




Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1080/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/06/2022	<p>The appeal of Mst. Parveen Rasool resubmitted today by Mr. Hassan Nasir Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	4/7/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>6-7-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	7 th July, 2022	<p>None for the appellant present.</p> <p>Counsel are on strike. Notices be issued to the appellant and her counsel. To come up for preliminary hearing on 08.09.2022 before S.B.</p> <p> (Kalim Arshad Khan) Chairman</p>

Appellant info -
By Telephone -
11-8-2022

The appeal of Mst. Parveen Rasool w/o Jamsheed Ullah Khan r/o Madrassa Khalid Bin Waleed Road Post Office Islamabad received today i.e. on 28.06.2022 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 are unattested.
- 2- Page nos. 18, 20, 21 and 22 are illegible which may be replaced by legible/better one.
- 3- Check list is blank which may be filled up.

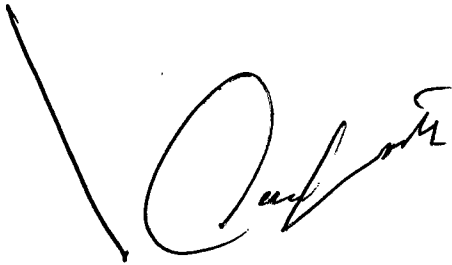
No. 2120 /S.T,

Dt. 29/6 /2022


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hassan Nasir Adv.
High Court Peshawar.

Note
Re submitted After removing
The above mention deficiency


Hassan Nasir
Advocate High Court
Peshawar

UNLAWFULLY, BASED UPON MALAFIDE AND UNCONSTITUTIONALLY.

Prayer in Appeal:

On acceptance of instant appeal, the orders dated 25/02/2022 and order dated 20/06/2022 of the departmental appeal may kindly be set aside be declared unlawful, illegal, unconstitutional and consequently the appellant may very kindly be re-instated on his post with all back benefits whatsoever.

Respectfully Sheweth:-

1. *That the appellant was appointed as AT (female) vide order of the respondent no 1 dated 26/11/2011 Later on was transferred in the year 2018 to the Govt Girls Middle School Ghari Saydian (Khanpur) District Haripur.
(Copy of the appointment order is attached as annexure A)*

2. *That here it is pertinent to mention here that in the entire service record there is no compliant what so ever and appellant fulfilled her duty with full zeal, heartedly and honestly in this regard certificate was also issued to the appellant by the Head Mistress of Govt Girls Middle School Ghari Saydian (Khanpur) on 30/06/2019.
(Copy of the certificate dated 30/06/2019 is attached as annexure B)*

3. That again one thing which is very important to mention here that husband of the appellant is working in Islamabad and also has the permanent resident of the Islamabad.

(Copy of the CNIC is attached as annexure C)

4. That due to the above mention facts the appellant applied in model deeni madrassa for girls on deputation basis affiliated with Pakistan madrassa education board islamabad through Govt of Pakistan ministry of religious affairs and interfaith harmony Islamabad on the ground of wedlock policy and due to no objection from the parent department i.e. respondent no 3 dated 26/04/2019 the appellant services was placed at the disposal of the deeni madrassah for girls Islamabad on deputation basis for a period of three years vide order dated 29/04/2019 and in this regard relieving chit was also issued by the respondent no 3 on 07/02/2019.

(Copies of the orders dated 23/04/2019, 26/04/2019, 29/04/2019, 07/02/2019 and 14/06/2019 are attached as annexure D, E, F, G and H respectively)

5. That the Govt of Pakistan Minister of Federal Education & Professional Training Pakistan Madrasah Education Board islamabad issued a notifation dated 23/07/2021 Through Assistant Secretary,PEMB to the respondent no 4 wherein the service of the appellant was repatriated to her parent

department. (Copy of the notification dated 23/07/2021 is attached as annexure I)

6. That the appellant after the repatriation order dated 23/07/2021 submit her arrival report with the respondent no 3 on 16/09/2021 with a request to adjust me in my pervious school i-e Govt Girls Middle School Gari Saydain Khan pur district harripur from where she was transferred on deputation to Islamabad.

