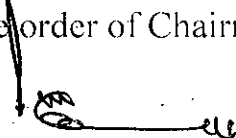


FORM OF ORDER SHEET

Court of _____

Case No. - 1909/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/12/2022	<p>The appeal of Mst. Noreen Nazli resubmitted today by Mr. Niaz Ali Khan Jaghra Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Noreen Nazli wife of Shah Faisal Pukha Ghulam Peshawar received today i.e. on 16.12.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- ✓ 3- Memorandum of appeal is not signed by the appellant.
- ✓ 4- Annexures of the appeal are unattested.
- 5- Index of the appeal is incomplete.
- 6- Appeal has not been properly page marked.
- 7- Chamber/email address of the counsel is not mentioned on the index.
- 8- Annexure-B of the appeal is missing.
- 9- Annexures of the appeal are not in sequence.
- 10- Order dated 15.07.2022 is illegible.
- 11- Five more copies/sets of the appeal along with annexure i.e. complete in all respect may also be submitted with the appeal.

No. 3655 /S.T,

Dt. 19-12 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Niaz Ali Khan Jaghra Adv. Pesh.

*all objections
are removed,
Niaz*

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

Service Appeal No. 1909 /2022

Mst: Noreen Nazli Appellant

VERSUS

Government of KP and others Respondents

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Service Appeal alongwith Affidavit		01-06
2.	Memo of Addresses	-	7
3.	Copy of the CNIC of the appellant	"A"	8
4.	Copy of the Pay Slip	"B"	9-22
5.	Copy of the Medical prescriptions	"C"	23-26
6.	Copy of the order dated 15.07.2022	"D"	27-28
7.	Copy of the grounds of appeal and order dated 04-10-2022	"E&F"	29-32
8.	Wakalat Nama Original		33

Dated 23/12/2022

Petitioner

Through

Niaz Ali Khan Jaghra
Advocate High Court
Peshawar

Office Address: GT Road Saddique Plaza

Email: niazk4317@gmail.com

Cell# 0300-5905409

①

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Service Appeal No 1909/2022

7367

Date: 16-12-2022

Mst: Noreen Nazli W/O Shah Faisal R/O Pakha Ghulam Pahari
Pura Tehsil and District Peshawar.....(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa Education Department, Peshawar
2. District Education Officer (Female) Education Department, Peshawar
3. Deputy District Education Officer (Female) Education Department, Peshawar.....(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal 1974 against the impugned orders bearing No Endst NO 5639-43/P.F/Mst: Noreen Nazli Sweeper (GGHSS) Nishterabad dated 15th July, 2022 and No 5424/P/F Mst: Noreen Nazli Dated Peshawar the 04th October, 2022; whereby major penalty of removal from service was imposed upon the Appellant

PRAYER IN APPEAL

On acceptance of this Appeal, the orders bearing No Endst NO 5639-43/P.F/Mst: Noreen Nazli Sweeper (GGHSS)

Filed to
Registrar
16/12/2022

- 5) That inspite of serious illness and do or die situation, the Appellant come to Education Department, but the high-ups informed the Appellant that he should to wait for further order and surprisingly received the impugned order dated 15-07-2022. (Copy of the order dated 15-07-2022 is attached as Annex 'D').
- 6) That thereafter, the Appellant submitted a departmental appeal on against the order dated 15-07-2022; but the prayer of Appellant was turned down vide impugned order No 5424/P/F Mst: Noreen Nazli Dated Peshawar the 04th October, 2022. (Copy of the grounds of appeal and order dated 04-10-2022 is attached as Annex 'E & F').
- 7) That feeling aggrieved from the orders, the Appellant having no other adequate and efficacious remedy, approaches before this Honourable Court for his reinstatement into service with all back benefits on the following grounds inter-alia:-

GROUND:-

- A) That the Appellant is the natural born citizen of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the fundamental rights of the Appellant have blatantly violated by the Respondents and the Appellant have been discriminated and has been denied his due rights

3

Nishterabad dated 15th July, 2022 and No 5424/P/F Mst:
Noreen Nazli Dated Peshawar the 04th October, 2022 may
graciously be set aside and the services of the Appellant may
'kindly be reinstated alongwith all back benefits.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

- 1) That the Appellant is the natural born citizen of Pakistan and is entitled for all the right guaranteed by the Constitution of Islamic Republic of Pakistan, 1973 and hails from a respectable family of District Swabi. (Copy of the CNIC is attached as Annex 'A').
- 2) That in fact, the Appellant was got recruited in the Education as (Sweeper). (Copy of the service card is attached as Annex 'B').
- 3) That the Appellant served his duty very honestly, sincerely and efficiently with full zeal and devotion.
- 4) That the Appellant was absent from his duty from 01st January, 2022 till 14th July, 2022 due to his serious illness. It is pertinent to mention here that the Appellant visited Hospital; where the Doctors advised some medical tests and after conducting of said tests, the result was beyond the imagination of Appellant, the Doctors finally come to conclusion that heart operation/surgery of the Appellant will be necessary. (Copies of the medical prescriptions are attached as Annex 'C').

under the Constitution of Islamic Republic of Pakistan, 1973.

