

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1208/2020

BEFORE: MRS. ROZINA REHMAN ... MEMBER(J)
MISS FAREEHA PAUL ... MEMBER(E)

Mst. Muzamil Bibi, Ex-PST Teacher D/O Wakeel Khan W/O
Muhammad Rafiq R/O Mohallah Aziz Abad, Shinwari, Post office
Zargari Tehil Thall District, Hangu. (Appellant)

Versus

1. District Education Officer (Female), Hangu.
2. Sub Divisional Education Officer (Female), Primary Thall, Hangu.
3. District Accounts Officer, District Hangu.
4. Director Education Elementary & Secondary Education
Department, Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Government of Khyber Pakhtunkhwa, Elementary &
Secondary Education Department, Peshawar (Respondents)

Mr. Muhammad Ilyas Orakzai,
Advocate

For appellant

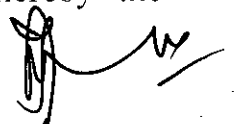
Mr. Naseerud Din Shah,
Assistant Advocate General

For respondents

Date of Institution.....26.02.2020
Date of Hearing.....16.11.2022
Date of Decision..... 16.11.2022

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has
been instituted under Section 4 of the Khyber Pakhtunkhwa Service
Tribunal Act, 1974 against the order dated 26.10.2019 whereby the



appellant was removed from service with the prayer that on acceptance of the appeal, the impugned order might be set aside and the appellant might be reinstated in service with all back benefits.

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as Primary School Teacher in the year 2004 and rendered 15 years service to the department. She submitted an application for maternity leave to respondent No. 1, which was allowed and the appellant was granted maternity leave till 07.10.2018. After completion of the leave, the appellant resumed her duty but her salaries were stopped by the respondents from October, 2018 for which she submitted an application but in vain. The appellant performed her duty in a very critical and tense situation as the school in which she was posted was situated in an area which was badly affected by terrorism in the district, Hangu. In the month of March, 2019, the appellant suffered from sciatica and lower backache and was unable to perform her duty for which the doctor advised her complete bed rest till her recovery. She submitted an application alongwith medical prescriptions to respondent No. 1 for leave which was not considered and instead the impugned order of removal dated 26.10.2019 was passed. The appellant submitted a representation to respondent No. 4 on 25.11.2019 on which no order was passed; hence this appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the

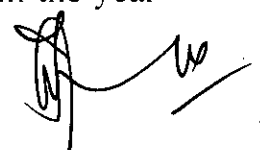


appellant as well as the learned Additional Advocate General for the respondents and perused the case file with connected documents in detail.

4. Learned counsel for the appellant contended that the removal order dated 26.10.2019 was illegal and unlawful because the appellant was not served with any show cause notice and that no proper/regular enquiry was conducted. He further contended that no opportunity of personal hearing was granted to the appellant and moreover, the order was passed with a retrospective effect. He requested that the appeal might be accepted as prayed for.

5. The learned Assistant Advocate General, on the other hand, stated before the Bench that after completion of her maternity leave in the month of October, 2018, the appellant was reported absent by the IMU, Hangu w.e.f. 17.10.2018. He further stated that the appellant was willfully absent from duty and that three absence notices were issued under registered cover on her home address with the direction to report for duty and when she failed to comply, a show cause notice in "Daily Ajj" was also issued on 09.10.2019. Learned AAG contended that the appellant should have submitted her appeal to the next higher authority which was the Director, Elementary & Secondary Education, but she did not do so. He requested that the appeal might be dismissed.

6. In view of the record and arguments presented before this bench, it transpires that the appellant availed maternity leave of 90 days in the year



2018. Her post-natal maternity leave expired on 07.10.2018 as per a maternity leave certificate available with the main appeal. No application for the leave or its sanction has been provided with the record, however the department in its reply admits that her maternity leave completed in October, 2018 but she was reported absent by the IMU Hangu w.e.f. 17.10.2018. Record provided with the reply indicates that notices of absence had been issued to the appellant at her home address on 28.05.2019 and school address on 13.09.2019 and 21.09.2019 as well as in a local newspaper on 09.10.2019 but she failed to resume her duties. Departmental representative stated that her salary was stopped w.e.f. 01.12.2018 because of her absence, for release of which an application of the appellant addressed to DEO (F) District Hangu dated 22.01.2019 is available with the main appeal. When confronted whether she attended her duty in 2019 it was revealed that she had the problem of sciatica for which she submitted an application which was available with the appeal, but no sanction for that leave is available on record.

7. Keeping in view the above discussion, we are of the view that if we set aside the period of maternity leave in 2018, which expired in October of that year, the appellant was absent from her duty for a major period without intimation, except one application, and without having her leave sanctioned from the competent authority. Such an act of a civil servant, without any doubt, is misconduct on his/her part.




8. In view of above, the appeal in hand is dismissed. Parties are left to bear their own costs. Consign.

9. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 16th day of November, 2022.*



(ROZINA REHMAN)
Member (J)



(FAREEHA PAUL)
Member (E)

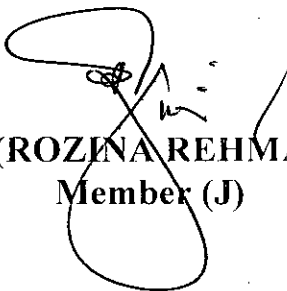
Service Appeal No. 1208/2020

Mr. Muhammad Ilyas Orakzai, Advocate for appellant present.

Mr. Naseerud Din Shah, Assistant Advocate General for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgement containing 05 pages, we are of the view that if we set aside the period of maternity leave in 2018, which expired in October of that year, the appellant was absent from her duty for a major period without intimation, except one application, and without having her leave sanctioned from the competent authority. Such an act of a civil servant, without any doubt, is misconduct on his/her part. In view of above, the appeal in hand is dismissed. Parties are left to bear their own costs. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 16th day of November, 2022.*


(ROZINA REHMAN)
Member (J)


(FAREEHA PAUL)
Member (E)

27.06.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents No. 3 & 5 are still awaited. Previous date was changed on Reader Note, therefore, notices be issued to the respondents No. 3 & 5 through registered post and last chance given for submission of reply/comments. In case the last chance as given is not availed, the next adjournment shall be subject to prior payment of cost of Rs. 5000/- to the appellant. Adjourned. To come up for submission of reply/comments on behalf of respondents No. 3 & 5 as well as arguments on 18.08.2022 before the D.B.

Respondent (3) was out district while Respondent No (5) was put on Notice



(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member (J)

18-8-22

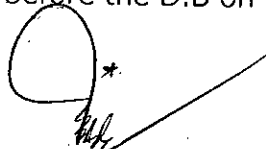
Due to summer vacation the case is adjourned to 10.10.22 for the same.



10.10.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Painsakhel, Assistant Advocate General for the respondents present.

The case was though fixed for arguments, however, reply/comments on behalf of respondents No. 3 & 5 have not yet been submitted so far, therefore, their right for submission of reply/comments thus stands struck off. Adjourned. To come up for arguments before the D.B on 16.11.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

8-3-22

Due to retirement of the Honble
Chairman the case is adjourned to
27-6-22

Shah
Redden

4.5.2021

Due to absence of
the 2.9.2021 for the


08.02.2021

Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Yaqoob Khan Assistant for respondents No.1, 2 & 4 present.

3-22
Chairman The case is adjourned to

27-6-22
Reply on behalf of respondents No.1, 2 & 4 is already placed on file. Learned counsel for appellant submitted rejoinder to reply of the said respondents. Written reply on behalf of respondents No.3 & 5 is still awaited. Representatives of respondents No.3 & 5 is not in attendance. Learned A.A.G requested for time to furnish reply on behalf of respondents No.3 & 5. Last chance is given. Case is posted to D.B for arguments, for 04.05.2021.



(Rozina Rehman)
Member (J)

4.5.2021
Due to COVID-19 the case is adjourned to 2.9.2021 for the same.

02.09.2021

Mr. Muhammad Ilyas Orakzai, Advocate, for the appellant present. Mr. Sahib Noor, ADEO alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned Additional Advocate General sought further time for submission of reply on behalf of respondents No. 3 & 5. Last opportunity given. To come up for reply on behalf of respondents No. 3 & 5 before the D.B on 29.11.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

29.11.2021 Due to unavailability of DB, the case is adjourned to 08-03-2022.

A. M.
Reader

28.10.2020

Nemo for appellant.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Muhammad Yaqoob Assistant for respondents present.