(Copy of the arrival report dated 16/09/2021 is attached as annexure J)

7. That after some days the appellant was known from some resources that the appellant was posted in Govt Girls middle School sware Maira which was far away from harripur there for the appellant request time and again through application and through telephone to the respondents to adjust me in my old school or some other school in harripur which is near to me as I resides in Islamabad. (Copy of the Application is attached)

8. That during this time the appellant was on the wait for the good news in the shape of posting again in harripur near to Islamabad but was astonished to know that the respondent imposed major penalty i-e removal from service of the appellant without any show cause, notice, personal hearing

of the appellant and the allegations of the respondents are that the appellant was absent from her duty but in reality the appellant was on wait to again be posted in harripur further more no notice or show cause was served upon or reached to the appellant nor any newspaper come before her because of the fact that she resides in Islamabad.

(Copy of the notification dated 25/02/2022 is attached as annexure K)

9. *That the appellant filed departmental appeal dated 10/03/2022 against the said illegal unlawful notification dated 25/02/2022 where in the appellant explain her stance thoroughly but unfortunately the appeal was rejected by the respondent no 4 vide its order dated 20/06/2022.*

(Copies of the appeal dated 10/03/2022 and order dated 20/06/2022 are attached as annexure L & M respectively)

10. *That being aggrieved from the illegal, unlawful order dated 20/06/2022 of the respondent no 4 and having no other alternate remedy but to approach this Hon,able Tribunal on the following grounds.*

Grounds:-

- A. *That the impugned order is illegal, unlawful and not based upon the real facts, hence not tenable in the eyes of law.*

- B. That the impugned order of respondent No 4 is illegal as no explanation, show cause or final show cause, opportunity of personal hearing has been given to the appellant so by violating the law, rules and regulation, the impugned orders are not maintainable, liable to be set aside.
- C. That the appellant has a very long spotless service of 8,9 years, but the respondents have malafidely passed the impugned orders without considering his long service in the said department so the impugned orders are very harsh and not based upon the real facts so on this ground too the impugned order are liable to be struck down.
- D. That the actions and orders taken against the appellant or not after proper explanation, show cause and even no opportunity of personal hearing has been provided to the appellant so the orders are illegal, irregular, unlawful and has no support of the law so the same are liable to be brush aside.
- E. That the appellant is a married women having little babies resides in Islamabad with her husband and was un aware about all the proceeding adopted by the respondents further more there was no compliant what so ever to anyone including to the respondents in her long 8,9 years service.

- F. *That the appellant had not been treated in accordance with law, hence her right has been secured, guaranteed by the law and constitution, but the same has been badly violated by the respondents.*
- G. *That no proper procedure has been adopted before the dismissal of the appellant of her service and the appellant has never served with any charge sheet or show cause notice non has been any inquiry been conducted the impugned orders are thus passed in violation of the principles of natural justice.*
- H. *That any other grounds will be taken at the time of arguments with kind permission of this Honorable Tribunal.*

It is, therefore, most humbly prayed that on acceptance of this Service Appeal, the illegal unlawful order dated 25/03/2022 and the order dated 20/06/2022 may kindly be set aside and consequently the appellant may kindly be re-instated on his post with all back benefits whatsoever.

8

Any other remedy which deems fit by this Honourable Tribunal may also be granted in favour of appellant.

Dated:-

Through:-

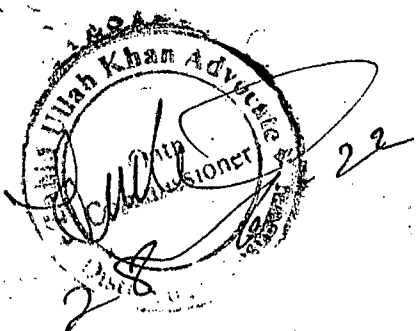
Parveen Rasool

Appellant

Hassan Nasir
Advocate High Court
Peshawar.

