None for the appellant present. Due to general strike of the bar, the case is adjourned. Case to come up for further proceedings on 06.05.2019 before S.B.

(Ahmad Hassan) Member

06.05.2019

Appellant in person present and requested for adjournment on the ground that his counsel is not available today. Adjourned to 21:06:2019 for preliminary hearing before S.B.

(MUHAMMAD AMIN KHAN KUNDI) MEMBER

21.06.2019

Appellant in person present and requested for adjournment on the ground that his counsel is ill today and cannot attend the Tribunal today. Adjourned to 06.08.2019 for preliminary hearing before S.B.

(Muhammad Amin Khan Kundi) Member

06.08.2019

Nemo for the appellant.

It is already past 3:45PM and despite repeated calls no one is in attendance on behalf of the appellant.

Dismissed for non-prosecution. File be consigned to the record room.

Announced: 06.08.2019

Chairman

#### Form- A

#### FORM OF ORDER SHEET

Court of		l
		1
Case No	1460 <b>/2018</b>	

	Case No	1460/2018
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/12/2018	The appeal of Mr. Rehman-ud-Din presented today by Mr. Irfan Ali Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-	07/12/2018.	This case is entrusted to S. Bench for preliminary hearing to be put up there on
	08.1.2019	Nemo for appellant.
	•	Notices be issued to appellant/counsel for
		19.02.2019 for preliminary hearing before S.B.  Chairman
. 1	9.02.2019	Appellant absent. Learned counsel for the appellant absen
	A	djourn. To come up for preliminary hearing on 04.04.2019 before.  B.  Member
,		

## BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1460 /2018		
Rehman-Ud-Din	Appellant	
VERSUS		
IGP Prisons KPK & others	Respondents	

#### INDEX

S.	Description of Documents	Annex	Pages
No			
1.	Grounds of service appeal & affidavit	*	1-7
2.	Copy of the service card	A	8-11
3.	Copy of the FIR & death certificate	В	12-13
4.	Copy of the show cause notice	С	14
5.	Copy of Reply to the Show Cause	D	15 ·
	Notice		
6.	Copy of Impugned order	E	16
7.	Copy of Representation/ Departmental	F	17-18
	Appeal along with order		
8.	Addresses of Parties		19
9.	Wakalat Nama		20

Appellant

Through

Date: 27/11/2018

Irfan Ali Yousafzai Advocate, High Court

Peshawar

# BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR Khyber P

AKHI UNKHWA, PESHAWAR Service Tribunal

THE KHYBER

Service Appeal No. 1460 /2018

Diary No. 1726

Mr. Rehman-Ud-Din Ex-Constable Prisons Department Khyber

Pakhtunkhwa, Peshawar

S/o Muhammad Israr

#### VERSUS

- 1. Inspector General Prisons Khyber Pakhtunkhwa, Peshawar
- 2. Superintendent Central Prisons, Peshawar.

APPEAL U/S 4 OF

3. Accountant General, Khyber Pakhtunkhwa, Peshawar.

RESPONDENTS

Fledto-day
Registrar

PAKHTUNKHWA SERVICE TRIBUNAL ACT,

1974 TO AFFECT THAT RESPONDENT NO. 2

MAJOR PENALTY OF "COMPULSORY
RETIREMENT" FROM SERVICE UPON THE
APPELLANT VIDE THE IMPUGNED ORDER
NO. 2522/P.B DATED 31-08-2017 IS

AGAINST THE LAW AND RULES ON THE
SUBJECT HENCE THE IMPUGNED ORDER
DATED 31-08-2017 IS LIABLE TO BE SET
ASIDE AND THE APPELLANT MAY KINDLY BE
REINSTATED WITH ALL BACK BENEFITS
INCLUDING HIS SENIORITY.

#### **Prayer in Appeal:**

On acceptance of this service appeal, the impugned order No. 2522/P.B dated 31-08-2017, passed by respondent No. 2 may kindly be set aside and the appellant may please be reinstated in service with all back benefits including his seniority.

