a Librarian posting on the vacant seat of Deputy Director was entrusted the works of Archives.

2. Regarding Para No.2 of the letter it is stated that before inspecting the Record Rooms of other Departments I would like to draw your attention towards the Record Room of the Directorate of Archives and Libraries as Charity begins from home. If our own Record Room, being the custodian of the record, is in such condition then imagine what type of message we are going to convey to others. The Record Room of this Directorate in the light of Manual of the Secretariat Instructions needs your immediate attention. Most Departments have no Record Rooms at all. Selection of Record having Archival importance from the Obsolete Record of other Department is the second phase.

As per the statement of this Office Order i.e. You will not perform any outside district visit unless the completion of the said task, I will not be responsible for anything related to my duties towards the record lying in bad condition in the Record Rooms of Outside Districts, keeping in mind, the prevailing situation of the task ahead already discussed above as this task will take time to reach to its logical conclusion.

Being a Research Officer (BPS) I am required to sit in my Designated Office for performing my official duties but unfortunately my Designated Office as per

(112)
SO (C-12)
Progress plan

27/

the Map of this Directorate was previously occupied by a Preservation Assistant who was caught red handed by NAB and now this Office is occupied by a Librarian typing various official letters as per the orders of the previous Director. At present I am using a room on the top of the building as my office whose split air conditioner is out of order. I submitted an application on 24-08-2021 for its repair but still not checked and repaired by the concern quarter. Physical supervision i.e. Administration of Weeding Section is the part of my duties and I from time to time visit the section. I will be available for any official activity when required. Here, I would like to mention that in the past many times Officers of this Directorate made interference in weeding section/my duties, a very sensitive crime. Furthermore, during my entire service career I was never marked the PERs of my subordinates and I from time to time reported my high-ups about all these things but no action was taken in this regard which show the actual picture of both Weeding Section and mine as well. Furthermore, Selection of Record having Archival importance from the obsolete record of non-current record of other departments is the job of Research Officer while Weeding of the Record of Provincial Archives is the exclusively job of the Director as per National Archival Act 1993, extended to all Pakistan. The detail procedure is laid down in the act.

I regularly punching biometric without making any complain about other senior Officers of this Directorate who never bothered punching biometric since its installment in this Office though Law equally applies on all. I have no other private business activity in Peshawar except my Government Job so it is a common sense thing that why I will leave my Office without any genuine reason. Since the beginning of the Covid-19 Pandemic I pick my children from school by myself and when the severity of this Pandemic will be reduced I will arrange Public transport for them as in the past. Moreover, being an Archivist of this Department, discussing various issues related to Archives is an appreciating act as the field of Archives covers not only past period, but present and future too. I never negatively interfered in the works of others throughout my service career. Never interfered in the activities of our Library which run without any Computerized Catalogue, not maintaining the Book Card, without proper procedure adopted for Weeding of the Books etc. Books were purchased without following the standard procedure for selection of Books by the previous Director. These are very serious issues and loss of Public as a whole, but never raised such serious issues due to my occupancy in Archives.

3. Para 3 of the letter relates to my behavior/character. The previous Director instead of criticizing my behavior raised my behavior among different staff members. Government Vehicles of this Directorate are for Official duty, especially for Archives wing as Library activities demand no Vehicle. If a Government Vehicle is free and available for official duty then why issue would be raised regarding the use of Vehicle by a Government Officer for his official visit to far flung areas.

4. Para 4 relates to my annual PER. As per Standing rules, only senior Officer relevant to work can report the PER of his subordinate. So relevancy is must. In this regard, Legal opinion from competent forum is required that either a Senior Officer, having a Library background can report the PER of an Archivist or not. Furthermore, I would like to bring your attention for the Archives are two different fields. For sake of better Administration I would like to report the PER of officers/officials and one can easily report the PER of a Chief Librarian. The present Director was a Chief Librarian and I reported the PER of Research Officer of Archives wing for the period of 2018 on the instruction of former Director. Keeping in mind the Research Officer never served under Chief Librarian. This wrong reporting/countersigning of PERs of officers/officials is a common established practice in the Directorate which needs your special attention. Moreover, for the sack of better Administration I would like to mention that I submitted a page

Director

sitting

15-07-2021 in order to confirm my ^{ed} earn leave quota from AG office. I mentioned in the proforma three months leave to be required for some domestic urgent work. The competent authority for the sanctioning of my ^{ed} earn leave is the Secretary Higher Education. The Director using the authority of the Secretary of Higher Education stated "not allowed till the completion of assigned task". After few days the Director cancelled all activities regarding that task.

Highlighting any shortcoming on my part by my high-ups with their sympathetic guidance will improve my efficiency. You are, therefore, requested for accepting my plea in positive sense and oblige.

Thanking you in anticipation.

Yours Sincerely,

(Muneer Alam)

Research Officer

Directorate of Archives and Libraries,
Khyber Pakhtunkhwa, Peshawar.

[Handwritten Signature]
20-10-2021

Endst: No. & Date Even.

Copy forwarded to:-

- Y. Khan*
3/11/2021
1. Section Officer (C-IV), Higher Education, Archives & Libraries Department
 2. PS to Secretary, Higher Education, Archives & Libraries Department.

(Muneer Alam)

Research Officer

Directorate of Archives and Libraries,
Khyber Pakhtunkhwa, Peshawar.

Received on 21/10/2021
[Handwritten Signature]

Annexure "E" "E" 11/17/

The Honorable Chief Secretary,
Government of Khyber Pakhtunkhwa,
Peshawar.

Through: Proper Channel.

Subject: Representation for Justice. The violation of the Rules/delay in recruitment process of the Post of Research Officer(initial) (BPS-17), became vacant in Nov. 2000 and then filled up in Nov.2007, disturbed the sequence of seniority of this Post in the existing Service Structure, making its Present incumbent to remain in the same Scale and same Post for roundabout 18 years after depriving him from promotion to the post of the Deputy Director that is going to be vacant in the end of April, 2018 under the existing Departmental Seniority List which was circulated after 8 years, if the issue is not addressed judiciously on time.

