

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1052/2019

Date of Institution ... 06.08.2019
Date of Decision ... 07.09.2021

Dr. Hafiz Inayat Ullah Assistant Professor of Islamiyat Government
Degree College No.1 D.I.Khan.
... (Appellant)

VERSUS

Secretary Higher Education Department Khyber Pakhtunkhwa
Peshawar and 6 others.
... (Respondents)

Muhammad Zafar Tahir Kheli,
Advocate ... For appellant.

Riaz Khan Paindakheil,
Assistant Advocate General ... For respondents.

AHMAD SULTAN TAREEN ... CHAIRMAN
ROZINA REHMAN ... MEMBER (J)

JUDGMENT


ROZINA REHMAN, MEMBER (J): The relevant facts leading to filing
of instant appeal are that appellant was appointed as Lecturer in
Government Degree College for Boys Kulachi. He then applied for the
post of Assistant Professor of Islamiyat at Gomal University through


07/9/21

proper channel and after observing codal formalities, he was appointed as Assistant Professor of Islamiyat. He then filed his resignation to respondent No.4 and accordingly, he was relieved from the post. During his service at Gomal University, a letter was received by Registrar Gomal University in respect of not processing the appellant's resignation, he, therefore, filed an application for withdrawal of resignation which was accepted and he was posted at Government Degree College for Boys No.1. Disciplinary proceedings regarding non-processing of appellant's resignation were pending, therefore, promotion of the appellant was deferred. He then filed departmental appeal which was not responded to, hence, the present service appeal.

2. We have heard Muhammad Zafar Tahir Kheli Advocate for appellant and Riaz Khan Paindakheil learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

3. Muhammad Zafar Tahir Kheli Advocate, counsel appearing on behalf of appellant, inter-alia, contended that the appellant was not treated in accordance with law as he got No Objection Certificate from the respondents before applying to the vacant post advertised by the Gomal University. He submitted that as per directions of the Department, he submitted his resignation and also obtained clearance certificate where-after he joined the service in Gomal University. Learned counsel submitted that the pendency of inquiry is no ground to defer the case of a civil servant for promotion and that the inquiry was initiated just to fix

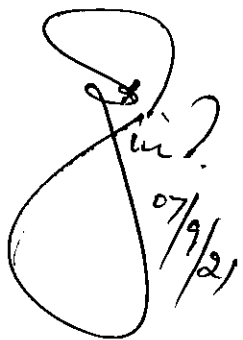

07/9/21

the responsibility for non-processing the resignation case of the appellant for more than three years which was not a solid ground for refusal to process the promotion case of the appellant. Reliance was placed on 2008 PLC (C.S) 551; 2016 PLC (C.S) 569 and 2000 SCMR 645.

4. As against that learned A.A.G submitted that the appellant was required to submit his resignation in the light of N.O.C and then he had to wait for the formal approval by the competent authority with regard to his resignation acceptance. He submitted that the appellant did not wait and also failed to submit formally his resignation to the competent authority instead malafidely submitted his resignation to the Principal of the concerned college, whereas he was Assistant Professor and the Principal concerned was not competent either to accept or reject his resignation or to relieve him on the basis of submission of resignation. He argued that the inquiry was conducted into the matter wherein it was proved that the issue of relieving was not processed as per law as the officer was required to get himself relieved after proper notification of the acceptance of his resignation from the competent authority and lastly he submitted that the case of promotion of the appellant was placed before P.S.B and on the basis of the very information/working paper prepared by Directorate of Higher Education, the P.S.B accordingly recommended the deferment of the promotion case of the appellant quite in accordance with the spirit of rules and that his deferment of promotion was also for want of P.E.Rs for certain period.


07/9/21

5. From the record, it is evident that appellant Dr. Hafiz Inayat Ullah was serving in the Higher Education Department Khyber Pakhtunkhwa and was posted as Assistant Professor Islamiyat in Government Degree College No.1 D.I.Khan. After obtaining proper departmental permission, he applied for the post of Assistant Professor in the Department of Islamic Studies and Arabic, Gomal University D.I.Khan. After his selection in the Gomal University, he rendered his resignation but his resignation was not processed and he started to perform his duties after his appointment in the Gomal University. The Registrar of Gomal University received a letter dated 15.02.2017 which reflected that his resignation had not been processed in time and was pending and he was still on the strength of Higher Education Department. He attended the Directorate of Higher Education and submitted his arrival/charge report in order to assume his duty as Assistant Professor Islamiyat in G.D.C No.1 D.I.Khan. As per notification dated 9th August, 2017, his request for withdrawal of his resignation was accepted by the competent authority and Directorate of Higher Education was requested to submit his posting proposal and accordingly he was posted/adjusted at Government Degree College No.1 D.I.Khan against the vacant post vide order dated 18th September, 2017. No doubt, a fact finding inquiry was initiated in order to fix responsibility on the delinquents for not processing the resignation case of the present appellant for a lapse of three years. Minutes of the meeting of P.S.B held on 19.04.2019 are available on file which shows that the Board recommended to defer his promotion as his P.E.R for the year 2012 was not available and the departmental inquiry was also pending against him.

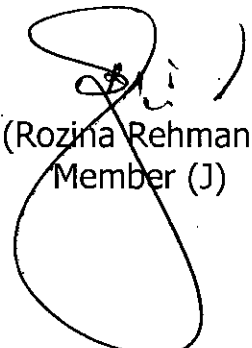

07/9/21

As discussed earlier that the appellant has now been properly adjusted and the inquiry has been finalized. As per record, P.E.R has also been sent to the concerned quarter. His case for promotion was deferred for the above-mentioned two reasons and those reasons are no more in field. Deferment is neither a punishment nor a final order; as and when the reason for deferment ceases to exist, the employee is to be promoted. There was no valid reason not to consider the appellant for promotion and mere fact that disciplinary proceedings were pending against him was not a sufficient ground for not considering the appellant for promotion.

6. For the foregoing, this appeal is allowed and appellant is held entitled for promotion from the date when he was deferred for the first time i.e. ~~23.09.2019~~ ^{19.04.2019}. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.
07.09.2021


(Ahmad Sultan Tareen)
Chairman


(Rozina Rehman)
Member (J)

Misc: Application No. 328/2021
in Appeal No. 1052/2019

08.11.2021

We have gone through the application dated 30.09.2011 as sent on behalf of appellant. Accordingly, it has been pointed out that the exact date when the applicant was first deferred for promotion by PSB is 19.04.2019 as detailed in the head note of the appeal. The same has been mentioned as 23.09.2019 in Para-06 of the judgment dated 07.09.2019. Therefore, request has been made for rectification of the date as 19.04.2019 and issuing certified copy of the judgment, obviously after necessary correction. This Tribunal within the meaning of Subsection-(02) of Section-7 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 is deemed as civil court under the Code of Civil Procedure, 1908. Section-152 C.P.C provides for amendment of the judgment, decree or orders. It provides that mistakes in judgments, decrees or orders or errors arisen therein from any accidental slip or omission may at any time be corrected by the court either of its own motion or on the application of any of the parties. In the present case, year is correct but the date and month have been written as 23.09.2019 instead of 19.04.2019 due to typographical mistake which is an accidental slip. Therefore, the case is fit for exercise of jurisdiction U/S 152 C.P.C as described before. The office is directed to make necessary correction in the judgment, wherever applicable, by substituting the date 23.09.2019 with 19.04.2019 in Para-06 of the judgment as well as in the Short order. This order alongwith application of appellant seeking said correction be placed on main file. The office is directed to issue certified copy and send the same in reply to the application of the applicant.


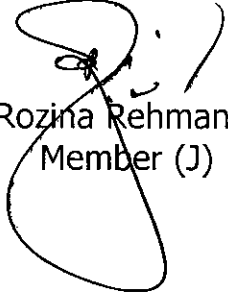


(Rozina Rehman)
Member (J)



Chairman

Service Appeal No. 1052/2019


S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	07.09.2021	<p><u>Present.</u></p> <p>Muhammad Zafar Tahir Kheli, ... For appellant Advocate</p> <p>Riaz Khan Paindakheil, ... For respondents Assistant Advocate General</p> <p>Vide detailed judgment of today placed on file, instant service appeal is allowed and appellant is held entitled for promotion from the date when he was deferred for the first time i.e. 23.09.2019 ^{19.04.2019}.</p> <p>Parties are left to bear their own costs. File be consigned to the record room.</p> <p><u>ANNOUNCED</u> 07.09.2021</p> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div style="text-align: center;">  (Ahmad Sultan Tareen) Chairman </div> <div style="text-align: center;">  (Rozina Rehman) Member (J) </div> </div>

07.2021

Appellant alongwith his counsel Mr. Muhammad Zafar Tahirkheli, Advocate, present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 07.09.2021.

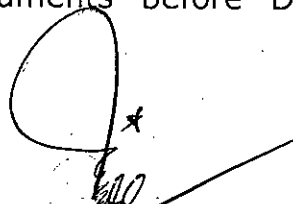

(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

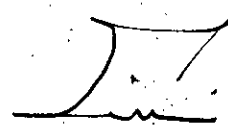

(SALAH-UD-DIN)
MEMBER (JUDICIAL)

24.03.2021

Appellant present. Mr. Ihsanullah, Lecturer also
Asif Masood Ali Shah, Deputy District Attorney
respondents present.

Appellant requested for adjournment on the ground that
his counsel is busy in the august High Court. Adjourned. To come
up for arguments before D.B at Camp Court D.I.Khan on
25.05.2021.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)
CAMP COURT D.I.KHAN



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

2021

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

We being Members of Larger Bench, remained busy in
hearing arguments in the appeals fixed before the Larger
Bench, therefore, arguments in the instant appeal could not
heard. Adjourned. To come up for arguments before the D.B
on 19.07.2021.

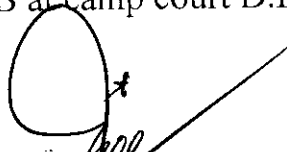

(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

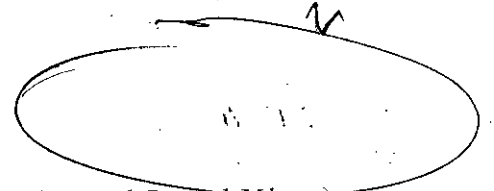
28.10.2020

Appellant is present in person. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Ihsan Ullah Khan, Lecturer for respondents is present.

Since the Members of the High Court as well as of the District Bar Association D.I.Khan are observing strike today, therefore, the case is adjourned to 21.12.2020 for arguments before D.B at camp court D.I.Khan.



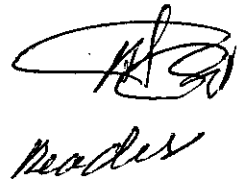
(Mian Muhammad)
Member(E)



(Muhammad Jamal Khan)
Member(J)
Camp Court D.I Khan

21-12-20

Order is hereby cancelled. Therefore the case is adjourned to 27-1-2021 for the same.



Moder

27-1-2021

Due to COVID 19, the case is adjourned to 24-3-2021 for the same.



25/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 27/4/2020 at Camp Court, D.I Khan

Reader

21/4/2020

Due to COVID-19 the case is adjourned. To come up for the same 23/9/2020 at Camp Court, D.I Khan


Reader

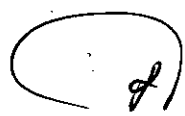
23.09.2020

Appellant in person present.

Mr. Usman Ghani, learned District Attorney alongwith Ihsanullah Lecturer for respondents present.


Former requests for adjournment as his counsel is busy before the Hon'ble High Court Bannu Bench. Adjourned. To come up for arguments on 28.10.2020 before D.B at Camp Court D.I Khan.


(Atiq-ur-Rehman Wazir)
Member (E)
Camp Court, D.I Khan

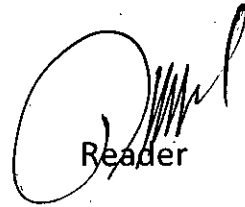

(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

24.02.2020

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith Mr. Afsar Khan, Lecturer on behalf of respondent No. 4 present. Written replies on behalf of respondents No. 1 to 3 & 5 to 7 have already been submitted. Representative of respondent No. 4 present in the court submitted application for the purpose of reliance on comments already submitted by respondent No. 1. The same is placed on record. To come up for rejoinder and arguments on 25.03.2020 before D.B at Camp Court D.I.Khan.



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan.

22/10/2019 Since tour to D.I.Khan has been cancelled .To come for the same on 25/11/2019.


