

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Replication No. _____ of 2018

In

Service Appeal No. _____ of 2018

Mst: Mehnaz Afridi D/o Zahir Shah presently Posted
at Govt Girls Higher Secondary School, Samand Khan
Kaley, FR Peshawar.

..... Appellant

VERSUS

Director Education SSD FATA, FATA Secretariat
Warsak Road, Peshawar (Now called as District FR
Peshawar) and others.

..... Respondents

AFFIDAVIT

I, Mst: Mehnaz Afridi D/o Zahir Shah Posted at
Govt Girls High School, Khanzada Kaley, FR Peshawar
do hereby solemnly affirm and declare on oath that the
contents of the accompanied writ petition are true and
correct to the best of my knowledge and belief and
nothing has been concealed from this Hon'ble Court.

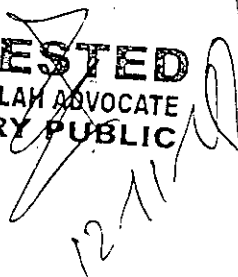


DEPONENT

CNIC # 16101-9314770-8

identified
by Counsel

ATTESTED
IRFAN ULLAH ADVOCATE
NOTARY PUBLIC


12/11/18

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 88-89 /ST

Dated 11 / 01 / 2019

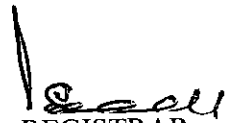
To

1. The Director Education FATA,
Government of Khyber Pakhtunkhwa,
FATA Secretariat Warsak Road Peshawar.
2. Mr. Abdul Rauf Agency Education,
Government of Khyber Pakhtunkhwa,
FR Peshawar.

SUBJECT: - ORDER IN APPEAL NO. 391/2018, MST. MEHNAZ AFRIDI.

I am directed to forward herewith a certified copy of order dated 02.01.2018 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 322 /ST

Dated 22/02/2019

To


Mr. Yousaf Raheem Deputy Secretary, Education Department,
Government of Khyber Pakhtunkhwa,
FATA Secretariat Warsak Road Peshawar.

SUBJECT: - **ORDER IN APPEAL NO. 391/2018, MST. MEHNAZ AFRIDI.**

I am directed to forward herewith a certified copy of order dated 19.02.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

o/c


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 731 /ST. Dated 10-4- /2019


To,

The Additional Chief Secretary,
FATA, FATA Secretariat,
Govt of Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: - ORDER IN APPEAL NO. 391/2018, MEHNAZ AFRIDI VS GOVT.

I am directed to forward herewith a certified copy of Order/Judgment dated
29.03.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above





REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

Form-A

FORM OF ORDERSHEET

Court of _____

Case No. 391/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	<p>19/03/2018</p> <p>20/03/18</p> <p>02.04.2018</p>	<p>The appeal of Mst. Mehnaz Afridi presented today by Mr. Tariq Kakar Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>02/04/18</u>.</p> <p style="text-align: right;"> MEMBER</p> <p>Due to general strike of the bar, the case is adjourned. To come up for preliminary hearing on 10.04.2018 before S.B</p> <p style="text-align: right;"> Member</p>

Appeal No. 391/2018
Mehnaz Afridi vs Govt

10.04.2018

~~Learned counsel for the appellant present. Preliminary arguments heard.~~


The appellant has filed the present appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 08.12.2017 whereby the appellant was transferred from Govt Girls High School Khan Zada Killi FR Peshawar to Govt. Girls Higher Secondary School Samand Khan Killi FR Peshawar. The appellant also filed departmental appeal against the transfer order dated 08.12.2017 which was not responded hence the appellant approached this Tribunal.

Point raised needs consideration. Admitted. for regular hearing subject to all just/ legal objections. The appellant is directed to deposit security and process within (07) days thereafter. notice be issued to the respondents department for written reply/comments on 25.04.2018 before S.B.

Tentative assessment of the record constitutes prima facie case in favour of the appellant. In view of the grounds agitated in the present appeal the operation of the impugned transfer order dated 08.12.2017 is suspended till the next date fixed.

Director Education FATA/Respondent No. 1 is directed to furnish separate comments as to whether Mst. Nazia, Lab Attendant, Mst. Yasmeen Khan, Sweeper, Mr. Nacem Akhtar, Mali, Mr. Alamzeb, Naib Qasid, Mr. Zahida Bibi, Sweeper, Mst. Jamila Begum Caller, Mr. Wakil Khan, Beheshti, and Mr. Muhammad Khashif, Chowkidar are physical performing duties in the Government Girls High School Khan Zada Killi FR Peshawar or otherwise.

IBMS Travel History Reports of Mr. Nacem Akhtar & Mr. Alamzeb are available on file which is reflective of the fact that these officials have not performed official duties being abroad. Director Education FATA/Respondent No. 1 is further directed to intimate this Tribunal regarding any disciplinary action, if any, against them. Copy of this order sheet be sent to all the respondents for compliance.


Member

391/18

25.4.2018

The Tribunal is non-functional due to retirement of the Worthy Chairman. Therefore, the case is adjourned. To up for the same on 15.5.2018 before S.B.



Reader

15.05.2018

Counsel for the appellant and jMr. Kabirullah Khattak, Addl. AG for the respondents present. Counsel for the appellant stated that security and process fee have not been deposited due to misunderstanding and requested for further time. Security and process fee be deposited within 3 days. Thereafter notices be issued to the respondents. To come up for written reply/comments on 30.05.2018. Respondent No. 1 is further directed to intimate this Tribunal regarding any disciplinary action, if any, on the date fixed. The restraint order shall continue till date fixed.

**Appellant Deposited
Security & Process Fee**



Chairman

30.05.2018

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. Notices be also issued to the respondents for submission of written reply/comments. To come up for written reply/comments on 12.06.2018 before S.B. The restraint order shall continue till the date fixed.


(Ahmad Hassan)
Member

12.06.2018

Counsel for the appellant present. Mr. Daud Jan, Superintendent alongwith Mr. Kabirullah Khattak, Additional AG for the respondents also present. Written reply not submitted. Representative of the department requested for further adjournment. Granted. To come up for written reply/comments on 22.06.2018 before S.B. The restraint order shall continue till the date fixed.

MA
(Muhammad Amin Khan Kundi)
Member

22.06.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Written reply by respondents not submitted. Learned Additional AG requested for further adjournment. Last opportunity granted. Representative of the department is also 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. Adjourned. To come up for written reply/comments on 06.07.2018 before S.B. The restraint order shall continue for the date fixed.

MA
(Muhammad Amin Khan Kundi)
Member

06.07.2018

Counsel for the appellant and Mr. Sardar Shoukat Hayat, Addl: AG present. None present on behalf of respondents. Therefore, fresh notices be issued to the respondent department to attend the court positively. Written reply not submitted. Requested for adjournment. Adjourned. Last opportunity is granted. To come up for written reply/comments on 20.07.2018 before S.B. The restraint order shall continue for the date fixed.

MA
Member

20.07.18

Learned counsel for the appellant and learned Additional Advocate General present. Written reply not submitted despite having been provided last chance. In the stated circumstances the salary of the respondent No.4 is hereby attached. To come up for written reply/comments on 03.08.2018 before S.B


Member

Note Below
20.07.2018

In the meanwhile representative Mr. Shah Nawaz Litigation Assistant appeared and P.P given.


Member

03.08.2018

Clerk to counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted and again made a request for some time. Granted.

On perusal of the memo of appeal the respondents under the old nomenclature do not exist anymore and therefore, most probably written reply/comments could not be submitted in time. As such, appellant is directed to amend the memo of appeal to that extent and thereafter fresh notices be also given to the newly impleaded respondents for written reply/comments on 19.09.2018 before S.B.


Chairman

Service Appeal No. 391/2018

19.09.2018

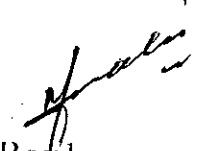
Son of the appellant on behalf of the appellant present. Mr. Kabirullah Khattak, Additional AG for official respondents No. 1 to 4 present. Written reply by official respondents No. 1, 3 & 4 submitted. Notice be issued to respondents No. 2 and 5 for filing of written reply. To come up for written reply/comments on behalf of respondents No. 2 & 5 on 12.11.2018 before S.B.



(Muhammad Amin Khan Kundi)
Member

12.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 23.11.2018. Written reply of respondents No.2 & 5 is still awaiting. Mr. Daud Jan Superintendent representative of respondent No.2 absent.



Reader

23.11.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the official respondents present. Written reply on behalf of official respondents No. 1, 3 & 4 have already been submitted. Representative of official respondent No. 2 is not in attendance therefore, notice be issued to respondent No. 2 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Private respondent No. 5 is also not present therefore, notice be also issued to her for attendance and filing of written reply. Adjourned. To come up for written reply/comments on behalf of respondents No. 2 & 5 on 13.12.2018 before S.B.


Muhammad Amin Khan Kundi
Member

13.12.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG on behalf of official respondents No. 1 to 4 present. None present on behalf of private respondent No. 5 nor written reply submitted therefore, notice be issued to her for attendance and filing of written reply. Written reply on behalf of official respondents No. 1, 3 & 4 have already been submitted. Representative of respondent No. 2 is also not in attendance therefore, notice be issued to respondent No. 2 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on behalf of respondents No. 2 & 5 on 28.12.2018 before S.B.


Muhammad Amin Khan Kundi
Member

28.12.2018

Learned counsel for the appellant present. Comments on behalf of official respondents No.1, 3 and 4 already been received. Adjourn. To come up for rejoinder/arguments on 10.01.2019 before D.B. The remaining respondents may submit their comments on the date fixed.


Member

02.01.2019

Learned counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant stated that the respondent department has not furnished separate comments and intimation as to whether Mst. Nazia Lab Attendant, Mst. Yasmin Khan Sweeper, Mr. Naeem Akhtar Mali, Mr. Alamzeb Naib Qasid, Mst. Zahida Bibi Sweeper, Mst. Jameela Begum Caller, Mr. Wakeel Khan Beheshti and Mr. Muhammad Kashif Chowkidar are physically performing duties in Government Girls High School Khanzada Kalli FR Peshawar or otherwise and that whether the respondent department has taken any disciplinary action against Mr. Naeem Akhtar and Mr. Alamzeb mentioned above as their IBMS travel history reports are available on file. Mr. Abdur Rauf Agency Education Officer is directed to appear in person before this Tribunal on the next date fixed as 24.01.2019 before D.B to render proper assistance and explanation. Copy of this order sheet be sent to respondent No.1 and respondent No.3 for compliance.


Member



Member

24.01.2019

Counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Mr. Abdur Rauf, DEO, Khyber and Mr. Daud Jan, Supdt. for official respondents no. 1 to 4 present. None present on behalf of private respondent no.5, hence placed ex-parte.

Mr. Abdur Rauf, DEO, Khyber appeared in person and provide relevant record as asked for vide order sheet dated 02.01.2019 which is placed on file. Action against the concerned officials has been initiated by the said officer. He was further directed to finalize the matter on urgent basis and provide written report on or before the next date of hearing. Case to come up for further proceedings on 19.02.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

19.02.2019

Learned counsel for the appellant and Mr. Usman Ghani learned District Attorney alongwith Mr. Abdur Rauf ADEO for the respondents present.

Mr. Abdur Rauf ADEO states that action against the delinquent officials has already been initiated and the report in the said respect would be submitted within a month. Adjourned to 22.03.2019 on which date the respondents shall positively come up with the result of proceedings referred to in order dated 02.02.2019

There is an application for initiation of Contempt of court proceedings against Mr. Yousaf Raheem Deputy Secretary Education SSD FATA on account of dis-regarding the order dated 10.04.2018, whereby, impugned transfer order of appellant was suspended. Notice of the application be given to Mr. Yousaf Raheem DS who shall appear in person on next date of hearing.


