

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

In the matter of
Service Appeal No.163/2024.
Sajjad Ali (Ex-Senior Clerk)

.....Appellant.

VERSUS

1. The Government of Khyber Pakhtunkhwa, through Additional Chief Secretary Home and Tribal Affairs Department Peshawar.
2. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
3. The Additional Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
4. The Superintendent Circle Headquarters Prison Dera Ismail Khan.

.....Respondents.

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Deponent

19-03-24
Reader note
order sheet not uploaded.

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

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.....Appellant.

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3. The Additional Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
4. The Superintendent Circle Headquarters Prison Dera Ismail Khan.

.....Respondents.

SUBJECT: JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

NO.01 TO 04

Respectfully Sheweth:-

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12254

PRELIMINARY OBJECTIONS:

Dated 18-04-2024

- i. That the present service appeal is incompetent in its present form.
- ii. That the appellant has got no locus standi to file the instant appeal.
- iii. That the appellant is been estopped by his own conduct to file appeal.
- iv. That the appellant has not come to this Honorable Service Tribunal with clean hands.
- v. That the present appeal is bad for mis-joinder and non-joinder of necessary parties.
- vi. That the present appeal is badly Time-barred.
- vii. That the present appeal is not based on solid ground liable to be dismissed with cost.

OBJECTION ON FACTS:

1. Pertains to record.
2. Incorrect and not admitted. The appellant remained absent from official duty w.e.f 22/05/2023 till removal from service i-e 30/08/2023 without prior approval of the competent authority as reported by Superintendent Central Prison D.I Khan vide letter No.3314 dated 02/06/2023. Rest of the Para pertains to record.
3. Incorrect and not admitted. The Superintendent Sub jail tank vide his office memo No.942 dated 18/05/2023(**Annex-A**) relieved the appellant on the basis of instructions contained in the IG Prison office order bearing No.17916 dated 11/05/2023 and directed to report to the Superintendent Central Prison D.I Khan for further duty there and allowing him 03 days joining time. In consequences, he was required to report for duty there but he failed to join his duty well within time as was required. The Superintendent Central Prison D.I Khan vide his memo No.3314 dated 02/06/2023 requested the I.G Prison Khyber Pakhtunkhwa Peshawar that despite of clear direction contained in the Superintendent Sub Jail Tank Memo No. 942 dated 18/05/2023 he was due to report arrival for duty at CP DI Khan on 22/05/2023 (**Annex-B**) but he failed to report arrival for duty at this jail till date. Accordingly, the IG Prison office Memo No.21820 dated 12/06/2023(**Annex-C**) issued a Registered letter on appellant home address with the direction to resume your duty within 15 days on receipt of this notice and also

explain reasons of his willful absence from duty. In response of this Notice he did not report arrival for duty which is reflected on the report of Superintendent D.I Khan Jail Memo No.4277 dated 14/07/2023 (**Annex-D**) in which the Superintendent D.I Khan has submitted to worthy IG Prison that Mr.Sajjad Ali Senior Clerk has not reported till date i-e 14/07/2023. As was required under Rule 9 of KP E&D Rule 2011,the IG Prison office vide his Memo No.26374 dated 18/07/2023 requested to Director Information to issue Notice in Urdu Version for publication in 02 daily reading newspapers which he did accordingly as reflected in daily Aaj dated 25/07/2023 (**Annex-E**) in daily Shehbaz dated 22/07/2023 (**Annex-F**) but despite of these publications he did not report for duty which was strengthen on the report of Supdt DI Khan Memo No.4855 dated 16/08/2023(**Annex-G**) that the appellant till date has not reported arrival till date. The competent authority after exhausting the codalformalities as laid down in E&D Rules 2011 awards him Major Penalty in shape of Removal from Service attached to CP DI Khan vide IG Prionsn office order No.31450 dated 30/07/2023(**Annex-H**).

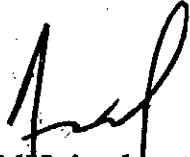
4. Admitted to the extent that departmental appeal on 08/09/2023 before the appellant authority (Additional Chief Secretary Home) while the appellant was called for personal hearing on 08/11/2023(**Annex-I**) to appear before the worthy Special Secretary Home but the appellant did not attend the office of Special Secretary-I for personal hearing. The appellant authority ultimately rejected his departmental appeal vid eHome Department order dated 13/11/2023(**Annex-J**). Accordingly, the decision of the competent authority was conveyed to Superintendent Central Prison D.I Khan for information to the appellant vide IG Prison office letter No.42877 dated 20/11/2023(**Annex-K**).
5. Incorrect and not admitted. Detail reply is elaborated in Para-04 above.
6. Incorrect and not admitted. The order of the competent authority as well as the appellate authority are according to law after observing all codal formalities and no discrimination has been committed by the respondents with the appellant.