Reader


25.11.2019

Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Ihsanullah Khan, Lecturer for the respondents present. Written reply on behalf of respondents not submitted. Representative of respondents seeks further adjournment. Case to come up for written reply/comments on 27.01.2020 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan


27.01.2020

Appellant in person and Mr. Usman Ghani, District Attorney alongwith Mr. Ihsanullah, Lecturer on behalf of respondents No. 1, 2, 3, 6 & 7 present. Representative of respondents No. 1, 2, 3, 6 & 7 submitted para-wise comments on behalf of respondents No. 1, 2, 3, 6 & 7. Written reply on behalf of respondent No. 5 has already been submitted while written reply on behalf of respondent No. 4 not submitted nor his representative is present, therefore, notices be issued to him respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Case to come up for written reply/comments on behalf of respondent No. 4 on 24.02.2020 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

28.08.2019

Counsel for the appellant present. Mr. Farhaj Sikandar, District Attorney alongwith Syed Abid Hussain, Associate Professor on behalf of respondents No. 1 to 4 & 6, 7 and Muhammad Rashid, Assistant Account Officer on behalf of respondent No. 5 present. Representative of respondent No. 5 submitted written reply. Written reply on behalf of respondents No. 1 to 4 & 6, 7 not submitted. Representative of the department requested for further adjournment. Case to come up for written reply/comments on behalf of respondents No. 1 to 4 & 6, 7 as well as reply/arguments on application for suspension of process of P.S.B on 24.09.2019 S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

24.09.2019

Appellant with counsel present. Written reply not submitted. Khushi Muhammad SO representative of the respondent department present and seeks time to furnish written reply/comments. Granted To come up for written reply/comments on 22.10.2019 before S.B at Camp Court D.I.Khan.


Member
Camp Court, D.I.Khan

SA No. 1052/2019-

19.08.2019

Counsel for the appellant present.

Contends that the case of appellant was deferred from promotion to the post of Associate Professor in the meeting of Provincial Selection Board held on 19.04.2019. The grounds recorded by the Board were in terms that P.E.R of the appellant for the year 2012 was not available and a departmental enquiry was pending against him. Referring to the various documents available on record it was argued that the enquiry was in fact pending against the Principal of Government Degree College No. 1 D.I.Khan who failed to forward the resignation of appellant to the competent authority for about three years. Even otherwise, the pendency of enquiry was not to be considered as bar for consideration for promotion of a civil servant, it was added.

In view of the available record and arguments of learned counsel instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 28.08.2019 before S.B at Camp Court, D.I.Khan.

Alongwith the appeal there is an application for suspension of process of P.S.B to be held on 20.08.2019. Notice of the application be also issued to the respondents for the date fixed.

19/8/19
Appellant Deposited
Security & Process Fee

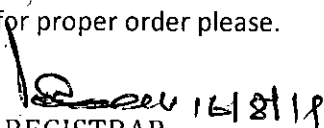

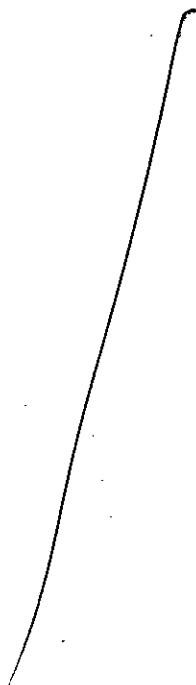
Chairman



Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1052/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/08/2019	<p>The appeal of Hafiz Inayat Ullah resubmitted today by Mr. Muhammad Anwar Awan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/8/2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>Admit note printed on Fresh page.</i></p> 

The appeal of Dr. Hafiz Inayatullah Assistant Professor of Islamiyat Government Degree College No. 1 D.I.Khan received today by i.e. on 06.08.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Annexures of the appeal may be flagged.
- 3- Address of respondent No.7 is incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- The authority to whom the departmental appeal was made/preferred has not been made/arrayed a party.
- 5- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1379 /S.T,

Dt. 06/8 /2019.

06/8/19
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Anwar Awan Adv.
Supreme Court of Pakistan at
Dera Ismail Khan.

Respected Sir,

All the annexure were attested & flagged and address of respondent No 7 is corrected/completed. The departmental appeal is preferred to respondent No 6 along with copies to respondent No 1 & 2. Two more sets are also attached.

Anwar Adv.

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR
CAMP AT D.I.KHAN.

Appeal no. 1052 of 2019.

Hafiz Inayat Ullah

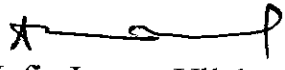
VERSUS

Govt; Of KPK and others

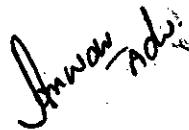
INDEX

No.	Particulars	Annexure	Pages
1	Appeal		1-5
2	Copy appointment order	A	6-7
3	Copy of the letter dated 19-09-2012	B	8
4	Copy of appointment order dated 23-04-201	C	9
5	Copy of letter dated 15-05-2014	D	10
6	Copy of application for resignation	E	11-15
7	Copy of relieving order dated 28-04-2014	F	16
8	Copy of letter dated 15-02-2017	G	17
9	Copy of application	H	18-19
10	Copy of letters	I	20-23
11	Copy of Copy of letters	J	24-27
12	Copy of application	K	28-31
13	Copy of letter dated	L	32-35
14	Copy of Letter 19-04-2019	M	36-38
15	Court Fee	N	
16	Wakalat Nama	O	39

Your humble Petitioner


Hafiz Inayat Ullah

Dated; 03-08-2019


Mohammad Anwar Awan
Advocate Supreme Court.

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR
CAMP AT D.I.KHAN.

Appeal no. 1059/ of 2019.

Dr Hafiz Inayat Ullah Assistant Professor of Islamiyat
Government Degree College No-1 D.I.Khan.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1150

Dated 06-8-2019

VERSUS

- ✓ 1. Secretary Higher Education Department Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education Department Khyber Pakhtunkhwa Peshawar.
3. Deputy Director (Establishment) Higher Education Department Khyber Pakhtunkhwa Peshawar.
4. Principal Government Degree College for Boys Dera Ismail Khan.
5. Account Officer Kechary Road Dera Ismail Khan.
6. Government of Khyber Pakhtunkhwa through Chief secretary Peshawar.
- 7. Provincial Selection Board Peshawar. *Through its Chairman/Chief*
KPK PESHAWAR.

APPEAL UNDER SECTION 4 OF KP SERVICE
TRIBUNAL ACT 1974 AGAINST ILLEGAL AND
MALAFIDE ORDER DATED 19-04-2019 ACCORDING
TO WHICH MY PROMOTION CASE WAS DEFERRED.

Filed to-day

Registrar

That the brief facts of the case are as under:

That the petitioner is appointed as Lecturer in Government Degree College for Boys Kulachi vide order dated 05-12-1998. Copy of appointment order is Annexure A.

That appellant applied for No objection certificate for some vacant advertised posts of Assistant Professor of Islamiyat (B-19) at Gomal University which was granted vide letter dated 19-09-2012. Copy of the letter dated 19-09-2012 is annexure B.

Re-submitted to-day
and filed.

Registrar 16/8/19

That after observing codal formalities, the appellant was appointed as Assistant Professor of Islamiyat vide order dated 23-04-2014. so appellant file his resignation to respondent No-4 and was relieved from the post vide order dated 28-04-2019. Copies of appointment order dated 23-04-2014, letter dated 15-05-2014, application for resignation and relieving order dated 28-04-2014 are Annexure C, D, E & F.

4. That during my service at Gomal University Dera Ismail Khan, a copy letter dated 15-02-2017 was received to Registrar Gomal University which reflects that appellant resignation was not processed by respondent No-4 and which is still pending. Copy of letter dated 15-02-2017 is annexure G.
5. That after issuance of above said letter the appellant filed an application for withdrawal of resignation which was accepted and appellant was posted at Government Degree College for Boys No-1 and appellant join his duty. Copies of application & letters are Annexure H & I.
6. That the respondent No-1 initiated disciplinary proceeding regarding non processing of appellant resignation case by appointing Irfan Ullah Professor Government Degree College Bunner. The inquiry office proposed that the stint w.e.f 23-04-2014 to 08-05-2017 may be regarded as deputation period. Copy of letters is Annexure J.
7. That appellant filed an application for condoning the above said period from the service of appellant which was processed by respondents. Copy of application is Annexure K.
8. That respondent on the basis of pendency of inquiry, deferred the case of appellant from promotion for the Associate Professor. Copy of letter dated 19-04-2019 is Annexure L.
9. That on getting knowledge, the appellant filed departmental appeal which was not decided by competent authority. Copy of Appeal is Annexure M.
10. That feeling aggrieved from above said action petitioner is constrained to approaches this honorable court on the following amongst other:


GROUND:

1. That the appellants are not treated in accordance with law and the actions of the respondents are malafide besides being discriminatory and harsh.

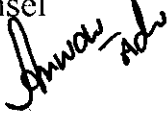
2. That the appellant before applying to the vacant posts advertised by Gomal University, got No objection certificate from his respondents and according to the direction of department, submit his resignation and also obtained clearance certificate and thereafter join the service in Gomal University.
3. That it is settled law that pendency of inquiry before any civil servant is no ground to deferred his case for promotion but respondents do so and case of appellant was not sent to Promotion selection board.
4. It is evident from record that fact inquiry was initiated to fix the responsibility for not processing the resignation case of appellant for more than three years which is no ground for refusal to process the promotion case because there is no charge is levelled against the appellant.

In view of the above, It is, therefore, most respectfully prayed that on acceptance this appeal this honorable court may pleased to declare that order dated 19-04-2019 as illegal, void, without lawful authority and of no legal effect and respondents may please be directed to process the case of appellant for promotion for the post of Associate Professor and may kindly promote the appellant on said post in accordance with law with all back and future benefits.

YOUR HUMBLE APPELLANT

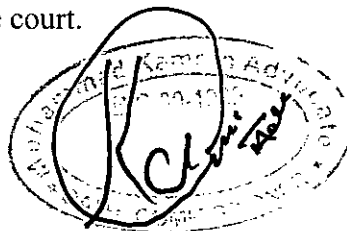

Hafiz Inayat Ullah
Through Counsel


Dated; 03-08-2019.


Muhammad Anwar Awan
Advocate Supreme Court

AFFIDAVIT

Hafiz Inayat Ullah do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.




Deponent.

12101-0909919-9

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR
CAMP AT D.I.KHAN.**

Appeal no..... of 2019.

Hafiz Inayat Ullah

VERSUS

Govt; Of KPK and others

Service Appeal

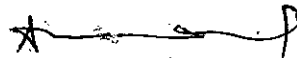
**Application for suspension of process of Provincial Selection Board
For Promotion for the posts of Associate Professor**

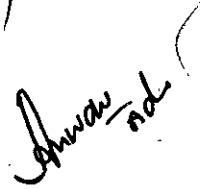
Respected Sir,

1. That service appeal along with application is filling today.
2. The petitioner case is deferred from promotion for the post of Associate Professor by the Provincial Selection Board on the ground that the inquiry is pending against the appellant. It is evident from the record that no disciplinary proceeding is pending against appellant rather against the Principal Government Degree College No-1 Dera Ismail Khan for non-processing the resignation of appellant so appellant has a prima facie. The appellant shall suffer great loss if provincial selection Board will not consider his case for promotion and conducted selection Board meeting held on 20-08-2019.
3. That appellant will face inconvenience if the selection process will be completed without appellant.
4. That this Hon'ble court has vast jurisdiction to accept this application.

It is therefore requested that my kindly accepted this application and may kindly suspend the process of Provincial Selection board till decision of Appeal. It is further prayed in appropriate case may kindly direct the respondent to consider the appellant for promotion.

YOUR HUMBLE APPELLANT


Hafiz Inayat Ullah
Through Counsel

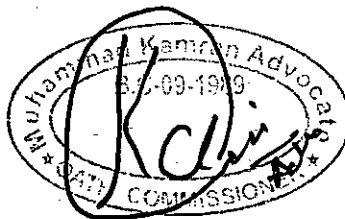


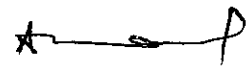
Dated; 03-08-2019.

Mohammad Anwar Awan
Advocate Supreme Court

AFFIDAVIT

Hafiz Inayat Ullah do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.




Deponent.

(A)

GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT.

Dated Peshawar, the 5-12-1998.

(6)

NOTIFICATION.

