

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR.

C.M No. _____/2024

In S.A No. 154/2022

MUHAMMAD RASHID

VS

GOVT. OF KHYBER PAKHTUN KHWA, ETC

Index

S/NO	SUBJECT	ANNEXURE	PAGE NO
1	Civil Misc. Application for placing additional documents		1
2	Affidavit		2
3	Copies of sanctioned / vacant posts, along with seniority list etc	AA	3-8

Dated: 11-07-2024

Through

Plaintiff


Tajdar Faisal Khan Mina Khel
Advocate High Court

①

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR.

C.M No. _____/2024
In S.A No. 154/2022

MUHAMMAD RASHID
VS
GOVT. OF KHYBER PAKHTUN KHWA, ETC

Khyber Pakhtukhwa
Service Tribunal

Diary No. 14144

Dated 11/7/24

APPLICATION FOR AND ON BEHALF OF
APPLICANT/APPELLANT FOR PLACING ON FILE
RELEVANT RECORD REGARDING VACANT
POSITIONS OF LAB. SUPERINTENDENTS IN
HIGHER EDUCATION DEPARTMENT.

Respectfully Sheweth:

The applicant/appellant most humbly submits as under:

1. That the above captioned appeal is pending in this Hon'ble Tribunal, which is fixed for 11-07-2024 before Division Bench of this Hon'ble Tribunal.
2. That on previous date of hearing, during course of arguments, learned bench of this august tribunal asked about the vacant positions of lab. Superintendents in Higher Education Department. In order to get the relevant record, appellant moved an application to the department but they refused, so appellant through intervention of right to information commission got copies of the relevant record.
3. That as per seniority list of 2020, only six (06) posts of lab superintendents were filled while 20 were vacant and in 2021, 5 more became vacant due to retirement of some employees, so they filled 25 posts during 2021.

{Copies of vacant positions and seniority list is
attached, Annex-AA}

IT IS, THEREFORE, MOST HUMBLY SUBMITS
THAT WHILE ACCEPTING THE INSTANT
APPLICATION, RELEVANT RECORD
REGARDING VACANT POSITIONS OF
LABORATORY SUPERINTENDENTS MAY
KINDLY BE PLACED ON FILE.

Dated: 11-07-2024

Through

Applicant/Appellant


Tajdar Faisal Khan Mina Khel
Advocate High Court

2

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR.**

C.M No. _____/2024
In S.A No. 154/2022

MUHAMMAD RASHID

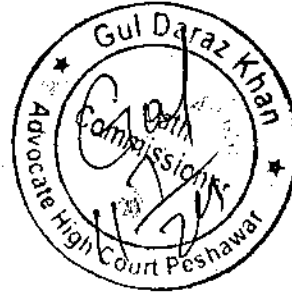
VS

Govt. of Khyber Pakhtun Khwa, ETC

AFFIDAVIT

I, Muhammad Rashid, Ex-Lab Supervisor, Govt. Post Graduate College, Lakki Marwat (resident of Shamoni Khattak, District Lakki Marwat) do hereby solemnly affirms and declare upon oath that the contents of the instant application are true and correct to the best of my knowledge and belief and nothing has been kept concealed or with-held from this Hon'ble Tribunal.


Deponent





Tel: (+92) 91-9216557
Fax: (+92) 91-9216561

GOVERNMENT OF KHYBER PAKHTUNKHWA
INFORMATION COMMISSION
Near Abdara BRT Station, behind Jabar Flats, Arbab Colony,
University Road Peshawar
www.kprti.gov.pk
Email: complaints@kprti.gov.pk

Annex-AA

3

No. KPIC/DR/11334/2024
Dated:

02 JUL 2024

27582
84

To

Mr. Muhammad Rashid,
Post Office Sarai Naurang, Shamoni Khattak,
District Lakki Marwat.

Sub:

**COMPLAINT AGAINST NON-SUPPLY OF INFORMATION UNDER KP
RTI ACT, 2013 (COMPLAINT NO. 11334)**

I am directed to refer to the subject noted above and to enclose herewith the requisite information received from Directorate of Higher Education, Khyber Pakhtunkhwa, Rano Ghari, Near Northern Bypass, Peshawar vide letter No. 9041/DDS. RTI/Vol-9 /Sports Section dated: 05/06/2024 regarding your case.

You are advised to confirm in writing the receipt of complete and relevant information within **Seven** days of the receipt of this letter.

In case we do not receive any response from you, your case will stand disposed of.



Deputy Registrar
KP. Information Commission,
Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, Khyber Pakhtunkhwa Information Commission, Peshawar.
2. Deputy Director Sports, Directorate of Higher Education, Khyber Pakhtunkhwa, Rano Ghari, Near Northern Bypass, Peshawar.

Accepted
[Signature]

Deputy Registrar
KP. Information Commission,
Peshawar.



**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
NEAR CHAMKANI MOURH
RANO GHARHE, PESHAWAR**

4

11334

Email: dhekpkesb@gmail.com

facebook.com/dhekpkesbawar

Registered.

twitter.com/dhekpkesbawar1

No. 9041 /DDS, RTI, Vol. 9 Sports Section

Dated 5/6/2024

KP-RTI COMMISSION	
Diary No:	13431
Date:	11-06-2024
Section:	

To:

The Assistant Registrar, KP Information Commission,
Near BRT Abdara Station, Arbab Colony, Opposite Jabar Flats
University Road Peshawar,

Subject: -

COPMLAINT AGAINST NON-SUPPLY INFORMATION (COPMLAINT NO 11334).