Respected Sir,

With due respect it is stated that before receiving the present Joint Seniority List enclosed as annexure "A" on dated 8th March 2018, I received the joint seniority list for the first time on dated 13th May 2014 and I submitted my reservations to the Director Archives and Libraries on time copy enclosed as annexure "B" and the reply of the Director Archives and Libraries is attached as annexure "C", then appealed to the Secretary Higher Education Archives and Libraries on 05-08-2016, copy enclosed as annexure "D". I raised three points in my application to the Director Archives and Libraries at that time. Firstly, the delay in the recruitment process of the Post of Research Officer (initial). Secondly, the attachment of the newly created Posts of the ^{Assistant} Deputy Directors, belong to a different Cadre and are not the part of the Archives side, with the Research Officer in Joint Seniority. Thirdly, The Archives side and the Library side of the Directorate of Archives and Libraries should have equal rights regarding up gradation as both are two wings of the same Directorate. In fact, the up-gradation policy was for the Librarians of the Directorate of Higher Education i.e. College Librarians who had no further chances of promotion while the Librarians in the Directorate of Archives and Libraries had already window for further promotion to the post of Chief Librarian and then the Director Archives and Libraries under the existing service structure. So, the Archives side may also be given up gradation like the Librarian side of the Directorate of Archives and Libraries as both are two wings of the same Directorate.

1. Background of the Delay in the recruitment process of the Post of the Research Officer(initial) whose Nature of duties was specified.

There were two posts of Research Officers (BPS-17); one was specific and was by initial recruitment whose Nature of duties was specified copy enclosed as annexure E. The Post of



Research Officer (by Initial) became vacant in November, 2000. I was promoted to the Post of the Deputy Director and then Director of the Directorate of Archives and Libraries in Aug. 2002. So, the Post of Research Officer (by Initial) remained vacant since Nov. 2000 till my arrival in November, 2002.

(The copy of existing service rules of the Directorate is attached in annexure-F)

2. Untimely completion of Recruitment process for the Post of Research Officer (by initial) are going to affect the seniority sequence of this post and its incumbent will remain for 1 years on the same scale and same post.

The delay in the advertisement / completion of recruitment process of the post of Research Officer (by Initial) disturbed the routine sequence of seniority of this post and resultantly is now depriving the incumbent of the post of Research Officer (by initial) from promotion to the post of Deputy Director under the present Departmental Seniority List. The matter needs serious and urgent attention because it is directly affecting my chance to promotion to the post of Deputy Director as my post is by initial recruitment. If the matter is not now addressed judiciously then I will have to wait for promotion to the post of Deputy Director for about eight years further after already serving for more than 10 years on the same scale and same post. The total span of service will become 18 years on the same scale and same post. As according to the existing service rules, the senior most one, between the post of the Deputy Director and the post of the Chief Librarian, will be promoted to the post of the Director Archives and Libraries. Since the Chief Librarian being retired (Retired in January 2018) earlier than the Deputy Director (will retire in the end of April 2018) then obviously the new Chief Librarian will be senior to the New Deputy Director and thus the new Chief Librarian will be promoted to the post of the Director Archives and Libraries after the retirement of the present incumbent of the post of the Director in 2021 and then the new Director will retire in 2025.

You are, therefore, kindly requested that I may be compensated/not be deprived from the right of Promotion to the Post of Deputy Director in the light of the above-mentioned facts.

Thanking you in anticipation.

Yours Sincerely,

Muneer Alam,
(Research Officer),
Directorate of Archives and Libraries,
Government of Khyber Pakhtunkhwa,
Peshawar.

Received
7/14/18

SUBJECT

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My
sub

2



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION ARCHIVES AND
LIBRARIES DEPARTMENT

No. SO(C-IV) HED 1-7 Seniority Archives Vol-11 2019 8/597-98
Dated Peshawar the, July 25, 2019

The Director,
Archives & Libraries Khyber Pakhtunkhwa

SUBJECT: NOTIFICATION OF THE FINAL UPDATED COMBINED SENIORITY LIST OF THE HOLDERS OF THE POST OF RESEARCH OFFICER (BPS-17) AND ASSISTANT DIRECTOR (BPS-17).

I am directed to refer to your letter No. 4768 3-52/A/DA dated 15-07-2019 on the subject noted above and to state that written observations on seniority list from Mr. Munir Alam Research Officer, may be obtained within 03 days positively and submit the same to this department for further processing.

2. If the observations are not received within the stipulated time period, the seniority list will be processed without any further delay, please.

SECTION OFFICER (C-IV)

Endst: No. & Date as above.

Copy to the:-

- 1. Mr. Munir Alam Research Officer (BPS-17), Directorate of Archives & Libraries and Libraries.
- 2. PS to Secretary, Higher Education Department.
- 3. Master File.

SECTION OFFICER (C-IV)

Annexure F2
Annexure F2



DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.

Phone : 091- 9210100 Website: www.kpca.gov.pk
www.facebook.com/KParchivesandlibraries

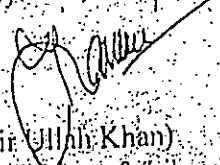
No. 4843/3/52/DA Dated 29 /07/2019.

Mr. Muneer Alam, Research Officer,
Directorate of Archives & Libraries, Peshawar.

Subject: NOTIFICATION OF THE FINAL/UPDATED COMBINED SENIORITY LIST OF THE HOLDERS OF THE POST OF RESEARCH OFFICER(BPS-17) & ASSISTANT DIRECTOR(BPS-17).

Reference Section Officer(C-IV), Higher Education, Archives & Libraries Department letter No. SO (C-IV)/HED/1-7/Seniority Archives/Vol-II/2018/597-98 dated 25-07-2019 on the subject noted above, received in this Office on 29-07-2019 (copy enclosed).

02- You are accordingly directed to submit your written observations on the subject seniority list within 03-days of the issuance of this letter positively.


(Zahir Ullah Khan)
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & Date Even:

Copy forwarded to the Section Officer (C-IV), Higher Education, Archives & Libraries Department with reference to his letter referred to above.

Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

The Director of Archives & Libraries
Khyber Pakhtunkhwa Peshawar

NOTIFICATION OF THE FINAL/UPDATED COMBINED SENIORITY
LIST OF THE HOLDERS OF THE POST OF RESEARCH OFFICER
(BPS-17) AND ASSISTANT DIRECTOR (BPS-17)

pected Sir.

Reference Section Officer(C-IV), Higher Education, Archives & Libraries
Department letter No. SO(C-IV)HED/1-7/Seniority Archives/Vol-II/2018/597-98 dated 25-07-
19 communicated vide No:4843/3/52/DA dated 29-07-2019.

I am duty bound to reply in this regard. Before stating anything, I would like to
mentioned here that my appeal dated 10-04-2018(copy enclosed as Annex-A) to the Chief
Secretary, Khyber Pakhtunkhwa in the matter is still awaited i.e. I did not receive any further
directions from the Chief Secretary in this regard.

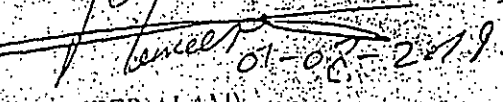
03- Sir, I still stand by my previous reservations in the matter i.e. the inclusion of the
newly created posts of Assistant Directors in the joint seniority list with Research Officers is
beyond my understanding. Research Officer belongs to Archives Wing i.e. research work, while
the Assistant Directors belongs to Establishment Section i.e. dealing accounts & budget matters.
These are two different cadres. Moreover, due to inclusion of the Assistant Directors in the joint
seniority list, the promotion of Assistant Research Officers (BPS-16) of Archives wing will be
permanently stopped.

04- Secondly, Mr. Muqarrab Khan, has been wrongly promoted to the post of
Research Officer which is a specific post and whose nature of duties are specified during its
sanctioning order(copy enclosed as Annex-B). This post of Research Officer is specific post and
it was required to be filled by direct recruitment. After wrong promotion of Mr. Muqarrab Khan,
the service structure was changed accordingly due to which the identity of this post is
disappearing, leaving adverse effects on the very definition of Archives.

05- In light of aforementioned submissions, my reservation on the seniority list is still
intact.

06- Thanking you in anticipation and sympathetic consideration please.

Yours Sincerely,


(MUNEEB ALAM)
Research Officer

Directorate of Archives & Libraries
Khyber Pakhtunkhwa Peshawar



Copy forwarded to the Section Officer(C-IV), Higher Education, Archives &
Libraries Department, Khyber Pakhtunkhwa with reference to his letter referred to above.

Research Officer,
Directorate of Archives & Libraries
Khyber Pakhtunkhwa Peshawar

Received
2019. 7. 10

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

NO.SO(C-IV)HD/1-7/Seniority Archives Research Officer 2020
Dated Peshawar the, February 3, 2020.

The Director,
Archives & Libraries, Khyber Pakhtunkhwa.

SUBJECT: NOTIFICATION OF THE FINAL COMBINED SENIORITY LIST OF
HOLDERS OF THE POST OF RESEARCH OFFICER (BPS-17) IN
DIRECTORATE OF ARCHIVES & LIBRARIES, KHYBER
PAKHTUNKHWA AS IT STOOD ON 01-01-2020

I am directed to refer to your letter No. 428352/DA dated 22-01-2020 on the subject noted above and to state that a meeting has been scheduled to be held on 06-02-2020 at 1100 hours under the Chairmanship of Additional Secretary (Development) Higher Education Department in his office to settle the issue of disputed seniority as claimed by Mr. Muneeb Alam, Research Officer, Directorate of Archives & Libraries.

2. You are therefore requested to make it convenient to attend the meeting at aforementioned date, time and venue, please

SECTION OFFICER (C-1)

Endst: No. & Date as above.

Copy to the: -

1. PS to Secretary, Higher Education Department.
2. Mr. Muneeb Alam, Research Officer (BPS-17) Directorate of Archives & Libraries, Khyber Pakhtunkhwa.
3. Master file.

SECTION OFFICER (C-1)

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

NO. SO(C-IV) HED/1-7/Seniority Archives/Research Officer/2020
Dated Peshawar the February 20, 2020.

3419-20

To
The Director,
Archives & Libraries, Khyber Pakhtunkhwa.

Mr. Munir Alam,
Research Officer (BPS-17),
Directorate of Archives & Libraries, Khyber Pakhtunkhwa.

SUBJECT: MEETING TO RESOLVE THE ISSUE OF DISPUTED SENIORITY OF MR. MUNIR ALAM, RESEARCH OFFICER (BPS-17), DIRECTORATE OF ARCHIVES & LIBRARIES, KHYBER PAKHTUNKHWA.

I am directed to refer to the subject noted above and to state that a meeting has been scheduled to be held on 27-02-2020 at 1100 hours under the Chairmanship of Deputy Secretary (Litigation) Higher Education Department in his office to settle the issue of disputed seniority as claimed by Mr. Munir Alam, Research Officer (BPS-17), Directorate of Archives & Libraries.

2. You are therefore requested to make it convenient to attend the said meeting at the given date, time and venue, please.

[Signature]
SECTION OFFICER (C-IV)

Endst; No. & Date as above.

Copy to the:-

1. PS to Secretary, Higher Education Department.
2. Master file.

SECTION OFFICER (C-IV)

DIRECTORATE OF ARCHIVES & LIBRARIES
KHYBER PAKHTUNKHWA, PESHAWAR

Dated Peshawar the _____ January, 2014

OFFICE ORDER

No. _____ / Reference telephonic directive by Special Secretary Higher Education, Archives & Libraries Department, Government of Khyber Pakhtunkhwa, the services of the following officer/official of the Directorate of Archives & Libraries, Khyber Pakhtunkhwa is hereby placed at the disposal of Director, Higher Education Teacher Training Academy, Hayatabad with immediate effect till further order :-

1. Mr. Munir Alam, Research Officer,
Directorate of Archives & Libraries, Peshawar
2. Mr. Niamat Ullah, Computer Operator,
Mufti Mehmood Public Library, D.I.Khan