No.SO(C)II-1/96-VI:- Consequent upon the recommendations of the NWFP Public Service Commission and consent of the NWFP Finance Department through circular letter No.BI/5-8/98-99/F.D., dated 31-8-1998, the Governor, N.W.F.P., is pleased to appoint the following candidates as Officiating Lecturers (BPS-17) in various subjects at the Government Colleges mentioned against each from the date of their taking over charge subject to the conditions mentioned below :-

<u>S.No.</u>	<u>Name of Candidates with father's name.</u>	<u>Place of Posting.</u>	<u>Remarks.</u>
1.	Mr.Rashid Iqbal, S/O Arif Gul, Persian Department, University of Peshawar.	Lect; in Persian, G.C.Khar(Bajaur).	Against the vacant post,
2.	Mr.Mohammad Hassan, S/O Aziz-ur-Rehman, Moh; Jander Khel, P.O. Dallo Khel, Teh; and Distt; Lakki Marwat.	Lect; in Pol;Science, G.C., Thall.	-do-
3.	Mr.Fazal Rahim Khan, S/O Abdul Jalil Khan, Vill; & P.O. Tarnab Form, Teh; & Distt; Peshawar.	Lect; in Botany, G.C. Oghi(Mansehra).	-do-
4.	Mr.Mohammed Yousaf, S/O Sharif Zada, Vill; & P.O. Tindodag, Teh; Saidu Sharif (Swat).	Lect; in Chemistry, G.C., Chakessar.	-do-
5.	Mr.Faheem Ashraf, S/O Mohammad Ashraf, Vill; Mologa, P.O. Oghi, District Mansehra.	Lect; in Physics, G.C., Chazni Khel.	-do-
6.	Mr.Salman Khan, S/O Haji Hakam Khan, C/O Fazli Hussain.Medical Store (Salman Khan), P.O. Shabqadar, Teh; & Distt; Peshawar..	Lect; in Physics, G.C.,Khar(Bajaur).	-do-
7.	Mr.Ashfaq Ahmad, S/O Zahidul, Moh; Ali Sher Khel, Vill; & P.O. Sheikh Jana, Teh;& Distt;Swabi.	Lect; in Physics, G.C.Toru(Mardan).	-do-
8.	Mr.Riaz Hussain, S/O Mohammad Humayun, Vill; & P.O. Dhodial, Moh; Malkal, (Mansehra).	Lect; in Pak;Studies, G.C..Oghi(Mansehra).	-do-
9.	Mr.Jehan Bahadar, S/O Ghulam Badshah, Distt; and Teh; Dir, P.O. Dir Proper, C/O Jehanzeb through Allauddin Karyana & Ghalla Merchant, Mian Bazaar, Dir.	Lect; in English, G.C.,Lahor(Swabi).	-do-
10.	Mr.Yousaf Jehanzeb, S/O Abdul Rehman Khan, C-2/162, St;No.7, Phase-5, Hayatabad, Peshawar.	Lect; in English, G.C., Thall.	-do-

(Contd;.....P/2)

Attested
Amir

11.	Mr.Mohammad Shakeel, S/O Malik Mohammad Shafi, Basti Ustarana North, Near Maulvi Shopkeeper, House No:M/031, Teh; & Distt; D.I.Khan.	Lect; in English, G.C., Paharpur.	Against the vacant post.
12.	Mr.Zaka-ur-Rashid, S/O Sufi Abdul Rashid, Department of Urdu, Govt; College No.1, Abbottabad.	Lect; in English, G.C., Havelian.	-do-
13.	Mr.Noor Alam Khan, S/O Koid Aman, Niaz Medical Store, Near Public Park, Distt; Tank.	Lect; in English, G.C., Tank.	-do-
14.	Mr.Badi-uz-Zaman Shah S/O Qamar Zaman Shah, Vill; Goveraka Syed Khel, P.O. Hazni Khel, Teh; & Distt; Lekki Marwat.	Lect; in English, G.C., D.A.Khel.	-do-
15.	Mr.Mohammad Mosaud Khan, S/O Serwar Din, Village & P.O. Dargai (Charsadda).	Lect; in English, G.C., Lanor(Swabi).	-do-
16.	Mr.Ziaullah Shams, S/O Shamsul Arafeen, Shams Medicose, Near Civil Hospital, Kernal, Swat.	Lect; in English, G.C., Daggar.	-do-
17.	Hafiz Habib-ur-Rehman, S/O Khial Badin, Near U.B.L.Kerak, Main Bazar, Kerak.	Lect; in Islamiyat, G.C., Parachinar.	-do-
18.	Hafiz Inayat Ullah, S/O Haji Sher Mohammad, Bismillah Variety House Bazarkalan, near Chogalia, Dera Ismail Khan.	Lect; in Islamiyat, G.C., Kulachi.	-do-
19.	Raja Mohammad Riáz-ur- Rehman S/O Mohammad Younas, 1372 Sector-I, Khalabat Township, Haripur 22800.	Lect; in Urdu, G.C., Oghi(Mansera).	-do-
20.	Mr.Sonail Ahmad S/O Irshad Ahmad Shamsi, House No.200/245, Havelian Street, Gulberg No.2, Peshawar.	Lect; in Urdu, G.C., Daggar.	-do-
21.	Mr.Javed Khan Afridi, S/O Salim Khan, C/O Dr.Salim, P.O. Dara Bazar, District Kohat.	Lect; in Urdu, G.C., B.D.Shah.	-do-
22.	Mr.Imran S/O Tajul Maluk, C/O Khalid General Store, Mohallah Tesbi Garam, I/S Lahori Gate, Peshawar City.	Lect; in Urdu, G.C., Alpuri.	-do-
23.	Syed Attaullah Shah, S/O Syed Samiullah Shah, Assistant, WPP Public Service Commission, Peshawar.	Lect; in Urdu, G.C., Mansera.	-do-

2- Consequent upon the above appointments, the following adjustments/transfers are hereby ordered in the public interest with immediate effect :-

S.No.	Name of Officer.	Transfer to:	Remarks.
1.	Mr.Fazlullah, A/P pf Urdu, Govt; College, Alpuri.	G.C., Matta.	Against the vacant post.

- 7. They will be on probation initially for two years extendable upto three years.
- 8. They will be governed by such rules and regulation as may be issued from time to time by the Government for the category of Government servants to which they belong.
- 9. A declaration of assets should be obtained from them if not already done and kept on record.

SECRETARY TO GOVT:OF NWFP,
EDUCATION DEPT: PESHAWAR.

Endst:No.SO(C)II-1/96-VI, Dated Peshawar, the 5-12-1998.

Copy for information & n/action to :-

- 1. The Director of Education (Colleges) NWFP, Peshawar w/r to his letter No.12930 dated 30-11-1998. Original medical certificates of the above 23 candidates are enclosed herewith.
- 2. The Accountant General, NWFP, Peshawar.
- 3. The District/Agency Accounts Officers concerned.
- 4. The Principals concerned.
- 5. The Director Recruitment, NWFP Public Service Commission, Peshawar w/r to his letters No.14300 dt; 20-7-98, No.14301 dt; 20-7-98, No.14302 dt; 20-7-98, No.14303 dt; 20-7-98, No.14304 dt; 20-7-98, No.14307 dt; 20-7-98, No.17369 dt; 14-9-98, No.17370 dt; 14-9-98 and No.17463 dt; 18-9-98.
- 6. The Budget Officer-I, Govt; of NWFP, Finance Department, Peshawar w/r to his circular letter No.BI/5-8/98-99/FD, dt; 31-8-1998.
- 7. The Manager, Govt; Printing Press, NWFP, Peshawar.
- 8. The Candidates concerned. ^{is} (Through Registered cover).
- 9. The Officers concerned.

(FARRUKH IQBAL)
SECTION OFFICER(COLLEGES)

Encls:(As Above)

Attested
Shamir

2.	Mr. Ghansul Islam, A/P of Eng; G.C. Lahor (Swabi).	G.C. Nowshera.	Against the vacant post.
3.	Mr. Mohammad Siddiq, Lect; in Eng; CC, Havelian.	G.C., Bannu.	-do-
4.	Mr. Shad Ali Khan, Lect; in Urdu, CC, Daggar.	G.C., Karak.	-do-
5.	Mr. Shahoaz Faisal, Lect; in Urdu, CC, B.D. Shah.	CC, D.A. Khel.	-do-
6.	Mr. Ishtiaq Ahmad, Lect; in Eng; CC, Lahor (Swabi).	CC, Haripur.	-do-
7.	Mr. Abdul Sabooh, Lect; in Isl; CC, Parachinar.	CC, Haripur.	Vice S.No.8.
8.	Mr. Shujaat Ali Shah, Lect; in Isl; CC, Haripur.	CC, Mansehra.	Against the vacant post.
9.	Mr. Masood Gul; Lect; in Pol; cc; CC, Tangi. G.C., Oghi.		-do-
10.	Mr. Mohammad Rafiq, Lect; in Eng; BSSC, Peshawar.	CC, Miranshah.	-do-
11.	Mr. Mohammad Sadiq, Lect; in Physics, CC, Ghazni Khel.	CC, Bannu.	-do-
12.	Mr. Noor Mohammad, A/P of Pol; Sc; CC, Khairabad (Mardan).	CC, Agra.	-do-
13.	Mr. Mohammad Ali, Lect; in Pol; Sc; G.C., Tangi.	CC, Khairabad (Mardan).	-do-
14.	Mr. Dilawar Khan, Lect; in Physics, CC, Khar.	CC, Sabir Abad.	-do-
15.	Mr. Shafi-ur-Rehman, Lect; in Maths; CC, Karak.	CC, Sabir Abad.	-do-
16.	Mr. Khalid Sohail, Lect; in Urdu, CC, Khar.	CC, Tangi.	-do-
17.	Mr. Mir Baz Khan, Lect; in Hist/Civ; CC No.1, D.I. Khan (Under transfer to CC, Ghazi).	CC, Paharpur.	-do-
18.	Mr. Izkharullah, Lect; in Chem; GJC, Saidu Sharif, Swat. (Under transfer to G.C., Chakessar).	CC No.2, Abbottabad.	-do-
19.	Mr. Sakhi Sarwar, Lect; in Eng; CC, Thall.	CC, Karak.	-do-

Note:- No TA/DA/TG will be allowed to the officers at S.No.1 to 19 in para-2 of the notification.

TERMS & CONDITIONS :-

1. The appointments of the candidates mentioned at para-1 above is subject to the condition that they are the domicile of NWFP.
2. Their inter-se-seniority will be fixed according to the order of merit assigned by the NWFP Public Service Commission.
3. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice their one month's pay/allowances, if any, shall be forfeited to Government.
4. No TA/DA etc; is allowed on their first appointment as Offtg; Lecturers.
5. The candidates should join their post within 30 days of the issue of this notification. The Director of Education (Colleges) NWFP, Peshawar should furnish a certificate to the effect that the candidates have joined the post or otherwise after one month of the issue of this notification.
6. Charge reports in duplicate should be submitted to all concerned.

(B)

(8)

DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone # 091-9211025, 091-9210242, Fax # 091-9210242

No. /A-12/CA-V/Estt/Branch/Dr.Hafiz Inayatullah/Islamic Studies

Dated Peshawar, 19/08/2012.

To

The Registrar,
Gomal University,
D.I.Khan.

Subject: - DEPARTMENTAL PERMISSION.

Memo.

I am directed to refer to the subject noted above and to state that this Directorate has no objection upon applying to the post of Assistant Professor of Islamiyat (B-19) at Gomal University, DIKhan in respect of Dr.Hafiz Inayatullah Assistant Professor of Islamiyat Govt.Degree College No.1 DIKhan.

DY; DIRECTOR (ESTABLISHMENT)

Endst.No. 19701

Copy of the above is forwarded to the Principal Govt.Degree College No.1 DIKhan w/r to his letter No.831 dated 31.08.2012 with the remarks that in case of his selection against the post applied for, he will have to resign from the present post and his lien will not be retained in this Department.

DY; DIRECTOR (ESTABLISHMENT)

*By Clerk
Inform the officer
concerned about the
outcome.*

28-09-12

*Noted Please
2-10-2012*

G.O. No. 1 D.I. Khan
DIARY No. 405
DATED 29/09/12

*Attested
Jinnah Ad*

DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA,

KHYBER ROAD PESHAWAR

No. 10898 / C.A-1/ Estt: Branch/ A-12/ Hafiz Inayatullah/Islamiyat

Dated Peshawar the 15/5/2014

(D)

(10)

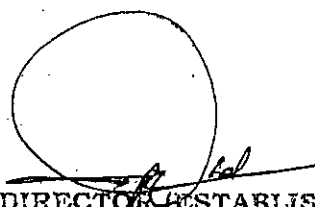
The Principal
Govt; Degree College, No. 1 D.I.Khan.

SUBJECT

SELECTION OF DR. HAFIZ INAYATULLAH ASSISTANT
PROFESSOR OF ISLAMIYAT AT THE DEPARTMENT OF
ISLAMIC STUDIES AND ARABIC GOMAL UNIVERSITY
D.I.KHAN.

I am directed to refer to your letter No. 946 dated 03.05.2014
that this office granted NOC for employment in Gomal University D.I.Khan in
respect of Dr. Hafiz Inayatullah Assistant Professor of Islamiyat of your College
subject to the condition that in case of his selection against the post applied
for, he will have to resign from the present post in the Department and his lien
will not be retained vide Endst. No. 19701 dated 19.09.2012. The officer
concerned may be advised to submit his resignation and deposit one month
pay in lieu of prior notice in Govt; Treasury and send original challan alongwith
Non involvement Certificate/ Clearance Certificate to this office for further
processing the case.

*H/C
Direct the officer
concerned to do the
needful as explained.
23-05-2014*


DY: DIRECTOR (ESTABLISHMENT)
HR

G.C. No. 1 D.I. Khan
DIARY No. 83
DATED 26/05/14

*Noted
30/5/14*

*Attested
Amir Ad*



GOMAL UNIVERSITY DERA ISMAIL KHAN

Establishment Section

(C)

OFFICE ORDER

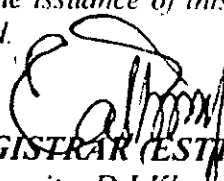
On the recommendations of Gomal University Selection Board held on 5th & 6th April, 2014 and approval of the Gomal University Syndicate taken in its 90th meeting held on 07-4-2014 (Under Item No-11), the following candidates are appointed as Assistant Professor (BPS-19) in order of merit in the Department of Islamic Studies and Arabic Gomal University with the terms and conditions as mentioned here-in- after with effect from the date of meeting of Syndicate i.e. 07-4-2014 OR from date of their joining:-

(9)

S. No.	Name of appointee with permanent address	
1.	Dr. Qari Wahid Bakhsh S/O Ghulam Sarwar Near Masjid Al-Waheed Zafar Abad Colony D.I.Khan	Appointed against clear vacant post
2.	Dr. Hafiz Inayatullah S/O Sher Muhammad Mohallah Mujahid Nagar Near Gulzar Masjid Street Amjad Hayat, D.I.Khan City	Appointed against clear vacant post
3.	Muhammad Wajeel-ud-Din Nouman S/O Dr. Waheed-ud-Din, Mohallah Salah Muhammad, Street Moulana Ala-ud-Din Sahib, D.I.Khan City	Appointed against clear vacant post
4.	Dr. Manzoor Ahmad S/O Mian Ahmad Village & P/O Sabhral Tehsil & Distt: Khushab	Appointed against clear vacant post

Terms and Conditions

- Their appointment is subject to Medical Fitness.
- They will be governed by such rules and orders relating to Leave, TA/DA, Medical Attendance and other Allowances etc. as may be prescribed by the University from time to time for the categories of University employees of their status.
- They will be on probation for a period of one year.
- In case they wish to resign at any time during probation they will have to give two months' notice or in lieu thereof deposit an amount equivalent to their two months' pay with University but after the completion of probation the time period of notice will be three months.
- They are directed to join their duties within fifteen days from the issuance of this office order failing which their appointment order shall stand cancelled.