AFFIDAVIT

I, Parveen Rasool W/o Jamsheed Ullah Khan R/o Street No 5 Madrassah Khalid Bin Waleed Road, Post office Islamabad, House No 14, Badhana Horad D-16, Tehsil And District Islamabad (The appellant) do hereby solemnly affirm and declare on oath that the contents of this accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



Parveen Rasool

DEPONENT

CNIC No:-15306-7649218-6

Cell No:-0335-5222212

0331 = 5915781



Self

10
OFFICE OF THE
EXECUTIVE DISTRICT OFFICER
(E&SE) DIR LOWER.

OFFICE ORDER.

Consequent upon the recommendation / approval of the District Selection Committee / District Promotion Committee (Elementary & Secondary Education) Dir Lower in its meeting held on 24&25/11/2011 the following ATs (Female) are hereby appointed in BPS-15 (Rs.8500-700-29500) plus usual allowances as admissible to them under the rules, against the vacant posts at the schools noted against their names with immediate effect in the interest of public service subject to the following terms and conditions.

75% by Initial Recruitment

S#	NAME	FATHER'S NAME	RESIDENCE	MERIT	SCHOOL WHERE APPOINTED
1	RABIA BIBI	WALI UL CHAFOOR	CHARGORAI	81.32	GGHSS KUMBAR
2	SHAIKZIA BEGUM	JEHAN BALSALAH	MANDESH	53.34	GGMS SEER TOORMANG
3	ZEBA ALI	SAID ALI SHAH	SADDO	47.90	GGHS HAJI ABAD
4	PARVEEN RASOOL	MOHD RASOOL KHAN	PENDI KASS	47.88	GGHS MUNJAI
5	FOUZIA ANJUM	MOHD ZAFAR	BEYARI	47.40	GGMS BEYARAI
6	BIBI SCMA	MOHD IMAJ	NARAI SHAH	45.70	GGMS DARO MAIDAN
7	MARYAM BEGUM	MADARA KHAN	DIHANDONA	44.35	GGHS HAYASERAI
8	SAUDIA BIBI	ANWAR KHAN	KHADAGZAI	42.68	GGMS AUTO MAIDAN
9	JEHAN WALA	OHUL AMIR KHAN	OUCH	42.20	GGHS SHONTALA
10	MIFAT BIBI	HADUL AMIR KHAN	KHALL	41.95	GGHS KOTO
11	NAVISA BIBI	MUHAMMAD KHAN	MEHA	36.44	GGMS LAJBOOK
12	MASFENA BEGUM	BYED AHMED KHAN	SHAMSHI KHAN	33.14	GGMS SADBARKALAY
13	RAHMA	MATIL KHAN	MIAN KALAY	29.85	GGHSS MAYAR JANDOL
14	FATIMA	MOHD AHMED	MAYAR	28.59	GGMS MASKINI
15	RAHAM KAUSAR	MOHD IQBAL	KHADAGZAI	27.97	GGMS KAMBAT
16	KALSOOM BIBI	RUSTAM KHAN	OUCH	26.43	GGMS SHAGAI MAIDAN
17	KHATIMA BIBI	ZAHIR SHAH	KOZ KALAY KHAL	22.94	GGHS ZAINDARA
18	RAHIMA BIBI	KHAN	SAMARBAGH	21.13	GGHS BADIN

25% BY PROMOTION

S#	NAME	FATHER'S NAME	PRESENT SCHOOL	SCHOOL WHERE POSTED
1	NIZAKAT BEGUM	GUL BAZ KHAN	GGMS MANDESH	GGMS NARAI TANGI
2	NAZIA ZAMAN	AMIR ZAMAN	GGHS ASBNR	GGMS ANGO
3	SAIMA BIBI	GUL BAZ KHAN	GGMS SOGHALAI	GGHS HAJI ABAD

سارکے شیخ
لکھنؤ کے استاد
سر

10A
TERMS AND CONDITIONS:

1. They will be governed by such rules and regulations as may be prescribed by the government from time to time for the category of government servants to which they belong.
2. Their appointments are purely on temporary basis liable to termination at any time without notice. In case leaving the service, they shall be required to submit one month prior notice OR deposit one month's pay to government treasury in lieu thereof.
3. They are directed to produce their Health & Age certificate from the Civil Surgeon Dir lower at Timergara.
4. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
5. NO TA/DA will be paid to them on joining the post.
6. Their age may not exceed 35 years or below 18 years.
7. Charge reports should be submitted to all concerned.
8. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
9. This office will issue clearance certificate regarding verification of documents and release of pay, till then their pay may not be released.
10. This order is issued, errors and omissions accepted, as a notice only.
11. 75 % candidates have been initially recruited from amongst those candidates who have qualified ETEA test for the purpose purely on merit while 25% have been promoted from amongst the TTs having the prescribed qualification / experience working in various schools of the District.
12. They shall be on probation for a period of two years which is extendible to one year more.
13. They will get all the benefits of civil servants except GP Fund, pension & gratuity vide letter No.6.(E&AD)-13/2006 dated 10-3-2005 and Act 2003 NWFP 23-7-2005.

(MAHMOOD ASLAM WAZIR)
DISTRICT CO-ORDINATION OFFICER
DISTRICT DIR LOWER

Endst. No. 20352-20396 /Dated Timergara the 26 /11 /2011

Copy of the above is forwarded to:

1. The PS to Secretary Elementary & Secondary Education Department Khyber Pukhtunkhwa, Peshawar.
2. The Director Elementary & Secondary Education Khyber Pukhtunkhwa, Peshawar.
3. The District Coordination Officer, Dir Lower.
4. The District Account Officer, Dir Lower.
- 5-24 All the Principals / Head Mistresses Concerned
- 25-45 The Candidates concerned.


EXECUTIVE DISTRICT OFFICER
(E&SE) DISTRICT DIR LOWER.

30-05-2019
Ghani Syedien (Khanjari)
Govt Girls Middle School
Headmistress

Ms. Ghani Syedien
Govt Girls Middle School
Khanjari

Headmistress

Certified that Mrs. Farveen Rasool (M.A.)
B/S. Mohammad Rasool has been working as
A.T. since 1.03.2018 to 31.12.2019 at G.M.S.
Ghani Syedien Govt Girls Middle School with full
dedication and honesty. She is very able and
and hard working and I would very much
clearance certificate is being issued to her
effect. In fact, my own best wishes and success
in her future career in life.

Clearance Certificate

II

آئینہ کارڈ کے لیے پوزیشننگ ڈیوائس

Registrar General of Pakistan
Lahore, Pakistan

500061379003
155-77-387248

11101-4356712-9

PAKISTAN
ISLAMIC REPUBLIC OF PAKISTAN

Name: Jamshid Ullah Khan


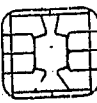
National Identity Card

Date of Issue: 13.03.1977
Date of Birth: 13.03.1977
Date of Expiry: 29.12.2017

11101-4356712-9

M: Pakistan
Gen: Pakistan

Holder's Signature



13

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

No. _____ /P.F/Parveen Rasool / Deputation Haripur

Dated Peshawar the 03/4 /2019

To

The District Education Officer (Female)
Haripur

Subject:

**PLACEMENT OF SERVICE OF REQUISITION OF SERVICES OF MRS
PRAVEEN RASOOL ARABIC TEACHER BPS-15 ELEMENTARY AND
SECONDARY EDUCATION GOVERNMENT OF KPK AT THE
DISPOSAL OF PAKISTAN MADRASSAH EDUCATION BOARD (PMEB)
ISLAMABAD**

I am directed to refer to the subject cited above and to enclose herewith a copy of letter received from Assistant Secretary (PMEB) Govt of Pakistan Ministry of Religious Affairs & Interfaith Harmony vide No. F.2(4) /D-II/2014/ PMEB Islamabad 05-04-2019 in respect of Mst: Mrs. Parveen Rasool AT GGMS Garhi Saydan Khanpur District Haripur which is self-explanatory is submitted for appropriate necessary action as per rule/policy.

Encls: As Above.