#### **Respectfully Sheweth:**

Brief facts giving rise to the appeal are as under:

- 1. That the appellant was appointed as constable in the Prisons Department, and he was performing his duty regularly to the entire satisfaction of his superior. (Copy of the service card is attached as Annexure-A)
- 2. That the Appellant is the only source of income to his family and his brother namely Nasir Khan who was performing his duty as a constable in the Counter Terrism Department (Police Department) was martyred by the militance on 26/02/2016. (Copy of the FIR & death certificate are attached as Annexure-B)
- 3. That thereafter a FIR was registered against the unknown militance/accused as a result the facilitators of the militant were arrested by the law enforcing agencies and were confined in central prisons Peshawar in the year 2017.

- 4. That due to the arrest of the facilitator of the militant all the family members including the appellant were received savior threats and the appellant family were pressurized to withdraw the case and threating them for savior consequences, if they did not withdraw their case.
- 5. That in these circumstances, the appellant was shocked to received a show cause notice No. 2490-92 dated 28-08-2016 regarding his 6 days absence. (Copy of the show cause notice is attached as Annexure-C)
- 6. That the appellant submitted written reply to the said Show Cause Notice wherein the appellant denied/ refused the so-called allegation leveled in the Show Cause against the Appellant vide reply to the Show Cause Notice dated 30/08/2017 within the time mentioned therein. Moreover the Appellant properly explain his position in the said reply. (Copy of Reply to the Show Cause Notice is attached as Annexure-D)
- 7. That to the extreme shock and dismay of the appellant Respondent No. 2 has issued an Order No. 2522/P.B Dated 31/08/2017 wherein major penalty was awarded to the Appellant by COMPULSORY RETIREMENT the Appellant from service. (Copy of Impugned order is attached as Annexure-E).
- 8. That feeling aggrieved from impugned Order No. 2522/P.B Dated 31/08/2017 the Appellant filed

(h)

Departmental Representation to the competent authority, which was regretted. (Copy of Representation/ Departmental Appeal along with order is attached as Annexure-F).

9. That feeling aggrieved from above referred order of respondent No. 2, the appellant assails these order before this Honorable Tribunal, inter alia, on the following grounds:

#### **GROUNDS**:

- A. That the impugned order dated 31/08/2017 of respondent No.2, is against law, facts and record of the case, hence liable to be set aside.
- B. That the impugned order dated 31/08/2017 was issued due to mis-reading and non-reading regarding the problem which the appellant face.
- C. That the absence, which has been committed by the Appellant was not willful, and the respondent were in the knowledge regarding accident which is on record, moreover the Applicant never willfully absented himself from the duty but due to unavoidable circumstances.
- D. That the respondent No. 2 issued the said order without giving opportunity of personal hearing to the Appellant. It is well settled principle of law that no one can be condemn unheard, hence the

(5)

impugned order is not maintainable in the eyes of law.

- E. That the respondent No 2 ignored the entire facts, record, circumstances before issuance of impugned order in respect of Appellant violated the E&D Rules and malafidely issued the said impugned Order to deprive the appellant in his depended from his legal right.
- F. That the major penalty has been imposed upon the appellant by respondent No. 2 by compulsory retirement from service is illegally without holding regular independent inquiry, which was prerequisite for imposing such penalty, so, non-holding of regular inquiry is against law, procedure and canons of principles of administration of justice.
- G. That the impugned order dated 31/08/2017 passed by respondent No.2 in a slipshod manner and is based on assumptions & presumptions, arbitrary and is not sustainable in the eyes of law.
- H. That appellant has not been provided an opportunity to explain his position with regarded to the charges leveled against him during the inquiry proceedings, so, he was condemned unheard.
- I. That impugned order is arbitrary, capricious and not maintainable and is the result of misreading and non-reading evidence, hence liable to be set aside.



- J. That appellant belongs to a poor family, low-scale employee, jobless since his compulsory retirement from service and is sole bread-earner of his entire family. He is not engaged in any profitable activity for earning butter & bread, so, his removal from service, in such circumstances, is against the rights of fundamental enshrined in Constitution of Islamic Republic of Pakistan, 1973.
- K. That any other ground may be adduced during the course of arguments, with the kind permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal, the impugned order dated 31/08/2017, passed by respondent No. 2 may kindly be set aside and the appellant may please be reinstated in service with all back benefits including his seniority.

#### **AND**

Any other relief which may be deemed proper in circumstances of the case may also be granted in favor of the appellant.

