

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7760/2021

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

Farzana Hassan Ex-PST, GGPS Akhto Jan Bhattani, Lakki Marwat.
..... (Appellant)

Versus

1. The Secretary (E&SE) Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Female), Lakki Marwat.
..... (Respondents)

Mr. Taimur Ali Khan,
Advocate

... For appellant

Mr. Asif Masood Ali Shah,
Deputy District Attorney

... For respondents

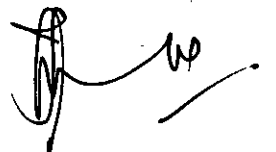
Date of Institution..... 01.11.2021

Date of Hearing..... 21.12.2022

Date of Decision..... 21.12.2022

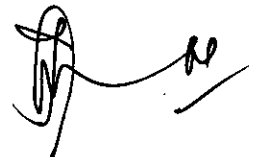
JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the order dated 30.06.2021, whereby major penalty of removal from service alongwith the recovery of all the dues paid to her without performing the government duty, if any, was imposed upon the appellant. It has been prayed that on the acceptance of this appeal, the order



dated 30.06.2021 might be set aside and the respondents be directed to reinstate the appellant into service with all back and consequential benefits.

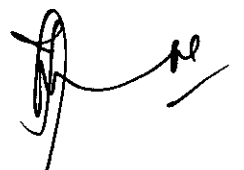
2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed on the post of PST vide order dated 04.05.2017. She was transferred from GGPS Amir Nawaz Tajori to GGPS Akhto Jan Bhattani vide order dated 23.11.2020. The family of the appellant had blood feud enmity in the location of GGPS Akhto Jan Bhattani, which was evident from the FIR annexed with the appeal, therefore, she filed an application to respondent No. 3 for cancellation of her transfer order dated 23.11.2020. Due to the enmity, she did not take charge in GGPS Akhto Jan Bhattani and continued to perform her duty at GGPS Amir Nawaz, which was evident from attendance register and Log Book of the concerned school. The appellant was called for personal hearing in which the respondent No. 3 verbally directed her to take charge of the post at GGPS Akhto Jan Bhattani till 25.06.2021, which was evident from the impugned order dated 30.06.2021 and comments of respondent No. 3 filed on the departmental appeal of the appellant. In compliance of that direction the appellant took over the charge at GGPS Akhto Jan Bhattani on 25.06.2021. She performed her duty there till her removal, as was evident from attendance register and PTC meeting minutes of GGPS Akhto Jan Bhattani. Without adopting proper procedure, the appellant was removed from service vide order dated 30.06.2021, against which she filed departmental appeal on 05.07.2021 which was not responded within the statutory period of ninety days; hence the instant service appeal.



3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Deputy District Attorney for the respondents and perused the case file with connected documents in detail.

4. Learned counsel for the appellant after presenting the case in detail contended that no proper procedure was adopted by the authority before passing the impugned removal order of the appellant, which was against the law and rules. He further contended that no charge sheet was issued to the appellant nor proper inquiry was conducted against her and she was removed from service in a slipshod manner. He further contended that during personal hearing, respondent No. 3 directed the appellant to take charge at GGPS Akhto Jan Bhattani; she complied to those orders and even then she was removed from service on the basis of absence, which was against the norms of justice and fair play. He requested that the appeal might be accepted as prayed for.

5. Learned Deputy District Attorney, while rebutting the arguments of learned counsel for the appellant, contended that the appellant being habitual absentee, was transferred to GGPS Akhto Jan Bhattani vide order dated 23.11.2020 but she never joined her new assignment and absented herself from duty. The SDEO (F) concerned circle vide letter No. 1192 dated 16.03.2021 reported that the appellant did not take over the charge after lapse of more than 176 days, therefore, a show cause notice dated

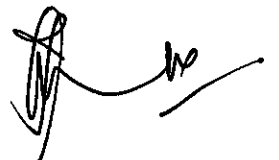


18.05.2021 was issued to the appellant and in reply to the same, she took the plea of her family dispute in that area to justify her absence from her place of duty. He further contended that the appellant did not mention in her reply to show cause notice that she performed duty in her previous school, which clearly proved that the claim of performing duty in previous school was an afterthought and she actually never performed duty there. He argued that the attendance register and log book, on which the appellant relied, were false and fabricated. Learned AAG requested that the appeal might be dismissed.

6. After going through the arguments and record presented before us, it is clear that the appellant joined the government service in 2017 as Primary School Teacher. It is further evident from the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011, presented before the bench by the learned counsel for the appellant, that appointment, posting and transfer of PSTs under its Section 3 is Union Council based. Section 3, sub-section(1) and (3) are reproduced as follows:-

“3. Appointment, posting and transfer of primary school teachers.---

(1) The vacancy of primary school teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile, on merit, and if no eligible candidate in that Union Council is available where the school is situated,

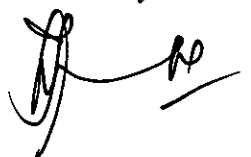


such appointment shall be made on merit from amongst eligible candidates belonging to the adjacent Union Councils:

Provided that on availability of vacancy, a primary school teacher, appointed from adjacent Union Council, as referred to in this sub-section, shall be transferred against a vacant post in a school of the Union Council of his residence within a period of fifteen days.

(3) The primary school teacher shall be transferred to other school within the Union Council on completion of tenure as may be prescribed or before completion of tenure, subject to the policy of rationalization for maintaining certain students teachers ratio, if any. "

7. When asked whether Amir Nawaz Tajori and Akhto Jan Bhattani are in the same Union Council or two different Union Councils, the departmental representative confirmed that they were two different Union Councils. When section 3 of the Act of 2011 is clear, then why the appellant was transferred from Amir Nawaz Tajori, the Union Council in which she was appointed, to Akhto Jan Bhattani, which is a different Union Council? When asked from the learned Deputy District Attorney and the departmental representative, they referred to Para-2 of the removal order dated 30.06.2021 according to which the transfer was meant to functionalize the school in Akhto Jan Bhattani. When confronted that the charge report dated 25.06.2021 annexed with the reply indicates that there was a headmistress in that school who handed over the charge to the appellant which indicates that the school had already been functionalized, the departmental representative disowned the charge report and termed it fake and bogus. Another question was put to him to respond in the light of Act No. XII of 2011, which clearly



states that appointment of PST is based on the union council of his/her permanent residence and that if no eligible candidate is available for appointment, then it is to be made on merit from amongst eligible candidates belonging to the adjacent UC, whether no candidate from Akhto Jan Bhattani was available at the time of appointment and that if no candidate was available, then why appointment was not made from the adjacent UC and why the post was being filled by transfer of a PST from another UC, which was not covered under the law? The departmental representative as well as the learned DDA could not respond to those queries.

8. From the above discussion, there is no doubt that the appellant was transferred from the Union Council in which she was appointed to another Union Council, which was against the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 and hence not sustainable and is void and being so, is liable to be set aside. The appeal is, therefore, allowed as prayed for. Parties are left to bear their own costs. Consign.

9. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 21th day of December, 2022.*


(ROZINA REHMAN)
Member (J)


(FAREEHA PAUL)
Member (E)

Service appeal No.7760/2021

21.12.2022 Mr. Taimur Ali Khan, Advocate for appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgement containing 06 pages, there is no doubt that the appellant was transferred from the Union Council in which she was appointed to another Union Council, which was against the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 and hence not sustainable and is void and being so, is liable to be set aside. The appeal is, therefore, allowed as prayed for. Parties are left to bear their own costs. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 21th day of December, 2022.*


(ROZINA REHMAN)
Member (J)



(FAREEH PAUL)
Member (E)

23.08.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Nazeer, ADEO (Litigation) alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is out of station today. Adjourned. To come up for arguments on 31.10.2022 before the D.B.


(Rozina Rehman)
Member (Judicial)

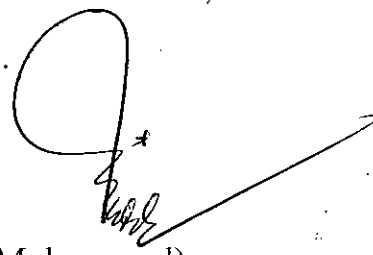

(Salah-Ud-Din)
Member (Judicial)

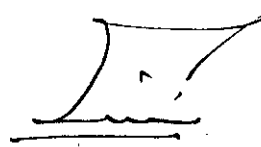
31.10.2022

Learned counsel for the appellant present. Mr. Muhammad Nazeer, ADEO alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on

21.12.2022.


(Mian Muhammad)
Member (E)


(Salah-ud-Din)
Member (J)

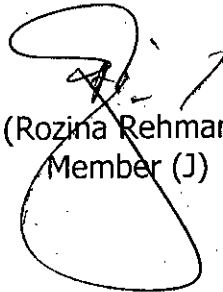
SCANNED
KINIST
POSTMASTER

07.01.2022

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments 14.03.2022.

Appellant Deposited
Security & Process Fee
07/01/22


(Rozina Rehman)
Member (J)

14.03.2022


Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 03.06.2022 for the same as before.


Reader.

03.06.2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Addl. AG alongwith Muhammad Nazeer, ADEO for the respondents present.

