


FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1911/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/12/2022	<p>The appeal of Mst. Saima Mehmood resubmitted today by Mr. Javed Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad 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. Saima Mehmood D/O Qazi Mehmood-ul-Hassan/o Laban Bandi Tehsil and District Haripur received today i.e. on 20.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of impugned order dated 03/11/2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.

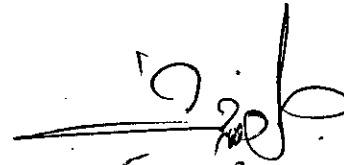
No. 3676 /S.T,

Dt. 21-12 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Javed Ali Adv.
High Court Pesh.

The order dated 03-11-2022 as mentioned in heading of plaint is already attached as Annexure "M" page 76-77 therefore the same may kindly be accepted.


Javed Ali
Adv

23/12/22

0313-9551364

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

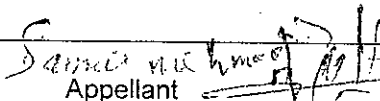
Service Appeal No. 911 /2022

Mst. Saima Mehmood *VERSUS* Secretary E & SE KPK Peshawar & Others

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Dated: December 19, 2022


 Appellant
 Through JAVED ALI
 Hajra Noreen
 Advocates High Court, Peshawar

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1911 /2022

Mst. Saima Mehmood D/O Qazi Mehmood Ul Hassan R/O Laban Bandi Tehsil and District Haripur
.....Appellant

VERSUS

1. Secretary Elementary & Secondary Education (E & SE) Khyber Pakhtunkhwa, Peshawar
2. Director Elementary & Secondary Education (E & SE) Khyber Pakhtunkhwa, Peshawar
3. Deputy Director Elementary & Secondary Education (E & SE) Khyber Pakhtunkhwa, Peshawar
4. District Education Officer (Female) District Haripur
5. Executive District Officer Elementary & Secondary Education, Haripur.
6. The Director General Federal Directorate of Education Islamabad
7. The Director Schools (Female) Federal Directorate of Education, Islamabad.
.....Respondents

APPEAL U/S 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION ENDST NO. 5317-21/F NO. AD (LIT-II) NOTIFICATION : 26-09-2022 OF RESPONDENT NO. 2 COMMUNICATED VIDE ORDER DATED:03/11/2022.

Prayer in Appeal:

On the acceptance of this Appeal, the impugned order contained in Notification Endst No.5317-21/F.No.AD(Lit-II)/Notification/2022 Dated 26/09/2022 alongwith Notification Dated 07/04/2016 and Letter No.9811-15 Dated 20/10/2016 may please be set aside and the Respondents may kindly be directed to accept the arrival report of the Appellant already submitted to Respondent No.4 to allow the Appellant for resumption of duty alongwith all back benefits of service including Salary & increments from the Date of Arrival till onward accordingly.

Respectfully Sheweth:

The brief facts and background of the instant Service Appeal are as under:

FACTS:

1. That the Appellant joined the Service as PST at GGPS Laban Bandi Tehsil and District Haripur in Elementary & Secondary Education KPK on 30/10/1988.
(Copies of extracts from Service Book are annexed as Annexure "A", "A1", "A2" "A3", "A4", "A5", "A6", "A7", "A8", "A9", "A10", "A11", "A12", "A13")
2. That the Appellant was deputed to the Federal Directorate of Education Islamabad for initial period of 03 years in her own Pay/Grade & Scale i-e MTT (B-12) by the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide Order bearing Endst.No.SO(PE)5-2/118 Saima Mehmood PTC Dated 03/09/2007 and accordingly, the Appellant joined the Federal Directorate of Education Islamabad.
(Copy of Order Dated 03/09/2007 is annexed as Annexure "B")

2

3. That the initial period of deputation of the Appellant was subsequently extended by the competent authority and not objected by the Respondent No.5 in this behalf.
(Copy of the NOC is annexed as Annexure "C")
4. That during the period of extended deputation of the Appellant at Federal Directorate of Education Islamabad, the Respondent No.6 vide Letter No.F.2013/P.A-Dep/14-16-17/(W)FDE Dated 12/09/2013 asked the Respondent No.1 to issue NOC/consent from her parent Department for the permanent absorption of the Appellant. This Letter contained the detailed conditions in shape of **Attention:** and also at S.No.4 that this Letter does not confer any right or claim of permanent absorption.
(Copy of Letter Dated 12/09/2013 is annexed as Annexure "D")
5. That accordingly, the Respondent No.1 vide Order bearing No.SO(PE)5-2/IPT/Haripur/Saima/PST/2013 Dated 30/09/2013 placed the services of the Appellant at the disposal of Respondent No.6 on permanent basis. It is worth to mention here that the Respondent No.1 while issuing the instant Letter/NOC did not take into consideration the conditions as embodied at S.No.3 Attention: of the Respondent No.6 Letter Dated 12/09/2013.
(Copy of Order dated 30/09/2013 is annexed as Annexure "E")
6. That the Appellant on 08/05/2014 applied to the Respondent No.6 for grant of Ex-Pakistan Leave without pay for a period of 05 years w.e.f 01/06/2014 to accompany her family and her husband being an official of Ministry of Foreign Affairs then posted at Pakistan Mission in Kyiv, Ukraine which however, was processed through Letter No.F.5-34/2014-FDE(S) Dated 21/07/2014 with remarks that **"Only her parent Department can Sanction this Leave"** which expressly reflects and confirms that the Appellant till then was not permanently absorbed and was still on the strength of her parent Department at Haripur.
(Copy of the Application alongwith Letter Dated 21/07/2014 are annexed as Annexure "F" "F1")
7. That in response to the Letter No.F-5-34/2014-FDE (S) Dated 21/07/2014, the parent Department of the Appellant i.e Respondent No.4 vide Letter bearing Endst No.3725-127 Dated 04/08/2014 Sanctioned/granted the Ex-Pakistan Leave without pay w.e.f 25/07/2014 to 24/07/2016 to the Appellant (Mst. Saima Mehmood PST (Deputationist) under the provisions of Leave Rules, 1981 and also issued NOC No.3730 Dated 04/08/2014 alongwith Letter No.3728 Dated 04/08/2014. Moreover, the Letter bearing Endst No.3725-127 Dated also mentioned in Note that necessary entry to this effect should be made in the Service Book of the Appellant which was duly endorsed in the Service Book.
(Copy of the Letter dated 04/08/2014 & Extract from Service Book annexed as Annexure "G", "G1", "G2")
8. That accordingly, after the proper and formal approval of the Ex-Pakistan Leave w.e.f 25/07/2014 to 24/07/2016, the Appellant went abroad alongwith her family but in the absence of the Appellant, the Respondent No.6 vide Letter No.F.1-9/141-MTT(Deputationist)FDE Dated 19/01/2015 repatriated the Appellant with immediate effect to her parent Department with directions to report back to her parent Department. Moreover, the same Letter was copied/sent to the Respondent No.1 to 4.
(Copy of the Letter Dated 19/01/2015 & Passport etc are annexed as Annexure "H", "H1", "H2", "H3", "H4", "H5", "H6", "H7", "H8", "H9")
9. That upon receiving the repatriation letter Dated 19/01/2015 by the Respondent No.4 without considering the facts and circumstances issued letter bearing Endst No.9811-15/DEO (F)/Haripur/Estb;Pry/Cancellation EPL Dated Haripur the 20/10/2015 vide which the already granted Ex-Pakistan Leave of the Appellant was cancelled and more interestingly, the Leave Sanctioning Notification No.3725-27 Dated 04/08/2014 was declared as null & void being sanctioned without lawful authority and simultaneously declaring the Appellant as absent since 04/08/2010. This misappropriation and misuse of authority was done at such time when the Appellant was abroad after fulfilling all the codal and service formalities in this behalf. In addition to the above, the Respondent No.4 vide Letter No.9818-24/DEO (F)/Haripur/Estb;Pry/Discp Act Dated 21/10/2015 also

issued an Absence Notice against the Appellant which also was done by altogether bulldozing the principles of justice and fair play.
(Copies of Cancellation Letter Dated 20/10/2015 is annexed as Annexure "I", "I-1")

10. That THE Appellant when returned back alongwith her family to Pakistan got the knowledge of all the illegal, unlawful and unfair proceedings by the Respondents against her for which the Appellant forthwith submitted her arrival report to the Respondent No.4 on 09/02/2016 however, the Respondent No.4 instead of accepting the Arrival report issued a Show Cause Notice vide Endst; No.1440-44/DEO (F) Haripur/Estab;Pri/Saima Mehmood Dated Haripur the 18/02/2016 which accordingly was replied on 19/02/2016.
(Copy of Show Cause dated 18/02/2016 and reply Dated 19/02/2016 annexed as Annexure "J", "J1")
11. That subsequently, through Notification bearing Endst; No.2969/DEO (F) Haripur/Estb;Pry/Saima Mehmood EX-PST Dated Haripur the 07/04/2016 wherein the authority concerned i-e Respondent No.4 expressly stated that the Departmental proceedings initiated against the Appellant were started in ignorance which are hereby withdrawn and the Appellant was directed to resort to the Respondent No.6 Department for relief being no more employee of the Respondent No.4 vide Letter No.SO(PE)5-21/IPT/Haripur/Saima/PST/2013 Dated 30/09/2013.
(Copy of the Notification dated 07/04/2016 annexed as Annexure "K")
12. That being aggrieved by the decision of Respondent No.4, the Appellant preferred a Departmental Appeal to the Respondent No.2 on 12/04/2016 however, was responded within a stipulated period for which the Appellant filed a Service Appeal No.1258/2016 which was remitted back to the Respondent No.2 for decision in accordance with relevant Law/Rules after thorough Scrutiny of the record within a period of 60 days.
(Extract from Departmental Appeal & Judgment Dated 20/06/2019 annexed as Annexure "L" to "L1", "L2", "L3", "L4", "L5", "L6", "L7", "L8", "L9", "L10", "L11", "L12", "L13")
13. That the Appellant was constrained to file a C.M No.125/21 Dated 05/07/2021 for the implementation of order Dated 20/06/2019 however, the same was ultimately decided vide Notification Endst No.5317-21/F.No.AD(Lit-II)/Notification/2022 Dated 26/09/2022 whereby the Departmental Appeal of the Appellant was rejected and was confirmed vide Order Dated 03/11/2022 of this August Tribunal.
(Copies of C.M dated 05/07/2011, Notification Dated 26/09/2022 and Order Dated 03/11/2022 are annexed as Annexure "M" to "M1", "M2", "M3", "M4", "M5", "M7")
14. That the Appellant being aggrieved by the Notification Endst No.5317-21/F.No.AD(Lit-II)/Notification/2022 Dated 26/09/2022 and Order Dated 03/11/2022 (received to the Appellant on 07/12/2022) is preferring this Appellant on the following grounds inter alia.

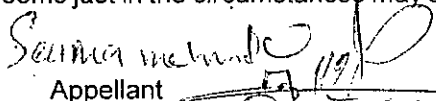
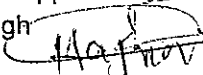
Grounds:

- a- That the impugned Notification/order is unjust, against the ground realities and is liable to be set aside.
- b- That the impugned order is against the principles of Natural Justice.
- c- That the impugned order is against the service rules therefore not tenable in the eyes of law.
- d- That the Appellant has not been properly heard rather a flimsy order has been passed being not maintainable in the eyes of Law.
- e- That the available record has altogether been overlooked or intentionally not kept under consideration by the Respondents hence, the order is liable to be interfered.
- f- That the Appellant has not been provided an opportunity of cross examination hence, this order is liable to be set aside on this score alone.
- g- That the impugned Notification is against the E & D Rules, 2011.

- (u)
- h- That the reasons given in the impugned Notification are contradictory and in utter violation of the Service record.
 - i- That this impugned order is not a judicious order hence is void and ineffective upon the rights of the Appellant.
 - j- That the Cancellation of Leave etc proceedings have been conducted in the absence of the Appellant which is illegal and is liable to be interfered and struck down by this August Tribunal in its exclusive jurisdiction in this matter.
 - k- That any other ground will be raised at the time of arguments with prior permission of this August Tribunal.

It is therefore, most humbly prayed that on the acceptance of this Appeal, the impugned order contained in Notification Endst No.5317-21/F.No.AD(Lit-II)/Notification/2022 Dated 26/09/2022 alongwith Notification Dated 07/04/2016 and Letter No.9811-15 Dated 20/10/2016 may please be set aside and the Respondents may kindly be directed to accept the arrival report of the Appellant already submitted to Respondent No.4 to allow the Appellant for resumption of duty alongwith all back benefits of service including Salary & increments from the Date of Arrival till onward accordingly. Any other relief not specifically prayed for which this Hon'ble Court deems just in the circumstances may also be granted accordingly.

Dated: December 19, 2022.


Appellant
Through  Javed Ali
Hajra Noreen

Muhammad Haroon

Umair Khan

Naveed Khan
Advocates High Court, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2022

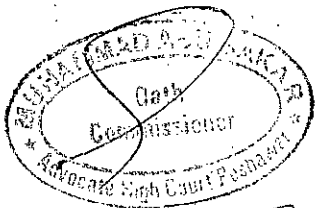
Mst. Saima Mehmood VERSUS Secretary E & SE KPK Peshawar & Others

AFFIDAVIT

I, Mst. Saima Mehmood D/O Qazi Mehmood Ul Hassan R/O Laban Bandi Tehsil and District Haripur, the Appellant do hereby on oath Affirm and Declare that the contents of this Service Appeal are True and Correct to the best of my knowledge and belief and nothing has been kept concealed.

Saima Mehmood

DEPONENT



20-12-22

66

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2022

Mst. Saima Mehmood VERSUS Secretary E & SE KPK, Peshawar & Others

ADDRESSES OF PARTIES

Appellant

Mst. Saima Mehmood D/O Qazi Mehmood Ul Hassan R/O Laban Bandi Tehsil and District Haripur

Respondents

1. Secretary Elementary & Secondary Education (E & SE) Khyber Pakhtunkhwa, Peshawar
2. Director Elementary & Secondary Education (E & SE) Khyber Pakhtunkhwa, Peshawar
3. Deputy Director Elementary & Secondary Education (E & SE) Khyber Pakhtunkhwa, Peshawar
4. District Education Officer (Female) District Haripur
5. Executive District Officer Elementary & Secondary Education, Haripur.
6. The Director General Federal Directorate of Education Islamabad
7. The Director Schools (Female) Federal Directorate of Education, Islamabad.

Dated: December 19, 2022

Appellant

Through

Hajra Noreen

JAVED ALI

Muhammad Haroon

Umair Khan

Naveed Khan
Advocates High Court, Peshawar

(For use in Police Department only).

ANNEX - "A" P. NO. 00252998

Heirs, NIC NO. 122-90-026038-

- 1.
- 2.
- 3.

Verification Roll No. , dated received back

Left thumb-impression.

1. Passed S.S.C. Examination from B.I.S.E Peshawar under Roll No 181 in session 1985. Marks obtained: 518/850 & placed 3rd Division. The result was declared on 29-5-94.