Written reply on behalf of respondents is still awaited. Representative of respondents seeks adjournment in order to submit reply/comments. Opportunity is granted. To come up for written reply/comments on 23.12.2020 before S.B.



(Rozina Rehman)
Member (J)

23.12.2020

Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Muhammad Yaqoob Assistant representative of respondents No.1, 2 & 4 present.

Written reply was submitted on behalf of respondents No.1 2 & 4. Learned A.A.G made a request for time to furnish reply on behalf of respondents No.3 & 5. Last chance is given. To come up for reply/comments on 08.02.2021 before S.B.



(Rozina Rehman)
Member (J)

08.07.2020

Counsel for the appellant present. Arguments heard and record perused.

Contends that the appellant was appointed as PST Teacher in the year 2004. She applied for maternity leave which was allowed till 07.10.2018. She resumed her duty but her salary was stopped. She then got Sciatica in March, 2019 and her request for leave was not considered rather she was removed from service. She was not served with any show cause notice and was condemned unheard, hence the present appeal.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal exceptions. The appellant is directed to deposit security and process fee within 10 days. Notice be issued to the respondents. To come up for written reply/comments on 03.09.2020 before S.B.

Appellant Deposited
Security & Process Fee

08/07/20

Member (J)

03.09.2020

Junior to counsel for the appellant and Addl. AG alongwith Muhammad Yaqub Assistant for the respondents present.

Representative of respondents seeks time to furnish reply/comments. Adjourned to 28.10.2020 on which date the requisite reply/comments shall positively be furnished.


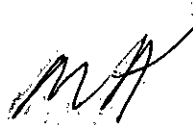


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1208 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/02/2020	<p>The appeal of Mst. Muzammil Bibi presented today by Mr. Muhammad Ilyas Orakzai Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p> REGISTRAR 26/2/2020</p>
2-	02/03/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/04/2020</u></p> <p> MEMBER</p>
13.04.2020		<p>Due to public holiday on account of COVID-19, the case is adjourned to 08.07.2020 for the same. To come up for the same as before S.B.</p> <p> Reader</p>

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No:- 1208 -P/2020

Case No. 1334
Dated 26/2/2020

Mst: Muzamil Bibi, Ex-PST Teacher D/o Wakeel Khan, W/o
Muhammad Rafiq R/o Mohallah Aziz Abad, Shinawari, P/o Zargari,
Tehsil Thall District Hangu
..... Appellant

Versus

- ✓ 1. District Education Officer (Female) Hangu
- ✓ 2. Sub Divisional Education Officer (Female), Primary Thall, Hangu
3. District Account Officer District Hangu
- ✓ 4. Director Education Elementary & Secondary Education Department
Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Government of Khyber Pakhtunkhwa, Elementary &
Secondary Education Department, KPK, Peshawar
..... Respondents

Filed to-day

Registrar
26/2/2020

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1974 R/W KHYBER
PAKHTUNKHWA E&D RULES, 2011 AGAINST THE IMPUGNED
ORDER DATED 26/10/2019, WHEREBY THE APPELLANT
HAS BEEN REMOVED FROM HER SERVICE.

Prayer in Appeal:

On acceptance of this Appeal the impugned removal order dated 26/10/2019 passed by respondent No 1 may kindly be set aside and the appellant may kindly be re-instated in service with all back benefits with such other relief as may deemed fit in the circumstances of the case may also be granted and respondent may kindly be directed to pay the outstanding salaries withheld by the respondents from the month of October, 2018.

Respectfully Sheweth:-

1. That the appellant was appointed as PST Teacher in the year, 2004 since then she was performing her duties with full devotion and honesty and she rendered 15 years services to the department.
2. That the appellant submitted an application for maternity leave to the respondent No 1, which was allowed and the appellant was granted maternity leave till 07/10/2018. (Copy of application and medical certificate are attached as annexure "A").
3. That after completion of maternity leave, the appellant resumed her duty, but instead of her duties, the salaries of the appellant was stopped by the respondents from October, 2018, for the release of her salary, the appellant submitted an application, but in vain. (Copy of application is attached as annexure "B").

4. That the appellant performed her duty in a very critical and tense situation, because the school of the appellant is situated in hard and badly effected terrorism area of District Hangu, moreover, the Chowkidar of the said school was also retired in the year, 2016, she was the only teacher in the said school without any other colleagues and Chowkidar performed her duty during these period, some threatening letter were thrown in the said school and so many times the locks of doors and cupboards were also broken by the unknown culprits, which creates fear amongst the students and appellant and against the above situation, the appellant submitted some applications to the respondents for providing security to the school in the shape of Chowkidar, but the respdonetns made no response of that application. (Copy of applications are attached as annexure "C").

5. That in the month of March, 2019 the appellant suffered from diseases sciatica lower backache and was unable to perform her duty, because the Doctor advise complete bed rest till the recovery, due to which the appellant submitted the application alongwith medical treatment to the respondent No 1 for leave. (Copy of application and medical treatment are attached as annexure "D").

6. That the respondent No 1 did not consider her leave application for which she is entitled and without fulfill codel formalities passed the impugned removal order dated 26/10/2019. (Copy of removal order is attached as annexure "E").
7. That against the said impugned removal order dated 26/10/2019 the appellant submitted representation to respondent No 4 through DD No 1476 on 25/11/2019, but till now no order has been passed by the respondent No 4. (Copy of representation is attached as annexure "F").
8. That the appellant further aggrieved from the impugned order as well as the act of the respondent No 4, hence the instant Service Appeal inter alia on the following grounds:-

Grounds:-

- A. That the impugned removal order dated 26/10/2019 is illegal void, unlawful, without lawful authority and ineffective upon the rights of appellant, hence need to be set aside.
- B. That the impugned order of respondent No 1 is illegal non speaking order, ambiguous as the appellant was not served with any show cause notice nor proper/regular inquiry was conducted, so the appellant was condemned unheard.

- C. That the impugned order is illegal, against the law void ab-initio, as the executive/departmental authority has no power to pass the order with retrospective effect on this score alone, the impugned order of respondent No 1 is liable to be set aside.
- D. That all the proceedings initiated against the appellant based on malafide and malicious and purportedly were initiated in order to displace the appellant from her post and appoint any other blue eyed.
- E. That prior to the issuance of impugned removal order no meaning full /purpose full chance of personal hearing was granted to the appellant, the impugned order is against the principles of natural justice.
- F. That the impugned order is in violation of Section 24-A of General Clause Act as the competent authority has failed to site any reason or justification in the said order.
- G. That it is well established principles of natural justice enshrined in the precedents of superior courts as well that where the competent authority is going to impose any penalty etc the regular inquiry to that effect is necessary.

H. That the appellant was not willfully absent from her duties, but her absence was due to above mentioned illness.

I. That during her entire service period the appellant performed her duties with full devotion and honesty and no single complaint etc have been filed against the appellant in this regard the appellant's punishment in the shape of removal from service is very harsh and major one, hence liable to be set aside.

J. That the instant appeal is within time and this Honourable Tribunal has the jurisdiction to entertain the instant appeal.

K. That any other grounds will be raised at the time of arguments with kind permission of this Honourable Tribunal.

It is, therefore, humbly prayed that on acceptance of this Appeal the impugned removal order dated 26/10/2019 passed by respondent No 1 may kindly be set aside and the appellant may kindly be re-instated in service with all back benefits with such other relief as may deemed fit in the circumstances of the case may also be granted and respondent may kindly be directed to pay the outstanding

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salaries withheld by the respondents from the month of
October, 2018.

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

Dated:- 26/02/2020

Through:-

&

Asrar

Appellant

Asrar

Muhammad Ilyas Orakzai
Advocate High Court
Peshawar.

Shabir

Muhammad Shabir Khalil
Advocate High Court
Peshawar.