Written reply/comments on behalf of the respondents submitted which is placed on file. A copy of the same is handed over to the learned counsel of the appellant. To come up for rejoinder/arguments on 23.08.2022 before D.B.

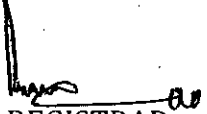
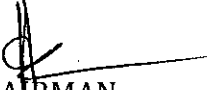

(FAREEHA PAUL)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7760/2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/11/2021	<p>The appeal of Mst. Farzana Hassan resubmitted today by Mr. Taimur Ali Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>07/01/22</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Farzana Hassan, Ex-PST GGPS Akhto Jan Bhattani, District Lakki Marwat received today i.e. on 01.11.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Index of the appeal attached with the appeal is incomplete.
2. Checklist is not attached with the appeal.
3. Appeal has not been flagged/marked with annexure marks.
4. Annexures of the appeal may be attested.
5. Affidavit is not attested by the Oath Commissioner.
6. Annexures of the appeal is not in sequence which may be placed in order.
7. Copy of charge sheet, statement of allegation and replies thereto are not attached with the appeal.
8. A copy of departmental appeal mentioned in para-2 of the appeal is not attached with the appeal.
9. Copy of rejection order in respect of appellant is not attached with the appeal which may be placed on it.
10. Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
11. Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2162 /S.T,

Dt. 01/11 /2021


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Taimur Ali Khan Adv. Pesh.

Respected Sir,

- 1- Removed
- 2- Removed
- 3- Removed
- 4- Removed
- 5- Removed
- 6- Removed
- 7- Copies of Charge sheet, Statement of allegations were not issued to the appellant,
- 8- Copy of departmental appeal is attached at page-28
- 9- Copy of departmental appeal of the appellant was not rejected.
- 10- Removed
- 11- Removed

Resubmitted after compliance
On 15/11/2021

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Farzana Hassan vs EDU Deptt.

S.#	Contents	Yes	No
1.	This appeal has been presented by: _____	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	✓
16.	Whether appeal contains cuttings/overwriting?	✓	✓
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on _____		✓
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on _____		✓
26.	Whether copies of comments/reply/rejoinder submitted? on _____		✓
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on _____		✓

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: _____

Tasnuva Ali Khan

Signature: _____

[Signature]

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 7760/2020

Farzana Hassan

V/S

Education Deptt:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	01-04
2.	Affidavit	-----	05
3.	Copies of order dated 23.11.2020, FIR, application, attendance register and Log Book	A,B,C,D&E	06-21
4.	Copies of comments, charge report, attendance register and PTC meeting minutes	F,G,H&I	22-26
5.	Copies of order dated 30.06.2021 and departmental appeal	J&K	27-30
6.	Wakalat Nama	-----	31

APPELLANT

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

Room No. Fr-8, 4th Floor,
Bilour Plaza, Peshawar Cantt:
Contact No. 03339390916

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 7760 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7843

Date 01-11-2021

Mst. Farzana Hassan Ex-PST,
GGPS Akhto Jan Bhattani, Lakki Marwat.

(APPELLANT)

VERSUS

1. The Secretary (E&SE) Khyber Pakhtunkhwa, Peshawar,
2. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Female), Lakki Marwat.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 30.06.2021, WHEREIN MAJOR PENALTY OF REMOVAL FROM SERVICE ALONG WITH THE RECOVERY OF ALL THE DUES PAID TO HER WITHOUT PERFORMING THE GOVERNMENT DUTY IF ANY, HAS IMPOSED UPON THE APPELLANT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

Filed to-day

Registrar

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 30.06.2021 MAY KINDLY BE SET ASIDE AND THE RESPONDENTS MAY KINDLY BE DIRECTED TO REINSTATE THE APPELLANT INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

Re-submitted to-day
and filed.

Registrar

16/11/2021

RESPECTFULLY SHEWTH:

FACTS:

1. That the appellant was appointed on the post of PST vide order dated 04.05.2017 and has performed his duty up to the entire satisfaction of his superiors and no complaint has been filed against the appellant regarding her performance.
2. That the appellant was transferred from GGPS Amir Nawaz Tajori to GGPS Akhto Jan Bhattani vide order dated 23.11.2020. The family of the appellant have blood enmity in the location of GGPS Akhto Jan Bhattani, which is evident from the FIR, therefore, she filed application to respondent No.3 for cancellation of her transfer order dated 23.11.2020 and due to that enmity she did not take charge in GGPS Akhto Jan Bhattani and continued to perform her duty at GGPS Amir Nawaz, which is evident from attendance register and Log Book of the concerned school. (Copies of order dated 23.11.2020, FIR, application, attendance register and Log Book are attached as Annexure-A,B,C,D&E)
3. That the appellant was called for personal hearing in which the respondent No.3 verbally directed to the appellant to take charge on the post at GGPS Akhto Jan Bhattani till 25.06.2021, which is evident from the impugned order dated 30.06.2021 and comments of respondent No.3 filed on the departmental appeal of the appellant and in the compliance of that direction the appellant took over charge at GGPS Akhto Jan Bhattani on 25.06.2021 and performed duty there till her removal which is evident from attendance register and PTC meeting minutes of GGPS Akhto Jan Bhattani. (Copies of comments, charge report, attendance register and PTC meeting minutes are attached as Annexure-F,G,H&I)
4. That without adopting proper procedure, the appellant was removed from service vide order dated 30.06.2021. The appellant filed departmental appeal on 05.07.2021 against the removal order dated 30.06.2021, which was not responded within the statutory of ninety days. (Copies of order dated 30.06.2021 and departmental appeal are attached as Annexure-J&K)
5. That the appellant has no other remedy except to file the instant appeal in this Honourable Tribunal for redressal of her grievance on the following grounds amongst others.

GROUND:


- A) That the impugned order dated 30.06.2021 and not taking action on the departmental appeal of the appellant with the stipulated period are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That no proper procedure was adopted by the authority before passing the impugned removal order of the appellant, which is against the law and rules and as such the impugned removal order dated 30.06.2021 is liable to be set aside on this ground alone.
- C) That no inquiry was conducted against the appellant and the appellant was removed in slipshod manner, which is the violation of rules and Superior Courts judgments.
- D) That no charge sheet was issued to the appellant before imposing major punishment of removal from service, which is the violation of law and rules.
- E) That the appellant was transferred to GGPS Akhto Jan Bhattani through an order dated 23.11.2020, but due to blood enmity of the family of the appellant in that location, the appellant did not report in that school and filed application to competent authority for cancellation of her transfer order dated 23.11.2020 and continue to perform her duty at GGPS Amir Nawaz Tajori and when the respondent No.3 verbally directed the appellant to take charge at GGPS Akhto Jan Bhattani till 25.06.2021 during personal hearing she took over charge on 25.06.2021 on that direction, but despite she was removed from service on basis of absence, which is against the norms of justice and fair play.
- F) That the appellant never remained absent from her duty, but due to blood enmity in the location of GGPS Akhto Jan Battahni she did not take over charge there and continuously perform her duty at GGPS Amir Nawaz Tajori, therefore the appellant was compelled to perform her duty at GGPS Amir Nawaz Tajori due to that blood enmity, therefore, needs to be treated with a lenient view.
- G) That the penalty of removal from service is very harsh which is passed in violation of law and rules, therefore, the same is not sustainable in the eyes of law and liable to be set aside.

- H) That the appellant has been condemned unheard and has not been treated according to law and rules.
- I) That the appellant seeks permission of this Honourable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Farzana
APPELLANT
Farzana Hassan

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____ /2021

Farzana Hassan

V/S

Education Deptt:

.....

AFFIDAVIT

I, Farzana Hassan Ex-PST, GGPS Akhto Jan Bhattani, Lakki Marwat, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honourable Tribunal.



Farzana
DEPONENT
Farzana Hassan
(APPELLANT)

A 6

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT

RECORDED:-

Transfer/posting of the following PST/SPSTs and PSHTs is hereby ordered in order to functionalize the non functional schools in their own pay and scale in the interest of public service with immediate effect.

Sl No	Name with Desig	From	To
1	Khursheed, PSHT	GGPS Abbasa Khattak No.1	GGPS Abbasa Wazir
2	Farzana Hassan, PST	GGPS Amir Nawaz Tajori	GGPS Akhio Jan Bhattani

NOTE:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Endsl No: 4326-30

Dated: 23/11/2020

District Education Officer (Female) Lakki Marwat

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. SDEO (F) concerned.
3. District Monitoring Officer Lakki Marwat.
4. Head Teacher/ASDEO (F) circle concerned.
5. M/File.

