26.06.2019

Counsel for the appellant and Addl: AG alongwith Mr. M. Sharif, ADEO for respondents present. Due to incomplete bench the case is adjourned to 30.08.2019 before D.B.

Reader

30.08.2019

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Vide separate/common judgment of today of this Tribunal placed on file of connected service appeal bearing No.519/2018, the impugned order of removal from service dated 13.12.2017 in relation to the appellant, is set aside and the appellant is reinstated in service and her absence period and the intervening period shall be treated as leave without pay. The appeal is accepted in the above noted terms. Parties are left to bear their own costs. File be consigned to the record room.

Ahmad Hassan) Member (Muhammad Hamid Mughal) Member

<u>ANNOUNCED.</u> 30.08.2019



20.02.2019 Learned counsel for the appellant present. Daud Jan

Superintendent representative of the respondent department

present. Learned counsel for the appellant seeks

adjournment to file application for the change of

nomenclature of respondents due to the merger of FATA in

Khyber Pakhtunkhwa. Adjourn. To come up for further

proceedings on 27.02.2019 before S.B.

Member 🦫

27.02.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Naseem Mehmood, ADO for respondents present. Written reply on behalf of respondents submitted which is placed on file. Counsel for the appellant is also submitted amended copy of memo of appeal. To come up for rejoinder and arguments on 15.05.2019 before D.B-

Member (Ahmad Hassan)

15.05.2019

Counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondents present.

Due to demise of his father, learned Member of the Bench (Mr. Hussain Shah) is on leave. Adjourned to 26.07.2019 for arguments before the D.B.

Chairman

10.10.2018

Counsel for the appellant Mr. Muhammad Saeed Khattak, Advocate present. Mr. Kabirullah Khattak, Addl. AG for the respondents present and made a request for adjournment. Granted. To come up for written reply/comments on 19.11.2018 before S.B.

Chairman

19.11.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG on behalf of the respondents present. Representative of the respondent-department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. Case to come up for written reply/comments on 08.01.2019 before S.B.

Muhammad Amin Khan Kundi Member

08.1.2019

Clerk of counsel for the appellant present.

Nemo for the respondents.

Notices be repeated to respondents for attendance and submission of written reply/comments on 20.02.2019 before S.B.

Chairman

27.06.2018

Appellant absent. Learned counsel for the appellant absent. Adjourned. To come up for preliminary hearing on 20.07.2018 before S.B.

Member

20.07.2018

None for the appellant present. Adjourned. To come up for preliminary hearing on **16**.08.2018 before S.B.

(Ahmad Hassan) Member

10.08.2018

Mr. Muhammad Saeed Khattak, Advocate counsel for the appellant present and heard in limine.

Contends that major punishment of removal from service has been imposed on the appellant on the ground that on 01.09.2017 she was found absent from her duty whereas from 01.09.2017 to 04.09.2017 were declared as public holidays.

Points raised need consideration. The appeal is admitted to full hearing, subject to all legal objections. 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 10.10.2018 before S.B.

Chairman

Appellant Raposited
Security Process Fee

Form-A FORMOF ORDERSHEET

. Court of_	 •	
		,
Case No.	525/2018 ₅	

	Case No.	. 525/2018.
.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	13/04/2018	The appeal of Mst. Mehnaz presented today by Mr. Muhammad Saeed Khattak Advocate may be entered in the
		Institution Register and put up to the Learned Member for
		proper order please. REGISTRAR /3 1 2
		REGISTRAR /5/4// 8
2-	13/04/18.	
Z-	(5/04/10)	This case is entrusted to S. Bench for preliminary hearing
		to be put up there on $36/04$
•		
٠.		MEMBER
	. 1	*
1	30.04.2018	Clerk of the counsel for appellant present. The Tribunal is
		nctional due to retirement of the Honorable Chairman. Therefore,
福 .	ca	se is adjourned. To come up for the same on 27.06.2018 before S.B.
-	,	1
		Reader
	,	

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Service Appeal No	525 /2018
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Mehna? (Appellant)

Vs

Director Education, & Another (Respondents)

INDEX

S#	DESCRIPTION OF DOCUMENTS	ANDICISE	D. 67
$\overline{1}$	Amended Memo of Service Appeal	ANNEX	PAGE
2		·	1-3
	Copy of Appointment Letter	A	4-7/5
3	Copy of publication	В	96
4	Copy of the reply		(2)
5	Copy of impugned Order dt 13.12.2017	D -	<u> 87</u>
6	Copy of Departmental Appeal	E	<u> </u>
7			
8	Copy of Press Release	F	13/10
-0	Copies of relevant pages of Attendance Register	G	11=13
9	Wakalatnama		146

Dated:-____

Appell

Through

Muhammad Saeed Khattak

Advocate, Peshawar Christian

D6, JK Shopping Mall,

University Road, Peshawar

Cell No. 03336272753

4

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Mst. Mehnaz Ex. PST, GGPS, Gulzari Garyun, Miran Shah, North Waziristan Agency (now District North Waziristan)...... (Appellant)

Versus

- 1. Director Education, FATA, (now KPK) Peshawar

AMENDED, SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, AGAINNST THE IMUGNED ORDER DATED 13.12.2017 PASSED BY RESPONDENT NO. 2 WHEREBY THE DEPARTMENTAL APPEAL DATED 05.01.2018 TO RESPONDENT NO. 1 HAS YET NOT BEEN DISOSED OF.