- C) That this Honourable Court has in a number of judgments allowed the cases of similarly nature, however, the Respondents are depriving the Appellant from his fundamental rights.
- D) That once of the celebrated right to earn livelihood through lawful means is a basic fundamental right guaranteed not only by the constitution of the modern world but rather has a backing history spread over immemorial time in the stateless and even in the mediaeval ages. The Appellant seeks to enforce his said right and to remain peaceful citizen of the society in this modern era of globalization.
- E) That the impugned orders are against the norms of justice, illegal, unconstitutional and without authority, therefore, not tenable.
- F) That any other ground not raised here specifically may also graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that on acceptance of this Service Appeal, the orders bearing No Endst NO 5639-43/P.F/Mst: Noreen Nazli Sweeper (GGHSS) Nishterabad dated 15th July, 2022 and No 5424/P/F Mst: Noreen Nazli Dated

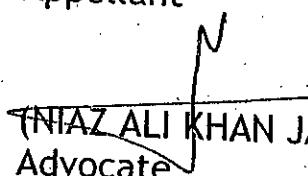
(5)

Peshawar the 04th October, 2022 may graciously be set aside and the services of the Appellant may kindly be reinstated alongwith all back benefits.

Any other relief not specifically asked for may kindly be extended in favour of the Appellant, in the circumstances of the case.

Appellant

Through:


(NIAZ ALI KHAN JAGHRA)
Advocate,
High Court, Peshawar

Dated:-14-12-2022

CERTIFICATE:

No such appeal has earlier been filed by the Appellant before any competent authority on the subject matter


Advocate

6

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Mst: Noreen Nazli.....(Appellant)

VERSUS

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

ADDRESSES OF THE PARTIES

APPELLANT


Mst: Noreen Nazli W/O Shah Faisal R/O Pakha Ghulam Pahari
Pura Tehsil and District Peshawar

RESPONDENTS

1. Government of Khyber Pakhtunkhwa through Secretary to
Government of Khyber Pakhtunkhwa Education Department,
Peshawar
2. District Education Officer (Female) Education Department,
Peshawar
3. Deputy District Education Officer (Female) Education
Department, Peshawar

Appellant

Through:


(NIAZ ALI KHAN JAGHRA)
Advocate,
High Court, Peshawar

Dated:-14-12-2022

7

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Mst: Noreen Nazli.....(Appellant)

VERSUS

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

AFFIDAVIT

I, Mst: Noreen Nazli W/O Shah Faisal R/O Pakha Ghulam Pahari Pura Tehsil and District Peshawar, do hereby solemnly affirm and declare on oath that all the contents of accompanied Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.

DEPONENT نورین نازلی
CNIC # 17301-9160861-4
Cell # _____

Identified by:-

(NIAZ ALI KHAN JAGHRA)
Advocate
High Court, Peshawar


14/12/22


3

حکومت پاکستان
 قومی شناختی کارڈ
 17301-9160861-4

نام:
 جنس: عورت
 شہر کا نام: شاہ فیصل
 شناختی نمبر: لاقی نمبر
 تاریخ پیدائش: 0/10/1971


امیدوار آجور
 دستخط:
 دستخط کارڈ

شناختی نمبر: 17301-9160861-4
 شناختی نمبر: U9Q3PJ
 ملاحظہ ہو کہ یہ کارڈ پاکستانی پورٹل پر کارڈ پر غلام، سسٹم و مشین پر مشتمل ہے

13593201262
 شناختی نمبر

تاریخ اجراء: 15/02/2014
 تاریخ منسوخ: 15/02/2024
 گمشدہ کارڈ یا غیر صحیح معلومات پر مشتمل ہے

"B"



Dist. Govt. KP-Provincial
District Accounts Office Peshawar Dist.
Monthly Salary Statement (December-2020)

Person's Information of Mr NOREEN NAZLI d/w/s of ABDUL WADOOD
 Account Number: 00434955 CNIC: 1730191608614
 Entry into Govt. Service: 19.11.2008

NTN:
 Length of Service: 12 Years 01 Months 014 Days

Employment Category: Active Temporary

80004245-DISTRICT GOVERNMENT KHYBE
 HEAD MISTRESS G.G.H S. NISHTER ABAD PESHAWAR CITY.
 GPF Section: 001 Cash Center:
 Interest Applied: Y- GPF Balance: 37,378.00
 Pay Scale Type: Civil BPS: 03 Pay Stage: 12
 Pay scale: BPS For - 2017

Wage type		Amount	Wage type		Amount
1001	Basic Pay	14,290.00	1001	House Rent Allowance 45%	2,120.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
1516	Dress/ Uniform Allowance	150.00	1567	Washing Allowance	150.00
2148	15% Adhoc Relief All-2013	285.00	2199	Adhoc Relief Allow @ 10%	209.00
2211	Adhoc Relief All 2016 10%	1,064.00	2224	Adhoc Relief All 2017 10%	1,429.00
2247	Adhoc Relief All 2018 10%	1,429.00	2264	Adhoc Relief All 2019 10%	1,429.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-300.00
3990	Emp. Edu. Fund KPK	-60.00	4004	R. Benefits & Death Comp	-300.00