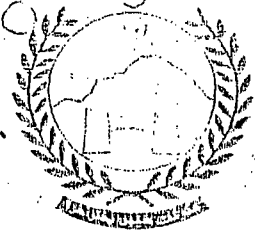
Endst No. 8536 /

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Copy of the above is forwarded to the:

1. Assistant Secretary (PMEB) Govt of Pakistan Ministry of Religious Affairs & Interfaith Harmony Islamabad.
2. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa



14

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

(Office Phone No. 0995-613244 Fax No. 0995-615140)

No. _____ Date _____ 2019

To

The Director,
Elementary & Secondary Education Khyber Pakhtunkhwa,
Peshawar.

Subject: -

PLACEMENT OF SERVICE OF REQUISITION OF SERVICES OF
MRS. PARVEEN RASOOL ARABIC TEACHER BPS-15 ELEMENTARY
AND SECONDARY EDUCATION GOVERNMENT OF KPK AT THE
DESPOSAL OF PAKISTAN MADRASSAH EDUCATION BOARD
(PMEB) ISLAMABAD.

Memo.

With reference to your Office letter No. 3535/P.F/Parveen Rasool/Deputation
Haripur dated Peshawar the 23-04-2019.

This Office has No Objection on Deputation of MS. Parveen Rasool AT BPS-15
GGMS Ghari Syedan Haripur to Model Deeni Madrassah for girls Islamabad.

The report is submitted for further necessary action please.

District Education Officer (F)
Haripur

Endst: No. 6961-63

dated Haripur the 26 / 04 / 2019

Copy of the above is forwarded to the:-

1. Assistant Secretary (PMEB) Govt: of Pakistan Ministry of Religious Affairs & Interfaith Harmony Islamabad.
2. Office file record.

District Education Officer (F)
Haripur

15

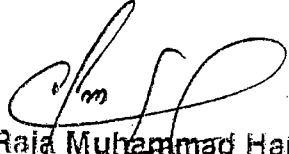
GOVERNMENT OF PAKISTAN
PAKISTAN MADRASAH EDUCATION BOARD
HAJJ COMPLEX, SECTOR I-14, ISLAMABAD

No.9 (145)/2019-PMEB

Islamabad, the 29th April, 2019

OFFICE ORDER

In Pursuance of District Education Officer (Female) Haripur, KPK's letter No. 6961-63 dated 26.04.2019, the services of Ms. Parveen Rasool, AT (BPS-15) GGMS Ghari Syedan Haripur are hereby placed at the disposal of Model Deeni Madrassah for Girls, Islamabad against the vacant post with immediate effect on deputation basis for a period of three (03) years extendable for a further period of two years on standard terms and conditions.


(Dr. Raja Muhammad Hani
Secretary Pakistan Madrasah
Education Board (PMEB))

Distribution:

- i) The Principal, Model Deeni Madrassah for Girls, Islamabad.
- ii) Assistant Accounts Officer, MDMI, Islamabad
- iii) District Education Officer (Female) Haripur, KPK with the request to relieve the official and to provide the necessary papers LPC and service book etc.
- iv) ✓ Official Concerned with the direction to report for duty to the Principal Model Dini Madrassah for Girls, Islamabad after relieving from the parent department.



16
Office of the District Education Officer
Female

Haripur

Ph: 0995-613244

No. 9415-18 / verification file Dated: 07 / 02 / 2019

RELIEVING CHIT.

Referenced to letter No. SO(PE)5-2/IPT/Haripur/Mst. Parveen Rasool AT/2019 dated 14-06-2019 issued by Secretary, Elementary & Secondary Education Department, Peshawar (Khyber Pakhtunkhwa).

You are hereby placed at the disposal of Ministry of Religious Affairs & Interfaith Harmony, Government of Pakistan Islamabad, on deputation basis for initial period of three (3) years on usual terms & conditions. Therefore, you are hereby relieved off your duties on 30-06-2019 (A/N) and directed to report Principal, Model Deeni Madrassah for Girls Islamabad at your new station.

Jammat
District Education Officer (F)
Haripur

No. _____ /

Date: ____ / ____ / 2019

Copy to:

1. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Senior District Account Officer Haripur.
3. The Principal Model Deeni Madrassah for Girls Islamabad.
4. Office copy.