PRAYER-IN-APPEAL

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL THE IMPUGNED ORDER DATED 13.12.2017 PASSED BY RESPONDENT NO. 2 MAY VERY GRACIOUSLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE RE-INSTATED ON THE POST; WITH ALL BACK BENEFITS.

Respectfully Sheweth,

- 1. That, the appellant consequent upon the approval of Departmental Selection Committee was appointed as PTC (Female) in BPS 09 and took over charge of her duty on 14.04.2010.(Copy of the Charge Report is attached as annexure A)
- 2. That, after taking charge of her duties she performed her duties during the service whole heartedly and to the quite satisfaction of officials concerned as well as according to the demand and nature of the job.
- 3. That, the appellant came to know about a publication published in daily "Mashriq" dated 03.12.2017 regarding her absence from duty along with other female teachers. Furthermore according to the said publication a show

12

cause notice was issued to her. But the appellant has received no such notice. (Copy of the publication is attached as annexure B)

- 4. That, in compliance the appellant submitted a reply in the office of respondent No. 2 along with relevant documents in her defense. (Copy of the reply is attached as annexure C)
- 5. That, thereafter the respondent No. 2 vide impugned order dated 13.12.2017 removed the appellant from service against all the norms of justice. (Copy of the impugned order dated 13.12.2017 is attached as annexure D)
- 6. That, being aggrieved of the same the appellant preferred an appeal before respondent No. 1 on 03.01.2018 which has yet not been responded. (Copy of the departmental appeal is attached as annexure E)
- 7. That, the appellant now prefers the instant Service Appeal, inter alia, on the following amongst others;

GROUNDS

- A. That, the appellant has not been treated in accordance with law nor has equal protection of law has been extended to her. The so called visit mentioned in the notification dated 13.12.2017 is illegal, against law, without lawful authority, void ab initio for the reason it has been passed on the ground of remaining absent from the duty on 01.09.2017. On the said date public holiday was notified. Therefore the mentioned notification dated 13.12. 2017 and all proceedings thereafter based on it are illegal and liable to be set aside.
- **B.** That, according to notification dated 13.12.2017 (Impugned herein) in its first para that appellant was found absent from duty during monitoring visit of the

concerned Assistant Agency Education Officer to the School on 01.09.2017. with due respect it is stated that according to Press Release dated Islamabad 23rd August 2017 it was notified for the general information that 1st to 4th September 2017 (Friday, Saturday, Sunday and Monday) shall be public holidays on the occasion of Religious Festival of Eid-ul-Azha: (Copy of the press release is attached as annexure F)

- C. That, it is quite astonishing that how Assistant Agency Education Officer managed the visits of too many schools on 01.09.20017 (which was public holiday) and only cases of non-local female teacher were reported.
- **D.** That, according to para 3 of the notification issued by respondent no. 2 the appellant did not report to her duty within stipulated period of time and turned deaf ear is quite baseless, wrong as well as against the record. As mentioned earlier the appellant remained present on her duty beside the mentioned date because it was a public holiday.
- E. That, while awarding major penalty no proper procedure was adopted. Otherwise too the impugned order has been passed with retrospective effect which is nullity in the eyes of law.
- F. That, any other ground can also be taken during the arguments with permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that the instant service appeal may be allowed as per prayer. Any other relief which has not been specifically asked for and deem fit in the circumstances of the case may also be granted to the appellant.

Dated:	Appel	lant 1
•	THROUGH	all
•	Muhammad	Saeed Khattak
•	Advocate, Pe	shawar
		malla

BEFORETHE K.P.K. SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. .525.../2018

Mst Mehnaz Ex. Primary School Teacher. (Appellant)

VERSUS

Director Education, FATA & another (Respondents)

INDEX

S.No.	Description of Documents	Annexure	Pages
01	Memo of Service Appeal		1-3
02	Copy of the appointment	A	4-5
03	Copy of the publication	В	6
04	Copy of the reply	С	7
05	Copy of the order dated 13-12-2017	D	8
06	Copy of the departmental appeal	E	9
08	Copy of the Press Release	F	/0
08	Copies of relevant pages of the attendance register	G	11-13
	Wakalatnama		14

Dated:-

Appellan

Through

Muhammad Saeed Khattak

Advocate, Peshawar.

