

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL No 1372 OF 2022

Khyber Pakhtunkhwa
Service Tribunal

2943

Muhammad Nabi, Ex-Chowkidar (BPS-01) GGPS Segloo Seo, Kohistan dated 13-1-2023

Appellant

VERSUS

1. The Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (F), District Kohistan, Khyber Pakhtunkhwa, Peshawar.


Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1,2 & 3.

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Dated 03 -01-2023


Respondent No. 3
District Education Officer,
(Female) Kohistan Upper

(17)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL No 1372 OF 2022

Muhammad Nabi, Ex-Chowkidar (BPS-01) GGPS Segloo Seo, Kohistan

Appellant

VERSUS

1. The Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (F), District Kohistan, Khyber Pakhtunkhwa, Peshawar.

Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1,2 & 3.

Respectfully Sheweth:

PRI LIMINARY OBJECTIONS:-

- I. That the appellant has no cause of action/locus standi to file the instant appeal.
- II. That the appellant has concealed the material facts from the honorable tribunal
- III. That the appellant has not come to this honorable tribunal with clean hands.
- IV. That the appellant has filed the instant appeal on malafide grounds.
- V. That the appeal is against the prevailing law and rule.
- VI. That the appellant is estopped by his own conduct to file instant appeal.
- VII. That the claim of the appellant is unlawful, hence the appeal is liable to dismissed.

Factual Objections:

1. Para No.1 of the appeal relates to appellant's service record, hence no comment.
2. Para No.2 of the appeal relates to appellant's service record, hence no comment.
3. Para No.3 of the appeal relates to appellant's service record, hence no comment.
4. Para No.4 is incorrect hence denied as the appellant has been treated as per rule and law, that the appellant was found absent by the ADEO circle. Show cause notice was served to the appellant, but the appellant neither joined his duty nor

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submitted convincing replies within a stipulated time period. That after fulfillment of all Codal formalities the respondent issued his compulsory retirement order on 19-09-2021.

(Copy of ADEO reports, Show Cause notice and compulsory retirement order is annexed as "annexure A").

5. Para No.5 is incorrect, hence denied as the appellant did not submit appeal before the appellate authority in time. His appeal is badly time barred and the authority rejected his appeal.

(Copy of appeal rejection by the authority is annexed as "annexure B").

6. Para No.6 that the appellant is not aggrieved one, his appeal is badly time barred, and the appellant did not come to this tribunal with clean hands, hence liable to be dismissed with cost.

GROUNDS

A). Para of the ground 'A' is incorrect, hence denied as the appellant has been treated as per rule and law. A detail reply has been given in Para No.4 & 5 of factual objection.

B). Para of the ground 'B' is incorrect. Detail reply has been given in Para.4 & 5 of factual objections.

C). Para of the ground 'C' is incorrect hence denied as the reply is given in Para No.5 of factual objections.

D). Para of the ground 'D' is incorrect hence denied as the reply is given in above Para. No.4 of factual objections.

E). Para of the ground 'E' is incorrect hence denied as the respondent has issued the show cause notice to the appellant and ASDEO circle also reported him as absent from his duty.

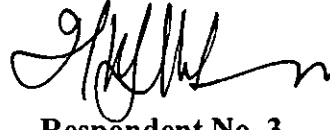
F). Para of the ground 'F' is incorrect. The impugned order is according to law and rule.

G). Para of the ground 'G' is incorrect hence denied as stated above Para No.4 & 5 of factual objections.

H). That the respondents seek permission to advance other grounds and proofs at the time of hearing.

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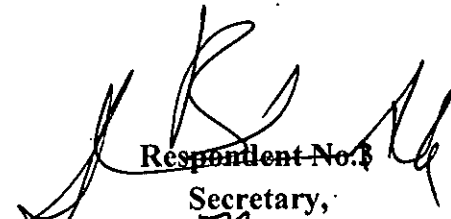
It is therefore, in the light of above stated facts and circumstances. It is Very humbly prayed that appeal being badly time barred and devoid of merit may please be dismissed with cost.