I am directed to refer to your office Letter No. KPIC/DR/1-11334/24/26748-50 Dated 23/5/2024 on the subject cited above and to state that a complete Information is submitted for further Necessary action as desired please.
(Copies Enclosed).

[Handwritten signature]
12/6

[Handwritten signature]
(Dr. Muhammad Arsan Khan)
DEPUTY DIRECTOR SPORTS


[Handwritten signature]
13/6
0.11/3

[Large handwritten signature]

5

S.No	Information Requested	Male	Female	Total
1	Sanctioned posts of Lab superintendents 2018-2022	26	11	37
2	Filled posts of Laboratory Superintendents in the Year 2020-2022	26	11	37
3	Vacant posts of Laboratory Superintendents in April 2021	25	5	30

Promotion on 19-11-2021

Attested


6

103

The Hon'ble Director

Higher Education Department, Peshawar.

Subject: Application under Right to Information Act for supply of certain record.

Respected Sir,

With profound respect, the applicant most humbly submits as under:

1. That the applicant few days ago visited directorate of Higher Education Department and requested the concerned authorized officer to provide him below mentioned documents:

- i. Sanctioned posts of Laboratory Superintendents since 2018 till 2022.
- ii. Filled posts of Laboratory Superintendents in the year 2020-22
- iii. Vacant posts of Laboratory Superintendents in April, 2021.
- iv. Seniority list of Laboratory Superintendents for the year 2018 till 2022.

2. That although the above mentioned documents are public documents and each and every person has the right to see them or get copies of them but the applicant was refused to take copies of them.

3. That now, the applicant under the Right To Information Act, most humbly requested that attested copies of above mentioned documents may kindly be supplied to him.

The applicant will be highly obliged.

(Signature)
 Director
 17/540-1679

Applicant

(Signature)
 Muhammad Rashid
 S/O Dilakash Khan
 R/O Shamoni Khattak,
 Distt: Lakki Marwat
 0333-5765335

Attested
(Signature)



DIRECTORATE OF HIGHER EDUCATION KHYBER PAKHTUNKHWA.

NOTIFICATION


In pursuance of Section 8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Final Seniority List of Lab Superintendent Male (BPS-16) as stood on 10.08.2020.

S.No.	Name	Father Name	Qualification	Date of Birth	Domicile	Date of Appointment as Lab Assistant	Date of Promotion to the present grade	Place of Posting
1	Iqbal Hussain	Sher Muhammad	M.A	08/09/1961	Mardan	01/11/1979	01/02/2016	GPGC, Mardan
2	Abdul Baseer	Rehman Gul	Matric	03/02/1961	Charsadda	20/03/1980	01/02/2016	GC, Peshawar
3	Umar Rashid	Gandari	F.A	30/04/1961	Swat	15/05/1980	01/02/2016	GDC, Dargal
4	Atifullah	Rafiqullah	F.A	06/10/1964	Charsadda	23/08/1980	01/02/2016	GPGC, Charsadda
5	Said Khan	Jhangir Khan	BA	12/12/1960	SWA	06/10/1980	12/05/2016 (Seniority has been granted)	GPCC, Kohat
6	Muhammad Avub	Saeed Khan	M.A	01/05/1961	Dir Lower	02/03/1981	01/02/2016	GPGC, Timergaz (Lower Dir)

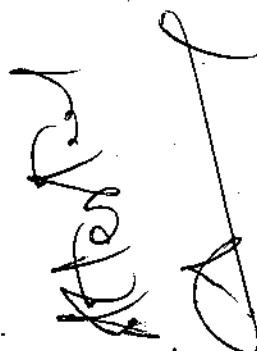
It is certified that the Seniority List is neither disputed nor sub-judiced in any court of law.

Endst. No. 4185-206 JCA-VIII/Estb. Branch
Copy of the above is forwarded to:-

1. Section Officer (Colleges-IV) Govt. of Khyber Pakhtunkhwa Higher Education Department
2. All JMC's Colleges Govt. of Khyber Pakhtunkhwa.
3. Deputy Director (IT), Local Directorate with the request that the same may be uploaded, please.
4. PA to Director Higher Education, Khyber Pakhtunkhwa


DEPUTY DIRECTOR (Academic)
HIGHER EDUCATION KHYBER PAKHTUNKHWA


DEPUTY DIRECTOR (Academic)
HIGHER EDUCATION KHYBER PAKHTUNKHWA





8



OFFICE OF THE PRINCIPAL/COORDINATOR JMC,
GOVERNMENT POST GRADUATE COLLEGE LAKKI MARWAT
Landline.0969-510562, E.mail gpgc.lakki@yahoo.com

Reference No.1/Lab: Supdt:

Dated:26th September,2023

POST LYING VACANT AVAILABILITY CERTIFICATE

Certified that a post of Laboratory Superintendent (BPS-16) remained lying vacant at GPGC,Lakki Marwat since 15-03-2018 (retirement of Mr.Shah Jahan, Lab: Supdt: on 14-03-2018 (AN) till 19-11-2021(arrival of Mr.Rawaid Ali, Lab: Supdt:).

Shah Jahan
PRINCIPAL
GPGC,Lakki Marwat
26/9/23

PRINCIPAL
G.P.G.C Lakki Marwat

Attested
[Signature]