Qualification	Date	Qualifications	Date
English	Passed PTC (Condensed Course) Examination under Roll No. (1293) placed 3rd Division. The result was declared on 29-5-94.	Passed (Condensed Course) Examination in First Arts. Secured 290/500 marks & placed 3rd Division. The result was declared on 7-4-93.	1993
Pashto	Passed BA Examination, 1989 (Supplementary) from the Board of Intermediate & Secondary Education Peshawar under Roll no. 6721. Secured 493 marks & placed Grade 'B'.	Other qualifications -	

2. Passed CI Examination Session, 1992 under Roll no. (752) held at G.H.S. No. 1 Hattip. Secured marks 290. The result was declared on 7-4-94.

3. Passed BA Examination, 1996 (Annual) from the University of Peshawar under Roll No. 85812. Secured marks 226/300 & placed 3rd Division. The result was declared on 31-3-1997.

Ali Badshahzay
I.D.B.O. (C)
HARIPUR

Photo Copy
of Surrica Book

A-1

18

A - 1

Entries in this page should be renewed or re-attested at least every five years and the signature in lines 9 and 10 should be dated.

1. Name .. Saima Mahmood

2. Race .. Curashi

3. Residence .. village and Po. Laban Bandi



4. Father's name and residence .. Qazi Mahmood-ul-Hassan

5. Date of birth by Christian era as nearly as can be ascertained
1-1-1970

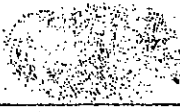
6. Exact height by measurement ..
5-1

7. Personal marks for identification..
A mole on the right side of the Neck


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 .. Saima Mahmood

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

Sub-Divisional Commissioner, Office
(Female) District Sub-Division

Date
-1993
is &
Loved
always
From
Education
483
kharaj
dar
kharaj
from
No.
ced

1	2	3	4	5	6	7	8	9
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. 171 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signature of Head of office or officer in charge

P-5
 Laban Bauli
 do
 do
 -Do-
 do
 do
 do

			750 - 31 - 1370			30/10 88	Genl. Secy S.D.E.	P. B.
			750/-			12/88	Genl. Secy S.D.E.	P. B.
			750/-			12/89	Genl. Secy S.D.E.	P. B.
			750/-			12/90	Genl. Secy S.D.E.	P. B.
	BPSR	1095	1215			6/91	Genl. Secy S.D.E.	Zch
		1095	1215			12/91	Genl. Secy S.D.E.	Zch
		1095	1215			12/92	Genl. Secy S.D.E.	Sheer S.D.E. Harif

Office of the Inspector General
 W.P. Department
 Pay Band to the Revised Pay Scale 1991
 1095
 W.P. 1-4-1991

Note
 No follow-up of payment
 made may please be
 recovered.
 @ 20% MF 1/6 to 30/9/95 B 3000/-

A/S officer

8	9	10	11	12	13		14	15
					Period	Government to which debitable		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer.	Duration of leave taken	Leave		Signatures of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
					Appointed against P.T. post at Govt Girls P. School (Labour Band) vide office of the S.D.E.O. (F) Haripur order No 1195-1127			
					Attested			
					S.D.E.O. (F) Haripur			
					Sub Divisional Officer (Female) Haripur			
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	30/11/88	Expiring	Signature of the head of the office or other attesting officer.					
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	30/11/89	"	Signature of the head of the office or other attesting officer.					
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	30/11/90	"	Signature of the head of the office or other attesting officer.					
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	31/5/91	B.P.S.R.	Signature of the head of the office or other attesting officer.					
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	30/11/91	Expiring	Signature of the head of the office or other attesting officer.					
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	30/11/92	"	Signature of the head of the office or other attesting officer.					
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	30/11/93	"	Signature of the head of the office or other attesting officer.					

Appointed against P.T. post at Govt Girls P. School (Labour Band) vide office of the S.D.E.O. (F) Haripur order No 1195-1127

Attested
S.D.E.O. (F)
Haripur

30-11-88
30-11-90

30-11-91
Acquisition Roll on record of this office.

30-11-92
Acquisition Roll on record of this office.

30-11-93
Acquisition Roll on record of this office.

Granted E/leave of 16-3-95 to 30 days on full pay vide this order No 1710 dt: 25-3-1995

Signature
S.D.E.O. (F)
Haripur

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8

L

1	2	3	4	5	6	7	8	9
Name of post	When appointed to the post (Date)	If officiating State (1) Sustaining appointment (2) Whether interim under Art. 113 C. S. R.	Pay in initial year	Additional pay for officiating	Other allowance under the term 'Pay'	Grade of appointment	Signature of competent authority	Signature and rank of officer in charge of posting
Laluan Bandi	11/1/54		1095/-			12/83	Saima Mahmood	Uo froz S.D. HAKI froz
- do -		BPS-7 (1480-31-2695)	1480/-			6/94	Saima Mahmood	
DTC Train Laluan Bandi		B-7 (1095-60-1995)	1095/-			5/94	Saima Mahmood	Adil S.D. HAKI
- do -		2 Adv. groups Passing of Adv. One Adv. for Pay fixed on 27/9/54	1201/- 60/- 1275/-			12/94	Saima Mahmood	
DTC GDS Laluan Bandi		BPS-7 (1480-31-2695)	1561/-			12/94	Saima Mahmood	
- do -			1723/-			6/94	Saima Mahmood	Adi da S.D. HAKI
- do -			1804/-			12/94	Saima Mahmood	Adi da S.D. HAKI
- do -			1885/-			12/94	Saima Mahmood	Adi da S.D. HAKI
- do -		Entire period due to period of exam				12/94	Saima Mahmood	Adi da S.D. HAKI
- do -		BPS-7 (1095-60-1995)				12/94	Saima Mahmood	Adi da S.D. HAKI
- do -		1095/- 2 Adv. groups	1275/-			12/94	Saima Mahmood	Adi da S.D. HAKI
- do -		R.B.P.S. (1480-31-2695)	1480/-			12/94	Saima Mahmood	Adi da S.D. HAKI
- do -		Passed on 15/5/54	1561/-			5/94	Saima Mahmood	Adi da S.D. HAKI
- do -		1 Adv. group				6/94	Saima Mahmood	Adi da S.D. HAKI
- do -		R.B.P.S. (1480-31-2695)				12/94	Saima Mahmood	Adi da S.D. HAKI
- do -			1804/-			12/94	Saima Mahmood	Adi da S.D. HAKI
- do -			1885/-			12/94	Saima Mahmood	Adi da S.D. HAKI
- do -			1480/-			12/94	Saima Mahmood	Adi da S.D. HAKI

	9	10	11	12	13	14	15	
	Signature and designation of the head of the office or other officer in attendance of whom the entry is made	Date of entry	Reason of absence (such as leave, absence, etc.)	Signature of the head of the office or other officer attending	Leave		Signature of the head of the office or other attending officer	Reference to any recorded punishment or award or prize of the Government
					Nature and duration of leave taken	Allocation of period of leave on average pay into four periods for which leave is payable by the Government		
					Particular Government to which applicable			
Mahmud	Y. G. Singh S.D.E.O. (P) HARIDWAR	31/5/94	Scale revised	Y. G. Singh S.D.E.O. (P) HARIDWAR				Service verified up to 30/11/95 from the Reg. Roll of the office record kept in this office.
Mahmud	Ali Da Shalwag S.D.E.O. (P) H.P.	31/5/94	Scale revised	Ali Da Shalwag S.D.E.O. (P) H.P.				Ali Da Shalwag S.D.E.O. (P) H.P.
Mahmud	Ali Da Shalwag S.D.E.O. (P) H.P.	31/5/94	Scale revised	Ali Da Shalwag S.D.E.O. (P) H.P.				
Mahmud	Ali Da Shalwag S.D.E.O. (P) H.P.	30/5/94	Annual leave	Ali Da Shalwag S.D.E.O. (P) H.P.				
Mahmud	Ali Da Shalwag S.D.E.O. (P) H.P.	30/5/95	Annual leave	Ali Da Shalwag S.D.E.O. (P) H.P.				
Mahmud	Ali Da Shalwag S.D.E.O. (P) H.P.	8/4/93	Annual leave	Ali Da Shalwag S.D.E.O. (P) H.P.				
	S.D.E.O. (P)	30/7/93	Annual leave	S.D.E.O. (P)				
	S.D.E.O. (P)	29/7/94	Annual leave	S.D.E.O. (P)				
	S.D.E.O. (P)	31/7/94	Annual leave	S.D.E.O. (P)				
	S.D.E.O. (P)	30/7/94	Annual leave	S.D.E.O. (P)				
	S.D.E.O. (P)	30/7/95	Annual leave	S.D.E.O. (P)				

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 Act. 3VI C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government Servant

Revised Entries due to passed P.P.C. Exam.

DTC Bandi
98PS, Laban Bandi Off. Temp.

BPS No. 7 (1095-60-1995)

2-Adv. Inces: FA 1095/120/1

—	—		1215/-			4/793	Saima Mahmood
---	---	--	--------	--	--	-------	---------------

—	—		1275/-			18/93	Saima Mahmood
---	---	--	--------	--	--	-------	---------------

—	—	1-Adv. Inces: FA 1339/-	1339/-			29/94	Saima Mahmood
---	---	-------------------------	--------	--	--	-------	---------------

R.B.P.S-7 (1095-60-2695)

—	—		1804/-			6/94	Saima Mahmood
---	---	--	--------	--	--	------	---------------

—	—		85/-			12/94	Saima Mahmood
---	---	--	------	--	--	-------	---------------

—	—		19			12/95	Saima Mahmood
---	---	--	----	--	--	-------	---------------

VTL 46PS
Laban Bandi Off. Temp

—	—		2047/-			12/1996	Saima Mahmood
---	---	--	--------	--	--	---------	---------------

—	—					3/1997	Saima Mahmood
---	---	--	--	--	--	--------	---------------

—	—					12/97	Saima Mahmood
---	---	--	--	--	--	-------	---------------

—	—					12/98	Saima Mahmood
---	---	--	--	--	--	-------	---------------

—	—					12/99	Saima Mahmood
---	---	--	--	--	--	-------	---------------

2614/-
B-7 (2200-120-5820)

—	—					12/2000	Saima Mahmood
---	---	--	--	--	--	---------	---------------

—	—					12/2001	Saima Mahmood
---	---	--	--	--	--	---------	---------------

Signature of Government Servant

Ali SDEC CP

Ali SDEC CP

Ali SDEC CP

Ali SDEC CP

Ali SDEC CP

Ali SDEC CP

Ali S.D.E.O. (HARI)

Ali S.D.E.O. (HARI)

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Name of the person	Signature and designation as the holder of the office subject to retirement of retirement	Date of termination of appointment	Reason of termination (e.g., death, resignation, dismissal, etc.)	Signature of the person or the authority issuing the order	Period to which the order applies	Residence of the holder of the office or other attending officer	Reference to any other records as required by rules of the Government
			Passed by Exam. Bd. 2-4-11 P.W. & F.A.	Ali da Shalung	5 DEC 1993		12/21/96
Mahmud	Ali da Shalung S.D.E.O. (P) HRP	30/11/93	Annual Insp.	Ali da Shalung	5 DEC 1993		During absence of P.W. Insp. of 7/93 to 31/10/96 - a/c of accounts and maintenance for P.W. Insp. of 7/93 and other are advised through CT no. of 29/5/96.
Mahmud	Ali da Shalung S.D.E.O. (P) HRP	29/5/94	Passed CT Ex. Insp.	Ali da Shalung	5 DEC 1993		
Mahmud	Ali da Shalung S.D.E.O. (P) HRP	31/5/94	Scale Revised	Ali da Shalung	5 DEC 1993		
Mahmud	Ali da Shalung S.D.E.O. (P) HRP	30/11/94	Annual Insp.	Ali da Shalung	5 DEC 1993		A = 8332
Mahmud	Ali da Shalung S.D.E.O. (P) HRP	30/11/95	Annual Insp.	Ali da Shalung	5 DEC 1993		11/11
Mahmud	Ali da Shalung S.D.E.O. (P) HRP	30/11/96	Passed BA	Ali da Shalung	S.D.E.O. (P) HARIPUR		
Mahmud	Ali da Shalung S.D.E.O. (P) HARIPUR	30/11/97	Examined & found fit for A.N. held allowed.	Ali da Shalung	S.D.E.O. (P) HARIPUR		Services Verified from Acq. Roll & other record of office.
Mahmud	Ali da Shalung S.D.E.O. (P) HARIPUR	30-11-97	Approved	Shahut	S.D.E.O. (P) HARIPUR		12/3
Mahmud	Shahut S.D.E.O. (P) HARIPUR	30/11/98	Approved	Shahut	S.D.E.O. (P) HARIPUR		12/99
Mahmud	Shahut S.D.E.O. (P) HARIPUR	30/11/99	Approved	Shahut	S.D.E.O. (P) HARIPUR		Shahut
Mahmud	Shahut S.D.E.O. (P) HARIPUR	30/11/2000	A/Grant	Shahut	S.D.E.O. (P) HARIPUR		
Mahmud	Shahut S.D.E.O. (P) HARIPUR	30/11/2001	A/Grant	Shahut	S.D.E.O. (P) HARIPUR		
Mahmud	Shahut S.D.E.O. (P) HARIPUR	30/11/2001	S. Recd.	Dy District Officer	Dy District Officer Haripur		
Mahmud	Shahut S.D.E.O. (P) HARIPUR	30/11/2001	A/Grant	Dy District Officer	Dy District Officer Haripur		

1	2	3	4	5	6	7	8	9
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P.T.C
 17/12/02 Lakshmi Bandi
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 — do — —

4140/- ✓
 4260/- ✓
 4380/- ✓
 BR 7 (2555-140-6755)
 5075/- ✓
 5215/- ✓

12/12/02
 12/03
 12/04
 7/05
 12/05

Signature
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 By: Dist- C Schools & I Harij
 By: Dist- Of Schools & Li Harij
 By: Dist- Of Schools & Li Harij

Through Computer
 Charge
 Area of Depreciation at
 Firm Saimi School
 RTI w/c 6/9/07
 A 28-2-09. Through
 Computer Charge Paid 100492
 July 24 27/2
 1/16

24/07/07
 (1994)
 Office of the Accountant General
 N. W. P. Division
 Pay Fixed in the contract scale 1994
 of Rs. 14820-21-2695 (7)
 at Rs. 18247/- 21-12-2001
 with next increment on 21-12-2001
 Pay Fixation Feb. 11, 1994
 W. S. Fishwar

30/01/01
 Office of the Accountant General
 N. W. P. Division
 Pay Fixed in the contract scale 2001
 of Rs. 22200-120-5820 (7)
 at Rs. 10200/- 21-12-2001
 with next increment on 21-12-2001
 Pay Fixation 21-12-2001
 W. S. Fishwar

