

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

Service Appeal No. 747/2020

Date of Institution ... 30.01.2020
Date of Decision ... 18.01.2022

Rabia Khatoon wife of Gul Hameed, Ex-A.T, GGHS, Beerangali,
Abbottabad, Resident of Banda Phagwarian, Tehsil & District
Abbottabad.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary E&SE Khyber
Pakhtunkhwa Peshawar, and three others.

... (Respondents)

Choudhry Abdur Rauf Chohan,
Advocate

... For appellant.

Kabir Ullah Khattak,
Additional Advocate General

... For respondents.

Salah-Ud-Din

...

Member (J)

Rozina Rehman

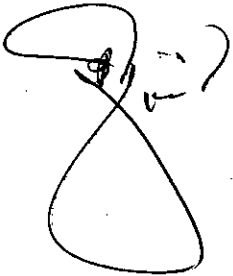
...

Member (J)

JUDGMENT

ROZINA REHMAN, MEMBER (J): The appellant has invoked the
jurisdiction of this Tribunal through above titled appeal with the
prayer as copied below:

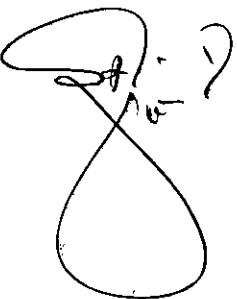
**"It is respectfully prayed before this Honorable
Tribunal that the instant appeal may graciously be
accepted and impugned "Removal from Service
Order" dated 12.11.2012 issued under Endorsement
No.1596, may kindly be set aside and appellant may
graciously be reinstated in service with all back
benefits".**



2. Brief facts of the case are that appellant was appointed as Arabic Teacher. She was promoted from BS-09 to BS-14. During her service while working at GGMS Sheikhu Bandi, she was transferred to GGHS Havelian and thereafter she was transferred time and again and was adjusted in far flung areas of District Abbottabad. It was on 12.11.2012 when respondent No.3 issued order of her removal from service on the allegations of absentia. She submitted departmental appeal which was rejected, hence, the present service appeal.

3. We have heard Choudhry Abdur Rauf Chohan Advocate learned counsel for appellant and Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.

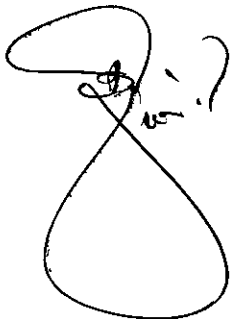
4. Choudhry Abdur Rauf Chohan Advocate learned counsel appearing on behalf of appellant, inter-alia, submitted that the impugned orders are illegal, unlawful and against law and policy as appellant was not treated in accordance with law and canons of natural justice. He contended that the appellant was not given fair trial as enshrined under Article-4 & 25-A of the Constitution of Islamic Republic of Pakistan, 1973 because no regular inquiry was conducted against appellant. It was argued that major penalty cannot be imposed upon any civil servant without conducting regular inquiry in accordance with law and that the appellant was made a rolling stone without any legal justification and was transferred to far flung areas time and again which act of the respondents is clear violation of Article-35 of the Constitution of Islamic Republic of Pakistan, 1973.



Lastly, he submitted that appellant was not provided any opportunity of personal hearing, therefore, the impugned order is against law on the subject and in violation of Rule-9 & 25 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

5. Conversely, learned AAG contended that appellant was transferred from GGHS Sheikhu Bandi to GGHS Mohri Bed Behran but she failed to perform her duty and remained absent. Her concerned Headmistress sent her absence report to the EDO Office, therefore, she was served with a show cause notice. She was then transferred to GGHS Beerangali on humanitarian grounds but her willful absence continued even at the new station. Again a show cause notice was issued and that all the allegations were admitted by the appellant. Lastly, he contended that she was dealt with in accordance with law.

6. Perusal of record would reveal that appellant was appointed as Arabic Teacher (BPS-09) on 19.05.1992. During her service, she was transferred to different areas in District Abbottabad. She remained absent w.e.f 24.11.2008, therefore, she was served with show cause notices dated 11.01.2011 and 12.02.2011. She was finally issued final show cause notice on 09.05.2011 with direction to appear for personal hearing. During hearing, she submitted an affidavit admitting the charges of absence and requesting for adjustment at any station. Accordingly, she was adjusted at GGHS Beerangali, Abbottabad against vacant post on 30.07.2011 and accordingly she assumed charge on 23.08.2011. She was then proceeded against departmentally on the allegations of absentia once again. She was



issued a show cause notice on 01.12.2011. Consequently, she was removed from service w.e.f 24.11.2008 vide order dated 12.11.2012. From the impugned order bearing endorsement No.1596 dated 12.11.2012, it is crystal clear that past transaction in respect of her alleged absence was closed by the authority and she was adjusted at GGHS Berrangali, Abbottabad against vacant A.T post vide office order dated 30.07.2011. The present appellant in compliance with the orders of authority, assumed charge on 23.08.2011 which fact is not disputed. The respondents failed to convince us in this regard as to how the lady appellant was punished w.e.f 24.11.2008 on account of past and closed transaction as she was let off for that period by the authority itself and her proper adjustment order was issued. The impugned order was passed on 12.11.2012 and she filed departmental appeal on 23.11.2012 which is well within time. She submitted different applications and appeals before the authority for the redressal of her grievances and which appeals/applications were properly forwarded which is evident from the record and it was on 09.01.2020 when appeal in respect of the present appellant was filed by the competent authority, therefore, she filed service appeal on 30.01.2020. It has been held by the Apex Court in numerous judgments that the civil servant has the choice either to file appeal immediately on the expiry of ninety days from the date of filing of departmental appeal or wait for the decision upon his departmental appeal. Reliance is placed on 1982 SCMR 582. In the instant case, the appellant opted for the latter which is in consonance with the judgment of the Apex Court. The appeal is, therefore, well within time

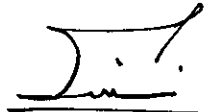


as the appellant was not only proceeded against departmentally on the allegations of absence after her adjustment but also for the past and closed transaction, therefore, the order passed by the authority is not in accordance with law.

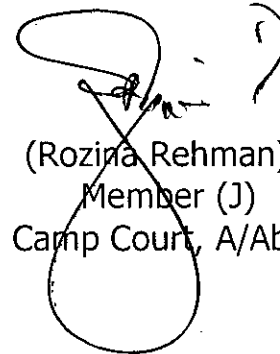
7. In view of the above discussion, the appeal in hand is accepted by setting-aside the impugned order and the appellant stands reinstated in service. The intervening period during which the appellant did not perform her duty shall be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

18.01.2022



(Salah-ud-Din)
Member (J)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad


Order
18.01.2022

Appellant present through counsel.

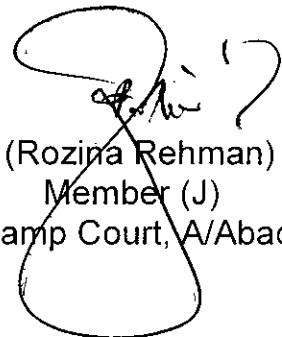
Kabir Ullah Khattak, learned Additional Advocate General alongwith Shuja Ali ADEO for respondents present.

Vide our judgment of today of this Tribunal placed on file, the appeal in hand is accepted by setting-aside the impugned order and the appellant stands reinstated in service. The intervening period during which the appellant did not perform her duty shall be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.
18.01.2022



(Salah-Ud-Din)
Member(J)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

14.06.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 29.09.2021.


Reader

29.09.2021

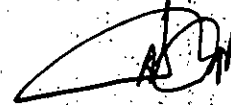
Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG alongwith Zahid Gul, ADEO for the respondents present.

Respondents have furnished reply/comments. Placed on file. Case to come up for arguments on 18.01.2022 before the D.B at Camp Court, Abbottabad.


Chairman
Camp Court, A/Abad

19.01.2021

Due to COVID-19, the case is adjourned for the same on 18.02.2021 before D.B.

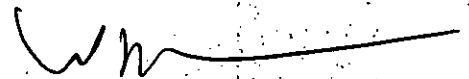

READER

18.02.2021

Counsel for the appellant present.

Noor Zaman Khattak learned District Attorney present.

Written reply/comments not submitted, therefore notice be issued to respondents for submission of reply/comments. To come up for reply/comments on 14.06.2021 before S.B at Camp Court, Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad

23.10.2020

Representative of appellant on behalf of appellant present. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 19.01.2021 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

27/10/20

2020/10/27


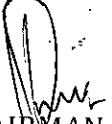
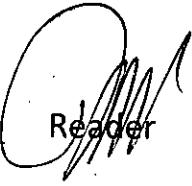


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

FORM OF ORDER SHEET

Court of _____

Case No.- 747 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/01/2020	<p>The appeal of Mst. Rabia Khatoon received today by post may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. decrease</p> <p style="text-align: right;"> REGISTRAR 30/1/2020</p> <p>2-</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>17-04-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to covid ,19 case to come up for the same on / / at camp court abbottabad.</p> <p style="text-align: right;">Reader</p> <p>Due to summer vacation case to come up for the same on <u>23 / 10 / 20</u> at camp court abbottabad.</p> <p style="text-align: right;"> Reader</p>

BEFORE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD.

Service Appeal No. 747 /2020

Rabia Khatoon wife of Gul Hameed, Ex-A.T, GGHS, Beerangali, Abbottabad, Resident of Banda Phagwarian, Tehsil & District, Abbottabad (Cell No.0312-9856202)

....APPELLANT

VERSUS

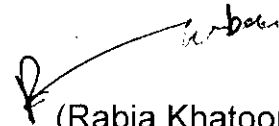
Govt of Khyber Pakhtunkhwa through Secretary E&S Education, Khyber Pakhtunkhwa, Peshawar & 03 Others.RESPONDENTS

SERVICE APPEAL

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4	COPY OF TRANSFER ORDER DATED 30/07/2011	C	10
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Dated: 29/01/2020


(Rabia Khatoon)
(Appellant inperson)

BEFORE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, ,**CAMP COURT ABBOTTABAD.**Khyber Pakhtunkhwa
Service TribunalRegistry No. 918Dated 30/01/2020Service Appeal No. 747/2020

Rabia Khatoon wife of Gul Hameed, Ex-A.T, GGHS, Beerangali,
Abbottabad, Resident of Banda Phagwarian, Tehsil & District, Abbottabad
(Cell No.0312-9856202)

....APPELLANT

VERSUS

1. Govt of Khyber Pakhtunkhwa through Secretary E&S Education,
Khyber Pakhtunkhwa, Peshawar.
2. Director E&S Education, Khyber Pakhtunkhwa, Peshawar.
3. District Co-ordination Officer, Abbottabad (Now Deputy Commissioner,
District, Abbottabad)
4. District Education Officer (Female) E &SE, District, Abbottabad.

....RESPONDENTS

Led to-day

Registrar

30/01/2020

**SERVICE APPEAL UNDER SECTION-4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED "REMOVAL FROM SERVICE" ORDER DATED 12/11/2012
ISSUED BY RESPONDENT NO 3, UNDER ENDORSEMENT NO.1596
WHICH IS TOTALLY ILLEGAL, UNLAWFUL AND AGAINST THE
NATURAL JUSTICE.**

PRAYER:

**IT IS RESPECTFULLY PRAYED BEFORE THIS HONOURABLE
TRIBUNAL THAT THE INSTANT APPEAL MAY GRACIOUSLY, BE**

**ACCEPTED AND IMPUGNED "REMOVAL FROM SERVICE ORDER"
DATED 12/11/2012 ISSUED UNDER ENDORSEMENT NO.1596, MAY
KINDLY BE SET ASIDE AND APPELLANT MAY GRACIOUSLY BE RE-
INSTTED IN SERVICE WITH ALL CONSTITUTIONAL BACK
BENEFITS.**

Respectfully Sheweth:

Facts leading to appeal are as under:-

1. That, the appellant appointed as a Arabic Teacher (BPS-09) at GGMS Bandi Dhondan, District Abbottabad on 19/05/1992, **(Copies of the relevant pages of Service book are annexed as annexure –“A”)**
2. That, Appellant was promoted from BPS-09 to BPS-14 vide office order No.50 dated 27/04/1998 w.e.f. 04/12/1996. **(Copy of order dated 27/04/1998 is annexed as Annexure “B”)**
3. That, the Appellant was working at GGMS, Sheikh-ul-bandi and transferred unlawfully, illegally and under political pressure at GGHS, Havelian Village and after that the appellant was repeatedly transferred from one to another school and finally the appellant was adjusted in a far flung area i.e. GGMS Mohri Badbhn, District, Abbottabad.
4. That, on 30/07/2011, respondent No.3 issued another transfer order of the appellant vide endorsement No.8362-66 and adjusted at GGHS Beerangali, Abbottabad. **(Copy of transfer order dated 30/07/2011 is annexed as Annexure “C”)**
5. That, on 12/11/2012, respondent No.3 issued “Removal From Service Order” of the appellant vide endorsement No. 1596 imposing the charge of

absent from duty. **(Copy of Removal from Service Order dated 12/11/2012 is annexed as Annexure "D")**.