Jammat
District Education Officer (F)
Haripur



17

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Dated Peshawar the 14.06.2019

ORDER

No. SO (PE)5-2/IPT/Haripur/Mst. Parveen Rasool AT/2019:- In pursuance of NOC conveyed by Establishment & Administration Department, Government of Khyber Pakhtunkhwa letter No. SOR-I(E&AD/2-7/2018(B), dated 31.05.2019, the services of Mst. Parveen Rasool, Arabic Teacher (BS-15), GGMS Garhi Saydan Khanpur, District Haripur, Khyber Pakhtunkhwa are hereby placed at the disposal of Ministry of Religious Affairs & Interfaith Harmony, Government of Pakistan, Islamabad on deputation basis for initial period of three (03) years on usual terms & conditions.

2. The borrowing department/deputationist will deposit Pension Contribution, Leave salary, GP Fund, Group Insurance etc. with Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar under the relevant head and will regularly deposit challans to the Director Elementary & Secondary Education Khyber Pakhtunkhwa as per deputation policy of this Provincial Govt.

SECRETARY

Endst. No. & Date as above.

Copy forwarded to the:-

1. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment & Admn. Department, Peshawar, w/r to his letter quoted above.
2. Director, Elementary & Secondary Education Khyber Pakhtunkhwa w/r to his letter No. 4928/P.F/Parveen Rasool/Deputation Haripur dated 17.05.2019.
3. Assistant Secretary (PMEB), Ministry of Religious Affairs & Interfaith Hormony, Government of Pakistan, Islamabad w/r to his letter No. 2(4)/D-II/2014/PMEB dated 05.04.2019.
4. District Education Officer (Female), Haripur.
5. District Accounts Officer, Haripur.
6. Mst. Parveen Rasool, Arabic Teacher (BS-15), GGMS Garhi Saydan Khanpur, District Haripur.
7. PS to Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
8. Master File.

SECTION OFFICER (PRIMARY)

18

E.No, 9(145)2019/PMEB
Government of Pakistan
Ministry of Federal Education & Professional Training
Pakistan Madrasah Education Board
I-14/4, Hajj Complex, Islamabad

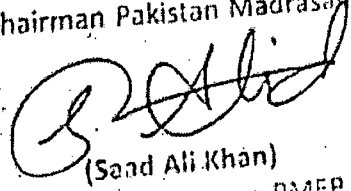
Islamabad the 23rd July, 2021

the Director,
Elementary & Secondary Education,
Government of Khyber Pakhtunkhwa,
Peshawar.

NOTIFICATION

Mrs. Parveen Rasool, Arabic Teacher (Bs-15), GGMS GHA, Syedan Haripur under Federal Directorate of Education (FDE) on deputation basis for period of three years vide letter No.9(145)2019-PMEB on dated 29th April, 2019 has been repatriated to her parent department with immediate effect.

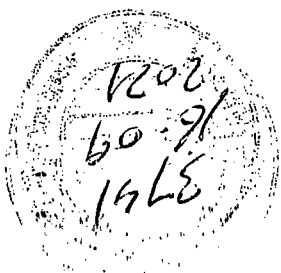
2. This issues with approval of the competent authority i.e. Chairman Pakistan Madrasah Education Board, Islamabad.


(Saad Ali Khan)
Assistant Secretary, PMEB

✓ Mrs. Parveen Rasool,
Model Dini Madrasah (For Girls),
Islamabad.

Copy for information:

1. PS to Chairman, PMEB.
2. Secretary, PMEB.
3. District Education Officer (Female) Haripur, KPK.
4. Assistant Accounts Officer, PMEB/MDM-I
5. File concerned.



P No. - 03339516/143

Parveen Rasool
Aarabz Teacher
BPS +15
GGMS Khan Sardan
Khanpur, Hanpur,
16-9-2021

Thanks

It is requested to kindly adjust me at my previous school i.e GGMS Khan Sardan Khanpur, Hanpur please

It is stated with due respect that reference to my re-patriation orders from Mudd Beni Madrasah Islamabad to my Parent department (Dco (F) Hanpur) I hereby arrive at station today on Sept 16, 2021.