حکومت صاحب ڈسٹرکٹ زینڈنگ افسر ضلع ہنگو
نوعیات ڈسٹرکٹ اسیسٹنٹ کمیشن افسر ضلع ہنگو

POST NATAL MATERNITY LEAVE درج ذیل

صاحب عالی

قودبان گراش کی حاجی ہے کہ سائلہ کو 23 اگست 2018
کو ڈیپو ری (زچہ) ہوئی ہے

سائلہ کو صحت یاب ہونے تک مزید اجازت کی ضرورت

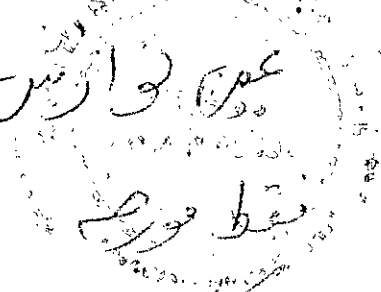
POST NATAL MATERNITY LEAVE = 45 دن کی

لیسی ڈیپو ری

لہذا آپ صاحبان میرا پی کرے 45 دن

ڈیپو ری سے پیشی قرار دیکر منگوا کر فرماویں

عمدہ کو ارس ہوگی



Attested

AA

وزیر تعلیم و تربیت (انگریزی) سکول سربراہ آباد نریاب VI

26/08/18 ضلع ہنگو

Muhammad
HANGU

OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED FARID KHAN HOSPITAL DISTRICT HANGU.

MATERNITY LEAVE CERTIFICATE

Certified that I have examined Mrs. Muzmal Bibi W/O Muhammad Rafiq R/O Thall-Distt; Hangu to day on 5.09.2018

She is advised (45) days (Post-Natal) maternity leave w.e.f 24.08.2018 to 07.10.2018.

*W
Toussif*

Woman Medical Officer,
Shaheed Farid Khan DHQ,
Hospital-Hangu

Woman Medical Officer
DHQ Hospital Hangu.

*Received to day 5/9 of 10:55 AM
2018*

[Signature]

Attested

[Signature]

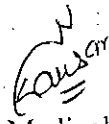
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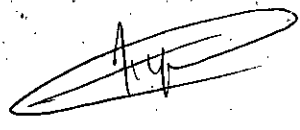
OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED FARID KHAN
HOSPITAL DISTRICT HANGU.

MATERNITY LEAVE CERTIFICATE

Certified that I have examined Mrs. Muzmal Bibi W/O Muhammad Rafiq R/O
Thall Distt; Hangu to day on 5.09.2018

She is advised (45) days (Anti-Natal) maternity leave w.e.f
10.08.2018 to 23.08.2018.


Woman Medical Officer,
Shaheed Farid Khan DHQ,
Hospital Hangu
Woman Medical Officer
DHQ Hospital Hangu.




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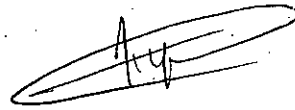
**OFFICE OF THE MEDICAL SUPERINTENDENT SHAHEED FARID KHAN
HOSPITAL DISTRICT HANGU.**

MATERNITY LEAVE CERTIFICATE

Certified that I have examined Mrs. Muzmal Bibi W/O Muhammad Rafiq R/O
Thall Distt; Hangu to day on 5.09.2018

She is advised (45) days (Anti-Natal) maternity leave w.e.f
10.08.2018 to 23.08.2018.


Woman Medical Officer,
Shaheed Farid Khan DHQ,
Hospital Hangu
~~Woman Medical Officer~~
~~Hospital Hangu.~~



حضرت جناب DE O صاحبہ (زنانه) ضلع ہنگو

(12) Anx-B

جناب عالی عنوان: شعواہ کی آڈائٹنگی

وڈ بآن گزارش کرتی ہوں کہ میں نے میٹرنٹی لیو لیا تھا

اب میں پکارنگولر ڈیوٹی انجام دے رہی ہوں

لیکن تاحال میری 4 مہینوں کی شعواہیں بند ہیں

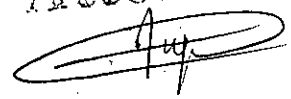
لہذا آپ صاحبان کی خدمت میں التجا کرتی ہوں

کہ میرے بند شعواہ کھولنے کے احکامات صادر فرما کر
ملکور فرمائیں

عین نوازش ہوگی

فقط مورخہ = 22-1-2019

Attested



العارض

پکی فرمائیدار منرمل پی پی پی PST گورنمنٹ گرنز پرائیمری

Mob-03339531633

کول عزیز آباد تحصیل ٹل ضلع ہنگو

محور جناب DE O صاحبہ (زنانه) ضلع ہنگو

(12) Annex-B

جناب عالیہ عنوان تنخواہ کی ادائیگی

وڈ بیان گزارش کرتی ہوں کہ میں نے میٹرنٹی لیو لیا تھا

اب میں پکارنگولر ڈیوٹی انجام دے رہی ہوں

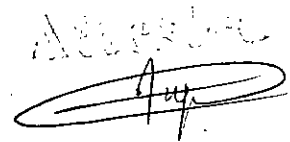
لیکن تاحال میری 4 مہینوں کی تنخواہیں بند ہیں

لہذا آپ صاحبان کی خدمت میں التجا کرتی ہوں

کہ میرے بند تنخواہ کھولنے کے احکامات صادر فرما کر
ملکو فرمائیں

عین نوازش ہوگی

فقط مورخہ = 22-1-2019



العارض

پکی فرما شہدار منزل بی بی PST گورنمنٹ گرنز پرائمری

Mob: 03339531633

کول عزیز آباد تحصیل ٹل ضلع ہنگو

To,

The SDEO Education
Hujra

Subject,

Appointment of New Chawkidar

Dear Madam It will be in your notice that our chawkidar Mr. Muhammad Afzal G.G.P.S. Aziz Abad Shinawari Zargaji has been retired on 15th of December 2016 and from the same date with out chawkidar as a female I am performing my duty in such aridley Area

please take necessary Action on my Application and make sure the presence of new Security Guard (Chawkidar) as soon as possible

I shall be thankful for that
Thanks

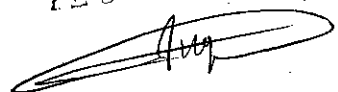
Yours

Muzamil bibi PST
G.G.P.S. Aziz Abad
Shinawari Zargaji

Dated = 30/12/2017

Muzamil
W/O MISTRESS
G.G.P.S. AZIZ ABAD
SHINAWARI ZARGAJI

ACCEPTED



No 01 Dated: 21/02/2017

(14)

OFFICE OF HEAD MISTRESS GGPS AZIZ ABABD ZARGARI

To,

D.E.O (F) Hangu.

Subject:

Vacant Post of Chawkidar

Memo,

Stated that, the post of Chawkidar in GGPS Aziz Abad Zargari has been lying vacant since September 15, 2016 till now.

In this sensitive situation when the security threats are in peak, the running of school without Chawkidar is impossible and at high risk.

Kindly, fill the post of Chawkidar as soon as possible and if something regarding security miss-happened, the responsibility will be your office and delaying in filling the said post may lead to the closure of the school.

Dated: 21/02/2017

Yours obedient,

Head Mistress,

GGPS Aziz Abad

copy to

- SDEO (F) Thal Hangu
- office copy

Personal
HEAD MISTRESS
GGPS AZIZ ABAD
DIST: HANGU

A. U.

14

No. 01 Dated: 21/02/2017

OFFICE OF HEAD MISTRESS GGPS AZIZ ABABD ZARGARI

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Dated: 21/02/2017

Yours obedient,

Head Mistress,

GGPS Aziz Abad

copy to

- SDEO (F) Thall Hangu
- office copy

Parvati
 HEAD MISTRESS
 GGPS AZIZ ABAD
 DIST: HANGU

A.A.

15

To

ASDEO Female KPESE Hangu

DEO Female KPESE Hangu

Subject: Need chokidar on urgent basis for GGPS aziz abad zargiri

Respected madam,

With due respect it is stated that I Mrs Muzammil Bibi PST of GGPS aziz abad zargiri sent you authorities an application before on 22/1/2017 regarding chokidar of our school which position is vacant from last 15 months. I also bring into the notice of monitoring officer Shabana many times about that but in vain. But no body took any action regarding this. I perform duty along with my new born 5 month baby without any security on the gate. If in future any accident or problem happens with school, teacher and students than who will be responsible for that.