MEMBER


Chairman

22.03.2019

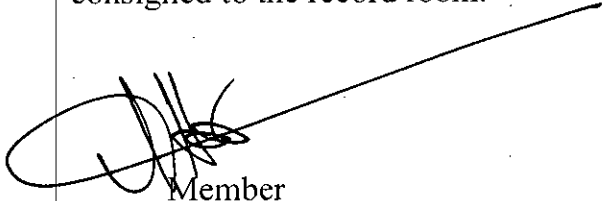

Counsel for the appellant and Mr. Muhammad Jan, DDA
alongwith Abdur Rauf, Addl. DEO for the respondents
present.

The court time is over, therefore, instant matter is
adjourned to 29.03.2019 before the D.B.

Member


Chairman

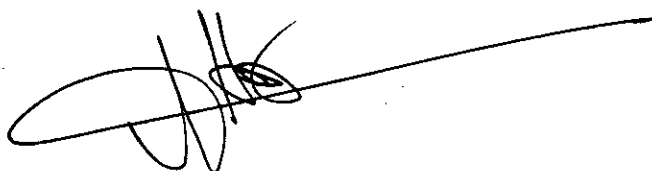
391/2018

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	29.3.2019	<p><u>Present.</u></p> <p>Mr. Tariq Kakar, Advocate ... For appellant</p> <p>Mr. Muhammad Jan, Deputy District Attorney ... For respondents</p> <p>Vide our detailed judgment of today, the appeal in hand is allowed as prayed for in its memorandum.</p> <p>Parties are left to bear their respective costs. File be consigned to the record room.</p> <p> Member</p> <p> Chairman</p> <p><u>ANNOUNCED</u> 29.03.2019</p>


misconduct which were never initiated against her. In the said context, the allegations of complaints against the appellant appears to be eye wash.

6. In view of the facts and circumstances of the case, the appeal in hand is allowed as prayed for in its memorandum.

Parties are left to bear their respective costs. File be consigned to the record room.



(AHMAD HASSAN)
MEMBER



(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
29.03.2019

4. It is a matter of record that the appellant was posted as Headmistress at GGHS Khanzada Killi in December, 2015 and before completion of her tenure as per transfer/posting policy of the Provincial Government was transferred to GGHSS Samand Khan killy on 08.12.2017. The record also shows that the appellant had submitted to respondent No. 1 the report regarding some officials who were in continuous absence from their respective duties in the school. The said report was sent on 22.11.2017. On record there is also available IBMS travel history report of Naeem Akhtar and Alam Zeb which was provided by the Federal Investigation Agency, Khyber Pakhtunkhwa Peshawar. As per the report many travels abroad were undertaken by the said two persons during their posting at the school. The official Naeem Akhtar was a Mali while Alam Zeb was Naib Qasid at the relevant time. The said record was communicated to the appellant, upon her request on 29.11.2017. The appellant forwarded the said record to the concerned authority for taking action in accordance with law.

5. It appears that premature transfer of the appellant, impugned in the appeal in hand, was also motivated by the disciplinary action initiated upon the complaint of appellant which was not at all in consonance with the relevant policy of the Government. The action of respondents also smacks of malafide as the allegations against the appellant, as laid down in the reply to the appeal, required departmental proceedings against her on the count of

3. We have heard learned counsel for the appellant, learned Deputy District Attorney on behalf of the respondents and have also examined the available record. The respondents were required through order dated 19.02.2019 to produce record pertaining to the proceedings taken, if any, against the delinquent officials which was produced today before the Tribunal.

Learned counsel for the appellant contended that the impugned transfer of appellant was not at all in the interest of public service but was due to political pressure. The delinquent officials were strong enough to have proceeded abroad without taking any departmental permission or ex-Pakistan leave and simultaneously their salary was being drawn. Upon initiation of proceedings against them they pressurized the respondents to effectuate the impugned transfer of the appellant. The said transfer was, therefore, an act of malafide on the part of the respondents, it was added.

Learned Deputy District Attorney, on the other hand, vehemently contested the appeal and stated that there were many complaints, including those of class-iv officials of the school against the appellant. Besides, proceedings were duly initiated against the delinquent officials upon receipt of complaint by the appellant. The respondents, therefore, acted in accordance with law and relevant policy.

Khan Killi F.R Peshawar. Her departmental appeal remained un-responded, hence the appeal in hand.

2. According to facts in the memorandum of appeal, the appellant was posted at GGHS Khanzada Killi in the year, 2016 and prior to that she remained posted at different places. After taking charge as Headmistress at GGHS Khanzada Killi F.R Peshawar, she came to know from the record that two class-IV officials were though employed and posted at the school but in fact they were not performing duty in the school and remained absent since a long time. The said employees were issued show cause notices for their continuous absence and directions for re-joining the duty. It was consequently revealed that the officials had gone abroad and were laboring in a foreign country. In the said regard the information was obtained from Immigration Department of FIA. The respondents were, therefore, apprised of the situation who undertook the proceedings against the delinquent officials. It was at this juncture that on the behest of absenting officials political pressure was applied on the respondents who refrained from taking the issue to its logical conclusion. Not only that the appellant was also transferred under the same pressure by respondents from GGHS Khanzada Killi, F.R Peshawar to GGHSS Samand Khan Killi, F.R Peshawar. She preferred a departmental appeal but in vain.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Appeal No. 391/2008

Date of Institution ... 19.03.2018

Date of Decision ... 29.03.2019

Mst. Mehnaz Afridi D/O Zahir Shah presently posted at Government Girls Higher Secondary School, Samand Khan Kaley, F.R Peshawar.

...(Appellant)

VERSUS

Director Education FATA, FATA Secretariat Warsak Road, Peshawar and four others.

... (Respondents)

Present.

Mr. Tariq Kakar,
Advocate.

... For appellant

Mr. Muhammad Jan,
Deputy District Attorney

... For respondents.

MR. HAMID FAROOQ DURRANI,
MR. AHMAD HASSAN,

... CHAIRMAN
... MEMBER

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of her transfer order dated 08.12.2017, whereby, she was transferred from Government Girls High School Khanzada Killi F.R Peshawar to Government Girls Higher Secondary School, Samand



To

**The Registrar
Khyber Pakhtunkhwa
Service Tribunal Peshawar.**

Subject:- ORDER IN APPEAL NO. 3901/2018 Mst: MEHNAZ AFRIDI.

Memo:-

It is stated that view/comments regarding the subject cited above is as under please.

1. Ms. Mehnaz Afridi HM reported vide letter No. 149 dated: 14.11.2017 that the pay may be deducted from Class-IV due to absentissem. (Annexure "A")


The undersigned served show cause against the mentioned staff vide No. 2268-71-A dated: 15.11.2017. Annexure-B"

The undersigned deducted pay 05-days each. (Annexure-"C").

2. Similarly, the undersigned paid surprise visit to the concerned school, detail of the visit attached. Annexure-"D"
 3. The undersigned directed the Headmistress vide letter No. 2342 dated: 27.11.2017 to inform all class-IV to physical appear before the undersigned along with their original CNIC. Annexure-"E"
 4. According to this office letter the class-IV appeared on 29.11.2017 their data attached. Annexure-"F"
 5. As per report of the Headmistress Mr. Nacem Akhtar Mali and Mr. Alam zeb N/Q of the said school were charge sheet by the undersigned vide No. 2449-53 datedL 07.12.2017. Annexure-"G"
- Conveyed their replies against charge sheet as Annexure-H.

6. Subsequently the undersigned submitted a letter along with their replies vide letter No. 2555 dated: 21.12.2017, therein, asking for further necessary action. **Annexure-I.**
7. Local Community report against the Headmistress and report of the Assistant Commissioner Hassan khel Sub Division Peshawar (Ex- APA FR Peshawar). **Annexure-J**
8. Directorate level inquiry also under process, personal comments of this office already communicated before the inquiry officer report of such inquiry is awaited.
9. Moreover, the undersigned also appear before the Deputy Director NAB Peshawar and submitted the comments vide No. 3199 dated: 20.03.2018.
10. Directorate of Education FATA also submitted views/comment in such case before the Deputy Director NAB Khyber Pakhtunkhwa Peshawar vide No. 10698-99 dated: 09.08.2018.

Hence report is submitted.


District Education Officer
Hassan khel Sub Division
Peshawar

OFFICE OF THE HEAD MISTRESS G.G.H.S KHAN ZADA FR PESHAWAR.

NO: 169

DATED: 14/11/17

AS per Request of H/A

AAED (F) / AL

14/11/2017

The Agency Education Officer,
FR Peshawar.

Subject:- Deduction of Salary Primary section.

Memo,

In pursuance of the above noted subject the following has been found absent of duties from 09/11/2017 to 13/11/2017 despite several premonitory notice.

1. Jamila Begum Qalar
2. Mohammad kasif Chowkidar
3. Wakeel khan Beshti

Head Mistress,
G.G.H.S Khan.Zada
FR Peshawar.

Agency Education Officer
FR Peshawar.

نمبر 2267A

منجانب ایجنسی ایجوکیشن آفیسر ایف۔ ار پشاور

بجانب مسی رسماة: جملہ کار، محمد کاشف چوکدار، وکیل پیشگی GGPS Khanzada Killi ایف۔ ار پشاور

عنوان: جواب طلبی

یادداشت: بحوالہ ہیڈمسٹریس رپورٹ خط نمبر: 149 مورخہ: 14-11-2017

بحوالہ ہیڈمسٹریس رپورٹ خط نمبر: 149 مورخہ: 14-11-2017 رپورٹ کے مطابق اپ لوگ بغیر

چھٹی لیے اور پیشگی اجازت یا درخواست کے اپنی ڈیوٹی سے مورخہ 09-11-2017 سے 13-11-2017 تک مکمل غیر حاضر ہے لہذا آپ کو مطلع کیا جاتا ہے۔ کہ نوٹس ہذا کے ملنے کے نورا بعد کم از کم 7 دن یا زیادہ سے زیادہ 14 دن کے اندر اندر اپنی ڈیوٹی پر حاضر ہو کر اپنی غیر حاضری کی وجوہات تحریری طور پر زیر دستخطی کو بیان کریں۔

بصورت دیگر آپ کے خلاف ای اینڈ ایڈمڈی آرڈر 2011ء کی سق 9 کے تحت قانونی کارروائی جس میں آپ کی سروس سے برخاستگی بھی ہو سکتی ہے۔ عمل میں لائی جائیگی۔

ایجنسی ایجوکیشن آفیسر ایف۔ ار پشاور

نمبر 2268-71A مورخہ 15/11/2017

نقول برائے اطلاع۔

(1) ڈائریکٹر ایجوکیشن فاٹا

(2) اسٹنٹ پولیٹیکل ایجنٹ ایف۔ ار پشاور

(3) اسٹنٹ ایجنسی ایجوکیشن آفیسر ایف۔ ار پشاور

(4) ہیڈمسٹریس GGHS Khanzad Killi ایف۔ ار پشاور

ایجنسی ایجوکیشن آفیسر ایف۔ ار پشاور

PAYROLL SYSTEM
 AMENDMENT FORM
 MULTIPLE EMPLOYEE ENTRY

Date: 11/2017

Page No. _____

OFFICE OF THE AGENCY EDUCATION OFFICER FR PESHAWAR

FOR THE MONTH OF 11 /2017

Vendor No. _____

DDO Code

P	R	0	2	1	5
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Description

Absentism

EMPLOYEE DETAILS			Info Type	GENERAL DATA CHANGE		Wage Type	CHANGE IN PAYMENT/DEDUCTIONS			Stop Sal.	Effective Date	Remarks
EMPLOYEE NUMBER	EMPLOYEE NAME	NIC NUMBER		Field ID	New Contents		Amount					
						Rupees	Paise	Adj				
00089521	waheed Khan					5801	4827	=	D	5 days pay deducte		
								=				
00556093	Muhammad Koshik					5801	2981	=	D	Do		

[Signature]
 Agency Education Officer
 FR Peshawar

Prepared By _____

Audited/Checked By _____

Entered/Verified _____

MONITORING & EVALUATION REPORT

I, undersigned paid a comprehensive visit on 25.11.2017 (Saturday) at 9:00 AM.