Mob. 03336272753

BEFORE THE K.P.K. SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 525 /2018

Mst Mehnaz Ex. Primary School Teacher GGPS Gul Zare Garyum No Agency(Appellant	
<u>VERSUS</u>	Kayber Pekhtukhwa Service Tribunal
Director Education, FATA, KPK, Peshawar. Agency Education Officer, North Waziristan Agency at Miran Shah.	Diary No. 557
(Respondents	·- O

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 13 /12 /2017, PASSED BY RESPONDENT NO.2 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT TO RESPONDENT NO. 1 AGAINST THE ORDER DATED 13.12.2017 PASSED BY RESPONDENT NO. 2 IS/WAS NOT DISPOSED WITHIN STATUTORY PERIOD.

PRAYER - IN - APPEAL

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED ORDER DATED 13.12.2017
PASSED BY RESPONDENT NO. 2 MAY VERY GRACIOUSLY BE SET ASIDE AND THE
APPELLANT MAY KINDLY BE RE-INSTATED ON THE POST WITH ALL BACK BENEFITS.

Respectfully Sheweth;

 That the appellant consequent upon the approval of Departmental Education Committee was appointed as PTC (Female) in BPS 07 on 13.11.2002. (Copy of the appointment order is attached as annexure A)



- That the appellant thereafter took the charge of her duties and performed her duties during the service whole heartedly and to the quite satisfaction of officials concerned as well as according to the demand and nature of her duties.
- 3. That the appellant came to know about a publication published in daily "Mashriq" dated 03,12,2017 regarding an appellant's absence from the duty along with other female teachers. Further in the said publication a show cause notice has been mentioned, which is/was issued to the appellant but the appellant has received no show cause notice. (Copy of the publication is attached as annexure B)

- 4. That in compliance, the appellant submitted a reply in the office of respondent No. 2, the appellant submitted her reply on 08.12.2017 along with copies of relevant pages teachers attendance register. (Copy of the reply is attached as annexure C)
- 5. That thereafter the respondent No. 2 vide order dated 13-12-2017 removed the appellant from the service illegally, unlawfully and without going through the available record for the reasons best known to him. (Copy of the order dated 13-12-2017 is attached as annexure D)
- 6. That being aggrieved of the same the appellant preferred a departmental appeal before Respondent No.1 on which has not been decided till statutory period. (Copy of the departmental appeal is attached as annexure E.)
- 7. That the appellant now prefers the instant Service Appeal, inter alia, on the following amongst others;

GROUNDS

- A. That the appellant has not been treated in accordance with law nor has equal protection of law been extended to her. The so called visit mentioned in the notification dated 13-12-2017 is illegal, against law, without lawful authority, void ab initio for the reason it has been passed on the ground of remaining appellant absent from the duty on 01.09.2017. On the said date public holiday was notified. Therefore the mentioned notification dated 13-12-2017 and all proceedings thereafter based on it are illegal and liable to be set aside.
- B. That according to notification dated 13-12-2017 (impugned herein) in its first para that appellant was found willfully absent from duty during monitoring visit of the concerned Assistant Agency Education Officer to the School on dated 01.09.2017. With due respect it is stated that according to Press Release dated Islamabad 23rd August 2017 it was notified for the general information that 1st to 4th September 2017 (Friday, Saturday, Sunday and Monday) shall be public holidays on the occasion of Religious Festival of Eid-ul-Azha. (Copy of the Press Release is attached as annexure F)

- C. That it is quite astonishing that how Assistant Agency Education officer visited too many schools on 01.09.2017 (which was public holiday) and only cases of Non Local Female Teachers were reported.
- D. That according to para 3 of the notification issued by Respondent No. 2 that the appellant did not report to her duty within stipulated period of time and turned deaf ear is quite baseless, wrong as well as against the record. As mentioned earlier the appellant remained present on her duty beside the mentioned date, because it was notified public holiday. (Copies of relevant pages of the attendance register are attached as annexure G)
- E. That while awarding major penalty of removal from service no proper procedure was adopted, otherwise too the impugned order has been passed with retrospective effect which is nullity in the eyes of law.
- F. That any other ground can also be taken during the course of arguments with permission of this Hon'ble Tribunal.

It is therefore most humbly prayed that on acceptance of the instant appeal the impugned order dated 13.12.2017 passed Respondent No. 2 may very graciously be set aside and the appellant may kindly be reinstated on the post with all back benefits.

Any other relief which has not specifically asked for and deems fit in the circumstances of the case may also be awarded to the appellant.

Through

Muhammad Saeed Khattak

Advocate, Peshawar.

BEFORETHE K.P.K. SERVICE TRIBUNAL, PESHAWAR

Service Appeal No./2018

DIRECTORATE OF EDUCATION F.A. I.A. (N.W.F.P) PESHAWAR.

APPOINTMENT ORDER.

Committee are hereby appointed against the project post of PTC in BPS 7 for the Project period at Female Communical Schools noted against the limit taking over charge.