DEPUTY REGISTRAR (ESTT:)
Gomal University, D.I.Khan

No. 176-187/GU/Rec.

Dated: 23/04/2014

Copy forward to:-

1. The Secretary to Vice Chancellor, Gomal University.
2. The Registrar, Gomal University.
3. The Director Finance, Gomal University.
4. The Dean Faculty of Arts Gomal University.
5. The Chairman Department of Islamic Studies & Arabic.
6. The RAD (Audit), Gomal University.
7. The Pay Officer, Gomal University.
8. All Persons Concerned.
9. The supdt: I & III Estt: Section (P/Files).


DEPUTY REGISTRAR (ESTT:)
Gomal University, D.I.Khan

Attested
Anwar Adh

To, The Director of Higher Education,
Directorate of Higher Education,
Khyber Road, Peshawar.

Subject: 1. RESIGNATION FROM POST
2. TRANSFER OF SERVICE BENEFITS TO GOMAL
UNIVERSITY, D.I.KHAN

Respected Sir,

1. It is humbly submitted that I applied for the post of Assistant Professor at the Department of Islamic Studies and Arabic Gomal University D.I. Khan after seeking Departmental permission vide notification No. 1970/A-12/CA-v/Estt: Branch/Dr Hafiz InayatUllah/ Islamic Studies, Dated: Peshawar the 19-09-2012. I appeared before the Selection Board of Gomal University on 05-04-2014 and got selected as an Assistant Professor in the Department of Islamic studies and Arabic Gomal University D.I. Khan.

In the light of the above mentioned selection on regular basis as an Assistant professor in the Department of Islamic studies and Arabic Gomal University D.I. Khan, I, therefore, tender my resignation from the post w.e.f 07-04-2014.


2. I also humbly request your honor to grant permission for the transferring of the following rights/benefits of my services to Gomal University D.I. Khan, as I have been selected there as an Assistant professor Gomal University D.I. Khan on regular basis:

- i. Pension Benefits
- ii. G.P. Fund Transfer
- iii. Leave Account
- iv. Leave salary

I shall be highly obliged for your sympathetic consideration of my case.

Yours Obediently,

Dated: 07-04-2014



(Dr.Hafiz Inayatullah)

Assistant Professor Islamiyat,
Govt. Degree College No.1, D.I.Khan

Attested
Jhwar Ad

To

12

The secretary,
Higher Education Department
Govt. of KPK Peshawar.

Through: . PROPER CHANNEL
Subject: Request for relieving and Grant of lien.
R/Madam;

It is stated that I, Dr. Hafiz Inayatullah Assistant Professor of Islamic Studies, GDC No. 1 (Male) college DIKhan, have been selected ^{as} an Assistant Professor (BPS- 19) in the Department of Islamic studies, Arabic and research at Gomal university DIKhan, after the proper recommendation of selection Board, syndicate and in charge recruitment and litigation section Gomal University DIKhan, vide his office No.176-187/GU/Res.Dated: 23/04/2014 (copy attached).

I have applied for the post of Assistant professor through proper channel and selected with the condition that my services will be on probation for a period of one year.

I ~~am~~ humbly request your good self please to relieve me from Govt. Duties w.e. f Dated: 07-04-2014 Fore Noon with the granted of lien in Higher Education Department. I will be grateful to you for this act of kindness.

Thanks

Yours obediently

Dr. Hafiz Inayatullah
Assistant Professor
Deptt: of Islamic Studies,
Arabic and Research
Gomal University DIKhan

OFFICE OF THE PRINCIPAL GOVT. DEGREE COLLEGE NO. 1(MALE) DIKHAN.

Endst: No. 907

dated 24/04/2014

Submitted in original along with copies of clearance/non involvement certificate and copy of charge to the Director Education Department KPK Peshawar with the remarks to consider the application request favorably according to the Govt. rules please.

Attested
Anwar-ud

Principal
G.D.C. No.1 D.I.Kh

CHALAN NO.

13

CENTREL

To be filled in by the remitter			To be filled in by the Departmental officer of the treasury		
By whom tendered	Name of designation & address of the person on whose behalf money is paid	Full particulars of The remittances & of authority(if any)	Amount	Head of account	Order to the Bank

Name RECOVERY OF ONE MONTH
 BASIC PAY 36500/- CO-2814 Other
 FROM HAFIZ INAYAT ULLAH
 EX-ASSISTANT PROFESSOR

[Signature]
 PRINCIPAL,
 G.D.C. No.1 D.I.K.

3
[Signature]
 31-12-2018
 Principal
 Govt. Degree College No.1
 Dera Ismail Khan

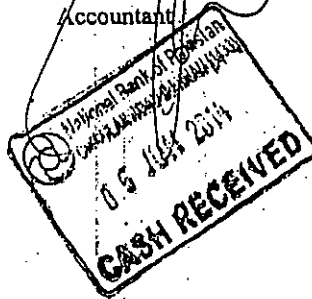
Total (A) Rs. 36500/-

b) (in words) Rupees Thirty Six thousand five hundred only

Received payment *[Signature]* Date

Treasure *[Signature]* Accountant

Treasury officer
Manager



Attested
[Signature]

NON-INVOLEMENT CERTIFICATE

It is certified that Mr.Dr.Hfiz Inayatullah Assistant Professor of this college is not involved in any Departmental/Police/Anti-Corruption case during his service in Education Department.

Dated 24-04-2014.



Principal

Principal




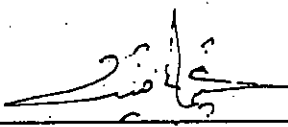

G.D.Govt. College # 1 D.I.Khan.

Attestation
Signature

OFFICE OF THE PRINCIPAL GOVT: COLLEGE NO-1, D.I.KHAN

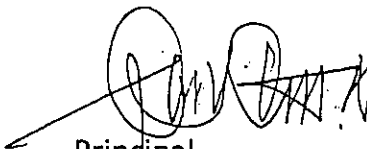
CLEARANCE CERTIFICATE

Certified that nothing is outstanding against Mr. Dr. Hafiz Inayatullah Assistant Professor of Islamic studies of this college.

- 1- Head of the Department 
- 2- Librarian  Librarian
Govt Degree College
Dera Ismail Khan
- 3- Accountant 
- 4- S.S.K. (Incharge college property) 
- 5- Incharge Sports 

Dated: 24/04/2014

*Attested
Inayatullah*

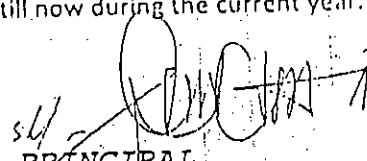

Principal
Govt. D.I.Khan
G.D.C. No.1 D.I.K

RELIEVING ORDER

Reference Deputy Director Establishment Directorate of Higher Education, Govt. of KPK Peshawar office No. 19701/A-12/CA-V/Estt; Branch/ Dr. Hafiz Inayatullah/ Islamic Studies Dated, Peshawar, the 19/09/2012, regarding the Departmental Permission in case of selection at Gomal University DIKhan as Assistant Professor in Islamic Studies BPS-19 in respect of Dr. Hafiz Inayatullah Assistant Professor of this college.

The officer concerned is here by relieved from Govt. Duties from 07-04-2014 Fore Noon and he is directed to report to the in charge recruitment and litigation Gomal University D.I.Khan for further duties.

The officer concerned has not availed casual leave up till now during the current year.



PRINCIPAL
Principal DIKhan
G.D.C. No. 1 D.I.KI

Endst: No. 132-38

Dated. 28/05/2014

Copy of the above is forwarded for information and further necessary action to the:

1. PA to Secretary to Govt. Higher Education Department Govt. of Khyber Pakhtunkhwa Peshawar.
2. Secretary to Vice Chancellor Gomal University D.I.Khan.
3. Director of Higher Education Khyber Pakhtunkhwa Peshawar for information.
4. In charge, recruitment and litigation section Gomal University D.I.Khan.
5. District Account Officer D.I.Khan
6. Officer Concerned.
7. Personal File.


PRINCIPAL
GDC-1 DIKhan
Principal
G.D.C. No. 1 D.I.KI

*Attested
Anwar Adw*



- 9 -

Address: B-2

(17)

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

Phone # 091-9210242, 9211025/Fax # 9211803

No. 4382 / CA-1/ Estt: Branch/A-2/Hafiz Inayatullah/ Islamiyat

Dated Peshawar the 15/2/2017

To

The Principal
Govt: Degree College, No. 1 D.I.Khan.

SUBJECT SELECTION OF DR. HAFIZ INAYATULLAH, ASSISTANT PROFESSOR OF ISLAMIYAT AT THE DEPARTMENT OF ISLAMIC STUDIES AND ARABIC, GOMAL UNIVERSITY, D.I.KHAN.

Memo:

I am directed to refer to your letter No. 3396 dated 31.12.2016 on the subject cited above and to state that the officer concerned tendered resignation from service in 2014 and you were required to process same at that time but after a lapse of three years, you have sent his resignation case. As the officer concerned is still on the strength of this Department, then why did you relieve him without prior approval of the Competent Authority?

I am, therefore, directed to ask you to explain your position in this regard within a week positively of the receipt of this letter.

Encls: No. 4383-84

By 14/2/17
DY: DIRECTOR (ESTABLISHMENT)

Copy of the above is forwarded to the:-

1. Registrar Gomal University, D.I.Khan with the remarks that Mr. Inayatullah, Assistant Professor of Islamiyat has neither been relieved properly by this Department nor tendered resignation from service in this Department then how he has taken over charge at the University without approval of the Competent Authority.
2. Section Officer (Colleges-II), Govt; of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.

*Attested
Anwar Adr*

By 14/2/17
DY: DIRECTOR (ESTABLISHMENT)

- H -

18

To: The Director,
Higher Education Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: CHARGE REPORT IN RESPECT OF DR. HAFIZ INAYATULLAH,
ASSISTANT PROFESSOR OF ISLAMIAT, GOVT. DEGREE COLLEGE
NO.1, D.I.KHAN.

Respected Sir,

With due regards it is submitted that I was serving in the Higher Education Department, Khyber Pakhtunkhwa, Peshawar, and was posted as Assistant Professor Islamiat in Govt. Degree College No.1 D.I.Khan. However, I after obtaining proper Departmental Permission vide Notification No.1970/A-12/CA-V/Estt: Branch/Dr. Hafiz Inayatullah/ Islamic Studies dated 19.09.2012, applied for the post of Assistant Professor in the Department of Islamic Studies & Arabic, Gomal University, D.I.Khan. After my selection in the Gomal University, I rendered my resignation on 07.04.2014 with the request to transfer my service record to the Gomal University. But in-fact neither my resignation was processed nor my service record was transmitted to the Gomal University; nevertheless, after my appointment in the Gomal University, I started to perform duties there.

Now, the Registrar Gomal University received letter bearing Endst. No.4383-84/CA-I/Estt: Branch/A-12/Hafiz Inayatullah/ Islamiat dated 15.02.2017 which reflects that my resignation was not processed in time and is pending; thus, I am still on the strength of Higher Education Department. The authority of Gomal University directed me to settle the matter with the Higher Education Department. I accordingly went back to the Principal, Govt. Degree College No.1 D.I.Khan and expressed my willingness to resume my duties as Assistant Professor Islamiat in the said College and wanted to submit arrival/charge report. The Principal GDC No.1 D.I.Khan advised me to approach the office of Director Higher Education. Accordingly, I on 27th

*Alleged
Answer ad*

20

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



Dated Peshawar the August 9th, 2017.

NOTIFICATION

No. 20 (C-II) (HEP) 13-2017. The competent authority is pleased to
accept the request of Dr. Hafiz Inayat Ullah, Assistant Professor of Islamiyat for
withdrawal of his resignation w.e.f. 08.02.2017.

Consequent upon the above, Directorate of Higher Education is
requested to submit his posting proposal to this department for further necessary
action.

SECRETARY
HIGHER EDUCATION DEPARTMENT

Ends: No. & Date Even.