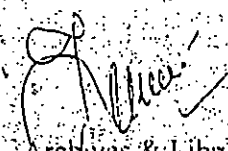
(ZAHIR ULLAH KHAN)
Director of Archives & Libraries,
Khyber Pakhtunkhwa,
Peshawar

Endst: No. 225-28 /3/1/DA & L

Dated Peshawar the 10 January, 2014

Copy forwarded to :-

1. The Private Secretary to Secretary Higher Education, Archives & Libraries Department, Government of Khyber Pakhtunkhwa for information.
2. The Private Secretary to Special Secretary Higher Education, Archives & Libraries Department with reference to telephonic conversation with Special Secretary, Higher Education & Archives & Libraries, Peshawar
3. The Incharge, Mufti Mehmood Public Library, D.I.Khan for information and necessary action.
4. Mr. Munir Alam, Research Officer, Directorate of Archives & Libraries, Khyber Pakhtunkhwa, Peshawar for compliance.
5. Mr. Niamat Ullah, Computer Operator, Mufti Mehmood Public Library, D.I.Khan for compliance


Director Archives & Libraries,
Khyber Pakhtunkhwa,
Peshawar

E / \

Annexure 3

The Secretary to Government of Khyber Pakhtunkhwa,
Higher Education, Archives & Libraries Department.

Subject: APPLICATION FOR THE REIMBURSEMENT OF HOUSE - RENT.

Respected Madam,

With due respect it is stated that I had submitted an application to the Secretary, Higher Education, Archives & Libraries Department on 03/10/2012 through proper channel, having the above mentioned subject which was not forwarded to your good office by the Director of Archives & Libraries, Peshawar. (Copy of the application is enclosed).

You are, therefore, kindly requested for necessary orders and help please.

Thanking you in anticipation.

Your Faithfully

Muneer Alam
(Muneer Alam) 09-07-2014

Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa.

Copy to the Director Archives & Libraries Department, Government of Khyber Pakhtunkhwa, Peshawar.

Muneer Alam
(Muneer Alam) 09-07-2014
Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa.

9/7/14

Page 26

Annexure 2

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

No. S (C-IV)HE 1-6/2015

Date: Peshawar the, January 14th, 2016

302

82/8/1/100
19-1-2016

The Secretary to Govt. of Khyber Pakhtunkhwa,
Administrative Department

APPLICATION FOR THE RE-IMBURSEMENT OF HOUSE RENT

I am directed to enclose herewith an application in respect of Mr. Muneer Alam Research Officer Directorate of Archives and Libraries, Khyber Pakhtunkhwa, on the subject noted above and to request that please provide the Government Assessment Rules Government rate for Government servants not market rate for BOQs (Bachelor Quarters) near NC Flats, Khyber Road Peshawar, which are suites (House Rent Deduction Rules for BOQ only)

It is, therefore, requested that if the said Rules are not yet framed then kindly issue NCC Exemption Certificate enabling him to claim reimbursement of the House Rent that is being deducted from his pay since December 2010, as per Rules/Policy please.

Encl: as above.

(S. IAH SAUD)
SECTION OFFICER (C-IV)

Copy forwarded to

Mr. Muneer Alam Research Officer Directorate of Archives and Libraries Khyber Pakhtunkhwa

[Signature]
SECTION OFFICER (C-IV)

82/8/1/100

26

Page 57
2221

"9" Annexure 3
259



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

No. 30 (Admn) No. 4 BOQ NC File
Peshawar the 15-07-2021

[Handwritten signature]

Munir Alam
Occupant of 4 BOQ NC File
Peshawar

Subject:

APPLICATION FOR THE REIMBURSEMENT OF HOUSE RENT.

Kindly refer to your application dated 05-5-2021 and to state that as per allotment Rules 2018, if any public office holder has been allotted govt. accommodation, normal rent shall be charged from the allottee. Furthermore, as per Finance Department letter No. FD (SR-11) 2-15178-Vol:V, dated 23-01-1989, if a Govt. accommodation consist of two rooms or less, 5% maintenance charges are not applicable in this case.

In view of the above, your request has been filed due to not covered under the rules, please.

End of Even No & Date

Copy forwarded to:-

- 1. PS to Secretary Administration Department.
- 2. PA to Deputy Secretary (Admin) Administration Department.

[Handwritten signature]
ESTATE OFFICER

[Handwritten signature]
ESTATE OFFICER

Reminder



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

No. EO (Admn) 04-BOQ-NC Flats
Dated Peshawar the 11.8.2016

To

The Director
PBMC C & W Department.

Subject:

RENT ASSESMENT OF BOQ AT NC FLATS KHYBER ROAD PESHAWAR

I am directed to refer to this department letter of even no. dated: 12.4.2016 on the subject noted above and to state to provide the same to this office in light of 15% House Rent payable to the Govt. Servant or to fix standard rate of flat to Bachelor accommodation (BOQ).

Endst. Of Even No & Date

ESTATE OFFICER

Copy forwarded to

1. Mr. Munir Alam, occupant of 4 BOQ NC Flat.
2. PA to Deputy Secretary (Estate) Administration Department.

ESTATE OFFICER

Annexure J

J

791
19/12/2022

Annexure J 361

The Secretary

The Secretary to Govt. of Khyber Pakhtunkhwa,
Higher Education, Archives & Libraries Department.

Subject: - ISSUE REGARDING NON-EVALUATION OF MY PERFORMANCE
& EVALUATION REPORTS SINCE MY APPOINTMENT ON
07-11-2007 TILL DATE.

Respected Sir,

With due respect it is stated that my PERs right from my appointment on 07-11-2007 till date have not been forwarded to the countersigning authority i.e. Secretary, Higher Education, Archives & Libraries Department for countersignature. In this regard, the Director, Archives & Libraries has sought many explanations from me which I duly replied in time.

02- Sir, when I received for the first time the circular letter bearing No. 481-90/3/1/DA dated 10-03-2015 regarding submission of PERs, I submitted all my PERS i.e. from 2008 to 2014 on 01-07-2015 received vide diary No. 1461/3/49/DA dated 13-07-2015. From January, 2014 to October, 2014, I was in Higher Education Teachers Academy (HETTA) now HEART at Hayatabad. The progress report which was very appreciative of that period was already sent to the Director, Archives & Libraries by the then Director, HETTA as demanded by my parent department. Afterwards regularly submitted my annual PERs intima.