6. That, on 23/11/2012, appellant submitted a Departmental Appeal before respondent No.2 against the impugned Removal from service order. **(Copy of departmental appeal dated 23/11/2012 is annexed as Annexure "E")**
7. That, 13/03/2013, respondent No.2 issued a letter to respondent No.4 for submitting comments upon the said departmental appeal of appellant and respondent No.4 submitted the comments on 03/05/2013. **Copy of comment submitted by respondent No.4 dated 03/05/2013 is annexed as Annexure "F")**
8. That, after submitting the comments by respondent No.4, the final decision upon the appeal of appellant was still pending due to which appellant submitted an application to respondent No.1 for deciding the departmental appeal of appellant upon which respondent No.1; issued a letter to respondent No.2 on 08/04/2019 for deciding the departmental appeal of appellant. **(Copy of letter dated 08/04/2019 by respondent No.1 is annexed as Annexure "G")**
9. That, in the compliance of the letter of respondent No.1 dated 08/04/2019, respondent No.2 issued a letter to respondent 4 on 17/05/2019 to take further necessary action upon the departmental appeal of appellant. **(Copy of letter dated 17/05/2019 by respondent No.2 is annexed as Annexure "H")**
10. That, on 25/07/2019, respondent No.4, submitted the reply of said letter dated 17/05/2019 to respondent No.2 and respondent No.2 rejected the departmental appeal of the appellant on 09/01/2020 vide Endst: No. 1768. **(Copy of rejection order of departmental appeal, dated 09/01/2020 by respondent No.2 is annexed as Annexure "I")**

11. That, the impugned Removal from service order is totally illegal, unlawful and malafide practice and liable to be set-aside on the following grounds:-

GROUNDS:

- A. That, the impugned order is illegal, unlawful and issued against the E&D Rules 2011 of the Govt of Khyber Pakhtunkhwa.
- B. That, the impugned order is liable to be set-aside because no charge sheet / statement of allegation has been issued against the appellant.
- C. That, the impugned order is totally illegal and unlawful because no Regular Inquiry was conducted against the appellant which was necessary because Major penalty can be imposed upon any civil servant without conducting a Regular inquiry according to the Judgment of August Supreme Court of Pakistan.
- D. That, respondents made the appellant only a rolling stone without any legal and lawful justification and transferred the appellant in a far flung area due to which the appellant faced mentally agony and this act of respondents is clear cut violation of Article 35 of the Constitution of Islamic Republic of Pakistan 1973.
- E. That, no show cause notice has been issued against the appellant before issuing the impugned order thus, the impugned order is liable to be set as side.
- F. That no opportunity of Personal Hearing was also provided to the appellant at proper stage before the issuance of impugned order which is totally against the Sec-15 of E&D Rules 2011.
- G. That, respondent did not made any advertisement in any news paper regarding the absent of appellant which is the violation of sec-9 of the E&D Rules 2011 thus, the impugned order is liable to be set aside.

- H. That, instant service appeal well within time because the appellant waited for final decision of his departmental appeal and after the rejection of departmental appeal, appellant is being filed the instant Service Appeal well within stipulated period, before the Hon'ble Service Tribunal.
- I. That, the impugned order was issued only under personal grudges and malafide practice which has no space in the eyes of law and liable to be set aside.
- J. That the other points shall be agitated at the time of arguments with the prior permission of Hon'ble tribunal.

In view of the above facts, grounds and Law, it is respectfully prayed before this Honourable Tribunal that the instant appeal may graciously, be accepted and impugned "Removal from Service order" dated 12/11/2012 issued under endorsement No.1596, may kindly be set aside and appellant may graciously be re-instated in service with all constitutional back benefits.

Dated: 29/01/2020


RABIA KHATOON (Ex-AT)
(APPELLANT IN PERSON)

AFFIDAVIT:

I, Mst. Rabia Khatoon wife of Gul Hameed, Ex-A.T, GGHS, Beerangali, Abbottabad, Resident of Banda Phagwarian, Tehsil & District, Abbottabad, solemnly affirm and declared that contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein.


DEPONENT

A

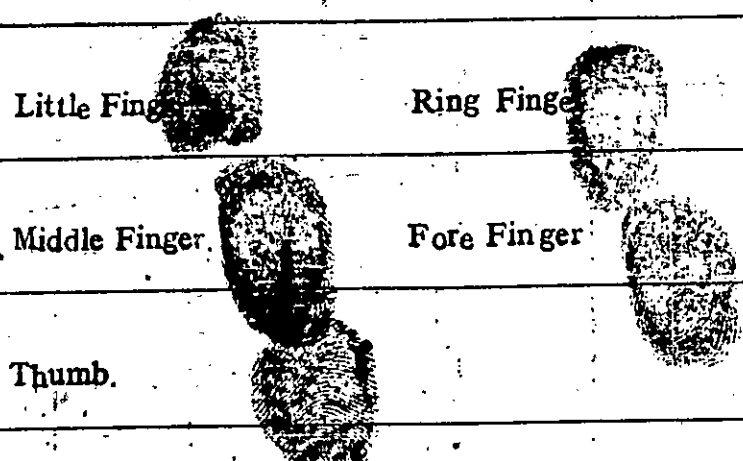
Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

- 1. Name *Mst RABIA KHATOON*
- 2. Race *AWAN*
- 3. Residence *Village: - BANDA PHAGWARIAN. P.O. - PUBLIC SCHOOL ABBOTTABAD. JEHSIL & DISTT. - ABBOTTABAD*
- 4. Father's name and residence *MUHAMMAD ZAMIR ALAM. V. - BANDA PHAGWARIAN. P.O. - PUBLIC SCHOOL ABBOTTABAD. JEHSIL & DISTT. - ABBOTTABAD.*
- 5. Date of birth by Christian era as nearly as can be ascertained *21-6-1968.*

6. Exact height by measurement *5-5*

7. Personal marks for identification *Nil*

8. Left hand thumb and Finger impression of (non-gazetted) officer



9. Signature of Government servant. *Rabia Khatoon*

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

[Signature]
 Sub Divisional Education Officer

[Handwritten mark]

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 if officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 P. y in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
Arabic Teacher G.S.M.S			1185/-	PM (FIXED)			
Bandi Dhundam	off/Temp		1185/-	PM (Fixed)		19.5.92	Rabir Khair
			1185/-			1.12.92	Rabir Khair
G.S.M.S.			1185/-			6/93	Rabir Khair
Bandi Dhundam			1185/-			12/93	Rabir Khair
- DO -			1185/-				Rabir Khair
Revised Pay scales w.e.f. 1-6-94 (1605-97-3060)							
- DO -	- DO -		1605/-			6/94	Rabir Khair
- DO -			1605/-			12/94	Rabir Khair
- DO -			1605/-			12/95	Rabir Khair
- DO -			1605/-			12/96	Rabir Khair
AT S.M.S. Sheikhul Bandi (A.T.D)	Perm:		1605/-	PM		03/97	Rabir Khair
- DO -			1605/-	PM		01/97	Rabir Khair

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave or average pay upto four months for which leave salary is debit to another Government		
				Period	Government to which debit		
<i>Pls</i> D.E.O. (F) Abad	30/11/92	Expiry	<i>Pls</i> SDEO (F) A/D.				
<i>Pls</i> D.E.O. (F) A/D R.P.	31/5/93	Transfer of post	<i>Pls</i> SDEO (F) A/D R.P.				Appointed against type of Arabic teacher, C.B. (1981) (Fixed) plus usual allowances vide DDECS, Haz: Div. All in ahead office B. No 3 of 7.5.92 issued under Endat No 7244-91 of 10.5.92.
<i>Pls</i>	30/11/93	Fixed	<i>Pls</i>				
<i>Pls</i>	31/5/94	Revised pay scales.	<i>Pls</i>				
<i>Pls</i>	11/30/94	No. Inc. being entered	<i>Pls</i>				Service verified from and on from 1-4-92 to 30-11-92.
<i>Pls</i>	11/30-95	No. Inc. being un-trained	<i>Pls</i>				
<i>Pls</i>	11/30-96	No. Inc. being un-trained	<i>Pls</i>				from 1-12-92 to 31-5-93
<i>Pls</i>	7/21/97	Transfer to Headmistress, G.H.S. Sandi Dhundia.	<i>Pls</i>				Service verified from Augustana rolls and other records kept in this office from 1-6-93 to 31-5-95.
<i>Pls</i>	30/11/97	Expiry	<i>Pls</i>				Service verified from Augustana rolls and other records kept in this office from 1-4-95 to 2.07.1997.

9

ANNEXURE

OFFICE OF THE HEAD MISTRESS, GOVT: GIRLS HIGH SCHOOL,
SHEIKHUL BANDI, MURREE ROAD, ABBOTTABAD.

B

No. 50 /P.File/G.Pay/B-14. Dated Sh:Bandi the 27-04-98.
To,

The Distt: Education Officer(F)
Secondary Education, Abbottabad.

Subject:- AWARD OF GRADED PAY IN BPS-14.
Memorandum:

Please find enclosed herewith an application alongwith
Service Book & Original D.M.C of Honours in Arabic(Arabic Teacher)
in respect of Miss. Rabia Khatoon, BA, AT of this school, requesting for
the grant of Graded Pay of BPS-14(2065-161-4480) with effect from
04-12-96, for favour of further necessary action and onwards
submission to the quarter concerned.

Encls:- As above.

[Signature]
HEAD MISTRESS,
GOVT: GIRLS HIGH SCHOOL,
SHEIKHUL BANDI (A'ABAD).
Govt. Girls High School,
Sheikhul Bandi, Murree Road, Abbottabad.

ATTACHED
[Signature]

10

ANNEXURE

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & SE) ABBOTTABAD

ADJUSTMENT ORDER

As approved by the competent authority Mst: Rabia Khatoon, AT GGHS Havelian under transfer to GGMS Mohri Bed Bhen Abbottabad (Surplus) is hereby adjusted on her own pay and grade at GGHS Beerangali Abbottabad against vacant AT post in the interest of public service with effect from the date of her taking over charge on the following terms and conditions:-

TERMS & CONDITIONS

1. She is adjusted at GGHS Beerangali for a probationary period of three months.
2. Her intervening period i.e. 24.11.2008 to the date of her taking over charge at GGHS Beerangali Abbottabad will be decided later on.
3. If she failed to perform her duty at the school as quite satisfactory then her services will be terminated/removed according to her own statement/affidavit/under taking provided by her on the Judicial/Stamp paper worth Rs.500/- dated 23.5.2011 & received in this office on 31.5.2011.
4. Necessary entry to this effect should be made in her service book.
5. Her two annual increments are hereby stopped with cumulative effect for five years.