Copy of the above is forwarded to the:-

1. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal, Govt. Degree College, No.1, Dikhan.
3. Deputy Director (I.T), HEMIS Cell, Peshawar.
4. District Account Officer, D.I. Khan.
5. Officer concerned.
6. PS to Secretary Higher Education, Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER (COLLEGE-II)
(M. ASLAM KHAN)
Self

Handwritten signature/initials



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

21

Dated: Peshawar September 18, 2017.

NOTIFICATION

NO. SO (C-II) HED/13-20/2010: The Competent Authority is pleased to order the posting/adjustment of **Dr. Hafiz Inayatullah**, Assistant Professor of Islamiyat (BS-18) at Govt. Degree College No.1, D.I.Khan against the vacant post.

Note: No T.A / D.A is allowed.

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN:

Copy of the above is forwarded to the:

1. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar w/r to his letter No.21411/CA-II/Estt: Branch/A-12/ dated 15.08.2017.
2. Principal Govt. Degree College No.1, D.I.Khan.
3. District Accounts Officer, D.I.Khan.
4. Officer concerned.

M. Aslam Khan
(M. ASLAM KHAN)
SECTION OFFICER (COLLEGES-II)

Attested
Amir-adr

22

To

The Principal,
Gov.t Degree College No. 1
D.I.Khan.

Subject: - ARRIVAL REPORT.
R/Sir,

In compliance with the Notification NO SO(C-II) HED/13-20/2010 dated Peshawar September 18, 2017. I, Dr. Hafiz Inayatullah Assistant Professor of Islamiyat, hereby submit my arrival report on 16-11-2017 (F.N) for duty at Govt. Degree College No. 1, D.I.Khan. I have been properly relieved from the Establishment Department Gomal University D.I.Khan vide No. 7074-81/GU/Estt:/ Dated 16-11-2017.

Your honor is requested to accept my arrival report.

Yours Obediently,



DR. HAFIZ INAYATULLAH
Assistant Professor Islamiyat,
Govt. Degree College No. 1
D.I.Khan

Dated: 16-11-2017

Arrival Accepted

Inayatullah
16/11/17

Attested

Inayatullah



GOMAL UNIVERSITY, DERA ISMAIL KHAN

ESTABLISHMENT SECTION

23

No. 7074-81/GU/Estt: /

Dated: 16/11/2017

To

Hafiz Inayat Ullah
Assistant Professor
Department of Islamic Studies & Arabic

Subject: - **Relieving from Gomal University**

Reference your application dated 03.10.2017 on the subject as cited.

The Competent Authority has been pleased to relieve you from the Department of Islamic Studies & Arabic, Gomal University, D.I.Khan today on 15.11.2017 (A.N) on your own request to report to your parent department.

F- 8/15/11/2017
Deputy Registrar (Estt:)-I

Endst: No. _____/GU/Estt:

Dated: 16/11/2017

Copy Forwarded to:-

1. The Registrar, Gomal University.
2. The Chairman, Department of Islamic Studies & Arabic.
3. The Secretary to Vice Chancellor, Gomal University.
4. The Director Finance, Gomal University.
5. Section Officer (Colleges-II), Government of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.
6. Pay Officer
7. Establishment Section

Sd/-
Deputy Registrar (Estt:)-I

Attested
Anwar-nd

- J -

(24)

31



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

No. SO (C-II)HED/13-20/2010/ Inayat Ullah/AP
Dated Peshawar the 16.08.2017.

3/7A

To

The Director,
Higher Education, Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: - INITIATION OF DISCIPLINARY PROCEEDINGS

I am directed to refer to your letter No. 1719/CA-I/Estt. Branch dated 23.06.2017 on the subject noted above and to state that a facts finding inquiry be conducted into the matter and a responsibility be fixed on the delinquents for not processing the resignation case of Mr. Inayat Ullah, Assistant Professor of Islamiyat, Govt. Degree College No.1, D.I.Khan for a lapse of three years and the requisite report thereof be submitted to this department on an early date please.

O/C

(M. ASLAM KHAN) 16/8/2017
SECTION OFFICER (COLLEGES-II)

Attested
Inayat Ullah

16/8/08



DIRECTORATE OF HIGHER EDUCATION

**KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR**

Phone # 091-9210242, 9211025/Fax # 9210215
/ CA-1/ Esct: Branch/A-12/H. Inayatullah/ Islamiyat

25

No. _____

Dated Peshawar the 22 / 2 / 2018

To

Mr. Irfanullah,
Professor
Govt; Degree College, Daggar (Buner).

SUBJECT

DISCIPLINARY PROCEEDINGS AGAINST HAFIZ
INAYATULLAH, ASSISTANT PROFESSOR OF ISLAMIYAT,
GOVT; DEGREE COLLEGE, NO. 1 D.I.KHAN.

Memo:

I am directed to refer to enclose herewith a copy of the Section Officer (Colleges-II), Govt; of Khyber Pakhtunkhwa, Higher Education Department, Peshawar letter No. SO (Colleges-II)/HED/13-20/2010/Inayatullah/AP/3179 dated 16.08.2017 on the subject cited above alongwith enclosures and to state that the Director, Higher Education, Khyber Pakhtunkhwa is pleased to appoint you as Inquiry Officer in the subject case.

It is requested to probe into the allegations and conduct a fact finding inquiry in the captioned case and report thereof be sent to this office alongwith recommendations within a week positively for onward submission to the Provincial Government.

BY: DIRECTOR (ESTABLISHMENT)

Endst; No. 4621

Copy of the above is forwarded to the Principal, Govt; Degree College, No. 1 D.I.Khan.

BY: DIRECTOR (ESTABLISHMENT)

Q.S. No. 1 D.I. Khan
DIARY No. <u>60</u>
DATED <u>22-02-018</u>

Attested
[Signature]
A-12

5. Buzhi
9/2/18
BY: DIRECTOR (ESTABLISHMENT)
File to put in the file of Dr. Inayatullah for record.
M. Yaqub
25-02-18

26



GOVT. COLLEGE NO.1 DERA ISMAIL KHAN



Police Lines Road Adjacent High Court Building D. I. Khan, Khyber Pakhtunkhwa Pakistan
Ph # 0966-9280134 Email: gcno1.dikhan@gmail.com

No.

1633
Dated: 23.05.2017

To

The Director,
Higher Education,
Khyber Pakhtunkhwa, Peshawar.

Respected Sir,

Reference your office letter No. 4382/CA-I/Estt:Branch/A-12/Hafiz Inayatullah/ Islamiat Dated 15/02/2017 and Reminder I No. 13582CA-I/Estt:Branch/A-12 Hafiz Inayatullah/ Islamiat Dated 17/05/2017.

The Ex-Principal Professor Syed Abid Hussain has categorically explained the cause of delay in submission of the case of Dr. Hafiz Inayatullah's resignation vide his letter No. 3396 dated 31/12/2016. (Copy attached)

In the opinion of the undersigned, the Ex-Principal had relieved the officer vide No. 932-38 dated 28/04/2014 on humanitarian ground after submission of his resignation, as the period of submitting arrival is 30 days and the departmental process takes months. Therefore, his case, as per the officer's written request dated 8th may, 2017, may be treated on sympathetic grounds. Copies of the documentary record are attached for kind perusal.

Attested
Shirwan Toke

Principal
G.C No. 1, D.I. Khan,
Govt. College No. 1, D.I. Khan.



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

27

No. SO (C-II) /HED/ 13-20/ 2010/Inayatullah/Islamiyat
Dated Peshawar the 15.05.2018

To

The Secretary to Govt. of Khyber Pakhtunkhwa
Establishment Department.

SUBJECT: - INITIATION OF DISCIPLINARY PROCEEDINGS.

Dear Sir,

I am directed to refer to the subject cited above and to state that Hafiz Inayatullah, Assistant Professor of Islamiyat (BS-18) Govt. Degree College No.1, D.I.Khan got appointed as Assistant Professor (BS-19) at Gomal University D.I.Khan through proper channel on 23.04.2014. The officer concerned submitted his resignation application to the Principal Govt. Degree College D.I.Khan and the Principal concerned relieved him at his own level to take up his new assignment. In addition, the Principal concerned did not furnish the resignation case to this Department and in the meanwhile the above named Assistant Professor after a period of three years submitted arrival report for duty on 08.05.2017 (**Annex-I**). This Department posted/adjusted the officer concerned at his previous college directing the Directorate of Higher Education to conduct an inquiry against the officials for not processing the resignation case within due course of time. Subsequently, Inquiry Officer, Professor Irfanullah, Govt. Degree College Daggar Buner has submitted inquiry report, inter alia, the I.O proposed that the stint w.e.f 23.04.2014 to 08.05.2017 may be regarded as deputation period (Inquiry report is enclosed for ready reference).

In view of foregoing, the Establishment Department is requested to extend its expert opinion as to how the instant case is to be dealt with.

Encl: As above.

Yours faithfully,

(Muhammad Fayaz Khan)
SECTION OFFICER (COLLEGES-II)

Endst:- No. & Date even.

Copy for information is forwarded to Director Higher Education, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 10957/CA-II/Estt. Branch/ A-12/ dated 04/04/2018.

SECTION OFFICER (COLLEGES-II)

Attested
Inayatullah

- K -

28

To

**THE SECRETARY,
HIGHER EDUCATION,
KHYBER PAKHTUNKHWA,
PESHAWAR.**

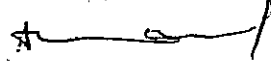
Subject: CONDONATION OF DEFICIENCY IN SERVICE PERIOD.

Sir,

Reference Secretary Finance Department Office Letter No: FD(SOSR-II)F-36/2018 Dated: 09/04/2018 addressed to the Hon, Secretary Higher Education for the subject cited above.

In the Light of the Captioned above letter, your honour is requested to process my case to the Finance Department for Condonation of Deficiency in Service Period w.e.f 07/04/2014 to 15/11/2017.

Your Obediently



**Dr. HAFIZ INAYAT ULLAH,
G.C. NO 1 D.I.KHAN.**

Dated: 21-02-2019

*Attested
Inayat Ullah*



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO.FD(SOSR-II)4-36/2018
Dated Peshawar the 09/04/2018

To,

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

Subject: **CONDONATION OF DEFICIENCY IN SERVICE PERIOD.**

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith an application in respect of Dr. Hafiz Inayatullah Assistant Professor alongwith connected documents for your valuable comments/view for further necessary action in the matter please.

Yours faithfully,

(NAEEM TABASSUM)
SECTION OFFICER (SR.II)

Endst: No. & date even:

Copy of the above is forwarded to

Dr. Hafiz Inayatullah, Assistant Professor, Govt. Degree College No.1,
D.I.Khan.

Naees
SECTION OFFICER (SR.II)

09/09/18

*Attested
Inayatullah*

To: **The Honourable Secretary,
Finance Department,
Khyber Pakhtunkhwa, Peshawar.**

Subject: **APPLICATION FOR THE CONDONATION OF
INTERRUPTION IN SERVICE.**

Most Respected Sir,

I do very respectfully submit that I was serving in the Higher Education Department, Khyber Pakhtunkhwa, Peshawar, and was posted as Assistant Professor Islamiyat in the Govt. Degree College No.1 D.I.Khan. However, I after obtaining proper Departmental Permission vide Notification No.1970/A-12/CA-V/Estt: Branch/Dr. Hafiz Inayatullah/ Islamic Studies dated 19.09.2012 (copy attached), and applied for the post of Assistant Professor in the Department of Islamic Studies & Arabic, Gomal University, D.I.Khan. After my selection in the Gomal University, I rendered my resignation on 07.04.2014 with the request to transfer my service record to the Gomal University. But in-fact neither my resignation was processed nor my service record was transmitted to the Gomal University; nevertheless, after my appointment in the Gomal University, I started to perform duties there.

In the meanwhile, Higher Education Department vide letter No.4382/CA-1/Estt: Branch/A-12/Hafiz Inayatullah /Islamiyat dated 15.02.2017 (copy attached) pointed out that my resignation was not processed by the Principal, Govt. Degree College No.1 D.I.Khan and thus the applicant was still on the strength of Higher Education Department. In response to the said letter, applicant-applied for his repatriation from Gomal University to the Higher Education Department Khyber Pakhtunkhwa which was allowed vide Notification No.SO(C-II)/HED/13-22/2010 dated 09.08.2017 (copy attached) and then vide Notification dated September 18, 2017 (copy attached) the Honourable Secretary Higher Education Department posted/adjusted the applicant at the Govt. Degree College No.1 D.I.Khan.

Attested
Signature

After getting relieved from the Gomal University, the applicant reported back to the Principal Govt. Degree College No.1 D.I.Khan on 16.11.2017 vide his even dated Arrival report and Certificate of Transfer of Charge (copy attached).

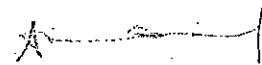
Respected Sir,

As the applicant had already rendered the government service in the Higher Education Department w.e.f. 05.12.1998 to 07.04.2014 i.e. almost 16 years in the Higher Education Department; then served in the Gomal University w.e.f. 07.04.2014 to 15.11.2017; and now again applicant has started to perform official duties in the Higher Education Department (Govt. Degree College No.1 D.I.Khan). However, 03Years—07Months—11Days service rendered in the Gomal University, is causing interruption in the service of applicant resulting a great inconvenience to him.