So therefore I once again giving an application to take urgent notice on that issue and recruit chokidar on emergency basis as soon as possible

Thanks

Your sincerely

Muzammil Bibi

PST

GGPS aziz bad

Zargiri

COPY to

DC Hangu

DPO Hangu

DEO male Hangu

Distt nazim Hangu

Muzammil
HEAD MISTRESS
G.G.P.S. AZIZ ABAD
DISTT: HANGU

1500
[Signature]

بھجور جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (نمائندہ پرائیمری) ضلع ہنگو
 درخواست نمبر اطلاع بابت نشے بنے ہوئے کمرے کی تالے توڑنے میں

جناب عالیہ

مودبانہ گزارش کی جاتی ہے کہ کافی عرصہ سے گورنمنٹ گراؤنڈ پرائمری سکول عزیز آباد کا
 جو کیدار ریٹائرڈ ہو کر جو کیدار کا آسامی خالی رہی ہے۔

نویس آج (2/5/2018) صبح 7 بجے سکول گئی تو نشی بنی ہوئی

کمرے کی تالے ٹوٹی ہوئی پائی گئی

لہذا آپ صاحبان سے درخواست کی جاتی ہے کہ سکول کے
 سیکورٹی کو یقینی بنانے کے خاطر مناسب کارروائی عمل میں لائے ہوئے پیشکش
 فرمائیں۔

عین نوازش ہوگ

نقطہ اداب مورخہ 2/5/2018

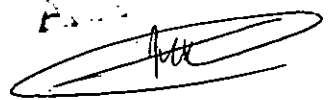
الغرضہ

آپ کی تابع فرمان مہمل بی بی P.S.H.T گورنمنٹ گراؤنڈ پرائمری
 سکول عزیز آباد نزد زرگری یونین کونسل ٹریاب II تحصیل مل
 ضلع ہنگو

Amal
 HEAD MASTER
 G.S.P.S. AZIL NAB
 DIST. HANGU

Copy to:

- ① D.C.O HANGU
- ② District NAZIM HANGU
- ③ Secretary Education K.P.K



محکمہ صحت و شہریت (گجرات) افسر صحت (زبانہ) ضلع منڈلی

جناب عالیہ

عنوان :- درخواست برائے طبی بوجب سہما (۲)

موردہ نام گزارش (۲) کی بھون کہ مجمع عرفان سہما سہما سہما
جسکے وجہ سے میں چلنے پھرنے اور ڈیوٹی سرانجام دینے سے
قادر ہوں۔ اور ڈاکٹر نے مجمع منڈلی آر ایم ہسپتال

کندہ گزارش (۲) کی بھون کہ بوجب سہما سہما اور
ڈاکٹر کے بلائی کے مطابق مجمع عرفان کی ضرورت
ہے۔ یہ سہما وجہ مجمع منڈلی صحت باب سہما
تس مجمع منڈلی سہما سہما
دعا گوارا ہوں

عین نواز شہ سہما

منڈلی صحت 28.03.2019

القاری

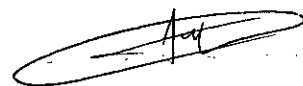
ABannil

منڈلی صحت PST 03 گورنمنٹ (زبانہ) سہما

منڈلی صحت سہما سہما

Mob no. 0333-9531633

Attested



۲
۲
محکمہ خزانہ کے ڈپٹی سیکرٹری / ایگزیکٹو انچارج / ایف ڈی اے (زبانہ) ضلع منٹو
جناب عالیہ!

عنوان :- درخواست برائے چھٹی بوجہ سہما (۲)

موردہ نامہ گزارشیں (۲) کی ہوں کہ مجھے صرف اس بار سہما (۲) کی ہوتی
جسٹس وجہ سے میں چلے پورے افر ڈپٹی سہما (۲) دینے سے
فار ہوں اور ڈپٹی سہما (۲) کے لئے مجھے مکمل آرام کا مشورہ
دیا ہے

گندہ گزارشیں (۲) کی ہوں کہ بوجہ سہما (۲) اور
ڈپٹی سہما (۲) کے مطالبہ مجھے آرام کی ضرورت
ہے۔ یہ سہما (۲) کے لئے مکمل صحت یاب ہوں
تس چھٹی سہما (۲) کے لئے
دعا گو رہوں گی

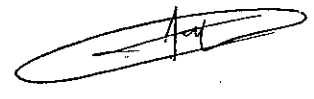
عین نوازش ہوگی

فقط حصر سے 28.03.2019

الفاریسی

ABannil

منزل سی سی پی او ایس ڈی گورنمنٹ گزٹڈ ہسپتال سکول
عزیز آباد تحصیل منٹو ضلع منٹو
Mob No. 0333-9531633



19



KUWAIT TEACHING HOSPITAL PESHAWAR MEDICAL COLLEGE



Abdara Chowk, Jamrud Road, Peshawar-Pakistan Ph: 091-5853486 / 5711418

OPD Consultation Form

Name: MUZAMIL BIBI W/O MUHAMMAD RAFIQ	Age: 30 Years	Gender: F	Address: Peshawar	Weight: kg	Date: 26-03-19 11:17:07 AM
--	------------------	-----------	-------------------	------------	-------------------------------

Consultant: **Dr. Muhammad Subhan (Professor)**

Last Visit: -- Department: **Medicine**

MRN: **2019-03-20125**

ORG: KTH-EMP-DEP

Ref By: **Complaints:**

Male Counter -176

اپنا MRN نمبر یاد رکھیں۔ اور دوبارہ آنے کی صورت میں یہ نسخہ ضرور ساتھ لائیں۔

EMP DEPENDENT RS. 20/-	Rs 1000 Consultation Fee *FREE*
------------------------------	--

Diagnosis:

Lu/Ls
PTD.

Pyogenic Cess

Adh

Tas Caplam se
ves.

NCS

EMGs

Cup Th ceter up
es

MRP + LS spine

Cbc.

UFTs

RFTs

tes Prelim AS
es

Attested

Am

9

Consultant's Signature



20

PESHAWAR MEDICAL COLLEGE KUWAIT TEACHING HOSPITAL

ABDARA CHOWK, UNIVERSITY ROAD, PESHAWAR - PAKISTAN.
Tel: 091-5711432, 091-5853486, 5711418 - EXT 106, FAX: 091-5843968



DEPARTMENT OF RADIOLOGY

Patient Name: Mumzamil W/O Rafiq
Date: 27.03.2019

Age 30Y/Sex Female
Ref By: Indoor Pt

MRI L.S Spine

Clinical data:

- Sciatica lower backache.

Technique:

Multi planner multiecho MRI of L.S.spine

Report:

Normal lordosis is noted.

Early loss of disc hydration signals at L4/5 and L5/S1 level .

Vertebral bodies reveal normal signal and heights .

Para vertebral soft tissue appears normal.

Conus medullaries terminates at normal level .

High intensity zone is seen in posterior fiber of L4/5 disc suggestive posterior annular tear .

At L1/2 through L3/4 and L5/S1 levels: no evidence of disc bulges / protrusions. Patent spinal canal and neural foraminal stenosis.

At L4/5 level : mild broad based disc bulge abutting the thecal sac . Minimal bilateral neural foraminal stenosis is seen.

Conclusion:

- Posterior annular disc tear at L4/5 level .
- At L4/5 level : minimal bilateral neural foraminal stenosis due to mild broad based disc bulge .

Dr. Abdul Majid
Professor of Radiology)
M.B.B.S , FCPS
Fellowship Vascular &
Interventional Radiology

Dr. ZeenatAdil *Dr. SidrahSaeed* *Dr.MahnoorRehman*
DMRD (Radiology) *FCPS (Radiology)* *(FCPS Radiology)*
Assistant Professor *Senior Registrar* *Senior Registrar*

This is computer generated report . No need of signature .