Received
 District Education Officer
 (Female) Lakki Marwat

District Education Officer
 (Female) Lakki Marwat

B 2

5

یہ اطلاعیں (میں) کے لئے ہیں

تاریخ نمبر 13-10-1971

ابتدائی اطلاعیں رپورٹ

سرکار ہند

ابتدائی اطلاعیں رپورٹ شدہ ذریعہ 15-10-1971 اور بعد میں اضافہ شدہ

تاریخ	مقام	موضوع
15-10-71	جھانسی	12 بجے
18-10-71	جھانسی	15 بجے
19-10-71	جھانسی	15 بجے
20-10-71	جھانسی	15 بجے
21-10-71	جھانسی	15 بجے
22-10-71	جھانسی	15 بجے
23-10-71	جھانسی	15 بجے
24-10-71	جھانسی	15 بجے
25-10-71	جھانسی	15 بجے
26-10-71	جھانسی	15 بجے
27-10-71	جھانسی	15 بجے
28-10-71	جھانسی	15 بجے
29-10-71	جھانسی	15 بجے
30-10-71	جھانسی	15 بجے
31-10-71	جھانسی	15 بجے

ابتدائی اطلاعیں (میں) کے لئے ہیں

جھانسی میں واقعہ کے بارے میں

15-10-71 کو جھانسی میں واقعہ رونما ہوا

18-10-71 کو جھانسی میں واقعہ رونما ہوا

19-10-71 کو جھانسی میں واقعہ رونما ہوا

20-10-71 کو جھانسی میں واقعہ رونما ہوا

21-10-71 کو جھانسی میں واقعہ رونما ہوا

22-10-71 کو جھانسی میں واقعہ رونما ہوا

23-10-71 کو جھانسی میں واقعہ رونما ہوا

24-10-71 کو جھانسی میں واقعہ رونما ہوا

25-10-71 کو جھانسی میں واقعہ رونما ہوا

26-10-71 کو جھانسی میں واقعہ رونما ہوا

27-10-71 کو جھانسی میں واقعہ رونما ہوا

28-10-71 کو جھانسی میں واقعہ رونما ہوا

29-10-71 کو جھانسی میں واقعہ رونما ہوا

30-10-71 کو جھانسی میں واقعہ رونما ہوا

31-10-71 کو جھانسی میں واقعہ رونما ہوا

Handwritten signature

بخدمت جنابہ ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) ضلع لکی مروت

جناب عالی!

عنوان: وضاحت شوکاز نوٹس نمبر 1796-1801 / 18/05/2021

مودبانہ گزارش کی جاتی ہے کہ سائلہ گورنمنٹ پرائمری سکول اختوجان پر PST ڈیوٹی سرانجام دے رہی ہیں اور سائلہ کی گورنمنٹ پرائمری سکول اختوجان میں ٹرانسفر ہوئی ہے۔

سائلہ کی جہاں ٹرانسفر ہوئی ہے وہاں کے لوگوں کے ساتھ ہمارے گھرانے کے 30 سے زیادہ افراد قتل مقابلے کے مسئلے چلے آ رہے ہیں۔ مزید برآں گورنمنٹ پرائمری سکول امیر نواز تجوڑی میں 200 طلباء زیر تعلیم ہیں۔ جو کہ بہت زیادہ ہیں جیسا ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ نے خود معائنہ بھی کیا ہے۔ مزید سائلہ شوگر اور بلڈ پریشر کی مریفہ بھی ہیں اور اتنی دور دراز ڈیوٹی سرانجام دینے سے سائلہ کی بیماری بڑھتی ہے۔

لہذا آپ صاحبان سے گزارش ہے کہ سائلہ کی ٹرانسفر کے احکامات کو کینسل کر کے صادر فرمائیں۔ ہمیشہ کے لئے دُعا گورہیں گے۔

مورخہ 19/05/2021

العارضہ

فرزانہ حسن PST گورنمنٹ پرائمری سکول امیر نواز تجوڑی ضلع لکی مروت

Fazana

Forwarded to SDEO (F) Lakki Marwat

RECEIVED
Diary No.
19 MAY 2021
District Education Officer
(Female) Lakki Marwat

19-05-2021

A.S.D.E.O (F)
Lakki Marwat

سازمان حمل و نقل هوایی
 رخصت‌های ماهانه
 تاریخ: 10/10/2022

شماره	ساعت	امیران	فرزان	شکفته
		8 AM	PST	PST
1	8:30	امیران		
2	8:30	امیران		
3	8:30	امیران		
4	8:30	امیران		
5	8:30	امیران		
6	8:30	امیران		
7	8:30	امیران		
8	8:30	امیران		
9	8:30	امیران		
10	8:30	امیران		
11	8:30	امیران		
12	8:30	امیران		
13	8:30	امیران		
14	8:30	امیران		
15	8:30	امیران		
16	8:30	امیران		
17	8:30	امیران		
18	8:30	امیران		
19	8:30	امیران		
20	8:30	امیران		
21	8:30	امیران		
22	8:30	امیران		
23	8:30	امیران		
24	8:30	امیران		
25	8:30	امیران		
26	8:30	امیران		
27	8:30	امیران		
28	8:30	امیران		
29	8:30	امیران		
30	8:30	امیران		
31	8:30	امیران		

10/10/2022
 ASD

امریکی ایئر لائنز کے لیے ایئر ٹائم ٹیبل
 2022 سال کے لیے

ایئر لائن	ایئر	ایئر ٹائم	ایئر	ایئر ٹائم	ایئر	ایئر ٹائم	ایئر	ایئر ٹائم	ایئر	ایئر ٹائم	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	12:00	P	8:30	Sto	12:00	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	Sunday		Sunday						
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	12:00	P	8:30	Sto	12:00	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	PITE Training		8:30	12	
ایئر ایچ خان	ایئر ایچ خان	8AM	SUNDAY								13
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sh	1:30	Sh	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	12:30	P	8:30	Sh	12:30	Sh	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	PITE Training		8:30	19	
ایئر ایچ خان	ایئر ایچ خان	8AM	SUNDAY								20
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sto	1:30	Sto	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sh	1:30	Sh	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM	P	1:30	P	8:30	Sh	1:30	Sh	8:30	
ایئر ایچ خان	ایئر ایچ خان	8AM									25
ایئر ایچ خان	ایئر ایچ خان	8AM									26
ایئر ایچ خان	ایئر ایچ خان	8AM									27
ایئر ایچ خان	ایئر ایچ خان	8AM									28
ایئر ایچ خان	ایئر ایچ خان	8AM									29
ایئر ایچ خان	ایئر ایچ خان	8AM									30
ایئر ایچ خان	ایئر ایچ خان	8AM									31

ASD
 27/2/2022

ایئر ایچ خان

روزنامہ فوجی مدرسہ سوات

سی جی بی ایس میرٹھ بابت ماہ جنوری سال ۱۹۸۰ء

سائز چیل تجوری

سکینہ	سلاٹ	امیرات	امیرات	امیرات	امیرات	امیرات	امیرات	امیرات	امیرات
		8AM	10PM	8AM	10PM	8AM	10PM	8AM	10PM
2	8:30	1							
2	8:30	2							
2	8:30	3							
7	8:30	4							
		5							
	8:30	6							
		7							
2	8:30	8							
7	8:30	9							
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2	8:30	11							
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A.S.L. ...
L.A.M.I. ...

سال 21 - شہر حاضری مارٹر سہ ماہی فی ایس اے نواز بابت ماہ فروری سال 2021

(13)

اسیران خان	فرزانہ حسن	سگنہ
جوگملا	PST	PST

اسیران خان	فرزانہ حسن	سگنہ	1
اسیران خان	فرزانہ حسن	سگنہ	2
اسیران خان	فرزانہ حسن	سگنہ	3
اسیران خان	فرزانہ حسن	سگنہ	4
اسیران خان	فرزانہ حسن	سگنہ	5
اسیران خان	فرزانہ حسن	سگنہ	6
اسیران خان	فرزانہ حسن	سگنہ	7
اسیران خان	فرزانہ حسن	سگنہ	8
اسیران خان	فرزانہ حسن	سگنہ	9
اسیران خان	فرزانہ حسن	سگنہ	10
اسیران خان	فرزانہ حسن	سگنہ	11
اسیران خان	فرزانہ حسن	سگنہ	12
اسیران خان	فرزانہ حسن	سگنہ	13
اسیران خان	فرزانہ حسن	سگنہ	14
اسیران خان	فرزانہ حسن	سگنہ	15
اسیران خان	فرزانہ حسن	سگنہ	16
اسیران خان	فرزانہ حسن	سگنہ	17
اسیران خان	فرزانہ حسن	سگنہ	18
اسیران خان	فرزانہ حسن	سگنہ	19
اسیران خان	فرزانہ حسن	سگنہ	20
اسیران خان	فرزانہ حسن	سگنہ	21
اسیران خان	فرزانہ حسن	سگنہ	22
اسیران خان	فرزانہ حسن	سگنہ	23
اسیران خان	فرزانہ حسن	سگنہ	24
اسیران خان	فرزانہ حسن	سگنہ	25
اسیران خان	فرزانہ حسن	سگنہ	26
اسیران خان	فرزانہ حسن	سگنہ	27
اسیران خان	فرزانہ حسن	سگنہ	28
اسیران خان	فرزانہ حسن	سگنہ	29
اسیران خان	فرزانہ حسن	سگنہ	30
اسیران خان	فرزانہ حسن	سگنہ	31

Handwritten notes and signatures in the bottom left corner.