Dear Madam:

Subject: Arrival report

To The Dco (F)
Hanpur

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Page No - 12



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR**

(Office Phone No. 0995-920154, 920155)

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NOTIFICATION

1. **Whereas, Mst: Parveen Rasool AT, GGMS Swar Maira, District Haripur was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules-2011.**
2. **And Whereas, On returned from Deputation, she adjusted against the vacant post of AT at GGMS Swar Maira, vide this office Endst No. 6081 dated 20-09-2021,**
3. **And Whereas, the Headmistress, GGMS Swar Maira submitted the report with the remarks that she did not compliance the office order and not took over the charge.**
4. **And whereas, this office served an absent notice to her home address vide this office No. 7629 dated 26-01-2021.**
5. **And whereas, in response to absent notice, she did not resume her duty within stipulated time.**
6. **And Whereas, after that a final show cause / absent notice sent to Director Information Abbottabad for publication in news paper vide this office No. 8450 dated 16/11/2021.**
7. **And Whereas, the same absent notice was in newspaper dated 25/11/2021.**
8. **And Whereas, on expiry of the stipulated period given in the final absent notice, she did not resume her duty till date.**
9. **Now, Therefore, in exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, rule 4 (b (ii)), the Competent authority is pleased to impose the Major Penalty Of Removal From Service, upon Mst: Parveen Rasool AT, GGMS Swar Maira, District Haripur with immediate effect.**

(Signature)
 District Education Officer (Female,
 Haripur

Endst: No. 1391-63 /DEO (F)/ Haripur

Dated Haripur the 25 /02/2022.

Copy forwarded for information and necessary action to the:

1. Director E & S Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Haripur.
3. Senior District Accounts Officer Haripur.
4. District Monitoring Officer E & SE Haripur.
5. Deputy, DEO (F), Haripur.
6. The Headmistress, GGMS Swar Maira Haripur.
7. Mst: Parveen Rasool At, Ggms Swar Maira, District Haripur.
8. Master File.

(Signature)

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~~Appeal for DEO Haripur~~

The Director Elementary & Secondary Education,
Peshawar,
Khyber Pukhtoonkhwah.

Subject: Appeal against "Removal from Service"

Dear Sir,

It is stated with great respect that in order to live with my family I make inter-district transfer from Taimergarah to Haripur and posted in GGMS Gari Saydan shah in 2017. My husband is civil servant and serving in Islamabad. Soon after I started duty on the above school I got a chance of deputation in Model Deeni Madrissa Islamabad under Ministry of Religious Affairs & Interfaith Harmony in June 2019. After 02 years of deputation the said Madrissah was dissolved and I was repatriated back to DEO (F) Haripur in June 2021.

It is also to bring in to your kind notice that I am from Distt Taimergarah and my husband is living in Islamabad. It was informed by some sources that I have been posted at GGMS Sware Mata, far away from Haripur and approximately 5 hours' drive from Islamabad, therefore due to some health problem and small baby I could not join at that school. I sent an application for leave to DEO (F) Haripur but no reply was furnished.

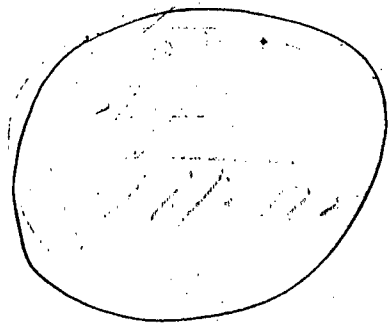
After that I visited few time office of the DEO (F) but could not met because the DEO was transferred and it took 3 or 4 months when the new DEO (F) has joined office. The remaining time spent was because of local body elections in KP where the education department plays main role.

Few days before some female teachers from the same Distt informed me that I have been removed from services due to absentees. It was a shocking news for me and my family.

Sir, during all the period of my absentee I never receive any letter nor any phone call despite the detail about my home address in Islamabad and telephone numbers were recorded at the DEO office.

Foregoing above, I earnestly request your good self to Re-Instate me in service as I am supporting my family, I assure you that I will take care in future.