17	18	19	20	21	22	23
Signature and designation of the head of the office or an attending officer in execution of paragraph 3 to 5	Date of cancellation of account sheet	Details of transactions (such as transfers, interest, etc.)	Signature of the head of the office or other attending officer	<p>Leave</p> <p>Allowance of period of leave on account of pay upto four months for which leave salary is payable Government</p> <p>Period Government to which applicable</p>	Signature of the head of the office or other attending officer	Reference to any records maintained or copies or record or price of the Government records.
<p><i>[Signature]</i> By: Distt. Officer (F) Primary Schools & Literacy Haripur</p>	<p>30/11/03</p>	<p>A/Prin</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>		<p>Service verified w.e.f. 1-12-00 to 30/11/03 from the acquittances rolls and other office records.</p>	<p>1-12-00 By: Distt. Officer (F) Primary Haripur</p>
<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>	<p>30/11/04</p>	<p>A/Prin</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>		<p>Service verified w.e.f. 1-12-02 to 30-11-03 from the acquittances rolls and other record of this Office</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Primary Haripur</p>
<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>	<p>30/11/05</p>	<p>A/Prin</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>		<p>Service verified w.e.f. 1-12-02 to 30-11-05 from the acquittances rolls and the other record.</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>
<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>	<p>30/11/06</p>	<p>A/Prin</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>		<p>Service verified w.e.f. 1-12-02 to 30-11-06 from the acquittances rolls and other record of this C</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>
<p><i>[Handwritten Note]</i> Arrang & deputation allowance to Mr. Sajina Mahmood w.e.f. 6-08-07 to 28-2-09 through Computer Change for the month of 06/09 120492</p>				<p><i>[Signature]</i></p>	<p>Proceeded on Elleave 24-9-2006 to 25-9-22 days on full 26-9-2006 to 04-10-09 days Elleave with out pay.</p>	<p><i>[Signature]</i> By: Distt. Officer (F) Schools & Literacy Haripur</p>

Name of post	Whether detention level or officiating and whether permanent or temporary	In officiating posts if appointed as temporary, whether service credit for pension under Act XVI of 1949	Pay scale	Grade pay	Special pay	Dearness allowance	Date of implementation	Remarks
BPS-7 (2555-140-6755)								
PTC - Post								
SSPs - Kotla	Sub/off.	-	5355/-	-	-	-	1/12/2006	
Pay scales revised w.e.f. 01-07-2007 vide Finance Division Regular								
BPS-7 (2940-160-7740)								
PTC - Post								
SSPs - Kotla	-Do-	-	6140/-	-	-	-	1/7/2007	Saima Mahood
MTT - BPS-07	-Do-	-	6300/-	-	-	-	01/12/2007	Saima Mahood
REVISED BPS-NO. 07 (Rs. 5530-190-9230)								
-Do-	-Do-	-	7520/-	-	-	-	01/07/2008	Saima Mahood
-Do-	-Do-	-	7710/-	-	-	-	01/12/2008	Saima Mahood
-Do-	-	-	Rs. 7900/-	-	-	-	01/12/09	

Signified head of the office of co
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 10/12/07

9	10	11	12	13	14	15		
				Leave				
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Period	Government to which debitable		
<p>By: Distt. Officer (F) Schools & Literacy Haripur</p> <p>Wing No. F.1(C1)/hmp/2007 dated 13-07-2007.</p>	<p>30/6/2007</p> <p>Revision of Post</p>	<p>Reason of termination</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p> <p>Service verified w.e.f. 1-12-2006 to 3-9-2006 from the acquittal rolls and the other record.</p> <p>By: Distt. Officer (F) Schools & Literacy Haripur</p>		
<p>By: Distt. Officer (F) Schools & Literacy Haripur</p> <p>D.D.O</p> <p>F.G. Girls Secondary School Pind Bagwai (F.A) Islamabad</p>	<p>9/6/2007</p> <p>Deputation to Islamabad</p>	<p>Reason of termination</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p> <p>Service verified w.e.f. 5-10-2006 to 30-11-06 from the acquittal rolls and the other record.</p> <p>By: Distt. Officer (F) Schools & Literacy Haripur</p>		
<p>By: Distt. Officer (F) Schools & Literacy Haripur</p> <p>D.D.O</p> <p>F.G. Girls Secondary School Pind Bagwai (F.A) Islamabad</p>	<p>07/07/2007</p> <p>Appointed as deputationist post.</p>	<p>Reason of termination</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p> <p>on M.T.T BPS-07 w.e.f. 06/09/07 vide FDE letter No. F.4-9/2007(W) FDE dated 01-10-2007 and joined in this school on 06-09-2007 (Pove Noon).</p> <p>By: Distt. Officer (F) Schools & Literacy Haripur</p>		
<p>By: Distt. Officer (F) Schools & Literacy Haripur</p> <p>D.D.O</p> <p>F.G. Girls Secondary School Pind Bagwai (F.A) Islamabad</p>	<p>30/06/2008</p> <p>Revised BPS No. 07 w.e.f. 01-07-08 (Rs. 3530-190-9230) wide Finance Division Regulation wing No. 1 (C1) dated 30-06-2008.</p>	<p>Reason of termination</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p> <p>Service verified w.e.f. 06-09-2007 to 31-12-07 from school record.</p> <p>By: Distt. Officer (F) Schools & Literacy Haripur</p>		

B-14

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. 37(1) C. B. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emoluments falling under the term 'Pay'	7 Date of appointment	8 Signature of Government servant
		B-7(750-31-1370)					
		pay on 30.10.1985	750/-				
		" 01.12.1985	750/-				
		pay on 1.12.1987	781/-				
		P.A. 2(A)		843/-			
		pay on 01.12.1990	874/-				
		B-7(1095-50-1425)					
		pay on 1.8.91	1335/-				
		" 1.12.91	1395/-				
		" 1.12.92	1455/-				
		" 1.12.93	1515/-				
		ONE. Inad. Paying of Exam: 27.5.94	1575/-				
		B-7(1480-31-2675)					
		pay on 1.5.94	2128/-				
		" 1.12.94	2209/-				
		" 1.12.95	2290/-				
		" 1.12.96	2371/-				
		B.A. Exam: 3. (A) 31.03.97	2614/-				
		01.12.98	2724/-				
		01.12.99	2860/-				
		01.12.2000	2865/-				
		01.12.2001	2963/-				
		B-7(2220-120-5820)					
		pay on 1.12.2001	4500/-				
		" 1.12.2002	4620/-				
		" 1.12.2003	4740/-				
		" 1.12.2004	4860/-				
		B-7(2555-140-6755)					
		pay on 1.7.2005	5635/-				
		" 1.01.2005	5775/-				
		" 1.01.2006	5915/-				
		B-7(2940-160-7740)					
		pay on 1.7.2007	6780/-				
		B-12(3630-260-11430)					
		pay on 01.10.2007	7010/-				

Unit collector
Signature
 Dy. Commr. P. S. ...
 ...

ONE. Inad.

B.A. Exam: 3. (A)

M.O. B-8

M.O. B-9

Signature
 Dy. Commr. P. S. ...

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8				Leaves Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer Reference to any recorded punishment or censure, or reward or praise of the Government servant.	
Date of termination of appointment				Nature and duration of leave taken		Period	
Reason of termination (such as promotion, transfer, dismissal, etc).				Signature of the head of the office or other attesting officer		Government to which debitable	
						<p>Service verified up to 4-8-2007 from the Acq. rolls and the record.</p> <p>By: Distt. Officer Schools & Literacy Haripur</p> <p>Service verified up to 6-9-2007 from the Acq. rolls and the record kept in this office.</p> <p>By: Distt. Officer Schools & Literacy Haripur</p> <p>C 107 4/1/07</p> <p>Distt. Officer up to 11/8/2007 C/8/07</p> <p>32116 Senior Distt. Accountant Haripur</p> <p>7/4</p> <p>Granted Medical leave w.e.f. 25/10/2007 to 27/10/2007 (03 days), Pay vide letter NO-F-4-9/2007(W) FD dated 12th April 2008.</p> <p>N. Zahid D.D.O F.G. Girls Secondary School Pind Beggani, Islamabad</p>	

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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 "Pay"	Date of appointment	Signature of Government servant

(B-12) Up-graded from BPS-07 To BPS-NO-12 w.e.f. 01-10-07.
B-12 (Rs. 3630-260-11430)

Pay revised w.e.f. 01-10-2007 as under.

(MTT B-07) Pay on 01/07/2007 6140/- 01/07/2007 Saima Mahmood

MTT B-12) Pay fixed on 01/10/2007 (6490/-) 6230 01/10/2007 Saima Mahmood

(MTT B-12) (6490/-) 6230 01/12/2007 Saima Mahmood
 Revised BPS 12 w.e.f. 01/12/2007 Rs. 4355-310-13655

MTT B-12) (7765/-) 7455 01/07/2008 Saima Mahmood

(MTT B-12) (8075/-) 7765 01/12/2008 Saima Mahmood

ACAR
 Islamabad
 7455/-
 BPS-12
 4355-310-13655
 2008
 Saima Mahmood
 Accounts Officer

(Provisional Pay + Allowance) 10/10/07
 to 30/11/2009
 B. Pay - 2500
 HRA - 10437/-
 CA - 6693/-
 DA - 99/-
 A. Relat - 55/-
 10/10/10
 8075/-
 10/10/2009

MTT B-12 Permanent

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9	10	11	12	13	14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, discharge, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	Period to which Government is debit to		

AGPR Islamabad
 Pay checked and verified Rs. 6140/- p.m on 1-10-2007 in BPS 7
 of Rs. 2960-160-774 with next increment on 1-12-2007
 Reslt. Audit. General Accounts Officer

Errors/omissions (if any) will be rectified whenever

Yasmeen Bibi

Yasmeen Bibi

D.D.O
FG. Girls Secondary School Pind Begwal (FA) Islamabad

Yasmeen Bibi

Yasmeen Bibi

Yasmeen Bibi

D.D.O
FG. Girls Secondary School Pind Begwal (FA) Islamabad

Yasmeen Bibi

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FG. Girls Secondary School Pind Begwal (FA) Islamabad

Yasmeen Bibi

Yasmeen Bibi

Yasmeen Bibi

D.D.O
FG. Girls Secondary School Pind Begwal (FA) Islamabad

Yasmeen Bibi

D.D.O
FG. Girls Secondary School Pind Begwal (FA) Islamabad

Granted Seven days leave on Medical Ground on full pay w.e.f. 26-05/2008 to 01-06-2008 vide letter No. F-4-09/2007-Dep(W) F dated 26/03/2009.

up-graded N-21 to B-12
D.D.O
FG. Girls Secondary School Pind Begwal (FA) Islamabad

Granted 15 days medical leave on full pay w.e.f. 21/05/2009 to 04/06, vide order No. F-4-09/2007-Dep L FDE dated 29/06/2009.

Yasmeen Bibi
Principal DDO
FG. Girls Secondary School Pind Begwal (FA) Islamabad

Up-graded w.e.f. 01-10-2007 to BPS-07 to BPS-12 (Rs. 3630-260) vide office order of the Executive District Officer Elementary & Sec. Education, HARIPUR No. 7108 of 19/05/2009 in the light of Govt. NWFP Finance Department vide Notification No. FD/SC(ER)10-20 dated 26-01-2008 (copy attached) w.e.f. 01-10-2007 to primary 56 Teachers who have 10 years serv

Yasmeen Bibi
YASMEEN BIBI
PRINCIPAL / D.D.O
FG. Girls Secondary School Pind Begwal (FA) Islamabad

1	2	3	4	5	6	7	8	9
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	Old or emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Number of office
TT BS-12	Permanent	BPS-12 (7000-5000-2.200)	8385/-			01/12/2010	Saima Mahmood	
			13500/-			7/2011	Saima Mahmood	
			14000/-			12/2011	Saima Mahmood	
			14500/-			12/2012	Saima Mahmood	
			15000/-			12/2013	Saima Mahmood	


10	11	12	13		14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
<i>ahmad</i>	<p><i>Tasmeen Bibi</i> TASMEEN BIBI PRINCIPAL / D.D.O G.G. Girls Secondary School Pind Begwal (F) Islamabad.</p>						
<i>ahmad</i>	<p><i>Sajida Parveen</i> SAJIDA PARVEEN D.D.O / Principal Islamabad Model School For Girls (IX) Pind Begwal Islamabad. ID:7097</p>				<p><i>Sajida Parveen</i> SAJIDA PARVEEN D.D.O / Principal Islamabad Model School For Girls (IX) Pind Begwal Islamabad. ID:7097</p>		
<i>ahmad</i>	<p><i>Sajida Parveen</i> SAJIDA PARVEEN D.D.O / Principal Islamabad Model School, For Girls (IX) Pind Begwal Islamabad. ID:7097</p>						
<i>ahmad</i>	<p><i>Sajida Parveen</i> SAJIDA PARVEEN D.D.O / Principal Islamabad Model School, For Girls (IX) Pind Begwal Islamabad. ID:7097</p>						
<i>ahmad</i>	<p><i>Mrs. Naseem Akhtar</i> MRS. NASEEM AKHTAR D D O Islamabad Model College For Girls Pind Begwal (F/A) Islamabad.</p>						

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (a) substantive appointment, or (b) whether service counts for pension under Art. 49, C. S. R.	Pay in substantive post	Additional Pay for officiating	Other allowances under the 'Pay'	Retard	Gratuity	Signature of head of office of colt
Entries Revised due to Allowed								
	untrained	Intk	we	D-0	-	A/p/H		
		BPS 07	(750 -	31 -	1370)			
	Pay m	30 - 10 -	1988	RS =	750/-			
		01 - 12 -	1988	RS =	750/-			
		01 - 12 -	1988	RS =	781/-			
		01 - 12 -	1990	RS =	814/-			
		BPS 07	(1085 -	60 -	1995)			
	Pay m	01 - 06 -	1991	RS =	1275/-			
		01 - 12 -	1991	RS =	1335/-			
		01 - 12 -	1992	RS =	1395/-			
	Allowed	02 Adv	gts	FA	on	Passing		
	PTC Exam	we	07 - 04 -	1993				
	Pay m	07 - 04 -	1993	RS =	1515/-	2 Adv		
		01 - 12 -	1993	RS =	1575/-	FA		
	Allowed	one Adv	gts	C - T	we	29/5/94		
	Pay m	29 - 05 -	1994	RS =	1635/-			
		BPS 07	(1480 -	81 -	2695)			
	Pay m	01 - 06 -	1994	RS =	2209/-			
		01 - 12 -	1994	RS =	2290/-			
		01 - 12 -	1995	RS =	2371/-			
		01 - 12 -	1996	RS =	2452/-			
	Allowed	03 Adv	gts	B - A	we	31/3/1997		
	Pay m	31 - 03 -	1997	RS =	2695/-	3 Adv		
		01 - 12 -	1997	RS =	2695/-	B - A		

↓
SDEO (F)

9	10	11	12	18		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		


 SDEO (F)
 HALIDUR



 SDEO (F)
 HALIDUR

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating stat. (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 "Pay"	Date of appointment	Signature of Government Servant
	M/over	BPS 07 To BPS 08				12/98	
		BPS 08 (1540 - 88 - 2860)					
	Pay m	01-12-1998		Rs = 2772/-			✓
		01-12-1999		Rs = 2860/-			
	M/over	BPS 09 (w.e.f 12/2000)					
		BPS 09 (1605 - 97 - 3060)					
	Pay m	01-12-2000		Rs = 2866/-			✓
		01-12-2001		Rs = 2963/-			
		BPS 07 (2220 - 20 - 5820)					
	Pay m	01-12-2001		Rs = 4500/-			
		01-12-2002		Rs = 4620/-			
		01-12-2003		Rs = 4740/-			
		01-12-2004		Rs = 4860/-			
		BPS 07 (2555 - 140 - 6755)					
	Pay m	01-07-2005		Rs = 5635/-			✓
		01-12-2005		Rs = 5775/-			
		01-12-2006		Rs = 5915/-			
		BPS 07 (2940 - 160 - 7740)					
	Pay m	01-07-2007		Rs = 6780/-			✓

SD (OCF)
 OCF (F)
 J. P. P.