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رجسٹرڈ مدرسہ اسلامیہ جی پی ایس اسر نواز ٹیوب ویلایت ماہ مارچ سال ۱۴۰۳ھ

شمارہ	وقت	جوگہ اول	جوگہ دوم	مرکز	شمارہ	وقت	جوگہ اول	جوگہ دوم	مرکز
		اسراخان	اسراخان	PST					PST
1		8 AM	10 PM	8:30	1		8:30	10:30	8:30
2		8 AM	10 PM	8:30	2		8:30	10:30	8:30
3		8 AM	10 PM	8:30	3		8:30	10:30	8:30
4		8 AM	10 PM	8:30	4		8:30	10:30	8:30
5		8 AM	10 PM	8:30	5		8:30	10:30	8:30
6		8 AM	10 PM	8:30	6		8:30	10:30	8:30
7		8 AM	10 PM	8:30	7		8:30	10:30	8:30
8	7:30	8 AM	10 PM	8:30	8		8:30	10:30	8:30
9	7:30	8 AM	10 PM	8:30	9		8:30	10:30	8:30
10	7:30	8 AM	10 PM	8:30	10		8:30	10:30	8:30
11	7:30	8 AM	10 PM	8:30	11		8:30	10:30	8:30
12	7:30	8 AM	10 PM	8:30	12		8:30	10:30	8:30
13	7:30	8 AM	10 PM	8:30	13		8:30	10:30	8:30
14	7:30	8 AM	10 PM	8:30	14		8:30	10:30	8:30
15	7:30	8 AM	10 PM	8:30	15		8:30	10:30	8:30
16	7:30	8 AM	10 PM	8:30	16		8:30	10:30	8:30
17	7:30	8 AM	10 PM	8:30	17		8:30	10:30	8:30
18	7:30	8 AM	10 PM	8:30	18		8:30	10:30	8:30
19	7:30	8 AM	10 PM	8:30	19		8:30	10:30	8:30
20	7:30	8 AM	10 PM	8:30	20		8:30	10:30	8:30
21	7:30	8 AM	10 PM	8:30	21		8:30	10:30	8:30
22	7:30	8 AM	10 PM	8:30	22		8:30	10:30	8:30
23	7:30	8 AM	10 PM	8:30	23		8:30	10:30	8:30
24	7:30	8 AM	10 PM	8:30	24		8:30	10:30	8:30
25	7:30	8 AM	10 PM	8:30	25		8:30	10:30	8:30
26	7:30	8 AM	10 PM	8:30	26		8:30	10:30	8:30
27	7:30	8 AM	10 PM	8:30	27		8:30	10:30	8:30
28	7:30	8 AM	10 PM	8:30	28		8:30	10:30	8:30
29	7:30	8 AM	10 PM	8:30	29		8:30	10:30	8:30
30	7:30	8 AM	10 PM	8:30	30		8:30	10:30	8:30
31	7:30	8 AM	10 PM	8:30	31		8:30	10:30	8:30

Office
 20/03
 20/03

A.S.D. (C)
 Lakki Marwat

Distt. Education
 (Female) Lakki Marwat

روز	وقت	امریکا خان		فرزانہ		شانیہ	
		Chokidar		PST-BPS-12		PST.	BPS-12
1							
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15

SUNDAY

SUNDAY

SUNDAY

کون کن لائنوں

Handwritten notes and signatures on the right margin, including 'A.S.D. Lakho' and other illegible text.

Day	Time	Activity	Location	Remarks
1	8:00 AM	Attendance	8:00 AM	
2	8:00 AM	Attendance	8:00 AM	
3	8:00 AM	Attendance	8:00 AM	
4	8:00 AM	Attendance	8:00 AM	
5	8:00 AM	Attendance	8:00 AM	
6	8:00 AM	Attendance	8:00 AM	
7	8:00 AM	Attendance	8:00 AM	
8	8:00 AM	Attendance	8:00 AM	
9	8:00 AM	Attendance	8:00 AM	
10	8:00 AM	Attendance	8:00 AM	
11	8:00 AM	Attendance	8:00 AM	
12	8:00 AM	Attendance	8:00 AM	
13	8:00 AM	Attendance	8:00 AM	
14	8:00 AM	Attendance	8:00 AM	
15	8:00 AM	Attendance	8:00 AM	
16	8:00 AM	Attendance	8:00 AM	
17	8:00 AM	Attendance	8:00 AM	
18	8:00 AM	Attendance	8:00 AM	
19	8:00 AM	Attendance	8:00 AM	
20	8:00 AM	Attendance	8:00 AM	
21	8:00 AM	Attendance	8:00 AM	
22	8:00 AM	Attendance	8:00 AM	
23	8:00 AM	Attendance	8:00 AM	
24	8:00 AM	Attendance	8:00 AM	
25	8:00 AM	Attendance	8:00 AM	
26	8:00 AM	Attendance	8:00 AM	
27	8:00 AM	Attendance	8:00 AM	
28	8:00 AM	Attendance	8:00 AM	
29	8:00 AM	Attendance	8:00 AM	
30	8:00 AM	Attendance	8:00 AM	
31	8:00 AM	Attendance	8:00 AM	

Corona
Vaccination

Choidalag
PST
PST

0333342 033342 033342 033342 033342

Amir Nawaz Mon, Sand Khel
Lakki Marwat
Tajom (حصہ دوم)

پاکستان

E (18)

رپورٹ کی روشنی میں سکول
انتھارٹی نے جو کارروائی کی

رائے / رپورٹ معائنہ

آج مورخہ 2/12/2020 کو گورنمنٹ
گٹری پرائمری سکول ایمر نواز ٹاؤن
کا اچانک وزٹ کیا گیا۔ وزٹ
کے وقت دونوں ٹیچرز فرزانہ حسن
اور شہلاہ حسن موجود تھے۔
SOPS اور شہلاہ حسن کو
Follow up کی گئی ہے۔ اور انہوں
کے پاس گئے ہیں۔ سکول معائنہ
کے لیے PTC کارروائی مکمل ہے۔

2-12-2020
ASD (F)
Lakki

A.S.D.E.U (F)
Lakki Marwat

ATTESTED

رپورٹ کی روشنی میں سکول
تعماری طے جو کارروائی کی

رائے / رپورٹ معائنہ

آج مورخہ 16/10/2021 کو
گورنمنٹ پرائمری سکول امیر نواز نجوری
کا ایجنٹ وزٹ کیا گیا۔ وزٹ
کے وقت دونوں ٹیچرز فرزانہ حسین
اور شگفتہ حس موجود تھیں۔
SOPs کی تازگی کی گئی ہے اور بچوں
کا سائل ٹیکے ہیں۔ سکول صاف
سنگھرا ہے۔ P.T.C. کارروائی مکمل ہے

گورنمنٹ پرائمری سکول

16-01-2021

ASBEDIA

ATTACHED

Q. S. P. S. Kotla Amir Nawaz Moh: 5 and Khel
Tajori (حصہ دوم) لاکھی

20

رپورٹ کی روشنی میں سکول
اتحادی نے جو کارروائی کی

رائے / رپورٹ معائنہ

آنحضور ص 29.05.2021 کو گورنمنٹ سکول
پرنسپل سکول امیر نواز تجوری کا وزٹ کیا۔ وزٹ
کا وقت 11 اور 12 بجے تک تھا۔
سکول صاف ستھرا ہے PTE کارروائی مکمل ہے۔

h U.S. Ban Bani
29.05.2021

ABDO (Name)
Faculty / L.A.H. / M.A.H.

ATTACHED

رپورٹ کی روشنی میں سکول
 انتظامیہ نے جو کارروائی کی

رائے / رپورٹ معائنہ

میں سکول
 انتظامیہ کی

آن صوبہ راجستھان 02-06-2021 کو نوٹیفکیشن گورنر
 برائے سکول امداد گورنر تجویزی کارروائی
 وزارت ہیکل و وزارت کے وقت رولوں
 پیچھے موجود ہیں، مگر فوراً موجود ہیں۔

سکول کی معافی پر موجود ہیں
 S.P.S فالو کرنے کے لیے ایک ریٹیس
 P.T.E کارروائی مکمل ہے۔

تعداد زیادہ ہے، اس لیے اسے
 ضرورت ہے۔

02-06-2021

AS.D.E.O
 Lakki Marwat

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) LAKKI MARWAT
E-mail: frolakki@gmail.com

Date: 04/09/2021 F 22

No. 4327

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

Subject: APPEAL FOR RE-INSTATEMENT

Memorandum

Reference your office letter No. 1037/F.No. 355/Vol-III/Appeal/Lakki dated: 15-07-2021 on the subject cited above and to state that complete report of the subject case is as under:-

1. Mst. Farzana Hassan was transferred to GGPS Akhto Jan Bhetani from GGPS Amir Nawaz Tajori vide this office under Encls: No. 4326-30 Dated: 23-11-2020 in order to functionalize the school, but according to the report received to this office from SDEO (F) Lakki vide its office No. 1192 Dated: 16-03-2021 that the teacher concerned did not take over charge at GGPS Akhto Jan Bhetani after the lapse of one hundred and seventy six (176) days (Copy Attached as annexure-A).
2. Due to non-compliance of her transfer order a show-cause notice served to her vide this office No. 1796-1801 Dated: 18-05-2021 but her reply did not satisfy the undersigned (Reply to show-cause notice is attached as Annexure-B).
3. She was called for personal hearing on 24-06-2021 vide this office letter No. 2124 dated: 19-06-2021 in which questionnaire was served to her but her reply once again did not satisfy the undersigned (Copy of Questionnaire and her reply is attached as Annexure C).
4. She was once again verbally strictly directed in personal hearing to take over charge at GGPS Akhto Jan Bhetani till tomorrow i.e. 25-06-2021 but she paid deaf ear to my words which is highly objectionable and shows negligence/inefficiency at her part.
5. She has stated in departmental appeal at Para No. 1 and 2 that she did not receive show-cause notice regarding "removal from service" while she has submitted reply to the show-cause notice (Reply to show-cause notice is already attached as Annexure-B). Similarly, at Para No. 2 she has stated that she did not receive any letter regarding personal hearing while at Para No. 4 she has stated that she was appeared for personal hearing on 24-06-2021. Hence, it is revealed from her statements she has concealed facts from your good self.