Sd/-
(SAHIBZADA HAMID MEHMUD)
EXECUTIVE DISTRICT OFFICER
(E & SE) ABBOTTABAD

Endst: No. 8362-66 /EB-III/Trans:AT/TT/Qaria Dated 30/7/2011

Copy forwarded for information and further necessary action to the:-

1. District Accounts Officer Abbottabad.
2. ADO Account Local Office.
- 3-4 Head Mistress GGHS Havelian/GGMS M.B. Bhen Abbottabad.
- 5 Headmistress GGHS Beerangali Abbottabad with the request to check her performance on daily basis and report to the under signed.
6. Teacher concerned/Office record.

A. J. Khan
DISTRICT OFFICER (F/S)
E&SE ABBOTTABAD

ATTESTED
R

PARMI PHOLCRAN

James ONST

OFFICE OF THE DISTRICT COORDINATION OFFICER ABBOTTABAD

(H)

REMOVAL FROM SERVICE:

ANNEXURE

D

1. Whereas Mst: Rabia Khatoon Ex- AT GGMS Mohri Bed Bhen remained absent from duty w.e.f 24-11-2008.
2. Whereas this office served you 02 Show Cause Notices at your home address and also published in newspaper directing you to submit reply of the absence vide this office No. 303 Dated 11-01-2011 and No. 1598 Dated 12-02-2011 respectively.
3. Whereas you were finally issued notice through letter No. 5615 dated 09-05-2011 with the direction to appear before the competent authority for personal hearing. During the hearing you submitted an affidavit/undertaking on judicial paper duly attested admitting the charges of absence leveled against you and you also requested for adjustment at any station against vacant AT post.
4. Whereas by accepting your request you were adjusted at GGHS Beerin Gali, Abbottabad against vacant AT post vide this office order No. 8362-66 dated 30-07-2011 containing the conditions which has been accepted by you and you also took over charge on 23-08-2011 at 10:45 A.M and left the station on same date at 12:00 Noon. Since then the said date i.e 23-08-2011 you did not attended the school and remained yourself absent from duty without application/permission either to HM or this office.
5. Whereas, the competent authority served you a final Show Cause Notice vide this office No. 12333 dated 01-12-2011 but you have given no response and you have willfully been absent from your duty w.e.f 24-11-2008.
6. Whereas the competent authority under the Khyber Pakhtunkhwa Removal from Service Rules 2011 read with Rules 8A of the Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 1973 has been pleased to order the "Removal from service" of Mst: Rabia Khatoon w.e.f 24-11-2008.

Syed Imtiaz Hussain Shah
DISTRICT COORDINATION OFFICER
ABBOTTABAD

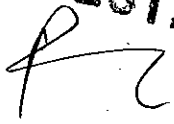
ENDST No. 1596 & Dated 12/11/2012

Copy forwarded to the:

1. Secretary to Govt of KP, E&SE Deptt Peshawar.
2. District Comptroller of Accounts, Abbottabad.
3. District Officer(F) E&SE Abbottabad.
4. ADO Estab(F) Secy, E&SE Abbottabad.
5. HM GGHS Beerin Gali and GGMS Mohri Bed Bhen.
6. Mst: Rabia Khatoon Ex AT GGMS Mohri Bed Bhen under adjustment GGHS Beerin Gali.
7. Office file.


DISTRICT COORDINATION OFFICER
ABBOTTABAD

ATTESTED



81⁰

13- What is One Unit Act?
One Unit Act was made by Madhav Prasad Malaviya and others in 1950.
According to it all the four provinces of United Provinces and United Provinces and United Provinces and United Provinces were merged into one province along with the other provinces.

making laws in conformity with Directive Principles within five years.

بھنور جناب ڈائریکٹر E & S ایجوکیشن خیبر پختونخواہ پشاور۔

ANNEXURE
E

عنوان: محکمانہ اپیل برخلاف برخاگی ملازمت آرڈر

نمبر 1596 مورخہ 12.11.2012 جاری کردہ DCO ضلع ایبٹ آباد

جناب عالی! موجدات اپیل ذیل ہیں۔

- ۱۔ یہ کہ سالکہ کی تقرری محکمہ تعلیم ضلع ایبٹ آباد میں معلم عربی کی حیثیت سے 19.05.1992 کو ہوئی۔
- ۲۔ یہ کہ سالکہ نے دوران ملازمت دور دراز سکولز میں اپنے فرائض احسن طریقہ کے ساتھ سرانجام دیے۔
- ۳۔ یہ کہ 20 سال کی مدت ملازمت میں سالکہ کو کبھی بھی کسی قریبی سکول میں فرائض سرانجام دینے کا موقع فراہم نہیں کیا گیا۔
- ۴۔ یہ کہ 2009 کے بعد سالکہ کو سیاسی دباؤ کے تحت مزید دور دراز سکولز میں یکے بعد دیگرے تبدیل کیا جاتا رہا۔ اس کے باوجود سالکہ نے اپنے فرائض سرانجام دینے میں کوئی کوتاہی نہیں کی۔
- ۵۔ یہ کہ سالکہ کے شوہر ملازمت کے لئے باہر ملک مقیم تھے اور سالکہ کے چھوٹے چھوٹے بچوں کی دیکھ بھال کرنے والا بھی کوئی نہیں تھا تو سالکہ نے متعدد مرتبہ قریبی سکولز میں خالی پوسٹ پر تبادلہ کے لئے درخواستیں دیں مگر سالکہ کو ذاتیات اور سیاسی دباؤ کے تحت نظر انداز کیا جاتا رہا۔
- ۶۔ یہ کہ سالکہ مسلسل دور دراز سکولز میں فرائض سرانجام دینے کی خاطر سفر کرتی رہی جس کی وجہ سے سالکہ کو ٹائیفائیڈ کی بیماری لاحق ہوئی اور سالکہ نے عارضی طور پر میڈیکل Leave کے لئے درخواستیں دیں مگر محکمہ نے نہ صرف چھٹی کی اجازت دی بلکہ سالکہ کی درخواستیں ہی گم کر دیں۔

ATTESTED

صفیہ

(13)

۷۔ یہ کہ سائلہ کے فرائض سرانجام دینے کے باوجود سائلہ کی تنخواہ مورخہ 28/11/2008 سے بلاوجہ بند کر دی گئی

۸۔ یہ کہ ضلع ایبٹ آباد میں 2011 میں آنے والے EDO کے سامنے سائلہ نے جب اپنے مسائل رکھے تو EDO نے قریبی سکول میں تعیناتی کے لئے Dealing Clerk کو کیس تیار کرنے کے لئے دیا۔ مگر بد قسمتی کہ وہ EDO چھٹی پر چلے گئے اور سائلہ کا ٹرانسفر کیس ردی کی نظر کر دیا گیا۔

۹۔ یہ کہ سائلہ ٹرانسفر آرڈر کے انتظار میں تھی کہ مورخہ 12.11.2012 کو DCO ضلع ایبٹ آباد نے سائلہ کو ملازمت سے برخاستگی کا حکم جاری کر دیا۔

Grounds:-

- i۔ یہ کہ سائلہ کی ملازمت سے برخاستگی سے متعلق کوئی انکوائری عمل میں نہیں لائی گئی۔
- ii۔ یہ کہ DCO نے ملازمت سے برخاستگی کے عمل میں بہت جلد بازی سے کام لیا۔
- iii۔ یہ کہ سائلہ کو ملازمت سے برخاست کرنے سے پہلے کوئی Show Cause نوٹس جاری نہیں کیا گیا۔ جو کہ E & D رولز 2011 کے سرعام خلاف ورزی ہے۔
- iv۔ یہ کہ سائلہ کو کسی بھی مقام پر Personal Hearing کے لئے طلب نہیں کیا گیا۔
- v۔ یہ کہ سائلہ کو نہ تو صفائی کا موقع فراہم کیا گیا اور نہ ہی جرح کی اجازت دی گئی۔
- vi۔ یہ کہ سائلہ کے ملازمت سے برخاستگی آرڈر میں غیر حاضری میں جو تاریخ ظاہر کی گئی ہے وہ ریکارڈ کے خلاف ہے۔

ATTESTED

Prayer:-

a- یہ کہ سائلہ کا ملازمت سے برخاستگی آرڈر نمبر 1596 مورخہ 12.11.2012 کو منسوخ فرماتے ہوئے سائلہ کو ملازمت پر جملہ بقایا جات سمیت بحال کیا جائے۔

b- یہ کہ سائلہ کے ساتھ کی جانے والی نا انصافیوں کے خلاف انصاف پڑنی خود مختار انکوائری کی جائے۔

c- یہ کہ جس وقت تک اپیل ہذا کا فیصلہ نہیں ہوتا اس وقت تک ملازمت سے برخاستگی آرڈر کے خلاف حکم امتناعی جاری کیا جائے۔

المرقوم: 23-11-2012

العارضہ

رابعہ خاتون سابقہ AT گورنمنٹ گریڈ
ہائی سکول بیرنگلی ایبٹ آباد

Rabeha

ATTESTED

R

252

(15)

ANNEXURE

F

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 2091 /EB-III
Dated 3/5 /2013

To

The Director,
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject:

APPEAL.

Memo:

Kindly refer to your letter No.3120/F.No.31/Compliant (Female) dated 13-03-2013 under which the appeal of Mst: Rabia Khatoon terminated AT mistress received for comments.

1. It is submitted that the termination order issued by District Coordination Officer Abbottabad of the above named teacher under Endst: No.1591-97 dated 12-11-2012 explain pros and cons of her absence therefore the same may be admitted as comments from this office please.
2. It is further added that teacher concerned was given considerable period to mend her attitude but she failed to do so, however this office has no objection if she is reinstated by the appellate authority provided that any clause of rule is permitted.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.

[Signature]
30/4/2013

Director Edu

*Strongly recommended for
Sympathetic Consideration*

[Signature]
MUSHTAQ AHMED GHANI
SPECIAL ASSISTANT TO
CHIEF MINISTER FOR HIGHER EDUCATION
KHYBER PAKHTUNKHWA

TESTED
[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
 No. SO(PE)/5-19/Re-Instatement/2019
 Dated Peshawar the 08.04.2019

368 (16) ANNEX-25-22
 9

To:

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

Subject:

APPLICATION FOR ISSUANCE OF DIRECTIONS TO DIRECTOR E&S
 EDUCATION KPK, PESHAWAR FOR TAKING DECISION UPON THE
 DEPARTMENT APPEAL OF THE APPLICANT

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of an application bearing No. 205 dated 03.04.2019 alongwith connected documents in respect of Mst. Rabia Khatoon (Ex-A.P) GGHS Birangli, District Abbottabad, for further necessary action as per rules/policy, please.

Yours Faithfully,

219
 11-5-19

[Signature]

SECTION OFFICER (PRIMARY)

Encl: as above.