03- In response to the explanatory letter No. 4777/3/52/A dated 16-07-2019 regarding my factual progress against my assigned job description, I explained my position in reply submitted on 22-07-2019. copy attached as Annexure-A.

04- In view of the above, your good service is requested to kindly resolve my problem as explained above.

05- Thanking you in anticipation.

Yours Sincerely,

(MUNEER ALAM)
Research Officer,
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Copy forwarded to:-

01- Special Secretary, Higher Education, Archives & Libraries Department,
Higher Education, Archives & Libraries, Khyber Pakhtunkhwa.

Annexure "J2"
Annexure "J2"
791
19/12/2022

The Secretary

Annexure "J2"

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

Phone No: 9213561-2 Ext. 20 Fax #091-9210368

NO. SO(C-IV) HE/1-6/RTI/Munir Alam/2023/574748
Dated Peshawar the: April 10, 2023



The Munir Alam,
Research Officer (BPS-17),
Directorate of Archives and Libraries, Khyber Pakhtunkhwa.

SUBJECT: COMPLIANT AGAINST NON-SUPPLY OF INFORMATION
(COMPLAINT NO. 10201)

I am directed to refer to the subject noted above and to inform you that your appeal was examined in detail and processed in this department and finally it was decided that "the case has already been decided vide letter No. SO (C-IV) HE/1-6/Archive Misc/Munir Alam PERs issue/2021/869 dated 14.02.2022 (copy enclosed). Series of appeals are not covered under the rules. When appeal is once decided, no further appeal is entertained". Director, Archives and Libraries was asked to inform you accordingly.

Furthermore, your reporting and countersigning channel for PERs has already been declared by the Competent Authority and accordingly your PERs will be reported and countersigned at Directorate of Archives and Libraries, Khyber Pakhtunkhwa, please (copy of PERs instruction 2006 is attached).

5/11/3/19
13/04/23

[Signature]
(ZAHID IGHMAL)
SECTION OFFICER (C-IV)

Endst of Even No. & Date

Copy forwarded for information to the:-

1. Assistant Registrar, KP Information Commission, Peshawar w.r.t letter No. RTIC/AR/1-201/23 dated 14.03.2023.
2. P.S to Secretary, Higher Education Department.
3. Master File.

[Signature]
SECTION OFFICER (C-IV)

*D.D / officer concerned
for information and f.w.a*

791 Secy
19/12/2022

To,

The Secretary,
Higher Education, Archives & Libraries Department,
Khyber Pakhtunkhwa, Peshawar.

Through Proper Channel.

Subject: - REQUEST FOR COMPREHENSIVE RELEVANT COMMENTS, HIGHLIGHTING THE REAL POSITION OF MY PROGRESS IN RESPONSE TO THE LETTER NO. 2493/3/49/DA DATED 08-12-2022 AND CORRECTING THE DIRECTION OF MY PERS' CASE.

Respected Sir,

With humble regards it is stated that a letter No. *SO(C-IV) HE/1-6/Archives Misc/Munir Alam PER, issue/2021/5681 dated 20-10-2022* (Annexure-A) was issued from SO (C-IV) towards the Director of Archives and Libraries for comprehensive comments regarding my appeal (enclosed as Annexure B) to the Secretary HED, where in the Secretary HED was requested for help regarding hanging of my applications either within directorate or in the C-IV section. In the application enclosed as (Annexure-B) the reference of my previous three applications was given. The brief and processing status of my previous three applications is as under.

- a. The first through proper channel application addressed to the Secretary HED submitted in the Directorate on 05-07-2022 was not forwarded to the Secretary HED after the laps of more than two and half months (Annexure-C).
- b. The second application related to my seniority issue submitted on 10-04-2018 is still not forwarded to the Chief Secretary, Khyber Pakhtunkhwa for consideration (Annexure-D).
- c. The third application addressed to the Director Archives and Libraries (Annexure-E) in which I had raised some sensitive points regarding the Directorate of Archives and Libraries. The copy of the said application was also forwarded to Secretary HED and SO (C-IV), the then Additional Secretary HED marked the same application to SO (C-IV) for processing, which was not processed by SO(C-IV) till date.

In this connection I requested to the Secretary HED for a strong worded reminder to the quarter concerned through a copy of my application addressed to the Director Archives & Libraries (Annexure-F) but the reply of the application enclosed as annexure-B is still awaited on the part of the Directorate.

2. In connection to my PERs issue the Director of Archives & Libraries issued a letter no.2493/3/49/DA, dated 08-12-2022(Annexure G) which needs clarification in some areas for the sake of my career, image and getting to the ground realities.

- i- Sir, My Reporting Officer was Director Archives & Libraries cleared from the written orders of the Ex-Director from time to time (copies enclosed as Annexure H&I) but he in violation of rules badly Reported my PERs by the irrelevant quarters within the Directorate during the last year of his tenure. On the other hand the PERs of my subordinates were also reported by irrelevant quarters and they got promotions while I

am still serving on the same scale and post facing the sensitive issue of my PERs. One can easily imagine such an Environment.

- ii- I have made two appeals to the Secretary HED for help regarding the solution of my PERs' case (copies enclosed as Annexure J & K). After my second Appeal the ex-Director in violation of standing rules badly reported all my submitted PERs within the Directorate. He, in violation of rules, not only tried to use the Authorities of my Competent and Appointing Authorities by trying to change my Reporting and Countersignature Channels but also badly reported my PERs by irrelevant quarters, especially, at the time when the case of my PERs was in the Court of the Secretary HED due to my Appeal submitted on 25-6-2020 in the Office of the Secretary HED.
- iii- In response to his stance i.e provision of Statistical data, late and collective submission of PERs by Muneer Alam, I would like to say that at this stage when my appeal regarding my PERs' case is in the office of the Secretary HED seems to me has no legal grounds. So far as my Progress and Statistical data is concerned then it is stated that Statistical data is subject to various official orders of the Reporting Officer from time to time. In various correspondences I stated time and again that there is not a single order in my notice whose compliance is still awaited on my part. While the responsibility of late and collective submission of PERs rests on the shoulder of the ex-Director according to the PERs' rule of that time (Just two copies of my progress report and details related to the late submission of my PERs are attached as Annexure L & M.)
- iv- Unfortunately, after my appeal to the Secretary HED my PERs' case was moved in such a direction that it took more than two and a half years and is still not solved. I at that time submitted an application for correcting the direction of my PERs' case (copy enclosed as Annexure N).