Deductions - Loans and Advances

Loan Description	Principal amount	Deduction	Balance
6503 MCYC Loan Principal Insta	22,610.00	-665.00	22,610.00
6505 GPF Loan Principal Instal	0.00	-1,000.00	0.00
6505 GPF Loan Principal Instal	0.00	-2,000.00	68,000.00

Deductions - Income Tax

Payable: 0.00 Recovered (till DEC-2020): Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 25,840.00 Deductions: (Rs.): 5,095.00 Net Pay: (Rs.): 20,745.00

Payee Name: NOREEN NAZLI
 Account Number: 4149910878
 Bank Details: NATIONAL BANK OF PAKISTAN, 230387 PESHAWAR CITY PESHAWAR CITY.

Leaves: Opening Balance: Aailed: Ermed: Balance:

Permanent Address:

City: P

Domicile: -

Housing Status: No Office

Temp. Address:

City:

Email: noreennazli@gmail.com

System generated document in accordance with APPM 4.6.12.9/SERVICES
 * All amounts are in Pak Rupees
 * Errors & omissions excepted

Monthly Salary Statement (July-2021)

10

Personal Information of Mr NOREEN NAZLI d/w/s of ABDUL WA DOOD

Personnel Number: 00434955 CNIC: 1730191608614
Date of Birth: 10.10.1971 Entry into Govt. Service: 19.11.2008

NTN:
Length of Service: 12 Years 08 Months 014 Days

Employment Category: Active Temporary

Designation: SWEEPER

8004245-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6122-HEAD MISTRESS G.G.H.S. NISHTER ABAD PESHAWAR CITY.

Payroll Section: 002

GPF Section: 001

Cash Center:

GPF A/C No: V.P. 98

Interest Applied: Yes

GPF Balance: 59,768.00

Vendor Number: 30350688 - NOREEN NAZLI 01-1009126-7 ABL

Pay scale: BPS.For - 2017

Pay Scale Type: Civil BPS: 03

Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,290.00	1004	House Rent Allow 45% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	285.00	2199	Adhoc Relief Allow @10%	209.00
2211	Adhoc Relief All 2016 10%	1,064.00	2224	Adhoc Relief All 2017 10%	1,429.00
2247	Adhoc Relief All 2018 10%	1,429.00	2264	Adhoc Relief All 2019 10%	1,429.00
2309	Adhoc Relief All 2021 10%	1,429.00	2311	Dress Allowance - 2021	1,000.00
2312	Washing Allowance 2021	1,000.00	2313	Integrated Allowance 2021	600.00
5002	Adjustment House Rent	1,422.00	3026	Adj Dress/Uniform Allowan	850.00
5070	Adj Washing Allowance	850.00	3288	Adj Integrated All 2005	150.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-600.00
3990	Emp.Edu. Fund KPK	-60.00	4004	R. Benefits & Death Comp:	-300.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6503	MCYC Loan Principal Insta	39,900.00	-665.00	17,955.00
6505	GPF Loan Principal Insta	70,000.00	-2,000.00	54,000.00

Deductions - Income Tax

Payable: 0.00 Recovered till JUL-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 34,263.00 Deductions: (Rs.): -4,395.00 Net Pay: (Rs.): 29,868.00

Payee Name: NOREEN NAZLI
Account Number: 4149910728
Bank Details: NATIONAL BANK OF PAKISTAN, 230387 PESHAWAR CITY PESHAWAR CITY.

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: P

Temp. Address:


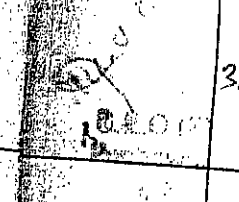
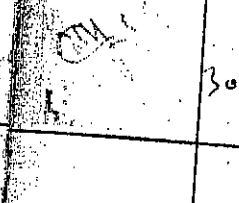

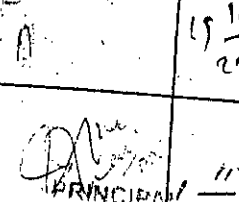
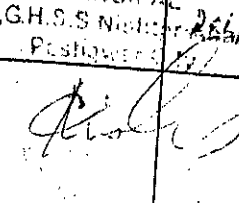
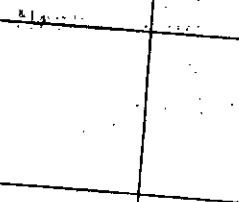
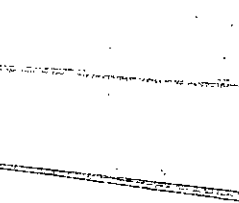
City:

Domicile: -

Housing Status: No Official

Email: noreennazli@gmail.com

System generated document in accordance with APPM 4.6.12.9(87333/12.07.2021.v3.0)
* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/17.07.2021/00.28.25)