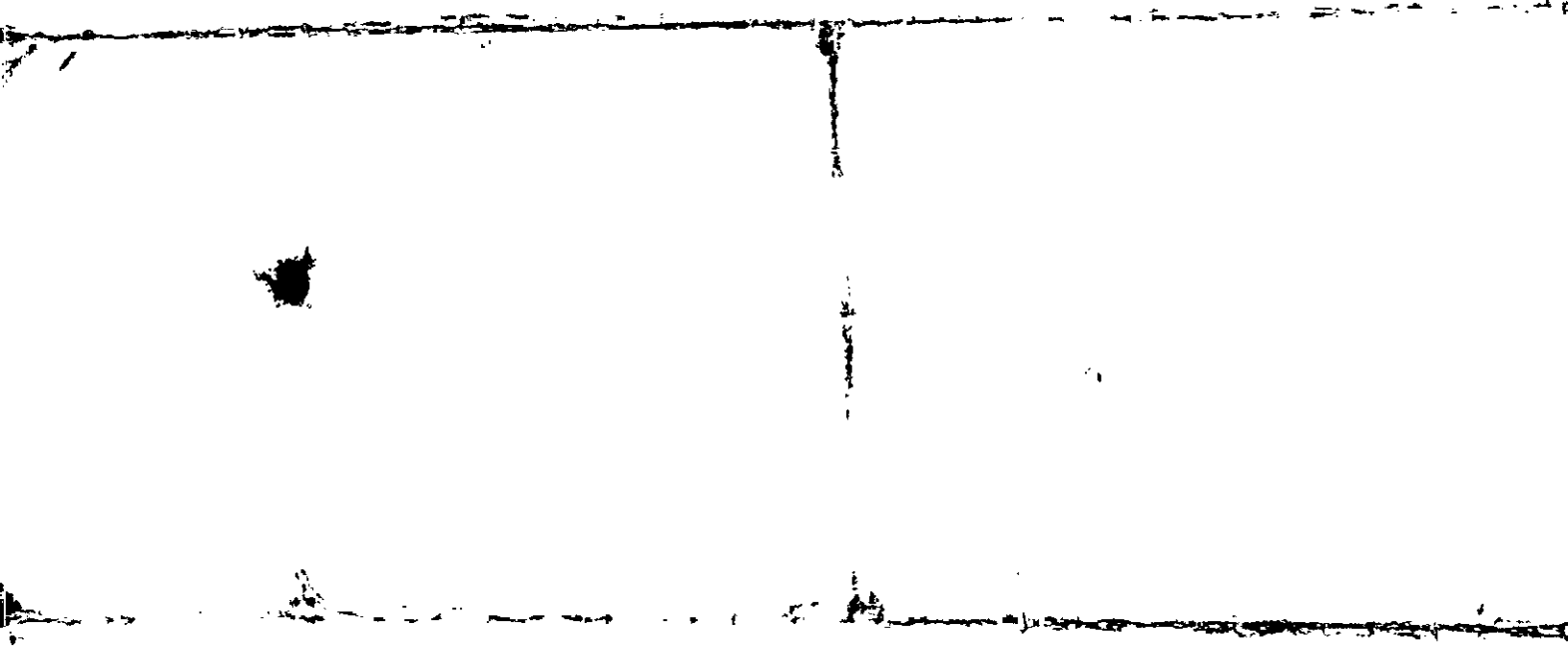
Encl: of even Number & Date:
 Copy to the -

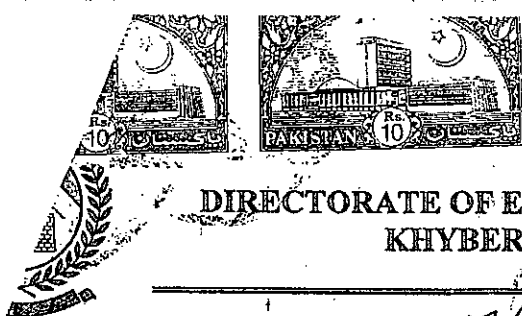
1. The DEO (Female), District Abbottabad, for similar necessary action.
2. PS to Secretary, E&SE Department, Peshawar.

[Handwritten notes and signatures]
 ADD-
 142
 11/4
 9/4

[Signature]

SECTION OFFICER (PRIMARY)





DESPATCHER
Director (E&SE)
KPK Peshawar.

17

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 4761 /F No-362/Vol-II/Appeal Abbottabad
Dated Peshawar the 17/05 /2019

ANNEXURE

H

To

The District Education Officer (Female)
Abbottabad.

Subject:

APPLICATION FOR ISSUANCE OF DIRECTIONS TO DIRECTOR
E&SE KPK PESHAWAR FOR TAKING DECISION UPON THE
DEPARTMENT APPEAL OF THE APPLICANT.

I am directed to refer to the subject cited above and to enclose herewith a copy of letter No.SO (Primary) E&SED Deptt: vide No.SO (PE)/5-19/Re-Instatement/2019 dated 08-04-2019 along with an application bearing No.205 dated 03-04-2019 along with connected documents in respect of Mst: Rabia Khatoun (Ex-AT) GGHS Birangli Abbottabad is forwarded for further necessary action as per rule/policy.

Encls: As Above.

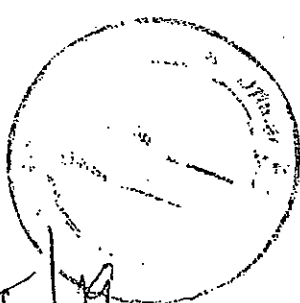
Handwritten signature
Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Endst No. _____

Copy of the above is forwarded to the:

1. Section Officer (Primary) E&SED Khyber Pakhtunkhwa Peshawar w/r to his letter No & dated cited above.
2. PA to Director E&SE KPK Peshawar.

Handwritten notes:
DIA EB TR
out ?
24/5/19



Deputy Director (Female)
E&SE Khyber Pakhtunkhwa



ATTESTED

Handwritten signature



18

ANNEXURE

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 1768 / FNo.362/F/VOI-II/Appeal A.abad

Dated Peshawar the 09-1- /2020

To

The District Education Officer,
(Female) Abbottabad

Subject:- DEPARTMENTAL APPEAL

I am directed to refer to your letter No. 6392 dated 25/07/2019 on the subject cited above and to ask you that appeal in respect of Mst. Rabia Khatoon Ex-AT GGHS Birangali District Abbottabad is hereby seen and file by the competent authority. Hence she may be informed accordingly.

Endst No. _____ /

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Hans
Deputy Director (Female)
E&SE Khyber Pakhtunkhwa,

09/01/2020

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa,

ATTESTED

R

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD.**

APPEAL NO 747-A/2020

MST RABIA KHATOON..... APPELLANT

VS

**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY EDUCATION DEPARTMENT PESHAWAR &
OTHERS.....RESPONDENTS**

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4	Annexure	"E" & "F"	31 - 32
5	Annexure	"G" & "H"	33 - 35
6	Annexure		

Respondents

Dated _____

Through Representative

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD.**

APPEAL NO 747-A/2020

MST RABIA KHATOON... APPELLANT

VS

**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY EDUCATION DEPARTMENT PESHAWAR &
OTHERS.....Respondents**

Para wise comments on behalf of the respondents No 1 to 4.

Respectfully Sheweth:

Para wise comments on behalf of the respondents No 1 to 4 are as under.

PRELIMINARY OBJECTION

1. That the appellant has no locus standi/cause of action to file instant appeal.
2. That the appellant is stopped to agitate the instant matter before this Honorable Tribunal.
3. That the appellant has not approached this Honorable Tribunal with clean hands.
4. That the appellant has filed instant appeal with malafide intention for wrongful gain and suppressing the original facts, from this Honorable Tribunal, hence the appeal is liable to be dismissed.
5. That the appeal is hopelessly time barred.
6. That the appellant is treated as per rules and law and policy. Therefore appellant is not entitled for any relief and hence appeal is liable to be dismissed without further proceeding.
7. That the instant appeal is not maintainable in its present form.
8. That appellant was found irregular/absent in her respective duties in this regard she admits all the alligations which was leveled against her in show cause Notice by affidavit.
9. That the instant appeal is against the law/service rules hence not maintainable in the eye of law and liable to be dismissed.
10. That the appellant has field the present appeal just to pressurize the respondents.
11. The respondent with in law and rules the order dated 12-11-2012 issued after fulfillment of the codal formalities hence appeal is liable to be dismissed.



FACTUAL OBJECTION

1. Para No 1 is correct pertains to record hence no comments.
2. Para No 2 of appeal also pertains to record. No comments.
3. Para No 3 of the appeal pertains to record. It is stated that the appellant was transfer from GGHS Sheikul Bandi to GGHS Mohri Bed Behan, but she failed to perform her respective duties, and remain absent in this regard the concern Head Mistress sent her absent report to the EDO office. The office of the EDO had sent show cause notice or appellant absent. **(Photocopies of absent report and the show cause are annexed as Annexure "A" & "B" respectively).**
4. Para No 4 is correct to the extent that on the account of appellant willful absence, being lady transferred from GGHS Mohri Bed Behn to GGHS Berangali on the humanitarians ground. The attitude of the appellant was same and her willful absence still continued at new station. The concern Headmistress of the GGHS Berangali sent her absent report to the office and give detail report regarding appellant behavior. **(Photocopies of absent reports and the detail are annexed as Annexure "C" & "D" respectively).**
5. Para No 5 is correct to the extent that all the proceeding had taken in accordance with rules and law. The office of the EDO had issued show cause Notice and reply the appellant submit affidavit in which she admitted all the alligations against her in the show cause Notice. **(Photocopies of Show cause Notices and the affidavit are annexed as Annexure "E" & "F" respectively).**
6. Para No 6 of the appeal is correct to the extent that the appellant filed Departmental to the competent authority. The office of the Directorate calls the comments in her Departmental appeal. Office of the EDO submitted reply in this regard that time, on

the basis of reply submitted the Departmental appeal of the appellant was not entertained. (Photocopies of Departmental appeal and the reply of the DEO are annexed as Annexure "G" & "H" respectively).

- above .*
7. Para No 7 is correct detail reply has been given in the Para No 6 ~~of the appeal~~.
 8. Para No 8 of the appeal it is submitted that on the comments on the appeal of the appellant, her Departmental appeal was not entertained that time. Further stated that after laps of 6/7 years, appellant filed application to gain wrongful. The application of the appellant is badly time barred. Hence the instant appeal is liable to be dismissed.
 9. Para No 9 of the appeal is correct to the extent that the appellant filed application to the respondent number 2, to which the respondent wrote to the respondent number 2 and the respondent wrote to the respondent number 4. Furthermore, it is stated that complete answer has already been given against the appellant Departmental appeal. The application is time barred hence liable to be dismissed.
 10. Para 10 of the appeal is correct to the extent that the act of the respondents is in accordance with rules and law.
 11. Para No 11 of the appeal is incorrect. Appellant is not aggrieved. Appellant treated as per rules and law.

GROUNDS

- a. Para of the ground "a" is incorrect, hence denied. Appellant has been treated as per rules.
- b. Para of the ground "b" is incorrect. Denied strongly. As replied above.
- c. Para of the ground "c" is incorrect. Reply has already been given in above factual objection in detail.
- d. Para of the ground "d" is incorrect, hence denied. The appellant has been treated as per rules. Her removal from service was done on account of her willful absence.
- e. Para of the ground "e" is incorrect. Strongly denied. As replied in facts.
- f. Para of the ground "f" incorrect all the proceeding has been done by the authority as per rules and law. The show cause notice was issued and the appellant was submitted her affidavit in which she admits all the allegations leveled in the show cause notice.

- g. Para of the ground "g" is incorrect. The appellant was called, she submit affidavit regarding her acceptance of allegations.
- h. Para of the ground "h" is incorrect. The instant service appeal is time barred hence liable to be dismissed.
- i. Para of the ground "i" is incorrect. Hence denied strongly.
- j. Para of the ground "j" is incorrect, others points will be argued at the time of arguments with the permission of Honorable Tribunal.

It is therefore humbly prayed that in the light of foregoing comments the appeal may graciously be dismissed with cost throughout.

↘

District Education Officer
(Female) Abbottabad.

Deputy Commissioner
Abbottabad.

(Respondent No 4)

(Respondent No 3)

[Signature]
Director (E & SE)

[Signature]
Secretary Education (E & SE)

Khyber Pakhtunkhwa
Peshawar. Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
(Respondent No 2)

Khyber Pakhtunkhwa
Peshawar. **SECRETARY**
Elementary and Secondary Education
Govt of Khyber Pakhtunkhwa
(Respondent No 1)

Through Representative

AFFIDAVIT

Stated on oath that the contents of instant Para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

*Please refer
D A II
[Signature]
4/8/21*

*Vetted
Subject to correction
annexed all relevant
documents along with index.*
[Signature]
Respondent No 3
Deputy District Attorney
Khyber Pakhtunkhwa
Service Tribunal Peshawar
04/03/2021

Annexive - A - 5

گورنمنٹ گریجویٹ اسکول بیرلہی
ایسٹ آباد

(125)

تاریخ 11


تاریخ 17.9.2011
مخدمت ڈسٹرکٹ آفیسر (زبان) قلم لکھنے والے ایسٹ آباد

عنوان: وجہ سے حاضری مدرسین گریجویٹ اسکول بیرلہی ایسٹ آباد ستمبر 2011

حوالہ زبانی آرڈر مورخہ 15/9/2011

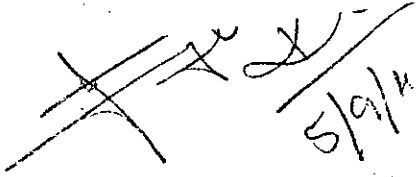
حاضری رجسٹر (فونڈ گائیڈ) گورنمنٹ گریجویٹ اسکول بیرلہی ایسٹ آباد ستمبر 2011
ارسال خدمت سے ملنے والے حوالہ خط نمبر 9740 مورخہ 12.9.2011 تمام لاکھوں کی بجائے
بھیجے اور اسے ارسال خدمت سے ملنے والے حوالہ خط نمبر 9740 سے غائب ہے۔

- (1) فونڈ گائیڈ حاضری ایسٹ آباد
- (2) اصل فونڈ گائیڈ 9740


 NAZIA KHATAN
 Incharge
 Govt. Girls High School
 Sector A, Gali A, Abad.