• CGHS Khan Zada killi FR Peshawar:

a. Staff position:

S.No.	Name	Desig/BPS	Remarks	Action taken
1.	Mehnaz	HM	A	Explanation
2.	Hadia	SST	A	Explanation
3.	Nadia Riaz	SST	A	Explanation
4.	Rubaina Awan	S PET	A	Explanation
5.	Bushra	CT	P	
6.	Hameeda	CT	A	Explanation
7.	Husna	CT	P	
8.	Perveen Naz	AT	A	Explanation
9.	Falak Naz	Qaria	A	Explanation
10.	Salma	Qaria	P	
11.	Rozina	PST	P	
12.	Zeba	PST	P	
13.	Shakiecla	TT	A	Explanation
14.	Nimat	J/C	A	Explanation
15.	M kshif	Chow	P	
16.	Alamzaib	N/Q	P	
17.	Wakeel khan	Beshti	P	
18.	Jamila	Caller	P	
19.	Zahida	Sweeper	P	
20.	Naem Akbar	Mali	A	Explanation
21.	Nazia	L.Au	P	
22.	Hamida	Caller	P	
23.	Yasmin khan	Sweeper	P	

b. Enrolment:

Class	Un-add.	1 st J.	1 st S	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th	9 th	10 th	Total
Present	0	33	29	24	49	23	23	26	19	11	17	0	260
Total st:	0	41	34	31	52	25	24	29	23	12	17	0	294

Remarks:

I the undersigned paid a comprehensive visit to GGHS Khan Zada Killi FR Peshawar on 25.11.2017 at 9:00 AM. Details are as under:

I entered the school at 9:00 AM, but I was really regreted to see that all Major classes like 10th, 9th, 8th, 7th and 6th found vacant. The Head Mistress along with concern senior staff found absent.

I observed that she not only created a group in the staff but also divided the innocent students in two groups. She has not managerial qualities and totally failed to run the school. She is reluctant to maintained the attendance register of class-iv despite of my direction vide dated 10.12.2016(Saturday). She also using very harsh and foul language to the class-iv.

I also received a call from Maj: Baber of Pak Army for the said area at 2:39 PM (call duration 3min, 31 sec). He said that the said Headmistress creating dispute amongst the community and also disturbing the law & order situations and therefore needs to get rid of her.

I personally met the community elders and malaks they also justified the complaint already leveled against her.

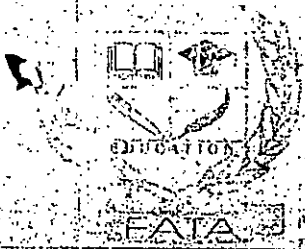
In light of the aforementioned facts I recommended that she may be transferred from this school and replaced by a competent dedicated, and one with good administrative capabilities please.

(Abdur Rauf Shah)
Agency Education Officer
FR Peshawar

Endst: No 233742 Dated: 27/11/2017
Copy to:

1. PA to Secretary SSD FATA Peshawar.
2. PA to Director Education FATA Peshawar.
3. Maj: Pak Army for said Area.
4. Deputy Director E&M FATA Peshawar.
5. Assist: Director AD Monitoring FATA Peshawar.
6. Assistant Political Agent FR Peshawar.

Agency Education Officer
FR Peshawar



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBER ROAD, PESHAWAR, K.P.K.
Phone No: 091-9210145
No. 2342 Dated: 27/11/2017

To

The Headmistress
GGHS Khan zada Killi
FR Peshawar.

Subject: PHYSICAL VERIFICATION

Memo:

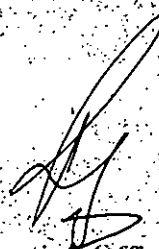
Reference to the Headmistress letter No: 168 dated: 27.11.2017 on the subject cited above, you are hereby directed to inform all the class-iv staff under your jurisdiction to attend the undersigned office on 29.11.2017 at 10:00am along with Original CNIC for physical verification.

Endst; No. 2343-46


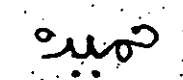

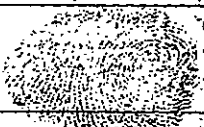

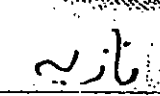

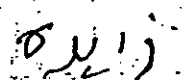

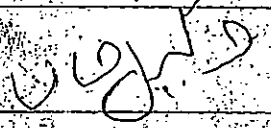

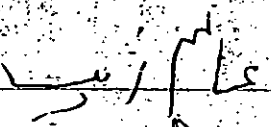

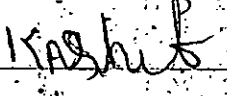
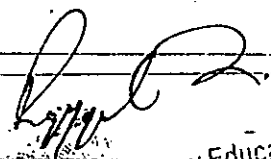
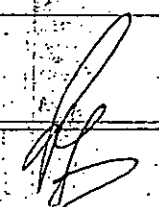
Copy for information to the:

1. Director Education FATA Peshawar.
2. Deputy Commissioner/PA FR Peshawar.
3. Assistant Political Agent FR Peshawar.
4. All class-iv staff GGHS Khanzada FR Pesh.

Agency Education Officer
FR Peshawar


Agency Education Officer
FR Peshawar

**PHYSICAL VERIFICATION OF
NON-TEACHING STAFF GGHS KHAN ZADA KILLI FR PESHAWAR.**

S.No	NAME OF OFFICIALS	F/NAME	Desg	CNIC#	Thumb Impression	Signature
1.	Hamidh	w/o Noor Mahd	caller	17301-1331784-2		
2.	Yasmin Khan	w/o Saeed Rehman	Sweeper	17301-1397952-6		
3.	Nazia	w/o Alam Zeb	Lab. Att	17301-6759467-2		
4.	Zahida	D/o Shahbaz Khan		17301-4862649-0		
5.	Waheed Khan	S/o Gul Shad	Bashti	42000-0450706-7		
6.	Alam Zeb	Saimand Khan	N/A	17301-1277524-5		
7.	Muhammad Kashif	Waheed Khan	chowk	17301-6637935-1		
8.						
9.						
10.						
11.	Assistant Agency Education Officer (Female) FR Peshawar	FAIZ MUHAMMAD Asstt. Agency Education Officer FR Peshawar.				Agency Education Officer FR Peshawar.
12.		29-11-2017				29-11-2017

OFFICE OF THE HEAD MISTRESS G.G.H.S KHAN ZADA FR PESHAWAR.

NO: 1511-

Dated: 22/11/17

To

The Director of Education FATA,
Secretariat Peshawar.

Through:- The Agency Education Officer FR Peshawar.

Subject:- Class IV on French leave.

R/Sir,

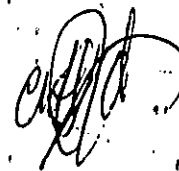
With due respect, It is stated that I Mehnaz Afridi, Head Mistress
GGHS Khan Zada Killi FR Peshawar in unison with teaching staff would like to bring
Your kind attention to continuous absenteeism of class IV.

Despite my several premonitory notice in order book as well as verbally,
They turned deaf ear and termed it as useless. From highly placed sources, it is conformed
That a few of them are living abroad.

As a result their lackadaisical attitude in performing duties has adversely
effected Educational environment as well as mundane concern of day-to-day life in school.

Therefore, it is requested to look into the matter with serious and earnest
Consideration and figure it out as soon as possible.

Thanks.



Head Mistress,
GGHS Khan Zada
FR Peshawar.



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

CHARGE SHEET

In the report of Headmistress GGHS Khanzada FR Peshawar and direction of Director Education FATA Peshawar the competent authority under Khyber Pakhtun khwa Government servants (Efficiency and Discipline) Rules, 2011 do hereby charge you.

1. Mr. Naeem Akhtar Mali GGHS Khanzada Killi FR Peshawar.
 2. Mr. Alam Zeb N/Q GGHS Khanzada Killi FR Peshawar.
- i. That you were reported by Headmistress absent from your duty during long period.
 - ii. With profound regret that official matters of the said school were found badly affected.
1. By reason of the above all are guilty of acts of omissions and commission under section (b) & (c) of rules 3 of the said rules and have rendered yourself liable to all and any of the penalties specified in rule 4 of the rules ibid.
 2. Your written defense, if any, should reach the undersigned within 7 days not more than 15 days failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you all.
 3. Statement of allegation described in para 1 at serial No.(a) above.


*Agency Education Officer
F.R Peshawar*

Endst No: 2449-53 Charge file: Dated 07/12/2017

Copy for information to the

1. Director of Education FATA Peshawar.
2. Assistant Political Agent FR Peshawar.
3. AAEO(F) FR Peshawar.
4. Headmistress GGHS Khanzada with her letter No. dated:
5. Official concerned.

*Agency Education Officer
F.R Peshawar*

Forward Report
A/C
20/12/17 ✓


To

The Agency Education Officer
PR Peshawar.

Subject: CHARGE SHEET.

Memo:

Kindly refer to your office Endst. No 2449-53 dated 07/12/2017 on the Subject cited above.

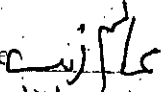

It is submitted with due honour that we are class IV employees and belong to respectable Malik family of our area. All of us including ourselves were at stake due to the life threats by terrorsits/miscreants. Being Class IV employees we were not accustomed/wonted with departmental procedure except submission of application to our immediate boss i.e the said Head mistress and we had done so (Photocopies attached).

The question which rises now that why the Head Mistress concerned could not report us earlier either absent or abroad because she used to pay us half of our salaries and half was deducted by her.

Now we are already present and assure your good self that we will never this commit this practice in future.

It is therefore, request that ours reply may please be accepted and no departmental proceeding be initiated against us please.

Dated 20-12-2017

1. Signature 
Name Adam Zeb
Designation Naibqasid
CNIC No. 17301-1277524-5
2. Signature 
Name Naeem akhtar
Designation Mali
CNIC 22501-8715058-1



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT:
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

No. 255 Dated: 21/12/2017

To

The Director Education
FATA Peshawar

Subject: **REPORT**

Reference to this office charge sheet No. 2449 dated: 07.12.2017 on the subject cited above, it is stated that for your kind information that charge sheet has already been issued against absent class-iv staff on the report of Headmistress GGHS Khanzada Killi FR Peshawar.

It is further submitted that the photocopy of charge sheet and reply of class-iv staff received this office on 20.12.2017 enclose.

It is requested to examined the case through inquiry at high level.


Agency Education officer
FR Peshawar

حضرت جناب سید منیر حسین صاحب
گورنمنٹ گریجویٹ اسکول
خان زادہ گل اف آریٹنر

جناب عالیہ ا

موردیانہ التماس ہے کہ لڑکتے کو سر سے لٹھے شریسنزور
ور دست گردوں کی جانب سے دھکیاں موصول ہو رہی ہیں۔ وہ
بھی سکول کو بھون سے اڑانے کی دھکیاں دیتے ہیں اور بھی لٹھے جان لے
تارے کی دھکیاں دیتے ہیں۔ وہ بروقت ہتہ طلب کرتے ہیں اور ادا
نہ کرنے پر سنگین نتائج کی دھکیاں دیتے ہیں۔ بار بار یہی بات کرتے ہیں
کہ مرد بچوں کو لڑائیوں کے سکول میں تمہارا کیا کام ہے؟ حالانکہ ہم
ان کو ایک دفعہ ہتہ ادا کر چکے ہیں لیکن پھر بھی وہ بار بار یہی
مطالبہ دہرائتے ہیں۔ جناب عالیہ! ان لوگوں کے تعلق کسی جا بس
ہیں چلتا۔ میرے لیے ان حالات میں بہانہ ڈیوٹی کرنا بہت مشکل ہے
اور یہاں رہنا بھی خطرے سے خالی نہیں ہے۔ اسی لیے میں کو سر سے
کا لیے بہانے سے باہر جانا چاہتا ہوں۔

لہذا آپ سے گزارش ہے کہ مجھے کو سر سے کے لیے باہر
جانے کی اجازت دی جائے میں آپ کو بہت مشکور ہوگا۔

الفار میں

آپ کا فرما پر دار

عالم زیب
ناٹب قاصد

عالم زیب

Alam Zeb

خدمت جنات بند مستر نسیں صاحبہ
گورنمنٹ کالج برائے نسوان سکول
خان دادہ کلمے ایف آر پشاور

جناب عالیہ!