GROUND.

- A. Incorrect and not admitted. Detail reply is elaborated in Para-06 above.
- B. Incorrect and not admitted. Detail reply is elaborated in Para-04 above.
- C. Incorrect and not admitted. Detail reply is elaborated in Para-03 above.
- D. Incorrect and not admitted. Detail reply is elaborated in Para-03 above.
- E. Incorrect and not admitted. Detail reply is elaborated in Para-03 above.
- F. Incorrect and not admitted. Detail reply is elaborated in Para-04 above.
- G. No comments.
- H. Pertains to the Honorable Tribunal proceedings.
- I. That the respondents would also seek permission of this Honorable Service Tribunal to raise additional grounds/objections at the time of arguments.

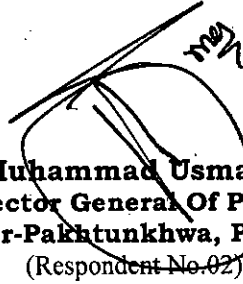
PRAYER :

It is, therefore, most humbly prayed that on acceptance of this instant reply/joint para wise comments on behalf of the respondent No.01 to 04, the appeal of the appellant may please kindly be dismissed with cost, being devoid of merit and law.

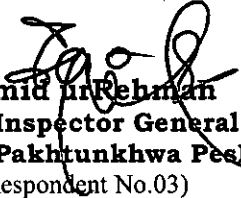


Mr. Abid Majeed
Additional Chief Secretary
Home & Tribal Affairs Department
Khyber Pakhtunkhwa, Peshawar
(Respondent No.01)

Additional Chief Secretary
Home & T.As Department
Khyber Pakhtunkhwa.



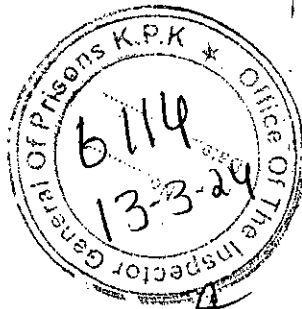
Muhammad Usman
Inspector General Of Prisons
Khyber-Pakhtunkhwa, Peshawar
(Respondent No.02)



Hamid ur Rehman
Additional Inspector General of Prisons
Khyber Pakhtunkhwa Peshawar
(Respondent No.03)



Sami Ullah Khan
Superintendent Circle Headquarter
Prison D.I Khan
(Respondent No.4)



13-3

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

In the matter of
Service Appeal No.163/2024.
Sajjad Ali (Ex-Senior Clerk)

.....**Appellant.**
VERSUS

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.....**Respondents.**

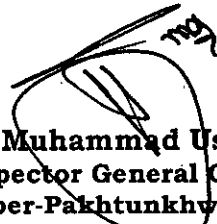
COUNTER AFFIDAVIT ON BEHALF OF THE RESPONDENTS No. 1 to 4.

We, the following undersigned respondents do hereby solemnly affirm and declare that the contents of the joint Para-wise comments in the above cited appeal are true and correct to the best of our knowledge and belief and that no material/ facts have been kept concealed from this Honorable Service Tribunal. We further stated on oath that in this case, the answering respondents have neither been made ex-parte nor their defense has been struck off.

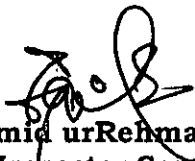


Mr. Abid Majeed
Additional Chief Secretary
Home & Tribal Affairs Department
Khyber Pakhtunkhwa, Peshawar
(Respondent No.01)

Additional Chief Secretary
Home & T.As Department
Khyber Pakhtunkhwa.