Honourable Minister for Education
F/S

Recommended for transfer as
i.e.


 5/9/11
 INAYATULLAH KHAN JAFAR
 (ED/Case)
 Accd.

خدمت جناب ای۔ ڈی۔ صاحبہ جو کہ تعلیم اہل بیت آباد

باوساھت! عیدم ڈی۔ او صاحبہ (زناتہ) مدارس اہل بیت آباد

تاریخ 10-08-2011 نمبر 09

عنوان :- ستماہ رابعہ خالون ای۔ ڈی۔ (عامہنری لہورشا)

حوالہ اخطا نمبر 66-8362 مورخہ 30/11/07 عنوان درج بالا مورخہ 09/11/07

دو پیر دستی واپول ہوا۔ نہایت ادب سے گزارش ہو کہ

ستماہ رابعہ خالون ای۔ ڈی۔ اس وقت تک سکول میں حاضر نہیں ہوئی

گورنمنٹ گریجویٹ سکول بیرنگل میں تقریباً 280 بچیاں زیر تعلیم ہیں جن میں

تین استانیان بیڑھاری ہیں۔ کوئی ایس۔ ای۔ ٹی موجود نہیں

سکول کا فلرک عمر 40 دو سال سے سرکاری اشیاء اور ریوارڈ لیکر غائب ہے

بیمار سکول کا کوئی ڈی۔ ڈی۔ او مقرر نہیں۔

take up
inst. the absent
immediately.

سکول میں کوئی ریاضی بیڑھانے والا نہیں

12/8/11

سٹاف کی کمی کی وجہ سے بچیوں کی زندگیاں تباہ ہو رہی ہیں

گائب قلم سے فلرک کی ڈلوٹی کسی بورڈ کے امور یا دیگر ضروری کام لیے جاتی ہیں

4623
13-8-11

لیب اسٹڈنٹ سے بھی چھٹی کلاس کی بیڑھانے والا کیا جا رہا ہے

عمر میں کمی جاتی ہو کر سکول میں سٹاف پورا کیا جائے

شکریہ

ایڈمنسٹریٹو آفیسر گورنمنٹ گریجویٹ سکول

Mandana
darning
assistent
EIB-111
A.S. Khan
23/8/11

7

SI

113

OFFICE OF THE HEADMISTRESS GOVT. GIRLS HIGH SCHOOL RAVELIAN VILLAGE (AID).

No. 416 /
Dated 9/4 /2011

To,
The Executive District Officer (M.S)
Edu: Accotta ad.

Subject:- FRESH A SENT REPORT IN R/O MST: RABIA KHATOON AS.

Re:-

Answering to tell your letter No. 4458E-111/Adj/Trans
Mst; Rabia Khatoon is not AI Mistress of the school concern Mst; Rabia Khatoon
brought her transfer order by herself. EDO Mr Bashir Shah advised me by phonic
order to release Ralave Rabia Khatoon and submitted Ghazala Shaheen's Charge
reports immediately. So I obey that. I contacted her many times by phone and
she refused to sign Miss Ghazala's Charge reports.

Rishi
HEADMISTRESS
GOVT. GIRLS HIGH SCHOOL
RAVELIAN VILLAGE (AID).

SI b

8

KAS

112

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & SE) ABBOTTABAD.

No. 4458 /EB-III/Adj/Tran/
AT/Qaria/7/2007/dated 02/04/2011.

TO

The Head Mistress
GGHS:Havelian Village
Abbottabad.

Subject:- FRESH ABSENT REPORT IN RESPECT OF MST: RABIA KHATOON AT OF YOUR SCHOOL.

Memo:-

You are directed that fresh and comprehensive report regarding Absence of Mst: Rabia Khatoon AT of your school, along with a copy of her attendance register up date may be provided to the undersigned with in 3-days to receipt of this letter, and also intimated to this office that whether the mistress concerned applied for medical leave or any other leave during her absence at any time. Whether you submitted her absent report to the office of the undersigned. Whether your office/ School contacted to her home address at any time that she may be attended the school to handing over the charge to her successor i.e. Mst: Ghazala Shaheer AT.

The matter is most urgent.

N. do

DISTRICT OFFICER (F)
(E & SE) ABBOTTABAD.

26/3/2011

2

9

(109)

No. 411

Dated 22/2/2011

To, The Executive District Officer,
(E&S) Edu; Abbottabad.

ABSENT FROM DUTY REPORT IN R/O Mst: RABIA KHATOON AT.

Subject:-

Memo:-

It is stated that Mst; Rabia Khatoon AT had been absent throughout long period during her absence she was transferred to Mohri and BHEN on 26.11.2008. She has not submitted any medical certificate /application during her stay in GCHS Havelian Village. She had bring transfer order by itself on 25.11.2008, because Mst; Ghazala Shaheen AT had taken over charge on 26.11.2008 (P.N) photo copies of all letters are attached for necessary action please.

R. l.
HEADMISTRESS
GOVT: GIRLS HIGH SCHOOL
HAVELIAN VILLAGE (ATD).
Headmistress
Govt. Girls High School
Havelian Village (ATD)

گورنمنٹ گرلز ہائی سکول بیرنگلی

ایسٹ آباد

03.11.2011

تاریخ:-

نمبر:- 14

خدمت ڈسٹرکٹ آفسیر (زنانہ) محکمہ تعلیم ضلع ایسٹ آباد

عنوان:- رجسٹرڈ حاضری عدد میں گرلز ہائی سکول بیرنگلی بابت ماہ اکتوبر 2011

کوآلہ زبان آڈر مورفہ 02-11-2011

حاضری رجسٹر (فوڈ کاپی) گورنمنٹ گرلز ہائی سکول بیرنگلی ماہ اکتوبر 2011 ارسال خدمت ہے۔ علاوہ ازیں مس رابعہ خاتون (AT) یکم اگست 2011ء یعنی آرڈر ہونے کے دن سے تاحال 02-11-2011 تک غیہ حاضر ہیں۔ ان کی غیہ حاضری رپورٹ اس سے پہلے 17-09-11 کو بھی ارسال کی تھی۔

NO. 03
 11/11
 Government of Punjab
 Department of Education

Received by
 Cleaning Assistant
 Aes
 3/11/2011

Received
 Aes
 3/11/2011

10

گورنمنٹ گریجویٹ سکول بہار ننگل

بابت ماہ ستمبر

روز	وقت	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ
Eid Holidays								
Sunday								
Z.F	1:20	Z.F	7:30	R.A	1:30	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:30	R.A	7:30	
Z.F	11:30	Z.F	7:30	R.A	11:30	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	11:30	R.A	7:30	
SUNDAY								
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	11:20	Z.F	7:30	R.A	11:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
SUNDAY								
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	11:20	Z.F	7:30	C. leave				
Z.F	1:20	Z.F	7:30					
SUNDAY								
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	1:20	Z.F	7:30	R.A	1:20	R.A	7:30	
Z.F	11:30	Z.F	7:30	R.A	11:30	R.A	7:30	

روز	وقت	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ
8	5	X	7	5	2		
X	X	X	X	X	X		
X	X	X	X	X	X		
5	5		7	5	2		

گورنمنٹ گریجویٹ سکول بہار ننگل

بابت ماہ ستمبر

روز	وقت	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ
Eid Holidays								
Sunday								
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	11:20	A.S	7:30	A.R	11:20	A.R	7:30	
A.S	11:30	A.S	7:30	A.R	11:30	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
SUNDAY								
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	11:20	A.S	7:30	A.R	11:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
SUNDAY								
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	11:20	A.S	7:30	A.R	11:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
SUNDAY								
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	1:20	A.S	7:30	A.R	1:20	A.R	7:30	
A.S	11:20	A.S	7:30	A.R	11:20	A.R	7:30	

روز	وقت	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ	مدرسہ
1	1	X	8	8	X		
X	X	X	X	X	X		
X	X	X	X	X	X		
1	X	X	8	X	X		

روزگار حاضری مدرستین گورنمنٹ گریز جوائی سکول "بیرنگلی" ۲۰۱۱

بابت ماہ اکتوبر ۲۰۱۱

ردیف	شکستہ پور شہر			کوئٹہ جوائی			پارک پور			مجموعی
	دوشنبہ	سہ روز	جمعہ	دوشنبہ	سہ روز	جمعہ	دوشنبہ	سہ روز	جمعہ	
1	S.K 1:30	S.K 7:45	N.R	*	*	*	N.R	1:30	7:45	*
2	S.K 1:30	S.K 7:45	Sunday	Sunday			*	*	*	
3	S.K 1:30	S.K 7:45	N.R	1:30	N.R	7:45	N.R	1:30	N.R	7:45
4	S.K 1:30	S.K 7:45	N.R	1:30	N.R	7:45	N.R	1:30	N.R	7:45
5	S.K 1:30	S.K 7:45	N.R	1:30	N.R	7:45	N.R	1:30	N.R	7:45
6	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
7	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
8	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
9	S.K 1:30	S.K 7:45	Sunday	Sunday			*	*	*	
10	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
11	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
12	S.K 1:30	S.K 7:45	on duty	on duty	N.R	1:30	N.R	7:45	N.R	7:45
13	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
14	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
15	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
16	S.K 1:30	S.K 7:45	Sunday	Sunday			*	*	*	
17	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
18	S.K 1:30	S.K 7:45	on duty	on duty	N.R	1:30	N.R	7:45	N.R	7:45
19	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
20	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
21	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
22	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
23	S.K 1:30	S.K 7:45	Sunday	Sunday			*	*	*	
24	S.K 1:30	S.K 7:45	N.R	N.R	7:45	N.R	N.R	7:45	N.R	7:45
25	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
26	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
27	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
28	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
29	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45
30	S.K 1:30	S.K 7:45	Sunday	Sunday			*	*	*	
31	S.K 1:30	S.K 7:45	K.A 1:30	K.A 7:45	N.R	1:30	N.R	7:45	N.R	7:45

روزگار حاضری مدرستین گورنمنٹ گریز جوائی سکول "بیرنگلی" ۲۰۱۱

بابت ماہ اکتوبر ۲۰۱۱

ردیف	شکستہ پور شہر			کوئٹہ جوائی			پارک پور			مجموعی
	دوشنبہ	سہ روز	جمعہ	دوشنبہ	سہ روز	جمعہ	دوشنبہ	سہ روز	جمعہ	
1	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
2	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
3	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
4	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
5	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
6	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
7	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
8	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
9	A.R 1:30	A.R 7:45	Sunday	Sunday			*	*	*	
10	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
11	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
12	A.R 1:30	A.R 7:45	R.A	1:30	R.A	7:45				
13	A.R 1:30	A.R 7:45	C. Leave							
14	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
15	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
16	A.R 1:30	A.R 7:45	Sunday	Sunday			*	*	*	
17	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
18	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
19	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
20	A.R 1:30	A.R 7:45	C. Leave							
21	A.R 1:30	A.R 7:45	C. Leave							
22	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
23	A.R 1:30	A.R 7:45	Sunday	Sunday			*	*	*	
24	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
25	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
26	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
27	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
28	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
29	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						
30	A.R 1:30	A.R 7:45	Sunday	Sunday			*	*	*	
31	A.R 1:30	A.R 7:45	R.A 1:30	R.A 7:45						