S.No. Name, Father Name, Place of Post, Miss Abidat Paroon D/Q Umer Faroon, FCS Amanullah N.W.Agency.

2. Miss Kalsoom, D/O Mir Sahib Khan apartase, do

Miss Mahnaz Bibi D/O Mohammad Islam. F.C.S.Bakhtullah Baber Khel Ali Khe NWA

5. Miss Ulfat Begum D/O Shah Mohammad. F.C.S.Mutaber Khan Kot N.W. Agency,

Note:

- 1. The employees shall serve the Govt: as Communal Schools teachers from the date of assumption of charge.
- 2. They shall devote their whole time to their duties as Communal School teachers.
- 3. They shall carry out such administrative and teaching functions in relation to their duties.
- 4. They shall submit theirselves to the lawful orders of the Govt: Officers as well as V.E.C.
- They Shall motivate the parents to send their children to school.
- They shall keep in contact with the V,E,C & inform them of schools progress, issues & problems.
- 7. These posting will not be transferable, however, local teachers preferably trained can be adjusted against regular posts on case to case basis & strictly on merit with in the parameters of rules & regulations.
- 8. They should produce their health & age certificate to the Agency Education Officer Office,

(Alhaaj Mohammad Din Khan)
Offg:DIRECTOR OF EDUCATION
FATA (NWFP), PESHAWAR

Endst: No. 2162-74 /H-2/FCS/P&D/

Dated 13 /98/2002

Copy to :-

1. The Additional Secretary Governor's Secretariat Govt: of NWFP Peshawar.

2. The Agency Education Officer, N.W. Agency with the remarks:

To check all their credentials, verify the same from concerned institutions, Boards & Universities and not to hand over them charge if there is any discrepancy. Their orders are approved subject to verification of documents.

ii). Teachers from Communal Schools should not be transferred to permanent posts.

iii). All prevailing services rules with the exception of permanent appointment are equally applicable on these teachers.

The Agency Accounts Officer N.W.Agency.

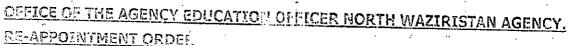
4. The S.A.P (Coordinator) FATA PE&D Department Govt: of NWFP, Peshawar.

The Chairperson Village Education Committee concerned.

Tre Candidates concerned.

ASSIT: DIRECTOR (P&D)

CO



Consequent upon the notification vide no. SO/ (E) SSD/CSTR/99-1 8, Dated 11.05.2012 and recommendation by Departmental selection committee, the following Non-local PTC teachers of communal schools in NW Agency are screeby re-appointed against vacant/ newly created posts noted against their names in BPG- 07 @ Rs. (5800-320-154-0) per month plus usual allowances as admissible under the mission of modeliate effect in the inters of public service.

s.No. 4.3	Name of Community School Teacher.	Name of Community School:	Place of Re-appointment .	Remarks.
i	Wahida Begum D/O Mir Ghafoor Khan	FCS Hassamud Din Mir Ali NV/A	GGPS Wasiullah NWA	Against newly created PTC Post
2.	Zakia D/O Qamar Zaman	FCS Faridullah NWA	-do-	-do-
······ /==	Rashida Begum D/O Rahim Ded Khan	FCS Mir Abbas Khan Mir Ali NWA	GGPS Akhtar Subhan	-do-
	Naseem Akhtar D/O Abour rehman	FCS Bare Khan	GGPS Sahib Rehman Rzk NWA	-do-
	Mossarat Shaheen D/O Gilawar Jan	NWA	GGPS Ghan Subhan Mir Ali NWA	-do-
/	Mehnaz Bibl D/O Muhammad Islam	-do-	-do-	-do-
The state of the s	Sadia Nabowat D/O Nabowat Khan	FCS Hafizullah . Kot NWA	GGPS Bare Khan Razmak	-cio-
 	Saña Nahowat D/O Nabowat Khan	-do-	-(10-	1-40-

- 1. These re-appointments have been made purely on temporary basis subject to terr and conditions framed by the Government from time to time. Moreover, these in appointments can be withdrawn and are liable to termination without any notice, if ar logal, clerical or other kind of mistake arise therein. If they wish to resign from service they will give one month's prior notice or one month's full pay will be forfeited in lie
- 2. If they failed to assume the charge within 15 days, their re-appointment order will t considered as cancelled.
- 3. Their pay will not be drawn till the verification from concerne University/Board/Institution. Moreover, they will be terminated if Certificates/Degrees are found fake/bogus and or tempered with at any stage.
- 4. The appointee will be entitled to the benefits as admissible to a civil servant.
- 5. If the appointees concealed or submit wrong information, disciplinary action will b initiated against them.

6. Charge Report should be submitted in duplicate to all concerned.

(M. Zaveel Wazir) Agency Education Officer, North Waziristan Agency.