Therefore, the applicant most respectfully beseeches your kind honour to please munificently condone the above referred interruption in the service of applicant; and the applicant shall be very thankful to you for this generous act of kindness.

Yours most Obedient Servant,

April 04, 2018.



Dr. Hafiz Inayatullah
Assistant Professor,
Govt. Degree College No.1, D.I.Khan.

Attested
Amir-adr

**IMMEDIATE
CONFIDENTIAL**



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

NO. SO(PSB)ED/1-4/2019/P-221
Dated Peshawar, the 07.05.2019

To

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

**SUBJECT: - MINUTES OF THE MEETING OF PROVINCIAL SELECTION BOARD
HELD ON 19.04.2019**

**PROMOTION OF MALE ASSISTANT PROFESSOR BS-18 TO THE
POST OF ASSOCIATE PROFESSOR IN THE COLLEGE CADRE.**

Dear Sir,

I am directed to refer to Higher Education Department letter No. SO(C-II)/2-5/2018/BS-18 to BS-19 dated 27.03.2019 on the subject and to forward herewith an extract of item No. (59) of the minutes/recommendations of the meeting of Provincial Selection Board held on 19.04.2019 as well as copy of approved summary wherein the Chief Minister being competent authority in terms of Rule 4 (1) (a) of the Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 has approved the recommendation of the PSB for further necessary action.

Yours faithfully,

(Signature)
(Abdul Hameed)
SECTION OFFICER (PSB)

Encl: As Above

Put up 3/5

So(C-II)

08/05/19

*Attested
Anwar Adn*

(Signature)
DY: DIRECTOR (ESTABLISHMENT)

MEM NO (59)

HIGHER EDUCATION ARCHIVES LIBRARIES DEPARTMENT

(Meeting of PSB held on 19.04.2019)

SUBJECT: - PROMOTION OF MALE ASSISTANT PROFESSOR BS-18 TO THE POST OF ASSOCIATE PROFESSOR BS-19

Secretary Higher Education, Archives and Libraries apprised the Board that due to promotion and retirement, 125 posts of Associate Professor BS-19 are lying vacant.

- 2. According to service rules the post is required to be filled as under:-
 - ii. "20% by initial recruitment and
 - iii. 80% by promotion on seniority cum fitness basis from amongst the persons holding the post of Assistant Professors with atleast twelve (12) years service in BS-17 and above; provided that in case of person initially appointed in BS-18 the minimum length of service for promotion in their cases shall be seven (07) years".

3. The service record of the officers included in the panel was discussed as follows: -

S#	NAME OF OFFICER	RECOMMENDATIONS OF THE BOARD
1.	Mr. Muhammad Suleman <i>Attested</i> <i>Section Officer (PSB)</i> <i>Govt of Khyber Pakhtunkhwa</i> <i>Establishment Department</i>	His date of birth is 20.04.1963. He joined government service on 01.04.1989 in BS-17. He was promoted to BS-18 on 14.03.2007. The Board in its meeting held on 25.02.2014, 30.06.2014, 26.06.2016 and 08.11.2017 recommended to defer his promotion as his PER for the period from 01.08.1992 to 31.12.1992, 01.01.1993 to 30.06.1993, 2006 to 2009, 2011, 2012 to 2016 were not available. He has subsequently completed his missing IPERS. The Board in its meeting held on 03.05.2018, 17.09.2018 and 26.12.2018 recommended to defer his promotion as he had not undergone training mandatory for promotion. Position is still the same and his PER for the year 2018 is also not available. The Board recommended to defer his promotion.
2.	Mr. Shah Baz Faisal	His date of birth is 24.03.1970. He joined government service on 22.09.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. The Board in its meeting held on 03.05.2018, 17.09.2018 and 26.12.2018 recommended to defer his promotion as he had not undergone training mandatory for promotion. Position is still the same. The Board recommended to defer his promotion.
3.	Mr. Jehan Alam	His date of birth is 12.05.1964. He joined government service on 11.09.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.

Attested
Amir

g/c DY: DIRECTOR (ESTABLISHMENT)
19/8/2/19

		The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.
28.	Mr. Rashid Iqbal	His date of birth is 12.09.1968. He joined government service on 08.12.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. The Secretary informed the Board that he is undergoing training mandatory for promotion which will be completed on 23.04.2019. No enquiry is pending against him. His service record upto 2018 is generally good. The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis subject to successful completion of mandatory training. He will be on probation for a period of one year.
29.	Mr. Muhammad Shakeel	His date of birth is 11.04.1973. He joined government service on 07.12.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good. The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.
30.	Hafiz Ilayatullah	His date of birth is 15.08.1965. He joined government service on 07.12.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. He has undergone training mandatory for promotion. His PER for the year 2012 is not available and a departmental enquiry is also pending against him. The Board recommended to defer his promotion.
31.	Mr. Muhammad Hassan	His date of birth is 15.03.1973. He joined government service on 14.12.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good. The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.
32.	Mr. Badiuz Zaman Shah	His date of birth is 11.11.1968. He joined government service on 14.12.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.

CONFIDENTIAL

Section Officer (PSB)
Govt. of Khyber Pakhtunkhwa
Establishment Department

Attested
Shahwar Azhar

8/2/19
DY: DIRECTOR (ESTABLISHMENT)

		<p>undergoing training mandatory for promotion which will be completed on 23.04.2019. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis subject to successful completion of mandatory training. He will be on probation for a period of one year.</p>
84.	Mr. Muhammad Asad	<p>His date of birth is 03.12.1978. He joined government service on 09.01.2012 in BS-18. The Secretary informed the Board that he is undergoing training mandatory for promotion which will be completed on 23.04.2019. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis subject to successful completion of mandatory training. He will be on probation for a period of one year.</p>
85.	Mr. Aftab Ahmad	<p>His date of birth is 09.11.1972. He joined government service on 03.02.2003 in BS-17 and was appointed to BS-18 on 06.04.2012. The Secretary informed the Board that he is undergoing training mandatory for promotion which will be completed on 23.04.2019. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis subject to successful completion of mandatory training. He will be on probation for a period of one year.</p>

Attested
 Section Officer (PSB)
 Govt. of Khyber Pakhtunkhwa
 Establishment Department

Attested
 Munawar John

To

The Chief Secretary,
Khyber Pakhtunkhwa
Peshawar.

Subject: APPEAL FOR REVIEWING / PLACING AGAIN MY CASE FOR
P.S.B.

Honourable Sir,

I am working as an Assistant Professor of Islamiyat at G.D.C No 1 D.I.Khan. Recently I have attended mandatory training at HEART Peshawar w.e.f 18-02-2019 to 19-03-2019. Copy of certificate attached as **Annexure "A"**.

I have submitted all of P.E.Rs of the college as well as of University service including of 2018 from G.D.C NO 1 D.I.Khan.

Sir, It has come to my notice that my name has been deferred from the P.S.B conducted on 19-04-2019, due to inquiry proceeding against me.

Sir, I humbly state that the Inquiry is not against me but it is actually against the delinquent officials who have processed my resignation case late.

I have tendered my resignation through proper channel according to the directions of Directorate of Higher Education vide No. 10898 dated 15-05-2014. Copy attached as **Annexure "B"**.

I obtained my N.O.C from the Department as well which is attached as **Annexure "C"**.

I was selected / appointed as Assistant Professor (BPS-19) in Gomal Univeristy D.I.Khan through selection board, and I was relieved by the principal Govt Degree College No 1 D.I.Khan Copy attached as **Annexure "D"**.

After lapse of more than three years, the Directorate of Higher Education KP, Peshawar sent a letter to Principal Govt Degree College No 1 D.I.Khan Dated: 15-02-2017 Copy Attached as **Annexure "E"** which was self-explanatory, vide a copy endorsed to the Registrar Gomal University D.I.khan and stated that the Assistant Professor Mr. Hafiz Inayat Ullah has not been relieved properly by the Education

Attested
Signature

Department. In response to above letter dated: 15-02-2017, I have sent an application to the Director Higher Education Department KP dated: 08-05-2017 copy attached as **Annexure "F"**, and I requested that my resignation may please be withdrawn and period served in Gomal University may please be treated on deputation.

Notification dated: 09/08-2017 (copy attached as **Annexure "G"**) issued by the secretary to Govt of KP Higher Education Department Peshawar withdrew my resignation with effect from 08-05-2017, as requested to the Directorate of Higher Education Department to Submit his posting proposal, which has been approved by the competent authority and notified dated: 18-09-2017 (copy attached as **Annexure "H"**) against the vacant post w.e. from 18-09-2017.

In compliance to the order of the competent authority, dated 18-09-2017, I submitted my arrival report as Assistant professor (BPS-18) at Govt Degree College No 1 D.I.Khan. copy attached as **Annexure "I"** I have been properly relieved by Gomal University D.I.Khan, vide office order No 7074-81/GU/Estt/ Dated: 16/11/2017 (Copy attached as **Annexure "J"**).

The Directorate and the Principal remained in Contact on the matter of my resignation which is crystal clear from the letter No 3396 dated: 31-12-2016 from the office of the Principal Govt Degree College No 1 D.I.khan copy of letter attached as **Annexure "K"**.

I remained satisfied that the matter has been officially processed; if this matter has not been completed, then it is not my fault sir.

The Official Correspondence from Secretariat has not nominated me at all. As the subject of the letter No: SO (C-II) HED /13-20/2010/ Inayatullah/AP/3179 dated: 16-08-2017 is about the "Initiation of Disciplinary Proceedings", i.e, the delinquent officials who failed to process my case copy attached as **Annexure "L"**.

The Self-Explanatory letter of the Principal Govt Degree College No 1 D.I.Khan vide No. 3396 dated: 31-12-2016 in which he blamed the deceased Senior clerk Mr. Ishfaq who has not properly processed my case is a Proof. Copy already attached.

Attested


Sir, Directorate of Higher Education is prejudiced against me as they have changed the subject of the Secretariat letter and shifted the flow of proceedings against me instead the delinquent officials. It amounts to malafide intentions of Directorate against me and led the secretariat astray.


The subject of the letter bearing No 4621 dated: 12-02-2018 is "DISCIPLINARY PROCEEDINGS AGAINST HAFIZ INAYATULLAH ASSISTANT PROFESSOR OF ISLAMIYAT, GOVT: DEGREE COLLEGE NO 1 D.I.KHAN" instead of actual secretariat letter titled "Initiation of Disciplinary Proceedings". Copies attached as **Annexure "M & N"**, which is a distortion of the fact stated by the secretariat.

Even then, the inquiry officer Mr. Professor Muhammad Irfan, G.D.C Daggar Bunner, does not blame me and recommends the stint w.e.f 23-04-2014 to 08-05-2017 for a deputation period as is clear vide letter No. SO (C-II) HED/13-20/2010/ Inayatullah / Islamiyat dated: 15-05-2018. Copy attached as **Annexure "O"**.

It is earnestly requested to your honor to include my name in the upcoming P.S.B which, I came to know, will be held in the next week for the redressal of the loss which I had in the shape of deferring of my case for promotion.

Dated: 25/04/2019.

Yours Obediently


DR HAFIZ INAYAT ULLAH
 Assistant Professor of Islamiyat
 Govt: Degree Collège No. 1
 Dera Ismail Khan.

Copy to:

1. PS to Additional Chief Secretary P&D Department, K.P Peshawar.
2. PS to Secretary Higher Education Department, K.P Peshawar.
3. *Secretary to Govt of Khyber Pakhtunkhwa
Establishment Department*

*Atestel
Shawarid*

VAKALATNAMA

- 39 -

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL

CAMP COURT D.I.KHAN

Hafiz Inayatullah **VERSUS** Govt of KP & others

TITLE Service Appeal

I/WE Hafiz Inayatullah

The Above Named Appellant hereby appoint

MUHAMMAD ANWAR AWAN ADVOCATE SUPREME COURT,

in the above Captioned Cases to all or any of the following Acts Deeds & Things.

- ✓ To Appear, Act & Plead for Me/Us in the above mentioned cases in this Court/Tribunal in which the same may be tried or heard or any other proceedings out of our connected therewith.
- ✓ To Sign, Verify, File OR Withdraw all proceedings, Petitions, Appeals, Affidavits, Applications for Compromise OR Withdrawals OR for the Submission of Arbitration of the said case OR any other Documents may be Deemed Necessary OR Advisable by them by the Conduct, Prosecution OR Defense of the above case at all its stages.
- ✓ To Receive Payments, Issue receipts for all moneys that may be OR become Due & Payable to us during the course on Conclusion of the Proceedings.
- ✓ To do all other Acts & Things, Which may be Deemed Necessary OR Advisable during the course of Proceedings.

AND HEREBY AGREE:

- To Ratify Whatever Advocates may do the Proceedings.
- Not to Hold the Advantages Responsibilities if the said case be proceed Ex-parte OR Dismissed in Default in Consequence of their Absence from the Court when it is called for Hearing.
- That the Advocates shall be entitled to withdraw from the Prosecution of the said case if the Whole or any part of the Agreed Fee Remain Un-Paid.
- That Advocates may be Permitted to argue any other point at the time of Arguments.

In Witness Whereof I/We have signed this Vakalatnama here under the Contents of which have been Read/Explained to Me/Us which is fully understood by Me/Us.