موردیاتیہ گزارش ہے کہ میں اس سکول میں بحیثیت کلاس فور
ڈیوٹی سرانجام دے رہی ہوں۔ چند نامعلوم بٹریسٹوں کی طرف سے
میرے خاندان کو کچھ کرشمے سے ڈھکیا گیا ہے۔ یہ بیجا ملامت موصول ہو
رہی ہے۔ وہ ہم سے کھتہ طلب کرتے ہیں اور سکول کو
مکھوں سے اڑانے کی دھمکیاں دے رہے ہیں۔ ہم انہیں پہلے
بھی کھتہ ادا کر چکے ہیں لیکن وہ دھمکیوں کا یہ سلسلہ ختم نہ ہو سکا۔
ان حالات سے محذور ہو کر میرے بیٹے بھائی کو بھی صدمہ چھوڑ
رہا۔ اب وہی دھمکیاں مجھے دی جا رہی ہے۔ میرے لئے یہاں
رہنا اور ڈیوٹی کرنا ناممکن ہے۔

برائے پھر باقی فرما کر مجھے کچھ کرشمے پہلے بیان سے
دور رہنے کی اجازت دی جائے۔ میں آپ کا احسان مند رہوں گا۔

العارض

آپ کا مہربان سردار

N. H. H.

سعید الحسن

خدمت جناب ایچی ایجوکیشن آفیسر الف آر لیشاؤر

عنوان :- شکایت بنام ہیڈ ماسٹر صاحبہ مہناز GHS جی خان زادہ کھلے علی خیل

خاتہ عالی

نہایت آپ کے ساتھ التماس ہے کہ ہم کلاس فور (گورنٹ گھنٹی سکول خان زادہ کھلے علی خیل الف آر لیشاؤر) آپکی خدمت میں ایک شکایت بنام ہیڈ ماسٹر صاحبہ مہناز GHS جی خان زادہ کھلے درج کرنا چاہتے ہیں، تعفیل ذیل قلم ہے۔

تعفیل کچھ یوں ہے کہ آپ نے مورخہ 25/11/2017 کو سکول ہڈ کا ایک اڈمنسٹریٹو وزٹ کیا جس میں آپ نے چشم بخور سکول کا معائنہ کیا، جب آپ آئے تو اس وقت

لیشاؤر سٹاف بمع میڈم صاحبہ غیر حاضر بائے گئے اور اس وقت وہ سکول میں موجود نہیں تھیں اور پھر آپکی موجودگی میں میڈم صاحبہ بمع لیشاؤر سٹاف سکول پہنچ گئیں۔

بھر وزٹ کرنے کے بعد آپ چلے گئے مگر سکول میں میڈم صاحبہ نے اخلاقیات کے تمام حدود توڑ دیئے کیونکہ آپکے خانے کے بعد میڈم صاحبہ انتہائی غصہ ہوئی اور اس نے تمام غصہ کلاس فور اور لوکل سٹاف پر نکال دیا، اس

نے سب کے سامنے کلاس فور اور لوکل سٹاف کی ایک ممبرہ پر جسمانی تشدد کیا جس کی وجہ سے ان کی حالت غیر ہوئی اور ان کو طبی امداد کے لئے فوری طور پر

ہسپتال لے جایا گیا، اس موقع پر خاصہ دامن فوری اطلاع ہوئی اور وہ موقع پر پہنچ گئے، کلاس فور کو سکول سے نکال دیا گیا تھا ایڈ گھنٹی کی سیکورٹی

کی ذمہ داری فوری طور پر خاصہ دامن فوری نے سنبھالی

اس کے علاوہ چونکہ حالات سنگین تھے اور میڈم کو ایسی سنگین جھٹکی کا بھی ادراک ہو گیا تھا ایڈ اس نے، دفاع کیلئے سکول کی چھٹی بھی آدھا گھنٹہ لپٹ کی، اس لپٹ

چھٹی کی وجہ یہ تھی کہ میڈم اپنی دفاع میں سینئر کلاس کی بچیوں سے ایک

لیٹر لے کر دستخط لے رہی تھی مگر اس وقت میں کہ خط میں کیا تھا لیکن بچیوں کا نام سکول

Office Order No. 787
Date: 27/11/2017

یہ تعلیم حاصل کرنا ہے کہ لیجے ان کو دوسرے ذاتی مقاصد کے لئے استعمال نہ ہو
 بچوں کو ڈرایا اور دھمکایا جاتا ہے کہ جس کے بعد میں رسم ماحصہ کو جاری
 ہے ان سے کہلاتی ہے

ایک اور ہزاروں اور قابل کو یہ بات یہ ہے آئیڈیو منع ڈال کر ریڈ
 میڈم ماحصہ کی تمام وکات اور اخلاقیات کا بخوبی ادراک ہے اور اس کی
 شکایات پہلے ہی آپ سے کی جا چکی تھی

لیکن آپ سے سیدر دائہ التماس ہے کہ میڈم ماحصہ کے خلاف
 حکم نہ کاروائی صادر فرمائیں تاکہ اُسے روز لڑائی جھگڑوں سے محفوظ رکھا جاسکے
 حاکم

AGD FR Pesh
 m/a

الماضی
 حوالہ ملا اس نذر و نشان ایسی علی
 (44HS) خان زاد علی علی

27/11/17

بڑنمبر	نام	عہدہ	کتاب
01	محمد کاشف	چوکیدار	Kashif
02	عالم زبیر	ڈپٹی کامند	عالم زبیر
03	دکین خان	پیشی	دکین خان
04	سید علی الرحمن	صنعت	سید علی
05	نور محمد	مدرس	Malik Samee-Ur-Rehman Asho Khel (Ali Khel) FR. Pesh
06	حاجی خان - ضلع ایف اے کمانڈر ایف اے	کامی لہر اے الفلاح	FRPK

MALIK MIR ALAM KHAN
 (Ali Khel) Asho
 F.R. Pesh

سیان
 علی احمد

1 ڈائریکٹر ایجوکیشن
 2 ڈائریکٹر ایجوکیشن
 ڈائریکٹر ایجوکیشن

لوگوں کی توجہ کیلئے

صاحبانِ اسکول کے لئے

55
Date

Pamir/2025
30/11/25

لڈویجی بیجا جاتا ہے۔ کورونٹ لڈویجی اسکول خاندان کو ملے گا کہ پشاور

کے سارے ملاحس فور ملازمین باقاعدہ ڈیوٹی سہارا دے رہے ہیں۔
خلاصہ 25 نومبر 2025 (AEO) کے بارے میں
معمول کے مطابق اصول کا دورہ بنا۔ اور
لاہور (ABDI) کے بارے میں

نے دورہ اسکول کیا۔ مقررہ اہل عمل
نے باقاعدہ ضابطہ کی جیسی آئیے ملازمین
فور حاضر تھے۔ علاوہ (AEO) کے بارے میں
نے بھی دفتر میں ملازمین فور کی تقریق کی
صفت کے لئے آئیے

30/11/25
5-8658911-25501

صاحبانِ اسکول
مہر اور توجہ کیلئے
مہر اور توجہ کیلئے
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مہر اور توجہ کیلئے

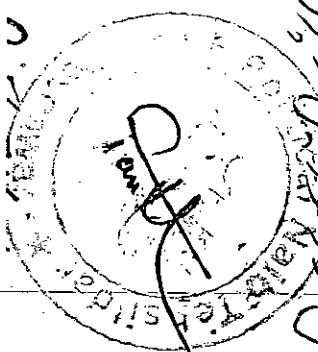
Malik Sameer-Ur-Rehman
FR, Peshawar
Asho Khel (All)

صاحبانِ اسکول

نومبر 2025 کے لئے
مقررہ خاندان کو ملے گا کہ پشاور
ڈیوٹی کے لئے پشاور میں

نومبر 2025
نومبر 2025

صاحبانِ اسکول
مہر اور توجہ کیلئے
مہر اور توجہ کیلئے
مہر اور توجہ کیلئے
مہر اور توجہ کیلئے



no 440/Por
30/11/17

To

Political Agent, FR Peshawar

Subject: Absent class four servants doing jobs abroad and in Karachi want salary every month and their relatives become intimidating and threatens for marking them absent

Dear Sir,

With due respect, It is stated that I headmistress in Govt. Girls high school Khanzada school F.R.Peshawar. In that school, class four servants BPS-1 grades never do duty and remain absent. Some of them are abroad and their passports can be checked to see Entry and Exit record. I am headmistress and am responsible to insure they are present. I verbally informed my seniors many times but no action was taken. I tried to make a proper register to insure that do proper duty and are present during duty hours. This made some relatives of these class four servants intimidating and adopt threatening attitude. They want to draw salary freely without duty.

In such scenario, I request you to help me in this regard as I have no personal dispute or property dispute with them. This is pure a matter of hooliganism that they want free salary without doing duty for a single day. I want that they do duty. There is no issue whatsoever except that they do jobs abroad and gets salary freely. All those class four servants should be called to your offices every week to insure they do not go abroad and to Karachi for jobs and do not get free salary. I request to help me provide support and security to Govt. girls high-school Khanzada, FR Peshawar.

Thanks

Your sincerely,

Head mistress and Teaching Staff Of Govt. Girls school Khanzada, FR Peshawar.

Copy To:

1. Governor Khyber Pakhtunkhwa
2. Secretary to governor
3. Chief secretary Khyber Pakhtunkhwa
4. Home secretary, Khyber Pakhtunkhwa
5. Chief justice, Peshawar high court

AE0 FR Pesh
n/a

Por
7/14/17

Por
report

Office of The Asst
Dary
Date 29/11/17
FR Peshawar

PM
Por
July 30/17

Por
7/30/11/17



FATA SECRETARIAT
DIRECTORATE OF EDUCATION

KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

No. 2374 / 2018
Date 12/2 / 2018

*All
Report on war post*

13/02/2018

To

The Agency Education Officer
FR Peshawar.

Subject: COMPLAINT.
Memo:

I am directed to enclose herewith a copy of letter No.FS/ E/ 100-96/inq/1199-1202 dated-29-01-2018 received through the Deputy Secretary (Services) FATA Secretariat warsak Road Peshawar on the subject cited above and to ask you to furnish views/comment within 3 days of the receipt of this memo for onward transmission to the quarter concerned, please.

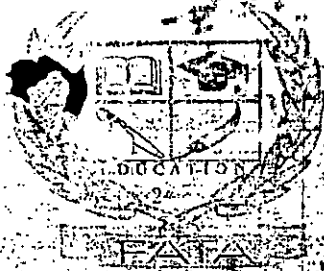
Az 8/2/2018
Deputy Director (F&A)

Endst: No. 7

Copy to the:-

1. Deputy Secretary (services) FATA Secretariat.
2. P.A to Director Education FATA.

Deputy Director (F&A)



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR

BLOCK 8 NEAR INFORMATION DEPT.
KHYBER ROAD, PESHAWAR, K.P.K.
Phone No. 991-9210145

No. 3000 Dated 19/12 2018

To

The Director Education,
FATA Peshawar.

Subject:- **COMPLAINT**

Memo:-

Kindly refer to your office letter No. 2374 dated: 12.02.2018 on the subject cited above,

It is submitted that the low grade employees of GGHS Khanzada FR Peshawar were reported as absent by the then Headmistress of the said School with letter NO. 149 dated: 14.11.2017 with subject "Deduction of salary (Primary Section)". Consequently this office served show cause No. 2267-A on 15.11.2017. The salary of class-iv naming Mr. Muhammad Kashif chowk and Mr. Wakeel Khan Behishti were deducted as per report 5 days each (Copy attached). Consequently they given charge sheet vide No. 2449-53 dated: 07-12-2017 07.12.2017 and moreover all class-iv were called to Agency Education office for physical verification on 29.11.2017 vide No. 2342 dated 27.11.2017. All of them attended the office of the undersigned and they were physically checked and verified.

In response to the charge sheet, they conveyed that they were absent owing to the growing stake/threat of terrorism as they belong to prominent Malik family of the region.