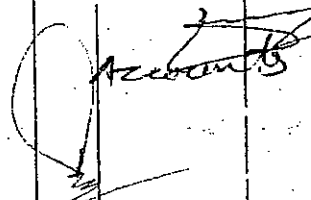
18-A-A-9

of it	9	10	11	12	13		14	15	
	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or reward or praise of the Government Servant.
						Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Period to which Government is debitable		
						<p>Allowed Annual GAC untrained Period from 1 D.O. App't vide F/dep NWFP Notification No FD(PRC) S-2/2002 Dated 30/3/2009.</p>			


 SDEO (F)
 SDEO (F)
 Haripur.

A.O.

The pay of the official may be got verified from previous audit office w.e.f 30-10-88 To 1-7-2007


 Accounts Officer
 19/6/14

1.	2.	3.	4.	5.	6.	7.	8.
Name of Post	Whether substantive officiating any whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) Volume II	Pay in substantive post	Additional pay for Officiating	Other emoluments falling under the term pay.	Date of appointment	Signature of Government servant
	عارضی مستقل کا نام مقام	اگر عارضی ہے تو رول کے مطابق پینشن کا آحق ہے؟	تعمیراتی ملازمت	زائد تنخواہ بطور قائم مقام	میسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
			Rs. Ps.	Rs. Ps.			
		BPS-07 (2940-160-7740)					
MTT BPS-07			6,780/-			06/9/2007	Saima Mahmood
		Up-graded BPS-12 (3630-280-11430)					
MTT BPS-12			7,010/-			01/10/2007	Saima Mahmood
-Do-			7,010/-			01/12/2007	Saima Mahmood
		BPS-12 (4355-310-13655)					
MTT BPS-12			8,385/-			01/01/2008	Saima Mahmood
-Do-			8,695/-			01/12/2008	Saima Mahmood
-Do-			9,005/-			01/12/2009	Saima Mahmood
-Do-			9,315/-			01/12/2010	Saima Mahmood
		BPS-12 (7000-500-22000)					
-Do-			15,000/-			01/07/2011	Saima Mahmood
-Do-			15,500/-			01/12/2011	Saima Mahmood
-Do-			16,000/-			01/12/2012	Saima Mahmood
-Do-			16,500/-			01/12/2013	Saima Mahmood

ANNEX - "B"

32

GOVERNMENT OF NWFP
SCHOOL & LITERACY DEPARTMENT.

ORDER.

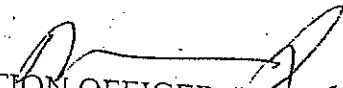
NO. SO(PE)5-2/118/05/Saima Mehmood PTC. In pursuance of the Establishment Department Government of NWFP NOC contained in letter No. SORI. (E&AD) 1-14/82 (Vol-XI) dated 25-8-2007, the services of Ms. Saima Mehmood PTC Govt. Girls Primary School Laban Bandi Tehsil & District Haripur. (NWFP) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad on deputation basis for initial period of 03 years; on the terms & conditions contained in their letter No. F.4-9/2007/ (W) FDE dated 26-07-2007.

SECRETARY TO GOVT. OF NWFP
SCHOOL & LITERACY DEPARTMENT.

Endst. No. SO (PE)5-2//118/Saima Mehmood PTC Dated Pesh: the,03-09-07.

Copy forwarded to:-

1. The Secretary to Govt. of NWFP Establishment Department w/r to his letter quoted above.
2. The Director General Federal Directorate of Education Islamabad w/r to his letter quoted above.
3. The Director School & Literacy NWFP Peshawar w/r to his endst. letter No.8282/ dated 6-12-2005.
4. The Distt: Accounts Officer Haripur.
5. The Executive District Officer School & Literacy Haripur with the request to relieve and direct the teacher concerned to report to the Director General Federal Directorate of Education Islamabad for further posting.
6. Ms. Saima Mehmood PTC GGPS Laban Bandi Haripur.


SECTION OFFICER (PRIMARY)

Pasa-2

Annex - "C" 23



Office of the Executive District officer E&SE

HARIPUR

PH No. 0995-610178, 610268

CERTIFICATE

It is to certify that this office has no objection of extension in deputation period in respect of Mrs: Sania Mehmood MTT F.G Girls Section School Pind Bajwal Islamabad is granted by the competent authority for further period.

**Executive District Officer
Elementary & Secondary Education
Haripur.**

1-2

ANNEX - D 24

No. F.2013/P.A-Dep/14-16-17/(W) FDE
Government of Pakistan
Federal Directorate of Education

Islamabad the 12th September, 2013.

To,

The Section Officer (Primary),
Elementary & Secondary Education Department,
Government of KPK,
Peshawar.

Subject:

NO OBJECTION CERTIFICATE FOR PERMANENT ABSORPTION

I am directed to refer to the subject noted above and to say that, Mrs. Saima Mehmood D.O.B 01.01.1970 D/O Qazi Mehmood ul Hassan was taken on deputation under FDE on 06.09.2007 in her own pay/grade & scale i.e. MTT (B-12).

2. Now, in the light of approval of the Prime Minister of Pakistan; the FDE is preparing the case for permanent absorption of the deputationist for onward transmission to CA&D Division for DPC/DSC. In this regard, the NOCs of parent department for permanent absorption of the deputationists are required.

3. You are requested that, the NOC / consent of your's department for permanent absorption in respect of Mrs. Saima Mehmood may be furnished to this Directorate upto 30.09.2013 for further process please. Beyond 30.09.2013 the NOC/consent will not be acceptable.

Attention: The name of above teacher will be considered for permanent absorption in the light of recruitment rule subject to approval by the Departmental Selection Committee / CA&D Division Islamabad on the condition that, completion of 05-years deputation period, meet the wedlock policy, fulfillment of codal & procedural formalities, availability of posts. If the services of above name teacher not absorbed on permanent basis by DSC / CA&DD due to lack of academic / professional qualification OR not fall in the recruitment rule OR any other deficiencies then FDE will be not bound to absorbed her services on permanent basis under FDE on the basis of this letter.

4. This letter does not confer any right or claim of permanent absorption.

5. This is issued with the approval of Director General (Edu).

Hasan
(HASAN IMRAN BAIG)
Dy. Director Schools (FEMALE)

Copy to:

- ↓ E.D.O concerned.
- ↓ D.E.O concerned.
- ↓ Person concerned.

(HASAN IMRAN BAIG)
Dy. Director Schools (FEMALE)

Hasan



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 30-09-2013

ORDER.

No.SO(PE)5-2//PT/Haripur/Saima/PST/2013. In pursuance of the Establishment & Administration Department Govt. of Khyber Pakhtunkhwa, NOC conveyed to the Elementary & Secondary Education Department vide letter No.SOR-I (E&AD)1-14/82/Vol.27 dated 24-09-2013, the services of Mrs. Saima Mehmood PST GGPS No.1 Laban Bandi Tehsil and District Haripur (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education, Islamabad **on permanent basis without retaining her lien in the E&SE Department**

SECRETARY

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary Establishment & Admn. Department Govt. of Khyber Pakhtunkhwa, w/r to his letter quoted above.
2. The Dy. Director Schools (Female) Government of Pakistan Federal Directorate of Education Islamabad w/r to his letter No.F.2013/P.A.-Dep/14-16-17(W) FDE dated 12-09-2013.
3. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. The District Education Officer(F) Elementary & Secondary Education Haripur.
5. The District Accounts Officer Haripur.
6. Mrs. Saima Mehmood PST GGPS No.1 Laban Bandi Tehsil and District Haripur.


SECTION OFFICER (PRIMARY)

Page-4

36
The Director Schools,
Federal Directorate of Education,
Islamabad.

Amre "F" 26

Subject: Request for grant of Ex-Pakistan leave without pay for the period of five years w.e.f 01.06.2014.

Respected sir,

It is submitted with profound regards that undersigned is working in your kind jurisdiction as MTT, Fe-male teacher in BPS-12 and presently posted in Islamabad Model College for Girls Pind Begwal (FA), Islamabad.

2. It is further stated that my Husband namely Mr. Tahir Ayub an official of the Ministry of Foreign Affairs has been posted to Pakistan Mission in Kyiv, Ukraine.
3. I would like to accompany my family at the place of posting of my husband. My children would also departure with us and continue their study there. There is no one who can care my family without me so my departure is mandatory.
4. It is therefore requested, that I may kindly be granted ex-Pakistan leave without pay for the period of five years w.e.f 01.06.2014 so that I could proceed with my family at the earliest please.
5. Thanks Indeed.

Saima Mahmood

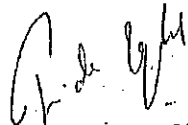
(Saima Mehmood)

MTT, Female Teacher (BPS-12),
Islamabad Model College for Girls,
Pind Begwal (FA),
Islamabad

Dated. 08.05.2014.

(relevant doc. are enclosed)

Forwarded


Principal
Islamabad Model College
For Girls Pind Begwal
(FA) Islamabad.

P-5

Annex F I 27

MOST IMMEDIATE
BY SPECIAL MESSENGER

NO.F.5-34/2014-FDE(S)
GOVERNMENT OF PAKISTAN
(CABINET SECRETARIAT)
CAPITAL ADMINISTRATION & DEVELOPMENT DIVISION

Islamabad, the July 21, 2014

From: **MAHMOOD KHAN LAKHO**
Assistant Educational Adviser
Tele:9204306

To: **The Director General (Edu),**
Federal Directorate of Education,
ISLAMABAD.

Subject: **TWO YEARS EX-PAKISTAN EXTRA ORDINARY LEAVE WITHOUT**
PAY/NOC IN RESPECT OF MST. SAIMA MEHMOOD, MTT
(DEPUATIONIST), ISLAMABAD MODEL COLLEGE FOR GIRLS,
PIND BEQWAL (FA), ISLAMABAD.

I am directed to refer to Federal Directorate of Education's U.O.No.F.1-9/141-Dep/W/FDE dated 01-07-2014 on the subject noted above and to state that the competent authority i.e Secretary, Capital A&D Division has regretted the request of Mst. Saima Mehmood, MTT (Deputationist), Islamabad Model Coolege for Girls, Pind Begwal (FA), Islamabad for granting of two years Ex-Pakistan Extra Ordinary Leave/NOC from 25.07.2014 to 24.07.2016 without pay on private affairs to proceed to Ukraine.

2. The Secretary, Capital Administration and Development Division has also remarked that "Only her parent department can sanction this leave".
3. FDE is requested to take further necessary action immediately.


(MAHMOOD KHAN LAKHO)

Copy to:-

1. The Director Schools (Female), Federal Directorate of Education, Islamabad (The P/F is enclosed herewith.
2. Mst. Saima Mehmood, MTT (Deput), Islamabad Model Coolege for Girls, Pind Begwal (FA), Islamabad.

Para-5

Annex - "9" GS



Office of the District Education Officer Female

Haripur

Ph: 0995-613244

Fax: 0995-615140

No. 3728 /

Dated: 4/8/2014

To,

The Director Schools (Female),
Federal Directorate of Education,
Islamabad.

Subject: TWO YEARS EX-PAKISTAN EXTRA ORDINARY LEAVE WITHOUT
PAY/NOC IN RESPECT OF Mst SAIMA MEHMOOD, MTT
(DEPUATIONIST), ISLAMABAD MODEL COLLEGE FOR GIRLS, PIND
BEQWAL (FA), ISLAMABAD

Memo,

With reference Assistan Educational Adviser letter No, F-5-34/2014-FDE (S) dated 21-07-2014.

Enclosed please find herewith a NOC for abroad the country (in original) in respect of Mst Saima Mehmood, PST (Deputationist), MTT Islamabad Model College for Girls Pind Begwal for further process please.

Aud
District Education Officer (Female)

Haripur

P-6

D.No 370

4/8/14

ANNEX-4-1 (29)



Office of the District Education Officer Female

H A R I P U R

Ph: 0995-613244

Fax: 0995-615140

GRANT OF LEAVE

Under the provision of leave rules 1981 Sanction is hereby accorded to the grant of leave in favour of the following Teaching staff period of leave is noted against each their name:-

S #	Name of Official / School	Period	Remarks
1.	Mst Saima Mehmood PST (Deputationist)	Ex-Pakistan Leave wef 25-07-2014 to 24-07-2016(731 days)	W/O pay

Note:-Necessary entry to this effect should be made in the service book .

Amit
District Education Officer (Female)
Haripur.

Endst No 3725-127

Dated 4-8 /2014.

Cc:

1. Director Schools(F) Federal Directorate of Education Islamabad.
2. The District Account Officer Haripur.
3. The SDEO(F) Haripur.
4. Office File

Amit
District Education Officer (Female)
Haripur

Paramb

Annex-17-2 (30)



Office of the District Education Officer Female

H A R I P U R

Ph: 0995-613244

Fax: 0995-615140

No. 3730 /

Dated: 4 / 8 / 2014

NO OBJECTION CERTIFICATE.

The undersigned has no objection to travel abroad for country in respect of Mst Saima Mahmood, PST (Deputationist) MTT, Islamabad Model College for Girls Pind Begwal (FA) Islamabad .

AW
District Education Officer

(Female) Haripur
District Education Officer
Female Haripur
(District Haripur)

Page - 6

72 H-1 (32)

REGISTERED

No.F.1-9/141-MTT (Deputationist)FDE
Government of Pakistan
Federal Directorate of Education

Islamabad, the 19th January, 2015.

OFFICE ORDER

Mrs. Saima Mehmood, Matric Trained Teacher on deputation in Islamabad Model College for Girls, Pind Begwal (FA), Islamabad is hereby repatriated to her parent department with immediate effect with the direction to report back to her Parent Department.