 Peshawar	$30 \frac{6}{296}$	Scale Ms				Under taking		
						Notice	Notice	Notice
	$30 \frac{11}{296}$	of m				to me	to me	to me
	$30 \frac{6}{297}$	Scale Ms				Notice	Notice	Notice
						Notice	Notice	Notice
	$15 \frac{10}{297}$	Transf				Transferred to	Transferred to	Transferred to
 PRINCIPAL S.G.H.S. No. 1 Peshawar	11	Transf				Transferred to	Transferred to	Transferred to
	12 1297					Transferred to	Transferred to	Transferred to
		Service Verified w.e.f 11/12/2015 to 7/12/2016 From App Roll of the Record of this School				Transferred to	Transferred to	Transferred to
 Peshawar City						Transferred to	Transferred to	Transferred to

14/3/16

17

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant
MCC Post		B.A. - 1st	Rs. 4800 - 100 - 9000				
G. H. S. S. S.			L	55507	P.M.	1 ¹² / ₂₀₁₂	
5550 150 5700			L	57007	P.M.	1 ¹² / ₂₀₁₂	

Signature of Government Servant

12

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state if substantive appointment, or if whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "p"	7 Date of appointment	8 Signature of Government Servant
Swaraj Post G.G.P.S. Pakha Chulani Pashi			B-01 (Rs. 2970-90-5670)				
			Rs. 2970/-			19/11/2008	[Signature]
			Rs. 2970/-			1/12/08	[Signature]
			Rs. 3060/-			1/12/09	[Signature]

[Handwritten mark]

[Handwritten text]

20

1. Name: _____

2. Residence: Pakha, Ghulam, Lalpura

3. Father's name and residence: Abdul Wahid

4. Date of birth by Christian era as nearly as can be ascertained: 10-10-1971

5. Exact height by measurement: _____

6. Personal marks for identification: NIL

8. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government Servant: _____

10. Signature and designation of the Head of the Office, or other Attesting Officer.


ATTESTED

Attested

<u>10/10/71</u>	<u>10/10/71</u>		
<u>10/10/71</u>	<u>10/10/71</u>		

(21)

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "p"	7 Date of appointment	8 Signature of Government Servant
Sweet							
Comm. Sub. Lab. Off.			8355/-			8 ² / ₂₅ 16	
		B.P. 3-	8040-325	17790			
			10315/-			7 ⁷ / ₂₇ 6	
			10640/-			12 ¹² / ₂₇ 6	
			9610-350-	21310			
Shiller's			12730/-			7 ⁷ / ₂₇ 7	
Sub. Lab. Off.			12730/-			20 ¹² / ₂₇ 7	
			13120/-			12 ¹² / ₂₇ 7	
			13510/-			12 ¹² / ₂₇ 7	

ATTESTED


etc.)	Period	Government to which debitale	Service
Principal G.G.H.S.S Nishtar Abad Peshawar	TR no. 131 of 10/2/14 Dis. Rs. 1730/- on A/c of Govt of P.W.D. of 10/2/14		
Principal G.G.H.S.S Nishtar Abad Peshawar City	TR no. 10/2/14		
Principal G.G.H.S.S Nishtar Abad Peshawar			13/2/14
Principal G.G.H.S.S Nishtar Abad Peshawar			Service Verified w.d. 1-12-13 to 29-11-2014 From Acq. Roll & Other Office Record of this School
Principal G.G.H.S.S Nishtar Abad Peshawar			Principal G.G.H.S.S Nishtar Abad Peshawar
Principal G.G.H.S.S Nishtar Abad Peshawar			
Principal G.G.H.S.S Nishtar Abad Peshawar	TR No. 402 Drawn Rs. 3452/- Pay & Allowance B.P.S.-3 W.d. 7-10-15	15-11-15	
Principal G.G.H.S.S Nishtar Abad Peshawar			Service Verified w.d. 1-12/14
Principal G.G.H.S.S Nishtar Abad Peshawar City	TR no. 402 Drawn Rs. 3452/- Pay & Allowance B.P.S.-3 W.d. 7-10-15	15-11-15	

Refer to SMO
for medication
fitness

"C" Cardio
23 OPD

Appointment Time : 10:22

Amount Paid : 20
Invoice No : K02211605570

Invoice Date : 07-OCT-21 09:09

ID : K0200003890979
Sex : Female
Type : REGULAR
Ref : SHAHID IQBAL

Name : Noreen Nazli
Age : 49 Year(s)
Clinic : FILTRATION CLINIC
HTN

Father / Husband Name : SHAH FAISAL
District : Peshawar
Room No :
Counter : MAIN OPD

Vertigo
B.P. 130/80

Ad Echo (free pt is poor)
ECG

Prob
Echo Free
OK

60 C.B.A.

Right Hand. L. Hand.
150/110
B.P. - 160/130
Temp - AF

Amount Paid : 20
Invoice # : K02211599519
Invoice Date : 06-OCT-21 12:19:05

ID : K0200021621218
Sex : Female
Husband Name : SHAH FAISAL
Department : EMERGENCY
Ref : MURAD ALI