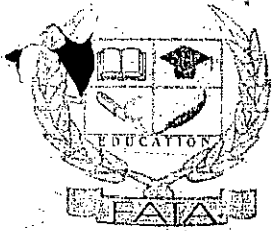
In such circumstance they had properly submitted application asking for Departmental permission to the then Headmistress but she has not processed that permission due to taking half pay from us, as per their written statement. (Photocopy attached).

Subsequently the undersigned submitted a letter along with their replies vide letter No. 2764 dated 24.01.2018 therein asking for further necessary action.

Further the photocopies of the class-iv attendance register are concerned, previously it was not maintained in the school despite of the direction of AEO vide dated: 10.12.2016 (Saturday) to the then Headmistress, now it is being maintained since November, 2017. Now, all the class-iv employees are present and have been physically verified.

Forgoing in view, it is requested that what kind of penalty/proceeding may be initiated in the instant case as she was herself the then DDO/Headmistress of the said school.

Agency Education Officer
FR Peshawar



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145
Email Add: fr_peshawar@yahoo.com

No. _____ Dated: 15/3 /2018

To

The Headmistress
GGHS Khanzada Killi
FR Peshawar.

Subject:- PROVISION OF RECORD/INFORMATION.

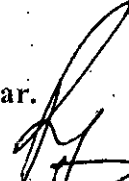
Reference to your letter No. 3875 dated: 15.03.2018 on the subject cited above, it is stated that to submit the requisite information to the Director General Govt. of Pakistan national Accountability Bureau Peshawar immediately under intimation to this office.

Agency Education Officer
FR Peshawar

Enst; No. 7173-74 Dated: _____ /2018

Copy to the:-

1. Director Education FATA with his letter No & Dated:
2. Director General of Pakistan National Accountability Bureau Peshawar.


Agency Education Officer
FR Peshawar



OFFICE OF THE
 AGENCY EDUCATION OFFICER
 FR PESHAWAR
 BLOCK, BINAIR INFORMATION D.I.P.I.
 KHAYRI P. ROAD, PESHAWAR, K.P.K.
 Phone No. 091-9210145
 Email Add: fr_peshawar@yahoo.com

No. 3/99 Dated: 20/3/2018

The Additional Director(Staff)
 NAB Peshawar.

Subject:- PROVISION OF RECORD/INFORMATION PESHAWAR.
 Memo:-

Reference to letter No. 3875 dated: 15.03.2018, received from Addl: Director Education FATA directed to this office to submit requisite information regarding class-iv employees of GGHS Khan Zada Killi FR Peshawar to the Additional Director(Staff) Govt. of Pakistan National Accountability Bureau Peshawar. In this regard requisite information/corresponding about the said School employees has already been submitted vide this office letter No. 2764 dated: 24.01.2018 (Letter Attached) to the Director Education FATA as per prerogative. This office recommended departmental (Directorate level) enquiry against the manner which is in process. However, available information and corresponding is submitted in your kind honor please.

Case No. 4000

Dated: 20/3/2018

[Signature]
 o/c Agency Education Officer
 FR Peshawar

Copy to file:-
 1. Director Education FATA with his letter No & Dated:

[Signature]
 o/c Agency Education Officer
 FR Peshawar



Khyber Pakhtunkhwa

*ALC
provide the info
visit with me
immediately
07/08/18*

GOVERNMENT OF PAKISTAN
NATIONAL ACCOUNTABILITY BUREAU
PDA COMPLEX BLOCK-III PHASE-V HAYATABAD
KHYBER PAKHTUNKHWA PESHAWAR

SAY NO TO CORRUPTION

No. 7-4(20)/W-III/NAB(KP)/2018/
August, 2018

To:

Director Education,
FATA Secretariat,
Warsak Road, Peshawar.

Subject:

PROVISION OF INFORMATION U/S 19 OF NAO, 1999 – INQUIRY AGAINST OFFICERS / OFFICIALS OF DIRECTORATE OF EDUCATION, FATA AND OTHERS REGARDING CORRUPTION & CORRUPT PRACTICES IN EMPLOYMENT OF GHOST EMPLOYEES IN PRIMARY SCHOOLS IN FR PESHAWAR (NABKP20180223114633)

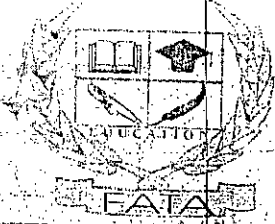
This Bureau is conducting the subject inquiry under the provision of the National Accountability Ordinance (N.A.O), 1999. The information / documents useful or relevant to the inquiry in your control or you are acquainted with the facts and circumstances of the case.

2. Therefore, it is requested to provide to certified and legible copies of the under-mentioned information / record by hand through a well conversant Officer to the Investigating Officer **Mr. Muhammad Faiq Ali** for examination, on or before **August 8th, 2018**, at NAB Khyber Pakhtunkhwa Block-III, PDA Complex, Phase-V, Hayatabad, Peshawar.

- a. Total Number of Class IV Employees in GHSS Khanzada with their Names, CNIC Numbers, Designation, Dates of Appointments, Addresses, Current Status of Employment & Leave(s) availed. ✓
- b. Official Notification, if any regarding leave awarded to Class IV Employee of GHSS Khanzada Killi. ✓
- c. FATA Secretariat rules & Regulations under which these Schools are governed. ✓
- d. Leave rules & complete procedure for awarding leave to Class IV Employees. ✓
- e. Detailed procedure for disbursement of salary to Class IV Employees.

Page 1 of 2

*VIDE (FATA)
For info
07/08/18*



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145
No. 5295 Dated: 8/8 /20

To:

The Director Education
FATA Peshawar

Subject: Provision of information /record u/s 19 of NAO 1999-Inquiry against officers/Officials of Directorate of Education FATA and others regarding corruption & corrupt practices in employment of Ghost Employees in Primary schools in FR Peshawar (NABKP20180223114633)

Memo:

Reference to NAB letter No. 7-4(20)IW-III/NAB(KP)/201/ dated: 03.08.2018 on the subject cited above, enclosed please find herewith the requisite information regarding the non-teaching staff at GGHS Khanzada Killi FR Peshawar, is submitted for further necessary action please.

o/c
Agency Education Officer
FR Peshawar



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145
Email Add: fr_peshawar@yahoo.com

CERTIFICATE

This is to certify that the below class-iv draw their salaries from Addl: Accountant General (PR) sub office Peshawar through their own bank account with the approval of the concerned school Headmistress(DDO).

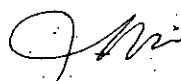
Headmistress (DDO)

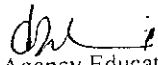
S.No	Name of official	Desig	Bank Branch	Account No.
1.	Nazia	Lab: Attd:	NBP Pesh Cantt:	4038828945
2.	Zahida Bibi	Sweeper	NBP Kohat Road	3097790198
3.	Naeem Akhtar	Mali	NBP Pesh Cantt	4038828936
4.	Yasmeen	Sweeper	NBP Pesh Cantt:	4038828990
5.	Alamzeb	N/Qasid	MCB, Mallani	BBA-1000378
AEO FR Peshawar (DDO)				
6.	Muht Kashif	Chowkidar	NBP Kohat Road	3097790072
7.	Wakil Khan	Behishti	NBP Kohat Road	3097790063
8.	Hameeda Bibi	Caller	MCB Mattani Pesh	0532858831000310

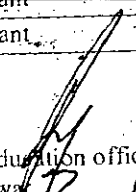

Agency Education Officer
FR Peshawar

OFFICE OF THE AGENCY EDUCATION OFFICER FR PESHAWAR
NON-TEACHING STAFF GGHS KHANZADA KILLI FR PESHAWAR.

S.No	Name-of officials	F/Name	Desig	CNIC	D/O Apptt:	Leave availed	Address
1.	Hamida	W/O Noor Muhd	Caller	17301-1331784-2	Endst; No. 3694 dt: 01.11.1987	Nil	Village Ali Khel P/O sherkera FR Peshawar.
2.	Yasmin Khan	w/O Saedd Rehman	Sweeper	17301-1397952-6	Endst: NO. 3858-88dt: 19.11.2012	Nil	-do-
3.	Nazia	W/O Alaim zeb	Lab: Attd:	17301-6759467-2	Endst: NO. 3858-88dt: 19.11.2012	Nil	-do-
4.	Naeem Akhtar	Samand Khan	Mali	22501-8715058-1	Endst: NO. 3858-88dt: 19.11.2012	Nil	-do-
5.	Zahida	Shahbaz Khan		17301-4862649-0	Endst: No. 3989-93 dt: 05.09.1995	Ex-Pakistan leav w.e.f 01.08.2018 to 14.09.2018	-do-
6.	Wakil Khan	S/O Gul Shad	Beshishti	42000-0450706-7	Endst; NO. 4166-70 dt: 05.09-1981	Nil	-do-
7.	Alam Zeb	Samand Khan	N/Qasid	17301-1277524-5	Endst: NO. 3984-88 dt: 05.09.1995	EOL: w.e.f 01.04.2018 to 31.03.2019	-do-
8.	Muhammad Kashif	Wakil Khan	Chowkidar	17301-6637935-1	Endst: No.	Nil	-do-
9.	Vacant		Behishti				Vacant
10.	Vacant		Caller				Vacant


 Asstt. Agency Education officer (F)
 FR Peshawar


 Asstt. Agency Education Officer (M)
 FR Peshawar.


 Agency Education officer
 FR Peshawar.

03/08/18

o/c

RECEIVED

FATA

OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: ENLAR INFORMATION DEPT.
KHYBER ROAD, PESHAWAR, K.P.K.
Phone No. 093-0230345

GRANT OF EXTRA ORDINARY LEAVE.

Under the provision of the Provincial Government of Khyber Pakhtun
Khwa Peshawar revised leave rules- 1981, Sanction is hereby extent grant of Extra
Ordinary leave (Leave without Pay) with effect from 01.04.2018 to 31.03.2019. (365
days) in favor of Mr. Alam Zeb Naib Qasid GGHS Khanzada Kili FR Peshawar.

Note: Necessary entry to this effect should be made in his service Book and other office
record.

AGENCY EDUCATION OFFICER
FR PESHAWAR

Endst. No. 4053-57 Dated: 5/4 /2018

Copy for information and necessary action to the:-

- 1) Additional Accountant General (PR) Sub Office Peshawar.
- 2) Headmistress GGHS Khanzada Kili FR Peshawar.
- 3) AAEO (I) FR Peshawar.
- 4) Accountant Local Office.
- 5) Official Concerned.

AGENCY EDUCATION OFFICER
FR PESHAWAR

Agency Education Officer
FR Peshawar

Section 101 of the Internal Revenue Code

Section 101

Section 101 of the Internal Revenue Code provides that the estate tax shall be imposed on the gross estate of a decedent, less certain deductions. The gross estate is defined as the total value of the property owned by the decedent at the time of death, including real estate, personal property, and any interests in property. The deductions allowed include funeral expenses, debts, and taxes payable by the estate.

The estate tax is imposed on the estate of a decedent who is a citizen or resident of the United States at the time of death. The tax is calculated on the net value of the estate after the deductions have been taken. The tax rate is graduated, ranging from 18% to 57%.

Section 101 of the Internal Revenue Code
provides that the estate tax shall be imposed on the gross estate of a decedent, less certain deductions.

Section 101 of the Internal Revenue Code, as amended, is effective for estates of decedents who die on or after 1957.

Section 101 of the Internal Revenue Code
provides that the estate tax shall be imposed on the gross estate of a decedent, less certain deductions.