In view of the above mentioned facts it is kindly requested that in order to save the time and energy, my PERs' case may kindly be moved in the light of my appeal to the Secretary HED and then the subsequent response of the ex-Director in this regard. It is also requested that a strong worded reminder, if possible, may be issued to the quarter concerned for the relevant comprehensive comments in response to the letter enclosed as Annexure A.

Thanking you in anticipation.

Yours Sincerely,

Muneer Alam
15-12-2022

(Muneer Alam)

Research Officer,

Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Copy in Advance along with all attached enclosures to:

- 1. The Secretary Higher Education, Archives & Libraries Department.

Muneer Alam
15-12-2022

Research Officer,

Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

15/12/22
15/12/22

Annexure K

The Secretary
Higher Education, Archives & Libraries
Government of Khyber Pakhtunkhwa Peshawar

Through:

PROPER CHANNEL

Received 18/7/23

Subject:

MODIFICATION AND MISSING OF DOCUMENTS RELATED TO MY APPLICATION IN THE OFFICE OF HED.

Respected Madam:

With due respect it is stated that I had submitted an application to the Director Archives & Libraries on 22-06-2023 (enclosure "A") along with two set of copies and attached enclosures for help to both the PS to Secretary HED and Deputy Secretary (litigation) HED. After properly receiving, the concerned officials had no objection over the deficiency of documents. But later on, I was informed through a written statement by the Section Officer of C-IV Section (copy enclosed as Annexure "B"), that the copy submitted to the PS to Secretary HED was not signed as well as with no annexure.

When I personally checked the other copy submitted to the Deputy Secretary (Litigation) HED, I came to know that it was marked to and received by the Section Officer (General) HED. The Section Officer (General) HED informed me verbally that he received just the unsigned copy of my application with no enclosure and accordingly he marked that unsigned copy to the Section Officer of C-IV Section.

The question arises that where the original copy along with two enclosures went after properly received by the High-ups of HED with no objection.

You are, therefore, kindly request for probing into the matter in the best public interest.

Thanking you in anticipation

Yours Sincerely,

Muneeb Alam,
Research Officer,
Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

Copy in advance for help to:-

1. The Secretary Higher Education, Archives & Libraries Department.
2. The Deputy Secretary (Admin), Higher Education, Archives & Libraries Department.
3. The Deputy Secretary (Litigation), Higher Education, Archives & Libraries Department.

Research Officer,
Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

18/7
Copy in advance for help to:-
18/7/23

Missing Documents Recovered.

I received from Mr. Waheedullah Afridi, computer operator of the Weeding Section, only one page photo-copy of the just front page of my application with no annexure and back side correspondence on it before 28-06-2023, who received it from a naib-qasid (Mr. Riaz) of Establishment Section of D&L and the written statement i.e may be returned to him as it is not signed, of the Section Officer of C-IV Section of HED, duly marked to C. O of C-IV Section, was recorded on it. In the meanwhile, no one informed me about the whereabouts of my original application which was properly signed on the back side. In this connection, after visiting the Office of the Section Officer of C-IV Section, met with the staff of A-S (Dev), staff of the Deputy-Secretary (Litigation), Deputy-Secretary (Admin), Section Officer (General) and Mr. Maazullah (senior clerk of the Directorate of A & L working in the C-IV Section of HED) and after finding no clue of my original application along with attached enclosures made a written complaint to the Secretary Higher Education Archives & Libraries on dated 18-07-2023. To my surprise, the original application along with attached enclosures was put before me on dated 31-07-2023 in the Establishment Section by Mr Irfan, Librarian II working as diary/dispatch clerk in the Establishment Section of the Directorate, for signature on the front page. Instead of signature, I just recorded my statement i.e Signed already on the back side please, on the bottom of the front page which I fluid/removed as it was not marked to me by my high-ups.

Muneer
03-08-2023

Muneer Alam,
Research Officer.

② Mr. Waheedullah,
Computer Operator of Weeding & Publication Section.

I handed over the above mentioned photocopy of letter to Mr. Muneer Alam, RO, received from Riaz Ahmed (Naib Qasid).
waheed 03/8/23

③ Mr. Irfan,
Librarian II
I told to Mr. Maaz to send back to the office concerned as the letter already signed by Mr. Muneer Alam Sec. on 03/8/23

(4)

Mr. Magzulla

Senior clerk of the Directorate working in the

The above mentioned letter was given to this to
Section officer (C-IV) section for signature of Mr. Muneer
and I handed-over it to Mr. Jafar Sub-11 and
still not received. *M Magzulla s/c*

(5)

From the above statements in
para 1, 2, 3 & 4, it is confirmed that a signed
letter, relates to me, without a covering letter from
C-IV section was received in the Establishment section
directly works under you, and then instead of
original letter, the photo-copy of the letter was
sent to W & P section through ~~the~~ Naib-Rasid of
Establishment section which was received by Mr. Wafedullah
in W & P section who handed over to me. Keeping
in mind the original letter is signed on the
back side while photo-copy is unsigned on
the front and nothing on the backside. please, update
me that your sub-ordinates, before doing ^{either} any info-
rmed you and got approval of you
or not?

(6) Mr. Mohibullah,
Incharge of Establishment section.

Muneer Alam
04-05-2023
Research Officer

Mohibullah returned note-part with it any *NT* Superintendent Mr Mo-
was in comments please.