Dated: _____

Accepted By:

Muhammad Anwar Awan

[Signature]

SIGNATURE OF EXECUTANT (S)

0333 8812743

**MUHAMMAD ANWAR AWAN
ADVOCATE SUPREME COURT
03339962231**



DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA

Rano Garhi, Peshawar

Tel # 091-2660026 / 8330496

mail: dhekpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawar

6036

CA-1/Exec Branch / A-12/Hafiz Inayatullah/ Telera

Dated Peshawar the 21, 10, 2022

308

To

The Secretary
Govt; of Khyber Pakhtunkhwa
Higher Education Department, Peshawar.

SUBJECT EP NO. 388/2021 IN SA NO. 1052 HAFIZ INAYAT ULLAH
VERSUS GOVT. OF KHYBER PAKHTUNKHWA.

Respected Sir, السلام عليكم

I am directed to refer to your office letter No. SO (Colleges-II) /HED/2-6/2022/ Hafiz Inayatullah dated 14.10.2022 on the subject cited above and to state that the promotion case from B-18 to B-19 in respect of Hafiz Inayatullah has been sent to the Provincial Government for placement of his case in the upcoming PSB meeting vide this office letter No. 3687 dated 19.08.2022 and subsequent letter No. 2994 dated 30.06.2022. Copies enclosed of the same are enclosed for ready reference, please.

Yours Faithfully,

(Gohar Khan)

7c
DY: DIRECTOR (ESTABLISHMENT)

Endst; No. 6037-38

Copy of the above is forwarded to the:-

1. Section Officer (Litigation), Govt; of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.
2. Assistant Director (Litigation), Local Directorate.

21/10/2022
DY: DIRECTOR (ESTABLISHMENT)

24/7
①
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, CAMP COURT,
D.I.KHAN**

SA#1052/2019

Hafiz Inayat ullah..... Appellant

Versus

Govt. of Khyber Pakhtunkhwa,

Through Secretary, Higher Education Department

And others..... Respondents

**SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1, 2, 3, 6
AND 7**

Respectfully Sheweth: -

Preliminary Objections: -

1. That the Appellant has got neither cause of action nor locus standi to file the instant service appeal.
2. That the Appellant has not come to the Honourable Tribunal with clean hands and is trying to conceal material facts.
3. That the instant service appeal is hit by doctrine of laches.
4. That the Appellant is estopped by his own conduct to file the instant service appeal.
5. That the service appeal in hands is devoid of merits, hence liable to be dismissed.

Facts: -

1. Correct.
2. Correct to the extent that no objection certificate was issued to the appellant on the condition that in case of his selection against the post applied for, he will have to resign (**Annex-A**).
3. Incorrect, misleading pursuant to the NOC granted by the responding department, the appellant was required to submit his resignation in light of the NOC and then he has to wait for the formal approval by the competent authority with regard to his resignation acceptance. Actually the appellant didn't wait and also didn't submit formally his resignation to the competent authority instead malafidely he just only submit his resignation to the principal of the concerned college whereas he was Assistant Professor (BPS-18) and the principal concerned was not competent either to accept/reject his resignation or to relieve him on the basis of submission of resignation. The entire episode transpires malafide done by the appellant with the connivance of the then principal Govt: Degree College No. 1, D.I.Khan. Both submissions of resignation/relieving thereof are not covered under any law/rules. In a very hasty manner the appellant got his relieving from the Principal, Govt:

Degree College No. 1, D.I.Khan instead of waiting for the formal approval by the competent authority. The plea of the appellant is not based on facts. It is an attempt on his part to mislead the learned court for obtaining the desired relief.

- 4. Correct to the extent that respondent No. 2 called an explanation from the Principal concerned for not processing the case of the appellant in time through letter dated 15/02/2017 (Annex-B)
- 5. Correct.
- 6. Correct to the extent that an inquiry was conducted into the matter by Prof. Irfan Ullah Govt. Degree College, Daggar, Buner, wherein, it was proved that the issue of relieving has not been processed as per law as the officer was required to get himself relieved after proper notification of the acceptance of his resignation from the competent authority which he didn't do and left the department.
- 7. Pertains to record.
- 8. Correct to the extent that on the basis of working paper prepared by Directorate of Higher Education and on the information therein the case of promotion of the appellant was placed before PSB and on the basis of that very information the PSB accordingly recommended the deferment of the promotion case of the appellant, which was quite in accordance with spirit of rules.
- 9. Correct to the extent that appellant submitted an appeal to the Chief Secretary, Khyber Pakhtunkhwa and that was accordingly processed. The appellant's name was placed before the next meeting of PSB that was held on 23.09.2019 wherein the PSB while considering his case recommended that **"the Board in its meeting held on 19.04.2019 recommended to defer his promotion as his PER for the year 2012 was not available and a departmental enquiry was also pending against him. The Board was informed that he was appointed in the Gomal University, DI Khan and he left the resignation in the Department and joined Gomal University without waiting for acceptance of the resignation. After a period of 03 years, he submitted arrival report in the Department and the Department posted/ adjusted him and directed the Directorate of Higher Education to conduct an enquiry. The Board thoroughly discussed the issue and directed to serve him with a show cause notice."** (Annex-C)
- 10. Needs no comments.

Grounds: -

- 1. Incorrect. That the appellant has been treated within four corners of Law.
- 2. Incorrect. The plea of the appellant is misleading as para-3 explicitly/manifestly clarify that the appellant didn't submit his resignation to the competent authority and also didn't wait for the formal approval granted by the competent authority with regard to his resignation acceptance or otherwise. The plea of the appellant is void of facts.

3. Incorrect misleading the promotion was differed and deferment of promotion case is not a penalty because in case of deferment on any grounds, the inter se seniority remains the same and deferment is normally done on account of deficiency in the required criteria. It is worth to mention here is that his deferment of promotion is also for ^{WSP} one of PERs for certain periods.
4. Incorrect as already explained in the preceding paras ^{of} of facts.

Prayers: -

It is, therefore, humbly prayed that the instant Service appeal is devoid of merits, hence may graciously be dismissed with appropriate costs.




Chief Secretary,
Govt: of Khyber Pakhtunkhwa
Respondent No. 06



Secretary,
Higher Education, Archives &
Library Department
Respondent No. 01



Director,
Directorate of Higher Education
Respondent No. 02



Deputy Director,
Directorate of Higher Education
Respondent No. 03

Chairman,
Provincial Selection Board,
Respondent No. 07



Annex "A"

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**
Phone # 091-9211025, 091-9210242, Fax # 091-9210242

No. _____ /A-12/CA-V/Estt;Branch/Dr.Hafiz Inayatullah/Islamic Studies Dated Peshavar, the 27/09/2012.

To

The Registrar,
Gomal University,
D.I.Khan.

Subject: - DEPARTMENTAL PERMISSION.

Memo.

I am directed to refer to the subject noted above and to state that this Directorate has no objection upon applying to the post of Assistant Professor of Islamiyat (B-19) at Gomal University, DIKhan in respect of Dr.Hafiz Inayatullah Assistant Professor of Islamiyat Govt.Degree College No.1 DIKhan.

DY; DIRECTOR (ESTABLISHMENT)

Endst.No. 19701

Copy of the above is forwarded to the Principal Govt.Degree College No.1 DIKhan w/r to his letter No.831 dated 31.08.2012 with the remarks that in case of his selection against the post applied for, he will have to resign from the present post and his lien will not be retained in this Department.

DY; DIRECTOR (ESTABLISHMENT)

*By Clerk
Inform the officer
concerned about the
outcome.*
[Signature]
28-09-12

*Noted Please
1-10-2012*

G.O. No. 1 D.I. Khan
DIARY No. 405
DATED 29/09/12

Annex - B



DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR



No. 6382 / CA-1/ Estt: Branch/A-12/Hafiz Inayatullah/ Islamiyat
Phone # 091-9210242, 9211025/Fax # 9211303

Dated Peshawar the 15/2/17

To

The Principal
Govt: Degree College, No. 1 D.I.Khan.

SUBJECT

SELECTION OF DR. HAFIZ INAYATULLAH, ASSISTANT
PROFESSOR OF ISLAMIYAT AT THE DEPARTMENT OF
ISLAMIC STUDIES AND ARABIC, GOMAL UNIVERSITY,
D.I.KHAN.

Memo:

I am directed to refer to your letter No. 3396 dated 31.12.2016 on the subject cited above and to state that the officer concerned tendered resignation from service in 2014 and you were required to process same at that time but after a lapse of three years, you have sent his resignation case. As the officer concerned is still on the strength of this Department, then why did you relieve him without prior approval of the Competent Authority?

I am, therefore, directed to ask you to explain your position in this regard within a week positively of the receipt of this letter.

Enclst: No.

6383-84

BY: DIRECTOR (ESTABLISHMENT)

14/2/17

Copy of the above is forwarded to the:-

1. Registrar Gomal University, D.I.Khan with the remarks that Mr. Inayatullah, Assistant Professor of Islamiyat has neither been relieved properly by this Department nor tendered resignation from service in this Department then how he has taken over charge at the University without approval of the Competent Authority.
2. Section Officer (Colleges II), Govt: of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.

14/2/17

BY: DIRECTOR (ESTABLISHMENT)

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P
**IMMEDIATE
CONFIDENTIAL**



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

NO. SO(PSB)ED/1-4/2019/P-229
Dated Peshawar, the 02.10.2019

To

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

**SUBJECT: - MINUTES OF THE MEETING OF PROVINCIAL SELECTION BOARD
HELD ON 23.09.2019.**

**PROMOTION OF ASSISTANT PROFESSOR BS-18 MALE TO THE
POST OF ASSOCIATE PROFESSORS BS-19 OF COLLEGE CADRE.**

Dear Sir,

I am directed to refer to Higher Education Department letter No. SO(C-II)HED/2019/BS-18 to BS-19 dated 16.09.2019 on the subject and to forward herewith an extract of Item No (67) of the minutes/recommendations of the meeting of Provincial Selection Board held on 23.09.2019 as well as copy of approved summary wherein the Chief Minister being competent authority in terms of Rule 4 (1) (a) of the Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 has approved the recommendation of the PSB, for further necessary action.

Yours faithfully,

Abdul Hameed
(Abdul Hameed)

SECTION OFFICER (PSB)

Encl: As Above

SECRET

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ITEM NO (67)

HIGHER EDUCATION ARCHIVES AND LIBRARIES DEPARTMENT

(Meeting of PSB held on 23.09.2019)

SUBJECT: - PROMOTION OF MALE ASSISTANT PROFESSOR BS-18 TO THE POST OF ASSOCIATE PROFESSOR BS-19.

Secretary Higher Education, Archives and Libraries apprised the Board that due to promotion and retirement, 86 posts of Associate Professor BS-19 are lying vacant.

2. According to service rules the post is required to be filled as under:-

- i. "20% by initial recruitment and
- ii. 80% by promotion on seniority cum fitness basis from amongst the persons holding the post of Assistant Professors with atleast twelve (12) years service in BS-17 and above; provided that in case of person initially appointed in BS-18, the minimum length of service for promotion in their cases shall be seven (07) years".

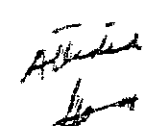
3. The service record of the officers included in the penal was discussed as follows: -

S#	NAME OF OFFICER	RECOMMENDATIONS OF THE BOARD
1.	Syed Muzaffar Ali Shah	His date of birth is 18.05.1962. He joined government service on 23.01.1988 in BS-17. He was promoted to BS-19 on 14.03.2007. According to the Department, the competent authority has imposed a major penalty of reduction to the lower post for five years. The Board did not consider his promotion.
2.	Mr. Muhammad Suleman	His date of birth is 20.04.1963. He joined government service on 01.04.1989 in BS-17. He was promoted to BS-18 on 14.03.2007. The Board in its meeting held on 25.02.2014, 30.06.2014, 26.06.2016 and 08.11.2017 recommended to defer his promotion as his PER for the period from 01.08.1992 to 31.12.1992, 01.01.1993 to 30.06.1993, 2006 to 2009, 2011, 2012 to 2016 were not available. He has subsequently completed his missing PERs. The Board in its meeting held on 03.05.2018, 17.09.2018, 26.12.2018 and 19.04.2019 recommended to defer his promotion as he had not undergone training mandatory for promotion and his PER for the year 2018 was also not available. The Board was informed that he was nominated for training four times but he did not avail it. The Board recommended his supersession.
3.	Mr. Shah Baz Faisal	His date of birth is 24.03.1970. He joined government service on 22.09.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. The Board in its meeting held on 03.05.2018, 17.09.2018, 26.12.2018 and 19.04.2019 recommended to defer his promotion as he had not undergone training mandatory for promotion. Position is still the same.