روزگار	دوشنبہ	سہ روز	جمعہ	دوشنبہ	سہ روز	جمعہ	دوشنبہ	سہ روز	جمعہ	مجموعی
روزگار	8	8	X	10	7	3				
روزگار	X	X	X							
روزگار	X	X	X							

اسماء امین
 ڈی. ایم. پی. سی
 ڈی. ایم. پی. سی
 ڈی. ایم. پی. سی

DATE	TO	FROM	CLASS	CARRIER	STATUS	REMARKS
31						
30						
29						
28						
27						
26						
25	SUNDAY					
24	SUNDAY					
23	SUNDAY					
22	SUNDAY					
21	SUNDAY					
20	SUNDAY					
19	SUNDAY					
18	SUNDAY					
17	SUNDAY					
16	SUNDAY					
15						S.K. 1:20 S.K. 7:30
14						S.K. 1:20 S.K. 7:30
13						S.K. 1:20 S.K. 7:30
12						S.K. 1:20 S.K. 7:30
11	SUNDAY					
10						S.K. 1:20 S.K. 7:30
9						S.K. 1:20 S.K. 7:30
8						S.K. 1:20 S.K. 7:30
7						S.K. 1:20 S.K. 7:30
6						S.K. 1:20 S.K. 7:30
5						S.K. 1:20 S.K. 7:30
4	SUNDAY					
3	SUNDAY					
2	SUNDAY					
1	SUNDAY					

اسماء امین
 ڈی. ایم. پی. سی
 ڈی. ایم. پی. سی
 ڈی. ایم. پی. سی

DATE	TO	FROM	CLASS	CARRIER	STATUS	REMARKS
31						
30						
29						
28						
27						
26						
25						
24						
23						
22						
21						
20						
19						
18						
17						
16						
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14						
13						
12						
11						
10						
9						
8						
7						
6						
5						
4						
3						
2						
1						

رحیمہ حاضر می ڈیڑہ سین گورنمنٹ لائبریری ہائی اسکول - جہلم

بابت ماہ									
فہم شعبہ		چوتھم شعبہ		پنجم شعبہ		ششم شعبہ		سابع شعبہ	
قاریہ		ڈی-ایم		ای-ای		ای-ای		ای-ای	
تاریخ	آمد	دستخط	ادائیگی	آمد	دستخط	ادائیگی	آمد	دستخط	ادائیگی
1	8.20	فوزیہ	2.10	فوزیہ	8.20	فوزیہ			
2	8.20	C. Leave	7.40	فوزیہ	1.40	فوزیہ			
3	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
4	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
5	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
6	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
7	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
8	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
9	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
10	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
11	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
12	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
13	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
14	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
15	7.40	فوزیہ	1.40	فوزیہ	7.40	فوزیہ			
16	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
17	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
18	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
19	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
20	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
21	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
22	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
23	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
24	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
25	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
26	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
27	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
28	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
29	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			
30	8.00	فوزیہ	2.00	فوزیہ	8.00	فوزیہ			

نمبر	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
1	X			X			8	6	2
2									14
3									12
4									2

Girls High School
Haveli Village (Ard.)
29-11-2008

بابت	میزان
1	2.10
2	1.40
3	1.40
4	1.40
5	1.40
6	1.40
7	1.40
8	1.40
9	1.40
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13	1.40
14	1.40
15	1.40
16	2.00
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22	2.00
23	2.00
24	2.00
25	2.00
26	2.00
27	2.00
28	2.00
29	2.00
30	2.00

رجسٹر حاضرین مدرستہ نسواں

۱۹۵۸

تاریخ
 ۱ ۸-۲۰
 ۲ ۷-۴۵
 ۳ ۷-۴۵
 ۴ ۷-۴۵
 ۵ ۷-۴۵
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 ۳۱ ۷-۴۵

نام مسین فوزیہ صاحبہ			مسن ہر دوں جمالہ			مسن رابعہ		
بابت ماہ			التوبہ			۱۹۵۸		
عیدہ جاریہ			۵-۱۰-۱۹۵۸			۱-۱-۱۹۵۹		
تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
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10	9	1	1	X	1	X	5	5	X	18	11	1
10	9	1	1	X	1	X	5	5	X	18	11	1

12	11	10	9	8	7	6	5	4	3	2	1
12	11	10	9	8	7	6	5	4	3	2	1
11	10	9	8	7	6	5	4	3	2	1	
10	9	8	7	6	5	4	3	2	1		
9	8	7	6	5	4	3	2	1			
8	7	6	5	4	3	2	1				
7	6	5	4	3	2	1					
6	5	4	3	2	1						
5	4	3	2	1							
4	3	2	1								
3	2	1									
2	1										
1											

Handwritten notes and signatures at the bottom of the page, including a signature that appears to be 'S. S. S.' and some illegible text.

Recd
Annexure 4B
19
NO 7242 dt: 27/3/2012

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) ABBOTTABAD. Under Encl.

NO 1988 /
DATED 27/3 /2012 Cover

TO

Mst: Rabia Khatoon, Arabic Teacher
W/O Gul Hameed Village Banda Phugwarian,
P/O Public School Abbottabad.

SUBJECT:- DISCIPLINARY PROCEEDING (SHOW CAUSE NOTICE).

Memo:

P-134
I am directed to refer to your reply to the Show Cause Notice received in this office on 09-01-2012 and to inform you to appear in person before the Executive District Officer (E & SE) Abbottabad and undersigned on any working day with in a week time positively.

[Signature]
DISTRICT OFFICER (FEMALE)
ELE: & SEC: EDU: ABBOTTABAD.

پست (۴)

موجودہ حالت میں ایئر ٹیکو ڈسٹرکٹ ایجوکیشن آفیسر ایئر ٹیکو ڈسٹرکٹ ایجوکیشن

عنوان :- شوکاراؤٹی کا جواب ۱۱۱۱۱۱

جنکے علی

تفزیل ہے کہ فروپہ کا آرڈر خود نشیے گزرا جائے گا۔ برتن گلی میں ہوا تھا اور پیر دی اور کمرے
 سے باہر فروپہ نے خود نشیے گزرا جائے گا۔ برتن گلی میں ہوا مورخہ 23.08.2011 کو چارج لیا۔ فزوی
 ہیلے بھی ٹائٹھا ہڈی کے وجہ سے ڈاکٹر نے دیکھنے کا اور لپے سفر سے منع کیا تھا اس سے باہر ہوا ہے۔ پیر
 گلی کا سائلہ نے دیکھنے کے سفر کیا تو پیر شدہ دیکھنے میں مبتلا ہو گئی اور مورخہ 24.8.2011 کو اپنا ہڈی
 چیک لے لیا کروایا تو سائلہ کو شہر کہ جی دیکھنے پکارے گا سائلہ کرنا پڑا اور ڈاکٹر نے طویل اور دیکھنے کا
 سے سختی سے منع کیا سائلہ نے ہڈی سرنٹھیلنے سے کاپی اور درخواست کو لے لیا ہڈی سرنٹھیلنے کو بھیج
 ایسے فروپہ کو پم شوکاراؤٹی ملا ہے تو اس سے جواب ہے ساڈ ڈاکٹر کا سرنٹھیلنے سے منع ہے

کے سے ترائی میں کہ فروپہ کے جہاں دیکھنے کو دیکھنا دیکھنے ہوئے اس پر ہڈی سرنٹھیلنے

شوکاراؤٹی کے جواب میں ۱۱۱۱۱۱۱۱
 شوکاراؤٹی کے جواب میں ۱۱۱۱۱۱۱۱۱
 شوکاراؤٹی کے جواب میں ۱۱۱۱۱۱۱۱۱

شوکاراؤٹی کے جواب میں ۱۱۱۱۱۱۱۱۱
 شوکاراؤٹی کے جواب میں ۱۱۱۱۱۱۱۱۱

Regd (138)

21

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELE: & SEC: EDU: ABBOTTABAD



No. 12333/EB III

Dated: 01/12/2011

→ Mst. Rabia Khatoon Ex AT GGMS Mohri Bed Bhen
Now Adjusted at GGHS Biran Gali Abbottabad resident
of Village Banda Phagwarian Abbottabad.

Subject: DISCIPLINARY ACTION / SHOW CAUSE NOTICE REGARDING ABSENT FROM DUTY

Memo:

I am directed to enclose herewith show cause notice in duplicate for your perusal and further process and to ask you to sign the same as token of receipt and return 2nd copy duly signed to this office for further necessary action.

District Officer (F)
Ele: & Sec: Abbottabad

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22

SHOW CAUSE NOTICE

I Sahibzada Hamid Mehmood Executive District Officer Elementary & Secondary Education Abbottabad as a competent authority under rule 9 of Khyber Pakhtunkhwa Efficiency & Discipline rule 2011, do hereby serve you Mst. Rabia Khatoon Ex AT GGMS Mohri Bed Bhen now adjusted at GGHS Biran Gali Abbottabad as follows: -

1. You were willful and un authorized absent from duty with effect from 24.11.2008.
2. You were served two show cause notices at your home address and also published in newspapers directing you to submit reply of the absence vide this office No. 303/EB III dated 11.01.2011 and No. 1598/EBIII dated 12.02.2011 respectively.
3. Your reply received on 15.02.2011, found unsatisfactory.
4. You were finally issued notice through letter No. 5615 dated 09.05.2011 to appear before the competent authority for personal hearing. During the hearing you submitted an affidavit / undertaking on judicial paper duly attested admitting the charges of absence leveled against you and also requested for adjustment at any station against vacant post of AT.
5. By accepting your request, you were adjusted at GGHS Biran Gali Abbottabad against vacant AT post vide this office order No. 8362-66 dated 30.07.2011 containing the conditions which has been accepted by you and you also took over charge on 23.08.2011 at 10:45 am and left the station on same date at 12:00 (AN). Since then the said date i.e. 23.08.2011 you did not attended the school and remained your self absent from duty without application / permission either to HM or to this office.
6. In excise of powers conferred upon me under rule cited above, the undersigned in the capacity of competent authority is hereby pleased to dispense with the conduct of Formal Enquiry and serve you with the instant show cause notice with the directions to submit your defence in writing with in 15 days of the issue of this notice as to why major plenty of removal from service should not be imposed upon you. There is no need of holding a formal inquiry in this case.
7. In case you failed to submit your reply with in the stipulated period, it will be presumed that you have no defense to offer and an ex parte decision will be taken against you.

Please also intimate whether you desire to be heard in person or not?

Mst. Rabia Khatoon
GGHS Biran Gali Abbottabad


Competent Authority

9/5/11 doc

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23

SHOW CAUSE NOTICE

I Sahihzada Hamid Mehmood Executive District Officer Elementary & Secondary Education Abbottabad as a competent authority under rule 9 of Khyber Pakhtunkhwa Efficiency & Discipline rule 2011, do hereby serve you Mst. Rabia Khatoon Ex AT GGMS Mohri Bed Bhen now adjusted at GGHS Biran Gali Abbottabad as follows: -

1. You were willful and un authorized absent from duty with effect from 24.11.2008.
2. You were served two show cause notices at your home address and also published in newspapers directing you to submit reply of the absence vide this office No. 303/EB III dated 11.01.2011 and No. 1598/EBIII dated 12.02.2011 respectively.
3. Your reply received on 15.02.2011, found unsatisfactory.
4. You were finally issued notice through letter No. 5615 dated 09.05.2011 to appear before the competent authority for personal hearing. During the hearing you submitted an affidavit / undertaking on judicial paper duly attested admitting the charges of absence leveled against you and also requested for adjustment at any station against vacant post of AT.
5. By accepting your request, you were adjusted at GGHS Biran Gali Abbottabad against vacant AT post vide this office order No. 8362-66 dated 30.07.2011 containing the conditions which has been accepted by you and you also took over charge on 23.08.2011 at 10:45 am and left the station on same date at 12:00 (AM). Since then the said date i.e. 23.08.2011 you did not attended the school and remained your self absent from duty without application / permission either to HM or to this office.