Muhammad Usman
Inspector General Of Prisons
Khyber-Pakhtunkhwa, Peshawar
(Respondent No.02)

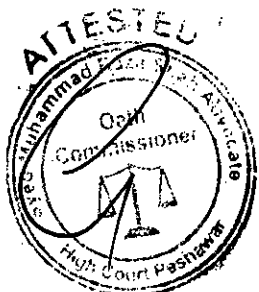


Hamid ur Rehman
Additional Inspector General of Prisons
Khyber Pakhtunkhwa Peshawar
(Respondent No.03)



Sami Ullah Khan
Superintendent Circle Headquarter
Prison D.I Khan
(Respondent No.4)

05 APR 2024



05 APR 2024



OFFICE OF THE SUPERINTENDENT
SUB-JAIL TANK

Tele & Fax: 0963-512052 Email: jluptank@gmail.com

No. _____ Date: 18/05/2023

To,

Mr. Sajjad Ali
Senior Clerk (BPS-14)
Attached to Sub-Jail Tank

Subject:- RELEIVING DOCKET

Memo:

Under the instruction contained in the Worthy Inspector General Of Prisons Khyber Pakhtunkhwa, Peshawar order bearing No: **17916** dated: **11-05-2023**, you are hereby relieved of your duty at this Jail today on **18/05/2023** and directed to report to the Superintendent Central Prison D.IKhan for further duty there.

You are allowed (3) days joining time.

SUPERINTENDENT
SUB-JAIL TANK

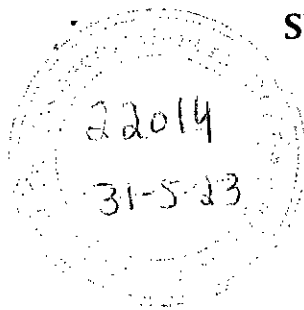
Endst No: 943-461

Dated: 18-05-23

Copy of the above is forwarded to the :-

1. Worthy Inspector General Of Prisons Khyber Pakhtunkhwa, Peshawar for information w/r to his order No. as referred above please.
2. Superintendent Central Prison D.IKhan for information .
3. District Account Officers Tank & D.IKhan for information and necessary action .

Assistant Director
Inspectorate General of Prisons
Khyber Pakhtunkhwa Peshawar



SUPERINTENDENT
SUB-JAIL TANK



OFFICE OF THE
SUPERINTENDENT

CENTRAL PRISON D.I.KHAN

0966-9280299 @cpdikhankg@gmail.com

No. 33/4 /Date: 02-06-2023

87

To,

The Inspector General Of Prisons,
Khyber Pakhtunkhwa, Peshawar.

Explained

Subject: NON-ARRIVAL OF SENIOR CLERK MR. SAJJAD ALI

M/W

Respected Sir,

It is submitted that Mr. Sajjad Ali Senior Clerk under transfer from Sub Jail Tank to Central Prison D.I.Khan was relieved by Superintendent Sub Jail Tank on 18.05.2023 vide No. 942 dated 18.05.2023 with 03 days joining time. He was due to report arrival for duty at Central Prison D.I.Khan on 22.05.2023 but he failed to report arrival for duty at this jail till date.

Report submitted for further necessary action please.

[Handwritten signature]

SUPERINTENDENT
CENTRAL PRISON DIKHAN

23099

5-6-23

[Handwritten signature]
6/6/23

Attest
ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE

SUPERINTENDENT

CENTRAL PRISON D.I.KHAN

0966-9280299 | epdikhan1@gmail.com

No. 33/4 / Date: 02-06-2023

To,

The Inspector General Of Prisons,
Khyber Pakhtunkhwa, Peshawar.

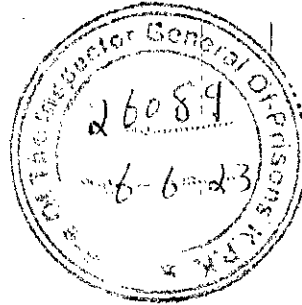
Subject: NON-ARRIVAL OF SENIOR CLERK MR. SAJJAD ALI

Respected Sir,

It is submitted that Mr. Sajjad Ali Senior Clerk under transfer from Sub Jail Tank to Central Prison D.I.Khan was relieved by Superintendent Sub Jail Tank on 18.05.2023 vide No. 942 dated 18.05.2023 with 03 days joining time. He was due to report arrival for duty at Central Prison D.I.Khan on 22.05.2023 but he failed to report arrival for duty at this jail till date.

Report submitted for further necessary action please.