Name : Noreen Bibi
Age : 48 Year(s)
District :
Counter : EMERGENCY
HNT

YELLOW
YELLOW

Sp. Tab Digoxin P.
141
Tab. Labifem 2g
141

N

Lady Reading Hospital, MTI Peshawar

Lady Reading Hospital, MTI Peshawar Phone: 091-9211430, Fax: --
Email: info@lrh.edu.pk, Website: www.lrh.edu.pk



25

ECHOCARDIOGRAPHY REPORT

M.R.No : K0200003890979
Name : NOREFN NAZLI
DOB/Age : 23-DEC-71 / 49 Year(s)
Gender : Female
Height(cm) : 165
CMT : 0.326 - LCHD
Indications : Chest Pain
Visit Date : 07-OCT-21
Referred by :
IP/OP : OPD
Report Date : 07-OCT-21
Weight(Kg) : 79
Medical History :

M-Mode / 2-D Measurements

		Normal *			Normal
LVSD (Systolic)	32	bundle(<35)	LVDD (Diastolic)	46	mm (< 52)
Septal Thickness	12	bundle(<11)	Posterior Wall Thickness	12	mm (< 11)
Left Atrium Diameter	33	bundle(<40)			
RV EDD	20	bundle			

Chambers:

Left Ventricle :

Normal size left ventricle. Wall thickness is normal. Mild concentric left ventricular hypertrophy noted. Preserved left ventricular systolic function. Visually estimated ejection fraction is approximately 60 %. Mitral inflow shows E/A reversal. Left ventricular diastolic dysfunction grade I.

LV Diastolic Function:

Valve

Aortic :

Mild regurgitation.

Study Quality:

Study quality is adequate.

Pericardium:

Pericardium is normal.

CONCLUSION

RECOMMENDATION:

LVH
LV DIASTOLIC DYSFUNCTION
MILD AR.

DR. IKRAM ULLAH; Assistant professor
MBBS, FCPS(CARDIOLOGY)

Electronically verified by, no signature(s) required.

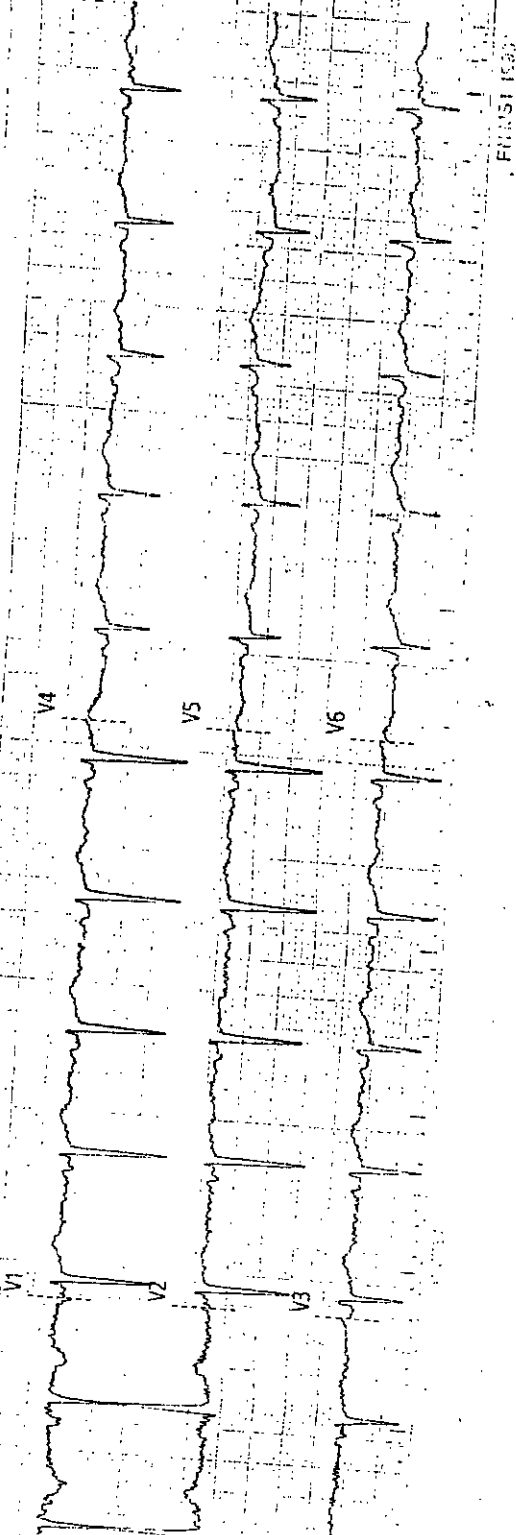
© Shamkat Khanum Memorial Trust (2000-2014). All rights reserved.
07-10-2021 10:32 AM - FAISAL RAZA - LRH-1183