/Re-Appointment/PTC/AEO/NWA, Dated $^\prime$ / $^\prime$ /2013 Copies to:

1. The Director of Education (FATA) KPK Peshawar.

2. The Political Agent, North Waziristan Agency Miranshah.

The Agency Accounts Officer Miranshah.
 Head of Institution concerned.

5. AAEOs (Female) Circle Concerned.

6. Accountant Local Office.

7. Candidates Concerned.

(M. Zaveel Wazir) Agency Education Officer, North Waziristan Agency.

نيزى سے بر مدا ہے مرف بده كرنے والى خواتى و . لين بكداكرفيش أيل ورثمى كن شوته عبايا مين وع نظراً دى يى مايا يويده كرف دالى فواتى أ دلیپول) امرکز رااب بری نے فیٹن کا حصر شاہ داخل را ب بس لیے شادی شدہ مکرلے نوایس فائنل اگ فرجمان إركمال مى شول = مبايا يسنظى بي فواتن ك بلی مولی ولیسی کو مدفظر و کفت موسئ او کیات علی وزنت سے انداز کے جہا استعارف کرائے جا دے ایں جومد د طرز کے ڈیزائن پر ہے موتے اوالم ودخا دب ممايا يارنن كاسته ال مرف برد، كر خواغمن مك كدود تما في مروت كرماته برو فال كا عرى سے بالے الاادر الركيث عن الك كى السين تعارف كرالى كش كديجوى الدراتام التراكري فاعجا ك توجد إلى جانب الكرف عن كامياب عوكيا . إ الدين بدوكل إلى ال كوفود برخر ابدنا ما ي كوكدونا یں بہت کا کمایں ہیں گرنااف مرف قرآن پاک ہ على ير حايا جاتا بادرونيا على بهت ك المارثيل بين محزّ

بعدالت جناب آصف رشید صا ایڈیشنل سیشن جج الصواب

مؤان : ي واد مأل وفيرو ـ بنام سلطان نحود وفيرو ـ فم . 1990ء من 121/02/2017 كنور 1 04/01/2018 - عام : 1 سلفالن محود ولدعل انجرساكو ایمی بایان (رساخت می کنند مودن بالای آپ رساخت بالای کیل عمل ادرا مان طریق سے کما: مشکر آور بال ہے جم کے آپ رساخت کو دری اشغار بالم ملل کما جاتا ہے کہ آپ رساخت مودن بیشمار بیا مطال کا جاتا ہے کہ آپ رساخت مودن بیما میری وی مقدم کرے بعورت دیگر آپ سے ملاق يم فرف الول كارروال عمل عن أول جا مكل - آن به فب پیمرد دون وردون ماست در این میاند. میخواجر سنادر میروالت کے جاری کیا تمیار میروالت وسخنا ماکم

بحوالداشتها دنمبر INF(P)6638 دوزيام ٹینڈرکولنے کی تاریخ 2017-12-05 ک شرا نظ د**ضوا لیا ن**رکور واشتهار کےمطابق ہو والزعمران طارق وزي



Shaukat Khanum Memorial Cancer Hos And Research Centre

CAREER OPPORTUNITIES

This is an exciting opportunity to join the country's premier oncology center at a time when we are expanding to establish a network of hospitals across the country. Peshawar has opened its doors to the public in December 2015. We are looking to recruit a team of highly dedicated professionals to help establish clinical **"我的**"。 services at this new unit.

The Shaukal Khanum healthcare system provides an opportunity for professional growth in an environment conductive to research and ecademic excellence. Our doctors not only enjoy excellent clinical work but have published in major international journals as well as presented their research in international meetings.

Shaukat Khanum Memorial Cancer Hospital and Research Centre (SKMCH&RC), Peshawar is pleased to Invite applications for the following positions. Selected candidates will undergo initial training at SKMCH&RC Lahore and, following successful completion of this, will be appointed to positions at SKMCH&RC Peshawar upon commencement of its operations.

Consultant Positions (Peshawar)

- Consultant Medical Oncologist (Peshawar).
- Consultant Gastroenterologist (Peshawar).

- · Consultant Pathologist (Peshawar).
- · Consultant Physician in Infactious Diseases (Peshawar
- Consultant Radiologist (Peshawar). Visiting Consultant Nuclear Medicine, (Peshawar). Consultant Radiologist (Perhawar).

े 🛥 🖖 Medical Positions (Peshawar) 🐍ः

Oncology (Peshawar) & ...

ি ই'ভ িটিছ Other Medical / Clinical, Technical and Management Positions প

HSM Territory Assistant Manager - Hotali Sales • Radiation Therapy Technologist (Peshawar) and Franchise Operations (Peshawar)

For position details and eligibility criteria please visit our website www.shaukatkhanum.org.pk

- Competitive salary, professional growth, continuous education and exce
- Free medical cover only for regular employees, their spouse and children up to 18 years of age.
- > ISO certified environment.