(7) Director Archives & Libraries

Muneer
02-08-2023

Director Archives & Libraries

RO-I You are strictly warned to mend your behaviour while talking/working to your high-ups, and stop wasting time on pity issues. You are further directed to submit your progress report regarding the case, assigned to you by your reporting officer, i.e. DY. Dir.

(S)
9/8/2022

DY. Dir.

(S) Please follow the orders of Director A & L as mentioned without further wasteful, frivolous correspondence.

RO-I

8.23

The Director,
Archives & Libraries,
Govt. of Jharkhand, Patna

1201/2/10

4/8/23

369

Application for the release of
my conveyance and special allowance
w.e.f April 2023 (Arrival Report)

Madam,

With due respect it is stated
that I was on leave in the month
of March 2023 due to illness. I arrived
the office on 14-04-2023 and explained
the reason to the Director Archives & Libraries
with detail description about the my absence
for some days of the month of April 2023.
In response to the explanation given by the Director
Archives & Libraries. My conveyance and special
allowance are still stopped.

You are, therefore, kindly requested for the
release of the above mentioned allowances.

Thanking you in anticipation

Yours Sincerely,

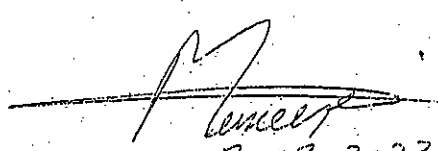
Murari Anand
Research Officer

Pr

Ro-I
Arrival report is
still pending.

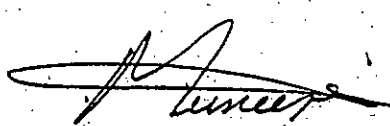
Q

On the basis of charge assumption and
surrender ^{report} conveyance and special allowance
released and stopped I still did not get the
responsibilities though, in written, requested
the Ex-Director as well as informed the office
the Secretary HED in connection to charge
responsibility. Under such environment, charge assumption
is not possible. Today,
it is not possible to sign in back-date from legal point
view, please.


07-08-2023
Muneer Alam
Research Officer

Director Archives & Libraries

On 16/08/2023 Mr. Mian Mudassir, diar,
and dispatch clerk, returned to me without any
written comments from the Director Archives & Libra
on this note-part. Please, if possible, check it.


16-08-2023

Mr. Muhibullah
Superintendent Establishment

As discussed with Director (A&L) for the release of convince allowance &
special allowance your arrival report is still awaited.



DIRECTORATE OF ARCHIVES & LIBRARIES
KHYBER PAKHTUNKHWA, PESHAWAR

Phone: - 091- 9210160 Website: www.kpdal.gov.pk
www.facebook.com/KParchivesandlibraries

No. 419 /S/A/DA Dated 11/3 March, 2022.

To.

- 1- Mr. Munir Alam, Research Officer, Directorate of Archives & Libraries, Peshawar.
- 2- Mr. Abdül Bari, Caretaker, Directorate of Archives & Libraries, Peshawar.

Subject: VACATION OF TWO ROOMS/OFFICES.


In compliance to the directions of Secretary, Higher Education Department, you are hereby directed to vacate your offices positively today i.e. 11-03-2022 under proper vacation report to the undersigned.

02- The officer at S.No. 01 is directed to shift to the office of Research Officer-I.

(Raheela Hafeez),
Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & Date even.

Copy forwarded to PS to Secretary, Higher Education Department, Khyber Pakhtunkhwa.


Director of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.



No. 629/3/1/DA Dated 07/ June, 2023

To

The Secretary to the Government of Khyber Pakhtunkhwa
 Higher Education Archives and Libraries Department.

Subject: **PROVISION OF TWO OFFICES IN DIRECTORATE OF ARCHIVES AND LIBRARIES**

In reference to the visit of Deputy Secretary (Lit), Deputy Secretary (Admin) and Section Officer (Gen) today on 07-06-2023 for the identification of two offices within the premises of the Directorate of Archives and Library. After a thorough visit of the building, the following two offices have been finally agreed and selected for official use of the Litigation Section, Higher Education Archives and Libraries Department.

1. Office adjacent to the Office of the Chief Librarian with front area for official staff.
2. Office adjacent to the Newspaper Section.

Research Officer-I is directed to shift to the office of Research Officer-III with immediate effect.

(Raheela Hafeez)
 Director of Archives & Libraries,
 Khyber Pakhtunkhwa, Peshawar.

Endst: No. & Date Even.

Copy forwarded to:

1. Deputy Secretary (Lit), Higher Education Archives and Libraries Department, Government of Khyber Pakhtunkhwa.
2. Deputy Secretary (Admin) Higher Education Archives and Libraries Department, Government of Khyber Pakhtunkhwa.

3. Research Officer-I & III for compliance

Director of Archives & Libraries,
 Khyber Pakhtunkhwa, Peshawar

[Handwritten Signature]
 8/6/23

please get proper approval from my competent authorities before vacating my office

[Handwritten Signature]
 28-06-2023

Annexure "M3"

Annexure "M3"



DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR

Phone: 091-9210100 Website: www.kpdal.gov.pk
www.facebook.com/KParchivesandlibraries

No. 677 /3/10/DA Dated 21st June, 2023.

To,

Mr. Muneer Alam, Research Officer,
Directorate of Archives & Libraries, Peshawar

Subject: EXPLANATION.

You were directed for vacating your office required for providing office accommodation to the high-ups of Higher Education Department vide No: 629/3/1/DA dated 07-06-2023. However, you utterly refused to do so on the pretext that the directions are not issued by your competent authority i.e. Chief Secretary. This insubordinate act on your part constitutes misconduct under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

02- In view of the above, you are directed to submit written explanation for your aforementioned insubordinate/irresponsible attitude by tomorrow i.e. 23-06-2023. You are further directed to pack up your personal belonging from your office and hand over keys to Caretaker by tomorrow, failing which your office will be fore-factly vacated and the entire responsibility thereof will rest upon you.

Muqarrab Khan
(Muqarrab Khan)
Deputy Director

Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. & Date even.