Respondent No. 3
District Education Officer,
(Female) Kohistan Upper



Respondent No.2
DIRECTOR
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



Respondent No.1
Secretary,
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

(43)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

APPEAL No 1372 OF 2022

Muhammad Nabi, Ex-Chowkidar (BPS-01) GGPS Segloo Seo, Kohistan

Appellant

VERSUS

1. The Secretary, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (F), District Kohistan, Khyber Pakhtunkhwa, Peshawar.

Respondents

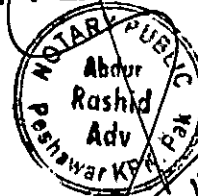
JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1,2 & 3..

AFFIDAVIT

I, Mr. Shah Wali Ullah representative on behalf of the DEO (F) Kohistan Upper is hereby solemnly affirm and declare that the contents of foregoing comments of the appeal No.1372/2022 titled Muhammad Nabi Versus Govt: of KPK are true and correct to the best of my knowledge and belief and nothing is being suppressed from the honorable tribunal.


DEPONENT

ATTESTED



13/11/2022

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Handwritten initials

OFFICE OF THE ASSISTANT SUB DIVISIONAL EDUCATION OFFICE (F) KANDIA
KOHISTAN UPPER

No. _____ /ASDEO (F) KH Dated Dassu the _____ /2021

To
The Sub Divisional Education Officer
(Female) Dassu Kohistan

Subject: - Visit Report of ASDEO (F) Circle Seo Kandia for the month of 05/2021

S/No	Dated	Name of School	Observation	Remarks
1	24/05/2021	GGPS Kai Rustom Abad ✓	During my surprise visit the said school was again found closed there were no teaching staff nor the class IV. As the detail of teaching and non-teaching are staff as under 1. Mst: Maryam Bibi PST (Absent) ✓ 2. Mst: Samina Kosar PST (Absent) ✓ 3. Mst: Anliu Babar PST (Absent) → Removal ✓ 4. Mr. Shah Nawaz, Chowkidar (Absent) ✓ Report are already has been submitted dated on 29 March 2021. But not take action	Surprise Visit ✓
2	25/05/2021	GGPS Kuz Kamila ✓	The undersigned paid a surprise visit of said school was found closed Mst Gul Nasreen SPST was on leave due to her son fixture of leg and admitted CMH Hospital in Rawalpindi while MST Maryam Anwar PST still found absent from their duty w.e.f. 1 st October 2020 to up till now. Report are submitted already for your perusal and necessary action pleas.	Surprise Visit ✓ Stc issued ✓
3	26/05/2021	GGPS Sagloo ✓	During my surprise visit the school was found again closed and MST: Fazilat Begum Pst, Mst: Kalsoom Bibi Pst & Class IV Mr. Muhammad Nabi were found Absent from their duties & also already report has been submitted dated on 28/04/2021 but not take action against said staff. Note: Absent Gul Pst Apply for retirement and case was under process in DEO Office female	Surprise Visit ✓
4	26/05/2021	GGPS Tayyab Abad ✓	The undersigned visit of the said school was found again closed. Mst: Kalsoom Bibi Pst Mst :Asma Saif Pst & Cass IV Mr. imran Khan were found absent from their duties already report has been submitted dated on 01/04/2021 28/04/2021 but not take action again said staff. Note: Absent Saif Pst apply for retirement and case was under process in DEO Office Female.	Surprise Visit ✓

Report is submitted for further necessary action please.

ASDEO (F) SEO Kandia
Kohistan.

29/05/2021

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**OFFICE OF THE ASSISTANT SUB DIVISIONAL EDUCATION OFFICE (F) KANDIA
KOHISTAN UPPER**