6. In exercise of powers conferred upon me under rule cited above, the undersigned in the capacity of competent authority is hereby pleased to dispense with the conduct of Formal Enquiry and serve you with the instant show cause notice with the direction to submit your defence in writing within 15 days of the issue of this notice as to why charge of absence from service should not be imposed upon you. There is no need of holding 'Formal Enquiry' in this case.

7. It is for you to show you right with in the stipulated period. If you fail to do so, the decision will be final.

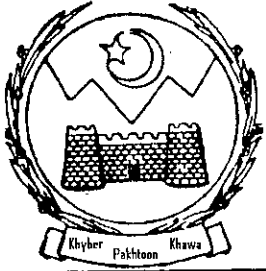
[Faint signature and stamp area]

(133)

24

Regd on their home address

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELE: & SEC: EDU: ABBOTTABAD



No. 12333/EB III
Dated: 01/12/2011

Regd: No. 1045
8-12-2011

GPO
Biran
Gali

Mst. Rabia Khatoon Ex AT GGMS Mohri Bed Bhen
Now Adjusted at GGHS Biran Gali Abbottabad resident
of Village Banda Phagwarian Abbottabad.

Subject: DISCIPLINARY ACTION / SHOW CAUSE NOTICE REGARDING ABSENT FROM DUTY

Memo:

I am directed to enclose herewith show cause notice in duplicate for your perusal and further process and to ask you to sign the same as token of receipt and return 2nd copy duly signed to this office for further necessary action.

A. Khan
District Officer (F)
Ele: & Sec: Abbottabad

(131)

(25)

SHOW CAUSE NOTICE

I Mr. Sahibzada Hamid Mehmood Executive District Officer Elementary & Secondary Education Abbottabad as a competent authority under rule 9 of Khyber Pakhtunkhwa Efficiency & Discipline rule 2011, do hereby serve you Mst. Rabia Khatoon Ex AT GGMS Mohri Bcd Bhen now adjusted at GGHS Biran Gali Abbottabad as follows: -

1. You were willful⁺ authorized absent from duty with effect from 24.11.2008.
2. You were served two show cause notices at your home address and also published in newspapers directing you to submit reply of the absence vide this office No. 303/EB III dated 11.01.2011 and No. 1598/EBIII dated 12.02.2011 respectively.
3. Your reply received on 15.02.2011, found unsatisfactory.
4. You were finally issued notice through letter No. 5615 dated 09.05.2011 to appear before the competent authority for personal hearing. During the hearing you submitted an affidavit / undertaking on judicial paper duly attested admitting the charges of absence leveled against you and also requested for adjustment at any station against vacant post of AT.
5. By accepting your request, you were adjusted at GGHS Biran Gali Abbottabad against vacant AT post vide this office order No. 8362-66 dated 30.07.2011 containing the conditions which has been accepted by you and you also took over charge on 23.08.2011 at 10:45 am and left the station on same date at 12:00 (AN). Since then the said date i.e. 23.08.2011 you did not attended the school and remained your self absent from duty without application / permission either to HM or to this office.
6. In exercise of powers conferred upon me under rule cited above, the undersigned in the capacity of competent authority is hereby pleased to dispense with the conduct of Formal Enquiry and service you with the instant show cause notice with the directions to submit your defence in writing with in 15 days of the issue of this notice as to why major penalty of removal from service should not be imposed upon you. There is no need of holding a formal inquiry in this case.
7. In case you failed to submit your reply with in the stipulated period, it will be presumed that you have no defense to offer and an ex parte decision will be taken against you.

Please also intimate whether you desire to be heard in person or not?

Competent Authority

Mst. Rabia Khatoon
GGHS Biran Gali Abbottabad

S.H.M. (130) (28)

DPA.

bring

Where, as I as competent authority under section/rules 9-Efficiency and discipline rules 2011 hereby served showcause notice upon you Mst: Rabia Khatoon AT on the charges as below:-

1. You were reportedly willfull absence from duty without application/intimation to this office with effect from 24.11.2008.
2. You were ^{served} issued two showcause notices at your home address and ^{also published in} News paper directing you to submit your reply of absence vide this office No.303/EB-III/dated 14.01.2011 & No.1593/EB-III dated 12/02/2011 respectively.
3. Your reply received in this office on 15/02/2011 which found un-satisfactory.
4. You were finally issued letter No.5515 dated 09/05/2011 to appear before the EDO/Competent authority for personal hearing. In response to which You submitted an Affidivate/undertaking on Judicial paper duly attested, in which you accepted the charges of your absence and requested for adjustment atx any vacant post of AT.
5. Based on your request you were adjusted at GGHS: Beerangali Abbottabad vide this office No.8362-66 /EB-III dated 30.07.2011 with the five conditions mentioned in the body of the order, but you failed to implemented the order and remained your-self continually absent from duty with effect from 24.11.2008 to-date.

And where

Therefore it is necessary ^{is} required to be issue final showcause notice for further disciplinary action under rules 4(b)III for removal from service, hence you are directed to appear before the undersigned with in 15-days alongwith reply other wise your services will be terminated from Govt: ^{rest} in which you will be your self responsible.

Supdt:/ADO/DO(F/S)EDO

EW

~~Re Amman~~ (C) B. 28

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & SE) ABBOTTABAD.

No. 1598 /EB-III/

Dated Abbottabad the 12/02/2011.

TO

The Deputy Director
Information Deptt: Abbottabad.

SUBJECT:- PUBLICATION OF ABSENCE NOTICE.

Name:

Kindly refer to the subject noted above and enclosed herewith six copies of absence notice in respect of Mst: Rabia Khatoon AT GGNs: Mohri Bed Bhen Abbottabad for publication in "Daily News paper" including "Daily Aaj" and "Shamal" etc please.

EXECUTIVE DISTRICT OFFICER
(E & SE) ABBOTTABAD.

12/2/2011

نوٹس غیر حاضری (28)

آپ مسماة رابعہ خاتون عربی ٹیچر گورنمنٹ گرلز مڈل سکول مہری بڈ بہن سے مورخہ ۲۰۰۸-۱۱-۲۴ سے مسلسل ڈیوٹی سے بغیر کسی اطلاع کے غیر حاضر ہیں آپ کو بذریعہ نوٹس بحوالہ چھٹی نمبر 303/EB-III/AT مورخہ ۲۰۱۱-۰۱-۱۱ ارسال کیا گیا۔ اس کے باوجود آپ نے کوئی جواب نہ دیا۔

لہذا آپ کو بذریعہ اشتہار ہذا مطلع کیا جاتا ہے کہ آپ پندرہ یوم کے اندر اندر اپنی غیر حاضری کی وجوہات زیر دستخطی کے رد و رد پیش ہو کر بیان کریں۔ بصورت دیگر آپ کے خلاف مروجہ قانون آرڈیننس مجریہ ایکٹ ۲۰۰۰ کے تحت ۳ ذہبی کارروائی عمل میں لائی جا کر آپ کو سروس سے برخاست کر دیا جائے گا۔ جسکی تمام ترمیم داری آپ پر عائد ہوگی۔

مورخہ ۲۰۱۱-۰۲-۰۷

اشتر
ایگزیکٹو ڈسٹرکٹ آفیسر
ایڈمنسٹری و سیکنڈری ایجوکیشن
ضلع ایبٹ آباد

13/02/2011

29

AAAJ, The Largest Circulated Publication of Provi

نظر کی کبیر

قابل ضمانت وارنٹ جاری کرتے ہوئے انسداد دہشت گردی کے لئے کی گئی ہے۔

حسینی مبارک؟ اقتدار خانہ مصر سمیت

تقریباً 30 سال اقتدار کے خاتمے پر مصر میں حسینی نے خرد دار کیا ہے کہ مصر کی امتداد

آج

صفحہ 8

جلد 15 | اوار 13 فروری 2011 | 9 ربیع الثانی 1432 | قیمت 5 روپے | شمارہ 118

پاکستان سکاؤٹ کیڈٹ کالج بٹراں کی سنگین ترقیاتی کاموں کا افتتاح

موجودہ حالات میں کرنی بھی سیاسی جماعت ایسی عوامی مسائل نہیں حل کر سکتی وزراء کی تعداد کم کر کے عوام کی اسنگوں کی ترجمانی کی ہے

پاکستان سکاؤٹ کیڈٹ کالج بٹراں کی سنگین ترقیاتی کاموں کا افتتاح

پاکستان سکاؤٹ کیڈٹ کالج بٹراں کی جماعت بھارتی اور پاکستانی سکاؤٹس کے درمیان میں جاری ہے۔

پاکستان سکاؤٹ کیڈٹ کالج بٹراں کی جماعت بھارتی اور پاکستانی سکاؤٹس کے درمیان میں جاری ہے۔

مرتبہ	نام	تاریخ	مرتبہ	نام	تاریخ
1	محمد علی	12-11-2011	1	محمد علی	12-11-2011
2	محمد علی	12-11-2011	2	محمد علی	12-11-2011
3	محمد علی	12-11-2011	3	محمد علی	12-11-2011

تقریباً 13 مارچ 2011 بروز اتوار کالج بٹراں میں منعقد کیا جائے گا۔

فون نمبر: 0997-550281/550284/550203
ای میل: info@psc.edu.pk

سیکشن 303/EB-III/AT

آپ سماءہ رابعہ خاتون غربی ٹیچر گورنمنٹ گرلز ہائی اسکول مہری بڑ بہن سے مورخہ 24-11-2008 سے مسلسل ڈیوٹی سے بغیر کسی اطلاع کے غیر حاضر ہیں آپ کو بذریعہ نوٹس بحوالہ جیٹھی نمبر 303/EB-III/AT مورخہ 11-01-2011 ارسال کیا گیا اس کے باوجود آپ نے کوئی جواب نہ دیا۔

لہذا آپ کو بذریعہ اشتہار ہذا مطلع کیا جاتا ہے کہ آپ پندرہ یوم کے اندر اندر اپنی غیر حاضری کی وجوہ زبردستی سے متعلق کے رد و رد پیش ہو کر بیان کریں بصورت دیگر آپ کے خلاف مروجہ قانون آرڈیننس مجریہ ایکٹ 2000 کے تحت تادیبی کارروائی عمل میں لائی جا کر آپ کو سزوں سے برخاست کر دیا جائے گا جسکی تمام تر ذمہ دار آپ پر عائد ہوگی

ایگزیکٹو ڈسٹرکٹ آفیسر ایلیمنٹری و سیکنڈری ایجوکیشن ضلع ایبٹ آباد

A Natu Scho Pukht The O 1. 2. 3. 4. Interc. minin enco: indic: apply Febr

19/02/11

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30-8995298

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Regards AD.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & SE) ABBOTTABAD.

No. 303 / EB-III / Trn: Adj / AT
ST/7/2007 dated Atd thell / 01/2011.

TO

Mst: Rabia Khatoon AT
R/O Village Banda Phugwarian
Abbottabad.

Subject:- SHOW CAUSE NOTICE.

Memo: Your ^{intention} ~~intention~~ is invited about this negligency that you are transfered from Havelian village to GGMS: M.B.Bhen Abbottabad in place of Mst: Ghazala Shaheen AT vide this office order issued under Endst: No. 23012-15/EB-III/Tran: AT (F) dated 24.11.2008. But you failed to resume charge at GGMS: M.B.Bhen Abbottabad after alaps of two years. Its means that you are will full absente ^{from} ~~from~~ last two years.

You are called ^{upon} to explain that why ~~should~~ you ^{remain} ~~are~~ absent from your ^{clerk} ~~clerk~~ for about two years without ^{any} ~~any~~ prior information/sanction to the compitent authority. Which is misconduct and violation of the service rules from your side. Your reply should reach to the under signed with in the 7-days to receive of this letter. If you failed to submit your satisfactory reply with in the prescribed period. Than you will be proceeded under effeciency and Discipline (special power) Act (removal from service) 2000. In which you will be dismissed from service, or action imposed upon you by the compitent authority/Enquiry officer.

This will be treated as most urgent.