2. No T.A /D.A will be paid in this connection.
3. This is issued with approval of Director General (Education).

(RANA MUHAMMAD NAZIR)
DEPUTY DIRECTOR SCHOOLS (FEMALE)

Copy to:-

- AGPR, Islamabad
- Section Officer (Primary), Elementary & Secondary Education Department, Govt. of KPK, Peshawar.
- Director, Elementary & Secondary Education Department, Government of KPK, Peshawar,
- District Education Officer, (Female), Elementary & Secondary Education, Government of KPK, Haripur
- Principal concerned with the remarks to furnish her proper relieving report to this Directorate, please.
- Person concerned.
- Personal file

(ABDUL RAZZAQUE)
ASSISTANT DIRECTOR SCHOOLS (FEMALE)

8-7

44-4 35

TARİH/DATE : 29JAN16
SIRA NO : 2352173778306
SERI NO : 92495336
İSİM/NAME : İEV/TC

BU BELGE 334 NO.LU VUK G.T. UYARINCA FATURA YERİNE GECER

İADE VE BİLETE İLİSKİN İŞLEMLER İCİN, BU BELGE İLE BASVURUNUZ
FOR REFUND OR ANY OTHER TRANSACTIONS, PLEASE SUBMIT THIS DOCUMENT

YOLCU İSİMİ/PASSENGER NAME : TAHİR SAİMA MRS
BİLET NO/TICKET NUMBER : 2352173778306
REZERVASYON NO/BOOKING REF. : TZAVLF
ADRES/ADDRESS :
FİRMA İSİMİ/ COMPANY NAME :
VERGİ DAİRE/HESAP NO :
KİMLİK NO/ID NUMBER : 00
KİSİTLAMA/ENDORSMENT/RESTR. : NONEND/TK ONLY
ODEME/PAYMENT : CASH
ESAS ÜCRET/BASE FARE : 452.00USD
VERGİ/TAX : TAXES/FEES/CHARGES INCLUDED IN TOTAL FARE
TOPLAM/TOTAL : 15852UAH

FROM/TO TERMINAL CARRIER/FLIGHT C DATE DEP/ARR NVB NVA BAGGAGE STATUS
DEN/A TERMINAL TASYICI/UCUS SNF TARİH KALKIS/VARIS ÖNCE/SONRA BAG DURUM
SAATI GECERLİ DEĞİL

KBP/KİEV D TK0458 S 30JAN 1050 1300 30JAN 30JAN 40K OK
*İST/İSTANBUL I TK0710 S 30JAN 2010 0435 30JAN 30JAN 40K OK
İSB/İSLAMABAD 0

BİLET VE BAGAJ KONTROLÜ İCİN; TARİFELİ KALKIS SAATİNDEN İÇ HATLARDA 45 DK. DİŞ
HATLARDA 60 DK.ÖNCE CHECKİN İŞLEMLERİNİ TAMAMLAYINIZ
CHECKİN FORMALİTİES MUST BE COMPLETED 45 MIN. PRIOR TO SCHEDULED DEPARTURE FOR
DOMESTIC TRAVEL AND 60 MIN.FOR INTERNATIONAL TRAVEL

11

ELEKTRONIK BILET YOLCU SEYAHAT BELGESI
ELECTRONIC TICKET PASSENGER ITINERARY RECEIPT

TARİH/DATE : 29JAN16
SIRA NO : 2352173778307
SERİ NO : 92495336
İSİM/NAME : İEV/TC

BU BELGE 334 NO.LU VUK G.T. UYARINCA FATURA YERİNE GECER

İADE VE BİLETE İLİSKİN İŞLEMLER İÇİN, BU BELGE İLE BASVURUNUZ
FOR REFUND OR ANY OTHER TRANSACTIONS, PLEASE SUBMIT THIS DOCUMENT

YOLCU İSİMİ/PASSENGER NAME : TAHİR AHMED MR
BİLET NO/TICKET NUMBER : 2352173778307
RESERVASYON NO/BOOKING REF. : TZAVLF
ADRES/ADDRESS :

ŞİRKET İSİMİ/ COMPANY NAME :
ŞİRKET DAİRE/HESAP NO :
KİMLİK NO/ID.NUMBER : 00
VİZESİZLİK/ENDORSEMENT/RESTR. : NONEND/TK ONLY

ÖDEME/PAYMENT : CASH
BAZ UCRET/FARE : 452.00USD
VİZESİZLİK/FARE : TAXES/FEES/CHARGES INCLUDED IN TOTAL FARE
TOPLAM/TOTAL : 15852UAH

YERİNE/TO TERMINAL CARRIER/FLIGHT C DATE DEP/ARR NVA NVA BAGGAGE STATUS
YERİNE/A TERMINAL TASYİCİ/UCUS SNF TARİH KALKIS/VARIS ÖNCE/SONRA BAG. DURUM
SAATI GECERLİ DEĞİL

KIEV	D	TK0458	S	30JAN 1050 1300	30JAN 30JAN 40K	OK
İSTANBUL	I	TK0710	S	30JAN 2010 0435	30JAN 30JAN 40K	OK
İSLAMABAD	0					

İLETTİĞİ VE BAGAJ KONTROLÜ İÇİN; TARİFELİ KALKIŞ SAATİNDEN İÇERİ HATLARDA 45 DK. DİŞERİ
HATLARDA 60 DK. ÖNCE ÇEKİŞİ İŞLEMLERİNİ TAMAMLAYINIZ
CHECKIN FORMALITIES MUST BE COMPLETED 45 MIN. PRIOR TO SCHEDULED DEPARTURE FOR
DOMESTIC TRAVEL AND 60 MIN. FOR INTERNATIONAL TRAVEL

P-11

Dok 26 - "1"
(K)

ELEKTRONIK BILET YOLCU SEYAHAT BELGESI
ELECTRONIC TICKET PASSENGER ITINERARY RECEIPT

TARİH/DATE : 29JAN16
SIRA NO : 2352173778308
SERI NO : 92495336
ISIM/NAME : IEV/TC

BU BELGE 334 NO.LU VUK G.T. UYARINCA FATURA YERINE GECER

TAADE VE BILETE ILISKIN ISLEMLER ICIN, BU BELGE ILE BASVURUNUZ
FOR REFUND OR ANY OTHER TRANSACTIONS, PLEASE SUBMIT THIS DOCUMENT

YOLCU ISMI/PASSENGER NAME : TAHIR HASSAN MR
BILET NO/TICKET NUMBER : 2352173778308
REZERVASYON NO/BOOKING REF. : TZAVLF
ADRES/ADDRESS :

FIRMA ISMI/ COMPANY NAME :
VERGI DAIRE/HESAP NO :
KIMLIK NO/ID.NUMBER : 00
KISITLAMA/ENDORSMENT/RESTR. : NONEND/TK ONLY

ODEME/PAYMENT : CASH
ESAS UCRET/BASE FARE : 452.00USD
VERGI/TAX : TAXES/FEES/CHARGES INCLUDED IN TOTAL FARE
TOPLAM/TOTAL : 15852UAH

FROM/TO	TERMINAL	CARRIER/FLIGHT	C	DATE	DEP/ARR	NVB	NVA	BAGGAGE	STATUS
DEN/A	TERMINAL	TASIIYICI/UCUS	SNF	TARİH	SAATI	GEÇERLİ	DEĞİL	BAG	DURUM

KBP/KIEV	D	TK0458	S	30JAN	1050 1300	30JAN	30JAN	40K	OK
*IST/ISTANBUL	I	TK0710	S	30JAN	2010 0435	30JAN	30JAN	40K	OK
ISB/ISLAMABAD	0								

BILET VE BAGAJ KONTROLU ICIN; TARIFELI KALKIS SAATINDEN IC HATLARDA 45 DK. DIS
HATLARDA 60 DK.ONCE CHECKIN ISLEMLERINI TAMAMLAYINIZ
CHECKIN FORMALITIES MUST BE COMPLETED 45 MIN. PRIOR TO SCHEDULED DEPARTURE FOR
DOMESTIC TRAVEL AND 60 MIN.FOR INTERNATIONAL TRAVEL

P-11

A. ANJUM (4)



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR**
(Office Phone No. 0995-613244 Fax No. 0995-615140)

CANCELLATION


The Ex- Pakistan leave sanctioned infavour of Mst Saima Mehmood D/O Qazi Mehmod-Ul-Hassan ex PST GGPS Liban Bandi. vide No. 3725-27 dated 04-08-2014 is hereby declared as null and void as it was sanctioned without any lawful authority. Moreover, the teacher concerned has been absent since 04-08-2010.

(NaheedAnjum)
District Education Officer (Female)
Haripur

EndstNo. 9811-15/DEO (F)/Haripur/Estb; Pry/Cancellation EPL Dated; Haripur the 20-10-2015

Copy forwarded for information to the:-

1. Director E&S Education Khyber Pakhtunkhwa Peshavar.
2. Deputy Commissioner Haripur.
3. Deputy Director Schools (F), Federal Directorate of Education Islamabad.
4. SDEO (F) Haripur.
5. ASDEO (F) Circle concerned.
6. ADEO Litigation local office.
7. Mst Saima Mehmood D/O Qazi Mehmod-Ul-Hassan ex PST GGPS Liban Bandi.
8. PSHT GGPS Liban Bandi Haripur.
9. M/File.


District Education Officer (Female)
Haripur

P-8



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR

(Office Phone No. 0995-613244 Fax No. 0995-615140)

SHOW CAUSE NOTICE

ANJUM "J"
47

I, Naheed Anjum, as competent authority, under the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary) Rules, 2011, do hereby serve, Mst: Saima Mehmood PST GGPS Kotla Haripur as follows.

1. Whereas you were performing your duties as Primary School Teacher (PST) at GGPS Kotla Haripur and went on deputation to F.G Girls Secondary School Pind Begwal (FA) Islamabad on 04/08/2007 for three (03 Year)s only. Your deputation Period expired on 03-08-2010. You had not got any extension in the deputation period from the competent authority and have been absent from your duties since 04/08/2010. The Ex- Pakistan Leave sanctioned in your favour vide No. 3725-27 dated 04/08/2014 has already been declared as null and vide this office order No.9811-15 dated 20/10/2015.
2. And Whereas an Absent notice was issued vide this office No. 9818-24/DEO(F)/Haripur/Estb Pri /Discp Act dated Haripur the 21/10/2015.
- 3: And Whereas an absent notice published in Aaj Newspaper dated 27/01/2016 and You were directed to appear before competent authority within 15 days.
4. And whereas you reported to this office on dated 09-02-2016.
5. And material on record, I am satisfied that you have committed the following acts/ omissions specified in rule 3 of the said rules.
 - a) Guilty of Willful absenteeism
 - b) Guilty of Misconduct
 - c) You have ceased to be efficient
6. As a result thereof, I, as competent authority, have tentatively decided to impose upon you "One of More of the penalties" specified in rule 4 of the said rules.
7. You are, therefore, required to, show cause as to why the aforesaid penalty/penalties should not be imposed upon you and also intimate whether you desire to be heard in person.
8. If no reply to this notice is received within 07 days of its delivery, it shall be presumed that you have no defence to put in and in that case on ex-Parte action shall be taken against you.

(Naheed Anjum)
District Education Officer (Female)
Haripur
(Competent authority)

1440-44

Endst; No. ___/DEO (F) Haripur/Estab; Pri /Saima Mehmood Dated Haripur the 18/02/2016

Copy forwarded for information and n/action to the;

1. Director E & S Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Haripur.
3. Senior District Accounts Officer Haripur.
4. District Monitoring Officer E & SE Haripur.
5. Sub Divisional Education Officer (Female)
6. Master File

17/2/16

District Education Officer (Female)
Haripur

P-11

میرٹھ صاحب ڈسٹرکٹ ایجوکیشن آفیسر زمانہ مدارس ضلع میرٹھ

I - جنہیں دیکھو وہ جواب ضرور لکھو

93

خاص نام لکھو
شوکارا ڈسٹرکٹ ایجوکیشن آفیسر 44-1440 فورم 2/18 جواب
دو ذیل سے:

1۔ میرٹھ میں موجود ہے فورم 2/10 30 کو بطور پرائمری سکول معلم سرکاری اختیار
کی گورنمنٹ پرائمری سکول بسا کر اس میں تحصیل و ضلع
میرٹھ اور مہوہ تحصیلوں خواہ میں ملے تعلیمی سہولت

2۔ میرٹھ نوٹیفکیشن No. SO (PE) 5-2/118/50/2014 کو 29 کے تحت پندرہ سال
کے لڑکے اسکول ڈائریکٹر آف ایجوکیشن اسلام آباد میں deputate
پہنچائی گئی اس کے تحت لکھو

3۔ میرٹھ میں سالانہ پرائمری سکول کے تحت پندرہ سال گورنمنٹ تعلیم اور سکول
گورنمنٹ کے درمیان فیوڈرٹ ثابت گاؤں میں روزانہ مفت
No. SO (PE) 5-2/118/50/2014 کے فورم 2/9 کے تحت
میرٹھ میں موجود ہے پندرہ سال کے لڑکے اسکول ڈائریکٹر
میرٹھ کے تحت لکھو

4۔ میرٹھ میں گورنمنٹ تعلیم سال 2014 میں فورم 2/25-247
EX - Pakistan کے تحت لکھو اور اس کے تحت لکھو
No. F-5-34/2014 کے تحت لکھو اور اس کے تحت لکھو
Tareeqہ میں حاصل کر سکتے ہیں

5۔ میرٹھ میں موجود ہے فورم 2/7 کے تحت لکھو اور اس کے تحت لکھو
ایجوکیشن آفیسر کو حقیقی طور پر اسکول ڈائریکٹر کو حقیقی
مقرر کیا اور جو ڈسٹرکٹ آفیسر No. F-5-34/2014 کے تحت لکھو
247 کے تحت لکھو اور اس کے تحت لکھو

میرٹھ میں لکھو اور اس کے تحت لکھو
247 کے تحت لکھو اور اس کے تحت لکھو
میرٹھ میں لکھو اور اس کے تحت لکھو
میرٹھ میں لکھو اور اس کے تحت لکھو
Adjustment




ANNEX - "K" 57
6/6

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR
(Office Phone No. 0995-613244 Fax No. 0995-615140)

NOTIFICATION:

1. **Whereas**, Disciplinary proceedings were started against **Mst; Saima Mehmood Ex PST GGPS Kotla District Haripur** under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules-2011, on the charges of willful absenteeism.
2. **And whereas**, during the proceedings a letter came to the notice of the competent authority that was issued by the Section Officer (Primary) E&SE Department Government of Khyber Pakhtunkhwa vide No. SO(PE)5-21/IPT/Haripur/Saima/PST/2013 dated Peshawar the 30-09-2013 wherein her services were placed at the disposal of the Federal Directorate of Education Islamabad on permanent basis without retaining her Lien in the E&SE Department Khyber Pakhtunkhwa.
3. **And whereas** she kept the E&SE (F) Department Haripur in dark by concealing the facts.
4. **And whereas**, as is evident from the aforementioned letter, she has been no more an employee of this department since 01-10-2013, therefore the disciplinary proceedings started in ignorance against her are withdrawn ab initio and she is directed to resort to the Federal Directorate of Education Islamabad for any kind of relief or leave, being its permanent employee.


(Naheed Anjum) 7/4/16
District Education Officer (Female)
Haripur
(Competent authority)

Endst; No 2969 /DEO (F) Haripur/Estb;Pry /Saima Mehmood Ex PST, Dated Haripur the 07/04/2016.

Copy forwarded for information and n/action to the;

1. The Director E & S Education Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Haripur.
3. The Senior District Accounts Officer Haripur.
4. The SDEO (F) Haripur.
5. The District Monitoring Officer E & SE Haripur.
6. The ASDEO (F) Circle concerned.
7. The Primary School Head Teacher GGPS Kotla Haripur.
8. Mst Saima Mehmood Ex PST GGPS Kotla Haripur.
9. The ADEO/Suptt; Estab Primary Local Office.
10. Master File.

District Education Officer (Female)
Haripur

P-12

To

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

Annex - 2

Regd

(45)

Subject:

Departmental Representation / Appeal Against the Notification No. 2969/DO(F) Haripur /Estb.Fry/ saima Mehmood Ex PST , Dated the 07-04-2016 passed out by District Education Officer Female Haripur.