武装:5 Note: We regret only short listed candidates will be notified.

Application forms are available on our website. Pl documents by <u>December 15, 2017</u> to are available on our website. Please send y

Manager, Human Resources

Shaukat Khanum Memorial Cancer Hospital and Research Centre

7A Block R-3, Johar Town, Lahore

Tel: +92 42 3590 5000 Ext. 3037, 3040, 3041 | Fax: +92 42 3594 5203

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A Public Sector Company based in Islamabad invites application of qualified, energetic and self motivated candidates as maintenance staff for a project on contract basis; particulars may be

حدث منار الحدين الوكس الموكس فيدجو الذورس لماتي ع إسائل لوفين الديم برائم ي سعول الدركر وي سمالی وزرتان الدنے سران سا مس کست ۲۵۶ بورٹ سر حدما۔ · 8 6 - 10 B. ه ١٤٥ معد مروام مروى مورم وسالت سے ساملے کمیر علیات عیرماؤی کا ٹولٹی کا جا ہے سنده ری دوج که امار انوا ان فیرهاوی کی ابول سن تو سے سانے کی غیرماوی کا رزیکار سی ساعے رکیٹر ماول ما لو فرمان معلی ایم میرایم کاسول کارار کرد دع مین زمی تعمیدی مرتبر میرایم کاسول کارار کرد دع مین از می تعمیدی میران ایم کار کار کرد در ایم کار کرد در ایم کار کار کرد در ایم کار کرد در کرد



OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY AT MIRAN SHAH Ph.NO.0928313045





NOTIFICATION

- 1. WHEREAS Mst. Mehnaz PST GGPS Gul Zarc Garyum North Waziristan Agency was found willfully absent from duty during monitoring visit of the concerned Assistant Agency Education Officer to the School on dated 01/09/2017.
- 2. AND WHEREAS the accused was proceeded against under Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011, for the charge of "willful absence from duty "as mentioned in the show cause notice served upon her at ner home/School address vide AEO No: 9725-26 dated 09/11/2017.
- 3. AND WHEREAS Mst Mehnaz PST GGPS Gul Zare Garyum North Waziristan Agency did not report to her duty within stipulated period of time and turned her ears deaf.
- 4. ANDWHEREAS Charge sheet notice was served upon Mst Mehnaz PST GGPS Gul Zare Garyum North: Waziristan Agency through print media (Daily Mashriq) on dated 03.12.2017 wherein the accused was directed to submit reply in her defence through personal contact with this office.
- 5. AND WHEREAS the accused failed to put any defense in written and did not appear to be heard in person within fifteen days.
- 6. AND WHEARAS the competent authority, the Agency Education officer North Waziristan Agency, having considered the charges, evidence on record and facts of the case, is of the view that the charge of willful and unauthorized absence against the accused official has been proved.
- 7. NOW THEREFORE, In exercise of the Powers conferred under Rules-4 (b) iii of Khyber Pakhtunkhwa Government Servants "Efficiency and Discipline" Rules 2011, the competent Authority, Agency Education officer North Waziristan Agency, is pleased to impose major penalty "Removal from service "upon Mst: Mehnaz PST GGPS Gul Zare Garyum North Waziristan Agency with retrospective on account of his willful absence from duty.

(HABIBULLAH) Agency Education Officer, North Waziristan Agency

Endst: No.8333-42 Dated: 13/12/2017

Copy forwarded to the:

- 1. Director Education FATA, FATA Secretariat Peshawar
- 2. Political Agent North Waziristan Agency at Miran Shah
- 3. Head Quarter 7-Division Camp Area Miranshah.
- 4. Agency Accounts officer North Waziristan Agency at Miran Shah for stoppage pay of the official.
- 5. PS to Additional Chief Secretary FATA for perusal of the Additional Chief Secretary FATA
- 6. PS to Secretary SSD FATA for perusal of the Secretary SSD FATA
- 7. AAEO concerned for entry in his service book
- 8. Accountant local office for stoppage of his pay forthwith.
- 9. Official concerned

Agency Education Officer North Waziristan Agency

بحضور جناب ڈائر بکٹرصا حب کیجوکیشن فاٹا،خیبر پختونخوایشاور عنوان: اپیل برائے بحالی سروس

جناب عالى!