OFFICE OF THE AGENCY EDUCATION OFFICER, PESHAWAR
APPOINTMENT

Consequent upon the nomination of the Competent Authority the following Class-IV Candidates of FR Peshawar are hereby appointed purely against vacant post in RPS-1 (Rs. 4200-150-9300) plus usual allowances as admissible under the existing rules on contract/regular non pensionable basis with effect from the date of taking over charge in the interest of public service on the following terms and conditions:-

S.No.	Name & Father Name	Name of Post	Name of School	Remarks
		Against Apptd:	Aginst Apptd:	
1)	Mr. Naeem Akhtar S/O Samand Khan, Wali R/O Ali Khel Asho Khel	Wali	CGHS Khan Zada Kaley FR Peshawar	W/Post
2)	Ms. Yasmin Khan W/O Saadour Rehman, R/O Ali Khel Asho Khel	Sweeper	-do-	-do-
3)	Ms. Nazia D/C Waras Khan R/O	Lab:Attendant	-do-	-do-

TERMS AND CONDITIONS

- 1) Charge Report should be sent to all concerned;
- 2) The Appointment of the Candidates, being purely on temporary basis and is liable to termination at any xxxxx time w/o any notice;
- 3) If the candidates wish to resign their post they will give one month prior notice or his pay for one month will be forfeited in lieu thereof;
- 4) They should produce their original documents i.e. Domicile, CNIC etc for proper verification from the quarter concerned.
- 5) They should produce their health and age certificate from the Medical Superintendent concerned.
- 6) They may not be handed over charge if their age are below 18 years or above 45 years.
- 7) If any technical defect flow is pointed out the appointment will stand cancelled.
- 8) The Appointees will not be entitled to Pension/commutation of PFund emoluments, however C.P.Fund will be deducted as per rules.

(SYED HUSSAIN RAJID)
 AGENCY EDUCATION OFFICER
 FR PESHAWAR

Encl: No. 2585-88 / Dated Pesh: the 19/11/2012

- For information and necessary action to the:-
- 1) Addl. Accountant (PR) Sub Office Peshawar
 - 2) H/O/In-charge, CGHS Khan Zada Kaley FR Peshawar
 - 3) APO FR Peshawar // r/o his No-7104 Dt: 6-11-12
 - 4) Candidates concerned

AGENCY EDUCATION OFFICER
 FR PESHAWAR

Agency Education Officer

OFFICE OF THE AGENCY EDUCATION OFFICER, KHYBER AGENCY AT JAMRUD

APPOINTMENT ORDER

Mr./Miss/Mrs. Zahida Bhatti Son/Daughter of Shahbaz Khan

is hereby appointed as Sweeper Post at GGNS Khan Zada Killi, F.R. Peshawar BPS No. 01
of Rs. 1245/-P.M. PM fixed plus usual allowances as admissible under the rules with effect from
the date of His/Her taking over charge against a Newly Created Sweeper Post w.e.f. 1.9.1995.

Note:

- A. Charge report should be submitted to all concerned.
- B. The appointment of the candidate is being made purely on temporary basis and is liable to termination any time without any notice. In case He/She wishes to resign his/her post He/She shall have to give one month prior notice or forfeit one month pay in lieu thereof. His/Her services will be terminated if He/she is not selected by the selection committee.
- C. His/Her Original Education Qualification, date of birth and Domicile Certificate should be checked before He/She is handed over charge of the post and attested copies thereof be kept on record of the school/office.
- D. He/She should produce Health and Age Certificate from the Agency Surgeon Concerned.
- E. Age should be accorded to the Government Rules.
- F. He/She fails to report within 15 days the order will be treated as cancelled.

(ABDUL RASHID QURASHI)
Agency Education Officer,
Khyber Agency at Jamrud

Endst. No. 3989-93 / Dated 5/9 / 1995

- A. Director of Education (FATA) NWFP, Peshawar.
- B. Agency Account Office, at Peshawar.
- C. Head Master/Head Mistress GGNS Khan Zada Killi, F.R. Peshawar
- D. A.P.C. Khyber/F.R. Peshawar.
- E. Candidate Concerned.

Agency Education Officer
F.R. Peshawar

Agency Education Officer,
Khyber Agency at Jamrud

OFFICE OF THE
AGENCY INSPECTOR OF SCHOOLS
KHYBER AGENCY & FR PESHAWAR

APPOINTMENT

The following appointments of Class IV Servants in Frontier Region Peshawar are hereby ordered in the interest of Public Service with immediate effect i.e. with effect from 1.9.81.

SNO.	NAME OF CANDIDATE	REMARKS
1.	Makil Khan S/O Gul-Shah	GPS/Khanzada killi. Appointed as Bahishti Rs. 250/-PM plus usual allowances against newly created post. (As a Bahishti).
2.	Gul Shah S/O Mir Haidar Khan	GPS/Khanzada killi. Appointed as Choukidar Rs. 250/-PM plus usual allowances against newly created post.
3.	Jamila D/O Khanzad	-do- Appointed as a Callar Rs. 250/-PM against newly created post.
4.	Said Amin S/O Sher Badshah	GPS/Sher badshah killi. Appointed as a Choukidar Rs. 250/-PM against newly created post.

- Note:-
1. Charge reports in duplicate should be submitted to this office.
 2. Their appointments are being made on temporary basis and liable to termination at any time without any notice or assigning any reason. In case they wish to resign they will have to give One Month Prior Notice or will forfeit One month pay to the Government.
 3. They are directed to produce health and age certificate from the Civil Surgeon, Peshawar.

(GHULAM MUSTAFA KHAN)
AGENCY INSPECTOR OF SCHOOLS
KHYBER AGENCY & FR PESHAWAR.

POST NO. 4166-70 DATED PESHAWAR THE 5/9 1981.

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

1. The Candidates concerned,
2. The APC/FR and A.A.I.S. FR-Peshawar.

AGENCY INSPECTOR OF SCHOOLS
KHYBER AGENCY & FR PESHAWAR.

Agency Education Officer
F.R. Peshawar.

OFFICE OF THE AGENCY EDUCATION OFFICER, KHYBER AGENCY, AT JAMRUD

APPOINTMENT ORDER

Mr/Miss/Ms. Salim Zeb Son/Daughter of Saimand Khan

is hereby appointed as Najib Qasid at GGMS, Khan Zada Kili, P.R. Pesh. in BPS No. 01

of Rs. 1215/- P.M. PM fixed plus usual allowances as admissible under the rules with effect from the date of His/Her taking over charge against a Newly Created N. Qasid Post. v. c. i. 1, 9, 1995.

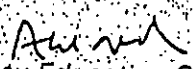
Note:


- A. Charge report should be submitted to all concerned.
- B. The appointment of the candidate is being made purely on temporary basis and is liable to termination any time without any notice. In case He/She wishes to resign his/her post He/She shall have to give one month prior notice or forfeit one month pay in lieu thereof. His/Her services will be terminated if He/she is not selected by the selection committee.
- C. His/Her Original Education Qualification, date of birth and Domicile Certificate should be checked before He/She is handed over charge of the post and attested copies thereof be kept on record of the school/office.
- D. He/She should produced Health and Age Certificate from the Agency Surgeon Concerned.
- E. Age should be accorded to the Government Rules.
- F. He/She fails to report within 15 days the order will be treated as cancelled.

(Saimand Khan Zada)
Agency Education Officer,
Khyber Agency at Jamrud

Encls. No. 3984-88 / Dated 5/9/1995.

- A. Director of Education (FATA) NWFP, Peshawar.
- B. Agency Account Office, at Peshawar.
- C. Headmaster/Head Mistress GGMS, Khan Zada Kili, P.R. Peshawar.
- D. A.P.C. Khyber/FR Peshawar.
- E. Candidate Concerned.


Agency Education Officer,
Khyber Agency at Jamrud.


Agency Education Officer
P.R. Peshawar.

Agency No. 9970030004
 Grade: 04 NTH: 0
 (00000253) A H U R T
 LBRK/FUND
 REPRIID BALANCE 150,245.00
 REPRIID ACCT: 19 100 PNC114

20,930.00
 272.00
 1,753.00
 1,568.00
 1,808.00
 500.00
 301.00
 1,718.00
 2,050.00
 30,294.00

820.00
 50.00
 100.00
 300.00

3004.00
 3681.00
 3701.00
 3705.00

3004.00
 3681.00
 3701.00
 3705.00

29,504.00
 07.02.2013 28.02.2013
 ACCT: 19 100 PNC114

Agency Development Officer
 R.R. Pedrowicz
 NET PAY
 PESHABR

1,300.00
 00001453
 10667FUND
 CPEA: 19 000750

30,294.00
 00001453
 10667FUND
 CPEA: 19 000750

30,294.00
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 CPEA: 19 000750

30,294.00
 00001453
 10667FUND
 CPEA: 19 000750

AMOUNT		Prev Pers No: 99990235030 Desig: DEHISHTI	(00000243) Grade: 02 NT8: 0	Buckle No.: PRINCIPAL	Gazetted/Hos-Gazette
DEDUCTIONS		AMOUNT	LOAN/FUND	REFAID	BALANCE
0801 Basic Pay	19,210.00	3002 CPF Subscription - Rs	710.00-	GPF#:	216,757.
0046 Personal Pay (Maxim 6	890.00	3661 E. E. F. (Exchange)	50.00-	EPU 030652	
1000 House Rent Allowance	911.00	3701 -Renevolent Fund/Excha	120.00-		
1210 Convey Allowance 20	1,745.00	3705 R. Ben & Death ComplE	300.00-		
1309 Medical Allowance	1,500.00				
1518 Dress/Uniform Allow	100.00				
1529 Nonattractive Area A	1,000.00				
1567 Washing Allowance	150.00				
2211 Adhoc Relief All 201	1,859.00				
2224 Adhoc Relief All 201	2,820.00				
PAYMENTS	29,325.00	DEDUCTIONS	1,180.00-	NET PAY	28,145.00
Branch Code: 231512	KDHAT ROAD	NATIONAL BANK OF PAKISTAN	KDHAT ROAD PESHAWAR	PESHAWAR	01.02.2018 28.0
					Acct. No: 7091-9

Agency Education Officer
 H.P. Peshawar

1522 Unattractive Area A	100.00
1528 Unattractive Area A	1,000.00
1567 Washing Allowance	150.00
2148 Adhoc Relief All	277.00
2189 Adhoc Relief All 201	195.00
2211 Adhoc Relief All 201	932.00
2224 Adhoc Relief All 201	1,145.00

PAYMENTS 19,415.00
Branch Code: 231512 KDNAT ROAD

DEDUCTIONS 570.00-
NATIONAL BANK OF PAKISTAN KDNAT ROAD PESHAWAR

NET PAY PESHAWAR 18,845.00 01.02.2018 28.02.2018
Acct. No: C 1001-3

Draw Pers No: A-ROUNT DESIGN: CHOKKIDAR (00000357) Grade: 01 MTH: LOAN/FUND
Post No: PRINCIPAL Gazetted/Non-Gazetted: H REPAID PESHAWAR

Accounts Office ANPS (SB) PESH
PAYROLL REGISTER
For the month of February, 2018

Page: 291
Date: 19.03.2018

0001 Basic Pay	11,150.00
1000 House Rent Allowance	291.00
1210 Convey Allowance 20	1,785.00
1300 Medical Allowance	1,500.00
1518 Dress/Uniform Allow	100.00
1528 Unattractive Area A	594.00
1567 Washing Allowance	150.00
2211 Adhoc Relief All 201	932.00
2224 Adhoc Relief All 201	1,116.00

PAYMENTS 18,204.00
Branch Code: 231512 KDNAT ROAD

DEDUCTIONS 924.00-
NATIONAL BANK OF PAKISTAN KDNAT ROAD PESHAWAR

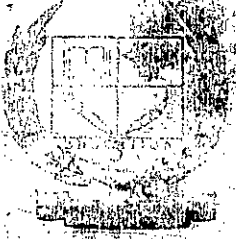
NET PAY PESHAWAR 17,280.00 01.02.2018 28.02.2018
Acct. No: 7007-E

Payroll Section: 006 Section 4

Cash Letter: CPFI: 14,492.00

3500 GPF Other Govt. Emp	400.00
3640 Emp. Edu. Fund	10.00
3657 Group Insurance (GATA)	44.00
3661 E.C.F. (Exchange)	50.00
3701 Benevolent Fund (Exch)	170.00
3705 R. Ben & Death Compl	300.00

Agency Education Officer
F.R. Peshawar



File #
AAEOLM
13/08/18

DIRECTORATE OF EDUCATION
NMD OF KHYBER PAKHTUKHWA.
KHYBER PAKHTUNKHWA, WARSAK ROAD, PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX: 091-9210216

No. _____
Dated Pesh: the _____ / _____ / 2018

To :

The Deputy Director (Coord) for
Directorate IW -III National Accountability
PDA Complex Block -III Phase -V Hayatbad
Khyber Pakhtunkhwa Peshawar.