R/Sir

With due regard, it is submitted that facts of the appeal are appended below for your kind perusal and sympathetic consideration please:-

1. That the appellant joined the service in E&SE KPK as PST on 30-10-1988 at GGPS Laban Bandi Tehsil & District Haripur.
2. That vide Notification No. SO(PE) 5-2/118/Saima Mehmood Dated 03-09-2007 the service of appellant was deputed on the disposal of Federal Directorate of Islamabad for three years (copy attached).
3. That after that the service of appellant was permanently transferred to Federal Directorate of Islamabad vide Notification No. SO(PE) 5-2/118/Saima Mehmood/PST 2013 Dated 30-09-2013 (copy attached).
4. That in year 2014 the appellant applied for Ex-Pakistan Leave for the period 25-07-2014 to 24-07-2016 to Federal Directorate of Education Islamabad, but instead of sanctioned, authority directed me to approach to the parents department that is DEO(F) Haripur (copy attached).
5. That in response to directives contained in letter referred in Para no.4 above the appellant applied for leave to DEO (F) Haripur which was sanctioned vide his order No.3725 -27 dated 04-08-2014 for the period 25-07-2014 to 24-07-2016. (copy attached).
6. That during leave the service of appellant was repatriated to the parent department with immediately effect i.e from Islamabad to Haripur KPK vide Notification No. F.1-9/141-MTT(Deputations) FDE Government of Pakistan Federal Directorate of Education, passed out by Deputy Director Schools (F) Islamabad (copy attached).
7. That on other hand before expiry of my leave DEO(F) Haripur served upon the appellant a notice on 21-10-2015 in writing and also published a notice in News Paper Ajj on 27-01-2016 to resume duty within 15 days and in response, the appellant submitted arrival to DEO(F) Haripur on 09-02-2016 accordingly.

P-13

112 1- (46)

8. That DEO (F) Haripur instead of acceptance of arrival of appellant served a show cause notice on the appellant vide Endst No. 1440-44 dated 18-02-2016(copy attached).
9. That lastly on 07-04-2016 DEO(F) Haripur passed out a Notification, according to para-4 of the said notification it has been added that "And whereas , as in evident from the aforementioned letter , she has been no more an employee of this department since 01-10-2013, therefore the disciplinary proceedings stated in ignorance against her and withdrawn ab initio and she is directed to resort to the Federal Directorate of Education Islamabad for any kind of relief or leave , being its permanent employee(copy attached).
10. From the perusal of above stated facts it is crystal clear that the DEO (F) Haripur is legally bound to accept arrival of appellant from 09-02-2016. Keeping in view of 27 years services of appellant and requirement of show cause notices served upon the appellant in writing on home address and also published in News Paper with the direction to resume duty with in 15 days.

It is humbly prayed that the impugn Notification issued by DEO(F) Haripur may graciously be set aside in the interest of justice by acceptance the appeal of the appellant and she may be directed to allow the appellant to assume duty w.e.f the date of her arrival i.e 09-02-2016 by cancellation of un availed portion of leave and obliged.

Appellant

Saima Mahmood
Saima Mahmood PST 12-04-2016
GGPS Kotla Haripur
Residence of Village Laband Bandi Tehsil &
District Haripur

112 2

472

No. 1151

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is required.

Rs. Ps.
50

Received a registered* _____ Date-Stamp _____
 addressed to _____
 Initials of Receiving Officer _____
 Insured for Rs. (in figures) _____ (in words) _____
 Insurance fee Rs. _____ Ps. _____ (in words) _____
 Name and address of sender _____

if insured.

Post Office
Director

112-3-48



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
— HARIPUR**

(Office Phone No. 0995-613244 Fax No. 0995-615140)

No. 9818-24 /DEO (F)/Haripur/

Estb; Pry/Discp Act

Dated: Haripur the 21-10-2015

To

Mst. Saima Mehmood D/O Qazi Mehmud-Ul-Hassan
R/O Laban Bandi
Tehsil & Distt; Haripur

Subject: **ABSENCE NOTICE**

Memo;

Whereas, you were performing your duties as Primary School Teacher (PST) at GG Laban Bandi No.1 Haripur and went on deputation to F.G. Girls Secondary School Pind Begwal (F Islamabad on 04-08-2007 for three (03) years only. Your deputation period expired on 03-08-2010. You had not got any extension in the deputation period from the competent authority and have been absent from your duties since 04-08-2010. The Ex- Pakistan leave sanctioned in your favour vide No. 3725-dated 04-08-2014 has already been declared as null and void vide this office order No. 9811-15 dated 10-2015

You are, therefore, directed to report to this office within 15 days of the issuance of this notice. If you failed to do so within the stipulated time, an ex-parte action shall be taken against you under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011.

(Naheed Anjum)
District Education Officer (Female)
Haripur
Competent Authority

Endst: - Of Even No and Date.

Copy forwarded for information to the:-

1. Director E&S Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Haripur.
3. Deputy Director Schools (F), Federal Directorate of Education Islamabad.
4. SDEO (F) Haripur.
5. ASDEO (F) Circle concerned.
6. ADEO Litigation local office.
7. M File.

R-3

Received by

11/10/15
11/10/15

District Education Officer (Female)
Haripur

02-5 (80)

To

The District education Officer (F)
Haripur.

Subject:- ARRIVAL REPORT FOR RESUMPTION OF DUTY.

R/Madam:-

With due regard it is submitted that in response to absent notices served upon me vide your office No.9818-24 dated 21-10-2015 and notice published in Daily Aaj News paper dated 27-01-2016 i have come back to Pakistan from Ukraine along with two little kids and i bit to submit my arrival to resume duty w.e.f 09-02-2016.

It is, therefore, requested kindly allow me to resume duty by cancellation of unavailed portion of Ex-Pakistan Leave already sanctioned in my favour and obliged please.

You're obediently

Saima Mehmood
Saima Mehmood PST 09/02/2016
R/O village Laban Bandi Tehsil
& District Haripur

P-14

1102 B - (51)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT, ABBOTTABAD.

Appeal No. 1258/2016

Date of institution ... 01.07.2016
Date of decision ... 20.06.2019

Mst. Saima Mehmood, PST GGPS Kotla (Haripur) resident of village and Post office Laban Bandi Tehsil and District Haripur. (Appellant)

Versus

The Secretary (E&SE) Department Khyber Pakhtunkhwa Peshawar and two others. (Respondents)

Present

Mr. Sajid-ur-Rehman Khan, Advocate ... For appellant.

Mr. Muhammad Bilal, Deputy District Attorney ... For respondents.

MR. HAMID FAROOQ DURRANI, MR. AHMAD HASSAN, ... CHAIRMAN MEMBER.

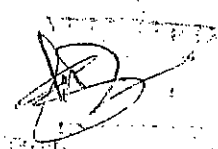
JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is essentially aggrieved of order dated 07.04.2016 issued by District Education Officer (Female) Haripur/respondent No. 3, whereby, it was notified that the appellant was no more an employee of the department since 01.10.2013 and the disciplinary proceedings started against her were by ignorance. The same were withdrawn ab-initio and the appellant was directed to resort to the Federal Directorate of Education Islamabad for any kind of relief or leave, being its permanent employee.

2. We have heard learned counsel for the appellant as well as learned Deputy District Attorney on behalf of the respondents and have also gone through the available record.



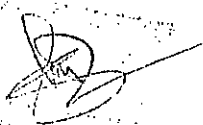


42-7 (52)

3. The record suggests that the appellant was appointed as PST in District Haripur on 30.10.1988. On 03.09.2007, the service of appellant was placed, on deputation, at the disposal of Federal Directorate of Education Islamabad for initial period of three years. Upon expiry of the said period the appellant applied for further extension of her deputation where-against a No Objection Certificate was issued by the Executive District Officer, Elementary & Secondary Education, Haripur. On 12.09.2013, the Deputy Director Schools (Female) Federal Directorate of Education sent a letter to the Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar requiring the issuance of No Objection Certificate for permanent absorption of the appellant. The cutoff date noted therein was 30.09.2013. Consequently on 30.09.2013, the Secretary Elementary & Secondary Education Department issued the requisite N.O.C with the condition that the service of appellant was placed at the disposal of Federal Directorate of Education, Islamabad on permanent basis without retaining her lien in the E&SE Department.

On 08.05.2014, the appellant applied to Federal Directorate of Education for grant of Ex-Pakistan leave without pay for a period of five years w.e.f. 01.06.2014. In response to said application it was remarked that only the parent department of appellant could sanction the leave. The requisite leave was applied by the appellant in order to join her husband who was posted to Pakistan Mission in Ukraine. The record also shows that on 04.08.2014 the appellant was granted leave without pay for 731 days by the District Education Officer (Female) Haripur who was also pleased to issue

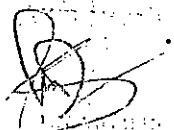




3
19-2-8 - (53) (15)

the requisite N.O.C on the even date. The appellant left for abroad after obtaining leave and N.O.C, when on 19.01.2015, an office order was issued by the Federal Directorate of Education regarding repatriation of appellant to her parent department with immediate effect. On 20.10.2015 the respondent No. 3 issued cancellation order, wherein, it was provided that the ex-Pakistan leave sanction in favour of appellant was declared as null and void as it was sanctioned without any lawful authority. She was considered absent since 04.08.2010. The cancellation was followed by an absence notice dated 21.10.2015, wherein, the appellant was required to report to the office of respondent No. 3 within 15 days, else proceedings against her would be taken under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. The absence notice was followed by a publication in the Newspaper. The appellant, on 09.02.2016, submitted her arrival after return from Ukraine with the request for cancellation of un-availed portion of her leave. On 18.02.2016, the appellant was issued show cause notice by respondent No. 3, wherein, major penalty was proposed against her on account of wilful absence, misconduct and inefficiency. The notice was replied to by the appellant on 19.02.2016. Consequently, the impugned notification was issued on 07.04.2016.

4. We have considered the arguments of learned counsel for the parties and the record before this Tribunal which reflect that the appellant was duly issued sanction for her initial deputation to the Directorate of Education, Islamabad. The period of deputation was duly extended and the requisite No Objection Certificate, for permanent absorption of the appellant in the Federal Government, was also allowed. The record is, however, silent



6

UL-9 (54) (11)

regarding the incidence of permanent absorption of the appellant by Federal Government. On the other hand, for travelling of the appellant abroad and her stay outside Pakistan the respondents issued the requisite N.O.C and leave sanction, therefore, the allegation contained in the impugned notification to the effect that the appellant kept the Elementary & Secondary Education (Female) Department, Haripur in dark by concealing the fact that she was not permanently absorbed by the Federal Government, is not correct. It was on 08.05.2014, much after the expiry of her initial period of deputation, that the respondents allowed the appellant requisite leave as well as No Objection Certificate. In the circumstances, it remains beyond perception that the appellant concealed the fact of her non-absorption by the Federal Government from respondents. It is also a fact that during the currency of her ex-Pakistan leave the cancellation order dated 20.10.2015 was issued. Interestingly, the appellant was shown therein to have been absent since 04.08.2010. Had there been any illegality in issuance of N.O.C and leave sanction to the appellant by the respondents, the former was not supposed to suffer. Despite the fore-noted erratic conduct of the respondents the departmental appeal preferred by the appellant was not responded to by the competent appellate authority.

5. In the circumstances, we consider that it would be in the interest of justice to remit the case back to the respondent No. 2 for decision of departmental appeal/ representation of appellant in accordance with the relevant law/rules after thorough scrutiny of the record. The requisite decision shall be made within a period of sixty days from the

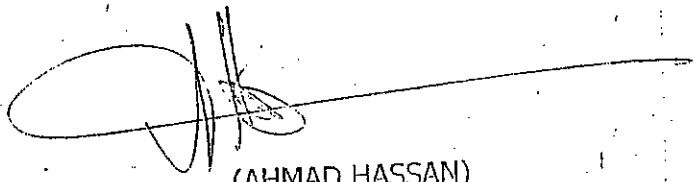


120-70 (55)

receipt of copy of instant judgment. The appellant may also be provided opportunity of personal hearing and setting-forth her defence.

Order accordingly.

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

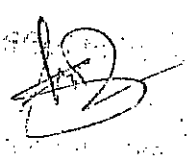


(AHMAD HASSAN)
Member



(HAMID FAROOQ DURRANI)
Chairman
Camp Court, Abbottabad.

ANNOUNCED
20.06.2019



22000
22000
4100
26000

05/07/2021

05/07/2021
05/07/2021

11-11-56

accepted by allowing all back benefits of service including salary from the date of arrival to onward in the interest of justice.

It is further prayed that the instant Service appeal may graciously be accepted with cost please.

Saima Mahmood

Appellant

Through Counsel

Ym. A. a

Sajid-ur-Rehman Khan
Advocate Haripur Bar

Dated 28/06/2016.

05/07/2016

2400
26.00
4.00
30.00

05/07/2016
10/10/15

02.12.16 57

BEFOR THE KHYBER PAKHTUN KHAWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1258 /2016

Mst. Saima Mehmood, PST GGPS Kotla(Haripur) resident of village & P/O Laban Bandi
Tehsil & District Haripur

(Appellant)

VERSUS

1. The Secretary (E & SE) Department, K.P.K Peshawar.
2. The Director of (E & SE) Department, K.P.K Peshawar.
3. The District Education Officer (F) District Haripur.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 687

Date 01-7-2016

(Respondents)

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 READ WITH
SECTION 19(2) OF CIVIL SERVANTS E&D RULES,2011.

PRAY:-

ON ACCEPTANCE OF THE INSTANT APPEAL IT IS HUMBLY PRAYED
THAT NECESSARY DIRECTIONS MAY GRACIOUSLY BE PASSED OUT TO
THE RESPONDENTS TO SET-ASIDE THE IMPUGNED NOTIFICATION DATED
07-04-2016 & LETTER NO.9811-15 DATED 20-10-2016 REGARDING
CANCELLATION OF LEAVE OF APPELLANT ALREADY SANCTIONED.
MOREOVER ARRIVAL REPORT OF APPELLANT SUBMITTED TO DEO (F)
HARIPUR W.E.F 09-02-2016 REGARDING RESUMPTION OF DUTY BE
ACCEPTED BY ALLOWING ALL BACK BENEFITS OF SERVICE INCLUDING
SALARY FROM THE DATE OF ARRIVAL TO ONWARD OR ANY OTHER
RELIEF WHICH THIS HONORABLE SERVICE TRIBUNAL DEEM FIT IN THE
INTEREST OF JUSTICE.

Respectfully Sheweth:-

It is submitted that the brief facts/grounds giving arise to the constitution of
this appeal are as appended below:-

FACTS:-

- 1- That the appellant joined the service in Elementary & Secondary Education Khyber
Pakhtunkhwa as PST at GGPS Laban Bandi Tehsil & District Haripur on 30-10-

1988. (Photo Copy of S. Book is annexed as Annexure-A)

[Signature]
SECRETARY

1/7/16.

[Signature]

- "L" 13 (58)
- 2- That vide Notification No.SO(PE)5-2/118/Saima Mehmood Dated 03-09-2007 issued by Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department the service of appellant was deputed on the disposal of Federal Directorate of Education Islamabad for initial period of 3 years (Copies annexed as Annexure-B).
 - 3- That on 12-09-2013 vide No. F.2013/P.A-Dep/14-16-17/(W)FDE Govt: of Pakistan Federal Directorate of Education Islamabad send a letter to Section Officer (Primary) E&SE Department Govt: of K.P.K Peshawar for obtaining consent/NOC of Provincial Govt: for placement of name of appellant before Committee for Permanent absorption. with the condition that "The name of above teacher will be considered for permanent absorption in the light of recruitment rule subject to approval by the Departmental Selection Committee/CA &D Division Islamabad on the condition that completion of 05 years deputation period, meet the wedlock policy, fulfillment of codal &procedural formalities, availability of posts. If the services of above named teacher not absorbed on permanent basis by DSC/CA&DD due to lack academic/professional qualification OR not fall in the recruitment rule OR any other deficiencies the FDE will be not bound to absorbed her services on permanent basis under FDE on the basis of this letter. 4. This letter does not confer any right or claim of permanent absorption." (Copy annexed as Annexure-C)
 - 4- After that instead of giving consent/NOC the service of appellant was placed at the disposal of Federal Directorate of Education, on permanent basis, vide Notification No. SO(PE)5-2/IPT/Haripur/Saima /PST/2013 by Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 30-09-2013. (Copy is annexed as Annexure-D)
 - 5- That in year 2014 the appellant applied for Ex- Pakistan Leave for two years to the Federal Directorate of Education, Islamabad from 25-07-2014 to 24-07-2016 without pay on private affairs to proceed to Ukraine where her husband named Tahir Ayub was/ is an employce in Pakistan Embassy in Ukraine but Federal Govt: refused request of appellant with the remarks that "Only her Parent department can sanction this leave" vide letter No.F.5-34/2014-FDE(S) dated 21-07-2014 (Photocopies are annexed as Annexure-E).
 - 6- That in compliance with the remarks endst: in the refusal letter of Federal Govt: referred in para 5 above the appellant applied to DEO (F) Haripur who is competent authority in the case of appellant for grant of leave/NOC to proceed abroad which

Federal Directorate of Education, Islamabad for any kind of relief or leave, being its permanent employee. (Copy annexed as Annexure-L).

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13- That against the Notification dated 07-04-2016 issued by DEO (F) Haripur a Departmental Representation was preferred by the appellant to worthy Director E&SE Khyber Pakhtunkhwa (Appealed Authority) on 12-04-2016. but not received respond within stipulated period of 60 days, (Copy is annexed as Annexure-M) - hence this appeal is being filed inter alia on the following grounds.

GRUNDS:-

- A. That a letter of Federal Govt: dated 12-09-2013 (referred in Para 3 of the facts) was for obtaining consent/NOC for placement of the case of the appellant before Committee of Federal Govt: to examine the eligibility for permanent absorption. subject to approval by Departmental Selection Committee CA &D Division Islamabad, but Section Officer (Pry) Govt: E&SE Department K.P.K vide letter dated 30-09-2013 (referred in Para 4 of the facts) instead of given consent/NOC in this regard, placed the service of appellant on the disposal of Federal Directorate of Education, Islamabad on permanent basis which was not the mandate of provincial Govt: of K.P.K E&SE department hence was not consider by the Federal Govt: Moreover the case of appellant was not approved by the said Committee of Federal Govt: for permanent absorption to the appellant as Federal Govt: employee of Education Department.
- B. That when DEO (F) Haripur being competent authority in case of appellant was sanctioned Ex- Pakistan Leave and also accorded NOC for proceeding abroad in favour of appellant and informed about this action to the concerned Director of Schools Female Federal Directorate of Education Islamabad vide her letter No. 3728 dated 04-08-2014 there was no reason to deny for the acceptance of arrival of appellant by DEO(F) Haripur for resumption of duty w.e.f 09-02-2016 which was given by the appellant in response to notices served upon the appellant by DEO (F) Haripur.
- C. That as referred in para-7 of the facts Federal Directorate of Education, Islamabad vide letter dated 19-01-2015 repatriated to the appellant to her parent department because by accepting directions in the letter of Federal Govt: dated 21-07-2014. competent authority of Provincial Govt: i.e DEO (F) Haripur was already accorded Ex- Pakistan Leave and NOC for proceeding abroad in favor of appellant

was accordingly allowed by DEO (F) Haripur vide No.3725-27 dated 04-08-2014 and No.3730 of even date with an information letter to Director Schools (Female) Federal Directorate of Education Islamabad. (Photocopies are annexed as Annexure-F).

- 7- That during Ex-Pakistan Leave Govt: of Pakistan Federal Directorate of Education vide Notification No.F.1-9/141-MTT(Deputationist)FDE dated 19-01-2015 the appellant was repatriated to her parent department with immediate effect with the direction to report back to her parent department. (Copy is annexed as Annexure-G).
- 8- That on 20-10-2015 DEO(F) Haripur cancelled leave granted to the appellant vide its letter No.9811-15/DEO(F)/Haripur/Est:Pry/Cancellation EPL. with the remarks that the teacher concerned is absent since 04-08-2010.(Copy is annexed as Annexure- H).
- 9- That on next day dated 21-10-2015 DEO (F) Haripur issued an absent notice to the appellant on her home address with the direction to report within 15 days otherwise Ex-part action shall be taken against her under Khyber Pakhtunkhwa E&D Rules 2011. (Copy is annexed as Annexure-I)
- 10- That on 27-01-2016 DEO (F) Haripur published a notice in Daily News paper Aaj Abbottabad with the directions to the appellant to resume duty within 15 days and also explain for reason of absent. (Copy is annexed as Annexure- J)
- 11- That in response to absent notices referred in Para 9 & 10 the appellant come back from Ukraine along with two kids after paying about Rs: 240000/- fair of aero plain one side and submitted her arrival to DEO(F) Haripur on 09-02-2016 but instead of acceptance of arrival DEO(F) Haripur served upon the appellant a show cause notice vide No.1440-44/DEO(F) Haripur/Estab:Pry/Saima Mehmood dated 18-02-2016, which was on receipt accordingly replied by the appellant. (Copies are annexed as Annexure-K)
- 12- That lastly on 07-04-2016 DEO(F) Haripur passed out a Notification according to Para-4 of the said notification concluded Para it has been added that " And whereas, as in evident from the aforementioned letter, she has been no more an employee of this department since 01-10-2013, therefore the disciplinary proceedings stated in ignorance against her and withdrawn aab initio and she is directed to report to the

considering her employee of E&SE Department K.P.K District Haripur. Hence the impugned order is illegal and unlawful and against the facts on record and liable to be set aside.

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- D. That cancellation of leave of appellant as referred in para-8 of the facts, showing appellant as absent since 04-08-2011, issuing absent notice dated 21-10-2015 & publishing absent notice in Daily News paper Aaj dated 27-01-2016 with the directions to resume duty within 15 days prove it that the appellant was an employee of E&SE Department K.P.K.
- E. That w.e.f 30-10-1988 to 24-07-2014 before proceeding on Ex-Pakistan Leave, qualifying pensionable service of the appellant was at credit 25 years 08 months & 24 days which is unblemished, keeping these facts respondents was required to deal the case of appellant with sense of responsibility and as per law/laid down procedure but appellant have been suffered due to irresponsible attitude of Respondents.
- F. That in the situation explained in the instant service appeal it will not be out of place to mention here that the respondents have failed to adopt proper procedure as per requirements of rules/law resultantly the appellant has spent about 240000/- Pakistani rupees (one sided) on travel from Ukraine to Pakistan for resumption of duty and also facing mental torture due to irresponsible attitude and unlawful act of Respondents.
- G. That the impugned action of the respondents is against the principle of Natural justice and arbitrary, and calling for interfering by this Honorable Service Tribunal.
- H. That the Petitioners seeks leave of this Honorable Tribunal to agitate additional Grounds at the time of Hearing of this Appeal.
- I. That the appellant is principally entitled for resumption of duty against any vacant post of PST in the existing Govt. Girls Primary Schools of District Haripur being an employee of E&SE Department K.P.K to continue her service being an employee of E&SE Department K.P.K District Haripur.

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, necessary directions may graciously be passed out to the Respondents to set-aside the impugned Notification dated 07-04-2016 and Letter No:9811-15 Dated 20-10-2016 regarding cancellation of leave of appellant already sanctioned. Moreover arrival report of appellant submitted to DEO (F) Haripur w.e.f 09-02-2016 regarding resumption of duty be

Annex - CM 17 (62)

BEFOR THE KHYBER PAKHTUN KHA WA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2016

Mst. Saima Mehmood, PST GGPS Kotla(Haripur) resident of village & P/O Laban Bandi
Tehsil & District Haripur (Appellant)

VERSUS

1. The Secretary (E & SE) Department, K.P.K Peshawar & 2 Others.

(Respondents)

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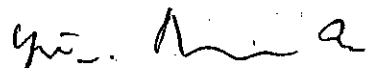
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Appellant

Through Counsel

Dated 28/06/2016.


Sajid-ur-Rehman Khan
Advocate Haripur Bar

BEFOR THE KHYBER PAKHTUN KHAWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2016

Mst. Saima Mehmood, PST GGS Kotla(Haripur) resident of village & P/O Laban Bandi
Tehsil & District Haripur

(Appellant)

VERSUS

1. The Secretary (E & SE) Department, K.P.K Peshawar.
2. The Director of (E & SE) Department, K.P.K Peshawar.
3. The District Education Officer (F) District Haripur.

(Respondents)

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 READ WITH
SECTION 19(2) OF CIVIL SERVANTS E&D RULES,2011.

PRAY:-

ON ACCEPTANCE OF THE INSTANT APPEAL IT IS HUMBLY PRAYED
THAT NECESSARY DIRECTIONS MAY GRACIOUSLY BE PASSED OUT TO
THE RESPONDENTS TO SET-ASIDE THE IMPUGNED NOTIFICATION DATED
07-04-2016 & LETTER NO.9811-15 DATED 20-10-2016 REGARDING
CANCELLATION OF LEAVE OF APPELLANT ALREADY SANCTIONED.
MOREOVER ARRIVAL REPORT OF APPELLANT SUBMITTED TO DEO (F)
HARIPUR W.E.F 09-02-2016 REGARDING RESUMPTION OF DUTY BE
ACCEPTED BY ALLOWING ALL BACK BENEFITS OF SERVICE INCLUDING
SALARY FROM THE DATE OF ARRIVAL TO ONWARD OR ANY OTHER
RELIEF WHICH THIS HONORABLE SERVICE TRIBUNAL DEEM FIT IN THE
INTEREST OF JUSTICE.

Respectfully Sheweth:-

It is submitted that the brief facts/grounds giving arise to the constitution of
this appeal are as appended below:-

FACTS:-

- 1- That the appellant joined the service in Elementary & Secondary Education Khyber
Pakhtunkhwa as PST at GGS Laban Bandi Tehsil & District Haripur on 30-10-
1988.(Photo Copy of S. Book is annexed as Annexure-A)

- M-3 (65)
- 2- That vide Notification No.SO(PE)5-2/118/Saima-Mehmood Dated 03-09-2007 issued by Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department the service of appellant was deputed on the disposal of Federal Directorate of Education Islamabad for initial period of 3 years(**Copies annexed as Annexure-B**).
 - 3- That on 12-09-2013 vide No. F.2013/P.A-Dep/14-16-17/(W)FDE Govt: of Pakistan Federal Directorate of Education Islamabad send a letter to Section Officer (Primary) E&SE Department Govt: of K.P.K Peshawar for obtaining consent/NOC of Provincial Govt: for placement of name of appellant before Committee for Permanent absorption, with the condition that " The name of above teacher will be considered for permanent absorption in the light of recruitment rule subject to approval by the Departmental Selection Committee/CA &D Division Islamabad on the condition that completion of 05 years deputation period, meet the wedlock policy, fulfillment of codal &procedural formalities, availability of posts. If the services of above named teacher not absorbed on permanent basis by DSC/CA&DD due to lack academic/professional qualification OR not fall in the recruitment rule OR any other deficiencies the FDE will be not bound to absorbed her services on permanent basis under FDE on the basis of this letter. 4. This letter does not confer any right or claim of permanent absorption."(**Copy annexed as Annexure-C**)
 - 4- After that instead of giving consent/NOC the service of appellant was placed at the disposal of Federal Directorate of Education, on permanent basis, vide Notification No. SO(PE)5-2/IPT/Haripur/Saima /PST/2013 by Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 30-09-2013. (**Copy is annexed as Annexure-D**)
 - 5- That in year 2014 the appellant applied for Ex- Pakistan Leave for two years to the Federal Directorate of Education, Islamabad from 25-07-2014 to 24-07-2016 without pay on private affairs to proceed to Ukraine where her husband named Tahir Ayub was/ is an employee in Pakistan Embassy in Ukraine but Federal Govt: refused request of appellant with the remarks that "Only her Parent department can sanction this leave" vide letter No.F.5-34/2014-FDE(S) dated 21-07-2014 (**Photocopies are annexed as Annexure-E**).
 - 6- That in compliance with the remarks endst: in the refusal letter of Federal Govt: referred in para 5 above the appellant applied to DEO (F) Haripur who is competent authority in the case of appellant for grant of leave/NOC to proceed abroad which

M-4 (66)

was accordingly allowed by DEO (F) Haripur vide No.3725-27 dated 04-08-2014 and No.3730 of even date with an information letter to Director Schools (Female) Federal Directorate of Education Islamabad. (Photocopies are annexed as Annexure-F).

- 7- That during Ex-Pakistan Leave Govt: of Pakistan Federal Directorate of Education vide Notification No.F.1-9/141-MTT(Deputationist)FDE dated 19-01-2015 the appellatant was repatriated to her parent department with immediate effect with the direction to report back to her parent department. (Copy is annexed as Annexure-G).
- 8- That on 20-10-2015 DEO(F) Haripur cancelled leave granted to the appellatant vide its letter No.9811-15/DEO(F)/Haripur/Est:Pry/Cancellation EPL, with the remarks that the teacher concerned is absent since 04-08-2010.(Copy is annexed as Annexure- H).
- 9- That on next day dated 21-10-2015 DEO (F) Haripur issued an absent notice to the appellatant on her home address with the direction to report within 15 days otherwise Ex-part action shall be taken against her under Khyber Pakhtunkhwa E&D Rules 2011. (Copy is annexed as Annexure-I)
- 10- That on 27-01-2016 DEO (F) Haripur published a notice in Daily News paper Aaj Abbottabad with the directions to the appellatant to resume duty within 15 days and also explain for reason of absent. (Copy is annexed as Annexure- J)
- 11- That in response to absent notices referred in Para 9 & 10 the appellatant come back from Ukraine along with two kids after paying about Rs: 240000/- fair of aero plain one side and submitted her arrival to DEO(F) Haripur on 09-02-2016 but instead of acceptance of arrival DEO(F) Haripur served upon the appellatant a show cause notice vide No.1440-44/DEO(F) Haripur/Estab:Pry/Saima Mehmood dated 18-02-2016, which was on receipt accordingly replied by the appellatant. (Copies are annexed as Annexure-K)
- 12- That lastly on 07-04-2016 DEO(F) Haripur passed out a Notification according to Para-4 of the said notification concluded Para it has been added that " And whereas, as in evident from the aforementioned letter, she has been no more an employee of this department since 01-10-2013, therefore the disciplinary proceedings stated in ignorance against her and withdrawn aab initio and she is directed to report to the

m-5 (67)
Federal Directorate of Education, Islamabad for any kind of relief or leave, being its permanent employee. (Copy annexed as Annexure-L).

13- That against the Notification dated 07-04-2016 issued by DEO (F) Haripur a Departmental Representation was preferred by the appellant to worthy Director E&SE Khyber Pakhtunkhwa (Appealed Authority) on 12-04-2016, but not received respond within stipulated period of 60 days, (Copy is annexed as Annexure-M) hence this appeal is being filed inter alia on the following grounds.

GROUND:-

- A. That a letter of Federal Govt: dated 12-09-2013 (referred in Para 3 of the facts) was for obtaining consent/NOC for placement of the case of the appellant before Committee of Federal Govt: to examine the eligibility for permanent absorption, subject to approval by Departmental Selection Committee CA &D Division Islamabad, but Section Officer (Pry) Govt: E&SE Department K.P.K vide letter dated 30-09-2013 (referred in Para 4 of the facts) instead of given consent/NOC in this regard, placed the service of appellant on the disposal of Federal Directorate of Education, Islamabad on permanent basis which was not the mandate of provincial Govt: of K.P.K E&SE department hence was not consider by the Federal Govt: Moreover the case of appellant was not approved by the said Committee of Federal Govt: for permanent absorption to the appellant as Federal Govt: employee of Education Department.
- B. That when DEO (F) Haripur being competent authority in case of appellant was sanctioned Ex- Pakistan Leave and also accorded NOC for proceeding abroad in favour of appellant and informed about this action to the concerned Director of Schools Female Federal Directorate of Education Islamabad vide her letter No. 3728 dated 04-08-2014 there was no reason to deny for the acceptance of arrival of appellant by DEO(F) Haripur for resumption of duty w.e.f 09-02-2016 which was given by the appellant in response to notices served upon the appellant by DEO (F) Haripur.
- C. That as referred in para-7 of the facts Federal Directorate of Education, Islamabad vide letter dated 19-01-2015 repatriated to the appellant to her parent department because by accepting directions in the letter of Federal Govt: dated 21-07-2014, competent authority of Provincial Govt: i.e DEO (F) Haripur was already accorded Ex- Pakistan Leave and NOC for proceeding abroad in favor of appellant

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considering her employee of E&SE Department K.P.K District Haripur. Hence the impugned order is illegal and unlawful and against the facts on record and liable to be set aside.

- D. That cancellation of leave of appellant as referred in para-8 of the facts, showing appellant as absent since 04-08-2011, issuing absent notice dated 21-10-2015 & publishing absent notice in Daily News paper Aaj dated 27-01-2016 with the directions to resume duty within 15 days prove it that the appellant was an employee of E&SE Department K.P.K.
- E. That w.e.f 30-10-1988 to 24-07-2014 before proceeding on Ex-Pakistan Leave, qualifying pensionable service of the appellant was at credit 25 years 08 months & 24 days which is unblemished, keeping these facts respondents was required to deal the case of appellant with sense of responsibility and as per law/laid down procedure but appellant have been suffered due to irresponsible attitude of Respondents.
- F. That in the situation explained in the instant service appeal it will not be out of place to mention here that the respondents have failed to adopt proper procedure as per requirements of rules/law resultantly the appellant has spent about 240000/- Pakistani rupees (one sided) on travel from Ukraine to Pakistan for resumption of duty and also facing mental torture due to irresponsible attitude and unlawful act of Respondents.
- G. That the impugned action of the respondents is against the principle of Natural justice and arbitrary, and calling for interfering by this Honorable Service Tribunal.
- H. That the Petitioners seeks leave of this Honorable Tribunal to agitate additional Grounds at the time of Hearing of this Appeal.
- I. That the appellant is principally entitled for resumption of duty against any vacant post of PST in the existing Govt: Girls Primary Schools of District Haripur being an employee of E&SE Department K.P.K to continue her service being an employee of E&SE Department K.P.K District Haripur.

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, necessary directions may graciously be passed out to the Respondents to set-aside the impugned Notification dated 07-04-2016 and Letter No.9811-15 Dated 20-10-2016 regarding cancellation of leave of appellant already sanctioned. Moreover arrival report of appellant submitted to DEO (F) Haripur w.e.f 09-02-2016 regarding resumption of duty be

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accepted by allowing all back benefits of service including salary from the date of arrival to onward in the interest of justice.

It is further prayed that the instant Service appeal may graciously be accepted with cost please.

Appellant

Through Counsel

Dated 28 /06/2016.

Yr. N. a
Sajid-ur-Rehman Khan
Advocate Haripur Bar


BEFOR THE KHYBER PAKHTUN KHA WA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2016

Mst. Saima Mehmood, PST GGPS Kotla(Haripur) resident of village & P/O Laban Bandi
Tehsil & District Haripur (Appellant)

VERSUS

1. The Secretary (E & SE) Department, K.P.K Peshawar & 2 Others.

(Respondents)

AFFIDAVIT

I Sajid ur Rehman Khan Advocate High Court Counsel for
appellant do hereby solemnly affirmed and declare on oath that as per
information provided by my client, the contents of Service Appeal are
true and correct to the best of my knowledge and belief and nothing has
been suppressed/concealed from this Honorable Service Tribunal.


Deponent

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

70

CM No. _____/2021

IN

Appeal No 1256/2016

Mst. Saima Mehmood V/S Secretary (E&SE) etc

SERVICE APPEAL NO. 1256

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APPLICATION SEEKING IMPLEMENTATION OF ORDER

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5			
6			
7			
8	Wakalat Nama		"

Dated 05/07/2021

Appellant Saima Mehmood

Through Counsel

.....
Advocate High Court
At Haripur

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

CM No. _____/2021
IN
Appeal No **1256/2016**

Mst. Saima Mehmood, PST GGPS Kotla (Haripur) resident of
Village and Post Office Laban Bandi Tehsil and District Haripur
..... **Petitioner**

VERSUS

1. Secretary (E&SE) Department Khyber Pakhtunkha Peshawar
2. Director (E&SE) Department Khyber Pakhtunkha Peshawar
3. District Education Officer (Female) District Haripur

..... **Respondents**

SERVICE APPEAL NO. 1256/2016

=====

**ON ACCEPTANCE OF THE INSTANT APPLICATION,
RESPONDENT NO.1 MAY KINDLY BE DIRECTED TO
IMPLEMENT THE ORDER DATED 20.06.2019 OF THIS
HONOURABLE COURT PASSED IN TRUE LETTER & SPIRIT**

=====

Respectfully Sheweth:-

1. That the petitioner filed the service appeal against the impugned Notification dated 07.04.2014 and letter No.9811-15 dated 20.10.2016 regarding cancellation of leave of appellant already sanctioned by the respondent No.3 and be directed to pay the salary from the date of arrival dated 09.02.2016 to onward alongwith all back benefits. Copy of service appeal is annexed as **Annexure**

"A".

2. That after hearing, this Honorable Court accepted the appeal of appellant on dated 20.06.2019 which is reproduced below:-

"In the circumstances, we consider that it would be in the interest of justice to remit the case back to the respondent No.2 for decision of departmental appeal/representation of appellant in accordance with the relevant law/rules after thorough scrutiny of the record. The requisite decision shall be made within a period of sixty days from the receipt of copy of instant judgment. The appellant may also be provided opportunity of personal hearing and setting forth her defence"

Copy of order dated 20.06.2019 is annexed as Annexure "B"

3. That the case was remit the back to the respondent No.2 for decision of departmental appeal within 60-days from receipt of copy of instant judgment but the respondent No.2 did not decided the case within time neither has provided opportunity of personal hearing of appellant.
4. That the act of respondents is highly contumacious which need to be dealt with iron hand by giving exemplary punishment for deliberately and willfully disobeying the orders of this Honourable Court.
5. That valuable rights of the petitioner are involved.

It is, therefore, humbly prayed that on acceptance of the instant application, respondent no.2 may kindly be directed to implement the order dated 20.06.2019 of this honourable court passed in true letter & spirit and respondent be directed to pay the salary from the date of arrival dated 09.02.2016 to onward alongwith all back benefits. Any other relief which this Honorable Court deem proper may also be granted in the best interest of justice.

Dated 05/07/2021

Appellant

Through Counsel

Advocate High Court
At Haripur

VERIFICATION

Verified on oath that the contents of the application for implementation of order is true and correct to the best of my knowledge and nothing has been concealed from this Honourable Court

Dated 05/07/2021

Appellant

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

(75)

CM No. _____/2021
IN
Appeal No 1256/2016

Mst. Saima Mehmood V/S Secretary (E&SE) etc

SERVICE APPEAL NO. 1256

=====

APPLICATION SEEKING IMPLEMENTATION OF ORDER

=====

AFFIDAVIT

I, Mst. Saima Mehmood, PST GGPS Kotla (Haripur) resident of Village and Post Office Laban Bandi Tehsil and District Haripur do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 5/07/21

Saima Mehmood
Deponent
Mst. Saima Mehmood



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

NOTIFICATION

1. **Whereas**, appellant namely Saima Mahmood joined E&SE Department as PST teacher at GGPS Laban Bandi District Haripur on dated 30-10-1988. During the course of service, the teacher concerned was deputed to the Federal Directorate of Education, Islamabad for initial period of three (03) years w.e.f. 04-08-2007 to 03-08-2010 vide Notification dated 03-09-2007.
2. **And whereas**, on completion of the desired period of three (03) years of deputation, the teacher concerned did not report to the parent department/DEO (Female) Haripur and consequently, she was reported as absent from her official duty. Moreover, the teacher concerned got extension in her deputation vide allegedly fake and forged letter for having no diary/dispatch number & date.
3. **And whereas**, in the meanwhile, on the request of Deputy Director (Schools) FDE, Islamabad vide letter dated 12-9-2013, the Respondent Department has granted NOC to the appellant for permanent absorption to Directorate of FDE, Islamabad vide letter dated 30-9-2013 without retaining her lien in E & SE Department.
4. **And whereas**, during course of service, the appellant applied for Ex-Pakistan leave/Extra Ordinary Leave/NOC w.e.f. 25-07-2014 to 24-07-2016 to the Director General, Directorate of Education Islamabad, where upon it was rejected with the remarks that "only her parent department can sanction this leave". In the meanwhile, the Competent Authority issued absence notice dated 21-10-2015 duly published in Daily Aaj, Peshawar on 27-1-2016, followed by the order dated 7-4-2016 of DEO Female Haripur, whereby the appellant was directed for the resumption of her official duty against the PST post in FDE Islamabad as she was no more of employee of E & SE Department since 1-10-2013.
5. **And Whereas**, aggrieved from the notification dated 07-04-2016, the appellant filed Service Appeal No.1258/2016, which was decided vide judgment dated 20-6-2019, whereby the case was remitted to the Respondent No.2 / Director E & SE for disposal of the same, where upon, the case was referred to the Appellate Committee Meeting held on 11-8-2022 under the Chairmanship of Worthy Director E & SE. An opportunity of personal hearing was also afforded to the appellant. The Committee unanimously concluded that the appellant is not entitled to be re-instated against the post in question on the grounds that the appellant has permanently been absorbed in FDE Islamabad vide order dated 30-9-2013.

Now therefore, in pursuance of the judgment dated 20-06-2019 of the Honorable Service Tribunal, consulting with the recommendation of the inquiry committee and having gone through the whole case record, the undersigned, being appellate authority in the instant case, is of the considered opinion that Mst. Saima Mahmood, Ex-PST is not entitled to be allowed for resumption of duty as PST in E&SE Department on the grounds of her permanent absorption in the FDE, Islamabad vide order 30-9-2013, hence, the appeal of the appellant stands rejected in view of the above said terms with immediate effect and in the interest of public service.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No: 5317-21 /F.No. AD(Lit-II)/Notification/2022 Dated Peshawar the: 26/9/2022

Copy forwarded for information & n/action to the:-

- 1 Registrar Honorable Service Tribunal Khyber Pakhtunkhwa.
- 2 PA to Additional Secretary (G) E&SED Khyber Pakhtunkhwa Peshawar.
- 3 District Education Officer (Female) District Haripur.
- 4 Mst. Saima Mahmood, Ex-PST, District Haripur.
- 5 PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
- 6 Master file.

Deputy Director (Estab/F-I)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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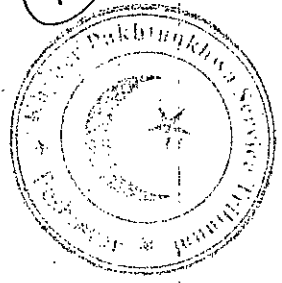
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

125/21

CM No. ~~078~~ /2021

IN

Appeal No 1258/2016



Mst. Saima Mehmood, PST GGPS Kotla (Haripur) resident of Khyber Pakhtunkhwa
Village and Post Office Laban Bandi Tehsil and District Haripur

..... Petitioner No. 918

VERSUS

Dated 08/07/2021

1. Secretary (E&SE) Department Khyber Pakhtunkha Peshawar
2. Director (E&SE) Department Khyber Pakhtunkha Peshawar
3. District Education Officer (Female) District Haripur

..... Respondents

SERVICE APPEAL NO. 1258/2016

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**ON ACCEPTANCE OF THE INSTANT APPLICATION,
RESPONDENT NO.1 MAY KINDLY BE DIRECTED TO
IMPLEMENT THE ORDER DATED 20.06.2019 OF THIS
HONOURABLE COURT PASSED IN TRUE LETTER & SPIRIT**

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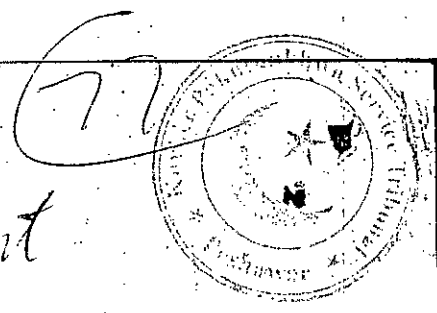
Respectfully Sheweth:-

1. That the petitioner filed the service appeal against the impugned Notification dated 07.04.2014 and letter No.9811-15 dated 20.10.2016 regarding cancellation of leave of appellant already sanctioned by the respondent No.3 and be directed to pay the salary from the date of arrival dated 09.02.2016 to onward alongwith all back benefits. Copy of service appeal is annexed as **Annexure "A"**.

Certified to be true copy


OFFICER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

E.P. No. 125/2021
 in Appeal No. 1258/2016
 Saima Mahmood vs Govt

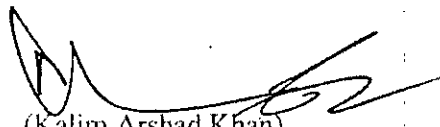



3rd Nov, 2022

1. Learned counsel for the petitioner present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

02. Learned counsel for the petitioner submits that since the respondents have rejected the departmental appeal of the petitioner which needs to be challenged and he has instruction from the petitioner to challenge the said order. He was however, objecting that the respondents had not complied with the directions contained in the judgment, especially the authority has not thoroughly perused the record and has not passed the legal order but with all fairness he submitted that such matter could be brought in the fresh course of action after rejection of departmental appeal as that cannot be agitated in the execution petition when once the departmental appeal was rejected. Disposed of in the above terms. Consign.




3. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 3rd day of November, 2022.*


 (Kalim Arshad Khan)
 Chairman

Certified to 
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

Date of Presentation of Petitioner 03/11/2022
 No. of Petitioner 800
 No. of Respondent 10/-
 Total 10/-
 Date of Presentation of Respondent 16/11/22
 Date of Belief 07/12/22

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قیمت 50 روپے	56003			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: B.C. 14.4735				
رابطہ نمبر: 0313-9551364				

بعدالت جناب: *سید سجاد حسین شاہ*

منجانب: <i>ایس ایچ</i>	دعویٰ:
<i>۱۴۸</i>	علت نمبر:
<i>بنام</i>	مورخہ:
<i>مسٹر سید سجاد حسین شاہ</i>	جرم:
	تھانہ:

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ *پشاور بار کونسل* کے آفیسر کیلئے *سید سجاد حسین شاہ* کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی 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 یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا احد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 22-12-20

الع بد **گواہ شد** الع بد
مقام *سید سجاد حسین شاہ*

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Saima Mahmood
سید سجاد حسین شاہ