No _____ /ASDEO (F) KH Dated Dassu the _____ /2021

To
The Sub Divisional Education Officer
(Female) Dassu Kohistan

Subject: - Visit Report of ASDEO (F) Circle Seo Kandia for the month of 06/2021

(No)	Dated	Name of School	Observation	Remarks
2	02-06-2021	GGPS Seglo	I have paid a surprise visit the said school was closed again and again closed. There are no teaching staff and not the class IV. My last surprise visit the said school was also found closed dated on 28-04-2021, 20-05-2021 but not take action against the said staff. Detail of the said school are as under: 1. Mr. Fazilat Begum PST (749200) (Absent) ✓ 2. Mr. Kalsoom Bibi PST (729517) (A) ✓ 3. Mr. Musrat Gul PST (331920) (A) ✓ 4. Mr. Muhammad Nahi Class IV (43976) were found absent from their duties without intimation of the office. And reports are already submitted for your perusal and necessary action. Note: Musrat Gul PST applied for retirement and case was under process in D.O. Office female.	✓
7	02-06-2021	GGPS Tayab Ahsol	During my surprise visit the Class IV Mr. Imaan Khan was present in the school while the teaching staff namely Mr. Kalsoom Bibi PST (729523), Mr. Arofa Hani PST (499187) were again and again absent without intimation of the office. It is communicated with community that the teachers were appointed in this school but she performing regularly duties due to this our female children's were deprived of proper education. I submitted the school reported several times dated on 01-04-2021, 28-04-2021, 20-05-2021 and now but not take action about this school staff.	Surprise Visit ASD SIC ✓
3	07-06-2021	GGPS Thodai	During my surprise visit the said school was again found closed there were no teaching staff and not class IV. My last surprise visit the said school was also found closed dated on 04 May 2021 but not take action against the said staff are as under: 1. Mr. Gul Nisar PST (388474) Absent 2. Mr. Gul Toy PST (388434) Absent 3. Mr. Ajab Khan Class IV (337285) Absent Showcase noticed already issued dated on 7 Feb 2021 but not interested and serious to given reply up till now it is humbly requested to take strict action against the said school staff.	✓
4	07-06-2021	GGPS Karang	The undersigned visit of said school was found again closed. There were no teaching staff and not the non-teaching staff. All school staff were found again absent from their duties. My last SQM visit the said school was also found closed dated on 11-04-2021 but not take action these staff, local community verbally and written statement that the all school staff permanently absent many year. Local community are again requested higher authorities to please look into this matter and take action against these teachers. So the female's students can get proper education. The monitoring team is not reported about school staff. My last report already submitted for your perusal and necessary action. The detail of the said school staff are as under: 1. Mr. Anisat Bibi PST (332266) (Absent) ✓ 2. Mr. Shahnaz Aliya PST (499172) (A) ✓ 3. Mr. Muhammad Kabir Class IV (331749) (Absent) ✓ Therefore, it is humbly requested to take strict action above mentioned staff under the E&D rule 2011.	Surprise Visit ✓
5	10-06-2021	GGPS Khel (Gabra)	At the time of my surprise visit the said school was found again closed. All school staff were absent from their duties since long time without intimation of the office and also school record was missing physically school building was found worst in condition. My last SQM visit the said school was also found closed dated on 14-04-2021 but not take action against the said absent staff. Local community verbally and written statement that the all school staff parentally absent many years. And further reported our female children's illiterate generation to generation and also remained without getting education local community again requested to higher authorities to please look into this matter and take action against these staff. So the female students can get proper education. Monitoring team is not visit our school and nor education department. The detail of the school staff are as under: 1. Mr. Nasreen Bibi PST (436446) Absent ✓ 2. Mr. Muhrat Nidif PST (334845) (A) ✓ 3. Mr. Abida Ishaq PST (499179) (A) ✓ 4. Mr. Muhammad Dawood Class IV (Present) ✓ Therefore it is humbly requested to take strict action about the absent staff under the E&D rule 2011. My last reports already submitted for perusal and necessary action.	Surprise Visit ✓

ASDEO (F)
Circle Seo Kandia
14/6/21

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OFFICE OF THE ASSISTANT SUB DIVISIONAL EDUCATION OFFICE (F) KANDIA
KOHISTAN UPPER

No _____ /ASDEO (F) KH Dated Dassu the _____ /2021

To
The Sub Divisional Education Officer
(Female) Dassu Kohistan.