Through

Irfan Ali Yousafzai

Advocate, High Court

Appellant C

Peshawar

Cell# 0314-9070658

Date: 27/11/2018

(3)

# BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No/2018	
Rehman-Ud-Din	Appellant
VERSUS	
IGP Prisons KPK & others	Respondents

#### **AFFIDAVIT**

I, Mr. Rehman-Ud-Din Ex-Constable Prisons Department Khyber Pakhtunkhwa, Peshawar S/o Muhammad Israr R/o Shaheen Muslim Town, Mohallah Qayum Abad No.4 Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

NOTARY PUBLIC

MAWAR HIGH

DEPONENT

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7	المراجع المراجع والمراجع	
	له دهره سل سان فراتب و مساله من احتجام المرمي فروسروان و لوغرين خان المردد المراز المراز المراز المردد الم	أمر افنات
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1	ووها ومراز المستحد والمراز وال	التبيد فالرس الما
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<b>,</b>	نائلی ا دردسینت فردی کا بیج - مین ما معوم دخرف مدننت فردیت فلیف دعد او المان در این ماند. در از ایم مید به خواد ولدموامراه طان او ایرون از مدندت فردیت فلیف دعد او المان	عدا كارتك
	ئے۔ المشیر میں خشاد ولد فیامرار عاق کر بھار سال نے دمید ہوجا ہوں؟ شکل وعوام ارمیوں عملی ا رو درنہ برعن درنے دان ہر درئیے حکرمہ کا نہیں کا ہز زہر ہاں گور در تلا نقید کا المام کا دحال الماری الماری الم نے "ما کنند جنہ بر دنجار روم ہوئے نے مرمزی کی ہے۔ مغون دور در سے جرد تعذی کیا۔ حکرمی الدیری	ماهری ن جد وست کندر راید
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Ì	المادي معمر مرادع في روا مهم في مرا من من المادي المادي الماديد والموسي المورد والموسي المورد والموسي المورد و وه- ٢٠٠٥ و در المساسر وي مرون در محالا مخر العمل مرجوع من مم العمل منزل مرامد عمر المورد والمعرف المرامد عمر المورد والمورد والمورد المرامد والمعرف المرامد والمورد وا	معنفهاه
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الازام إستامة المارية 377 المكال اطالى ريودك فرن مر ود المواج ودو ابتدال الاكافيت يراول ساعاد كالمحرسة والمعادة المعدن بلا بدارى 2.2 معلتنا به 2.70 Ed/ 50 cm 50. 113 25 27 05/13 per 13:30 craff بالمأاقة يناده ونت كهارام إيراك والماري المارية ازارد وباسف لاكونيائيد 22.32-34-48-533 استروا والتعالم والمتعانية والمتعانية المتعانية المتعاني וושליניון. عساوتين كمتلكا فالمعاصة كمنا تداف معدم بالمارين المستارين الما はこれがかれるかっ

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#### DEPARTMENT OF FORENSIC MEDICINE, KHYBER MEDICAL COLLEGE, PESHAWAR.

NO. 130 /FM/KMC.

.DATED. 03/3 /12018

#### DEATH CERTIFICATE.

Name of Deceased.	Nasir Khan
Father/Husband Name.	Mechaninad Icyan
Age	28-32 Years Sex. Male.
Autopsy Number.	105/KMC/2016 Date. 07/02/2016
Brought by	Siraful Amen 5250
Identified by:	Mian Sana ullak.
	Baseer Michammad
Police Station.	CTD Peshawar.

#### Cause of Death

Disease or condition directly leading to death.

Antetellenl Eduses.

Other sightheam conditions contributing to the death.

The deceased dicel due to injury to the Brain due to firea

Alkan



HEAD,

DEPARTMENT OF FORENSIC MEDICINE

KHYBER MEDICAL COLLEGE, PESHAWAR.

DEPARTMENT OF FORENSIC MEDICENE KHYBER MEDICAL COLLEGE, PESHAWAR.



## SHOW CAUSE NOTICE UNDER RULE-5 (1) READ WITH RULE-7 OF THE KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY & DISCIPLINE) RULES, 2011.

You, Warder (BPS-05) Rahmanud Din attached to Central Prison Peshawar absented yourself from your allotted duties as well as jail premises without prior permission of the Competent Authority on 21-08-2017 (AN) and reported back on 28-08-2017 (FN) after 06 days willful absence, which constitutes gross misconduct.