گزارش بحضورانورہے۔ساکلہ ذیل امور کی جانب آپ کی توجہ مبذول کروانا حامتی ہے۔ يەكەساكلە گورنمنٹ گرلزېرائىمرى سكول گلزارگر يوم ميں اپنى ۋېيۇنى فېرائفې سرانجام دے دې تقى-

1) بركر باكله 11-2017 ك 01-09-2017 ك Show cause AEO No:9725-26 dated notice کی بنیاد برای ڈیوٹی سے غیر حاضر تصور کی گئی۔ چونکہ 2017-09-010 تا 2017-09-04 کوعید الاضحا کی تعطیلات تھی۔ گورنمدنٹ آف خیبر پختونحواہ رولز کے مطابق چھٹیوں کے دن کوئی بھی غیرخاضر پیل ہوسکتا ہے۔ ٢) نه ہی سائلہ کو تحریری طور پر شو کا زنوٹس غیر خاضری کی ملی ہے۔

۳) ید که AEO صاحب نے مورخہ 2017-12-03 کوروز نامہ شرق ہے۔ ہے۔ یہ کہ کر کہ غیر حاضری کا جواب پندرہ دن کے اندرا ندرر اپوزٹ پیش کر نے غیر حاضری کا جواب م Service)ڪِخت ساکلگ**ابڙ ئ**ي Efficiency and Disciplin Rules 2011 عمل میں لائی گئی ہے۔ سرکاری اعلامیہ اروز نامہ شرق احبار کی فوٹو کا پی منسلک ہے اس کے کہ ساکلہ سکول سے غیر حاضری کا ارتکاب نہیں کیا۔ ہے۔ حاضری رجشر ا

درجه بالاحقائق کی روشنی میں سائلہ کی Removel from service کو Withdraw کا حکم صاور فرمائیں۔اور سائلہ کی سروس بحالی کا حکم کر کے مشکور فرما ئیں۔

بها الله وعا كور بي كا-عورفد: <u>على المالك</u>

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CNCI: 14203-9892912-2

F.No.2/4/2016-Public. GOVERNMENT OF PAKISTAN MINISTRY OF INTERIOR

Islamabad the 23 August, 2017.

PRESS RELEASE

it is notified for general information that 1st to 4th September, 2017 (Friday, Saturday, Sunday and Monday) shall be public holidays on the occasion of Religious Festival of Eid-ul-Azha.

The above Press Release may kindly be published in all major English and Urdu Dailies both at National and Regional levels and also be given vide publicity through electronic media.

> (Atif Aziz) Deputy Secretary (Law-II)

Tele: 9203851

The Principal Information Officer, Press Information Department, Islamabad.

Copy forwarded to: -

- 1. President's Secretariat (Personal), OSD (Admn), Aiwan-e-Sadr, Islamabad.
- 2. President's Secretariat (Public), DS (Admn), Alwan-e-Sadr, Islamabad.
- Prime Minister's Office (Internal), OSD (Admn), Islamabad.
- Prime Minister's Office (Public), DS (Admn), Islamabad.
- 5. The Chief Election Commissioner of Pakistan, Islamabad.
- 6. The Auditor General of Pakistan, Islamabad.
- The AGPR, Islamabad.
- 8. The Joint Staff HQrs, Chaklala, Rawalpindi.
- 9. GHQ, Rawaipindi...
- 10. Chairman, National Accountibility Bereau, (NAB), Islamabad.
- 11. All Ministries / Divisions.
- 12. The Registrar, The Supreme Court of Pakistan, Islamabad.
- 13. Secretary, Senate Secretariat, Islamabad.
- 14. Secretary, National Assembly Secretariat, Islamabad.
- 15. Chief Secretaries, Government of the Punjab / Lahore, Sindh / Karachi, Khyber Pakhtoonkhwa / Peshawar, Balochistan / Quetta, Northern Areas / Gilgit-Baltistan and AJK / Muzaffarabad.
- 16. The Director General, ISI, Islamabad.
- 17. The Director General, IB, Islamabad.
- 18 The Chief Commissioner, ICT (Admn), Islamabad.
- 19. The Manager, State Bank of Pakistan, Islamabad.
- 20 Secretary, Wafaqi Mohtasib's Secretariat, Islamabad.
- 21 Secretary, Wafaqi Tax Ombudsman's Secretariat, Islamabad.
- 22. The Chairman CDA, Islamabad.
- 23 Director (Media), Minister for Interior, Islamabad with the request to ensure its publication in all dailies.
- 24. Staff Officer to Minister for Interior, Islamabad.
- 25. PS to the Secretary, Ministry of Interior, Islamabad.
- 26. P.S. to the Additional Secretary-I, II'a III, M/o Interior, Islamabad.
- 27. The System Administrator (IT), MOI with request to upload an official

(Atif Aziz) Deputy Secretary (Law-II)

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الحدالت جناب ١٩٨٨ - ١٥٠٥ المارية الما

الماعث تحريراً نكه

Juster - 2 Jarie 2 2

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA PESHAWAR

Mst.	Mehnaz	Ex-	Senio	r Primary	/ School	teacher	Pe	titioner

VERSUS

- 1. Director Education FATA, KPK, Peshawar.
- 2. Agency Education Officer, North Waziristan Agency at Miran Shah.
 ------Respondents

INDEX

S.NO	DISCRIPTION OF DOCUMENTS	ANNEXTURE	PAGES
1	Comments		1-2
2	Affidavit		3
3	Authority letter	_	4
4	Show cause notice	Annexure -A	5
5	Inactivation of salary	Annexure-B	6
6	Newspaper cutting	Annexure-C	7
7	Termination order	Annexure-D	8

ASSISTANT DISTRICT EDUCATION OFFICER
NORTH WAZIRISTAN

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 525/2018							
Mst. Mehnaz Ex-Senior Primary School teacher	Petitione						
VERSUS							
1. Director Education FATA, KPK, Peshawar.							