Page 1 of 1
S41REP00027

Official concerned

ECG Report

No. : 20180916100918
Name :
Gender :
Age :
Dept :
Bed No. :

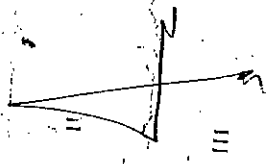
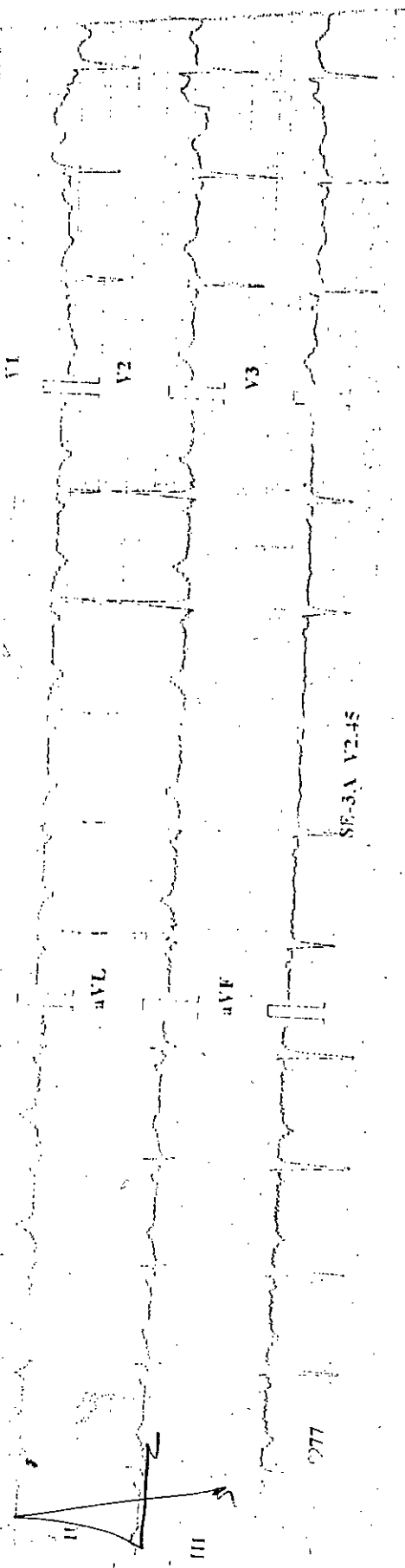


FINST 1500

01-09-2021 12:20:56

NOORDEZ

0.67-25Hz AC500



277

SF-3A V2-45

6. Official concerned:



D 27

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
PESHAWAR. E-mail: edo@peshawar. Tel. 091-9225459

NOTIFICATION

1. WHEREAS Principal GGHSS Nishterabad Peshawar reported vide letter No. 161 dated. 28/04/2022 that Mst. Noreen Nazli Sweeper GGISS Nishterabad is not regular, punctual & often remain absent from duty.
2. AND WHEREAS this office has conducted an inquiry vide this office order No.2447-48/P.E/Noreen Nazli Sweeper dated 24/05-2022.
3. AND WHEREAS this office issued charge sheet and statement of allegation to official concern through the principal vide this office letter # 2583 dated 23/05/2022.
4. AND WHEREAS the inquiry officer submitted the inquiry report to this office vide her letter # 3298 dated 25-06-2022 with the recommendation that the penalty of removal or compulsory retirement from service under the rules, in order to implement the E&D rules and discourage the practices of unprofessional attitude among other staff members
5. AND WHEREAS The competent authority, District Education Officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charge of misconduct/willful absence from duty against the accused has been proved.
6. AND NOW THEREFORE, in exercise of the powers conferred under Rules 4 (1) (b) (ii), of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, the competent authority, District Education Officer (F) Peshawar, is pleased to impose a penalty of **"COMPULSORY RETIREMENT FROM SERVICE"** upon Mst. Noreen Nazli Sweeper GGHSS Nishterabad Peshawar with immediate effect. The period of her absence w.e.f the month of January 2022 till date is hereby treated as un-authorized absence from duty without pay.

Note: Entry to this effect should be made in her service book.

District Education Officer
(Female) Peshawar

Endst: No. 5639-43 / P.E/Mst. Noreen Nazli Sweeper GGISS Nishterabad dated 15/7/2022

- Copy forwarded to the:-
- Accountant General Khyber Pakhtunkhwa, Peshawar
 - Director G.I.S.E Khyber Pakhtunkhwa Peshawar
 - Deputy Commissioner Peshawar
 - DMO, LMA Peshawar
 - Principal GGHSS Nishterabad Peshawar with the remarks to follow up the instructions issue above
 - Official Concerned File

ATTESTED

[Signature]

6. Official concerned.

Better Copy

27

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)