I, Masud-ur-Rahman, Superintendent Headquarters Prison Peshawar as Competent Authority, am satisfied by the report received through the Superintendent Central Prison Peshawar and there is no need of holding any further inquiry.

Now therefore, you above named Warder (BPS-05) are hereby called to show cause within 07 days of the receipt of this notice as to why you should not be dismissed from service for above stated act of misconduct.

In case your reply does not reach this office within stipulated period, ex-parte action shall be taken against you.

SUPERINTENDENT HEADQUARTERS PRISON PESHAWAR

Endorsement No: 3/90-J2/- Dated: 3/108/2017

Copy of the above is forwarded to the: -

Annear

1- Inspector General of Prisons Khyber Pakhtunkhwa Peshawar please.

2- Superintendent Central Prison Peshawar with reference to his report dated 28-08-2017.

3- Warder Rahmand Din C/o Superintendent Central Prison Peshawar.

SUPERINTENDENT HEADQUARTERS PRISON PESHAWAR

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# SUPERINTENDENT HEADQUARTERS PRISON PESHAWAR No. 2522/P.B/DT:3//08/2017

#### ORDER

WHEREAS, the accused Warder (BPS-05) Rahman-ud-Din attached to Central Prison Peshawar was proceeded against under Rule(5)(1) Read with Rule-7 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of his misconduct as mentioned in Show-Cause Notice served upon him vide this Headquarters endorsement No. 2490-92 dated 28-08-2017.

AND WHEREAS, the accused Warder absented himself from his allotted duties as well as jail premises without prior permission of the Competent Authority on 21-08-2017 (AN) and reported back on 28-08-2017 (FN) after 06 days willful absence.

AND WHEREAS, the accused Warder submitted reply to the Show-Cause Notice on 30-08-2017, which was found unsatisfactory.

**AND WHEREAS**, the accused Warder was afforded the opportunity of personal hearing on 31-08-2017 but he could not narrate any plausible reason for his willful absence.

NOW THEREFORE, in exercise of powers conferred under Rule-14(5) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 having considered the charges leveled against him in light of evidence and record, the undersigned being Competent Authority orders that the accused Warder is hereby awarded the penalty of "Compulsory Retirement from Service" with immediate effect.

SUPÉRINTENDENT

HEADQUARTERS PRISON PESHAWAR

Endorsement No: 2523-2/-

Copy of the above is forwarded to the: -

1- Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar please.

2- Superintendent Central Prison Peshawar with reference to his report dated 28-08-2017.

3- Accountant General, Khyber Pakhtunkhwa Peshawar.

4- Head Clerk (Pay Branch) Central Prison Peshawar

5- Official concerned.

SUPERINTENDENT

HEADQUARTER PRISON PESHAWAR

MOTESTED

Annexus F' (17)

The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.

Subject: -

### APPEAL FOR RESTORATION INTO SERVICE AGAINST THE JUDGEMENT OF SUPERINTENDENT HEADQUARTERS PRISON PESHAWAR

R/Sir,

With reverently submitted that I have been compulsory retired from service by the Superintendent Headquarters Prison Peshawar vide Order No.2522/PB dated 31-08-2017 (Copy enclosed). In this connection a show cause was issued to me by the Superintendent Headquarters Prison Peshawar vide No.2490-92 dated 28-08-2017 (Copy enclosed) and accordingly I submitted my reply to the Show Cause Notice on 30-08-2017 (Copy enclosed). R/Sir,

- 1) My brother namely Mr. Nasir Khan, who was a constable in Counter Terrorism Department (Police Department) was martyred by the militants on 06-02-2016 (Copy of Department of Forensic Medicine Khyber Medical College Peshawar and Service Certificate issued by CTD Police Department are enclosed for perusal).
- 2) That my brother was martyred by the militants and a FIR was registered against unknown militants as a result the facilitators of the militants were arrested by the Law Enforcement Agencies and were confined in Central Prison Peshawar in the year 2017.
- 3) That due to arrest of the facilitators of the militants, my family including me were receiving severe threats and several time we were pressurized for withdrawal of case and threatening for murdering my family members including me.
- 4) That the trial of these militants were in ATC Court Peshawar and the militants have repeatedly threatening to our family for withdrawal the case from ATC Court.
- 5) That due to my absence from duty, I was compulsory retired by the Superintendent Headquarters Prison Peshawar Order No.2522/PB dated 31-08-2017.
- 6) That due to these reasons explained above, I was nor in position to file a departmental appeal before the appellant authority neither I was able to continue my service in such threatening environment and my family also faced financial constraints, pension, gratuity and other retirement benefits were granted to my family / me.
- 7) Now, the security environment of the country have been normal and my family have also not receiving any severe threats, I desire to re-join the service.