After the lapse of 213 days she did not take over charge at GGPS Akhto Jan Bhetani, so in the view of all these mentioned allegations the undersigned imposed major penalty of "Removal from service" upon Mst. Farzana Hassan under Rule 4-b(iii) of Khyber Pakhtunkhwa Govt. Servant (Efficiency & Discipline) Rules 2011.

Hence, report is submitted for your kind perusal please.

District Education Officer
(Female) Lakki Marwat

چارج رپورٹ

مسماة فرزانه حسن PST آرڈر نمبر 30-4326
23-11-2020

ڈی. ای. او سی میں کمروٹ کے تحت آج

مورثہ 25/6/2021 کو GGPS AKHTO Jan Battani

میں نشیت PST قبل اردو پبلشر چارج سنبھالی

چارج گہنڈہ
P

عطاء اللہ جوگندار
سی پی این افواج ملتان

چارج دہنڈہ

W

HEAD OFFICE
G.G.P.S. No. Jan Battani
Distt. Laakhi Bannwal

Handwritten signature

25/6/21

11201.6/3/301.1

ACCEPTED

گورنمنٹ ٹریڈنگ کالج، کراچی
 امتحان سال 2021

فرزادہ حسرت													
PST													
11201-4458907-8													
0304-0023132 0344-9286208													
روز	آدم	دستخط	روایتی	آدم	دستخط	روایتی	آدم	دستخط	روایتی	آدم	دستخط	روایتی	آدم
1					P			P					
2					P			P					
3					P			P					
4					P			P					
5					P			P					
6					P			P					
7					P			P					
8					P			P					
9					P			P					
10					P			P					
11					P			P					
12					P			P					
13					P			P					
14					P			P					
15					P			P					
16					P			P					
17					P			P					
18					P			P					
19					P			P					
20					P			P					Take over class
21					P			P					as PST order no
22					P			P					4326-30
23					P			P					23-11-2020
24					P			P					
25					P			P					(P) 101-(P) 71-
26					P			P					(P) 101-(P) 71-
27					P			P					(P) 101-(P) 71-
28					P			P					(P) 101-(P) 71-
29					P			P					(P) 101-(P) 71-
30					P			P					(P) 101-(P) 71-
31													

[Signature]

کارروائی اجلاس

I (25)

اجلاس نمبر 1 کل ممبران 07 حاضر ممبران 07

وقت 9:30 مورخہ 25-6-2021 روز جمعہ مقام GGPS Akhto Jan Battani

ایجنڈا

1	سکول میں بچوں کی تعلیمی سرگرمیوں کو بحال کرنا۔
2	
3	
4	
5	

اقدامات	نیلے	ایجنڈا نمبر
	آج مورخہ 25/6/2021 کو جسٹس برک کی رپورٹ میں اجلاس منعقد ہوئی جس میں بچوں کی تعلیمی سرگرمیوں پر زور دیا گیا کہ رپورٹ میں تمام بچیوں میں سے ممبران بچوں کو سکول لانے اور پڑھائی پر متفقہ طور پر فیصلہ کیا گیا اور نئی سرگرمیوں کی تعلیمی سرگرمیوں کی بحالی میں تعاون اور مدد کرنے کی	

P

دستخط جنرل سیکرٹری

دستخط چیئر پرسن صدر 11201-1306064-2

(تمام ممبران کے دستخط ہونگے)

11201-0312149-2 11201-9822184-4 11201-7872110-2201-4744123-6 22101-4164784-0

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شیرین بی بی اصل بی بی سکلیف بی بی نعمت بی بی زرتاج بی بی

6

رجسٹر نمبر ان

96

ردیف	عکس نمبر	تاریخ		عکس نمبر کے نام	پیشہ	تعلیم	جنس	رنگ	نست	مذہب	ادارت و ادارت	رابطہ نمبر	نام شادی کا رجسٹر	نمبر
		شادی	رجسٹر											
	مانی خیل		25/6/2024	سمیرہ			عورت			مہاجر	شیرین بی بی زوجہ مائیس خان	-		1
	مانی خیل		25/6/21	گل نوز ذراہ			=			مہاجر	اصل بی بی زوجہ سخی جان		22101-4164784-5	2
			25/6/2024	اویسیہ			=			مہاجر	شکیلہ بی بی زوجہ رقیب جان		11204-7872218-6	3
			25/6/2024	مروہ			=			مہاجر	نصرت بی بی زوجہ اباس خان		11201-9822184-4	4
			4	لاطمہ			=			مہاجر	آرہ تاجہ بی بی زوجہ عمر خان	03032911 643	11201-0312014-2	5
			6	سفینہ			=			حیدر نیرس	شاکرینہ زوجہ رائی اللہ		11201-1306064-2	6
										سیکٹری	فرزانہ حسن زوجہ رضی اللہ	03436080 931	11201-4458907-8	7

ORIGINAL



OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) LAKKI MARWAT

Ph & Fax: (0969) 538080, Email: deoflakki@gmail.com

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REMOVAL FROM SERVICE:-

1. **Whereas**, Mst: Farzana Hassan PST under transfer to GGPS Akhto Jan Bhattani from GGPS Amir Nawaz Tajori was proceeded against under the Khyber Pakhtunkhwa Government Servants (efficiency and disciplinary) 2011.
2. **And whereas**, you were transferred to GGPS Akhto Jan Bhattani from GGPS Amir Nawaz Tajori vide this office No. 4326-30 dated: 23-11-2020 in order to functionalize the school.
3. **And whereas**, as per report of SDEO (F) Lakki Marwat vide its office letter No. 1192 dated: 16-03-2021 that you did not take over charge at GGPS Akhto Jan Bhattani after the laps of "176" days in the said school till date.
4. **And whereas**, due to non-compliance of your transfer order show cause notice was served to you vide this office No. 1796-1801 dated: 18-05-2021, but your reply did not satisfy the undersigned.
5. **And whereas**, you were called for personal hearing on 24-06-2021 vide this office letter No. 2124 dated: 19-06-2021 in which questionnaire was served to you but your reply once again did not satisfy the undersigned.
6. **And whereas**, you were once again verbally strictly directed in personal hearing to take over charge at GGPS Akhto Jan Bhattani till tomorrow i.e. 25-06-2021 but in vain.

Now, therefore, in exercise of the power conferred to me Khyber Pakhtunkhwa Govt: Servant (Efficiency & Discipline) Rules 2011 under Rule-4-b(iii) the competent authority (District Education Officer (Female) Lakki Marwat is satisfied and pleased to impose the Major Penalty of "Removal from service" with recovery of all dues paid to me without performing the Govt: duty if any, upon Mst: Farzana Hassan PST in the best interest of public service with immediate effect.

Sabira Parveen
District Education Officer
(Female) Lakki Marwat

Endst: No. 2361-67 Dated. 30-06-2021

Copy to the:-

1. Director Elementary & Secondary Education Deptt: Khyber Pakhtunkhwa, Peshawar.
2. SDEO (F) Lakki Marwat with the direction to make necessary entries in her service book immediately.
3. District Monitoring Officer (EMA) Lakki Marwat.
4. District Accounts Officer Lakki Marwat.
5. ASDEO (F) circle concerned.
6. Teacher concerned.
7. Master File.

District Education Officer
(Female) Lakki Marwat

K

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بخدمت جناب ڈائریکٹر صاحب ایلمینٹری اینڈ سیکنڈری ایجوکیشن پشاور

جناب عالی!