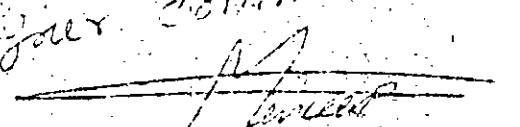
Copy forwarded to: -

1. The Deputy Secretary (Litigation), Higher Education, Archive & Libraries Department, Khyber Pakhtunkhwa.
2. The Director, Directorate of Archives & Libraries, Peshawar.
3. PS to Secretary, Higher Education, Archives & Libraries Department, Khyber Pakhtunkhwa.

Deputy Director
Directorate of Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.

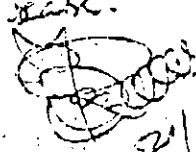
Annexure N^o

As per the verbal statement of Mr. Muhibullah, Superintendent Establishment, the Director Archives & Libraries has verbally instructed the Superintendent that in future no document would be received by the staff of the Establishment Section from Muneez Alam and Muneez Alam should personally submit his document directly before the Director Archives & Libraries. please find documents.


21-03-2023

Mr. Muhibullah
Superintendent Establishment.

Takeup the case with Director A&L himself. please.


21/03/2023

The Secretary to Govt. of Khyber Pakhtunkhwa,
Higher Education, Archives & Libraries Department

Through: - Proper Channel

Subject: - REQUEST FOR ASCERTAINMENT OF THE REPORTING OFFICER FOR ANNUAL PERs OF RESEARCH OFFICERS OF ARCHIVES WING.

Respected Sir,

With due respect it is stated that in the beginning this office was functioning as Central Record Office and later became Directorate of Archives. At that time on par with the world, Library was just a section like other sections of the Directorate of Archives. In 1992, this office was re-designated as Directorate of Archives & Libraries after construction of the present building. The service rules were accordingly changed, whereby, the post of Director Archives & Libraries was reserved for promotion amongst holders of the posts of Deputy Director and Chief Librarian on the basis of joint seniority. Previously, the Director promoted from Archives wing served till March, 2021, therefore, no issue existed regarding ascertainment of the Reporting Officer for the posts of Research Officers of Archives wing.

02- Now, according to the existing service rules, the Chief Librarian being the senior most is going to be promoted to the post of Director, Archives & Libraries. In such a situation the Reporting Officer for the PERs of the posts of Research Officers will be a question mark. Because the Chief Librarian due for promotion to the post of the Director, having library background i.e. Librarian, is irrelevant officer for initiating PERs of the Research Officers of Archives wing, as according to rules of PERS only senior relevant officer can be the Reporting Officer.

03- As far promotion rights of the present Chief Librarian is concerned the point pointed out that she was appointed in this Office as Librarian in BPS-16 then promoted to BPS-17. She also availed the upgradation facility in BPS-18, which was due only for librarians of colleges, as they had no chance of promotion in colleges. Moreover, as per Court decision, she and other librarians of this Directorate got back benefit of approximately Rs. 02.00 million on account of retrospective upgradation in BPS-17 with effect from the date of acquiring Master degree in Library & Information Science. Besides, she was also promoted to the post of Chief Librarian vacated in 2018.

04- In view of the above, the competent authority is requested to consider and resolve the issue regarding ascertainment of the Reporting Officer for PERs of the posts of Research Officers of Archives wing before issuing orders for filling up the vacant post of Director, Archives & Libraries please.

05- Thanking you in anticipate.

Yours Faithfully,

(Muneer Khan)

Research Officer,

Directorate of Archives & Libraries, Peshawar.

Endst: No. & Date Even.

Copy forwarded to Section Officer(C IV), Higher Education, Archives & Libraries Department.

To
The Director,
Archives & Libraries,
Government of Khyber Pakhtunkhwa, Peshawar.

Subject: Tempering Of Office Record, Scanned Versus Microfilmed Material In Respect Of Reliability, Plus, National Archives Act 1993 & Archival Material (Preservation And Export Control) Act, 1975.

Respected Madam,

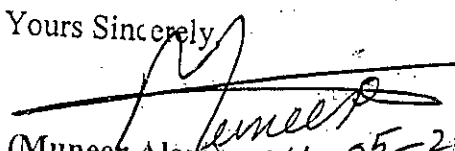
With due respect it is stated that there is difference between official meeting and official sitting and the details about the sitting of 26th July, 2021 are elaborated in the letter No. 1125/10/50/DA dated 23rd August, 2021, addressed to the Deputy Commissioner Peshawar. On the attendance sheet, someone first fluid/erased my remarks i.e. not attendant the full meeting, and then the tempered document was scanned. The above mentioned scanned tempered document of File no. 10/50 may need to be corrected.

2) - Being responsible for the administration of weeding section as per my Job Description, I would like to say that some record of Weeding and Publication section have been scanned during the tenure of the previous Director Archives & Libraries without consulting /bypassing me, like in other matters related to my post and career and roundabout same situation is still going on. Microfilm record is, comparatively, an authentic source and is beyond the approach of human expertise regarding tempering & authenticity while scanned material is not as such. Only, Primary (original) Source is consulted by both the Courts as well as the Research Scholars. Keeping in mind, it is the established practice throughout the World that Research Scholars, in order to save the original old Paper-Record from wearing & tearing by time and again touching the old paper-record, consult their relevant material in the Microfilmed Record, so need is to revive again the Microfilm- Section.

3) - As the custodian of the record, we must receive, preserve and retrieve the public record under the National Archival Act, of 1993, and the Archival Material (Preservation and export control) Act, of 1975. Facilitating a Government Agency/Department or Public means the provision of only the selected relevant material from the available Archival Record, with the proper approval of the Director of Archives & Libraries. Only notes taken by Research Scholar through pencil on a paper is allowed while photocopying, scanning etc. of the record is a violation of the Acts mentioned above. The current Scanning activity in the Research and Record Section with the proper facilitation of the Staff of the Directorate needs your immediate attention.

You are, therefore, kindly requested for considering the above mentioned facts.
Thanking you in anticipation.

Yours Sincerely


(Muneer Alam) 24-05-2023
Research Officer,

Directorate of Archives & Libraries,
Government of Khyber Pakhtunkhwa Peshawar.

Received on 24/5/23