Subject - Visit Report of ASDEO (F) Circle Seo Kandia for the month of 05/2021

S/No	Dated	Name of School	Observation	Remarks
1	24/05/2021	GGPS Kai Rustam Abad ✓	During my surprise visit the said school was again found closed there were no teaching staff nor the class IV. As the detail of teaching and non-teaching are staff as under 1. Mst: Maryam Bibi PST (Absent) ✓ 2. Mst: Semina Kosar PST (Absent) ✓ 3. Mst: Amila Babar PST (Absent) → Removal ✓ 4. Mr. Shah Nawaz, Chowkidar (Absent) ✓ Report are already has been submitted dated on 29 March 2021 But not take action	Surprise Visit ✓
2	25/05/2021	GGPS Kuz Komila ✓	The undersigned paid a surprise visit of said school was found closed Mst Gul Nasreen SPST was on leave due to her son fixture of leg and admitted CMH Hospital in Rawalpindi while MST Maryam Anwar PST still found absent from their duty w.e.f. 1 st October 2020 to up till now. Report are submitted already for your perusal and necessary action pleas.	Surprise Visit ✓ S/C issued
3	26/05/2021	GGPS Sogloo ✓	During my surprise visit the school was found again closed and MST: Fazilat Begum Pst, Mst: Kalsoom Bibi Pst & Class IV Mr. Muhammad Nabi were found Absent from their duties & also already report has been submitted dated on 28/04/2021 but not take action against said staff. Note: Mst: Gul Pst Apply for retirement and case was under process in DEO Office female	Surprise Visit ✓
4	26/05/2021	GGPS Tayyab Abad ✓	The undersigned visit of the said school was found again closed. Mst: Kalsoom Bibi Pst Mst: Asma Saif Pst & Cass IV Mr. Imran Khan were found absent from their duties already report has been submitted dated on 01/04/2021 28/04/2021 but not take action again said staff. Note: Mst: Saif Pst apply for retirement and case was under process in DEO Office Female.	Surprise Visit ✓

Report is submitted for further necessary action please.

ASDEO (F) SEO Kandia
Kohistan,

29/05/2021



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gmail.com - 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency & Disciplinary, Rules 2011, do hereby serve upon you, Mr. Muhammad Kabir Chowkidar GGPS Karang for the following charges;

1. As per report of SDEO/ ASDEO Circle Seo Kandia on 07-06-2021 and 13-04-2021 you willfully remained absent from your duty and school was found closed without proper permission/intimation or leave .
2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one or more penalties in sub rule No.4(a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.

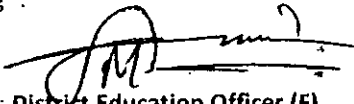
(Muhammad Amin)
District Education Officer (F)
Kohistan Upper.

Endorsement No. 4182-87

Dated: 02/08/2021.

Copies for information and necessary action forwarded to the:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The PA to District Education Officer (F) Kohistan Upper.
4. The Deputy District Education Officer (F) Dassu, Kohistan Upper.
5. Mr. Muhammad Kabir Chowkidar GGPS Karang .
6. Copy to Master File for record.


District Education Officer (F)
Kohistan Upper.

Acknowledgment: I _____ received my copy.

Signature: _____ Date: _____



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gmail.com - 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency & Disciplinary, Rules 2011, do hereby serve upon you, Mr, Ajab Khan Chowkidar GGPS Thooti for the following charges;

1. As per report of SDEO/ ASDEO Circle Seo Kandia on 07-06-2021 and 04-05-2021 you willfully remained absent from your duty and school was found closed without proper permission/intimation or leave .
2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4(a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.


(Muhammad Amin)
District Education Officer (F)
Kohistan Upper.

Endorsement No. 4164-69

Dated: 02/08 //2021.

Copies for information and necessary action forwarded to the:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The PA to District Education Officer (F) Kohistan Upper.
4. The Deputy District Education Officer (F) Dassu, Kohistan Upper.
5. Mr, Ajab Khan Chowkidar GGPS Thooti .
6. Copy to Master File for record.


District Education Officer (F)
Kohistan Upper. 4/5

Acknowledgment: I _____ received my copy.

Signature: _____ Date: _____



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gmail.com - 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency & Disciplinary, Rules 2011, do hereby serve upon you, Mr. Imran Khan Chowkidar GGPS Tayab Abad for the following charges;

1. As per report of SDEO/ ASDEO Circle Dasso on 14-07-2021 you willfully remained absent from your duty since long and up to till now without proper permission/intimation or leave and show cause notice has already issued vide this office endorsement No.4217-22 dated 02-08-2021,
2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4 (a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.

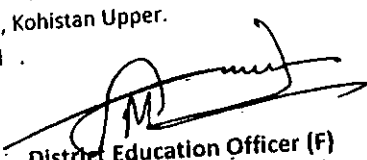
(Muhammad Amin)
District Education Officer (F)
Kohistan Upper.

Endorsement No. 4509-15

Dated: 07/19/2021.

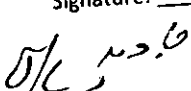
Copies for information and necessary action forwarded to the:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The PA to District Education Officer (F) Kohistan Upper.
4. The Deputy District Education Officer (F) Dasso, Kohistan Upper.
5. Mr. Imran Khan Chowkidar GGPS Tayab Abad .
6. Copy to Master File for record.


District Education Officer (F)
Kohistan Upper.

Acknowledgment: I 

received my copy.

Signature: 

Date: 8/9/2021



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN UPPER

Email: Dofemalekohistanupper@gmail.com - 0998407225

Show Cause Notice:

I, Muhammad Amin District Education officer (F) Kohistan Upper, the Competent Authority under the Khyber-Pakhtunkhwa Government Servant Efficiency & Disciplinary, Rules 2011, do hereby serve upon you, Mr. Muhammad Nabi Chowkidar GGPS Segloo for the following charges;

1. As per report of SDEO/ ASDEO Circle Dassu on 14-07-2021 you willfully remained absent from your duty since long and up to till now without proper permission/intimation or leave and show cause notice has already issued vide this office endorsement No.4152-57 dated 02-08-2021,
2. Therefore, you are directed to resume your duty immediately and show cause of your absent period with solid reasons.
3. Thus you proved negligent and subvert government official and you have committed the gross act/omissions of misconduct, inefficiency, subversion, specified in Rule 3 of the mentioned rules.

As a result, thereof, I as the Competent Authority, have tentatively decided to impose upon you, the major penalty of removal from service and recovery of illegal pay of your absent period, mentioned in Rule 4(1), (a) and (b), of the ibid Rules.

You are, therefore, required to show cause as to why one are more penalties in sub rule No.4 (a) and 4(b) provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply on your behalf to this effect is received, to this office, within 07 days of delivery of this show cause, it shall be presumed that you have no defense to put in and, in that case, Ex-parte action will be taken against you.

(Muhammad Amin)
District Education Officer (F)
Kohistan Upper.

Endorsement No. 4598-39 *o/k*

Dated: 07/09/2021 *es*

Copies for information and necessary action forwarded to the:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The PA to District Education Officer (F) Kohistan Upper.
4. The Deputy District Education Officer (F) Dassu, Kohistan Upper.
5. Mr. Muhammad Nabi Chowkidar GGPS Segloo .
6. Copy to Master File for record.

o/k
District Education Officer (F)
Kohistan Upper.

Acknowledgment: I _____ received my copy. *o/k*

Signature: *o/k, usb* _____

Date: 8/9/2021

**OFFICE OF DISTRICT EDUCATION OFFICER (Female)
KOHISTAN**

"B"
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DECLARATION OF INTEREST

01. WHEREAS as per the numerous complaints received to the undersigned through various media the following Chowkidars remained absent from their duties without any prior permission or leave for several years.
02. WHEREAS their schools remained closed/Non-functional during the repeated visits of EOA.
03. WHEREAS they were reported absent by EOA time and again during the visits of the concerned DCJAs.
04. WHEREAS they did not take attendance in the school registers at their home.
05. WHEREAS the concerned ASDEOs were directed to verify their absenteeism.
06. WHEREAS the concerned ASDEOs confirmed/verified their absenteeism as per their report.
07. WHEREAS show cause notices were issued to them vide the references made against their names.
08. WHEREAS they failed to reply their show cause/unconvincible reply within the stipulated period.
09. WHEREAS they failed to avail the chance of personal hearing.

Therefore the undersigned being the competent authority, do hereby impose Major Penalty of Compulsory Retirement, upon the following Chowkidars under Rule 4(b) & of E&D Rules 2017 with immediate effect, in the interest of public service.

S. No	Name of Teacher with designation	Name of School	Show cause reference	Remarks
01	Muhammad Nabi Chow	GGPS Sigloo	No.4152-57 dated:02/08/2021	
02	Ayub Khan Chow	GGPS Thood	No.4164-69 dated:02/08/2021	
03	Muhammad Kabir Chow	GGPS Karang	No.4182-87 dated:02/08/2021	
04	Imran Khan Chow	GGPS Tayyab Abad	No.4217-22 dated:02/08/2021	

MUHAMMAD AMIN
District Education Officer
(Female) Kohistan

09/09/2021

Ends: No. 4897-466 DEO (F) KH Dated: _____

Copy of the above forwarded to the:-

01. PS to Secretary Elementary & Secondary Education Department KPK Peshawar.
02. PA to Director Elementary & Secondary Education KPK Peshawar.
03. Deputy Commissioner Kohistan Upper.
04. District Monitoring Officer Kohistan Upper.
05. District Accounts Officer Kohistan Upper.
06. SDEO/DO (F) concerned with the directions to stop their pay and make necessary entries in the service books.
07. ASDEO Circle concerned.
08. PA to DEO (F) local office.
09. Teachers concerned.
10. Office File.

Muhammad Amin
District Education Officer
(Female) Kohistan

(13)

Better Copy

(13)

OFFICE OF THE DISTRICT EDUCATION OFFICER KOHISTAN

OFFICE ORDER COMPULSORY RETIREMENT.

01. WHEREAS per the numerous complaint received to the undersigned through various means the following chowkidar remained absent from their duties without any prior permission of leave for several years.
02. WHEREAS their school remained close/non-functional during the repeated visits of EMA.
03. WHEREAS they were report absent by EMA time and again during the visits of concerned DCMA's.
04. WHEREAS they put their fake attendance in the school registers at their home.
05. WHEREAS the concerned ASDEOs were directed to verify their absenteeism.
06. WHEREAS the concerned ASDEOs confirmed/verified their absenteeism as per their report.
07. WHEREAS show cause notices were issued to them vide the references made against their names.
08. WHEREAS they failed to reply their show causes/inconvincible reply within the stipulated period.
09. WHEREAS they failed to avail the chance of personal hearing.

Therefore the undersigned being the competent authority do hereby impose Major Penalty of Compulsory Retirement upon the following Chowkidars under Rules 4(b) ii of E&D Rules, 2011 with immediate effect, in the interest of public service.

S.N	Name of Teacher with designation	Name of School	Show Cause	Remarks
1	Muhammad Nabi Chow	GGPS Siglio	No.4152-57 Dated:02/08/2021	
2	Ajab Khan Chow	GGPS Thooti	No.4164-69 Dated:02/08/2021	
3	Muhammad Kabir Chow	GGPS Karang	No.4182-87 Dated:02/08/2021	
4	Imran Khan Chow	GGPS Tayyab Abad	No.4217-22 Dated:02/08/2021	

MUHAMMAD AMN
District Education Officer
(Female) Kohistan

Endst: No. 4597-4606/DEO(F)KH

DATED: 09/09/2021

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. _____/F.No.291/A-20/C-IV/Kohistan/Vol-5-6

Dated Peshawar the 05/09/2022

To,

The District Education Officer,
(Female) Kohistan.

Subject: APPEAL FOR RE-INSTATEMENT.

Memo:

I am directed to refer to the subject cited above and to state that the appeal in r/o Muhammad Naboi S/o Jamdad Ex-Chowkidar GGPS Saglo Kohistan Upper, Mr. Imran Khan S/o Khusra Ex-Chowkidar GGPS Tayyab abad Kohistan and Ajab Khan S/o Khan Badshah Ex-Chowkidar GGPS Thooti Kohistan & Muhammad Kabir Chowkidar has been examined/analyzed by this office. Hence inform the appellant concerned that their appeals have been rejected by the appellate authority.

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

Endst: No. 1265-66/