Subject: PROVISION OF INFORMATION U/S 19 OF NAO, 1999-INQUIRY
AGAINST OFFICERS / OFFICIALS OF DIRECTORATE OF
EDUCATION, FATA AND OTHERS REGARDING CORRUPTION
& CORRUPT PRACTICES IN EMPLOYMENT OF GHOST
EMPLOYEES IN PRIMARY SCHOOLS IN FR
PESHAWAR(NABK 20180223114633).

Memo:

I am directed to refer to your office letter No- 7-4(20) IW -III /NAB (KP)
/2018/1796- 03 August 2018 on the subject cited above and to state that the requisite
information is hereby submitted as desired, please.

Dy Director (F&A)

Endst:No 10698-99 Dated 9 / 8 /2018.

Copy Forwarded to the :-

1. Education Officer District Peshawar sub: Division. Hasan Khel.
2. PA to Director NMD of Khyber Pakhtunkhwa Peshawar.

Dy Director (F&A)

9/8/18

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 391-/2018

Filed by Mehnaz AFridi HM GGHS Samand Khan Killi HSD Peshawar.

Vs

Director Education NMD Peshawar Erstwhile FATA and others

Subject: Report by Respondent No.3 Respectfully submitted as:

1. That honorable court has directed respondent No.3 i.e Additional Agency education Officer Hassan khel sub Division Peshawar (Ex-FR) vide order No. dated: 19.02.2019.
2. The answering respondent has taken following actions against the reported officials vide letter No. 149 dated: 14.11.2017. (Annexure-A)
 - a) Mr. Wakeel Khan Beshishti GGPS Khanzada Killi HSD Peshawar.
 - b) Mr. Kashif Khan chowkidar GGPS Khanzada Killi HSD Peshawar.
 - c) Ms. Jamila Begum Caller GGPS Khanzada Killi HSD Peshawar.They were reported by the appellant on 14.11.2017 vide letter NO. 149 photocopy attached as annexure -B
3. The answering respondent No.3 investigate and found that official at serial No.(C) name JAMILA BEGUM CALLER was retired on superannuation age w.e.f 02.04.2017 after noon vide order No. 1128-33 dated: 18.05.2017. so the appellant being DDO of said school is herself negligent. The official at Serial No. (A) and (B) were accordingly proceeded and were called for explanation vide lette No. 2268-71/A dated: 15.11.2017 photocopy attached (Annexure-C)
Subsequently the reply submitted by the said officials was not satisfactory, Therefore proper deduction for the mentioned absent period was made from their monthly salaries photocopy attached (Annexure-D)
4. The appellant also report vide letter No. 151 dated: 22.11.2017 copy attached (Annexure-E)

(1). Mr. Naeem Akhtar Mali

(2) Mr. Alam Zaib N/Q


While the undersigned accordingly proceeded against them and issued charge sheet vide letter No. 2449-53 dated: 07.12.2017 copy attached. (Annexure-G)F

5. In reply the said official stated that they were threaten by the terrorists/ miscreants as they belong to respectable Malik family and they admitted that they were absent from duties with the connivance of appellant, as she was a DDO of the said school since 08.04.2013 till her transfer and had instigate them to

remained absent because she received monthly portion of their salaries copy attached annexure-*G*

6. The answering responding keeping in views the written statement of reported class-iv proposed for inquiry/investigation vide letter No. 3000 dated: 19.02.2018 to responding no.1 i.e Director Education NMTD Peshawar. *annexture -H*
7. As reminder vide no. 6738 dated: 08.03.2019 by respondent No. 3 to respondent No.1 i.e Director Education NMD Peshawar about report copy with recommendation to this office for further process. Copy attached annexure-*I*
8. In response, Director of Education vide letter No.3513 dated; 20.03.2019 directed the undersigned to proceed as per rules. copy attached. *Annexure -J*
9. Keeping in view facts of the case, by Exercising the Khyber Pakhtun khwa Govt. servants (Efficiency & discipline) rules 2011, Major penalty rules-4(b) i. ;Reduction to a low pay scale ; has been imposed upon Mr. Naeem Akhtar Mali reduced from BPS-03 to BPS -02 and Mr. Alam Zaib Naib Qasid reduced from BPS-04 to BPS-02 with immediate effect. (Copy attached) *annexure-K*

Respondent:


Agency Education Officer
FR Peshawar

OFFICE OF THE HEAD MISTRESS G.G.H.S KHAN ZADA FR PESHAWAR.

NO: 149

DATED: 14/11/17

The Agency Education Officer,
FR Peshawar.

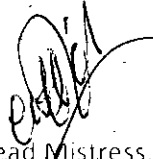
AS per Request of H/W.
A.A.E.O (F)/AL
14/11/2017.

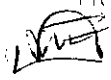
Subject:- Deduction of Salary Primary section.


Memo,

In pursuance of the above noted subject the following has
been found absent of duties from 09/11/2017 to 13/11/2017 despite several
premonitory notice.

1. Jamila Begum, Qalar.
2. Mohammad kasif Chowkidar.
3. Wakeel khan. Beshti.


Head Mistress,
GGHS Khan Zada
FR Peshawar




Agency Education Officer
F.R. Peshawar.



RETIREMENT ON SUPERANNUATION AGE.

Consequent upon attaining the superannuation age (60 years) Mst. Jamila D/O Khan Zada Caller GGHS Khanzada Kill (Primary Portion) FR Peshawar is hereby retired from Government service with effect from 02.04.2017 afternoon with full pension benefit under the existing rules. Her date of birth is 03.04.1957.

Note: Necessary entry to this effect should be made in her service book and other office record.

Agency Education Officer
FR Peshawar

Encl: No 1128-33 dated 18/05/2017

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

1. Additional Accountant General (PR) Sub office Peshawar.
2. Accountant General Khyber Pakhtun khwa Peshawar.
3. Headmistress GGHS Khanzada Killi FR Peshawar.
4. AAO (F) FR Peshawar.
5. LMS Cell.
6. Official concerned.

Agency Education Officer
FR Peshawar



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT:
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145
Email Add: fr_peshawar@yahoo.com

RETIREMENT ON SUPERANNUATION AGE.

Consequent upon attaining the superannuation age (60 years) Mst. Jamila D/O Khan Zada Caller GGHS Khanzada Kill (Primary Portion) FR Peshawar is hereby retired from Government service with effect from 02.04.2017 afternoon with full pension benefit under the existing rules. Her date of birth is 03.04.1957.

Note: Necessary entry to this effect should be made in her service book and other office record.

Agency Education Officer
FR Peshawar

Endst. No. 1128-33 dated. 18/05 /2017

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

1. Additional Accountant General (PR) Sub.office Peshawar.
2. Accountant General Khyber Pakhtun khwa Peshawar.
3. Headmistress GGHS Khanzada Killi FR Peshawar.
4. AAEO(F) FR Peshawar.
5. EMIS Cell.
6. Official concerned.

Agency Education Officer
FR Peshawar

منجانب: ایجنسی ایجوکیشن آفیسر ایف۔ اے۔ ار پشاور

منجانب: مسی رسما: جملیہ کار، محمد کاشف چوکیدار، وکیل ہمیشتی GGPS Khanzada Killi ایف۔ اے۔ ار پشاور

عنوان: جواب طلبی

یادداشت: بحوالہ ہیڈ مسٹریس رپورٹ خط نمبر: 149 مورخہ: 14-11-2017

بحوالہ ہیڈ مسٹریس رپورٹ خط نمبر: 149 مورخہ: 14-11-2017 رپورٹ کے مطابق آپ لوگ بغیر

چھٹی لیے اور پیشگی اجازت یا درخواست کے اپنی ڈیوٹی سے مورخہ 09-11-2017 سے 13-11-2017 تک مکمل غیر حاضر ہے لہذا آپ کو مطلع کیا جاتا ہے۔ مکہ نوٹس ہذا کے ملنے کے فوراً بعد کم از کم 7 دن یا زیادہ سے زیادہ 14 دن کے اندر اندر اپنی ڈیوٹی پر حاضر ہو کر اپنی غیر حاضری کی وجوہات تحریری طور پر زیر دستخطی کو بیان کریں۔

بصورت دیگر آپ کے خلاف ای اینڈ ڈی روز 2011ء تزیلی شق 9 کے تحت قانونی کارروائی جس میں آپ کی سروس سے برخاستگی بھی ہو سکتی ہے۔ عمل میں لائی جائیگی۔

ایجنسی ایجوکیشن آفیسر
ایف۔ اے۔ ار پشاور

2268-71A
مورخہ: 15/11/2017

نقول برائے اطلاع۔

(1) ڈائریکٹر ایجوکیشن فاٹا

(2) اسٹنٹ پولیٹیکل ایجنٹ ایف۔ اے۔ ار پشاور

(3) اسٹنٹ ایجنسی ایجوکیشن آفیسر ایف۔ اے۔ ار پشاور

(4) ہیڈ مسٹریس GGHS Khanzad Killi ایف۔ اے۔ ار پشاور

ایجنسی ایجوکیشن آفیسر
ایف۔ اے۔ ار پشاور

PAYROLL SYSTEM
AMENDMENT - DRM
MULTIPLE EMPLOYEE DATA

11/2017

OFFICE OF THE AGENCY EDUCATION OFFICER FR PESHAWAR

FOR THE MONTH OF 11 /2017 Vendor No.

DDO Code P R 0215 Description

Absentees:-

EMPLOYEE DETAILS			Info Type	GENERAL DATA CHANGE	Wage Type	CHANGE IN PAYMENT/DEDUCTIONS - Amount	Stop Sal. Effective Date	Remarks
EMPLOYEE NUMBER	EMPLOYEE NAME	NIC NUMBER		New Contents		Rupees	Paisa	Adj
00089521	Wakil Khan, Bashli				5801	4827		= D 5 days pay deducted
00556093	Muhammad Kashif Chowdhry				5801	2981		= D - 20

[Signature]
Agency Education Officer
FR Peshawar.

[Signature]
ASST

Prepared By

Audited/Checked By

Entered/Verified By

OFFICE OF THE HEAD MISTRESS G.G.H.S KHAN ZADA FR PESHAWAR.

NO: 151/

Dated: 22/11/17

To

The Director of Education FATA,
Secretariat Peshawar.

Through:- The Agency Education Officer FR Peshawar.

Subject:- Class IV on French leave.

R/Sir,

With due respect, It is stated that I Mehnaz Afridi Head Mistress GGHS Khan Zada Killi FR Peshawar in unison with teaching staff would like to bring Your kind attention to continuous absenteeism of class IV .

Despite my several premonitory notice in order book as well as verbally, They turned deaf ear and termed it as useless . From highly placed sources, it is conformed That a few of them are living abroad .

As a result their lackadaisical attitude in performing duties has adversely effected Educational environment as well as mundane concern of day-to-day life in school.

Therefore, it is requested to look into the matter with serious and earnest Consideration and figure it out as soon as possible .

Thanks .



Head Mistress,
GGHS Khan Zada
FR Peshawar.



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBLR ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

CHARGE SHEET

In the report of Headmistress GGHS Khanzada FR Peshawar and direction of Director Education FATA Peshawar the competent authority under Khyber Pakhtun khwa Government servants (Efficiency and Discipline) Rules, 2011 do hereby charge you.

1. Mr. Naeem Akhtar Mali GGHS Khanzada Killi FR Peshawar.
 2. Mr. Alam Zeb N/Q GGHS Khanzada Killi FR Peshawar.
- i. That you were reported by Headmistress absent from your duty during long period.
 - ii. With profound regret that official matters of the said school were found badly affected.
1. By reason of the above all are guilty of acts of omissions and commission under section (b) & (c) of rules 3 of the said rules and have rendered yourself liable to all and any of the penalties specified in rule 4 of the rules ibid.
 2. Your written defense, if any, should reach the undersigned within 7 days not more than 15 days failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you all.
 3. Statement of allegation described in para 1 at serial No.(a) above.