N.S.D.
DISTRICT OFFICER
(E & SE) (F) ABBOTTABAD.
01/07/2011

4th Notice

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Annexum E

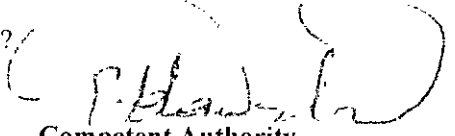
31

SHOW CAUSE NOTICE

I Sahibzada Hamid Mehmood Executive District Officer Elementary & Secondary Education Abbottabad as a competent authority under rule 9 of Khyber Pakhtunkhwa Efficiency & Discipline rule 2011, do hereby serve you Mst. Rabia Khatoon Ex AT GGMS Mohri Bed Bhen now adjusted at GGHS Biran Gali Abbottabad as follows: -

1. You were willful and un authorized absent from duty with effect from 24.11.2008.
2. You were served two show cause notices at your home address and also published in newspapers directing you to submit reply of the absence vide this office No. 303/EB III dated 11.01.2011 and No. 1598/EBIII dated 12.02.2011 respectively.
3. Your reply received on 15.02.2011, found unsatisfactory.
4. You were finally issued notice through letter No. 5615 dated 09.05.2011 to appear before the competent authority for personal hearing. During the hearing you submitted an affidavit / undertaking on judicial paper duly attested admitting the charges of absence leveled against you and also requested for adjustment at any station against vacant post of AT.
5. By accepting your request, you were adjusted at GGHS Biran Gali Abbottabad against vacant AT post vide this office order No. 8362-66 dated 30.07.2011 containing the conditions which has been accepted by you and you also took over charge on 23.08.2011 at 10:45 am and left the station on same date at 12:00 (AN). Since then the said date i.e. 23.08.2011 you did not attend the school and remained your-self absent from duty without application / permission either to HM or to this office.
6. In excise of powers conferred upon me under rule cited above, the undersigned in the capacity of competent authority is hereby pleased to dispense with the conduct of Formal Enquiry and serve you with the instant show cause notice, with the directions to submit your defence in writing with in 15 days of the issue of this notice as to why major plenty of removal from service should not be imposed upon you. There is no need of holding a formal inquiry in this case.
7. In case you failed to submit your reply with in the stipulated period, it will be presumed that you have no defense to offer and an ex-parte decision will be taken against you.

Please also intimate whether you desire to be heard in person or not?


Competent Authority

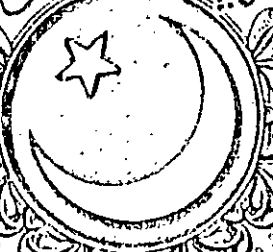
Mst. Rabia Khatoon AT
GGHS Biran Gali Abbottabad

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FIVE HUNDRED RUPEES

پانچ سو (۵۰۰) روپیہ

پاکستان



یک ہفتہ ارب پانچ سو روپیہ

اقرار نامہ

مذکورہ بالا رقم خاتون زوبہ علیہ السلام کے پاس توجہ نامہ پتہ لاہور ڈیپو لاہور سے الگ
کی گئی ہے اور اقرار نامہ اور تصدیق ہوئی:

۱: یہ کہ میں اپنے اوپر لکھے گئے تمام چارجوں کو کھلے دلا سے قبول کرتی ہوں اور اقرار کرتی
کہ یہ سلسلہ ڈھائی سال تک اپنی ڈیوٹی میں جاری رہا ہے اور یہ تصدیق ہے۔

۲: یہ کہ دو سالہ ترقی یافتہ بندر بنی و بنیاریہ ضلع تھانہ پٹیالہ میں من و علیہ السلام
کے پاس آدھے ضلع کی میں کہ عدالت کارخانہ بند کروا گیا اور نہ ہی اس سے
کے نام کا دباؤ دالنے کی کوشش کروائی۔

۳: اگر میں اپنے لئے ملنے والے ضلع اور ضلع کے تعلق سے تو اس سے
جو بھی رقم تھانہ پٹیالہ میں آئی ہے جو تھانہ پٹیالہ میں اور اس کے ضلع کے بھی
کروا گیا اور نہ ہی عدالت کارخانہ بند کروا گیا۔

۴: یہ کہ میں نے اپنے عدالت کارخانہ بند کروا دیا اور اس کے ضلع کے بھی
اور اس کے ضلع کے بھی تھانہ پٹیالہ میں آئی ہے جو تھانہ پٹیالہ میں اور اس کے
کروا گیا اور نہ ہی عدالت کارخانہ بند کروا گیا۔

۵: یہ کہ میں نے اپنے عدالت کارخانہ بند کروا دیا اور اس کے ضلع کے بھی
اور اس کے ضلع کے بھی تھانہ پٹیالہ میں آئی ہے جو تھانہ پٹیالہ میں اور اس کے
کروا گیا اور نہ ہی عدالت کارخانہ بند کروا گیا۔



31/5/2011

۲۳/۵/۲۰۱۱
ایک ارب پانچ سو روپیہ

الحق

31/5/2011

عنوان: محکمہ اپیل برخلاف برخاستگی ملازمت آرڈر

نمبر 1596 مورخہ 12.11.2012 جاری کردہ DCO ضلع ایبٹ آباد

جناب عالی! مہوجبات اپیل ذیل ہیں۔

- ۱۔ یہ کہ سائلہ کی تقرری محکمہ تعلیم ضلع ایبٹ آباد میں معلم عربی کی حیثیت سے 19.05.1992 کو ہوئی۔
- ۲۔ یہ کہ سائلہ نے دوران ملازمت دور دراز سکولز میں اپنے فرائض احسن طریقہ کے ساتھ سرانجام دیے۔
- ۳۔ یہ کہ 20 سال کی مدت ملازمت میں سائلہ کو کبھی بھی کسی قریبی سکول میں فرائض سرانجام دینے کا موقع فراہم نہیں کیا گیا۔
- ۴۔ یہ کہ 2009 کے بعد سائلہ کو سیاسی دباؤ کے تحت مزید دور دراز سکولز میں یکے بعد دیگرے تبدیل کیا جاتا رہا۔ اس کے باوجود سائلہ نے اپنے فرائض سرانجام دینے میں کوئی کوتاہی نہیں کی۔
- ۵۔ یہ کہ سائلہ کے شوہر ملازمت کے لئے باہر ملک مقیم تھے اور سائلہ کے چھوٹے چھوٹے بچوں کی دیکھ بھال کرنے والا بھی کوئی نہیں تھا تو سائلہ نے متعدد مرتبہ قریبی سکولز میں خالی پوسٹ پر تبادلہ کے لئے درخواستیں دیں مگر سائلہ کو ذاتیات اور سیاسی دباؤ کے تحت نظر انداز کیا جاتا رہا۔
- ۶۔ یہ کہ سائلہ مسلسل دور دراز سکولز میں فرائض سرانجام دینے کی خاطر سفر کرتی رہی جس کی وجہ سے سائلہ کو ٹائیفائیڈ کی بیماری لاحق ہوئی اور سائلہ نے عارضی طور پر میڈیکل Leave کے لئے درخواستیں دیں مگر محکمہ نے نہ صرف چھٹی کی اجازت دی بلکہ سائلہ کی درخواستیں ہی گم کر دیں۔

- ۷۔ یہ کہ سائلہ کے فرائض سرانجام دینے کے باوجود سائلہ کی تنخواہ مورخہ 2008 کے لئے
- ۸۔ یہ کہ ضلع ایبٹ آباد میں 2011 میں آنے والے EDO کے سامنے سائلہ نے جب اسے EDO نے قریبی سکول میں تعیناتی کے لئے Dealing Clerk کو کیس تیار کرنے کے لئے EDO چھٹی پر چلے گئے اور سائلہ کا ٹرانسفر کیس روی کی نظر کر دیا گیا۔
- ۹۔ یہ کہ سائلہ ٹرانسفر آرڈر کے انتظار میں تھی کہ مورخہ 12.11.2012 کو DCO ضلع ایبٹ آباد سے ملازمت سے برخاستگی کا حکم جاری کر دیا۔

Grounds:-

- i۔ یہ کہ سائلہ کی ملازمت سے برخاستگی سے متعلق کوئی انکوائری عمل میں نہیں لائی گئی۔
- ii۔ یہ کہ DCO نے ملازمت سے برخاستگی کے عمل میں بہت جلد بازی سے کام لیا۔
- iii۔ یہ کہ سائلہ کو ملازمت سے برخاست کرنے سے پہلے کوئی Show Cause نوٹس جاری نہیں کیا گیا جو کہ E & D رولز 2011 کے سرعام خلاف ورزی ہے۔
- iv۔ یہ کہ سائلہ کو کسی بھی مقام پر Personal Hearing کے لئے طلب نہیں کیا گیا۔
- v۔ یہ کہ سائلہ کو نہ تو صفائی کا موقع فراہم کیا گیا اور نہ ہی جرح کی اجازت دی گئی۔
- vi۔ یہ کہ سائلہ کے ملازمت سے برخاستگی آرڈر میں غیر حاضری میں جو تارتخ ظاہر کی گئی ہے وہ ریکارڈ کے خلاف ہے۔

157 (35)

Prayer:-

a- یہ کہ سائلہ کا ملازمت سے برخاستگی آرڈر نمبر 1596 مورخہ 12.11.2012 کو منسوخ فرماتے ہوئے سائلہ کو ملازمت پر جملہ بقایا جات سمیت بحال کیا جائے۔

b- یہ کہ سائلہ کے ساتھ کی جانے والی نا انصافیوں کے خلاف انصاف پر مبنی خود مختار انکوائری کی جائے۔

c- یہ کہ جس وقت تک اپیل ہذا کا فیصلہ نہیں ہوتا اس وقت تک ملازمت سے برخاستگی آرڈر کے خلاف حکم امتناعی جاری کیا جائے۔

العارضہ

المرقوم:

رابعہ خاتون سابقہ AT گورنمنٹ گرلز
ہائی سکول بیرن گلی ایبٹ آباد

Annex 'H'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

No. 1954 /EB-III

Dated 10-5-2014

36

To

The Deputy Director Female
(E&SE) Khyber Pakhtunkhwa
Peshawar.

Subject:-

PARA WISE REPLY ON APPEAL IN R/O MST; RABIA KHATOON EX-AT GGMS BEERAN
GALI NOW REMOVE FROM SERICE.

Memo:-

Reference departmental appeals in respect of Rabia Khatoon Ex-AT GGMS Beerangali now removed from service received vide your letter No.1118/F.No.21/ (F)/Enquiry dated 18.04.2014.

PARA WISE COMMENTS IS AS UNDER:-

1. It is correct that the appellant was appointed as AT & posted at GGHS Bandi Dhundian vide this office appointment order No.7244-91 dated 10.05.1992. She took over charge on 19.05.1992.
2. She remained posted in the following station/school for the period noted against each.
 - a) GGHS, Bandi Dhundian w.e.f. 19.05.1992 to 02.07.1997
 - b) GGHS, Sheikhubandi w.e.f. 03.07.1997 to 31.12.2004.
 - c) GGHS, Havelian Village w.e.f. 01.01.2005 to 23.11.2008.

The above stations are local & not are situated in for far-flung arrears. Subsequently the appellant willfully remained absent from duty w.e.f. 24.11.2008 to 12.11.2012 i.e. the date of removal from service.

3. It is in correct that she has not been given chance to serve at local stations as the above station mentioned in para 2 are her local station & approachable.
4. It is in correct that the applicant transferred under political pressure. The appellant was transferred to GGMS Mohri Bed Bhen on tenure basis & failed to implement the order.
5. This office has no information that her husband is serving either in abroad are in country. However she has been directed several times to implement the order but she did not do so. She has been given considerable period to mend her attitude but she failed, nether she applied for Earned/Medical leave during her whole absent period. So for as pay of the Govt: Servant is concerned, when the Govt: Servant performs his duties then he entitles for drawl of his pay. Therefore the appellant has not performed duty and has rightly been removed from service.

The matter is submitted please.

DISTRICT EDUCATION OFFIER,
(FEMALE) ABBOTTABAD.

[Signature]
9/5/2014