2. Agency Education Officer, North Waziristan Agency at Miran Shah.

Para wise comments on behalf of Respondent No.1 & 2

Respectfully Sheweth:

Preliminary Objections:

- 1. The appellant has no cause of action, locus standi, to file this instant appeal.
- 2. That the appellant has not come to this honorable Tribunal with clean hands.
- 3. That the appellant has concealed material facts from this Honorable Tribunal.
- 4. The appeal is not maintainable in this form.
- 5. That the appellant has been stopped by his own conduct to file the appeal.
- 6. That the appeal is badly time barred.

On Facts:

- 1. Correct. No comments.
- 2. The duty of the appellant was not that much satisfactory.
- 3. Though the appellant was posted at GGPS Taj Ali kot Bichi kaskai and the supervisor of the circle concerned was not satisfied with the performance of her duty at the said school and the AAEO (Female) complained to the Agency Education Officer (now designated as DEO) time and again. At last the AEO, the Respondent No.2 issued Show cause notice to the appellant on 09/11/2017 to explain her position about her absence from her school. (copy of the show cause notice is attached as Annexure-A) But surprisingly, the appellant failed to report to the Education Office. In the same way the computerized salary of the appellant was inactivated for the month of Dec: 2017. (Copy of the inactivation is attached as annexure-B). Similarly, on the local FM Radio at Miran shah, the notice of all such habitual absent teachers was brought on air, but again the appellant failed to join her school. Beside these, the names of such teachers, including the appellant was shared on social media such as face book which was shared by the than political Agent as well. Despite that the appellant neither reported to the DEO office nor joined her duty at her school. Then after a stipulated period of time, the DEO published a warning in the Newspaper, the Daily Mashriq on 03/12/2017 regarding the appellant and some other teachers about their absence from duties. (copy of the newspaper cutting is attached as Annexure-C)
- 4. The appellant has neither attended her school nor submitted any report to the Education office for any kind of her complaints or what's so ever.
- 5. At last, the respondent department terminated the appellant from service on 13/12/2017, which is lawful and legal. (copy of the appellant's termination is attached as Annexure-D)
- 6. Correct that the appellant has submitted her departmental appeal before the respondent No.1. In this regard proper interviews have also been arranged but the case has not yet been decided by the respondent No. 1. Keeping in view the above mentioned points, the appeal may kindly be dismissed on the following grounds.

Grounds:

- A. The termination order issued by the respondent No.2 is just lawful and legal. Correct that the mentioned date of 01/09/2017 in the termination order was a holiday but that date has been mentioned just as a proof that since long till 01/09/2017, the appellant failed to join her duties at her school.
- B. Correct that the 1st to 4th of September 2017 were holidays but the appellant had been remained absent from her duties since long till the 1st of September 2017. And till the 1st of September 2017 different schools were checked by the AAEO female on different dates.
- C. All the schools were checked on different dates and it had been proved that all those terminated teachers including the appellant remained absent from duties for a long time and that habitual absenteeism remained constant till the 1st of September, 2017.
- D. If the appellant could have performed her duties at her school, she could have been informed of the reservations of the Education Office.
- E. The penalty of removal from service is just, lawful and legal
- F. The respondents seek permission of this august court to advance other points at the time of arguments.

Respondent No.1

Director of Education
Newly Merged Trible Districts

Respondent No. 2

District Education Officer North Waziristan Trible District

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 525/2018

Mst. Mehnaz Ex-Senior Primary School teacher-----Petitioner

VERSUS

- 1. Director Education FATA, KPK, Peshawar.
- 2. Agency Education Officer, North Waziristan Agency at Miran Shah.

-Respondents

AFFIDAVIT

I Naseem Mahmood Assistant District Education Officer North Waziristan Agency on behalf of the Respondent No. 1 & 2, do hereby solemnly affirm and declare that the report of Respondent No.1 & 2 in R/O of Appeal. No. 525/2018 and others is true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Naseem Mahrwood
Assistant District Education Officer
North Waziristan

AUTHORITY LETTER

This office has the honor to state that Mr. Naseem Mahmood has been serving in the district Edu: Office as an ADEO. The undersigned has been given the authority to attend any kind of court case. So he may be considered as representative of the district Edu: officer, N.W.T.D

DISTRICT EDUCATION OFFICER

NORTH WAZIRISTAN AGENCY TRIBLE DISTRICT