SUPERINTENDENT
CENTRAL PRISON DIKHAN



Attest
[Signature]
ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

☎ 091-9210334, 9210406 📠 091-9213445

No. 2-19-21820-1

Dated 12-06-2023

URGENT/REGISTERED

To,

Mr. Sajjad Ali, Senior Clerk,
Postal Address, Gali Naeem Wali Mohallah Sudyanwala,
House No. 225/C District D.I.Khan.
(Contact # 0315-9501078)

Subject: **ABSENCE FROM DUTY**

Memo:

On the eve of your transfer from Sub Jail Tank to Central Prison D.I.Kahr Superintendent Sub Jail Tank relieved you on 18-05-2023 (F.N) with allowing 03 days joining time. Thus, you were supposed to arrive at Central Prison D.I.Khan on 22-05-2023 for further duty there. But you failed to do so and remained absent till date, without any prior permission/intimation of the competent authority.

You are, therefore, directed to resume your duties within 15 days on receipt of this notice and also explain reasons of your willful absence from duty. In case of failure, ex parte action under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 will be initiated against you which may result in your "Removal from Service".

DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Endst; No. 21821 /

Copy of the above is forwarded the Superintendent Central Prison D.I.Khan for information with reference to his letter No. 942 dated 18-05-2023.

ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE
SUPERINTENDENT

CENTRAL PRISON D.I.KHAN
0966-9280299 @cpdikhan1@gmail.com
No. 4273 / Date: 19-07-2023

To,


The Inspector General Of Prisons,
Khyber Pakhtunkhwa, Peshawar.


Subject: **NON-ARRIVAL OF SENIOR CLERK MR. SAJJAD ALI**

Respected Sir,

It is submitted that Mr. Sajjad Ali Senior Clerk has not reported arrival till date
14.07.2023.

Report submitted for further necessary action please.


SUPERINTENDENT
CENTRAL PRISON DIKHAN


ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

35267
24-7-23



INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. 257-19 - 26374 I-WE

Dated 18-07-2023

To,

The Director Information,
Khyber Pakhtunkhwa Peshawar

Subject: **NOTICE FOR WILLFUL ABSENCE FROM DUTY**

Sir,

I am directed to refer to the subject and forward herewith seven copies of the notice in Urdu version for publication in two daily leading Newspapers. Funds to meet the expenditure are available during the current financial year 2023-24.

18/7/2023
ASSISTANT DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Endst: No. 26375 - 767-^{ur}

Copy of the above alongwith a copy of Urdu version notice is forwarded to:

1. The Superintendent Central Prison D.I.Khan for information with reference to his letter No.3314 dated 02-06-2023 & letter No. 4273 dated 14-07-2023
2. Mr. Sajjad Ali Senior Clerk, Postal Address, Gali Naeem Wali Mohallah Sudyawala, House No. 255/C District D.I.Khan for information with reference to this office registered notice No. 7/2-J-19-21820 dated 12-06-2023.

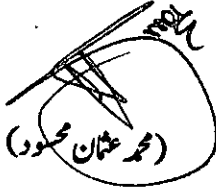
18/7/2023
ASSISTANT DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Attest
ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

اظہار وجوہ نوٹس غیر حاضری

ہر گاہ کہ آپ مسی سجاد علی (سینئر کلرک) گلی نعیم ولی محلہ سودیا نوالہ گھر نمبر C/255 ضلع ڈیرہ اسماعیل خان، مورخہ 22-05-2023 سے اپنی ڈیوٹی اور دفتر سے تاحال غیر حاضر ہو۔ آپ کو دفتر انسپکٹر جنرل جیل خانہ جات خیبر پختونخواہ کی طرف سے آپ کے گھر کے پتہ پر رجسٹرڈ نوٹس نمبر 21820 مورخہ 12-06-2023 غیر حاضری ارسال کیا گیا۔ جس میں آپ کو ہدایت کی گئی کہ آپ پندرہ دن کے اندر اندر سنٹرل جیل ڈیرہ اسماعیل خان میں ڈیوٹی پر حاضر ہو جائیں۔ اور اپنی غیر حاضری کی معقول وجہ بیان کریں لیکن پندرہ دن گزرنے کے باوجود آپ ڈیوٹی پر حاضر نہیں ہوئے اور تاحال اپنی ڈیوٹی سے بغیر کوئی اطلاع غیر حاضر ہو۔