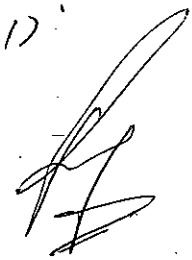
Endst No: 2449-53 Charge file, Dated 07/12/2017.

Copy for information to the

1. Director of Education FATA Peshawar.
2. Assistant Political Agent FR Peshawar.
3. AAEO(F) FR Peshawar.
4. Headmistress GGHS Khanzada with her letter No.dated:
5. Official concerned.

*Agency Education Officer
F.R Peshawar*

*Agency Education Officer
F.R Peshawar*

Further advised
AIC
20/12/17 ✓


To

The Agency Education Officer
FR Peshawar.

Subject: CHARGE SHEET.

Memo:

Kindly refer to your office Endst. No 2449-53 dated 07/12/2017 on the Subject cited above.

It is submitted with due honour that we are class IV employees and belong to respectable Malik family of our area. All of us including ourselves were at stake due to the life threats by terrorsits/miscreants. Being Class IV employees we were not accustomed/wonted with departmental procedure except submission of application to our immediate boss i.e the said Head mistress and we had done so (Photocopies attached).

The question which rises now that why the Head Mistress concerned could not report us earlier either absent or abroad because she used to pay us half of our salaries and half was deducted by her.

Now we are already present and assure your good self that we will never this commit this practice in future.

It is therefore, request that ours reply may please be accepted and no departmental proceeding be initiated against us please.

Dated 20-12-2017

1. Signature

Name Adam Zeb

Designation Naibgasiid

CNIC No. 17301-1277524-5

2. Signature

Name Naeem akhtar

Designation Mali

CNIC 22501-8715058-1

خدمت جناب ہیڈ ماسٹر ایس صاحبہ
سنو رینڈنگ گریلز ہائی سکول
خان دادہ کالے ایف آر بستا اور

جناب عالیہ!

مورد بانہ گزارش ہے کہ میں اس سکول میں بحیثیت کلاس فور
ڈیوٹی سرانجام دے رہا ہوں۔ چند نامعلوم شہریوں کی طرف سے
میرے خاندان کو کچھ کر سے سے دھمکیاں پیغامات موصول ہوا
ہوئے ہیں۔ وہ ہم سے بھتہ طلب کرتے ہیں اور سکول کو

بھوں سے اڑانے کی دھمکیاں دے رہے ہیں۔ ہم اُنہیں بدلے
بھی بھتہ ادا کر چکے ہیں لیکن دھمکیوں کا یہ سلسلہ ختم نہ ہو سکا۔

ان حالات سے مجبور ہو کر میرے بڑے بھائی کو بھی قسٹک چھوڑ
پڑا۔ اب وہی دھمکیاں مجھے دی جا رہی ہے۔ میرے لئے یہاں
رہنا اور ڈیوٹی کرنا ناممکن ہے۔

برائے سپرمائی فرما کر مجھے کچھ کر کے سہلے یہاں سے
دور رہنے کی اجازت دی جائے۔ میں آپ کا احسان مند رہوں گا۔

العارض

آپ کا مہربان سردار

N. H. S.

نصیر احمد

محرمت جناب سید مسٹر بسین مہاراجہ
گورنمنٹ ٹرنز ہائی سکول
خان زادہ گل ایف آریشاور

جناب عالیہ

مذربانہ التماس ہے کہ گزشتہ کچھ عرصے سے مجھے شریسرور
اور دہشت گردوں کی جانب سے دھمکیاں موصول ہو رہی ہیں۔ وہ
مجھے سکول کو بھون سے اڑانے کی دھمکیاں دیتے ہیں اور مجھے چھان لیتے
مارنے کی دھمکیاں دیتے ہیں۔ وہ بروقت ہتھ طلب کرتے ہیں اور ادا
نہ کرنے پر سنگین نتائج کی دھمکیاں دیتے ہیں۔ بار بار یہی بات کرتے ہیں
کہ مرد سیکورٹی کے سکول میں تمہارا کیا کام ہے؟ حالانکہ ہم
ان کو ایک دفعہ ہتھ اڑا کر بھی چلے ہیں لیکن پھر بھی وہ بار بار یہی
مطالبہ دہراتے ہیں۔ جناب عالیہ! ان لوگوں کے سیکورٹی کے مسائل
ہیں چلتا۔ میرے لیے ان حالات میں یہاں ڈیوٹی کرنا بہت مشکل ہے
اور یہاں رہنا بھی خطرے سے خالی نہیں ہے۔ اسی لیے میں کچھ عرصے
کا لیے یہاں سے باہر جانا چاہتا ہوں۔ لہذا آپ سے گزارش ہے کہ مجھے کچھ عرصے کے لیے باہر
جانے کی اجازت دی جائے۔ میں آپ کا بہت مشکور سیزرہ

الغرض

آپ کا فرما لیردار

عالم زیب
ٹائٹ واٹر

عالم زیب

Alam Zeb



OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT:
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145
No. 3000 Dated. 19/12 2018

To

The Director Education,
FATA Peshawar.

Subject:- COMPLAINT
Memo:-

Kindly refer to your office letter No. 2374 dated: 12.02.2018 on the subject cited above,

It is submitted that the low grade employees of GGHS Khanzada FR Peshawar were reported as absent by the then Headmistress of the said School with letter NO. 149 dated: 14.11.2017 with subject "Deduction of salary (Primary Section)". Consequently this office served show cause No. 2267-A on 15.11.2017. The salary of class-iv naming Mr. Muhammad Kashif chowk and Mr. Wakeel Khan Behishti were deducted as per report 5-days each (Copy attached). Consequently they given charge sheet vide No. 2449-53 dated: 07.02.2017 and moreover all class-iv were called to Agency Education office for physical verification on 29.11.2017 vide No. 2342 dated 27.11.2017. All of them attended the office of the undersigned and they were physically checked and verified.

In response to the charge sheet, they conveyed that they were absent owing to the growing stake/threat of terrorism as they belong to prominent Malik family of the region.

In such circumstance they had properly submitted application asking for Departmental permission to the then Headmistress but she has not processed that permission due to taking half pay from us, as per their written statement. (Photocopy attached).

Subsequently the undersigned submitted a letter along with their replies vide letter No. 2764 dated 24.01.2018. therein asking for further necessary action.

Further the photocopies of the class-iv attendance register are concerned, previously it was not maintained in the school despite of the direction of AEO vide dated: 10.12.2016 (Saturday) to the then Headmistress, now it is being maintained since November, 2017. Now, all the class-iv employees are present and have been physically verified.

Forgoing in view, it is requested that what kind of penalty/proceeding may be initiated in the instant case as she was herself the then DDO/Headmistress of the said school.


Agency Education Officer
FR Peshawar



OFFICE OF THE
District Education Officer
Hassan Khel Sub Division Peshawar
BLOCK: 8 NEAR INFORMATION DEPTT:
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

No. 6738 Dated 08.03.2019


To

**The Director Education
Newly Merged Tribal Distt: KP Peshawar.**

**Subject:- PROVISION OF REPORT REGARDING CLASS-IV OF GGHS KHANZADA
KILLI HSD PESHAWAR.**

Memo:-

Reference letter No. 3000 dated; 19.02.2018 regarding subject cited above, a report copy needed with recommendation to this office for further process.


**District Education officer
Hassan Khel Sub Division
Peshawar (Ex-FR)**



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,

9210437, 9210957, 9210468

Fax 091-9210936

To

No-4513 20/3/19

✓ The District Education Officer-

Sub: Division Hassan Khel District Peshawar

Subject: PROVISION OF REPORT REGARDING CLASS IV OF GGHS
KHANZADA KILLI HSD PESHAWAR

Memo:

I am directed to refer to your office letter No-6738 Dated-08-03-2019 on the subject cited above and to ask you that being a competent authority and well aware about the nature of the instant case, proceed into the matter as per existing rules and policy.

Amir 9/1/19
Deputy Director (F/A)
Merged Districts

Endst: No. _____ /File E-4 kohat

Dated _____ /2019

Copy to the:-

1. PA to Director E&S Education Khyber Pakhtunkhwa Peshawar.

Deputy Director (F/A)
Merged Districts



OFFICE OF THE
District Education Officer
Hassan khel Sub Division Peshawar
BLOCK: 8 NEAR INFORMATION DEPTT.
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

NOTIFICATION:

1. **WHERE AS:** the Headmistress of GGHS Khan Zada Killi Hassan Khel Sub Division Peshawar (Ex-FR Peshawar) reported vide No. 151 dated: 22.11.2017, that Mr. Naeem Akhtar Mali of GGHS Khanzada Killi has been absent.
2. **AND WHERE AS:** you were charge sheeted by the under signed vide No. 2449-53 dated: 07.12.2017.
3. **AND WHERE AS:** you submitted your reply on 20.12.2017.
4. **AND WHERE AS:** the under signed submitted report along with your reply vide No. 2555 dated: 21.12.2017 to the director of Education in NMD Erstwhile FATA asking for further necessary action.
5. **AND WHERE AS** recommendation of the Director Education NMD Erstwhile FATA received vide letter NO. 4513 Dated: 20.03.2019.
6. **NOW THEREFORE: (I)** In Exercise of the powers conferred Rules-4(b)-i of Khyber Pakhtunkhwa Government Servants (Efficiency & discipline) rules 2011, the competent Authority is pleased to imposed major penalty of "Reduction to low pay scale" upon Mr. Naeem Akhtar Mali of GGHS Khanzada Killi Hassan khel sub Division Peshawar to reduced for BPS-03 to BPS-2 with immediate effect. (Copy attached)

**District Education Officer
Hassan khel Sub Division
Peshawar.**

Endst; No. 6236-49 Dated: 21/3/2019
Copy to the:

1. Additional Accountant General PR sub Office Peshawar.
2. Director Education NMTD Peshawar.
3. Assistant Commissioner HSD Peshawar.
4. Headmistress GGHS Khanzada Killi HSD Peshawar.
5. ADEO (M/F) HSD Peshawar.
6. Officials concerned.

**District Education Officer
Hassan khel Sub Division
Peshawar.**


NOTIFICATION:


1. **WHERE AS:** the Headmistress of GGHS Khan Zada Killi Hassan Khel Sub Division Peshawar (Ex-FR Peshawar) reported vide No. 151 dated: 22.11.2017, that Mr. Alam Zaib Naib Qasid of GGHS Khanzada Killi has been absent.
2. **AND WHERE AS:** you were charge sheeted by the under signed vide No. 2449-53 dated: 07.12.2017.
3. **AND WHERE AS:** you submitted your reply on 20.12.2017.
4. **AND WHERE AS:** the under signed submitted report along with your reply vide No. 2555 dated: 21.12.2017 to the director of Education in NMD Erstwhile FATA asking for further necessary action.
5. **AND WHERE AS** recommendation of the Director Education NMD Erstwhile FATA received vide letter NO. 4513 Dated: 20.03.2019.
6. **NOW THEREFORE: (I)** In Exercise of the powers conferred Rules-4(b)-i of Khyber Pakhtunkhwa Government Servants (Efficiency & discipline) rules 2011, the competent Authority is pleased to imposed major penalty of " Reduction to low pay scale" upon Mr. Alam Zaib Naib Qasid of GGHS Khanzada Killi Hassan khel sub Division Peshawar to reduced for BPS-04 to BPS-2 with immediate effect.(Copy attached)

Endst; No. 6830-35 Dated: 21/03 2019

Copy to the:

1. Additional Accountant General PR sub Office Peshawar.
2. Director Education NMTD Peshawar.
3. Assistant Commissioner HSD Peshawar.
4. Headmistress GGHS Khanzada Killi HSD Peshawar.
5. ADEO (M/F) HSD Peshawar.
6. Officials concerned.


District Education Officer
Hassan khel Sub Division
Peshawar.


District Education Officer
Hassan khel Sub Division
Peshawar.