PESHAWAR E-mail.emisi.peshawar, Tel 091-9225459

NOTIFICATION

1. **AND WHEREAS** Principal GGHSS Nishterabad Peshawar reported vide letter No. 161 dated 28/04/2022 that Mst. Noreen Nazli Sweeper GGHSS Nishterabad is not regular punctual & often remain absent from duty.
2. **AND WHEREAS** this office has conducted inquiry vide this office order No. 2447-48/P-F/Noreen Nazili Sweeper dated 24/05/2022.
3. **AND WHEREAS** as the office issued charge sheet and statement of allegation to official concern through the principal vide this office letter 2583 dated 23/05/2022.
4. **AND WHEREAS** the inquiry officer submitted the inquiry report to this office vide her letter # 3298 dated 25/06/2022 with the recommendation that the penalty of removal or compulsory retirement from service under the rules, in order to implement the E&D rules and discharge the practice of unprofessional attitude among other staff members.
5. **AND WHEREAS** The competent authority, Education officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charge of misconduct/willful absence from duty against the accused has been proved.
6. **AND WHEREAS**, in exercise of the powers conferred under Rules-4 (i) (b) (ii) of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011, the competent authority, District Education Officer Peshawar is pleased to impose major penalty of 'COMPULSORY RETIREMENT FROM SERVICE, upon Mst. Noreen Nazili Sweeper Nishterabad Peshawar to immediate effect. The period of her absence w.e.f the month of January till date is hereby treated as un-authorized absence from duty without pay.

Note: Entry to this effect should be made in her service book.

District Education Officer
(Female) Peshawar

Endst No. 5639-43/P.F/Mst. Noreen Nazili Sweeper GGHSS Nishterabad dated 15/07/2022.

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Peshawar.
4. DMOLMA Peshawar.
5. Principal GGHSS Nishterabad Peshawar with the remarks to follow up the instructions issue above.
6. Official concerned.

1st dose

28

sent to: PCR

OUTDOOR PATIENT TICKET

Facility Name : Covid-19 Hospital

Nishtarabad, Peshawar -KPK

Name: Nowreen Age: 47 Sex: F

Father's / Husband's Name: Shah Fasil

Monthly OPD Serial No.: 29272/-

Provisional Diagnosis:

Date

Clinical Findings/Investigation/Treatment/Referral/Test Findings



04/09/21

EWIC# 17301-9160561-4

0316-9277981

Spo. = 98% at RA

Cough
Fever } 5 days
GBA

→ Tas. Cephal 400
(10) 2hr @

- Tas. Cipro 100
35% 1hr @

- Cip Combi 2 inhaler

○ + E₁ + ○ + ○

- Spp Acet 10 2hr @

Tas. Nibant 1hr @

ATTESTED

6. Official concerned.

شاہ ڈائریکٹر آف ایجوکیشن، سیٹاپ

(29)

عنوان: درخواست عمر ادائیگی سروس

جناب عالی! گزارش ہے کہ سائل ایک عزیز محترم ہے، چھوٹے چھوٹے بچے ہیں، کم ایمنگ ٹیم میں ریٹائرمنٹ پر ہیں

سائل عمر 2008 سے مختلف سرکاری سکولوں میں بحیثیت خانہ روہ سروس ایجا کر دے رکھا ہے

خانہ داری مسائل کی وجہ سے سائل کچھ دنوں ڈیوٹی سے ڈیوٹی سے غیر حاضر رہے لیکن اسکی باقاعدہ اطلاع سکول کی ریٹائرمنٹ میں دی گئی اور انجمنی اجازت پر سائل چھٹی پر رہے۔

لیکن جب سائل دوبارہ سکول کی بنیاد پر اپنی ڈیوٹی پر آئے تو سکول کے فلکس (بنالی) سے پتہ چلا کہ اسے سروس سے بحری طور پر ریٹائر کر دیا گیا ہے اور اس کا آرڈر بھی آجیا ہے۔ سائل کو عینے پر بتایا گیا کہ یہ کیسا مسئلہ ہے، ہم آپ کی قسم درخواست چھوڑ کر آپ کی سروس بحال کروادیں گے لیکن ابھی تک اس پر کوئی عمل نہیں کیا گیا۔

10F2

30

جناب عالی، آپ سے گزارش ہے کہ اس ٹیکر کا نووائی کے متعلق

سائل کی قسم کی اطلاع آپیں دی گئی اور نہ Show Cause

نوش سائل کی وصول ہوا اور ایک طرفہ کاروائی کروا کر جبری

ریٹائرمنٹ کا آرڈر جاری کروا دیا گیا۔

جسنادہ اوپر سائل بیان کر چکی ہے کہ غریب عورت ہے اور

دیجیٹل تقریباً 3 ماہ سے تنخواہ بھی بند ہے حکم کا کر ایہ ادا نہ کرنے

کی وجہ سے ملک مکان کے کچھ خالی کمرے بنا بھی کیم دیا ہے۔

آپ جناب سے گزارش ہے کہ اس ضمن میں سائل کی مدد فرمائی

جائے اور سائل کو دوبارہ اس کی سرروسی پر بحال کیا جائے تاکہ

وہ اپنا اور اپنے بچوں کا پیٹ وال سیکے۔

سائل ٹیکر آپ اور آپ کے اہل و عیال کے لیے دعا

گو رہے گی۔

عید نواز کا بیوی

لوہینا ناز

سائل کا نام: لوہینا ناز

عہدہ: خاتون (Sweeper)

دائلم نمبر: 0316-927798

نوٹ: جبری ریٹائرمنٹ آرڈر ٹیکر ہے۔

2022

ATTESTED

[Signature]

Official Concerns

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
PESHAWAR.