لہذا آخری بار بذریعہ نوٹس ہذا آپ کو متنبہ کیا جاتا ہے کہ آپ اس نوٹس کی اشاعت کے 15 دنوں کے اندر اندر سنٹرل جیل ڈیرہ اسماعیل خان میں سپرنٹنڈنٹ جیل کے روبرو پیش ہو کر اظہار وجوہ برائے غیر حاضری پیش کریں کہ کیوں نہ آپ کے خلاف تادیبی کارروائی کی جائے۔ عدم تعمیل کی صورت میں آپ کے خلاف قاعدہ نمبر 109 انظباطی و ضوابطی مجریہ 2011ء کے تحت یکطرفہ کارروائی عمل میں لائی جائیگی۔ جو آپ کی ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔


 (محمد عثمان محمود)

انسپکٹر جنرل جیل خانہ جات صوبہ خیبر پختونخواہ پشاور


 ASSISTANT DIRECTOR
 INSPECTORATE GENERAL OF PRISONS
 KHYBER PAKHTUNKHWA PESHAWAR



ASSISTANT DIRECTOR
INSPECTOR GENERAL OF PRISONS
MINER PAKHUNJAWA PESHAWAR

(دخلائام مہر مہارک)

میں لائی جا سکتی۔

عدالت سے ہاری کیا گیا۔ مہر مہارک سٹیشن ۱۱۱۱۱۱۱۱

اظہار وجوہ نوٹس غیر حاضری

ہر گاہ کہ آپ مسکی سجاد علی (سینئر کلرک) گلی نعیم ولی محلہ سوڈیا نوالہ گھر نمبر C 255/ ضلع ڈیرہ اسماعیل خان، مورخہ 22-05-2023 سے اپنی ڈیوٹی اور دفتر سے تاحال غیر حاضر ہو آپ کو دفتر انسپکٹر جنرل جیل خانہ جات خیبر پختونخوا کی طرف سے آپ کے گھر کے پتہ پر رجسٹرڈ نوٹس نمبر 21820 مورخہ 12-06-2023 غیر حاضری ارسال کیا گیا جس میں آپ کو ہدایت کی گئی کہ آپ پندرہ دن کے اندر اندر سنٹرل جیل ڈیرہ اسماعیل خان میں ڈیوٹی پر حاضر ہو جائیں اور غیر حاضری کی معقول وجہ بیان کریں لیکن 15 دن گزرنے کے باوجود آپ ڈیوٹی پر حاضر نہیں ہوئے اور تاحال اپنی ڈیوٹی سے بغیر کوئی اطلاعیں غیر حاضر ہو۔ لہذا آخری بار بذریعہ نوٹس ہذا آپ کو متنبہ کیا جاتا ہے کہ آپ اس نوٹس کی اشاعت کے 15 دنوں کے اندر اندر سنٹرل جیل ڈیرہ اسماعیل خان سپرنٹنڈنٹ جیل کے رو برو پیش ہو کر اظہار وجوہ برائے غیر حاضری پیش کریں کہ کیوں نہ آپ کے خلاف تادیبی کارروائی کی جائے و عدم تعمیل کی صورت میں آپ کے خلاف قاعدہ نمبر 109 انضباطی و ضوابطی مجریہ 2011ء کے تحت ٹیکٹرفہ کارروائی عمل میں لائی جائیگی جو آپ کی ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔

INF(P)1707/2023

(محمد عثمان محسود)

انسپکٹر جنرل جیل خانہ جات صوبہ خیبر پختونخوا پشاور

<https://daillyshahbaz.com>

info@daillyshahbaz.com

ABC
CERTIFIED

ہمارے ہم نے تمہیں تو سوں اور قبیلوں میں اس لیے جسے کیا تاکہ بیٹیاں نہ جا سکیں۔ (القرآن)

آزاد صحافت کا علمبردار

DAILY SHAHBAZ PESHAWAR

روزنامہ
شہزاد

سالِ اشاعت 1940ء

Attes

ASSISTANT DIRECTOR
INSPECTOR GENERAL OF PRISONS
KHULAK PAKHTUNKHWA PESHAWAR

شمارہ نمبر 281

پتہ: 222 جولائی 2023ء، 3، محمد المورام، 4445 بریلی

جلد نمبر 97

اظہارِ وجہ ذمہ نگیں غیر حاضری

برآمدگی کی سہولتی (ریجنر لاک) آئی ایم ایس سولہ کی طرف سے 235/16 کے تحت کی گئی ہے۔