Attested
Aw

21

KUWAIT TEACHING HOSPITAL

ABDARA CHOWK, UNIVERSITY ROAD, PESHAWAR - PAKISTAN.
TEL: 091-5853486, 5711418 - EXT 106, FAX: 091-5843968

DEPARTMENT OF PATHOLOGY



MRN 2019-03-20125

Lab No 349976/59

Name MUZAMIL BIBI W/O MUHAMMAD RAFIQ

Date 26 / 03 / 2019

Gender F

Age 30-Year, 0-Month, 0-Day

Ref. By Dr. Muhammad Subhan (Professor)

Specimen blood

Test	Result	Reference Range
HAEMATOLOGY		

Blood Complete (CBC)

Haemoglobin	12.5 g/dl	M: 14--18, F: 12--15
TLC	7,000 /cumm	(4,000 ---11,000)

DLC

Neutrophils	52 %	(45 --- 75)
Lymphocytes	38 %	(20 --- 45)
Monocytes	08 %	(02 --- 10)
Eosinophils	02 %	(01 --- 06)
Platelets count	275,000 /cumm	(150,000 - 450,000)

LIVER PROFILE

LFTs

Bilirubin	0.9 mg/dl	(0.3 --- 1.2)
ALT(SGPT)	49 U/L	(09 --- 45)
Alkaline Phos.	88 U/L	Male: (40 -- 129) Female: (35 -- 104) Child: Upto (469)

RENAL PROFILE

RFTs

Blood Urea	38 mg/dL	(15 ---- 40)
S. Creatinine	0.7 mg/dL	(0.3 --- 1.3)

NOTE: In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

Attested
[Signature]



22 Annex - E
OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) HANGU

No: 9690-97/Absent Notice File

Dated: 26-10-2019

To,

Miss: Muzamil Bibi D/O Wakeel Khan PST,
GGPS Aziz Abad Tehsil Thall District Hangu.

Home Add: Mohallah Aziz Abad Tehsil Thall District Hangu (REGISTERED)

Subject: Removal From Service

Memo:

You Miss: Muzamil Bibi D/O Wakeel Khan PST GGPS Aziz Abad District Hangu has remained willfully absent since 09-04-2019.

Pursuance to E&D rules 2011, Khyber Pakhtunkhwa Section 5. sub-section (a), You being accused of long absence were served 3 show cause notices vide this office letter No. 210-13 Dated 28-05-2019 (Notice-I), No 276 Dated 13-09-2019 (Absent Notice II), and No. 273 Dated 21-09-2019 (Absent Notice III) respectively, but no response.

Under section no. 7 of the above quoted E&D rules 2011 through newspaper (Daily Aaj) Dated 09/10/2019, you were directed to attend the office of undersigned in person within 15 days after publishing show cause notice to explain your position with cogent reason of your willful absence but you failed to do so.

Now therefore, the District Education Officer (Female) in exercise of powers conferred by the Government of Khyber Pakhtunkhwa, efficiency and disciplinary rules 2011, the competent is pleased to impose of "REMOVAL FROM SERVICE" upon Miss: Muzamil Bibi D/O Wakeel Khan PST GGPS Aziz Abad District Hangu, from the date of absence from duty.

NOTE: Recovery of illegal drawn if any is also ordered.
Necessary entries must be made in the relevant record.

sd-
District Education Officer
Female Hangu

Endst:No & Dated Even:

Copy to the:

- 1) Director (E&SE) Deptt: Khyber Pakhtunkhwa Peshawar.
- 2) Deputy Commissioner Hangu.
- 3) District Account Office Hangu.
- 4) District Monitoring Officer District Hangu.
- 5) Sub Divisional Education Officer, Female Primary Thall District Hangu.
- 6) ADEO (Estab:) Local Office.
- 7) EMIS Local office Hangu

Attested
[Signature]

[Signature]
District Education Officer
Female Hangu

کھنڈہ خواتین ڈائریکٹریٹ کے ایگزیکٹو ایڈمنسٹریٹو سیکرٹری ایجوکیشن کھنڈہ

عنوان: محکمہ ایڈمنسٹریشن اور فاسٹنگی کے ملازمت ایڈمنسٹریشن /
سائل نمبر: 9690-979 Absent Notice File سولہ سو 28/10/19

خواتین کے بارے میں (عرفی) سائل ہے

1- یہ کہ ایڈمنسٹریشن / سائل نمبر 9690-979 میں بطور PST ٹیمپورری طور پر مقرر ہوئی تھی اور بعد از پھر ٹیمپورری ایڈمنسٹریشن / سائل نمبر 9690-979 میں منتقل ہوئی انتہائی ضوابط اور ایمانداری کے ساتھ انجام دینی چاہیے اور اس کے دوران ملازمت کے دوران سے کسی بھی غیر معمولی صورت میں رہی اور نہ ہی محکمہ کو کسی شکایت کا موقع فراہم کیا

2- یہ کہ ایڈمنسٹریشن / سائل نمبر 9690-979 کو مورخہ 23/8/2018 کو ہوائے Maternity leave درخواست دیا تھا جو کہ منسوخ ہوئی اور سائل نمبر 9690-979 کو 07-10-2018 تک چھٹیال دی گئی

عادل گل

3- یہ کہ Maternity leaves کے لیے ایڈمنسٹریشن / سائل نمبر 9690-979 کے دوران ایسی ملازمت شروع کی گئی تھی جس کے لیے ایڈمنسٹریشن / سائل نمبر 9690-979 سے تعلق رکھتا تھا اور اس کے دوران 2018 میں بحال نہ ہو سکا اور ایڈمنسٹریشن / سائل نمبر 9690-979 میں منتقل ہو گیا اور اس کے لیے ایڈمنسٹریشن / سائل نمبر 9690-979 کے دوران سے اس کے لیے Release کرنے سے متعلق درخواست ہوائے گزرا ہے لیکن ایڈمنسٹریشن / سائل نمبر 9690-979 کے دوران سے اس کے لیے درخواست پر کوئی عملدرآمد نہ ہوا

D.D # 1476
25/11/2018

4- یہ کہ ایڈمنسٹریشن / سائل نمبر 9690-979 کے دوران سے اس کے لیے درخواست پر کوئی عملدرآمد نہ ہوا اور اس کے لیے ایڈمنسٹریشن / سائل نمبر 9690-979 کے دوران سے اس کے لیے درخواست پر کوئی عملدرآمد نہ ہوا

(Signature)

قلعہ ہنگو کو عدم تحفظ اور سکورٹی کا سامنا تھا کیونکہ سکول ہذا کالوگڈار
 2016 میں ریٹائرڈ ہو گیا تھا اور جوگڈار نے ریٹائرڈ ہونے کے بعد سکول ہذا
 کو غیر جوگڈار کے چل رہا تھا کئی دفعہ سکول ہذا کے نامے توڑ گئے
 اور آئی فون پر سکول ہذا میں گھنٹا دھکی آگئے اور سکول ہنگو کے
 جس سے ایبلٹ اور طالبات اور ان کے والدین میں سخت تشویش پیدا ہوئی تھی
 لیکن ان سے باوجود ایبلٹ / سائلہ نے اپنی ذمہ داریاں نبھائی اور
 حکم کو برائے تعیناتی جوگڈار کی خطوط ارسال کیے لیکن اس پر
 کوئی کارروائی عمل میں نہ لائی۔

5- یہ کہ ایبلٹ / سائلہ چند ماہ قبل عرق النساء بیماری سے مبتلا ہوئی
 اور جگہ گھرنے، اٹھنے بیٹھنے سے قاصر رہی ہیں اور اپنی ڈیوٹی سر انجام
 دینے سے بھی تندرست قاصر رہی اس وجہ سے ایبلٹ / سائلہ نے حکم کو آئی
 درخواست جمع کی ہے جس پر ضرورت گزارا اور سائلہ نے ایبلٹ اور سائلہ کے معاملات شروع کیا۔

6- یہ کہ ایبلٹ / سائلہ کو چند دن قبل معلوم ہوا کہ حکم نے ان کو بزرگیہ مذکورہ
 معترضہ حکم کوئی سے ترقیات کیا ہے حالانکہ سائلہ کو اس نسبت کوئی
 قبل شوکار فونسی وغیرہ موصول نہ ہوئے / نہ کیا گیا ہے اور نہ ہی کوئی
 تشویشی کا موقع فراہم کیا گیا ہے یہی وجہ حکم معترضہ غلط خلاف قانون
 بلکہ غیر اور اور سائنس میں قابل منسوب ہے