عنوان: بحالی (Re-Instatement) PST BPS-12 کی پوسٹ پر

مودبانہ گزارش ہے

- 1- کہ میری ٹرانسفر آرڈر نمبر $\frac{4326-30}{23-11-20}$ GGPS امیر نواز تجوڑی لکی مروت سے GGPS اختوجان بھٹی لکی مروت ہوئی ہے۔ Removal from Service order S No. 2 کی رو سے SDEO (F), DEO (F) کی آفس سے کوئی Letter موصول نہیں ہوئی ہے۔
- 2- ساکنہ کو شوکاز نوٹس بتاریخ 08-05-2021 کی SDEO (F), DEO (F) کی آفس سے کوئی لیٹر موصول نہیں ہوئی۔ صرف Removal from Service آرڈر بدست Husband موصول ہوئی ہے۔ جسکی وجہ سے Removal from Service خلاف قانون ہے۔ اور نہ Personal Hearing بتاریخ 24-05-2021 کے لئے آفیشل لیٹر موصول ہوئی ہے۔
- 3- ساکنہ PST BPS-12 کی پوسٹ پر ہے۔ جو PST کی U/C پالیسی ہے اس لئے BPS-14 اور BPS-15 کی ٹرانسفر ہونی چاہیے تھی۔ ساکنہ کی تجوڑی یونین کونسل پر Appointment Order ہوئی ہے۔ اس لئے تجوڑی یونین کونسل سے سلیمان خیل یونین کونسل ٹرانسفر کرنا خلاف قانون ہے۔
- 4- ساکنہ کی 24-6-2021 کو Personal Hearing ہوئی جس میں DEO صاحبہ نے درخواست کی کہ مختصر Period کیلئے چارج لیں۔ پھر اپنے U/C میں واپس کر دیں گے۔
- 5- ساکنہ کی جس سکول ٹرانسفر ہوئی ہے اس میں 175 طلباء زیر تعلیم ہے۔ دو ٹیچر میں ایک کو ٹرانسفر کرنے سے سکول بہت متاثر ہوتی ہے۔ جیسا کہ طلباء Statment زیر لف ہے۔ ساکنہ کی جس سکول میں ٹرانسفر

ACCEPTED

ہوئی ہے اُس کے شوہر کا چچا زاد بھائیوں کا دشمنیوں اور قتل مقالتے کے معاملے چلے آ رہے ہیں۔ اور سائلہ روزانہ کی ڈیوٹی سرانجام دینے کے لئے اسی علاقے کا راستہ استعمال کرنی ہوگی۔ جس سے میری جان کو خطرہ ہے جیسا کہ ثبوت کے لئے FIR درج ہے۔

6- سائلہ کی ایک شیر خوار بچی آپریشن کے ذریعے پیدا ہوئی ہے جو کہ اکثر بیمار رہتی ہے وہاں پر ڈاکٹر کی کوئی بھی سہولت موجود نہیں ہے۔ اور اتنی دور افتادہ علاقے کو اپنے ساتھ نہیں لے جاسکتی جسکی ثبوت کیلئے حفاظتی ٹیکوں کا کارڈ اور ڈاکٹر کا پرچہ لف ہے۔ سائلہ کی جہاں ٹرانسفر ہوئی ہے وہ تقریباً 60 کلومیٹر پر مشتمل دشوار گزار اور دور افتادہ علاقہ ہے سائلہ کی جہاں ٹرانسفر ہوئی ہے وہاں کوئی لوکل ٹریفک نہیں جاتی۔ روزانہ ڈیوٹی کے لئے 3 ہزار روپے کی ٹیکسی کرنی پڑھتی ہے جو کہ سائلہ کی وساطت سے باہر ہے DEO صاحبہ کو بہت منت و سماجت کی لیکن سننے کو تیار نہ تھی۔

7- سائلہ کی Husband کی سٹی کے ساتھ ایجوکیشن ڈیپارٹمنٹ میں بطور SS خدمات سرانجام دے رہے ہیں اور گھریلو خدمات بھی سائلہ کی وساطت سے سرانجام دے پارہا ہے۔ جو کہ Spous Policy کے تحت سائلہ کی ڈیوٹی اسٹیشن نزدیک سے نزدیک تر ہونی چاہیے تھی۔ محترمہ DEO صاحبہ سے درخواست کی لیکن سننے کو تیار نہ تھی۔

8- اس سکول کے علاقے میں IMU اہلکار صفیہ بی بی بھی قتل کر دی گئی تھی اور میں بھی اس علاقے کی ایسی ہی واقعہ سے خوفزداد ہوں اور ڈیوٹی کے لئے ذہنی طور پر تیار نہیں ہوں لیکن DEO صاحبہ نے کوئی نہ مانی۔

9- سائلہ نے محترمہ DEO صاحبہ کی حکم پر عمل کی اور 25-06-2021 کو چارج لیا لیکن چارج رپورٹ مدرسین، اجلاس کاروائی رپورٹ بروقت آفس کو Communicate نہ ہو سکا اور DEO صاحبہ نے سائلہ کی Removal from Service کر دی۔

10- سائلہ کی Removal from Service کرتے وقت DEO صاحبہ نے جان بوجھ کر

RECEIVED

ASDEO (F), SDEO (F) کی GGPS اختوجان بھٹنی کی وزٹ کئے بغیر Order کروائے ہیں۔ کہ
سائلہ نے چارج لی ہے کہ نہیں۔

11- ASDEO (C) صاحبہ نے کئی مرتبہ محترمہ SDEO صاحبہ کو بذریعہ فون اور پرسنل بھی Inform کیا ہے کہ میں نے سائلہ کی جو ٹرانسفر کے لئے نام دیا ہے وہ میں نے غلطی سے دیا ہے میں نئی آئی ہوں اور علاقے کا وزٹ نہیں کیا تھا۔ GGPS امیر نواز تجوڑی میں تعداد بہت زیادہ ہے اسکو ایک اور ٹیچر کی از حد ضرورت ہے نہ کہ ٹرانسفر کریں اور Visit Report میں اس کی حاضری بھی لگاتی ہے۔ ایک اور ٹیچر کی بھی از حد ضرورت کی ہدایات بھی جاری کر دی ہے۔ جیسا کہ Log Book امیر نواز تجوڑی ثبوت کے لئے زیر لفظ ہے۔

12- جناب سے اپیل ہے کہ وہ DEO صاحبہ کے رپورٹ طلب کر کے Inquiry کی جائے اور سائلہ ایک غریب گھرانے سے ہیں سائلہ کو دوبارہ اپنے سروں پر بحال کی جائے۔ سائلہ افسران بالا کے ضرورت کے مطابق ہر جگہ اپنی ڈیوٹی سرانجام دے گی۔

سائلہ ہمیشہ کے لئے دُعا گو رہے گی۔

مورخہ: 05-07-2021

العارضہ

فرزانہ حسن PST GGPS اختوجان بھٹنی لکی مروت

ATTENDED

بجرت

سروس ٹریڈ سوشل سٹاپ

فرزانه حسن 2 پنجاب
مرزا حسن نام حکمہ کدیم

مورثہ
مقدمہ
دعویٰ
جرم

باعث تحریر آتمکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آج مقام لکشاؤر کیلئے جمہوری خان اہلوک
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی نکل کارروائی کا کمال اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر ممانعت دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عمر ختمی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا ایبل کی برابری
اور منسوخی نیز دائر کرنے ایبل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے نکل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے
اور اس کا ساختہ پر داخنے منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا جد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھنیا کہ مستدر ہے۔

Accepted & Attended
[Signature]

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ہا۔

المرقوم

کے لئے منظور ہے۔

Fazam

مقام

23/8/21 DB

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA
SERVICE TRIBUNAL, PESHAWAR

Service appeal No. 7760/2021

MST: Farzana Hassan

VERSUS

Govt of KPk, ETC

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Index

S/No	Subject	Annexure	Page No
1	Written reply / comments along with affidavit	-----	1-5
2	Copies of SDEO letter No. ¹¹⁹² show cause, Reply to show cause, Letter for Personal Hearing, Questionnaire, Reply, Removal	A & B, C D, E, F, G	6-12
3	Authority letter.		13

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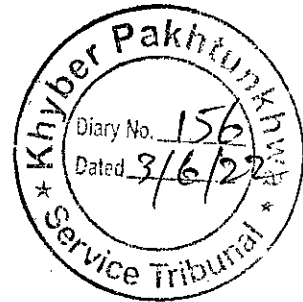
BEFORE THE HON'BLE KHYBER PAKHTOON KHWA
SERVICE TRIBUNAL, PESHAWAR

Service appeal No. 7760/2021

MST: Farzana Hassan

VERSUS

Govt of KPk, ETC



PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth,

The Respondents humbly submits as under:

PRELIMINARY OBJECTIONS:

- i. That the appeal is badly time barred.
- ii. That the appellant has got no locus-standi to file the instant appeal.
- iii. That the appellant has not come to this tribunal with clean hands.
- iv. That the appeal is not maintainable in the present from and also in the present circumstances.
- v. That the appellant has filed the instant appeal just to pressurize the respondents.
- vi. That the appeal is against the facts, rules and laws.
- vii. That the appellant is precluded and estopped from filing the instant appeal due to his own conduct.
- viii. The actual facts of the case are that the appellant being habitual absentee, was transferred to GGPS Akhto Jan Bhattani vide order dated: 23-11-2020 but she never joined her duty and absented from service, the SDEO (F) concerned circle vide its office letter No. 1192 dated: 16-03-2021 reported that the appellant didn't take over charge after laps of more than 176 days, therefore a show cause notice No. 1796-1801 dated: 18-05-2021, was issued to the appellant and in reply to the same the appellant replied but took plea of her family dispute in the area of the posted school to justify her absence from her place of duty. It is pertinent to mention that the appellant didn't mention in her reply of show cause notice, that she performed duty on her previous school, which clearly proved that the claim of performing duty on previous school is afterthought and the appellant never performed duty on previous school, The attendance register and log book are false and fabricated.