97

سے تعلق رکھنے والے سب سے پہلے کی طرف سے کی گئی ہے۔

12-06-2023 کی تاریخ پر سولہ کی طرف سے کی گئی ہے۔

اور سولہ کی طرف سے کی گئی ہے۔

پیش کردہ وجوہات

اور سولہ کی طرف سے کی گئی ہے۔

اور سولہ کی طرف سے کی گئی ہے۔

اور سولہ کی طرف سے کی گئی ہے۔

(رکھتا ہے) ایگزیکٹو جنرل جیل خانہ

123/10001 (1) (1) (1) (1)

Assistant Director
Inspectorate General of Prisons
Khyber Pakhtunkhwa Peshawar



OFFICE OF THE
SUPERINTENDENT

CENTRAL PRISON D.I.KHAN

0966-9280299 ☒ cpdikhan1@gmail.com
No. 4855 /Date: 16-8-23

To,

The Inspector General Of Prisons,
Khyber Pakhtunkhwa, Peshawar.


Subject: **NOTICE FOR WILLFUL ABSENCE FROM DUTY.**


Respected Sir,

Kindly refer to your office Endst: No.26375-76 dated 18.07.2023.

It is submitted that Mr. Sajjad Ali Senior Clerk has not reported arrival till date i.e 16.08.2023.

Submitted please.


SUPERINTENDENT
CENTRAL PRISON DIKHAN


ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

37186
21-8-23
22/2/23



**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

091-9210334, 9210406

091-9213445

No. 7/2-J-19-31450 /-

Dated 30-08-2023 /-

ORDER

WHEREAS, Mr. SAJJAD ALI, SENIOR CLERK (BPS-14) attached to Central Prison D.I.Khan absented himself from duty with effect from 22-05-2023 till date without prior permission of the competent authority as reported by Superintendent Central Prison D.I.Khan vide letter No. 3314 dated 02-06-2023. A notice was also served on him at his home address vide this office letter No. 7/2-J-19-21820 dated 12-06-2023 with the direction to resume his duties immediately failing which disciplinary action could be initiated against him under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

AND WHEREAS, after expiry of more than 15 days period, the said official neither resumed duty nor any intimation was received from him, therefore, as required under Rule-9 of ibid rules, a notice was published in two daily newspapers i.e Roznama Shahbaz dated 22-07-2023 & Roznama Aaj dated 25-07-2023 by directing him to resume duty within 15 days of publication of the notice. But after lapse of stipulated period given in the notice, he neither resumed his duty nor any response was received from his end as confirmed by Superintendent Central Prison D.I.Khan vide his letter No. 4855 dated 16-08-2023.

NOW THEREFORE, in exercise of powers conferred under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the undersigned being competent authority, hereby awards major penalty of "**Removal from Service**" to **Mr. Sajjad Ali, Senior Clerk (BPS-14)** attached to Central Prison D.I.Khan from the date of his willful absence i.e. **22-05-2023**.

**INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR**

Endst; No. 31451-55 /,

Copy of the above is forwarded to:

1. The Secretary to Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department for information.
2. The Superintendent, Central Prison D.I.Khan for information, and necessary action with reference to his letter No. 4855 dated 16-08-2023.
3. The District Accounts Officers concerned for information.
4. Mr. Sajjad Ali S/O Abdul Majeed Khan, Senior Clerk (BPS-14) P/O Gali Naeem Wali Mohallah Sudyanwala, House No. 225/C District D.I.Khan Phone No. 0315-9501078 for information.
5. Confidential Clerk for placing a copy of the said order in his character roll.

Asst. Dir.
**ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

[Signature]
**DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR**



**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

☎ 091-9210334, 9210406 📠 091-9213445

No. 2-J-19-41161-1-115

Dated 07-11-2023

MOST IMMEDIATE/PERSONAL HEARING

To,

The Superintendent,
Central Prison D.I.Khan

Subject:

**DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE IMPUGNED
REMOVAL FROM SERVICE ORDER NO. 3145-55 DATED 30-08-2023 VIDE
WHICH THE APPELLANT IS REMOVED FROM SERVICE WITHOUT ANY
LAWFUL JUSTIFICATION**

Memo;

I am directed to refer to the subject and to forward herewith a copy of Home Department letter No. SO(Prison-I)/HD/8-3/2018/Vol-II dated 06-11-2023 (self-explanatory) for information and necessary action.