7- یہ کہ ایبلٹ / سائلہ کی غیر جانبداری بعد ازاں نہ ہے بلکہ موجودات بالہ ہے

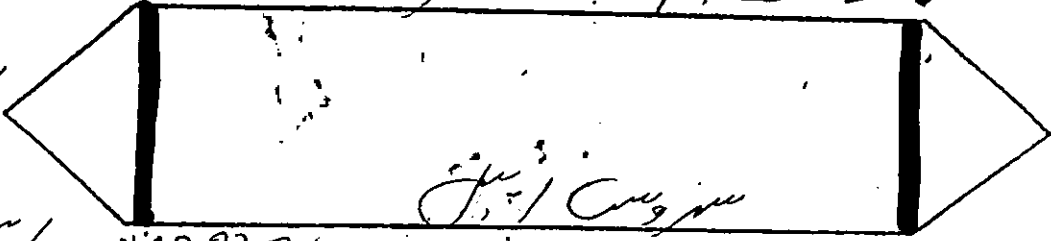
8- یہ کہ حکم معترضہ جو *Retrospective effect* دینے میں غیر قانونی ہے نہ قابل منسوب ہے

لہذا آپ جناب سے گزارش کی جاتی ہے کہ یہ سب ہذا مندرجہ فرما کر
 قلمیہ معترضہ مذکورہ شروع فرمایا جائے اور ایبلٹ / سائلہ کو ترقی پر بحالی
 کے امکانات صادر فرمادے

صفا محمد علی بی بی دختر ذیل خان ولد نجم PST ٹیچر کی صاحبزادی اور ہنگو ایبلٹ / سائلہ

بعدالت جواب جسٹریکٹوں فوآہ سروس ٹریڈ یونٹ

شیخ احمد



ریسٹورنٹ

صفحہ 2020 مخائب

موزونہ	-----	سماہ جنرل بی بی
مقدمہ	-----	بنام ڈسٹرکٹ ایجوکیشن افسر
دعویٰ	-----	ڈسٹرکٹ ایجوکیشن افسر (رٹائنہ) جھنگو وختہ
ج.م	-----	محمد رفیق سابقہ PST جھنگ

باعت تحریر آنکھ ڈراما نذر ڈراما محفل

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ صلے دینگو
 آن مقام محمد رفیق کیلئے محمد رفیق اور محمد رفیق کے
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرایں پُر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
 پرداخت منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جہانہ التوائے مقدمہ کے سبب سے دہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

صلے ایجوکیشن افسر
 جھنگ ٹریڈ یونٹ
 شیخ احمد

سماہ جنرل بی بی دھڑوہیل خان زونل محمد رفیق سابقہ ڈسٹرکٹ ایجوکیشن افسر
 جھنگ ٹریڈ یونٹ

المرقوم 25

واہ الب

مقام شیخ احمد کے لئے منظور ہے۔

Accepted
 [Signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re:
Service Appeal No 1208-P/2020

Mst: Muzamil Bibi.....(Appellant)

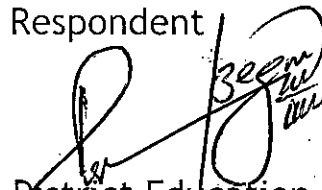
V E R S U S

Secretary to Government of KP and others.....(Respondents)

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Para-wise comments		
2.	Affidavit		
3.	Copy of the report	'A'	
4.	Copy of the absent report	'B'	
5.	Copy of publication	'C'	
6.	Copy of the Endst No 293-96	'D'	
7.	Wakalat Nama (in original)		

Respondent



District Education Officer
(Female) Hangu

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re:
Service Appeal No 1208-P/2020

Mst: Muzamil Bibi, Ex-PST Teacher D/O Wakeel Khan W/O
Muhammad Rafiq R/O Mohallah Aziz Abad, Shana Wori, P.O
Zargari Tehsil and District Hangu.....(Appellant)

V E R S U S

1. Secretary to Government of Khyber Pakhtunkhwa, Elementary
and Secondary Education Department KPK, Peshawar
2. Director Education Elementary and Secondary Education
Department KPK, Peshawar
3. District Education Officer (Female) Hangu
4. Sub Divisional Education Officer (Female), Primary Thall,
Hangu
5. Director Education Elementary and Secondary Education
Department KPK, Peshawar
6. Secretary to Government of Khyber Pakhtunkhwa, Elementary
and Secondary Education Department Khyber Pakhtunkhwa,
Peshawar.....(Respondents)

PARA-WISE COMMENTS/WRITTEN REPLIES

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS:-

- A) That the Appellant has got no cause of action.
- B) That the appeal is not maintainable
- C) That the appeal is bed for mis-joinder and non-joinder
- D) That the appeal is barred by law.

ON FACTS:-

1. Para No 1 is pertains to record.
2. Para No 12 is also pertains to record.
3. Para No 3 is incorrect. After completion of maternity leave in the month of October, 2018; the Appellant was reported absent by the IMU Department Hangu w.e.f 17-10-2018. (Copy attached as Annex 'A').
4. Para No 4 is incorrect; the Appellant is the resident of that village where the school is situated.
5. Para No 5 is incorrect. The Appellant was willful absent from duty. Three absent notices have been issued under registered covered on her home address from time to time to report for duty, but she failed. (Copy of the absent notices is attached as Annex 'B' eventually this office published a show cause notice in daily newspaper i.e. "Daily Ajj" dated 09-10-2019. (Copy attached as Annex 'C').
6. Para No 6 is incorrect, after completing of all codal formalities as per rules in policy, the Respondent

department issued removal from service order being not interested towards her job.

7. Para No 7 is incorrect, the Appellant should have submitted her appeal to the next higher authority i.e. Director, E&SE Peshawar.
8. Para No 8 is incorrect. The act of the Respondent No 4 is correct, lawful and according to the rules and policy of the Government.

GROUND:-

- A) Para A is incorrect, the removal order dated 26-10-2019 is legal, lawful and as per rules and policy.
- B) Para B is incorrect, the removal from service order is legal, as the Appellant had not served official duty, proper show cause notices have been served on her home address as stated in above para No 5.
- C) Para C is incorrect, as stated in above para No B.
- D) Para D is incorrect, proper proceedings have been initiated against the Appellant as she did not report for duty after issuing absent/show cause notices.
- E) Para E is incorrect, proper show cause notices was published in daily "Aaj" dated 09-10-2019 but she did not report to the office of Respondent within stipulated period.
- F) Para F is incorrect. As replied above.

- G) Para G is incorrect, a special report submitted by the concerned SDEO (F) Thall District Hangu vide her Endst No 293-96 dated 03-09-2019. (Copy attached as Annex 'D').
- H) Para H is partially incorrect; she did not submitted her application for medical leave in the office of Respondent.
- I) Para I is incorrect, the Appellant's removal from service order is as per rules and policy.
- J) Para J is relates to Court matter.
- K) The Respondents seek leave to raise additional grounds at the time of arguments.

Keeping in view, the above given comments, the appeal may kindly be dismissed with cost.

Respondent:-

(4)

2) Director, Ele & Secy:
Edu: Deptt: Peshawar

(1)

3) District Education Officer
Female Hangu

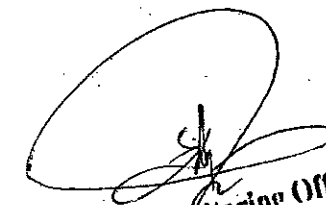
(2)

4) Sub-Divisional Education Officer
Female Pry: Thall Hangu

5 3

ABSENT REPORT OF MUZAMIL BIBI W.E.F 01/10/2018 TO 31/12/2019

EMIS Code	Name of School	Gender	Level	District	Tehsil	School Status	Reason	Monitoring Date
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student and teaching Staff Absent	2018-10-17 10:47:20
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student and teaching Staff Absent	03/12/2018 12:34
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student and teaching Staff Absent	15/01/2019 11:23
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student Absent	13/02/2019 10:10
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student and teaching Staff Absent	2019-03-13 12:22:02
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student and teaching Staff Absent	2019-04-26 09:23:07
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Student and teaching Staff Absent	2019-05-07 08:23:11
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Permanent Non Functional	2019-09-16 10:51:08
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Permanent Non Functional	2019-10-09 10:53:22
31389	GGPS AZIZ ABAD	Girls	Primary	HANGU	THALL	close	Permanent Non Functional	2019-12-09 10:55:32


District Monitoring Officer
Hangu, KP-EMA E&SE Deptt
Govt of Khyber Pakhtunkhwa

مورخہ 28-5-2019

(7)

6 B

210-213

نمبر

از

دفتر سب ڈویژنل ایجوکیشن آفیسر
زنانہ پرائمری ٹل، ہنگو

بجانب:-

سرکاری PST ڈیپارٹمنٹ

سیل نمبر آزاد سٹارڈی ریگری (مٹنگ)