No. 424 /P/F Mst. Noreen Nazli
Dated Peshawar the: 01/08/2022

To

The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

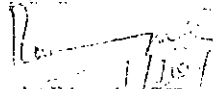
Subject: DEPARTMENTAL APPEAL RE-STATEMENT MST NOREEN NAZLI
EX SWEEPER GGHSS NISHTERABAD PESHAWAR.

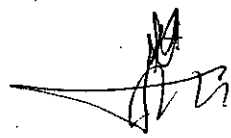
Memo:

Kindly refer to your letter No: 4815/F.No. /A-20/C-IV/ Noreen Nazli Ex Sweeper
P/FILE dated Peshawar the 05-08-2022 on the subject cited above and to submit history of the case
regarding Compulsory retirement of Noreen Nazli Ex - Sweeper Govt. Girls High Secondary School
Nishterabad Peshawar is as follows:-

1. Principal concerned reported vide her letter No. 125 dated 30.03.2022 that the above official
is habitual absent from duty and does not bother about school duty. (Copy Attached)
2. In the meanwhile another report of absence received from the Principal concerned in which
she reported that the sweeper concerned is again absent from duty and submitted the pay
stoppage source vide her letter No. 140 Dated 18-08-2022. The concerned Principal has
then submitted another report of absence that she was still absent from duty along with prof
vide her letter No. 161 dated 28-04-2022. (Copy Attached)
3. This office has appointed Mst Balqees Saithi Principal GGHSS Jogiwara as an enquiry
officer to conduct the enquiry against the Mst Noreen Nazli Sweeper GGHSS Nishterabad
and ask to submit the detail report along with clear cut recommendation vide this office
Endst No. 2447-48 Dated 21-05-2022. (Copy Attached)
4. The competent authority issued the charge sheet to Mst Noreen Nazli Sweeper GGHSS
Nishterabad Peshawar along with statement of allegation under the rule 3 (a), (b) & (c) 2011
vide letter No. 2583 Dated 23-05-2022. (copy attached)
5. The official concerned did not appeared or submitted any reply to her charge sheet notice
to this office till date.
6. The enquiry officer conducted the enquiry and submitted the report along with the evidence
and record and recommended that due to absence from duty, she may be removed from
service or be compulsory retired from service.
7. As the official neither appeared nor submitted any reply to his Charge Sheet, after having
considered the charges, evidence on record, and facts of the case and keeping in view the
recommendations of the enquiry officer, the competent authority exercised the power
conferred under the rule 4 (i) (b) (ii) Khyber Pakhtunkhwa by imposing the major penalty
of compulsory retirement upon Mst. Noreen Nazli Ex Sweeper GGHSS Nishterabad
Peshawar has compulsory retire from service. (Copy Attached)

The report is submitted as desired for taking further necessary action.


Dy: District Education Officer,
(Female) Peshawar.





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

No. _____ /F.No./A-20/C-IV/Noreen Zali Sweeper/Peshawar

Dated Peshawar the 20 / 10 /2022

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

The District Education Officer
(Female) Peshawar.

32

Subject: **DEPARTMENTAL APPEAL RE-INSTATEMENT MST. NOREEN NAZLI
EX-SWEEPER GHSS NISHTERABAD PESHAWAR.**

Memo:

I am directed to refer to your letter No 5423 dated 04/10/2022 on the subject cited above and to ask you that the appeal in r/o Mst. Noreen Nazli Ex-Sweeper GHSS Nishterabad Peshawar has been examined/analyzed by this office. Hence inform the appellant concerned that his appeal has been **rejected** by the appellate authority.

sd/

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Endst; No. 2279

Copy forwarded to the: -

1. Mst. Noreen Nazli Ex-Sweeper GHSS Nishterabad Peshawar.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

JF 20/10/22

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

M. 29/10/22

ATTESTED

Attested

[Signature]

قیمت 50 روپے	47454			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: BC-11505		رابطہ نمبر: 03008905409		

بعد اات جناب: سروس ٹرا ایبیونل لنڈر

منجانب: <u>سید اسحاق علی</u>	دعویٰ:
 <p>سماں نوویس نازکی بنام ڈاکٹر سید اسحاق علی</p>	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام سید اسحاق علی کے لیے سید اسحاق علی کو وکیل مقرر کر کے قرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور مہینوں، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل باجزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر اختیار منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جہانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



الرقوم:

Mob 03008905409

0300892972

نوٹ: اس وکالت نامہ کی کوئی تا قابل قبول ہوگی۔

BC 11505

03168927798

مخبر نوویس نازکی ایف جی

نورین نازکی