Please inform Mr. Sajjad Ali, Senior Clerk (BPS-14) to appear before the Worthy Additional Chief Secretary, Home & Tribal Affairs Department on 08-11-2023 at 11:00 am in his office for personal hearing in the subject cited case.

c/c
DEPUTY DIRECTOR (E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Endst: No. 41162-631

Copy of the above is forwarded to the:

1. Additional Chief Secretary to the Government of Khyber Pakhtunkhwa Home & TA's Department for information with reference to Home Department letter No. referred to above please.
2. Mr. Majid Ghufraan, Deputy Director (Admin) for information. He is directed to attend the personal hearing in the office of Worthy Additional Chief Secretary, Home & Tribal Affairs Department, on the fixed date and time mentioned above alongwith complete record please.

c/c
DEPUTY DIRECTOR (E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Alles
ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



GOVERNMENT OF KHYBER PAKHTUNKHWA,
HOME & TRIBAL AFFAIRS DEPARTMENT

NO. SO (Prison-I)/HD/8-3/2018/Vol-II
Peshawar dated the 13th November, 2023.

To,

The Inspector General of Prisons,
Khyber Pakhtunkhwa,

Subject: - DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE
IMPUGNED REMOVAL FROM SERVICE ORDER NO. 31451-55
DATED 30.08.2023 VIDE WHICH THE APPELLANT IS REMOVED
FROM SERVICE WITHOUT ANY LAWFUL JUSTIFICATION.

Dear Sir,

I am directed to refer to your letter No. 7/2-J-19-35348 dated 25.09.2023 on the subject noted above and to state that personal hearing to Mr. Sajjad Ali, Senior Clerk (BPS-14), Inspectorate of Prisons Khyber Pakhtunkhwa, was held on 08th November, 2023 in the office of Special Secretary-I, Home & Tribal Affairs. The appellant did not attend the office of Special Secretary-I for personal hearing. His case was proceeded under E&D Rules, 2011.

2. The appellate Authority has decided to reject the appeal of Mr. Sajjad Ali, Senior Clerk (BPS-14), Inspectorate of Prisons, Khyber Pakhtunkhwa, please.

Yours faithfully,

Section Officer (Prison-I)

Endst: of even No & date:-

Copy forwarded for information and further necessary action to the:

1. PS to Additional Chief Secretary, Home Department, Khyber Pakhtunkhwa.
2. Master file.

Section Officer (Prison-I)

Assistant Director
Inspectorate General of Prisons
Khyber Pakhtunkhwa Peshawar



**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

☎ 091-9210334, 9210406 🏠 091-9213445

No. 7/2-J-19-42877-1-WK

Dated 20-11-2023

To,

The Superintendent,
Central Prison D.I.Khan

Subject: **DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE IMPUGNED
REMOVAL FROM SERVICE ORDER NO. 3145-55 DATED 30-08-2023 VIDE
WHICH THE APPELLANT IS REMOVED FROM SERVICE WITHOUT ANY
LAWFUL JUSTIFICATION**

Memo;

I am directed to refer to this office endorsement No. 35349-50 dated 25-09-2023 on the subject and to forward herewith a copy of Home Department letter No. SO(Prison-I)/HD/8-3/2018/Vol-II dated 13-11-2023 on the captioned subject (self-explanatory) for information and necessary action.

Please inform the Ex-Official concerned accordingly.

[Signature] 20.11.23
DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Endst.No. 42877-1

Copy of the above is forwarded to the Additional Chief Secretary to the Government of Khyber Pakhtunkhwa Home & TA's Department for information with reference to Home Department letter No. referred to above please.

[Signature] 20.11.23
DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

[Signature]
ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR



OFFICE OF THE
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR
☎ 091-9210334, 9210406 📠 091-9213445

No. _____

Dated _____

AUTHORITY LETTER

Mr. Sulaiman, Law Officer (BPS-17) attached to the office of Inspector General of Prisons Khyber Pakhtunkhwa Peshawar is hereby authorized to make affidavit, to file comments/reply/report and to attend the Lower Courts, Ombudsperson, Khyber Pakhtunkhwa Service Tribunal, Peshawar High Court Peshawar, Supreme Court of Pakistan Islamabad, Federal Shariat Court, meeting of scrutiny committee at Law Department and also to attend the office of Advocate General Khyber Pakhtunkhwa at Peshawar on each and every date of hearing, on behalf of the Inspector General of Prisons Khyber Pakhtunkhwa.


**INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**