نوٹس غیر حاضری۔

عنوان:-

یادداشت:-

آپکو بذریعہ سرکاری نوٹس ہذا مطلع کیجاتا ہے کہ آپ مورخہ 2019-4-09 سے بغیر کسی اطلاع کے سکول ڈیوٹی سے غیر حاضر ہے۔ آپ کے اندر اندر ذیل دستخطی کو دفتر میں حاضر ہو جائے۔ اور اپنی غیر حاضری کی تحریری وجہ بیان کریں۔ بصورت دیگر محکمہ آپ کیخلاف محکمہ روز 2011 کے تحت کارروائی ممکنہ کرے گی۔ جس میں اپنی ملازمت سے برخاستگی بھی ہو سکتی ہے۔

Mrs. Nisa
سب ڈویژنل ایجوکیشن آفیسر
زنانہ پرائمری ٹل، ہنگو

مورخہ 28-5-2019

210-213

مراسلہ نمبر

کاپی برائے اطلاع۔

(1) ڈائریکٹر آف ایجوکیشن (ایلیمنٹری اینڈ سیکنڈری) ایجوکیشن خیبر پختونخواہ۔

(2) جناب ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ہنگو۔

Mrs. Nisa

سب ڈویژنل ایجوکیشن آفیسر
زنانہ پرائمری ٹل، ہنگو

5396-5451

(6)

(9)

B

B

از دفتر سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹل

13-9-19

276

بنام:

Chowkidar/PST/PSHT

سرمل

گورنمنٹ گرلز پرائمری سکول: عینہ آباد

جواب طلبی

مضمون:

یادداشت:

13-9-19

ٹل

SDEO/ASDEO سرکل آفس ہنگوئے مورخہ

کے سکول کا اچانک معائنہ کیا تو آج کے سکول بند پائا گیا

لہذا اس چھٹی کے ملتے ہی فوراً لاپٹ سے سکول کے بند ہونے اور اس کی عینہ آباد کی

کریں۔ آپ کا جواب دفتر ہذا کو تین دن کے اندر اندر موصول ہونا چاہیے۔ اگر آپ کا جواب طلبی میں ہزاروں ٹانہ آج کے خلاف سخت حکمانہ کارروائی کی جائیگی۔

P.A

سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹل

276

کاپی برائے اطلاع

(1) DEO (زنانہ) ہنگوئے

(2) ڈی ایس ڈی ہنگوئے

(3) SDEO (F)

(4) ایگزیکٹو آفیسر ایس ڈی ایس ڈی ہنگوئے کے پاس

P.A

سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹل

B
از دفتر سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹل

نمبر: 273 تاریخ: 21/9/19

نام: مزملہ بی بی
Chowkidar/PST/PSHT

گورنمنٹ گرلز پرائمری سکول: گزٹل آباد

مضمون: جواب طلبی

بابت: غیر حاضری

16/9/19

SDEO/ASDEO سڑک آنس بنگوئے مورخہ: 16/9/19
کے سکول کا اجاگہ معائنہ کیا تو۔ اگلو اور دیکھتے ہوئے نوٹ کو غیر حاضر پایا
بد اس چھٹی کے لئے ہی فوراً۔ سن۔ یو۔ کے۔ انور۔ غیر حاضری۔ کی وجہ
کریں۔ آپ کا جواب دفتر ہذا کو تین دن کے اندر اور موصول ہونا چاہیے۔ اگر آپ کا جواب تلی بخش قرار نہ پایا تو
خلاف سخت عکمانہ کارروائی کی جائے گی۔

سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹل

نمبر: 273

ذیل برائے اطلاع:

(1) DEO (زنانہ) ٹل

(2) ڈپٹی کمشنر

(3) SDEO (F)

(4) اڈاکٹ ٹول آنس کراہیتہ دی بانئی ہے کہ مستحقہ خان سے۔ ہم کی کٹوتی کی جائے۔

مزملہ بی بی
21/9/19

سب ڈویژنل ایجوکیشن آفیسر (زنانہ) ٹل

کا خطرہ اور بھی زیادہ سستی 34 یصد تھا ڈاکٹروں بھی ہو جائے تو نقصان دہ بن جاتی ہے۔

کوئٹہ کی حاضری

ہر گاہ کہ آپ درج ذیل ملازمین سے دیے گئے تفصیل کے مطابق اپنی ڈیوٹی سے غیر حاضر ہیں۔ دوران غیر حاضری آپ کو آپ کے کمر کے نمبر میں تین دنوں کو جرمانہ جاری کئے گئے جس میں آپ کو ڈیوٹی پر حاضر ہونے کی ہدایت کی گئی ہے۔ اس کے باوجود آپ اپنی ڈیوٹی پر حاضر نہ ہوئیں۔ لہذا آپ کو جرمانہ بار بار جاری کیا جاتا ہے کہ ڈیوٹی پر حاضر ہونے کے بعد دن کے اندر رازداری کی صورت میں آپ کے خلاف کیٹرز چھگانا تادیبی کارروائی عمل میں لائی جائے گی۔ جس میں آپ کی ملازمت منسوخ کر دی جائے گی۔

سلسلہ نمبر	نام بمطابق نام	تاریخ غیر حاضری	نمبر دوران غیر حاضری	مستقل پتہ
1	راہد کمال (PST) گورنمنٹ گرلز پرائمری سکول ضلع ہنگو	18-04-2019	ڈوش نمبر 1: 138-39-2019 مورخہ 23-04-2019 ڈوش نمبر 2: 213-16-2019 مورخہ 06-05-2019 ڈوش نمبر 3: 321-23-2019 مورخہ 28-05-2019	دروزی پلہ سرائے ہنگو
2	فرہادہ دختر عبدالسلام (PST) گورنمنٹ گرلز پرائمری سکول شمس الدین بانڈہ ضلع ہنگو	15-04-2019	ڈوش نمبر 1: 134-36-2019 مورخہ 23-04-2019 ڈوش نمبر 2: 217-19-2019 مورخہ 06-05-2019 ڈوش نمبر 3: 324-26-2019 مورخہ 28-05-2019	بڑھ عباس خیل ضلع ہنگو
3	حالیگیر احمد ولد گل صاحب خان (چوکیدار) گورنمنٹ گرلز پرائمری سکول سرلوکنڈا اوہانگ	20-05-2019	ڈوش نمبر 1: 318-20-2019 مورخہ 28-05-2019 ڈوش نمبر 2: 376-78-2019 مورخہ 22-06-2019 ڈوش نمبر 3: 396-97-2019 مورخہ 04-07-2019	سرلوکنڈا اوہانگ ضلع ہنگو
4	مزل بی بی دختر دیکل خان (PST) گورنمنٹ گرلز پرائمری سکول عزیز آباد ہنگو	09-04-2019	ڈوش نمبر 1: 210-13-2019 مورخہ 28-05-2019 ڈوش نمبر 2: 276-2019 مورخہ 13-09-2019 ڈوش نمبر 3: 273-2019 مورخہ 21-09-2019	علاقہ عزیز آباد شہر ڈویژن زریگیری تحصیل گل ضلع ہنگو

پروین بیگم خٹک

ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ضلع ہنگو

Say No To Corruption / Drugs INF(P)4214/19 www.khyberpakhtunkhwa.gov.pk

CAREER OPPORTUNITIES

A Public Sector Organization invites application from suitable candidates having domicile of relevant district of Khyber Pakhtunkhwa, for the following Positions. Appointments will be made purely on contract basis till 30th June 2020 with possibility of extension.