Thanking You



Parveen Rasool
10-03-2022
Mrs. Parveen Rasool
Arabic Teacher,
DEO (F) Haripur
03339546143

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR



NOTIFICATION

Consequent upon the approval of the competent authority in the light of the Female Haripur report vide letter No. 12142 dated 19.5.2022, the report of the Pawan Board, P-AT AGNIS Gan Sajdan Khanpur District Haripur is hereby reported under vide: 17/1760 of PWD Rules 2011.

DIRECTOR
Elementary & Secondary
Education Khyber Pakhtunkhwa

Endst: No. /P.No. PP/Pawan Rasul AT/Haripur Dated Peshawar the 21/6/2022

1619-12

Copy forwarded for information to the:-

1. District Education Officer (Female) Haripur with the direction to inform the teacher concerned accordingly.
2. Teacher concerned.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.

Assistant Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa

[Signature]

23/06/2022

The District Education Officer (DEO),
Haripur, Khyber pukhtoonkhwah.

24.09.2021

Subject: Request for Posting In GGMS Garhi Saydan Shah Khanpur

Dear Madam,

It is stated with great respect that I was on deputation from June 2021 in Model Deeni Madrasah Islamabad for a period of 3 years under wedlock Policy as my husband is doing job in Islamabad. Due to the dissolution of the said institution I have been repatriated before my initial 3 years period to my parent department i-e DEO Haripur.

2. Upon arrival at my parent department and on submission of my joining report, I have requested that I may be posted at GGMS Garhi Saydan Shah where I left my seat before deputation. The reason was that I belong to District Timergarah and I made inter-district transfer to Haripur to live with my husband in Islamabad.

3. Unfortunately I have been posted in Sware maira, approximately 3 hours distance from Haripur and 5 hours distance from Islamabad and when I visited the school and the area, it was observed that an outsider can't live especially female with low age kids.

4. Upon the aforementioned I request your good self to transfer me from GGMS Swar maira to GGMS Garhi Saydan Shah my place of posting before deputation and near to Islamabad so that I could live with my family and work as well.

Philanthropic action requested.

Parveen Rasool

Parveen Rasool
PHD Scholar (Hadith & Its Sciences)
Arabic Teacher (BPS-15)
Haripur.

*Received to
DEO (Haripur)*

24.9.2021

POWER OF ATTORNEY
(WAKALATNAMA)

IN THE Hon'ble Service Tribunal Peshawar
in Ref 1

Parveen Rasool Appellant

VERSUS

E. D. O and others Respondents

I/We Parveen Rasool the

Appellant above named hereby appoint HASSAN NASIR Advocate High

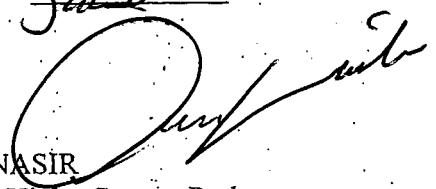
Court in the above mentioned case, to do all the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal/Forum/Authority or any other Court/Tribunal/Forum/ Authority in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits, and applications for compromise or withdrawal, or for submission to Arbitration of the said case, or proceedings or prosecution or defense of the said case at all its stages.
3. To receive payments of, issue receipts for , all money that may be or become due and payable during the course or on the conclusion of the proceedings.
4. To all other acts, deeds and things which may deemed necessary or advisory during the course of the proceedings.

AND HEREBY AGREE:

- a. To ratify whatever the said Advocate may do in the proceedings.
- b. Not to hold the Advocate responsible if the said case be proceeded ex-parte or dismissed in default in consequence of their absence from Court/Tribunal/Forum/Authority when it is called hearing.
- c. That the Advocate shall be entitled to withdraw from the proceedings of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof I/We have signed this Power of Attorney / Wakalatnama hereunder, the contents of which have been read/explain to me/us and fully understood by me/us this 24th day of June at Peshawar



HASSAN NASIR
Advocate High Court, Peshawar
BC-14-4833
Mob: 0314-9214909
Email: Hassan-sub@hotmail.com
Off Add: 610, Pak Medical centre,
Khyber Bazar, Peshawar

Parveen Rasool
Signature of executant/s

Accepted subject to the terms regarding payment of fee