		The Board recommended to defer his promotion.
4.	Hafiz Inayatullah ✓	<p>His date of birth is 15.08.1965. He joined government service on 07.12.1998 in BS-17. He was promoted to BS-18 on 18.05.2011. He has undergone training mandatory for promotion. The Board in its meeting held on 19.04.2019 recommended to defer his promotion as his PER for the year 2012 was not available and a departmental enquiry was also pending against him. The Board was informed that he was appointed in the Gomal University, D.I.Khan and he left the resignation in the Department and joined Gomal University without waiting for acceptance of the resignation. After a period of 03 years, he submitted arrival report in the Department and the Department posted/adjusted him and directed the Directorate of Higher Education to conduct an enquiry. The Board thoroughly discussed the issue and directed to serve him with a show cause notice.</p> <p>The Board recommended his supersession.</p>
5.	Mr. Jamil Ahmad ✓	<p>His date of birth is 01.06.1973. He joined government service on 01.09.1999 in BS-17 and was promoted to BS-18 on 18.05.2011. The Board in its meeting held on 19.04.2019 recommended to defer his promotion as he had not undergone training mandatory for promotion. Moreover, his PERs for the year 2011, 2012 & 2015 to 2018 were also not available. He has now completed his PERs dossier and has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor <u>BS-19</u> on regular basis. He will be on probation for a period of one year.</p>
6.	Mr. Ihtesham Gul ✓	<p>His date of birth is 28.01.1981. He joined government service on 18.05.2008 in BS-17 and was appointed to BS-18 on 25.01.2012. The Board in its meeting held on 19.04.2019 recommended to defer his promotion as he was on study leave upto 04.09.2018 and had not earn one calendar year PER after expiry of leave. Now he has earned special report w.e.f. 05.09.2018 to 04.09.2019. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 04.09.2019 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on</p>

		probation for a period of one year.
7.	Mr. Javed Khan ✓	<p>His date of birth is 15.04.1978. He joined government service on 01.10.2003 in BS-17 and was appointed in BS-18 on 06.04.2012. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
8.	Mr. Abdul Qayyum Khan	<p>His date of birth is 12.02.1969. He joined government service on 10.03.2003 in BS-17 and was appointed in BS-18 on 06.04.2012. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
9.	Mr. Fazal Wahid ✓	<p>His date of birth is 14.04.1981. He joined government service on 27.01.2012 in BS-17 and was appointed in BS-18 on 08.03.2013. He has undergone training mandatory for promotion. He has not yet completed prescribed length of service for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for appointment to the post of Associate Professor BS-19 on acting charge basis.</p>
10.	Mr. Muhammad Tahir <i>Muhammad Tahir</i> Secretary (PSB) Government of Punjab Lahore	<p>His date of birth is 31.05.1963. He joined government service on 01.09.1999 in BS-17 and was promoted to BS-18 on 27.07.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
11.	Mr. Aftar Khan ✓	<p>His date of birth is 20.01.1970. He joined government service on 14.09.1999 in BS-17 and was promoted to BS-18 on</p>

		<p>27.07.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
12.	Mr. Fahim Ilyas	<p>His date of birth is 01.05.1973. He joined government service on 21.12.1999 in BS-17 and was promoted to BS-18 on 27.07.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
13.	Mr. Zahir Shah	<p>His date of birth is 15.04.1975. He joined government service on 09.09.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
14.	Mr. Muhammad Saeed Amjad	<p>His date of birth is 07.07.1962. He joined government service on 01.09.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
15.	Mr. Saeed Akhtar	<p>His date of birth is 18.04.1972. He joined government service on 01.09.1999 in BS-17 and was promoted to BS-18 on 07.11.2016. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p>


 SECRETARY (GSE)
 Board of Studies, Government
 Education Department

		<p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
16.	Mr. Mushtaq Ahmad	<p>His date of birth is 26.04.1970. He joined government service on 20.11.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His PER for the year 2018 is adverse. His remaining service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
17.	Mr. Bakht Nawab	<p>His date of birth is 16.02.1970. He joined government service on 01.09.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
18.	Mr. Kalimullah	<p>His date of birth is 07.10.1974. He joined government service on 16.01.2002 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
19.	Mr. Noor Kamal Shahi	<p>His date of birth is 10.12.1969. He joined government service on 12.11.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post</p>

		of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.
20.	Mr. Nadeem Ahmad Qureshi	<p>His date of birth is 16.03.1970. He joined government service on 16.12.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
21.	Mr. Shahzeb	<p>His date of birth is 05.04.1967. He joined government service on 01.12.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
22.	Mr. Wajib Ullah	<p>His date of birth is 10.05.1973. He joined government service on 01.01.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
23.	Mr. Farman Ali	<p>His date of birth is 07.04.1972. He joined government service on 16.11.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
24.	Mr. Shah Hussain	His date of birth is 12.02.1969. He joined government service

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 Mr. Wajib Ullah (PSB)
 Director of Higher Education
 Government of Punjab
 Lahore

(13)

(152)

PSB meeting held on 23.09.2019.

		<p>on 01.09.1999 in BS-17 and was promoted to BS-18 on 22.04.2014. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
25.	Mr. Ajmal Khan	<p>His date of birth is 12.12.1967. He joined government service on 19.11.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
26.	Mr. Pir Sardar Shah	<p>His date of birth is 30.03.1967. He joined government service on 01.11.2002 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
27.	Mr. Abdul Qahir Nasir	<p>His date of birth is 10.04.1962. He joined government service on 15.11.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
28.	Mr. Mir Zaman	<p>His date of birth is 13.01.1972. He joined government service on 22.01.2002 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service</p>

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PSB

		<p>record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
29.	Mr. Fazal Mabood	<p>His date of birth is 07.04.1963. He joined government service on 14.09.1999 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
30.	Mr. Qazi Muhammad Jalalud Din	<p>His date of birth is 16.03.1973. He joined government service on 01.07.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
31.	Mr. Noor Muhammad	<p>His date of birth is 28.01.1973. He joined government service on 24.08.2000 in BS-17 and was promoted to BS-18 on 22.04.2014. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
32.	Mr. Usman Ali Khan	<p>His date of birth is 10.05.1972. He joined government service on 31.05.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. According to the Department, disciplinary proceedings are under process against him.</p> <p>The Board recommended to defer his promotion.</p>

Attest
[Signature]
 Director
 Board of Studies
 Establishment Department

15

170

33.	Mr. Fazal Karam	<p>His date of birth is 15.04.1967. He joined government service on 01.09.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
34.	Mr. Ilyas ud Din	<p>His date of birth is 13.07.1973. He joined government service on 01.06.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
35.	Mr. Abdur Rehman	<p>His date of birth is 10.05.1975. He joined government service on 06.06.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
36.	Mr. Rabih Azhar	<p>His date of birth is 10.03.1969. He joined government service on 11.07.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
37.	Mr. Nizamud Din	<p>His date of birth is 11.12.1972. He joined government service on 12.07.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service</p>

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		<p>record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
38.	Mr. Khadim Shah	<p>His date of birth is 01.04.1966. He joined government service on 24.03.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
39.	Mr. Mumtaz Ali	<p>His date of birth is 14.10.1968. He joined government service on 01.09.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
40.	Mr. Walayat Khan	<p>His date of birth is 08.01.1975. He joined government service on 31.03.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
41.	Mr. Safdar Ali	<p>His date of birth is 05.05.1964. He joined government service on 01.06.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post</p>

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17

172

PSB meeting held on 23.09.2019.

		of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.
42.	Mr. Zahid Hussain	<p>His date of birth is 15.03.1973. He joined government service on 01.06.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
43.	Syed Bashir Ahmad	<p>His date of birth is 16.02.1972. He joined government service on 01.04.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>
44.	Mr. Arif Jamil	<p>His date of birth is 31.03.1974. He joined government service on 01.05.2000 in BS-17 and was promoted to BS-18 on 27.05.2013. He has undergone training mandatory for promotion. No enquiry is pending against him. His service record upto 2018 is generally good.</p> <p>The Board recommended the Officer for promotion to the post of Associate Professor BS-19 on regular basis. He will be on probation for a period of one year.</p>

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 BOARD OF SENIORS
 UNIVERSITY OF PUNJAB
 LAHORE

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWER CAMP AT D.I.KHAN.

Appeal No: 1052 OF /2019

Hafiz Inayat Ullah Assistant Professor of Islamiyat Government Degree College No-1 D.I.Khan.

“VERSUS”


1. Secretary Higher Education Department Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education Department Khyber Pakhtunkhwa Peshawar.
3. Deputy Director (Establishment) Higher Education Department Khyber Pakhtunkhwa Peshawar.
4. Principal Government Degree College for Boys Dera Ismail Khan.
5. District Accounts Kechary Road D I Khan.
6. Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar.
7. Provincial Selection Board Peshawar through its Chairman/Chief Secretary KPK Peshawar.

Respectfully (Sheweth)

Para wise Reply of the respondent No (5) are as under:

- Para (1) Para not related to Respondent No (5) being administrative matter.
- Para (2) As above para no 01.
- Para (3) Para related to Respondent No (4).
- Para (4) As above para no 03.
- Para (5) Para not related to Respondent No (5) being administrative matter.
- Para (6) Para related to Respondent No (1) being administrative matter.
- Para (7) Incorrect/Not Admitted Para not related to Respondent No (5).
- Para (8) As above para no. 07.
- Para (9) Para not related to Respondent No (5).
- Para (10) As above para no. 09.

It is therefore, humbly prayed that as acceptance of above mentioned para wise reply, that the name of Respondent No (5) may graciously be exclude from the penal of Respondents.


District Accounts Officer,
Dera Ismail Khan.
(Respondent No 5)

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWER CAMP AT D.I.KHAN.**

Appeal No: 1052 OF /2019

Hafiz Inayat Ullah Assistant Professor of Islamiyat Government Degree College No-1 D.I.Khan.

“VERSUS”

1. Secretary Higher Education Department Khyber Pakhtunkhwa Peshawar.
2. Director Higher Education Department Khyber Pakhtunkhwa Peshawar.
3. Deputy Director (Establishment) Higher Education Department Khyber Pakhtunkhwa Peshawar.
4. Principal Government Degree College for Boys Dera Ismail Khan.
5. District Accounts Kechary Road D I Khan.
6. Government of Khyber Pakhtunkhwa through Chief Secretary Peshawar.
7. Provincial Selection Board Peshawar through its Chairman/Chief Secretary KPK Peshawar.

AFFIDAVIT

I Mr. Saeed-ur-Rehman Distt Comptroller of Accounts Dera Ismail Khan do hereby solemnly affirms and declare that All the contents of para wise reply submitted by the Respondent No (5) are true and Correct to the best of my knowledge and belief. That nothing has been Concealed the Honorable Court.


DEPONENTS

Before Khyber Pakhtunkhwa Service Tribunal
Peshawar Camp at D. S. Khan

Dr. Hafiz Inayat Ullah v/s H. Edu deptt. etc

Appeal No: 1052/19

Application for the purpose
of reliance on comments
already submitted by
Respondents No: 1

NOT
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Respected Sir,

- ① That above-mentioned appeal is pending adjudication before the tribunal and is fixed for reply.
- ② That respondents no: 1 to 3 & 6, 7 have already submitted their comments which are main contestants. Therefore, respondent no. 4 hereby relies on the comments already submitted and doesn't submit any separate comments in this regard.
- ③ That the tribunal has got vast & ample powers to entertain application in hand.

Date: 24/02/2020

It is, therefore hereby
submitted that application
may kindly be accepted.

Principal, GDC NO: 1, DTK Respd:
No 4

Affidavit

I, Mr. Afsar Khan, Lecturer Law
GDC NO: 1, representing Respondent
No: 4; do hereby declare &
affirm on oath that nothing
has been concealed and
misconceived. All the contents
are true & correct to the
best of my knowledge.

24/02/2020

[Signature]

Principals GDC NO: 1 ----- Respondent: No 4

Attested
MEHREEN SABA
P.C. 1/1/2020
To 30/1/2020
OATH COMMISSIONER
24-2-2020



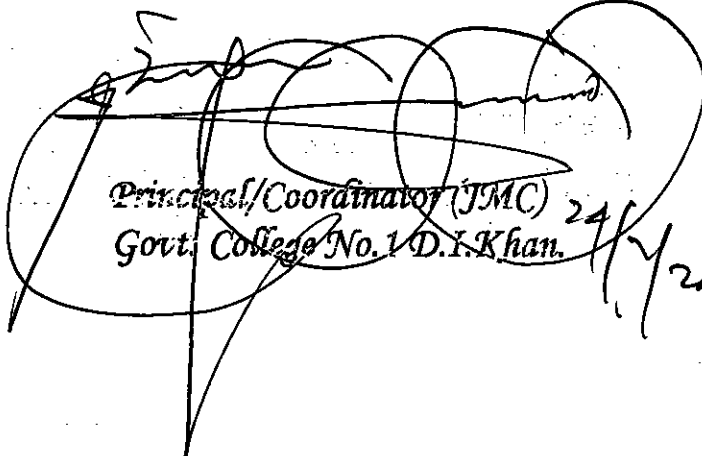
OFFICE OF THE PRINCIPAL/COORDINATOR
JOINT MANAGEMENT COUNCIL
GOVERNMENT COLLEGE NO. 1 DERA ISMAIL KHAN
Phone & Fax # 09669280134 Email: gc1deraismailkhan@gmail.com



AUTHORITY LETTER

Mr. Afsar Khan, Lecturer in Law Govt: College No. 1, D.I.Khan is hereby authorized to appear before KPK Service tribunal in case titled Hafiz Inayat Ullah vs Govt. KPK and to submit per wise comments etc. on behalf of the undersigned.

Dated: 24/02/2020


Principal/Coordinator (JMC)
Govt. College No. 1 D.I. Khan. 24/2/20