Title of Post	BPS	Eligibility Criteria	No. of Posts and Allocation
Nutrition Assistant (Female)	12	<ul style="list-style-type: none"> BA / B.Sc 18 to 35 years of Age Preferably having experience in Nutrition or Health Sciences Preferably Local candidates Domiciled in the province of Khyber Pakhtunkhwa Proficiency in Urdu, Pashto and other local languages 	Battagram = 02 Buner = 02 Chitral = 03 Dir Lower = 01 Haripur = 02 Kohistan = 04 Manshera = 04 Malakand = 01 Kohat = 01 Tank = 01 Total = 21

General Instructions:

- Interested Individuals may send attested copies of educational documents, DMCs experience certificates, Contact Numbers, CNIC and domicile to "P.O

چانک خرائے لینے والے
راڈ اکثر سے رجوع کریں

er
جب بڑے بڑے ایسے افعال کر رہے ہیں تو اس میں زہر ملا سواں ہم سے چیشاب کے ناموں میں موجود رہتا ہے سونا مشکل ہو جاتا ہے جو اپنی کیفیت پیدا ہونے والے ایسے

2019
دوران سے ہر معمول میں تینوں کے دوران لینے میں مشکل کا عارضہ بھی سامنے آسکتا ہے اس عمل سے گزرتے ہوئے اسے سامنے نہ لیتے دیگر مشکلات کا سامنا کرنا بھی ہوسکتا ہے اگر کوئی فرد چانک خرائے لینے کے لئے اسے رجوع کرنا چاہے۔ تاکہ اس کی صحت خراب نہ ہو سکے۔

GOVERN COMMU

NO BANDA (Single S. Hangu.

S:NO	Name of Prequ Contractors
1	M/S Akhunzad
2	M/S Kundi Dev
3	M/S Amin -ul-
4	M/S Al Mehree
5	M/SContecn
6	M/S Matracon
7	M/S Mchamma

No. 4339
PSTs Dated
26-04-
till absent

1. Communication District North Wazli firms / contractors in envelop procedure for (Merged Areas) W 27.9.2019.

S.No	Name of Work
1-	Construction of Bridge on Major roads in Tribal District ADP No. 614/180574 (Sub Head:- Construction of Bridge at Banda on road connecting Thal' Boya Miranshah Datta khel road Tribal District North Waz

- Instruction to bid prior to the opening of
- Complete set of undersigned on pay any working day one
- Bidders who submitted be debarred from participating
- Bid security 2% of

District Education Officer
Female Hangu

970

(96) ——— (5) D

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
FEMALE THALL HANGU
SPECIAL REPORT

Today on 13/09/2019, I visited the school GGPS Aziz Abad. School was found closed according to the Community school is permanently closed from one year and teacher has Attendance register at her Home. Chowkidar was newly appointed and was present at School. School record was not available at school. undersigned went to Miss Muzamal Home and took Teacher and Student attendance Register from her Home, Before my visit school was visited by EX-SDEO(F) Thall and ASDEO(F) Thall and also IMU Monitor. During the visited of above concerned school was also found closed:

- 1) EX-SDEO (F) Primary Thall visited at dated:09-04-2019 school was found closed also Notice attached.
- 2) SDEO (F) primary Thall visited at dated: 13/09/2019 school was found closed also Notice attached.
- 3) ASDEO (F) Primary Thall visited at dated: 16/09/2019 school was found closed also Notice attached.
- 4) According to IMU Monitor Report January, 2019 Till September, 2019 GGPS Aziz abad found closed. In regard DEO (F) called explanation from Concerned SDEO(F) Thall.

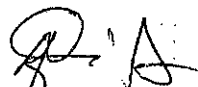
In this regard when I called the said teacher Miss Muzamal, She replied that she don't want to continue her duty and she already submitted her medical paper for Medical Board in DEO(F) Office Hangu. According to the Admission Withdrawal Register the last student was enrolled on 16/04/2018. In current year No student was enrolled or Promoted in any Class. So it is requested to conduct inquiry against this teacher and take disciplinary action according to E&D rules.

Infrastructure:

- 1) Conditional Grant was allocated for Electricity and additional Class Room.
- 2) Two Class Rooms are totally damaged and can make a big disaster.
- 3) One Classroom is under construction work was not satisfactory.
- 4) Electricity was not available. also Electricity Boards are totally damaged.

800 plants stored by forest office in this school according to the Chowkidar they said that the school is permanently closed so the forest officer says that these plants stored here. Undersigned direct the Chowkidar to carry out these plants from school as soon as possible.

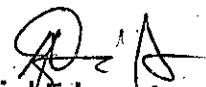
DEO (F) Hangu is requested to direct the SDO P&D to check the Conditional Grant and PTC record also the building situation.


Sub Divisional Education Officer
Female Primary Thall Hangu

Endst No: 293-96 Dated: 30/9 /2019

Copy to:

- 1) Deputy Commissioner Hangu
- 2) District Monitoring Officer Hangu.
- 3) District education officer female Hangu
- 4) Master File


Sub Divisional Education Officer
Female Primary Thall Hangu

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

In Re:

IN

Service appeal No. 1208/2020

Mst. Muzamil BibiAppellant

VERSUS

District Education Officer (Female) Hangu and others
.....Respondents

**REJOINDER TO THE
COMMENTS ON BEHALF OF
THE APPELLANT.**

Respectfully Sheweth:

OBJECTIONS TO PRELIMINARY OBJECTION;

- 1) All the preliminary objections from Para A to D are illegal, misconceive and misleading.

OBJECTIONS TO FACTUAL OBJECTION;

1. Para no 1 needs no reply.
2. Para No .2 of the comments is incorrect, while Para No. 2o fthe appeal is correct.
3. Para No. 3 of the comments is incorrect, the appellant performed her duty with full devotion

and zeal irrespective of the circumstances of the area & School which was run by the appellant without any Chowkidar/security, the so called report of respondents is fake one and prepared in office just to safe their faces.

4. Para No. 4 of the comments is incorrect, while Para No. 4 of the appeal is correct, because the appellant so many time submitted application for providing security in the shape of Chowkidar, because the Chowkidar of the said school was retired in the year of 2016, but dispute the above agonies of the appellant, the respondents turn their deaf ears.
5. Para No. 5 of the comments is incorrect, no notice was personally served upon the appellant, the appellant remained unheard.
6. Para No. 6 of the comments is incorrect, No codal formalities was fulfilled in the appellant case.
7. Para No. 7 of the comments is incorrect, while Para No. 7 of the appeal is correct, department appeal of the appellant is on record, part and parcel of the instant service appeal.
8. Para No. 8 is incorrect, the appellant is highly aggrieved from both the impugned orders of the respondents and file the instant appeal.

OBJECTIONS TO REPLY ON GROUNDS;

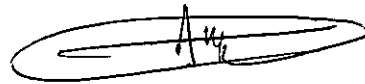
- A. Ground No. A is incorrect, the appellant was not proceeded departmentally in accordance with law and rules and remained unheard.
- B. Ground No. B is incorrect, No codal formalities have fulfilled in the appellant case.
- C. Ground NO. C is incorrect, the detail answer is given in the above paras.
- D. Ground D is incorrect.
- E. Ground E is incorrect, the grounds taken in the appeal is correct, whereas that of respondent is incorrect.
- F. Ground F is incorrect.
- G. Ground G is incorrect, the so called report is fake and bogus one, hence not tenable.
- H. Ground G is incorrect and without justification.
- I. Ground I is incorrect, no regular/proper inquiry was conducted against the appellant and ignored all the codal formalities willfully by the respondents.
- J. Ground J is legal one needs no reply.

K. In reply of Ground K, the appellant with prior leave of this Hon'ble tribunal seeks permission to raise further grounds at the time of arguments.

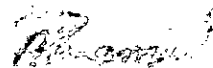
It is therefore, most humbly prayed that on acceptance of this rejoinder, the comments of the respondent may kindly be ignored and the appeal of the appellant may kindly be accepted for the end of justice.

Appellant

Through



Muhammad Ilyas Orakzai
Advocates, High Court
Peshawar



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

In Re:
IN
Service appeal No. 1208/2020

Mst. Muzamil BibiAppellant

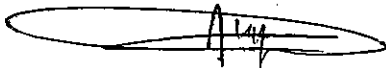
VERSUS

District Education Officer (Female) Hangu and others
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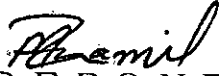
AFFIDAVIT

I, Mst. Muzamil Bibi (Ex-PST) D/o Wakeel Khan
W/o Muhammad Rafiq R/o Mohallah Aziz Abad,
Village Shinawari P.O Zargari Tehsil Thall, District
Hangu, (Appellant) do hereby solemnly affirm and
declare on oath that the contents of the
accompanying Rejoinder are true and correct to the
best of my knowledge and belief and nothing has
been concealed from this Hon'ble Court.

Identified by:



Muhammad Ilyas Orakzai
Advocates, High Court
Peshawar


DEPONENT
CNIC: 14101-7408883-4
Cell No. 0333-9531633