Moreover the appellant didn't submit satisfactory reply to show cause, therefore the appellant was personally summoned vide End No.2125-25 dated: 19-06-2021 for personal hearing, to defend the allegations against her. A proper questioner was given to the appellant and she replied to that

(2)

questioner but again she didn't utter a single word about her performing duty on previous school.

That after complete satisfaction about appellant's absence from duty and disobeying the transfer order, the competent authority correctly issued removal from service of appellant. (Copies of S.D.E.O (F) report, show cause notice, reply, letter for personal hearing, questioner, reply to questioner and removal order are Annexure-A, B, C, D, E, F & G)

FACTS:

1. Para No-1. It is submitted that the appellant was appointed in year 2004 but the appellant is habitual absentee from service.
2. Para No-2 is incorrect, the appellant is misrepresenting in said Para. It is evident from the record that the appellant was transferred on 23-11-2020 while the alleged application is actually a reply to show cause notice which was sent to the appellant for clarification of her absent from duty / disobeying the transfer order. The plea of family feud and performance of duty on previous school is after thought because the appellant neither filed any application for cancellation of her transfer nor has filed any appeal till she received the show cause notice. The attendance register and log book are false and fabricated. Moreover the appellant has no authority that she by herself refused to obey the transfer order and perform duty on previous school without applying to the competent authority to do so.
3. Para No-3. It is submitted that on the report of SDEO (F) vide ends No.1192 dated: 16-03-2021, about non-joining duty by the appellant for more than 176 days, the competent authority issued show cause notice to the appellant and the same was replied. Thereafter opportunity of personal hearing was given to the appellant but in all the proceedings the appellant failed to satisfy the competent authority about her failure to take charge in GGPS Akhto Jan. The competent authority correctly issued the appellant's removal from service order dated: 30-06-2021, in accordance with and founding the appellant guilty of misconduct / absent from service. The attendance register, log book etc are false and fabricated.
4. Para No.4. it is submitted that on the complaint of SDEO(F) circle concerned through Report No. 1292 dated: 16-03-2021 about the absent from duty and misconduct of appellant, the competent authority has rightly removed appellant from service due to non-performance of duty and misconduct. Moreover the appellant admitted her absence and non-willingness to join duty on her place of duty i.e GGPS Akhto jan therefore there was no need for further evidence to proceed against appellant. The competent authority has acted in accordance with law, adopted proper procedure, the appellant was personally heard and issued removal order of appellant after due process.

5. The present appeal is filed just to pressurize the department, therefore liable to be dismissed on the following grounds interalia...


GROUND:

- A. That Para No. A is incorrect. The competent authority found the appellant guilty of absent from service, misconduct and misbehaviour, therefore appellant is rightly removed from service.
- B. Para No. B is incorrect. That in respect of appellant's absence proper show cause notice was correctly delivered but the appellant didn't give satisfactory reply. The appellant was given opportunity of personal hearing and correctly removed from service after finding her guilty of misconduct. Moreover the appellant admitted her absence from duty (her new place of duty) therefore no further inquiry was needed for misconduct / absence from duty of appellant. All the legal formalities were fulfilled in the case of appellant and she was removed from service in accordance with law.
- C. Para No. C is incorrect. The appellant was habitual absentee and on the report of SDEO (F) circle, show casue was sent to the appellant, she was personally heard and the competent authority after finding the appellant guilty of misconduct, issued appellant's removal orders in accordance with law and procedure. It is pertinent to mention that when all the evidences are available about misconduct of employee then no inquiry is mandatory and in the case of appellant the misconduct of appellant is apparent from record, therefore no inquiry was needed.
- D. Para D. It is submitted that the appellant was correctly removed from service as she was guilty of misconduct, by disobeying her transfer order and refused to take charge.
- E. Para E That the transfer order of appellant was issued on 23-11-2020 but the appellant never took charge on GGPS Akhto Jan and remained absent. It is pertinent to mention that the appellant neither applied for cancellation of her transfer order nor filed appeal against transfer order. And when the appellant was given show cause notice, then the appellant came with the false and fabricated story about her being performing duty on previous school, to justify her misconduct / disobeying her transfer order. The, appellant was given opportunities to defend allegations but she failed to do so, therefore correctly removed from service.
- F. Para No.F. It is submitted that the appellant was bound to take over charge after receiving transfer order and if there was an actual problem (enmity)


then she must have filed any application or appeal before competent authority for cancellation of transfer order or transfer to any other school but the appellant bluntly refused to obey the transfer order and even didn't bother for cancellation the same transfer order. The appellant never performed duty on her previous school i.e G.G.P.S Amir Nawaz Tajori, the record is fabricated and the plea is afterthought. The appellant is not entitled to any lenient view.

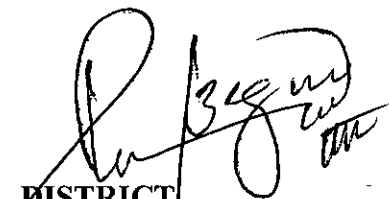
- G. Para No.G is incorrect.. The appellant along with other employees were absent from duties. The appellant is habitual absentee therefore the competent authority after finding the appellant guilty of misconduct had rightly removed her from service.
- H. Para H is incorrect. The appellant admitted that she was personally heard and given every opportunity to justify her misconduct but badly failed to satisfy the competent authority. Therefore correctly removed from service.
- I. That the respondents may be allowed to raise / advance additional ground at the time of arguments.

It is therefore most humbly prayed that this Hon'ble Tribunal may very graciously be pleased to dismiss the instant appeal with cost.


**SECRETARY
 E&SE, KPK,
 PESHAWAR
 RESPONDENTS NO.1**

Dated:21/03/2022


**DIRECTOR E&S
 EDUCATION, KPK,
 PESHAWAR
 RESPONDENTS NO.2**


**DISTRICT
 EDUCATION OFFICER (F)
 LAKKI MARWAT.
 RESPONDENT NO. 3**

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BEFORE THE HON'BLE KHYBER PAKHTOON KHWA
SERVICE TRIBUNAL, PESHAWAR

Service appeal No. 7760/2021

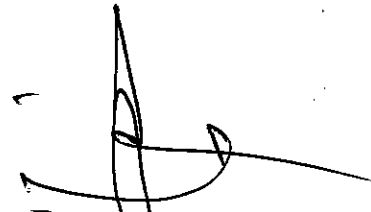
MST: Farzana Hassan

VERSUS

Govt of KPk, ETC

Affidavit

I Muhammad Nazir ADEO authorized by District Education Officer (Female) Lakki Marwat solemnly affirm and declared that the contents of the para wise comments/reply are correct to the best of my knowledge and nothing has been kept concealed intentionally from this Hon'ble Court.


Deponent.



Annex (A)

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OFFICE OF THE SUB-DIVISIONAL EDUCATIONAL OFFICER (FEMALE)
LAKKI MARWAT

No. 1192 /SDEOF/LM
Gmail: sdeoflakki@gmail.com
Phone No. 0969510023

Dated: 16/03/2021
DDO Code: LK: 6007
Whatsapp Group: SDEOFLAKKI

D.A (PST)
19
24/03/21

To

The District Education Office (F)
Lakki Marwat

Subject: **REPORT OF ASDEO FEMALE AGAINST THEIR CIRCLE STAFF**

Memo: As per direction of undersigned and in the light of different complaint received against the staff, the ASDEO (F) of the undersigned Sub-Division reported against the following teachers and staff of their habitual absentee which is

S.No	Circle and ASDEO (F)	Name of School	Name of Official	Types of report	Remarks
1.	Tatter Khel	GGPS W/Jogi	Imam Shah Chowkidar	Will full Absentee	Habitual Absent from duty. Never found on duty since long time
2.	-Do-	GGPS Asghar Khel	Sameen Kifayat PST	-Do-	She has not attended the school since 01 September and strict action required
3.	Tajori	GGPS Sargarah M. Khan	Nazmeena PST BPS-12	Will full absent	Without any application she was absent since 01.03.2021 during the visit of undersigned hence strict action is required please
4.	-Do-	GGPS Akhto Jan Bhattani	Farzana Hassan PST BPS-12	Will full Absent	Failed to compliance, as she has been transferred to GGPS AKhto Jan Bhattani
5.	Landiwah	GGPS Abbasa Wazir	Fehmida Akhtar PST BPS-12	Absent from duty which is his routine	Transferred to GGPS Abasa wazir but did not compliance
6.	-Do-	-Do-	Naheed Akhtar PST BPS-12	Absent From Duty	-Do-
7.	-Do-	GGPS Samandi	Muhammad Younas Chowkidar	-Do-	Always found absent from duty whenever ASDEO (F) visited
8.	-Do-	GGPS Shahab Khel No.2	Ulfat Shaheen PSHT BPS-15	-Do-	Never found
9.	Tajazai	GGPS Kotka Mir Abas	Sardood Khan Chowkidar	Absent From Duty	Habitual absent from duty and never found present in school. Hence strict action is required

It is pertinent to mention that the undersigned has deducted their pay and some pay has been stopped.