It is therefore, humbly requested to kindly restore my service and I will deposit all back benefit that I have received so far into government exchequer. All relevant documents are attached for kind perusal.

I shall be highly obliged of your this kindness please.

Yours Obediently

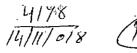
RAHMAN-UD-DIN ) Ex-Warder

Prisons Department Khyber Pakhtunkhwa

Dated 01-11-2018

B)-11-2018





#### OFFICE OF THE INSPECTOR GENERAL OF PRISONS KHYBER PAKHTUNKHWA PESHAWAR

**23** 091-9210334, 9210406

091-9213445

www.facebook.com/kpkprisons/

G<sub>mail</sub> <u>prisonsig@gmail.com</u>
No.\_\_\_\_\_33952

Dated 14-11-2018

To,

Mr. Rahman-Ud-Din (Ex-warder),

C/O Superintendent

Central Prison Peshawar.

Subject:-

APPEAL FOR RESTORATION INTO SERVICE AGAINST THE JUDGEMENT OF SUPERINTENDENT HEADQUARTERS PRISON

PESHAWAR.

Memo;

I am directed to refer to your application dated 01-11-2018 on the subject and to

convey that your request has been considered and regretted by the competent authority, being time

barred.

ASSISTANT DIRECTOR (ADMN)
FOR INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

DS. P.B.
For WA

SUPULO 18

ATTESTED

#### SERVICE CERTIFICATE

It is certified that Mr. Nasir Khan s/o Muhammad Israr r/o District Peshawar bearing CNIC No 17301-3808808-1 remained a permanent Government employee in Police Department served in the Capacity of Constable belt No 347 in this Unit and embraced "SHAHADAT" on 06.02.2016.

. . .

For Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa,

Peshawar.

Superintendent of Police MQRS

CTO Khviser Pokhtankhwa.

Feshawar -

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# BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No	/2018
Rehman-Ud-Din	Appellant
	RSUS
•	Respondents
	respondents
, ADDDDGG-	
ADDRESSES	S OF PARTIES
APPELLANT	•
Mr. Rehman-Ud-Din Ex-Consta Pakhtunkhwa, Peshawar R/o Sl Qayum Abad No.4 Peshawar	able Prisons Department Khyber haheen Muslim Town, Mohallah
RESPONDENTS	•
•	
I. Inspector General Pri Peshawar	sons Khyber Pakhtunkhwa,
2. Superintendent Central	Prisons, Peshawar.
3. Accountant General, Khy	yber Pakhtunkhwa, Peshawar.
·	
Through	Appellant
Tinough	Pali ganeli.
	Irfan Ali Yousafzai

Advocate, High Court
Peshawar

Date: 27/11/2018

سياد الالالماءاك لايداك سايقالومايانك الأوادة والمتفارث بالمتساسات الماءالالا كالماية وجواله المنجابة المنابعة المنابعة المناهدة المناهدة المنابعة المناب مالمنسمة مسامين المراكة المناية الاخساران بالمالية المالية الحسارة المنابة いいりょいでは、ころとはいるとないこのとうれんとうとしまれていましていんしいいか المساد كاكر المامادر مولي المرايد الرق ولا ولا الادرنواس الم كالقريل والراب المعادية والمعادية يذراني الالالأاء الالالأاء الالكوكر المتعمل المعارب المراج والإلاا كالمرابة किया क्रिक्ट के रिया मार प्राप्ट क्रि عدر المالالماليان المالي المناف ي المناف المناف المناف المنافع الركي المركية ier mem sinos se mos.

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كالمري كرك للمديب لم لكركم بمراحد لي بدون الماري المنافرة

ما داخيد مناولة الما المارود عن المعالمة المعالم المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة