

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR CAMP COURT ABBOTTABAD.**

BEFORE: **KALIM ARSHAD KHAN ... CHAIRMAN**  
**FAREEHA PAUL ... MEMBER (Executive)**

*Service Appeal No.5911/2021*

**Shehla Naz, C.T Government Girls High School Kothiala Abbottabad.**  
.....(**Appellant**)

Versus

1. **Secretary Elementary and Secondary Education, Peshawar.**
  2. **Director Admin Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.**
  3. **District Education Officer (Female) Abbottabad.**
- .....(**Respondents**)

Present:

Mr. Muhammad Arshad Khan Tanoli,  
Advocate.....For appellant.

Muhammad Jan,  
District Attorney.....For official respondents.

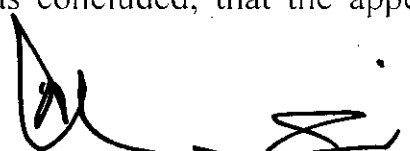
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Date of Institution.....23.02.2021  
Dates of Hearing.....21.09.2022  
Date of Decision.....21.09.2022

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT WAS TRANSFERRED FROM GOVT: GIRLS HIGH SCHOOL BAGNOTAR TO GOVT: GIRLS HIGH SCHOOL SHALIMAR TOWN LAHORE ON DEPUTATION UNDER THE WEDLOCK POLICY VIDE ORDER NO. 3695/A DATED 07.04.2009 AND SHE WAS POSTED AT GOVT: GIRLS HIGHER SECONDARY SCHOOL KOTHIALA ABBOTTABAD VIDE ORDER DATED 25.06.2018 BUT THE BORROWING EDUCATION DEPARTMENT AT PUNJAB DID NOT RELIEVE THE PETITIONER FROM DUTY, AS A RESULT, THE PETITIONER HAS BEEN REMOVED FROM SERVICE VIDE IMPUGNED ORDER ENDORSEMENT NO. 9315-23 DATED 05.11.2019. THE GOVT: OF THE PUJAB EDUCATION DEPARTMENT RELIEVED THE PETITIONER ON 03.02.2020 THEREFORE, THE PETITIONER FILED DEPARTMENTAL APPEAL ON**

**DATED 11.02.2020 AGAINST THE DEPARTMENT. RESPONDENT NO.2 DIRECTED TO CONDUCT PROPER INQUIRY IN CASE OF THE APPELLANT AND THE INQUIRY OFFICER DIRECTED THAT THE PETITIONER REMAINED ABSENT FROM DUTY AND THE APPELLANT RECEIVED THE INQUIRY REPORT ON 25.01.2021. HENCE, IMPUGNED REMOVAL FROM SERVICE ORDER DATED 05.11.2019 AND INQUIRY REPORT DATED 31.12.2020 ARE ILLEGAL AGAINST THE LAW AND THE SAME IS LIABLE TO BE SET ASIDE.**

**JUDGMENT**

**KALIM ARSHAD KHAN CHAIRMAN.:** The facts surrounding the appeal are that the appellant was appointed as C.T Teacher on 06.11.1994 and served had in different schools of District Abbottabad; that the appellant was posted from Govt: Girls High School, Bagnetar, Abbottabad to Govt: Girls High School, Shalimar Town, Lahore on deputation under the wedlock policy; that the appellant took over the charge of the post at Lahore on 21.04.2009; that the appellant time and again applied for extension of her deputation period and lastly, she was transferred in Govt. Girls Secondary School Kothila vide order dated 25.06.2018; that the Government of Punjab Education Department did not relieve the appellant from duty as the appellant was willing to report to her parent department but she was relieved by the Punjab government on 03.02.2020; that the appellant started shuttling in the respondents offices on her repatriation from the Punjab government with effect from 03.02.2020 and lastly came to know that she had been removed from service vide impugned order dated 05.11.2019; that she filed departmental appeal on 03.11.2020; that on departmental appeal an enquiry was conducted which was concluded; that the appellant then filed this appeal on 23.02.2021.

  
21.09.22

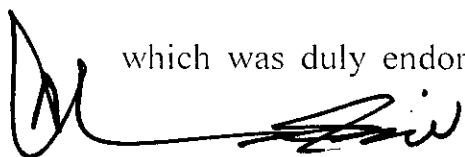
2. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who, on putting appearance, contested the appeal by filing written reply raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.

3. We have heard learned counsel for the appellant and learned District Attorney for the respondents.

4. The learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned District Attorney controverted the same by supporting the impugned order.

5. The record reflects that the appellant had gone to Punjab on deputation for a period of three years w.e.f 07.04.2009 to 07.04.2012. Admittedly her deputation period was never extended by her parent department nor is there anything on the file to lead us to hold that any effort was made by the appellant or any exercise was undertaken by the department to extend the deputation period of the appellant. Being a civil servant it was incumbent upon the appellant to have reported back to the parent department soon after expiry of the deputation period but she did not. It appears from the record that the department had issued various letters for her return but she did not. The department initiated disciplinary proceedings against the appellant which culminated into the impugned order of her removal from service on 05.11.2019 copy of

which was duly endorsed to her and the same was annexed with the

  
21.09.22

appeal by the appellant herself as annexure-F which shows that the same was communicated to the appellant but even then she filed departmental appeal with a considerable delay on 27.08.2020 which is found placed on appeal as annexure-G, page-19. Whereas in paragraph-7 of her appeal she alleges that she had come to know about her removal from service on 20.10.2020 and filed departmental appeal on 03.11.2020. The appeal of 03.11.2020 is also found placed on file as annexure-G, page-19-A. This shows and proves that the appellant has not stated the facts in a truthful manner, therefore, her departmental appeal is barred by limitation rendering this appeal not maintainable. Even otherwise on merits too there is no ground nor is there any application with the appellant to convince the Tribunal about her remaining out of the province for many years after expiry of her period of deputation.

6. This being so, the instant appeal has no merits and is dismissed. Costs shall follow the event. Consign.

7. *Pronounced in open Court at Abbottabad and given under our hands and the seal of the Tribunal on this 21<sup>st</sup> day of September, 2022.*



**KALIM ARSHAD KHAN**  
Chairman  
Camp court Abbottabad



**FAREEHA PAUL**  
Member (Executive)  
Camp court Abbottabad

**ORDER**

21<sup>st</sup> Sept 2022

1. Counsel for the appellant present. Mr. Muhammad Jan, District Attorney for respondents present.
2. Vide our detailed judgment of today, separately placed on file, this appeal has no merits and is dismissed. Costs shall follow the event. Consign.
3. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 21<sup>st</sup> day of Sept, 2022.*



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

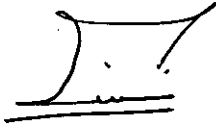


(Fareeha Paul)  
Member(E)  
Camp Court Abbottabad

20<sup>th</sup> July, 2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 21.09.2022 before the D.B at Camp Court Abbottabad.



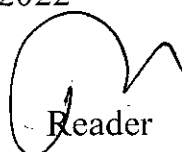
(Salah-ud-Din)  
Member (J)



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

14.03.2022


Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 17.05.2022

  
Reader

17.05 2022

Counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Hamid Mansoor. Assistant for the respondents present.

Written reply/comments on behalf of respondents submitted which is placed on file. A copy of the same is handed over to the learned counsel for the appellant. To come up for rejoinder as well as arguments on 16.06.2022 before D.B at camp court Abbottabad.


  
(Fareeha Paul)  
Member (E)  
Camp Court Abbottabad

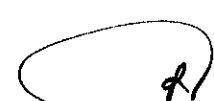
16.06.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

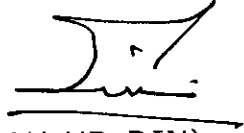
Former made a request for adjournment in order to prepare the brief of the case. Case is adjourned. To come up for arguments on 20.07.2022 before D.B at Camp Court, Abbottabad.

  
(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

11.10.2021

Clerk of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is unable to appear before the Tribunal today due to strike of lawyers. Adjourned. To come up for preliminary hearing before the S.B on 28.12.2021 at Camp Court Abbottabad.



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

28.12.2021

present in person. Preliminary arguments have been heard.

15/03/22

The appellant has impugned the order dated 05.11.2019 of her removal from service on the ground of wilful absence. It is mentioned in the impugned order among other reasons that the appellant was served with show cause notice through Director, E&SE Peshawar at her school addressed vide No. 658 dated 19.09.2019 and was finally served through publication of notices in daily Newspapers Nawa-e-Hazara and Sarhad News dated 28.06.2019. The appellant has also annexed copy of the relieving order issued by the school Education Department of the Government of Punjab, whereby she being deputationist from Khyber Pakhtunkhwa was relived with immediate effect on 03.02.2020 apparently after passing of the impugned order. To settle the said controversy, regular hearing of appeal is necessary. This appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 14.03.2022 before S.B at camp court, Abbottabad.

Appellant Deposited  
Security & Process Fee

04/01/22



Chairman  
Camp Court, A/Abad

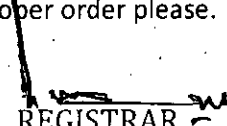




Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 5911 /2021


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1-    | 08/06/2021                | <p>The appeal of Mst. Shehla Naz resubmitted today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR</p>  |
| 2-    |                           | <p>This case is entrusted to S. Bench Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be up there on <u>16/07/2021</u>.</p> <p style="text-align: right;"><br/>CHAIRMAN</p>  |
|       | 16.07.2021                | <p>This case belongs to the Hazara Division and such cases were previously heard at camp Court, Abbottabad. May be notices issued to appellant/counsel have not been received by them, therefore, they are not in attendance.</p> <p>Fresh notices be issued to appellant/counsel for preliminary hearing on 11.10.2021 at camp court, Abbottabad.</p> <p style="text-align: right;"><br/>Chairman</p> |

The appeal of Mr. Shehla Naz CT GGHS Kothiala A.Abad received today i.e. on 23/02/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of charge report dated 21.04.2020 mentioned in para-3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal dated 20.11.2020 mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of order dated 15.4.2019 mentioned in para-6 of the memo of appeal is not attached with the appeal which may be placed on it.
- 4- Most of the dates mentioned in the memo of appeal are not matching with the documents which are attached with the appeal.
- 5- Annexure-F of the appeal is illegible which may be replaced by legible/better one.

No. 391 /S.T,

Dt. 23/02 /2021

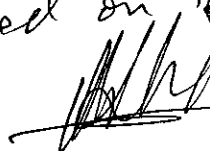
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Arshad Khan Tanoli  
Advocate High Court A.Abad

Sir  
with due respect, the objections are  
addressed as under.

1. correct date of charge report is 21-4-2009  
and is same is placed as desired.
2. Date of departmental appeal is 03-11-2020  
which is placed.
3. Date of impugned order is 5-11-2019 which  
has been corrected.

Para No 4 & 5 have also been corrected.

Inconvenience caused on  part is  
highly regretted.

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021

Shehla Naz C.T Government Girls High School Kothiala Abbottabad.

...APPELLANT

**VERSUS**

Secretary Elementary and Secondary Education Peshawar & others.

...RESPONDENTS

**SERVICE APPEAL**

**INDEX**

| S.# | Description  | Page No. | Annexure |
|-----|--|----------|----------|
| 1.  | Service appeal along with affidavit                            | 1 to 9   |          |
| 2.  | Copy of appointment order and transfer orders of appellant     | 10       | "A"      |
| 3.  | Copy of transfer order of the appellant on deputation          | 11-13    | "B"      |
| 4.  | Copy of charge report at Govt. Girls High School Shamilar Town | 14       | "C"      |
| 5.  | Copy of adjustment order dated 25/06/2018                      | 15       | "D"      |
| 6.  | Copy of relieving order dated 03/02/2020                       | 16       | "E"      |
| 7.  | Copy of impugned order No. 9315-23 dated 05/11/2019            | 17-18    | "F"      |
| 8.  | Copy of departmental appeal dated 23/11/2020                   | 19       | "G"      |
| 9.  | Copy of inquiry report dated 30/12/2020                        | 20-24    | "H"      |
| 10. | Copy of applications of the appellant regarding non-relieving  | 25-27    | "I"      |
| 11. | Wakalatnama  |          |          |

*Shehla Naz*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2021

*(Muhammad Arshad Khan Tanoli)*  
Advocate High Court, Abbottabad

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. 5911 /2021

Shehla Naz C.T Government Girls High School Kothiala Abbottabad.

**Khyber Pakhtunkhwa  
Service Tribunal**

...APPELLANT

Diary No. 3/00

VERSUS

Dated 23/2/2021

1. Secretary Elementary and Secondary Education Peshawar.
- ✓ 2. Director Admin Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- ✓ 3. District Education Officer (Female) Abbottabad.

...RESPONDENTS

**SERVICE APPEAL** UNDER SECTION 4 OF  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
ACT 1974 FOR DECLARATION TO THE EFFECT  
THAT THE PETITIONER WAS TRANSFERRED  
FROM GOVT GIRLS HIGH SCHOOL BAGNOTAR  
TO GOVT. GIRLS HIGH SCHOOL SHALIMAR  
TOWN LAHORE ON DEPUTATION UNDER THE  
WEDLOCK POLICY VIDE ORDER No. 3695/A  
DATED 07/04/2009 AND SHE WAS POSTED AT  
GOVT. GIRLS HIGHER SECONDARY SCHOOL  
KOTHIALA ABBOTTABAD VIDE ORDER dated  
25/06/2018 BUT THE BORROWING EDUCATION  
DEPARTMENT AT PUNJAB DID NOT RELIEVE

**Filed to-day**

**Registrar**

23/2/2021

Re-submitted to -day  
and filed.

**Registrar**

8/6/2021

THE PETITIONER FROM DUTY AS A RESULT, THE  
PETITIONER HAS BEEN REMOVED FROM  
SERVICE VIDE IMPUGNED ORDER  
ENDORSEMENT NO 9315-23 DATED 05/11/2019.  
THE GOVT. OF THE PUNJAB EDUCATION  
DEPARTMENT RELIEVE THE PETITIONER ON  
03/02/2020 THEREFORE, THE PETITIONER FILED  
DEPARTMENTAL APPEAL ON DATED 11/02/2020  
AGAINST THE DEPARTMENT. RESPONDENT NO.2  
DIRECTED TO CONDUCT PROPER INQUIRY IN  
CASE OF THE APPELLANT AND THE INQUIRY  
OFFICER DIRECTED THAT THE PETITIONER  
REMAINED ABSENT FROM DUTY AND THE  
APPELLANT RECEIVED THE INQUIRY REPORT  
ON 25/01/2021. HENCE, IMPUGNED REMOVAL  
FROM SERVICE ORDER DATED 05/11/2019 AND  
INQUIRY REPORT DATED 31/12/2020 ARE  
ILLEGAL AGAINST THE LAW AND THE SAME IS  
LIABLE TO BE SET ASIDE.

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**PRAYER:** ON ACCEPTANT OF THE INSTANT  
SERVICE APPEAL OF THE APPELLANT,  
IMPUGNED REMOVAL FROM SERVICE ORDER  
DATED 05/11/2019 AND IMPUGNED INQUIRY  
REPORT DATED 31/12/2020 MAY BE SET ASIDE

AND RESPONDENT MAY BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE FROM THE DATE OF HER REMOVAL W.E.F THE DATE OF HER REMOVAL WITH ALL BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE ALLOWED TO THE APPELLANT.

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Respectfully Sheweth;-

That Facts forming the background of instant service appeal are arrayed as under;-

1. That the appellant joined service as C.T on 06/11/1994 and served in different schools of District Abbottabad. (Copy of appointment order and transfer orders of appellant are attached as Annexure "A").
2. That the appellant was posted from Govt. Girls High School Bagnetar Abbottabad to Govt. Girls High School Shalimar Town Lahore on deputation under the wedlock policy. (Copy of transfer order of the appellant on deputation is attached as Annexure "B").

3. That the appellant took over the charge of the post at Lahore on 21/04/2000. (Copy of charge report at Govt. Girls High School Shamilar Town is attached as Annexure "C").
4. That the appellant time and again applied for extension of her deputation period and lastly, she was transferred in Govt. Girls Secondary School Kothila vide order dated 25/06/2018. (Copy of adjustment order dated 25/06/2018 is attached as Annexure "D").
5. That Govt. of Punjab Education Department did not relieve the appellant from duty as the appellant was willing to report to her parent department but she was relieved by the Punjab Govt. on 03/02/2020. (Copy of relieving order dated 03/02/2020 is attached as Annexure "E").
6. That the appellant started shuttling in the respondents' offices on her repatriation from the Punjab Govt. with effect from 03/02/2020 and lastly came to know that she has been removed from service on 05/11/2019 vide removal from service order No. 9315-23 dated 05/11/2019.

(Copy of impugned order No. 9315-23 dated 05/11/2019 is attached as Annexure "F").

7. That the appellant came to know about her removal from service on 20/10/2020 and filed departmental appeal on 03/11/2020. (Copy of departmental appeal dated 03/11/2020 is attached as Annexure "G").
8. That respondent No.2 ordered an inquiry in the case of appellant which has been concluded which on 31/11/2020 and the appellant received inquiry report alongwith covering letter dated 21/01/2021 on 25/01/2021. (Copy of inquiry report dated 30/12/2020 is attached as Annexure "H"). Hence, the instant service appeal is filed inter alia on the following grounds.

**GROUND:**

- a) That appellant has rendered more than 26 years of service in education and served the department with complete devotion and dedication.
- b) That impugned removal from service order of the appellant is illegal, void abintio,



corum non iudice and the same is liable to be set aside.

- c) That the respondents' did not issue show cause notice and provided opportunities of personal hearings, to the appellant, therefore, impugned removal from service of appellant is liable to be set aside.
- d) That no major penalty against any employee can be imposed unless prescribed codal formalities are fulfilled. Ex-parte removal from service is not maintainable at law.
- e) That the circumstances under which the appellant was removed from service were beyond her control as a human being, because though the lending (parent) department posted the petitioner at Govt. Girls Secondary School Kothila on 25/06/2018 but the borrowing department at Lahore Punjab did not issued relieving order of the appellant as a result, the appellant could not comply with the order of respondent No:3 dated 25/06/2018, in this regard the appellant informed the parent department. (Copies of applications of the

appellant regarding non-relieving of the appellant by Education of Department of Lahore are attached as Annexure "I).

f) That as per law, proper inquiry was to be conducted prior to the imposition of major penalty. Similarly a so called inquiry on the departmental representation of the appellant was conducted, here again, the appellant was not provided opportunities to defend her case. It is a settled principle of law that when law prescribe a thing which is to be done in particular manner that must be done in that manner and not otherwise. Principle of Audi Altrum Partrvm is applicable in the case of appellants. It is also submitted that no opportunity of fair trial as per Article-10(A) of the Constitution of Islamic Republic of Pakistan 1973 has been provided to the appellant.

g) That the petitioner as and when received impugned removal from service order dated 05/11/2019 received on 25-10-20 and also filed departmental appeal against the said order on <sup>03</sup>~~30~~/11/2020 and finally, the

departmental appeal had been rejected on 31/12/2020 and the said inquiry report was forwarded through covering letter dated 21/01/2021 which was received by appellant on 25/01/2021 therefore, appeal of the appellant is within the period of limitation.

It is, therefore, humbly prayed that on acceptant of the instant service appeal of the appellant, impugned removal from service order dated 05/11/2019 and impugned inquiry report dated 31/12/2020 may be set aside and respondent may be directed to reinstate the appellant in service from the date of her removal w.e.f the date of her removal with all back benefits. Any other relief which this Honourable tribunal deem appropriate in the circumstances of the case may also be allowed to the appellant.

*Shelani*

...APPELLANT

Through

Dated: \_\_\_\_\_/2021

*(Muhammad Arshad Khan Tanoli)*  
Advocate High Court, Abbottabad

**VERIFICATION:-**

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Shelani*

...APPELLANT

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHUWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021

Shehla Naz C.T Government Girls High School Kothiala Abbottabad.

**...APPELLANT**

**VERSUS**

Secretary Elementary and Secondary Education Peshawar & others.

**...RESPONDENTS**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Shehla Naz C.T Government Girls High School Kothiala Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



*Shehla Naz*  
**DEPONENT**

# Annex-A

# P-10

OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION (S) HAZARA DIVISION, ABBOTTABAD.

OFFICE ORDER NO: 43 /AE-VIII/Apptt:  
CT(F) 1994.

DATED ABBOTTABAD THE 06/11/1994.

APPOINTMENT/ADJUSTMENT:-

The following appointment/adjustment of trained CT (F) candidates (Long/Condensed Course) are hereby ordered against CT/SV post as noted against each in BPS-9 (Rs.1605-97-3060) and EPS-14 (Rs.2065-161-4480 in case of BA/B.Sc with IInd Divn:) plus usual allowances as admissible under the rules with effect from the date of their taking-over charge on the following terms and conditions:-

| S.No. | Name of mistress/candidate with address etc.   | School where adjusted/appointed. | Remarks                                    |
|-------|--|----------------------------------|--|
| 1.    | Mst: Intiaz, CT trd: working ag: SV post at GGHS, Giddarpur.   | GGHS, Bagnotar.                  | ag: vacant G.T. post.                      |
| 2.    | Mst: Samina Tabasum, CT trd: working ag: SV post at GGHS, Richh Phen.                                      | " Richh Phen.                    | -do-                                       |
| 3.    | Mst: Chagufta Yousaf, CT trd: work: ag: SV post at GGHS, Battal.   | " Battal.                        | -do-                                       |
| 4.    | Mst: Fakhra Shaheen, CT trd: working ag: SV post at GGMS, Nokot, Man:                                      | GGMS, Kokal Barseen.             | -do-                                       |
| 5.    | Mst: Parah Naheed, CT trd: work: ag: SV post at GGMS, Kaghan, Man:   | " Mang, Haripur.                 | -do-                                       |
| 5.    | Mst: Zahida Bibi, CT trd: working ag: SV post at GGMS, Mohandri, Man:                                      | " Jhanool.                       | -do-                                       |
| 7.    | Bibi Shahnaz, CT trd: working ag: SV post at GGMS, Thathi Khurd, Man:                                      | " Thathi Khurd.                  | -do-                                       |
| 8.    | Mst: Rukhsana Begum, CT trd: work: ag: SV post at GGMS, Chamiali, A/Abad.                                  | GGHS, Behali (Manshra).          | -do-                                       |
| 9.    | Mst: Fakhra Shamim, CT trd: working ag: SV post at GGHS, Drahand (Man):                                    | GGHS, Noolah Sohail              | -do-                                       |
| 10.   | Mst: Lubna Waheed, CT trd: working ag: SV post at GGMS, Talhat, Man:                                       | GGHS, Garhi Habibullah.          | -do-                                       |
| 11.   | Mst: Samina Gul, CT trd: working ag: DI post at GGHS, Malikpura.   | GGHS, Abbottabad.                | Vice Mst: Samina Farid, CT proc: on leave. |
| 12.   | Mst: Nisreen Bibi D/O Muhammad Aslam, Vill: & P.O. Bandi Maira, A/Abad.                                    | GGMS, Marooka, Atd:              | ag: vacant CT post.                        |
| 13.   | Mst: Shehla Naz D/O Q. Mohibur Rehman, Chungi No.1, Kala-pul, Larrec Road, Abbottabad.                     | " Riala, A/Abad.                 | -do-                                       |
| 14.   | Mst: Nightat Qazi D/O Ahmed Saeed Q. Vill: & P.O. Kahal, Haripur.  | " Iassan Thukral.                | -do-                                       |
| 15.   | Mst: Nafeesa Begum D/O Q. Muhammad Nasim, Vill: Dhodial, Nawanshahr, Atd:                                  | " Faris, Manshra.                | -do-                                       |
| 16.   | Mst: Robina Farid D/O Muhammad Farid, CT (Cond: Course) working ag: PTC post at GGPS, Kohar Balan, A/Abad. | " Manli Khira, Atd:              | -do-                                       |

*Attested*  
*M. S. Khan*  
Head Mistress  
G.U.S. Bagnotar, Abbottabad

*Muhammad Arshad*  
Contd: Next page. Advocate  
Office No. 33 A, 10  
Dist. T. Abbottabad

Annex- B

14

Office of the  
Executive District Officer (Edu),  
City District Govt. Lahore

Order No \_\_\_\_\_ /A-IV

Dated. 7-4- /2009

11  
P-12

Subject:- **POSTING/ADJUSTMENT ON DEPUTATION**

In pursuance with orders issued by the Special Secretary (Schools), Govt. of the Punjab, School Education Department, Lahore vide his order No. S.O (S-IV)8-36/2007. Dated: 28-02-2009, Mst. Shehla Naz, SVT, Govt. Girls High School, Bagnotar, Abbotabad, NWFP transferred on deputation and placement of her services at the disposal of this office for further adjustment is hereby adjusted/posted as SVT at Govt. Girls High School Shalimar Town Lahore w.e.f. the date on which she joins against a vacant post on the following terms and conditions:-

1. The deputationist will join at its own expenses.
2. No TA/DA will be admissible on joining in the Department.
3. No Deputation allowance will be paid.
4. Deputationist will draw her salary as per LPC.
5. The tenure of deputation is 3-years only.
6. Punjab Education Department shall not deduct GP Fund and no pension / gratuity shall be paid or born by the Department.
7. The incumbent shall automatically deem repatriated after completion of deputation period and any delay on the part of deputation in reporting back to its parent department shall be considered as an absence from duty.


Dr. Muhammad Arshad.  
**Executive District Officer (Edu)**  
**City District Govt. Lahore.**

Endst No. 3696 /A-III.

Copy forwarded for information and necessary action to:-

1. The Accountant General Punjab, Lahore .
2. The Special Secretary (Schools), Govt. of the Punjab, School Education Department, Lahore.
3. The Secretary Education Govt. of NWFP.
4. The District Education Officer concerned.
5. The Headmistress concerned.
6. The lady teacher concerned.
7. Notification File.

**ATTESTED**

  
**Executive District Officer (Edu)**  
**City District Govt. Lahore.**

Muhammad Arshad Khan  
Advocate High Court  
Office No: 33 Adjacent  
Dist Bar Abbottabad

B

P-19

11

GOVERNMENT OF NWFP  
SCHOOLS & LITERACY DEPARTMENT.

ORDER.

NO. SO(PE)5-2/203/07/Shehla Naz CT. In pursuance of NOC issued by the Government of NWFP Establishment Department vide No. SOR-I (E&AD) 1-14/82/(VOL.XII) dated 17-11-2007, the services of Ms. Shehla Naz CT Govt. Girls High School Bagnetar Abbottabad (NWFP) are hereby placed at the disposal of the Govt. of Punjab Education Department (School Wing) Lahore on deputation basis for initial period of 03 years on the terms & conditions contained in the Govt. of Punjab Education Department (School Wing) letter No. SO (SE-IV) 8-36/2007 dated 29-09-2007.

SECRETARY TO GOVT. OF NWFP  
SCHOOLS & LITERACY DEPARTMENT.

Endst. No. SO (PE) 5-2/203/07/Shehla Naz CT. Dated Pesh, the, 07-1-2008.

Copy forwarded to:-

1. The Secretary to Govt. of NWFP Establishment Department w/r to his letter No. quoted above.
2. The Secretary to Government of Punjab Education Department School wing Lahore w/r to his letter No. quoted above.
3. The Director School & Literacy NWFP Peshawar w/r to his letter No. 4824/F.No. A-68/IP/CF Hazara dated 15-12-07.
4. The Distt: Accounts Officer Abbottabad.
5. The Executive District Officer School & Literacy Abbottabad with the request to relieve and direct the lady teacher to report to the Executive District Officer (Education) Lahore Punjab. for adjustment against the vacant post of CT.
6. Mst. Shehla Naz, CT Govt. Girls High School Bagnetar Abbottabad.

SECTION OFFICER (PRIMARY)

**TESTED**

*Muhammad Arshad Khan Tar.*  
Muhammad Arshad Khan Tar.  
Advocate High Court  
Office No. 33 Adjacent  
Distt Bar Abbottabad

UNDER SECRETARY (S-IV)

6

# Annex-B

To,

The Executive District Officer,  
(S&L) Abbottabad.

P. #  
13

Subject:-

TRANSFER FROM GGHS BAGNOTAR ABBOTTABAD TO ANY GGMS/GGHS LAHORE. (PROPER CHANNEL)

R/Sir,

With due respect and humble submission that I am serving at Govt Girls High School Bagnotar since April-20 and my husband is serving in WAPDA at Lahore. Sir my childrens are now school going so I faces many difficulties. I am unable to performed my duties at this far and wide station from my childrens and husband.

So, It is requested that transfer me from GGHS Bagnotar District Abbottabad NWFP to any middle/high School District Lahore Punjab according to Govt policy that husband and wife served at same station/District/Province.

Thanks

*Shela Naz*  
Yours Osediently,

No- 368 dt. 14-06-1206

*Recommended & forwarded in original  
the applicant is serving at this school.  
Please transfer her to Lahore.*

*Jaleez*

Head Mistress  
Govt Girls High School  
Bagnotar Abbottabad

Shela Naz, CT Teacher  
GGHS Bagnotar Abbottabad  
NWFP.

**TESTED**

*Muhammad Arshad Khan Tanoli*  
Advocate High Court  
Office No 33 Adjacent  
Distt Bar Abbottabad



Annex-C

60

P-13

P-14


Office of the Principal,  
Government Girls High School,  
Shalimar Town, Lahore.

No. 114 /ST

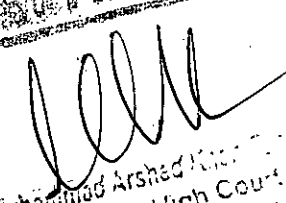
Dated. 18-7 /2018

SERVICE CERTIFICATE

It is certified that Shehla Naz  
S/D/W/O Sagheer Ahmed is working in Education Department  
as S.N Teacher since on deputation and working in this  
school w.e.f 21-4-2009 to date. She/He draw  
her/his Basic Pay Rs. 4779/- P.M in BS No. 16

  
Principal, 18-7-18  
Government Girls High School,  
Shalimar Town, Lahore.

**TESTED**

  
Muhammad Arshed Khan  
Advocate High Court  
Office No: 33 Adjacent  
Distt Bar Abbottabad

Annex. C

57

RELIEVING CHIT.

P-14-A

In compliance with the orders of Government of NWFP Elementary and Secondary Education Deptt: Peshawar office order issued vide No.SO(PE)5-2/IPT/Abbottabad/Vol:II dated 15.4.2009, Mst: SHEHLA NAZ, CT Govt:Girls High School, Bagnotar is hereby relieved off from her duty today on 21.4.2009 and directed to report her duty at Govt:Girls High School, Shalimar Town, Lahore (Punjab).

COUNTERSIGNED.

*M. Q. Q.*

HEAD MISTRESS *Shehla Naz*  
GOVT: GIRLS HIGH SCHOOL *Head Mistress*  
BAGNOTAR (ABBOTTABAD) *Abbottabad*

*Z. Khan*  
EXECUTIVE DISTRICT OFFICER  
ELEM: & SECY: EDU: ABBOTTABAD.  
Executive District Officer  
School & Literacy  
Abbottabad



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

PH# No. 0992-342533 FAX:0992-342314  
E-mail [deofemale\\_abbottabad@yahoo.com](mailto:deofemale_abbottabad@yahoo.com)

No: 5165-67 EB-II/Transf,Adjst Dated. 25 /06/2018

P-16

**ADJUSTMENT**

**Annex-D**

P-15

Consequent upon the approval of competent authority, Mst. Shehla Naz Ex-CT Government Girls High School Bagnoter return from Deputation is hereby adjusted at Government Girls Higher secondary School Kuthiala Abbottabad against the vacant post of CT on her own pay and grade in the interest of public service with effect from the dated of taking over charge on the following terms and conditions.

1. The teacher will have to join this post within (30 days) after issuance of this letter.
2. The teacher is directed to provide your service documents i.e Service Book, LPC service record w.e.f 07.01.2008 till now at the time of joining the post.
3. If the teacher failed to join the post within stipulated period it will be presumed that she is not interested to retain parent department.
4. The deputation period which has not been extended by the authority w.e.f 7.1.2011 to date of joining will be decided/included in service subject to the approval of competent authority with the consent of Punjab Government.

District Education Officer  
(Female) Abbottabad

**Even No. & Date:-**

Copy for information to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar with reference his letter No.596/P.File Shhzela Naz CT/IPT dated Peshawar the 04.04.2017.
2. Shela Naz EST GGHS Shalimar town Lahore.
3. Principal GGHS Shalimar Town Lahore, with the remarks that please relieve the teacher concerned alongwith all service documents.

District Education Officer  
(Female) Abbottabad



Muhammad Arshad Khan Tariqi  
Advocate High Court #  
Office No 33 Adjacent to  
Distt. Bar Abbottabad

# Annex-E

GOVERNMENT OF THE PUNJAB  
SCHOOL EDUCATION DEPARTMENT

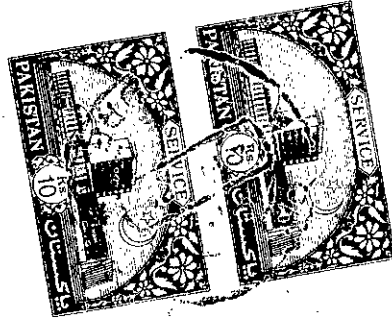
P-16



No.SO(SE-IV)8-36/2007. The Competent Authority has approved the repatriation of Mst. Shehla Naz, SVT Govt. Girls High School, Shalimar Town, Lahore (Deputationist from Khyber Pakhtunkhwa), with immediate effect.

2. She is hereby directed to report to her parent department i.e. Government of Peshawar, Education Department, KPK for her further posting / adjustment at the earliest.

DEPT. OF EDUCATION  
LAHORE  
Dated Lahore, the  
03-02-2020  
No. & Date Even:



(UZMA KIYANI)  
SECTION OFFICER (SE-IV)

A copy is forwarded for information and necessary action to:

1. The Secretary, Government of Peshawar, Education Department, KPK.
2. The Accountant General, Punjab, Lahore / District Accounts Officer Lahore.
3. The Directorate of Public Instruction (EE), Punjab, Lahore.
4. The Deputy Commissioner / Administrator DEA, Lahore.
5. The Chief Executive Officer, DEA, Lahore with the direction to relieve the above named lady teacher immediately under intimation to the Department.
6. The District Education Officer (W/SE), Lahore.
7. The Principial concerned.
8. The teacher concerned.

Uzma Kiyani  
03-02-2020

**ATTESTED**

(UZMA KIYANI)  
SECTION OFFICER (SE-IV)

CC:

PRINCIPAL  
Govt. Girls High School  
Shalimar Town, Lahore.

1. PS to Secretary School Education.
2. PS to Special Secretary (Operations).
3. PS to Additional Secretary School.
4. PA to Deputy Secretary (EE)

**ATTESTED**

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad

# Annex-F



## OFFICE OF THE DISTRICT EDUCATION

### OFFICER (FEMALE) ABBOTTABAD

PH# No. 0992-342533 FAX:0992-342314

E-mail [dcofemale\\_abbottabad@yahoo.com](mailto:dcofemale_abbottabad@yahoo.com)

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#### REMOVAL FROM SERVICE

1. WHEREAS, you Mst. Shehla Naz Ex-CT GGHS Bagnotar Abbottabad is proceeded on deputation vide Government of Khyber Pakhtunkhwa Education Department letter No. SO(PE)5-2/203/07/ShCT dated 7/01/2008 from Govt. of Khyber Pakhtunkhwa to Govt. of Punjab.
2. WHEREAS, in pursuance of above mentioned letter Govt. of Punjab adjusted you on (SVT) post for the period of 03 year vide order No:3695/A-IV dated 07/04/2009 and you relieved off from GGHS Bagnotar Abbottabad on 21/04/2009 for joining your duty at new station GGHS Shalimar town Lahore Punjab.
3. WHEREAS, your deputation period was expired on 20-04-2012 but you neither joined your parent department w.e.f 21/04/2012 nor submitted any extension letter.
4. WHEREAS in connection to letter No-8261, dated 3/12/2016 the Director E & SE Khyber Pakhtunkhwa directed this office vide letter No.242/P.File Shehla Naz CT/PT dated Peshawar the 28.12.2018 to inform the teacher concerned to join her duty in her parent Deptt. with immediate effect and after adjustment to process her case for regularization/sanction of unauthorized stay at Govt. of Punjab vide latter No:596 dated 04/04/2017.
5. WHEREAS in pursuance of the direction of honorable Director(E&SE) Khyber Pakhtunkhwa this office has directed you to resume your duty with immediate effect vide letter No-266-67 dated 18/04/2018 and No-5157 dated 09/05/2018, but you once again failed to resume your job.
6. WHEREAS After that you submitted another appeal to the Director(E&SE) of Khyber Pakhtunkhwa Peshawar. The Director forwarded your appeal to this office vide letter No 3394 dated 19/06/2018 for further necessary action.
7. WHEREAS in pursuance of your appeal received through the Director (E&SE) Khyber Pakhtunkhwa Peshawar. You have been adjusted at GGHS Kuthiala Abbottabad vide letter No:5165-67 dated 26/06/2018 but you failed to take over charge at your duty station.

**ATTESTED**  
  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad

8. WHEREAS this office served you show cause notice through Director (BASE) Peshawar at your school address vide No 658 dated 19/09/2019 and final dissent notice served you through daily news paper Nawai Hazara and Sarhad News dated 28/06/2019.

9. WHEREAS you did not submit your reply within the stipulated period. The reason behind your will full absence seemed that you are not interested to join your job/duty.

10. WHEREAS the competent authority District Education Officer (Female) after having consideration on the charges and evidence of record, is of the view that the charges against you have been proved.

NOW THEREFORE in exercise of power conferred upon under section 4(b)III of Khyber Pakhtunkhwa Govt servants Efficiency and Discipline Rules 2011 District Education Officer (Female) as competent authority is hereby imposed Major penalty of REMOVAL FROM SERVICE upon Mst: Shehla Naz Ex-CT GGHSS Kuthiala Abbottabad with immediate effect.

(REHANA YASMEEN)  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

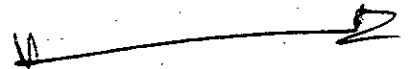
9315-23  
Indst.No. \_\_\_\_\_/EB-II/Removal from service Dated Abbottabad the 5/11/2019


Copy For Information And Necessary Action To The:-

1. Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Abbottabad.
3. District Accounts Officer Abbottabad.
4. Headmistress GGHS GGHS Shalimar town Lahore.
5. Budget & Accounts Officer Local Office Abbottabad.
6. Headmistress GGHS Bagnoteer.
7. MST:Shehla Naz Ex-CT concerned
8. Office File.

**ATTESTED**

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Distt Bar Abbottabad

  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

  
2/11/19

خدمتِ جہا۔ ڈائریکٹر صاحب اہلیطری اینڈ سیکرٹری آئی جی ٹی اے اے پی سی KPK  
توان: ایسی برخلاف برخواستہ ملکہ حسنہ

Adil Pant  
Handwritten signature

Annex-9

جناب عالی  
تذراش جگہ سائڈ بجٹ آج گورنمنٹ گز حاشی سکول بگنور ضلع اہلیٹ آباد  
ن ایس ایس مینبر سرانجام دے رہی تھی کہ سائڈ سے خاوند جوہر محکمہ واپس آجنگا۔ لاہور میں  
لازم ہیں کے اجا پر ڈیپوٹیشن کیے درخواست دی تھی، چونکہ سائڈ سے مجھے ایسے والد  
ہیں لاہور میں رہ کر زبور تعلیم سے آرا کسہ طور سے ہیں۔ جگہی ہم سائڈ حرج گھٹی سے  
والدہ سے کوسوں میں دور رہنے کے اور سائڈ اکیلی مذکورہ بالا سکول میں ایسے فرانس  
نہی سرانجام دے رہی تھی۔ سائڈ کی درخواست منظور ہوئی اور سائڈ کو 2009ء کو 21  
12ء میں سائڈ ایسے ڈیپوٹیشن پر حکومت پنجاب محکمہ تعلیم بگنور دیا گیا  
تعلیم لاہور نے سائڈ کو مذید گورنمنٹ گز حاشی سکول شہر لہور ٹاؤن لاہور  
ڈیپٹ کیا۔ سائڈ نے 2012ء کو مذکورہ سکول میں ایسے فرانس مینبر سرانجام  
تھے۔ سائڈ کی ایپلٹیشن بگنور ڈسٹرکٹ اور جی آر افسر زمانہ ایسٹ آباد بگنور 5185-67  
تاریخ 25/2/2018ء گورنمنٹ گز حاشی سکول کھیل ہوئی مگر حکومت پنجاب محکمہ تعلیم لاہور نے  
2020ء کو 4 کو ~~Cancelled~~ کیا اور ڈسٹرکٹ ایگزیوشن آفسر (SE) لاہور نے صفحہ 102  
102  
20  
Counsel کیا۔ جبکہ سائڈ کو ڈسٹرکٹ ایگزیوشن آفسر زمانہ ایسٹ آباد نے  
9315-23  
5-11-19  
بگنور 5185-67  
سائڈ کو جب محکمہ تعلیم پنجاب لاہور نے صفحہ 2020ء کو 2  
Removal from Service کر دیا تھا۔  
2020ء کو 10  
Counsel کیا تو سائڈ نے 11/2/2020ء کو آنفون کو ایسے کر دیا  
2020ء کو 10  
SE، زمانہ ایسٹ آباد نے فوراً سے برخاست کر دیا ہے۔ نیز ایسے فرانس  
2020ء کو 10  
سائڈ کو فوری بحال کیا جائے۔ جبکہ سائڈ کو ایسے فرانس مینبر محکمہ تعلیم لاہور پنجاب میں  
2020ء کو 10  
سائڈ کو سرانجام دینے۔ سائڈ ایسے طور پر افسران مجاز کی مرضی اور حکم کے بغیر تو  
ہیں لگتی تھی۔ جب محکمہ تعلیم لاہور پنجاب نے ~~Cancelled~~ کیا تو سائڈ نے ایسے  
تعلیم کے سرواہ کو حافی بھی کر دی اور ایسے جی آر ایس ایس کو فوری بحال کر دیا جائے  
نخواہ بحال کیا جائے۔ سائڈ وظیفی ملازمت میں لگی ہے۔ نیز سائڈ کی وظیفی و مالی و رہنمائی حکم  
رہا کہ سائڈ کو کسی بھی ایسٹ آباد کے حافی / مٹری سکول میں ڈیپٹ کیا جائے

ATTESTED  
Handwritten signature

Muhammad Arshad Khan Tanoli  
Advocate High Court -  
Office No 33 Adjacent to  
Distt Bar Abbottabad

صفحہ 27

Shehbaz





Annex-H



**DISTRICT EDUCATION OFFICE (FEMALE)  
MANSEHRA**

@ [deofmanselra@yahoo.com](mailto:deofmanselra@yahoo.com)



P-20



No. 10684

Dated: 31/12/2020

To

The Director  
Elementary & Secondary Education Department Peshawar.

SUBJECT:- INQUIRY REPORT

Respected Sir

Reference your notification No. 5734-36/F.No. 364 (F) Appeal Abbottabad Dated Peshawar the 03/11/2020 regarding appeal in respect of Shehla Naz Ex-CT GGHS Kuthiala District Abbottabad.

**1. Place of Inquiry:- DISTRICT EDUCATION OFFICE (FEMALE) ABBOTTABAD**

**2. Background:-**

Mst: Shehla Naz Ex-CT who was on deputation w.e.f. 07/04/2009 to 07/04/2012 for the period of three years to Punjab Province. After the expiry of her deputation period i.e. 08/04/2012 she has not joined her original school at District Abbottabad & remained absent from duty. The DEO (F) Abbottabad has removed her from service on 05/11/2019 after fulfilling codal formalities.

**3. Procedure:-**

After receiving a letter of nomination as inquiry officer, the undersigned dispatched a letter to District Education Officer (Female) Abbottabad vide No. 9370 Dated 06/11/2020 with the request to make all the concerned officers/officials available in her office on 11/11/2020 along with the relevant record to inquire the matter. The inquiry proceedings were initiated on 11/11/2020 & 02/12/2020 at the office of DEO (F) Office Abbottabad. The following officers/officials were found present:-

1. Rehana Yasmeen District Education Officer (Female) Abbottabad.
2. Dealing Assistant
3. Shehla Naz Ex-CT

**4. Findings:**

1. On the request of Mst: Shahla Naz Ex-CT for transfer on deputation to Punjab, through letter issued by Government of NWFP Peshawar vide No. SO (PE) 5-2/203/07/Shehla Naz CT dated 15/08/2007 to the Secretary to Govt: for Education Department Punjab for the purpose of NOC (No Objection Certificate) (Anneuxre-I)

Jok

Handwritten signature

97  
5-1-2021

p-21

78

- The Secretary to Govt: for Education Department Punjab issued NOC vide No. SO (SE-IV) 8-36/07 Dated 29/09/2007 with condition at S # No. VI showing that " the period of deputation is three years". (Annexure-II)
3. After completion of all codal formalities, the Secretary to Govt: for Education Department Punjab issued her transfer on deputation basis through order vide No. SO (SE-IV) 8-36/2007 Dated 28/02/2009 for the period of three years (Annexure-III) & further posting/adjustment order issued by Executive District Officer (Edu) City District Govt: Lahore vide No. 3695 Dated 07/04/2009 (Annexure-IV) at GGHS Shalimar Town.
  4. Mst: Shahla Naz Ex-CT was relieved from GGHS Bagnotar District Abbottabad on 21/04/2009 for performing her duty at Punjab. (Annexure-V)
  5. After the expiry of deputation period i.e. 08/04/2012, the teacher concerned did not join her original School of District Abbottabad, instead of submitting applications her parent department (KPK) for further extension in deputation period, she approached different forms i.e. Chief Minister/Secretary to Govt: for Education Department Punjab etc.
  6. During the over stay of Mst: Shahla Naz Ex-CT in Punjab, the DEO (Female) Abbottabad showed her as absent from duty and in this regard correspondence was made with Director E&SE KPK Peshawar for guidance/action through letter No. (Director letters) 3524 Dated 22/05/2015 (DEO letters) 11288 Dated 08/10/2015, 1680-82 Dated 10/03/2016, 8261 Dated 30/12/2016. (Annexure-VI to IX). The DEO (F) Abbottabad issued show cause notice to Mst: Shahla Naz Ex-CT vide No. 750 Dated 11/02/2016. (Annexure-X) Mst: Shahla Naz Ex-CT did not reply to this show cause notice, however after elapse of 10 months she submitted reply with the request to extend the period or further adjustment at near by home. (Annexure-XI) She submitted different applications to District Education Officer (F) Abbottabad for further adjustment in different schools on 25/05/2017, 27/03/2018, 03/06/ 2018 at GGHS Bagnotar, GGHS Aziz Bang, GGMS Nagaki (Annexure-XII). She also filed an appeal in respect of Director E&SE KPK Peshawar on 03/06/2018 which was sent to DEO (F) Abbottabd through letter No. 3394 Dated 19/06/2018 for further action (Annexure-XIV)
  7. In the light of the order by Director E&SE KPK Peshawar, the DEO (F) Abbottabad issued the letters No. 2666-67 Dated 18/04/2018 & 5157 Dated 09/05/2018 (Annexure-XV) to Shahla Naz Ex-CT to join her duty at District Abbottabad, so that her case could be submitted to the competent authority for regularization/sanction of un-authorized stay at Punjab, but she has failed to do so.
  8. DEO (F) Abbottabad has also adjusted the said teacher at GGHSS Kuthlala against vacant post vide No. 5165-67 Dated 25/06/2018 with the condition that her deputation period which has not been extended by the concerned authority will be decided subject to the approval of competent authority with the consent of Punjab government (Annexure-XVI), & the teacher concerned has joined the school on 01/07/2018. (Annexure-XVII)
  9. The DEO (F) Abbottabad has informed the Director E&SE KPK through letter issued on 02/07/2018 about her adjustment and also regularization of unauthorized stay in punjab. (Annexure-XVIII)
  10. After the arrival of Mst: Shahla Naz Ex-CT in district Abbottabad dated 01/07/2018, she again remained absent from duty and submitted an application in the name of DEO (F) Abbottabad

Advocate High Court  
Office No. 33 Adjacent to  
Dist. Bar Abbottabad

*[Handwritten signature]*

- for extension of arrival date in the school as the authority of Punjab has not relieved her. The said application not found in the record of office file. (Annexure-XIX)
11. The DEO (F) Abbottabad has again informed the Director E&SE KPK Peshawar through letter No. 7845-47 Dated 03/11/2018 about her absence from duty. (Annexure-XX) & issued a show cause notice vide No. 658 Dated 19/01/2019 (Annexure-XXI) which was sent to Director E&SE KPK Peshawar through letter No. 658 Dated 19/01/2019 to take up with concerned authority of Punjab. In continuation an absent notice has been published through "new paper daily Sarhad" on 28/06/2019 (Annexure-XXII). Mst: Shahla Naz Ex-CT stated that she did not have any information about show cause notice & published notice in new papers.
  12. Hence due to non-availability of reply in stipulated period, the DEO (F) Abbottabad has imposed major penalty and issued her removal from service order vide No. 9315-23 Dated 05/11/2019. (Annexure-XXIII)
  13. Mst: Shehla Naz Ex-CT during the inquiry shared the different correspondence in terms of letters/applications with Govt: of Punjab to get favour from parent department (Annexure-12 nos), but in fact her this act shows that she deceived the parent department.

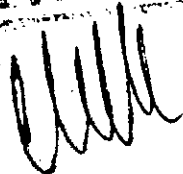
**5. On analyzing the documents on record & personal statement of the concerned teacher, as well as discussions it appeared that:**

1. Initially the teacher concerned got deputation for a period of three years i.e. 07/04/2009 to 07/04/2012.
2. She should have contacted the parent department for further extension in deputation period before expiry of deputation period, but she remained silent. However she started unnecessary correspondence with the Govt: of Punjab for further extension despite knowing that her job status was not clear in her parent department (KPK).
3. Government of KPK gave her an opportunity despite her long absence from job on expiry of deputation period, but she played hide and seek with the parent department by making herself available at school at GGHS Kuthiala on 01/07/2018 and again remaining absent.
4. She wasted precious time of DEO (F) Abbottabad as well as Director Elementary & Secondary Education KPK Peshawar.
5. Her application for further extension on 01/07/2018 after joining GGHS Kuthiala seems bogus as it is not found in office record of DEO (F) Abbottabad.

**6. Recommendations**

After going through the written responses & detailed discussions with all the concerned, the undersigned has come up with the following recommendations:-

ATTESTED



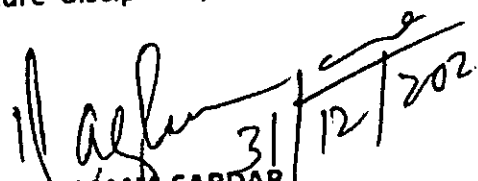
Muhammad Arshad  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

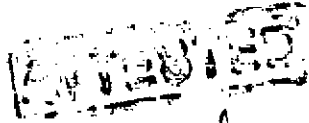
P-23

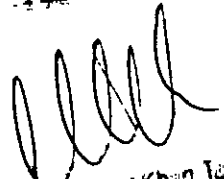
89

Her removal from service order issued by DEO (F) Abbottabad under Endstt: NO. 5165-67 dated 05/11/2019 is a right decision under E&D rules as she remained willful absent from parent department on expiry of deputation period.

2. In every deputation case the deputationest do not came back to parent department on expiry of deputation period which makes their job status unclear. There should be a proper procedure of taking oath on legal paper that they will inform their parent department six month before expiry of deputation period. In case of failure disciplinary action would be initiated against them considering them absent from duty.

  
NAGHMANA SARDAR  
31/12/2020  
DISTRICT EDUCATION OFFICER (FEMALE)  
MANSEHRA/ INQUIRY OFFICER



  
Muhammad Arshad Khan Tunc  
Advocate High Court  
Office No 33 Adjacent t  
Distt Bar Abbottabad



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

No. 2966 /F.No.364/F/Appeal A,abad

Dated Peshawar the 20/1 /2020

To

The District Education Officer,  
(Female) Abbottabad

Subject:- **INQUIRY REPORT**

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Mst. Naghmana Sardar DEO (Female) Mansehra against Mst. Shehla Naz Ex-CT District Abbottabad and to ask you to implement the recommendations of the enquiry officer.

Endst No. 2967

Copy of the above is forwarded to the:

1. Shehla Naz Ex-CT GGHS Bagnoter with the remarks that your appeal has been seen & filed by the Competent Authority.
2. PA to Director E&SE KPK Peshawar.

*[Signature]*  
Deputy Director (Female)  
E&SE Khyber Pakhtunkhwa

*[Signature]*  
19/11/21

*[Signature]*  
Deputy Director (Female)  
E&SE Khyber Pakhtunkhwa

*[Signature]*  
18/11/21

**ATTACHED**

*[Signature]*  
Muhammad Arshad  
Advocate High Court  
Office No 33 Adjacent  
Distt Bar Abbottabad

حضرت صاحب مکرمین صلی اللہ علیہ وسلم کی بیٹی سولہ برس کی عمر میں  
کیا گیا ہے

Annex-1

صفحہ نمبر 1

P.25

گزارش ہے کہ سالہ گذشتہ نومبر 2009-4-21 سے

گورنمنٹ گزٹنگ سول سائبریا اور سول سائبریا

پر EST (S) کی سرکاری ہے۔ ان سالہ

والس اسے سول گورنمنٹ KPK جانا حاصل ہے

سزا آج سے گزارش ہے کہ سالہ گورنمنٹ سے

Relieving کے لئے جاری کیا جائے گا سالہ والس اسے

گورنمنٹ میں حکمرانی کے لئے جان کر کے

ایک عین وزارت ہوگا۔

سیدہ  
EST  
سول گورنمنٹ گزٹنگ سول  
سول گورنمنٹ گزٹنگ سول

العراق

ATTESTED

15-7-19

Muhammad Arshad Khan Esq.  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad

خدمت جناب سیکرٹری آف ایجوکیشن صاحب پنجاب (لاہور)

Extention / Releaving (طما) عنوان

26-2 جناب عالی ا

خودمانہ گزارش ہے کہ سائل شہداء مارچ 2009-4-21 سے آرڈر نمبر 8-38/2007 (SE-IV) No. SO کے تحت گورنمنٹ گریجویٹ سکول شہداء حارث آباد میں بطور EST تدریسی و افسانہ انجام دے رہی ہے۔ سائل نے ڈیپوٹیشن کا طرہ سے تین سال ختم ہونے سے قبل 2012-4-11 میں درخواست آرڈر نمبر 10140626/ NO-PA/ASA/CM/12 AA-123B جمع کروائی۔ بعد دربارہ 2-8-12 کو درخواست دی اور نئے لکھنؤ کے تحت درخواست دی۔ کوئی بھی شہداء نہ ہونے پر 2015-4-13 - اسی طرح 23-8-16 کو آرڈر No. STO/SSCM/15/AA-123 (060275) درخواست دی۔ کوئی بھی شہداء نہ ہونے پر 2018-11-20 کو دربارہ آرڈر نمبر 8177 کے تحت درخواست دی۔

اس کے بعد 16-8-2019 کو آرڈر نمبر (02490) 07-97/2019/CMO (DS/SS) NO-DS کے تحت درخواست برائے Extention / Releaving دی۔ لیکن جناب عالی اچھے تکھے کوئی بھی آرڈر نہیں دیا گیا۔

میں جناب عالی انہی درجہ اعلیٰ ادارہ اور تدریسی سے سکول ہذا میں ڈریس کر رہی ہوں۔ اس سے التماس ہے کہ مجھے گورنمنٹ کے ایجنٹیشن دیا جائے یا پھر مجھے ایجنٹ آرڈر دے جائیں تاکہ میں اپنے Home department کا طرہ سے سکول۔  
اپنی عین توازن ہوگی

السلامت  
سائل  
شہداء مارچ  
E.S.O  
گورنمنٹ گریجویٹ سکول شہداء حارث آباد  
لاہور

TESTED

Muhammad Arshad Khan Tanc  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

01  
01/2020

حضرت جناب ڈی ای او صاحبہ راناہ عدالت میں اپنے آگے

59

عنوان درخواست برائے توسیع حاکمیت رولز

27-2

جناب عدالت

خودمانہ گزارش ہے کہ عزیز مدعی صاحبہ نے مستند نامہ لای گورنمنٹ گریجویٹ سکول  
شادمانہ ٹاؤن کو آرڈر نمبر 516567 EA کے تحت گورنمنٹ گریجویٹ سکول  
کو بحالہ میں ادھت کیا۔ آرڈر کے مطابق میں Arrival دے رہی۔ اور پنجاب ہاؤس  
سکیم کے آف ایجوکیشن کو Reliance کے لئے درخواست دی۔ جو تکمیل میں ہے۔  
میں گورنمنٹ تبدیل ہے۔ اس لئے مجھے ریلیف میں کچھ مسائل درپیش ہیں۔  
آپ صاحبہ سے درخواست ہے کہ مجھے نئے سکول کو بحالہ میں آجوں میں جاری  
کئے جائیں۔ میں سے Extension دی جائے۔ آپ کی ترقی میں رہا ہوگی۔  
درخواست کیا ہے جس میں اس کے لئے اور سکیم کے لئے میں دائر درخواست کی جا رہی  
ہوگی۔

شکریہ

الکافی

دعا و مرحمت  
شادمانہ  
516567 EA  
گورنمنٹ گریجویٹ سکول شادمانہ ٹاؤن  
18-7-18

فون نمبر 03218876331  
35201969340842  
انٹرنیٹ صفحہ نمبر 2 - صفحہ آغاز  
شادمانہ ٹاؤن ہاؤس

Attested Date 18-7-18  
Muhammad Arshad Khan  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad



**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD.**

SERVICE APPEAL NO 5911-A /2021

MST SHEHLA NAZ..... APPELLANT

VS

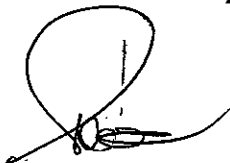
**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH**  
**SECRETARY EDUCATION DEPARTMENT PESHAWAR &**  
**OTHERS.....RESPONDENTS**

**INDEX**

| S. No | Description   | Annexure | Page-No. |
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| 1.    | Para wise comments & Affidavit  |          | 1-4      |
| 2.    | Photocopy Correspondence letters                                      | "A"      | 5-8      |
| 3.    | Photocopy of show cause notices<br>and proceedings                    | "B"      | 10-41    |
| 4.    | Photocopy of inquiries reports  | "C"      | 42-47    |
| 5.    | Photocopy of letter which show the<br>receipt of appellant show casue | "D"      | 48-49    |

Respondents

Dated \_\_\_\_\_



Through Representative

①

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD.**

SERVICE APPEAL NO 5911-A /2021

MST SHEHLA NAZ..... APPELLANT

VS

**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH  
SECRETARY ELEMENTARY & SECODNARY EDUCATION  
DEPARTMENT PESHAWAR & OTHERS.....RESPONDENTS**

**Para wise comments on behalf of the Respondents No 1 to 3.**

**Respectfully Sheweth:**

Para wise comments on behalf of the respondents No 1 to 3 are as under.

**PRELIMINARY OBJECTIONS.**

1. That the appellant has no locus standi/cause of action to file service appeal.
2. That the service appeal is not maintainable in its present form.
3. That the appellant has not approach this Honorable Tribunal with clean hands.
4. That the appellant suppressed the original facts from this Honorable tribunal and not entitled for any relief and service appeal is liable to be dismissed.
5. That the service appeal is hopelessly time barred.
6. That the service appeal is bad for mis-joinder non -joinder of the necessary and proper parties.
7. That the appellant is stopped to agitate the instant matter before this Honorable Tribunal.
8. That the act of the respondent is in accordance with law and rules and law hence appeal is liable to be dismissed.

27/4/21

1

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTABD.**

SERVICE APPEAL NO 5911-A /2021

**MST SHEHLA NAZ..... APPELLANT**

**VS**

**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH  
SECRETARY ELEMENTARY & SECODNARY EDUCATION  
DEPARTMENT PESHAWAR & OTHERS.....RESPONDENTS**

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7. That the appellant is stopped to agitate the instant matter before this Honorable Tribunal.
8. That the act of the respondent is in accordance with law and rules and law hence appeal is liable to be dismissed.

27/4/22

2

**FACTUAL OBJECTION**

1. Para No.1 of the service appeal is pertains to records. Hence no comments.
2. Para No.2 service appeal is pertain to record.
3. Reply of Para No. 3 of the Service appeal is that the appellant wrongly mentioned in her Service appeal that she took over charge on 21-04-2020, and annexed the charge report, while the annexure annexed as annexure "C" is service certificate in which the detail has mentioned. The department had initiated proceedings at the end of the appellate deputation period, Respondent No. 2 and Respondent No. 2 collected data of all those teachers in the province who were on deputation and were asked to take action against them. (Photocopy of Correspondence are annexed as Annexure "A")
4. Reply of Para 4 of the appeal is that appellant was deputed on the basis of wedlock policy from GGHS Bagnotar Abbottabad to Government High School Shalimar Lahore 21-04-2009, as per wedlock policy only 5 years extension has awarded to the any civil servant. But the appellant without any permission stay there and lastly she was adjusted at GGHS Kuthila Abbottabad on 25-06-2018, but she failed to take charge in the concern school. Further stated that the appellant remain absent during whole time and proceeding has been made against her as pre rules and Policy. Show cause was issued against the appellant due to his absence which was due to non-deputation to which he replied but no request was made in this regard. The appellant was also asked in the newspapers to ensure his presence. (Photocopies of show cause notices and proceedings are annexed as Annexure "B").
5. Para No 5 of the appeal is that Government of Punjab remains the appellant on service without any extension. Appellant continue her service at their on her own will and with the help of Punjab Government without authorized deputation extension. It show that the appellant remain there illegally and without sanction/extension of her parents department. This show the misconduct of appellant. Inquiries were also conducted against the appellant. Which proves that the absence of the appellant was intentional, and she stay there without permission of lawful authority. (Photocopies of inquiries reports are annexed as Annexure "C").
6. Reply of Para No 6 of the appeal is that Craft this Para by save her skin and to save herself from all charges level against her. However, it has been proved in the inquiry that the appellant has not made any application to her parents department after the end of her deputation. Furthermore, the appellant's deputation as per the rules was only five years which ended in 2014. The department had collected the details of all the employees who were on deputation from KPK province to other Provinces, and all the district officers had made recommendations for action against them. The appellant's removal from the service was made in accordance with all legal requirements. Show cause was issued to Appellant, in which the appellant replied but still did not make any further request. Show cause was also given in the newspapers to which the appellant did not respond. While the show cause issued by the department which was sent by the authority to the Punjab

government has received by the appellant. (Photocopy of show cause in which the receiving of appellant proved is annexed as Annexure "D")

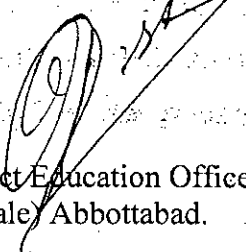
7. Reply of Para 7 of the Service Appeal is that, it is submitted that the appellant has given various justifications in this Para of the instant Service appeal that the appellant was informed of her dismissal on 20-10-2020 while it is incorrect. Appellant was aware of dismissal from her job from the first day. Appellant misinformed to mention her story in order to save herself and want to gain favor. Similarly, the Departmental Appeal Appellant has filed on 20-11-2020.
8. Reply of Para No. 9 is that inquiries was conducted against the appellant in which her absence proves that the appellant has been rendering her services to the Punjab Government without any permission, even after completion of her tenure of deputation. This process of appellant is against the service rules. Who is not entitled to any relief.

**REPLY ON GROUNDS:**

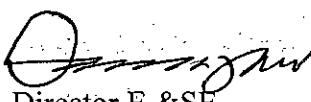
- a) Ground "a" of the appeal is incorrect. The conduct of answering respondents is in accordance with rules and law. The appellant provided her service to the department. However, according to the deputation policy, the appellant could be given deputation for 5 years, which the appellant rendered his services to the Punjab Government. Furthermore, on completion of her term of deputation, the appellant did not appear in Khyber Pakhtunkhwa, nor did he appear in Abbottabad district after that, nor did he make any request in this regard. This act of appellant is against the service rules.
- b) Reply of Para "b" of the ground is that, the appellant was treated in accordance with rules and law. The appellant was dismissed after fulfilling all the codal and legal requirements and after show cause notices were also served to appellant which was in accordance with the prevailing law.
- c) Para "c" of the ground is incorrect. The dismissal order was issued after completing all the coddle formalities.
- d) Para "d" of the ground is incorrect. Appellant was removed from services after fulfilling all legal formalities.
- e) Reply Para "e" of the ground is incorrect. It is submitted that the department has issued deputation order to the appellant in accordance with the Wedlock policy and with the prevailing law. However, the appellant did not pass the deputation order of the parents Department render her services voluntarily to the Government of Punjab continuously without any permission. Further stated that the appellant did not take any importance to her department. The appellant considered herself above the law and rules. The department fulfilled all the legal requirements and took action.
- f) Para "f" of the ground is incorrect just to pressurize the respondents to gain wrongful. Replied has already above in detail.
- g) Para "g" of the ground is correct to the extent that the Departmental appeal of the appellant was rejected. Detail reply has already been given in above Paras.

u

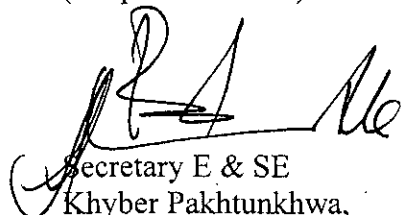
*It is therefore humbly prayed that in the light of foregoing comments the appeal may graciously be dismissed with cost.*

  
District Education Officer  
(Female) Abbottabad.

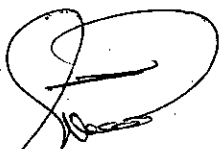
(Respondent No 3)

  
Director E & SE  
Peshawar.

(Respondent No 2)

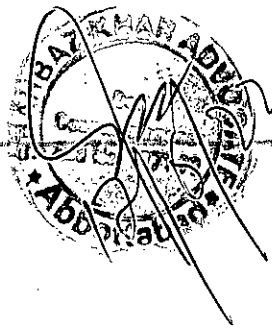
  
Secretary E & SE  
Khyber Pakhtunkhwa,  
Peshawar.

(Respondent No 1)

  
Through Representative

**AFFIDAVIT**

*Stated on oath that the contents of instant Para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.*



  
Respondent No 3

5 Annexure A

REMINDER-II

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR NO. 2154-68/F.No.105/F/All/District deputation Dated Peshawar the 15/12/2015

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To The District Education Officer, (Female) Shangla, Karak, Lakki, Haripur, Kohistan Battagram, DIKhan, Kohat, Peshawar, Mansehra, Nowshera, Abbottabad, Swabi, Chitral & Bannu. Mardan

Handwritten notes: EP 77, do the meeting, Am com, 20/12/2015

SUBJECT:- DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST DEFAULTERS DEPUTATIONIST OF (E&SED) KHYBER PAKHTUNKHWA

Memo:-

I am directed to inform you that this office has asked the information in the light of Admn: Department letter No.SO(PE)5-2/IPT/08/Battagram/2014 dated 03-04-2015, regarding disciplinary action against the teachers who has been on un-authorized deputation but the said requisite information has not been received to this office so far while the Admn; Deptt: has pressing hard for the same. Full detail given below:-

| S.No | Name of District | No of teachers on deputation | Information <sup>sent</sup> this office Endst.No & date | Remarks       |
|------|------------------|------------------------------|---|---------------|
| 1    | DEO(F) Shangla   | One                          | 3508 dated 22-05-015                                    | Copy attached |
| 2    | DEO(F) Karak     | One                          | 3509 dated 22-05-2015                                   | -do-          |
| 3    | DEO(F) Lakki     | One                          | 3510 dated 22-05-2015                                   | -do-          |
| 4    | DEO(F) Haripur   | four                         | 3511 dated 22-05-2015                                   | -do-          |
| 5    | DEO(F) Kohistan  | One                          | 3512 dated 22-05-2015                                   | -do-          |
| 6    | DEO(F) Battagram | One                          | 3513 dated 22-05-2015                                   | -do-          |
| 7    | DEO(F) DIKhan    | Five                         | 3514 dated 22-05-2015                                   | -do-          |
| 8    | DEO(F) Kohat     | four                         | 3516 dated 22-05-2015                                   | -do-          |
| 9    | DEO(F) Peshawar  | Six                          | 3518 dated 22-05-2015                                   | -do-          |
| 10   | DEO(F) Mansehra  | Five                         | 3520 dated 22-05-015                                    | -do-          |
| 11   | DEO(F) Mardan    | three                        | 3521 dated 22-05-2015                                   | -do-          |
| 12   | DEO(F) Nowshera  | Two                          | 3522 dated 22-05-2015                                   | -do-          |
| 13   | DEO(F) A.Abad    | forteen                      | 3524 dated 22-05-2015                                   | -do- ✓        |
| 14   | DEO(F) Swabi     | Two                          | 3526 dated 22-05-2015                                   | -do-          |
| 15   | DEO(F) Chitral   | three                        | 3528 dated 22-05-2015                                   | -do-          |
| 16   | DEO(F) Bannu     | eight                        | 3029 dated 20-05-2015                                   | -do-          |

Handwritten notes: 22/12/15, 15/12/15

You are once again directed to sent the requisite information to this office as soon as possible please.

Encis: As Above

Deputy Director Establishment(F) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Handwritten signature and date: 15/12/15

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No: \_\_\_\_\_/Deputation/EB-II

Dated: \_\_\_\_\_/9/2/2021

0992-342533, 0992-342314

Deofemale.abbottabad@gmail.com

OFFICE ORDER:

Consequence upon the recommendation of enquiry report in respect of Mst. Shehla Naz Ex-CT Govt: Girls High School Kuthiala Abbottabad, the removal from service Notification under Endst: No 9315-23/EB-II/Removal from Service dated Abbottabad the 05/11/2019 by undersigned is hereby remain intact.

District Education Officer  
(Female) Abbottabad

Endst: No 1738-40

Copy for information is forwarded to the:

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with reference letter No. 2966/F.No. 364/F/Appeal A.Abad dated Peshawar the 20/01/2021.
2. Shehla Naz Ex-CT GGHS Kuthiala.
3. Office record.

District Education Officer  
(Female) Abbottabad



385

~~1/1/16~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject: DEPUTATIONIST /DISCIPLINARY PROCEEDING UNDER E&D RULE 2011

Memo:

Reference your letter No .645-56/F.No. 105 /(F) and email dated 20/01/2016 the requisite information is submitted for your kind perusal and further necessary action please

1. The detail of Total Deputationist grade wise is as below

| Sr No | Name/Designation/School              | Grade | From       | To         | Absence Period                              | Action taken by DEO/SDEO   |
|-------|--------------------------------------|-------|------------|------------|---|--|
| 1     | Maryam Saba PST GGPS Banda Said Khan | 12    | 04-02-2015 | 04-02-2008 | She remain absent from 04-02-2008 till date | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.   |
| 2     | Mehnaz Gul PST GGPS Sali Kutla       | 12    | 15-09-2004 | 15-09-2007 | She remain absent 15-09-2007 till date      | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.   |
| 3     | Shehla Naz CT GGHS Bagnoter          | 15    | 24-08-2008 | 07-01-2011 | She remain absent from 07-01-2011 till date | Showcause notice issued by DEO (F) and sent to Director E&SE Peshawar to serve upon the teacher through concerned department where she presently working (Punjab Government) |
| 4     | Shahida Parveen PST GGPS Pehlwan     | 12    | 23-05-2009 | 23-05-2012 | She remain absent from 23-05-2012           | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.   |
| 5     | Farhat Bibi PST GGPS Romati          | 12    | 21-11-2008 | 21-11-2011 | She remain absent 21-11-2011                | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.   |
| 6     | Parveen Abbasi PST GGPS Khanispur    | 12    | 17-01-2009 | 17-01-2012 | She remain absent 17-                       | Final showcause by SDEO (Prim) in daily  |

8

229 148

|    |                                    |    |            |            |                                   |   |
|----|------------------------------------|----|------------|------------|-----------------------------------|---|
|    |                                    |    |            |            | 01-2012                           | Mashirq 29/06/2015 but still not joining her duty.  |
| 7  | Naheed AKhter CT GGHS Malikpura.   | 15 | 24-08-2005 | 23-08-2008 | She remain absent 23-08-2008      | Applied but not proceeded on Deputation   |
| 8  | Tasneem Kousar PST GGPS Pawa       | 12 | 1-9-1999   | 31-03-2009 | She remain absent 31-03-2009      | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.  |
| 9  | Salma Naz PST GGPS Banda Lamba     | 12 | 23-02-2010 | 23-02-2013 | She remain absent 23-02-2013      | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.  |
| 10 | Shaista Bibi PST GGPS Bagnoter     | 12 | 17-03-2010 | 17-03-2013 | She remain absent from 17-03-2013 | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 and joined her duty and posted at GGPS Nagri Bala  |
| 11 | Safia Bano PST GGPS Gali Meeran    | 12 | 24-02-2011 | 24-02-2014 | She remain absent 24-02-2014      | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 but still not joining her duty.  |
| 12 | Naila Bashir CT GGHS Bakote        | 15 | 10-09-2012 | 10-09-2013 | She remain absent 10-09-2013      | Showcause notice issued by DEO (F) and sent to Director E&SE Peshawar to serve upon the teacher through concerned department where she presently working (Federal Government) |
| 13 | Samina.Akhter PST GGPS Thora Kalan | 12 | 7-09-2010  | 6-09-2012  | She remain absent 06-09-2012      | Final showcause by SDEO (Prim) in daily Mashirq 29/06/2015 and joined her duty and posted at GGPS Iara Gora   |
| 14 | Zahida Bibi CT GGMS Bagan          | 15 | 02-07-2014 | 01-07-2016 |                                   | Period Not expired  |
| 15 | Farsia kanwal SS GGHS Dhamtour     | 17 | 31-05-2010 | 30-05-2013 | She remain absent 30-05-2013      | Disciplinary proceeding required to be initiated by Secretary and she is still absent   |
| 16 | Raj Gul Principal GGHS             | 19 | 15-09-2014 | 15-09-2017 |                                   | Period not expired  |

*Back to Parents Dept*

(19)

(13) (30)

|    |                                      |    |            |            |                                     |   |
|----|--------------------------------------|----|------------|------------|-------------------------------------|---|
|    | Havelian                             |    |            |            |                                     |   |
| 17 | Zahida Parveen SS GGHS<br>Hajia Gali | 17 | 04-04-2012 | 03-04-2015 | She remain<br>absent 03-<br>04-2015 | Disciplinary<br>proceeding required<br>to be initiated by<br>Secretary and she is<br>still absent |

Endst: No 1680-82 Dated 10/3 /2016

*Samina Abb*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

Copy to the:

1. SDEO Primary Abbottabad
2. Dealing Assistant EB-I Local Office
3. Dealing Assistant EB-II Local Office

*Samina Abb*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD



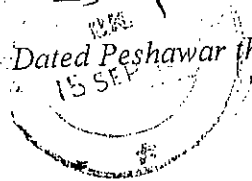
Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

AMEER

No. 57 / P. File. Shehla Naz CT/IPT

B

Dated Peshawar the 13/9 /2018.



The District Education Officer, (Female) Abbottabad

Subject:-

DISCIPLINARY PROCEEDING UNDER E&D RULES 2011 AGAINST DEFAULTERS DEPUTATION INST E&SE DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR

MS 197

I am directed to refer to your letter No. 8341 dated 02/07/2018 on the subject cited above and to ask you to submit latest position of the case <sup>as to</sup> either she has taken over charge on her new adjustment at GHSS, Kuthiala Abbottabad or otherwise.

Director (Female) Khyber Pakhtunkhwa

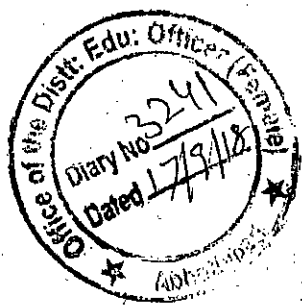
*[Signature]*  
Deputy Director Female (E&SE) Khyber Pakhtunkhwa.

*[Signature]*  
19/9/18

EB-II

for further  
19/9/18

*[Signature]*  
17/09/2018





Director of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

No. \_\_\_/F.No.105/(F)/All Districts Deputation

Dated Peshawar the 03/02/2015.

To

The Secretary to Govt. of  
Khyber Pakhtunkhwa (E&SE) Department.

Subject: DISCIPLINARY PROCEEDING UNDER E & D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

Memo:

In continuation of this office letter No.9 dated 1-1-2016, I am directed to enclose  
herewith the requisite report received from the following district Education Officer (Female) for  
further necessary action as desired please.

1. DEO(F) Battagram
2. DEO(F) Karak
3. DEO(F) Bannu
4. DEO(F) Haripur

Note:- The remaining information will be sent to your office as and when received from  
the DEOs concerned.

Endst. No. 645-56  
Copy to the:-

*[Signature]*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

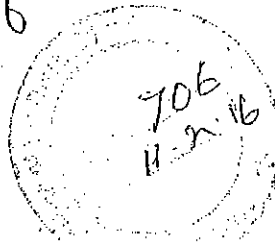
District Education Officers (Female) Shangla, Lakki, Kohistan DIKhan, Kohat  
Peshawar, Mansehra, Nowshera, Abbottabad, Swabi & Chitral you are once again directed to  
submit the requisite report to this office as soon as possible and also the reasons of delay may  
be clarified.

The Administration department is pressing hard for the same.

*[Signature]*  
31/2/16  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

EB  
Plz do the  
needful

*[Signature]*  
10/2/16



28/1/16

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 5341 /EB-II/IPT/Deputation

Dated 27 /2018

The Deputy Director (F)  
Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: DISCIPLINARY PROCEEDING UNDER E&D RULES 2011  
AGAINST DEFAULTERS DEPUTATIONIST (E&SE) DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR.

Memo:



Kindly refer to your office letter No. 596/P. File Shehla Naz CT/IPT dated Peshawar the 04/04/2018 and reminder issued vide your office letter No. 6482 /P. File Shehla Naz CT/IPT dated Peshawar the 30/03/2018, It is submitted that the said teacher is on illegal deputation at GGHS Shalimar Town Lahore.

In compliance of above letter she has been adjusted at CT post (BPS-15) at GGHS Kuthiala vide this office letter No. 5165-67 dated 25/06/2018.

The process of her regularization /sanction of unauthorized stay will be submitted after his arrival at new school.

Copies enclosed.

- 01. Adjustment order on the post of CT.
- 02. Application for adjustment order.
- 03. Adjustment order of Govt. of Punjab.
- 04. Application for extension in deputation period.

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

14

(111)  
(122)

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE ABBOTTABAD.

No. 11288/EB-II  
Dated 8/10 /2015

To

The Deputy Director (Female)  
(E&SE) Khyber Pakhtunkhwa Peshawar.

Subject: - DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST DEFAULTERS  
DEPUTATIONEST OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
KHYBER PAKHTUNKHWA.

Memo,

Kindly refer to your letter No.3524/F.No.105/(F) ALL Districts Deputation dated 22-05-2015. The information on the subject in respect of CT teachers at Sr: No.3,4 and 12 is noted against each as under:-

| S/N | Name & Designation.  | FROM       | TO         | Remarks.  |
|-----|--|------------|------------|---|
| 1   | Naheed Akhtar, SCT<br>BPS-16 GGHS<br>Malikpura Abbottabad. | 24-08-2005 | 23-08-2008 | She applied for deputation period w.e.f. 24-08-2005 TO 23-08-2008 at Federal Directorate of Education Islamabad but she had not proceeded on deputation period as per report of Principal GGHS Malikpura Abbottabad vide No.1632 dated 20-08-2015 she is still working. (Copy attached) |
| 2.  | Shehla Naz, CT GGHS<br>Bagnetar Abbottabad.                | 07-01-2008 | 07-01-2011 | She Proceeded on deputation period w.e.f 07-01-2008 to 07-01-2011 at (Punjab) Lahore. Neither she applied for extension in deputation period nor permanent absorption as per record of this office. She is absent.  |
| 3.  | Naila Bashir, CT GGHS<br>Bakote Abbottabad.                | 10-09-2012 | 10-09-2013 | She proceeded on deputation at Federal Directorate of Education Islamabad w.e.f.10-09-2012 to 10-09-2013. Neither she Applied for further extension nor permanent absorption. She is absent w.e.f. 10-09-2013 as per record of this office.   |

This Office may be guided as to whether the concerned Departments of the teachers at Sr:No.02 & 03 where they are working may be approached to submit detail report regarding their performance before taking disciplinary action against them or otherwise please.

*Saminah Altaf*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.



15  
Director of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

No. \_\_\_/F.No.105/(F)/All Districts Deputation

Dated Peshawar the 03/02/2016

To

The Secretary to Govt. of  
Khyber Pakhtunkhwa (E&SE) Department.

Subject: DISCIPLINARY PROCEEDING UNDER E & D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

Memo:

In continuation of this office letter No.9 dated 1-1-2016, I am directed to enclose  
herewith the requisite report received from the following district Education Officer (Female) for  
further necessary action as desired please.

1. DEO(F) Battagram
2. DEO(F) Karak
3. DEO(F) Bannu
4. DEO(F) Haripur

Note:- The remaining information will be sent to your office as and when received from  
the DEOs concerned.

Endst.No. 605-56  
Copy to the:-

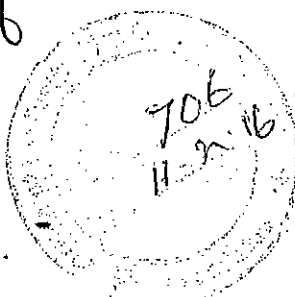
*[Signature]*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

District Education Officers (Female) Shangla, Lakki, Kohistan Dikhan, Kohat  
Peshawar, Marishehra, Nowshera, Abbottabad, Swabi & Chitral you are once again directed to  
submit the requisite report to this office as soon as possible and also the reasons of delay may  
be clarified.

The Administration department is pressing hard for the same.

*[Signature]*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

29/1/16



(6)

69

37

Director of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

No. /F.No.105/(F)/All Districts Deputation

Dated Peshawar the 03/02/2015.

To

The Secretary to Govt: of  
Khyber Pakhtunkhwa (E&SE) Department.

Subject

**DISCIPLINARY PROCEEDING UNDER E & D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

In continuation of this office letter No.9 dated 1-1-2016, I am directed to enclose  
herewith the requisite report received from the following district Education Officer (Female) for  
further necessary action as desired please.

1. DEO(F) Battagram
2. DEO(F) Karak
3. DEO(F) Bannu
4. DEO(F) Haripur

Note:- The remaining information will be sent to your office as and when received from  
the DEOs concerned.

*[Signature]*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

Endst:No. 6WS-56  
Copy to the:-

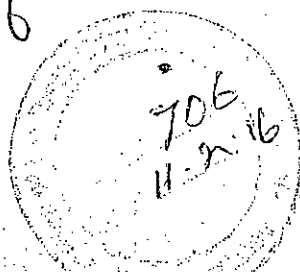
District Education Officers (Female) Shangla, Lakki, Kohistan DIKhan, Kohat  
Peshawar, Mansehra, Nowshera, Abbottabad, Swabi & Chitral you are once again directed to  
submit the requisite report to this office as soon as possible and also the reasons of delay may  
be clarified.

The Administration department is pressing hard for the same.

*[Signature]*  
31/2/16  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

EB  
Plz do the  
needful.

*[Signature]*  
10/2/16



28/1/16

17

(450)

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE ABBOTTABAD.

No. 112-BB/EB-II  
Dated 8/10/2015

To: The Deputy Director (Female)  
(E&SE) Khyber Pakhtunkhwa Peshawar.

Subject: - DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST DEFAULTERS  
DEPUTATIONEST OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
KHYBER PAKHTUNKHWA.

Memo,

Kindly refer to your letter No.3524/F.No.105/(F) ALL Districts Deputation dated 22-05-2015. The information on the subject in respect of CT teachers at Sr: No.3,4 and 12 is noted against each as under:-

| S/N<br>o. | Name & Designation   | FROM       | TO         | Remarks.  |
|-----------|--|------------|------------|---|
| 1         | Naheed Akhtar, SCT<br>BPS-16 GGHS<br>Malikpura Abbottabad. | 24-08-2005 | 23-08-2008 | She applied for deputation period w.e.f. 24-08-2005 TO 23-08-2008 at Federal Directorate of Education Islamabad but she had not proceeded on deputation period as per report of Principal GGHS Malikpura Abbottabad vide No.1632 dated 20-08-2015 she is still working. (Copy attached) |
| 2.        | Shehla Naz, CT GGHS<br>Bagnetar Abbottabad.                | 07-01-2008 | 07-01-2011 | She Proceeded on deputation period w.e.f 07-01-2008 to 07-01-2011 at (Punjab) Lahore. Neither she applied for extension in deputation period nor permanent absorption as per record of this office. She is absent.  |
| 3.        | Naila Bashir, CT GGHS<br>Bakote Abbottabad.                | 10-09-2012 | 10-09-2013 | She proceeded on deputation at Federal Directorate of Education Islamabad w.e.f.10-09-2012 to 10-09-2013. Neither she Applied for further extension nor permanent absorption. She is absent w.e.f. 10-09-2013 as per record of this office.   |

This Office may be guided as to whether the concerned Departments of the teachers at Sr:No.02 & 03 where they are working may be approached to submit detail report regarding their performance before taking disciplinary action against them or otherwise please.

*Saminah Khan*  
DISTRICT EDUCATION OFFICER  
(FEMALE).ABBOTTABAD.

19

(X)



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

No. SO(PE)5-2/IPT/08/Battagram  
Dated Peshawar the 03-11-2016

To  
The Director,  
Elementary & Secondary Education,  
Peshawar.

Subject: - DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT, KHYBER PAKHTUNKHWA

Dear Sir,  
I am directed to refer to this department letter of even number dated 03/04/2015, on the subject noted above in respect of Ms. Shehla Naz CT, GGHS Bagnotar, Abbottabad and to state that this department asked for conducting enquiry against a lady who is on unauthorized deputation but it is regretted to note that despite lapse of one and a half year no action has been taken so far..

In view of above, it is requested to do the needful and submit report within seven (07) days otherwise case will be reported to Secretary E&SE Department for corrective action.

Yours faithfully,

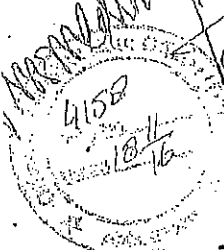
SECTION OFFICER (PRIMARY)

Endst: of even number & date:  
Copy to:

1. The District Education Officer (Female), District Abbottabad.
2. Ms. Shehla Naz CT, GGHS Bagnotar, Abbottabad.

SECTION OFFICER (PRIMARY)

*3B-II*  
*Memorandum/Reports*  
*Put up on*  
*Review with*  
*the views given*  
*to concerned party*  
*in memo dated*  
*19/11/16*



20

187

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) ABBOTTABAD

No. S/S7 /EB-II/Deputation Dated A/Abad the 3-5-2018.

To,

Shehla Naz, SVT  
GCHS Shalimar town,  
Lahore,

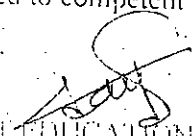
Subject:-

DISCIPLINARY PROCEEDING UNDER E&D RULES 2011  
AGAINST DEFAULTERS DEPUTATIONIST OF  
ELEMENTARY AND SECY EDUCATION DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR.

Memo:


Reference this office letter No 2666-67/EB-II Dated 18.04.2018 on  
the subject cited above.

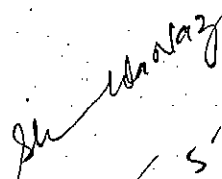
You are once again directed to attend this office within seven days  
after issuance of this letter, so that your case for regularization/sanction of un-authorized  
stay at Government of Punjab could be submitted to competent authority for decision.

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) ABBOTTABAD

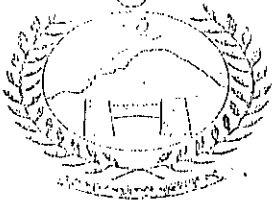
Even No. & Dates

Copy for information to the Deputy Director (Female) Elementary & Secondary  
Education Khyber Pakhtunkhwa Peshawar.

  
DISTRICT EDUCATION OFFICER,  
(FEMALE) ABBOTTABAD

  
21-5-18

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



0992-342533, 0992-342314

deofemale\_abbottabad@gmail.com

*Handwritten marks and a circled number '21'.*

To,

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

**SUBJECT:- DISCIPLINARY PROCEEDING UNDER E & D RULES 2011 AGAINST DEFAULTERS  
DEPUTATION INST E&SE DEPARTMENT KHYBER PAKHTUNKHAWA PESHAWAR**

Memo:

Kindly refer to your letter No *57/P* File Shehla Naz CT/IPT dated Peshawar the 13.09.2018 on the subject cited above and it is informed to you that the teacher concerned has not taken over charge at GGHS Kuthiala Abbottabad up till now.

Therefore, the case is submitted for further necessary action please.

*Handwritten signature*  
District Education Officer  
(Female) Abbottabad

Endst: NO. 7845-47 /EBII/Adj:Trans:

Dated A/Aad the 3/11/ /2018.

Copy for information to the:-

1. Shehla Naz EST GGHS Shalimar town Lahore.
2. Principal GGHS Shalimar town Lahore.
3. Office record.

*Handwritten notes:*  
7/11/18  
Hafizur Rehman  
Director

*Handwritten signature*  
District Education Officer  
(Female) Abbottabad

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



22

No. 8261 /EB-II  
Dated 30/12/2016

0992-342533, 0992-342314  
deofemale.abbottabad@gmail.com

To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

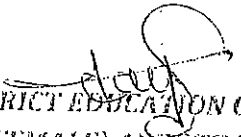
Subject: DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT, KHYBERPAKHTUNKHWA.

Memo,

Kindly refer to your letter No.3524/F.No.105/(F)All Districts Deputation dated 22-05-2015, Endst:No.645-56Dated 03-02-2015, last letter No.3898 dated 22-09-2016 & Section Officer letter No.SO(PI)5-02/IP1/08/Battagram Dated 03-11-2016 addressed to your good self & copy there of Endst: to this office in respect of the case of Shehla Naz, Ex-CT GGHS Bagnotar Abbottabad directing this office to submit report for submission to Secretary E&SED for necessary action.

In this connection it is submitted that in compliance of your good self directions contained in letter No.3524 dated 22-05-2015 and No.2154-68 dated 15-12-2015, a show cause Notice was sent to Directorate of E&SE Peshawar vide No.750 dated 11-02-2016 (copy attached) requesting that the Said Show Cause Notice may be served upon Mst. Shehla Naz, Ex-CT through the concerned Secretary of Punjab Govt: Lahore where she is presently working. The teacher concerned visited this office, collected copy of show cause notice and submitted reply after elapse of about 09 months on 26-11-2016 received in this office on 08-12-2016 alongwith request for extension in deputation period (copies attached).

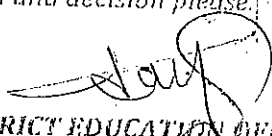
It is pointed out that the teacher concerned proceeded on Deputation w.e.f. 24-08-2008 to 07-01-2011 and after expiry of Deputation period she had to join the post but she failed to do so. She rendered the service w.e.f. 07-01-2011 to date without sanction of Deputation period which comes to about 06 years. Therefore the case is submitted before your good self for consideration and decision please.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

8262

Endst: No. /EB-II/  
Dated 30/12/2016

Copy to the Section Officer Primary Govt: of Khyber Pakhtunkhwa E&SED Peshawar with reference to his letter No.SO (PE)5-2/IP1/08/Battagram dated 03-11-2016 for information alongwith copies of the above referred letter for consideration and decision please.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

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



No. 2661/EB-II

Dated: 18 /04/2018



0992-342533, 0992-342314



deofemale\_abbottabad@yahoo.com

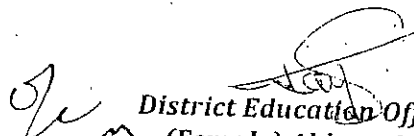
To

Shehla Naz, SVT  
GGHS Shalimar Town  
Lahore.

**SUBJECT: DISCIPLINARY PROCEEDING UNDER E&D RULES 2011 AGAINST DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR.**

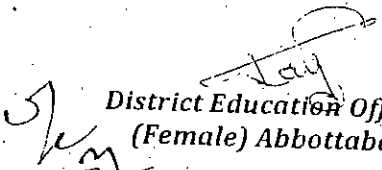
Memo:

The Director E&SE Khyber Pakhtunkhwa Peshawar vide his No.596/P. File Shehla Naz, CT/IPT dated 04-04-2017 has directed to this office to inform the teacher concerned to submit arrival/join her duty so that your case for regularization /sanction of un-authorized stay at Government of Punjab could be submitted to competent authority for decision please.

  
District Education Officer  
(Female) Abbottabad

Even No. & Date:-

Copy for information to the Deputy Director (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

  
District Education Officer  
(Female) Abbottabad



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24

377  
24

Director of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

No. \_\_\_/F.No.105/(F)/All Districts Deputation

Dated Peshawar the 03/02/2016

To

The Secretary to Govt. of  
Khyber Pakhtunkhwa-(E&SE) Department.

Subject **DISCIPLINARY PROCEEDING UNDER E & D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

In continuation of this office letter No.9 dated 1-1-2016, I am directed to enclose  
herewith the requisite report received from the following district Education Officer (Female) for  
further necessary action as desired please.

1. DEO(F) Battagram
2. DEO(F) Karak
3. DEO(F) Bannu
4. DEO(F) Haripur

Note:- The remaining information will be sent to your office as and when received from  
the DEOs concerned.

*[Signature]*

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

Endst.No. 645-56  
Copy to the:-

District Education Officers (Female) Shangla, Lakki, Kohistan DIKhan, Kohat  
Peshawar, Marishehra, Nowshera, Abbottabad, Swabi & Chitral you are once again directed to  
submit the requisite report to this office as soon as possible and also the reasons of delay may  
be clarified.

The Administration department is pressing hard for the same.

*[Signature]*  
31/2/16  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

28/1/16

EB  
Plz do the  
needful

10/2/16

706  
11-2-16



*(Handwritten signature)*

*(Handwritten signature)*  
*(Handwritten number 25)*

GOVERNMENT OF NWFP  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No. SO(PE)5-2/02/IPT/Abbottabad/Vol.II

Dated Peshawar the 15-4-2009.

To,

The Executive District Officer  
Elementary & Secondary Education  
Abbottabad.

Subject:- ORDER OF DEPUTATION FOR INTER PROVINCIAL  
TRANSFER ON DEPUTATION TO PUNJAB IN RESPECT OF  
MST. SHEHLA NAZ CT.

I am directed to refer to the subject noted above and to enclose herewith order No. SO(SE-IV)8-36/2007 dated 28-2-2009 of the Govt. of Punjab School Education Department regarding Inter Provincial Transfer on deputation basis of Mst. Shehla Naz CT GGHS Bagnotar Abbottabad for information and further necessary action.

*(Handwritten signature)*

(ARIF JAMIL)  
SECTION OFFICER (PRIMARY)

Encls. as above.

Copy forwarded to the Director Elementary & Secondary Education NWFP Peshawar along with a copy of the above order for information.

/  
SECTION OFFICER (PRIMARY)

(26) (131)

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE ABBOTTABAD.

No. 11283/EB-II

Dated 8/10 /2015

To

The Deputy Director (Female)  
(E&SE) Khyber Pakhtunkhwa Peshawar.

Subject: -

DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST DEFAULTERS  
DEPUTATIONEST OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
KHYBER PAKHTUNKHWA.

Memo;

Kindly refer to your letter No.3524/F.No.105/(F) ALL Districts Deputation dated 22-05-2015. The information on the subject in respect of CT teachers at Sr: No.3,4 and 12 is noted against each as under:-

| S/N<br>o | Name & Designation   | FROM       | TO         | Remarks.  |
|----------|--|------------|------------|---|
| 1        | Naheed Akhtar, SCT<br>BPS-16 GGHS<br>Malikpura Abbottabad. | 24-08-2005 | 23-08-2008 | She applied for deputation period w.e.f. 24-08-2005 TO 23-08-2008 at Federal Directorate of Education Islamabad but she had not proceeded on deputation period as per report of Principal GGHS Malikpura Abbottabad vide No.1632 dated 20-08-2015 she is still working. (Copy attached) |
| 2.       | Shehla Naz, CT GGHS<br>Bagnetar Abbottabad.                | 07-01-2008 | 07-01-2011 | She Proceeded on deputation period w.e.f 07-01-2008 to 07-01-2011 at (Punjab) Lahore. Neither she applied for extension in deputation period nor permanent absorption as per record of this office. She is absent.  |
| 3.       | Naila Bashir, CT GGHS<br>Bakote Abbottabad.                | 10-09-2012 | 10-09-2013 | She proceeded on deputation at Federal Directorate of Education Islamabad w.e.f.10-09-2012 to 10-09-2013. Neither she Applied for further extension nor permanent absorption. She is absent w.e.f. 10-09-2013 as per record of this office.   |

This Office may be guided as to whether the concerned Departments of the teachers at Sr:No.02 & 03 where they are working may be approached to submit detail report regarding their performance before taking disciplinary action against them or otherwise please.

*Saminat*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.

*[Handwritten scribble]*

1. Engh.
2. Writ

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*[Handwritten signature]*



OFFICE OF THE HEAD MISTRESS GOVT GIRLS HIGH SCHOOL BAGNOTAR ABBOTTABAD

No: 95 / Dated 19/09 / 2015

To,

The District Education Officer,  
Female Abbottabad.


Subject: DEPUTATION

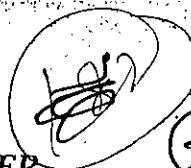

Memo:

It is is for your kind information that Mst: Shela Naz, CT has been deputed at Govt Girls High School Shalimar Town Lahore (Punjab) vide nletter No: So(PE)5-2/02/IPT/Abbottabad /Vol.II dated 15.04.2009 by section Officer Govt of NWFP Elementary and Secondary Education Department Peshawar and relieved Off from her duty on 21.04.2009. All available relevant documents are enclosed for further necessary action please.

- |                       |           |
|-----------------------|-----------|
| 1. Relieving Chit     | Photocopy |
| 2. Charge report      | ..do..    |
| 3. Copy of order      | ..do..    |
| 4. Punjab Govt Letter | ..do..    |

*[Handwritten signature]*  
Headmistress  
Govt Girls High School-  
Bagnetar Abbottabad  
Head Mistress  
Govt. Girls High Sch.  
Bagnetar, Abbottabad

  
POST AVAILABILITY CERTIFICATE OF THE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION (FEMALE) ABBOTTABAD.

I have no objection to the transfer of Mst: Yasmin Begum .. against post of SCT BPS-16 at GMS Kokol barseen District Abbottabad.. It is also certified that no NOC has been issued to any other person against this post.


Name of DEO (Female) ATD **Faiza Shafi**

Signature \_\_\_\_\_

Endst: No. 829

Dated 29-1-18

Stamp \_\_\_\_\_

  
District Education Officer  
(Female) Abbottabad

**District Education Officer**  
**(Female) Abbottabad**

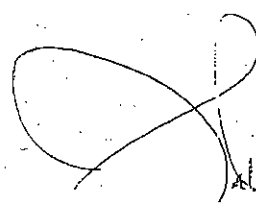
No: 43 / Dated 28/05/2017

To,  
The District Education Officer,  
Female Abbottabad.

Subject: NO VACANT POST

Memo:

It is for your kind information that Mst: Shela Naz, CT has been deputed/transfer at Govt Girls High School Shalimar Town Lahore (Punjab) vide letter No: SO(PE)5-2/02/IPT/Abbottabad/Vol.II dated 15.04.2009 and relieved off from this school on 21.04.2009. Now there is no such any CT post is vacant in this school.

  
Headmistress

Govt Girls High School  
Bagnotar, Abbottabad  
Headmistress  
Govt Girls High School  
Bagnotar Abbottabad

D/Asstt  
EB-II  
for file  
Mr. Mr.  
02/05/2018

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 2166-17/EB-II

Dated: 18/04/2017



0992-342533, 0992-342314

deofemale\_abbottabad@yahoo.com

To

Shehla Naz, SVT  
GGHS Shalimar Town  
Lahore.

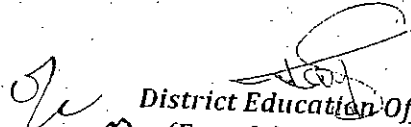
**SUBJECT:** DISCIPLINARY PROCEEDING UNDER E&D RULES 2011 AGAINST DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR.

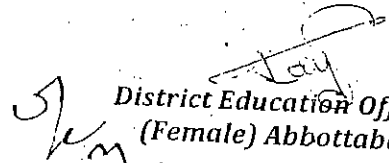
Memo:

The Director E&SE Khyber Pakhtunkhwa Peshawar vide his No.596/P. File Shehla Naz, CT/IPT dated 04-04-2017 has directed to this office to inform the teacher concerned to submit arrival/join her duty so that your case for regularization /sanction of un-authorized stay at Government of Punjab could be submitted to competent authority for decision please.

Even No. & Date:-

Copy for information to the Deputy Director (Female) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

  
District Education Officer  
(Female) Abbottabad

  
District Education Officer  
(Female) Abbottabad

The District Education Officer,  
(Female) Abbottabad

Subject **DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.**

I am directed to refer to the letter No. SO (PE)5-2/IPT/08/Battagram/2014 dated 03-04-2015 received from Section Officer (Primary) (E&SE) Khyber Pakhtunkhwa in respect of the following teachers who has been on un-authorized deputation since the period mentioned against each.

| S.No. | Name & Designation                   | From       | To         | Absence Period                              |
|-------|--------------------------------------|------------|------------|---|
| 1.    | Maryam Saba PST GGPS Banda Said Khan | 4-2-2005   | 4-2-2008   | She remain absent from 4-2-2008 till date   |
| 2     | Mehnaz Gul PST GGPS Sali Kutla       | 15-9-2004  | 15-9-2007  | She remain absent from 15-7-2007 till date  |
| 3.    | Naheed Akhtar CT GGHS Malikpura      | 24-8-2005  | 23-8-2008  | She remain absent from 23-8-2008 till date  |
| 4.    | Shehla Naz CT GGHS Bagnotar          | 7-1-2008   | 7-1-2011   | She remain absent from 7-1-2011 till date   |
| 5.    | Shahida Parveen PST GGPS Pehlavan    | 23-5-2009  | 23-5-2012  | She remain absent from 23-5-2012 till date  |
| 6.    | Farhat Bibi PST GGPS Romatti         | 21-11-2008 | 21-11-2011 | She remain absent from 21-11-2011 till date |
| 7.    | Parveen Abbasi PST GGPS Khanispur    | 17-1-2009  | 17-1-2012  | She remain absent from 17-1-2012 till date  |
| 8.    | Tasneem Kausar PST GGPS Pawa         | 1-9-1999   | 31-3-2009  | She remain absent from 31-3-2009 till date  |
| 9.    | Salma Naz PST GGPS Banda Lumva       | 23-2-2010  | 23-2-2013  | She remain absent from 23-2-2013 till date  |
| 10    | Shaista Bibi PST GGPS Begnotar       | 17-3-2010  | 17-3-2013  | She remain absent from 17-3-2013 till date  |
| 11    | Safia Bano PST GGPS Gali Meran       | 24-2-2011  | 24-2-2014  | She remain absent from 24-2-2014 till date  |
| 12    | Naila Bashir CT GGHS Bakote          | 10-9-2012  | 10-9-2013  | She remain absent from 10-9-2013 till date  |
| 13    | Shahida Parveen PST GGPS Pehlavan    | 23-5-2009  | 23-5-2012  | She remain absent from 23-5-2012 till date  |
| 14    | Samina Akhtar PST GGPS Thora Kalan   | 7-9-2010   | 6-9-2012   | She remain absent from 6-9-2012 till date   |

Therefore I am directed to state that disciplinary action may be initiated against them under E&D Rules immediately under intimation to this directorate.

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

Endst: No. 3525

Copy to the:-

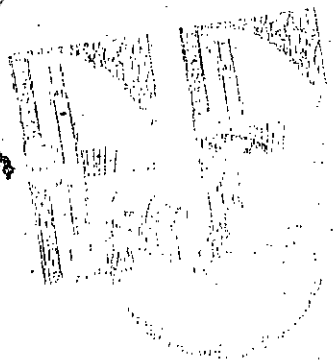
1. Section Officer (Prim:) E&SED Khyber Pakhtunkhwa w/o to his No & dated cited above.

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,



~~32~~

32



Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

No. 57 / P-Fite. Shehla Naz CT/IPT

Dated Peshawar the 13/9 /2018.

To

The District Education Officer,  
(Female) Abbottabad

Subject:- DISCIPLINARY PROCEEDING UNDER E&D RULES 2011 AGAINST DEFAULTERS  
DEPUTATION INST E&SE DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR

I am directed to refer to your letter No. 5341 dated 02/07/2018 on the subject  
cited above and to ask you to submit latest position of the case either she has taken over charge  
on her new adjustment at GHSS, Kuthiala Abbottabad or otherwise.

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,

*Handwritten signature and date: 11/9/18*

*Handwritten notes:*  
15-11  
for further  
11/9/18  
17/09/2018

Office of the Distt. Educ. Officer  
Ditry No. 3241  
Dated 17/9/18

*[Handwritten mark]*

*[Handwritten mark]*

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*[Handwritten mark]*

Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Peshawar

No. 6482 /F.No. Shehla Naz CT/IPT

Dated Peshawar the 20/3 /2018.

Reminder-1

To

The District Education Officer,  
(Female) Abbottabad

Subject:-

DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST  
DEFAULTERS DEPUTATION OF ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT KHYBER PAKHTUNKIWA.

I am directed to refer to this office letter No. 596 dated 04-04-2017 on the subject  
cited above and to inform you that the reply of the case has not been received in this office so  
far.

You are once again directed to submit reply of the case to this Directorate for  
further necessary action.

*[Signature]*  
Assistant Director -II  
(E&SE) Khyber Pakhtunkhwa  
28/3/18 29/3

D/ASST, ER-II

for further process

*[Handwritten mark]*

*[Handwritten mark]*

05/04/2018

Office of the Distt. Edu. Officer  
Way No. 1354  
Dated 5/4/18  
4

34

To  
The District Education Officer,  
(Female) Abbottabad

Subject DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

I am directed to refer to this office letter No. 3524 dated 22-5-2015 on the subject cited above and to ask you once again to submit consolidated report in respect of the following teachers who have been on un-authorize deputation since the period mentioned against each.

| S.No. | Name & Designation                     | From       | To         | Absence Period                              |
|-------|--|------------|------------|---|
| 1.    | Maryam Saba (PST) GGPS Banda Said Khan | 4-2-2005   | 4-2-2008   | She remain absent from 4-2-2008 till date   |
| 2.    | Mehmaz Gul (PST) GGPS Sali Kulla       | 15-9-2004  | 15-9-2007  | She remain absent from 15-7-2007 till date  |
| 3.    | Naheed Akhtar CT GGHS Malikpura        | 24-8-2005  | 23-8-2008  | She remain absent from 23-8-2008 till date  |
| 4.    | Shehla Naz CT GGHS Bagnotar            | 7-1-2008   | 7-1-2011   | She remain absent from 7-1-2011 till date   |
| 5.    | Shahida Parveen (PST) GGPS Pehlawan    | 23-5-2009  | 23-5-2012  | She remain absent from 23-5-2012 till date  |
| 6.    | Farhat Bibi (PST) GGPS Romatti         | 21-11-2008 | 21-11-2011 | She remain absent from 21-11-2011 till date |
| 7.    | Parveen Abbasi (PST) GGPS Khanispur    | 17-1-2009  | 17-1-2012  | She remain absent from 17-1-2012 till date  |
| 8.    | Tasneem Kausar (PST) GGPS Pawa         | 1-9-1999   | 31-3-2009  | She remain absent from 31-3-2009 till date  |
| 9.    | Salma Naz (PST) GGPS Banda Lumya       | 23-2-2010  | 23-2-2013  | She remain absent from 23-2-2013 till date  |
| 10.   | Shoista Bibi (PST) GGPS Begnotar       | 17-3-2010  | 17-3-2013  | She remain absent from 17-3-2013 till date  |
| 11.   | Safia Bano (PST) GGPS Gali Meran       | 24-2-2011  | 24-2-2014  | She remain absent from 24-2-2014 till date  |
| 12.   | Naila Bashir CT GGHS Bakote            | 10-9-2012  | 10-9-2013  | She remain absent from 10-9-2013 till date  |
| 13.   | Shahida Parveen (PST) GGPS Pehlawan    | 23-5-2009  | 23-5-2012  | She remain absent from 23-5-2012 till date  |
| 14.   | Samina Akhtar (PST) GGPS Thora Kalan   | 7-9-2010   | 6-9-2012   | She remain absent from 6-9-2012 till date   |

Therefore, you are directed to take disciplinary action against them under E&D Rules 2011 immediately under intimation to this directorate for onward submission to the Administration Department. Your are further directed that if any teachers took over charge or report back to her parent department may be submit her report separately.

*[Signature]*  
31/11/16  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa.

Encl: No. \_\_\_\_\_  
Copy to the:-  
1. Section Officer (Prim.) E&SED Khyber Pakhtunkhwa.

*[Signature]*  
7/12/16  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa.

*[Handwritten notes and signatures]*

*[Handwritten notes and signatures]*

*[Circular stamp with handwritten number 3433 and date 27/11]*

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*[Handwritten signature]*

*[Handwritten signature]*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
No. SO(PE)5-2/IPT/03/Battagram  
Dated Peshawar the 03-11-2016

To

The Director,  
Elementary & Secondary Education,  
Peshawar.

Subject: - DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 AGAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT, KHYBER PAKHTUNKHWA

Dear Sir,

I am directed to refer to this department letter of even number dated 03/04/2015, on the subject noted above in respect of Ms. Shehla Naz CT, GGHS Bagnotar, Abbottabad and to state that this department asked for conducting enquiry against a lady who is on unauthorized deputation but it is regretted to note that despite lapse of one and a half year no action has been taken so far.

In view of above, it is requested to do the needful and submit report within seven (07) days otherwise case will be reported to Secretary E&SE Department for corrective action.

Yours faithfully,

SECTION OFFICER (PRIMARY)

Encl: of even number & date:  
Copy to:

- 1. The District Education Officer (Female), District Abbottabad.
- 2. Ms. Shehla Naz CT, GGHS Bagnotar, Abbottabad.

*[Handwritten signature]*

SECTION OFFICER (PRIMARY)

*[Handwritten notes and signatures]*  
41522

*[Handwritten signature]*

*[Handwritten initials]*

Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa, Pesh:

No. 596 /P.File Shehla NazCT/IPT

Dated Peshawar the 4/4 /2017.

36

To

The District Education Officer,  
(Female) Abbottabad

Subject

DISCIPLINARY PROCEEDINGS UNDER E&D RULES 2011 GAAINST  
DEFAULTERS DEPUTATIONIST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

I am directed to refer to your letter No. 8261 dated 30-12-2016 on the  
subject cited above and to ask you to inform the teacher concerned to submit  
arrival/join her duty in her parent department immediately and after adjustment then  
process her case for regularization/sanction of unauthorized stay in Govt. of Punjab  
for onward submission to Admn: Department please.

*[Handwritten signature]*  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa

*[Handwritten signature]*  
30/3/2017

*subdt*  
*P/2 to inform all doing*  
*the D/A for*  
*- the needful regarding*  
*- the subject*  
*[Handwritten signature]*  
*7/4/17*

Office of the Distt. Edu. Officer (Female)  
Deputy No. 937  
Dated 7/4/17  
Abbottabad

OFFICE OF THE DISTRICT EDUCATION

OFFICER (FEMALE) ABBOTTABAD

PH# No. 0992-342533 FAX: 0992-342314

Email address: [abbottabad@abbottabad.gov.pk](mailto:abbottabad@abbottabad.gov.pk)

No: 5165-67 EB-II/Transf,Adjst Dated: 25 /06/2018

ADJUSTMENT

Consequent upon the approval of competent authority, Mst:Shehla Naz Ex-CT Government Girls High School Bagnoter return from Deputation is hereby adjusted at Government Girls Higher secondary School Kuthiala Abbottabad against the vacant post of CT on her own pay and grade in the interest of public service with effect from the dated of taking over charge on the following terms and conditions.

1. The teacher will have to join this post within (30 days) after issuance of this letter.
2. The teacher is directed to provide your service documents i.e Service Book, I.P.C service record w.e.f 07.01.2008 till now at the time of joining the post.
3. If the teacher failed to join the post within stipulated period it will be presumed that she is not interested to retain parent department.
4. The deputation period which has not been extended by the authority w.e.f 7.1.2011 to date of joining will be decided/included in service subject to the approval of competent authority with the consent of Punjab Government

District Education Officer  
(Female) Abbottabad

Even No. & Date:-

Copy for information to the:-

1, Director (E&SE) Khyber Pakhtunkhwa Peshawar with reference his letter No.596/P.File Shihzela Naz CT/IPT dated Peshawar the 04.04.2017.

2. Shela Naz EST GGHS Shalimar town Lahore.

3. Principal GGHS Shalimar Town Lahore, with the remarks that to please relieve the teacher concerned alongwith all service documents.

District Education Officer  
(Female) Abbottabad

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

5511 /EB-II/IPT/Deputation

Dated 27/7/2018

38

The Deputy Director (F)  
Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: DISCIPLINARY PROCEEDING UNDER E&D RULES 2011  
AGAINST DEFAULTERS DEPUTATIONIST (E&SE) DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR.

Memo:

Kindly refer to your office letter No. 596/P. File Shehla Naz CT/IPT dated Peshawar the 04/04/2018 and reminder issued vide your office letter No. 6482 /P. File Shehla Naz CT/IPT dated Peshawar the 30/03/2018, It is submitted that the said teacher is on illegal deputation at GGHS Shalimar Town Lahore.

In compliance of above letter she has been adjusted at CT post (BPS-15) at GGHSS Kuthiala vide this office letter No. 5165-67 dated 25/06/2018.

The process of her regularization /sanction of unauthorized stay will be submitted after his arrival at new school.

Copies enclosed.

01. Adjustment order on the post of CT.
02. Application for adjustment order.
03. Adjustment order of Govt: of Punjab.
04. Application for extension in deputation period.

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

No. 9061-63 /EB-II

Dated 11-01-2015

To

1. The Principal  
GGHSS Malikpura Atd.
2. The Headmistress  
GGHS Bagnotar Atd.
- ✓ 3. Head Mistress GGHS Bakot Atd.

Subject:-

DISCIPLINARY PROCEEDINGS UNDER E.S.D. RULES 2011 AGAINST  
DEFAULTERS DEPARTMENTAL ONEST OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

Memo.

A copy of letter No. 5524/F No. 105/(F)/All District Deputation dated 22-05-2015 from Directorate of Elementary & Secondary Education Peshawar, is sent herewith with the direction to intimate this office as to whether the following teachers at Sr.No. 3, 4 & 12 remained absent from duty/ proceeded on Deputation period or currently performing their duty in the school regularly. The report must reach in this office within 3 days positively for submission to competent authority.

1. Naheed Akhtar, CT GGHSS Malikpura Atd.
2. Shehla Naz, CT GGHS Bagnotar Atd.
3. Naila Bashir, CT GGHS Bakot Atd.

This may be treated as non-urgent.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.



The Deputy Director (F)  
Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: DISCIPLINARY PROCEEDING UNDER E&D RULES 2011  
AGAINST DEFAULTERS DEPUTATIONIST (E&SE) DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR.

Memo:

Kindly refer to your office letter No. 596/P. File Shehla Naz CT/IPT dated Peshawar the 04/04/2018 and reminder issued vide your office letter No. 6482 /P. File Shehla Naz CT/IPT dated Peshawar the 30/03/2018, It is submitted that the said teacher is on illegal deputation at GGHS Shalimar Town Lahore.

In compliance of above letter she has been adjusted at CT post (BPS-15) at GGHS Kuthiala vide this office letter No. 5165-67 dated 25/06/2018. The process of her regularization /sanction of unauthorized stay will be submitted after his arrival at new school.

Copies enclosed.

- 01. Adjustment order on the post of CT.
- 02. Application for adjustment order.
- 03. Adjustment order of Govt. of Punjab.
- 04. Application for extension in deputation period.

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

*Oliver*

*Handwritten notes at the bottom of the page*

# CORRIGENDUM

In compliance with reference to the Advertisement published in daily J ang and daily Aaj dated 16th June, 2019 for developmental schemes in Galiyat, the competent authority has accorded the following changes.

1. The deadline for submission and opening of tenders is extended to 15.07.2019.
2. All the Contractors participating in the tenders must register with Khyber Pakhtunkhwa Revenue Authority (KPRA).
3. The distinct agreement time will be 15 days instead of 07 days.

The other terms and conditions already advertised in above mentioned news papers in the best interest of public service.

گلیات ڈیولپمنٹ اسکیم کے تحت تعمیراتی کاموں کے لیے کھلی بیڑا دعوت نامہ کی تاریخیں اور شرائط کے متعلق اصلاحی نوٹ

گلیات ڈیولپمنٹ اسکیم کے تحت تعمیراتی کاموں کے لیے کھلی بیڑا دعوت نامہ کی تاریخیں اور شرائط کے متعلق اصلاحی نوٹ

| Sl. No. | Contract Description             | Estimate | Actual    | Contract Value |
|---------|----------------------------------|----------|-----------|----------------|
| 1       | کابل لائن کی تعمیر و مرمت کے لیے | 29000/-  | 1450000/- | 1450000/-      |
| 2       | کابل لائن کی تعمیر و مرمت کے لیے | 49000/-  | 2450000/- | 2450000/-      |
| 3       | کابل لائن کی تعمیر و مرمت کے لیے | 80300/-  | 4015000/- | 4015000/-      |
| 4       | کابل لائن کی تعمیر و مرمت کے لیے | 8000/-   | 400000/-  | 400000/-       |
| 5       | کابل لائن کی تعمیر و مرمت کے لیے | 6000/-   | 300,000/- | 300,000/-      |
| 6       | کابل لائن کی تعمیر و مرمت کے لیے | 4000/-   | 200,000/- | 200,000/-      |
| 7       | کابل لائن کی تعمیر و مرمت کے لیے | 6000/-   | 300000/-  | 300000/-       |

1. Tender BOQ is available on www.gda.gkp.pk
2. BOQ is available on www.gda.gkp.pk
3. BOQ is available on www.gda.gkp.pk
4. BOQ is available on www.gda.gkp.pk
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8. BOQ is available on www.gda.gkp.pk
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18. BOQ is available on www.gda.gkp.pk
19. BOQ is available on www.gda.gkp.pk

گلیات ڈیولپمنٹ اسکیم کے تحت تعمیراتی کاموں کے لیے کھلی بیڑا دعوت نامہ کی تاریخیں اور شرائط کے متعلق اصلاحی نوٹ

## SPORTS

Advertisement for sports equipment and services.

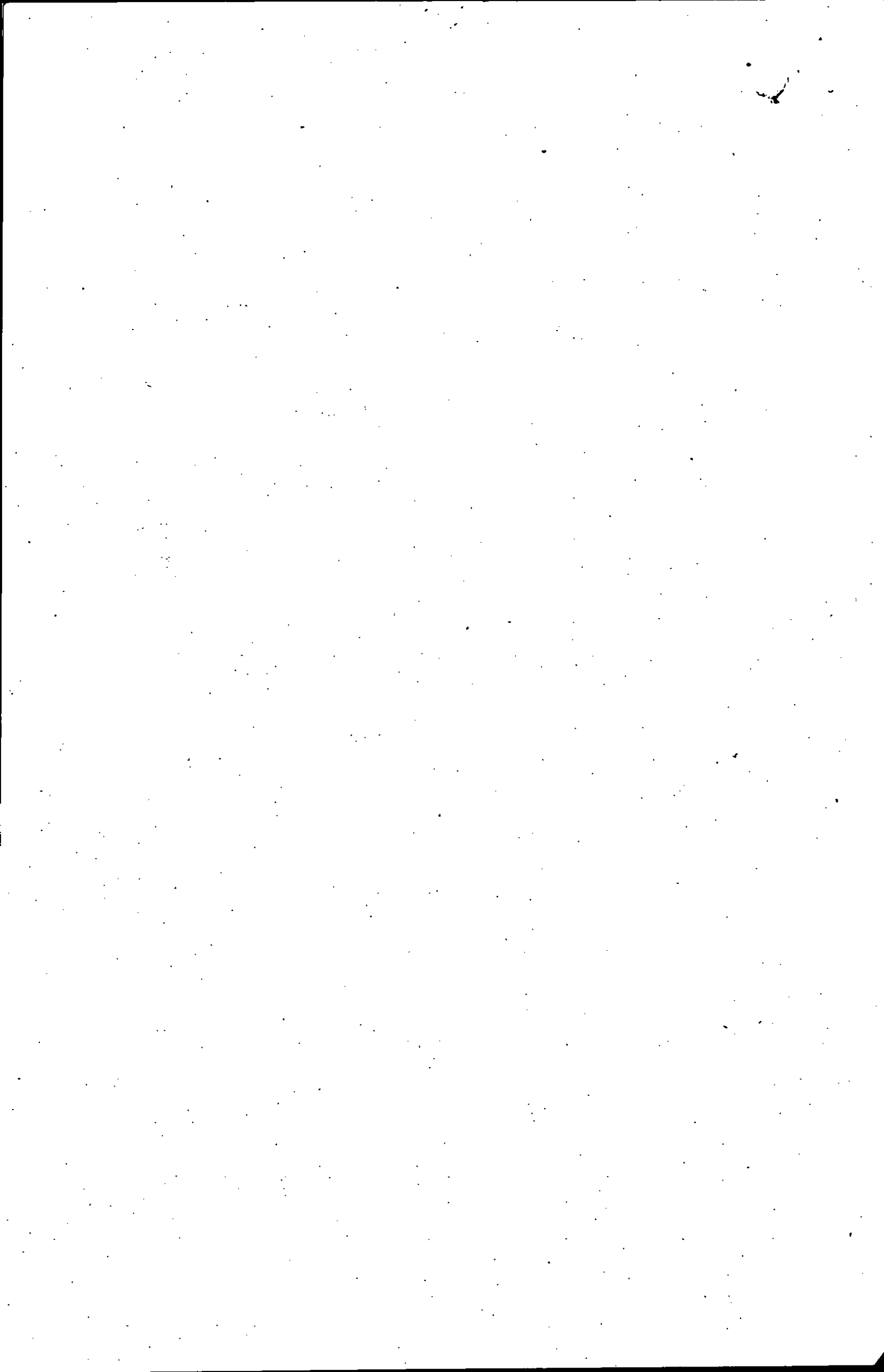
### Public Notice

Advertisement regarding public notice and services.

### Public Notice

Advertisement regarding public notice and services.

Dated 28-07-2019



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



0992-342533, 0992-342314

deofemale.abbottabad@yahoo.com

No. 658 /EB-II Show caus

Dated A/Abad the 19/01/2019

**SHOW CAUSE NOTICE**

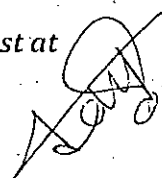
I Faiza Shafi District Education Officer (Female) Abbottabad as competent Authority under Khyber-Pakhtunkhwa Government servants (Efficiency & Discipline rule 2011), do hereby serve upon you Mst:Shehla Naz EST GGHS Shalimar Town Lahore under transfer CT post at GGHS Kuthiala A/Abad show cause notice as follows:-

**ALLEGATIONS.**

1. - You were proceeded on deputation and after the expiry of deputation period at your own request you were posted at GGHS Kuthiala against the vacant post of CT vide this office Endst: No.5165-67 dated 25.06.2018. You neither joined your duty at GGHS Kuthiala nor intimated to the office of the undersigned regarding your willful absence from duty.
2. In exercise of the power conferred upon by Khyber Paktunkhwa Government Servant (Efficiency & Discipline rule 2011), I being competent Authority and in pursuance of the letter No.242 dated 28.12.2018 served upon you with the instant show cause notice with the direction to submit reply within 15 days after receipt of this show cause notice as to why the following penalties as defined in rule 04(b) IV ibid should not be imposed upon you and also intimate whether you desired to be heard in person.
  - i) Removal from Services.
  - ii) Stoppage of two increments.
3. In case if you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-party decision will be taken against you under the rules ibid

**MST: Shahla Naz EST**

**GGHS Shalimar Town Lahore Under transfer CT post at  
GGHS Kuthiala Abbottabad**

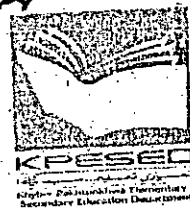
  
**COMPETENT AUTHORITY**

Annexure C

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**DISTRICT EDUCATION OFFICE (FEMALE)**  
**MANSEHRA**

© [deofmanshra@yahoo.com](mailto:deofmanshra@yahoo.com)



Dated: 31/12/2020

The Director  
Elementary & Secondary Education Department, Peshawar.

**INQUIRY REPORT**

OBJECT:-

Respected Sir

Reference your notification No. 5734-36/F.No. 364 (F) Appeal Abbottabad dated Peshawar the 03/11/2020 regarding appeal in respect of Shehla Naz Ex-CT GGHS Kuthiala District Abbottabad.

1. Place of Inquiry:- DISTRICT EDUCATION OFFICE (FEMALE) ABBOTTABAD

2. Background:- Mst: Shehla Naz Ex-CT who was on deputation w.e.f. 07/04/2009 to 07/04/2012 for the period of three years to Punjab Province. After the expiry of her deputation period i.e. 08/04/2012 she has not joined her original school at District Abbottabad & remained absent from duty. The DEO (F) Abbottabad has removed her from service on 05/11/2019 after fulfilling codal formalities.

3. Procedure:-

After receiving a letter of nomination as inquiry officer, the undersigned dispatched a letter to District Education Officer (Female) Abbottabad vide No. 9370 Dated 05/11/2020 with the request to make all the concerned officers/officials available in her office on 11/11/2020 along with the relevant record to inquire the matter. The inquiry proceedings were conducted on 11/11/2020 & 02/12/2020 at the office of DEO (F) Office Abbottabad. The following documents were found present:-

- 1. Behaha Yasmeen District Education Officer (Female) Abbottabad.
- 2. Dealing Assistant
- 3. Shehla Naz Ex-CT

4. Findings:

1. On the request of Mst: Shahlā Naz Ex-CT for transfer on deputation to Punjab, through letter issued by Government of NWFP Peshawar vide No. SO (PE) 5-2/203/07/Shehala Naz CT dated 15/08/2007 to the Secretary to Govt: for Education Department Punjab for the purpose of NOC (No Objection Certificate) (Annexure-I)

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- Secretary to Govt: for Education Department Punjab issued NOC vide No. SO (SE-IV) 8-36/07 Dated 29/09/2007 with condition at S # No. VI showing that " the period of deputation is three years". (Annexure-II)
- After completion of all codal formalities, the Secretary to Govt: for Education Department Punjab issued her transfer on deputation basis through order vide No. SO (SE-IV) 8-36/2007 Dated 28/02/2009 for the period of three years (Annexure-III) & further posting/adjustment order issued by Executive District Officer (Edu) City District Govt: Lahore vide No. 3695 Dated 07/04/2009 (Annexure-IV) at GGHS Shalimar Town.
- Mst: Shahla Naz Ex-CT was relieved from GGHS Bagnotar District Abbottabad on 21/04/2009 for performing her duty at Punjab. (Annexure-V)
- After the expiry of deputation period i.e. 08/04/2012, the teacher concerned did not join her original School of District Abbottabad, instead of submitting applications her parent department (KPK) for further extension in deputation period, she approached different forms i.e. Chief Minister/Secretary to Govt: for Education Department Punjab etc.
- During the over stay of Mst: Shahla Naz Ex-CT in Punjab, the DEO (Female) Abbottabad showed her as absent from duty and in this regard correspondence was made with Director E&SE KPK Peshawar for guidance/action through letter No. (Director letters) 3524 Dated 22/05/2015 (DEO letters) 11288 Dated 08/10/2015, 1680-82 Dated 10/03/2016, 8261 Dated 30/12/2016. (Annexure-VI to IX). The DEO (F) Abbottabad issued show cause notice to Mst: Shahla Naz Ex-CT vide No. 750 Dated 11/02/2016. (Annexure-X) Mst: Shahla Naz Ex-CT did not reply to this show cause notice, however after elapse of 10 months she submitted reply with the request to extend the period or further adjustment at near by home. (Annexure-XI) She submitted different applications to District Education Officer (F) Abbottabad for further adjustment in different schools on 25/05/2017, 27/03/2018, 03/06/ 2018 at GGHS Bagnotar, GGHS Aziz Bang, GGMS Nagaki (Annexure-XII). She also filed an appeal in respect of Director E&SE KPK Peshawar on 03/06/2018 which was sent to DEO (F) Abbottabad through letter No. 3394 Dated 19/06/2018 for further action (Annexure-XIV)
- In the light of the order by Director E&SE KPK Peshawar, the DEO (F) Abbottabad issued the letters No. 2666-67 Dated 18/04/2018 & 5157 Dated 09/05/2018 (Annexure-XV) to Shahla Naz Ex-CT to join her duty at District Abbottabad, so that her case could be submitted to the competent authority for regularization/sanction of un-authorized stay at Punjab, but she has failed to do so.
- DLO (F) Abbottabad has also adjusted the said teacher at GGHSS Kuthiala against vacant post vide No. 5165-67 Dated 25/06/2018 with the condition that her deputation period which has not been extended by the concerned authority will be decided subject to the approval of competent authority with the consent of Punjab government (Annexure-XVI), & the teacher concerned has joined the school on 01/07/2018. (Annexure-XVII)
- The DEO (F) Abbottabad has informed the Director E&SE KPK through letter issued on 02/07/2018 about her adjustment and also regularization of unauthorized stay in Punjab. (Annexure-XVIII)
- After the arrival of Mst: Shahla Naz Ex-CT in district Abbottabad dated 01/07/2018, she again remained absent from duty and submitted an application in the name of DEO (F) Abbottabad

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- for extension of arrival date in the school as the authority of Punjab has not relieved her. The said application not found in the record of office file. (Annexure-XIX)
11. The DEO (F) Abbottabad has again informed the Director E&SE KPK Peshawar through letter No: 7845-47 Dated 03/11/2018 about her absence from duty: (Annexure-XX) & issued a show cause notice vide No. 658 Dated 19/01/2019 (Annexure-XXI) which was sent to Director E&SE KPK Peshawar through letter No. 658 Dated 19/01/2019 to take up with concerned authority of Punjab. In continuation an absent notice has been published through "new paper daily Sarhad" on 28/06/2019 (Annexure-XXII). Mst: Shahla Naz Ex-CT stated that she did not have any information about show cause notice & published notice in new papers.
  12. Hence due to non-availability of reply in stipulated period, the DEO (F) Abbottabad has imposed major penalty and issued her removal from service order vide No. 9315-23 Dated 05/11/2019. (Annexure-XXIII)
  13. Mst: Shehla Naz Ex-CT during the inquiry shared the different correspondence in terms of letters/applications with Govt: of Punjab to get favour from parent department (Annexure-12 nos), but in fact her this act shows that she deceived the parent department.
5. On analyzing the documents on record & personal statement of the concerned teacher, as well as discussions it appeared that:

1. Initially the teacher concerned got deputation for a period of three years i.e. 07/04/2009 to 07/04/2012.
2. She should have contacted the parent department for further extension in deputation period before expiry of deputation period, but she remained silent. However she started unnecessary correspondence with the Govt: of Punjab for further extension despite knowing that her job status was not clear in her parent department (KPK).
3. Government of KPK gave her an opportunity despite her long absence from job on expiry of deputation period, but she played hide and seek with the parent department by making herself available at school at GGHS Kuthiala on 01/07/2018 and again remaining absent.
4. She wasted precious time of DEO (F) Abbottabad as well as Director Elementary & Secondary Education KPK Peshawar.
5. Her application for further extension on 01/07/2018 after joining GGHS Kuthiala seems bogus as it is not found in office record of DEO (F) Abbottabad.

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6. Recommendations

After going through the written responses & detailed discussions with all the concerned, the undersigned has come up with the following recommendations:-

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Her removal from service order issued by DEO (F) Abbottabad under Endstt: NO. 5165-67 dated 05/11/2019 is a right decision under E&D rules as she remained willful absent from parent department on expiry of deputation period.

In every deputation case the deputationest do not came back to parent department on expiry of deputation period which makes their job status unclear. There should be a proper procedure of taking oath on legal paper that they will inform their parent department six month before expiry of deputation period. In case of failure disciplinary action would be initiated against them considering them absent from duty.

*Naghmana Sardar*  
31/12/2020  
NAGHMANA SARDAR  
DISTRICT EDUCATION OFFICER (FEMALE)  
MANSEHRA/ INQUIRY OFFICER



~~Amir~~ 46 (137)

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

**SHOW CAUSE NOTICE**

Whereas I, Samina Altaf DEO (F) Abbottabad as competent authority under the Khyber Pakhtunkhwa Peshawar, Govt: servant (Efficiency & Discipline) Rules 2011, do hereby serve upon you MST; Shehla Naz, Ex- CT GGHS Bagnotar Abbottabad now posted on Deputation at GGHS Shalimar Town (E&SED) Govt: of Punjab Lahore, show cause notice as follows:-

**ALLEGATION:**

1. You were proceeded on deputation at Government of Punjab E&SED (Lahore) for a period of 04 years w.e.f. 07-01-2008 to 07-01-2011. After expiry of Deputation period neither you join parent department nor applied for Extension of Deputation period after elapse of 05 years which is gross misconduct on your part and therefore you are liable to be proceeded under E&D rule 2011.
- 2.) In exercise of the power conferred upon by Khyber Pakhtunkhwa Govt: Servant (Efficiency & Discipline) Rules-2011, I being competent authority and in pursuance of the directions of Directorate of E&SE Khyber Pakhtunkhwa Peshawar contained in letter No.3524/F.No.105 (F) Dated 22-05-2015 read with letter No.2154-68 dated 15-12-2015 served you with the instant show cause notice with the directions to submit reply within 15 days of the receipt of this notice as to why the penalties as defined in rule 4 (a) & (b) ibid should not be imposed upon you and also intimate whether you desire to be heard in person.
- 3.) In case if you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-part decision will be taken against you under the rules ibid.

SHEHLA NAZ EX-CT  
GGHS BAGNOTER District Abbottabad  
Now posted on Deputation at GGHS Shalimar  
Town Lahore (Punjab).

*Samina Altaf*  
COMPETENT AUTHORITY

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The District Education Officer  
(Female) Abbottabad

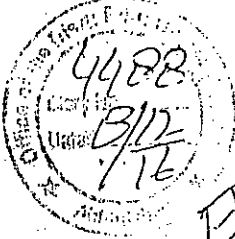
SUBJECT: REPLY OF SHOW CAUSE NOTICE IN R/O SHEHLA NAZ EX-CT TEACHER GGHS BAGNOTAR DEPUTED NOW AT GGHS SHALIMAR TOWN LAHORE

Respected Madam

With reference to your Show Cause Notice bearing No 250/EB-II Dated 11/02/2016 my reply is as under

1. That, I was appointed as CT Teacher in Education Department and performing my duties for last 22 years without any complaints, and with full devotion and honesty
2. That, my husband is employee of WAPDA at Lahore .He is serving there for at least 20 years
3. That after the Marriage appellant served in District Abbottabad quite well and full devotion.
4. That due to domestic and family matters appellant apply for deputation where her husband is serving in WAPDA at Lahore .As per spious policy appellant
5. deputation request accepted vide Letter No SO (PE) 5-2/203/07 schools. Appellant was deputed at GGHS Shalimar Lahore from GGHS Bagnotar Abbottabad.
6. That, after the legal process appellant took charge at GGHS Shalimar Town Lahore. and work quite efficiently and honestly.
7. That after long time appellant was informed through letter No : SO(PE) 5-2/PT/08 Dated 03/04/2016 that her deputation period was expired , No other Notice except than this received regarding expiry of deputation
8. That the appellant's husband is still serving at Lahore in WAPDA at the Children of the appellant also studying there, whole of appellant family settled in Lahore.
9. That, after receiving Letter appellant again filled appeal/application for extension of deputation which annexed.
10. That appellant after the deputation remained at GGHS Shalimar till now. In this regard mistake has not committed by me. My record is critical clear
11. That as per spious policy deputation period of appellant extended or otherwise adjusted nearly as possible

Therefore it is requested to your good honour may please be withdraw Show Cause Notice and extend my deputation as per policy be extention to the period of appellant or adjusted nearly as per as policy. Appellant worked continuously there, it's not wilful absence of appellant .I shall be very thankful to you.



EB-II

Process with P/Paper for consideration  
Dated 11/11/16

Shehla Naz  
Ex-CT  
GGHS Bagnotar  
District Abbottabad  
26/11/16

Presently deputed  
GGHS Shalimar Town  
Lahore

D (48)  
Annexure

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



☎ 0992-342533, 0992-342314  
✉ [deofemale\\_abbottabad@yahoo.com](mailto:deofemale_abbottabad@yahoo.com)

No. 658 /EB-II Show cause dated A/Abad the 19/07 /2019

To,

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

SUBJECT: -

WILL FULL ABSENT FROM DUTY/SHOW CAUSE NOTICE

Memo:

Enclosed please find herewith show cause notice (in duplicate) on account of absence from duty in respect of Mst: Shahla Naz CT GGHSS Kuthiala Abbottabad (now posted on Deputation at GGHS Shalimar Town Lahore (E&SED) Punjab Government Lahore. It is requested that the Instant show cause notice may please be served upon the accused teacher through concerned secretary of the Punjab Government (E&SED) Lahore and second copy of the said notice may also be returned to this office duly signed by the accused teacher as token of receipt for record and further necessary action please.

DISTRICT EDUCATION OFFICER,  
(FEMALE) ABBOTTABAD.



0992-342533, 0992-342314



Deofemale.abbottabad@gmail.com

No. 750 / EB-II

Dated: 11/2 /2016

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To

The Director  
E&SE Khyber Pakhtunkhwa Peshawar.

**SUBJECT:- WILL FULL ABSENCE FROM DUTY/ SHOW CAUSE NOTICE.**  
Memo,

Enclosed please find herewith Show Cause Notice (in duplicate) on account of absence from duty in respect of Mst: Shehla Naz Ex-CT GGHS Bagnoter Abbottabad(now posted on Deputation at GGHS Shalimar Town (E&SED) Punjab Govt: Lahore. It is requested that the instant show cause Notice may please be served upon the accused teacher through concerned Secretary of the Punjab Govt: (E&SED)Lahore and second copy of the said notice may also be returned to this office duly signed by the accused teacher as a token of receipt for record and further necessary action please.

*Seminat Altaj*  
District Education Officer  
(Female) Abbottabad