Sub-Divisional Education Officer (F)
Lakki Marwat

S.D.E.O (F)
Lakki Marwat
16-03-2021

Date: 16/03/2021
DEO(F) Lakki Marwat

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**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) LAKKI MARWAT**

Ph & Fax: (0969) 530000, Email: deoflakki@gmail.com

SHOW CAUSE NOTICE

Whereas, Mst: Farzana Hassan PST under transfer to GGPS Akhto Jan Bhattani from GGPS Amir Nawaz Tajori is proceeded against under the Khyber Pakhtunkhwa Government servants (efficiency and disciplinary) Rules, 2011 for the charges mentioned below.

And whereas, you were transferred to GGPS Akhto Jan Bhattani from GGPS Amir Nawaz Tajori vide this office Endst: No. 4326-30 dated: 23-11-2020 at S.No.02.

And whereas, as per report of SDEO (F) vide its office letter No. 1192 dated: 16-03-2021 that you did not take over charge after the laps of "176" days in the said school till date.

Now therefore, in exercise of the powers conferred under section 4 of Khyber Pakhtunkhwa Government Servants (efficiency and disciplinary) Rules, 2011, the competent authority (District Education Officer Female Lakki Marwat) is pleased to impose the major penalty of "Removal from Service" upon you.

You thereof, required to show-cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desired to be heard in person.


If no reply to this notice is received within seven days of its delivery, it shall be presumed that you have no defense to put in and in that case, an ex-parte action shall be taken against you under the Khyber Pakhtunkhwa E&D rules, 2011.

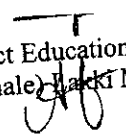
Sabira Parveen
District Education Officer
(Female) Lakki Marwat

Endst. No. 1796-180 Dated. 18/05/2021

Copy to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy District Education Officer (Female) Lakki Marwat.
3. District Monitoring Officer (EMA) Lakki Marwat.
4. SDEO (F) concerned.
5. ASDEO (F) circle concerned.
6. Official concerned.


District Education Officer
(Female) Lakki Marwat

District Education Officer
(Female) Lakki Marwat


بخدمت جنابہ ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) ضلع لکی

جناب عالی!

عنوان: وضاحت شوکار نوٹس نمبر 1801-1796 / 18/05/2021

مؤدبانہ گزارش کی جاتی ہے کہ سالانہ گورنمنٹ پرائمری سکول اختوجان پر PST ڈیوٹی سرانجام دے رہی ہیں اور سالانہ کی گورنمنٹ پرائمری سکول اختوجان میں ٹرانسفر ہوئی ہے۔

سالانہ کی جہاں ٹرانسفر ہوئی ہے وہاں کے لوگوں کے ساتھ ہمارے گھرانے کے 30 سے زیادہ افراد قتل مقتول کے ہمسکے چلے آ رہے ہیں۔ مزید برآں گورنمنٹ پرائمری سکول امیر نواز تجوڑی میں 200 طلباء زیر تعلیم ہیں۔ جو کہ بہت زیادہ ہیں جیسا ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ نے خود معائنہ بھی کیا ہے۔ مزید سالانہ شوگر اور بلڈ پریشر کی مریضہ بھی ہیں اور اتنی دور دراز ڈیوٹی سرانجام دینے سے سالانہ کی بیماری بڑھتی ہے۔

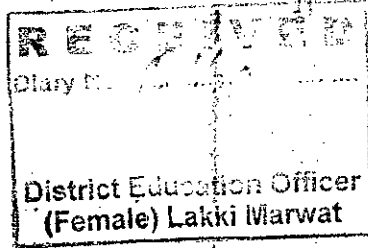
لہذا آپ صاحبان سے گزارش ہے کہ سالانہ کی ٹرانسفر کے احکامات کو کینسل کر کے صادر فرمائیں۔ ہمیشہ کے لئے ڈعا گو رہیں گے۔

العارضہ

موزی 19/05/2021

فرزبانہ حسن PST گورنمنٹ پرائمری سکول امیر نواز تجوڑی ضلع لکی مروت

Fazban



District Education Officer
(Female) Lakki Marwat

D, (9)

(14)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT

No. _____

Dated. 19/06/2021

To

Mst: Farzana Hassan, PST
Under transfer to GGPS Akhto Jan Bhattani

Subject:- PERSONAL HEARING


Memo:-

In response to the show-cause notice issued to you by this office vide No. 1796-1801 dated: 08-05-2021, your reply did not satisfy the undersigned.

Therefore, you are directed to attend the office of the undersigned on 24-06-2021 at 10:00 (am) positively, in connection with personal hearing.

In case of failure, ex parte action will be taken against you under E&D rules 2011.


NOTE:- After due date no excuse/appeal will be accepted.


District Education Officer,
(Female) Lakki Marwat.

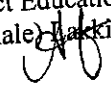
Endst: No: 2125-26 Dated: / /2021

Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. SDEO (F) Lakki Marwat with the direction to inform the above named teacher about personal hearing.


District Education Officer,
(Female) Lakki Marwat.

District Education Officer
(Female) Lakki Marwat



HM

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1 (1) جی ہاں

(2) جی ہاں

(3) معلوم نہیں

(4) جی ہاں ملا ہے جسکا جواب ASDEO فہیل کو جمع کرو

Fazana

24-06-2021

(۱۵)

(۱۵)

(۱۵)

سوالنامہ بنام فرزانہ حسن

- (1) کیا آپ کا نام فرزانہ حسن ہے؟
- (2) دفتر ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) لکی مروت کے بحوالہ مراسلہ نمبر 30-3226 مورخہ 23-11-2020 آپ کے ٹرانسفر آرڈر گورنمنٹ گراؤنڈ پر اٹرنری سکول اختوجان بھٹنی کو ہوئے تھے؟
- (3) کیا مذکورہ بالا ٹرانسفر آرڈر جاری کرتے ہوئے ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) لکی مروت نے خلاف قانون کام کیا ہے، اگر جواب ہاں میں ہے تو وضاحت کریں؟
- (4) کیا آپ کو شوکاژ نوٹس بحوالہ نمبر 1796-1801 مورخہ 08-05-2021 سے ٹرانسفر آرڈر (obey) نہ کرنے کی وجہ سے ملا ہے؟ اگر جواب نہ میں ہے تو وضاحت کریں؟

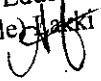


وصول کیا

24-06-2021

Fazana

District Education Officer
(Female) Jalki Marwat



(10) (9) (12)

②

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) LAKKI MARWAT

Ph & Fax: (0969) 538080, Email: deoflakki@gmail.com.

REMOVAL FROM SERVICE:-

1. **Whereas**, Mst: Farzana Hassan PST under transfer to GGPS Akhto Jan Bhattani from GGPS Amir Nawaz Tajori was proceeded against under the Khyber Pakhtunkhwa Government Servants (efficiency and disciplinary) 2011.
2. **And whereas**, you were transferred to GGPS Akhto Jan Bhattani from GGPS Amir Nawaz Tajori vide this office No. 4326-30 dated: 23-11-2020 in order to functionalize the school.
3. **And whereas**, as per report of SDEO (F) Lakki Marwat vide its office letter No. 1192 dated: 16-03-2021 that you did not take over charge at GGPS Akhto Jan Bhattani after the laps of "176" days in the said school till date.
4. **And whereas**, due to non-compliance of your transfer order show cause notice was served to you vide this office No. 1796-1801 dated: 18-05-2021, but your reply did not satisfy the undersigned.
5. **And whereas**, you were called for personal hearing on 24-06-2021 vide this office letter No. 2124 dated: 19-06-2021 in which questionnaire was served to you but your reply once again did not satisfy the undersigned.
6. **And whereas**, you were once again verbally strictly directed in personal hearing to take over charge at GGPS Akhto Jan Bhattani till tomorrow i.e. 25-06-2021 but in vain.

Now, therefore, in exercise of the power conferred to me Khyber Pakhtunkhwa Govt: Servant (Efficiency & Discipline) Rules 2011 under Rule-4-b(iii) the competent authority (District Education Officer (Female) Lakki Marwat is satisfied and pleased to impose the Major Penalty of "**Removal from service**" with recovery of all dues paid to her without performing the Govt: duty if any, upon Mst: Farzana Hassan PST in the best interest of public service with immediate effect.

Sabira Parveen
District Education Officer
(Female) Lakki Marwat

Endst: No. 2361-67 Dated. 30-06-2021

Copy to the:-

1. Director Elementary & Secondary Education Deptt: Khyber Pakhtunkhwa, Peshawar
2. SDEO (F) Lakki Marwat with the direction to made necessary entries in her record book immediately.
3. District Monitoring Officer (EMA) Lakki Marwat.
4. District Accounts Officer Lakki Marwat.
5. ASDEO (F) circle concerned.
6. Teacher concerned.
7. Master File.

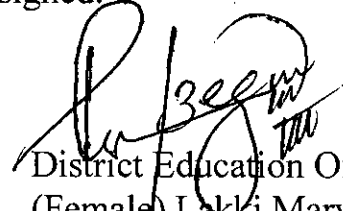
District Education Officer
(Female) Lakki Marwat

11/7/21

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AUTHORITY.

Muhammad Nazir ADEO O/O the District Education Officer(Female) Lakki Marwat is hereby authorized to submit reply in sevice appeal No 7760/2021 Mst: Farzana Hassan VS Govt: Khyber Pakhtunkhwa on behalf of the undersigned.


District Education Officer,
(Female) Lakki Marwat.