

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1096/2019

Date of Institution ... 27.08.2019

Date of Decision ... 15.09.2021

MST. Shema Ex-PST GGPS, Jaren Ranolia District Kohistan.

... (Appellant)

VERSUS

The Director Education Elementary & Secondary Education Khyber Pakhtunkhwa
Peshawar and one other. ... (Respondents)

UZMA SYED
Advocate

... For Appellant

KABIRULLAH KHATTAK,
Additional Advocate General

... For Respondents

SALAH-UD-DIN
ATIQ-UR-REHMAN WAZIR

... **MEMBER (JUDICIAL)**
... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):- Brief facts of the case are that the appellant joined education department as Primary School Teacher in the year 2015. During the course of her service, she was proceeded against and was ultimately removed from service vide order dated 20-04-2019. Feeling aggrieved, the appellant filed departmental appeal dated 08-05-2019, which was not responded, hence the instant service appeal instituted on 28-08-2019 with prayers that the impugned order dated 20-04-2019 may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that the impugned order dated 20-04-2019 and not deciding departmental appeal of the appellant within

statutory period of 90 days are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside; that the appellant has been condemned unheard and has not been treated in accordance with law; that the appellant was shown absent during winter vacation and her absence period was shown as 01-01-2019 to 20-04-2019, whereas the winter vacation started from 25-12-2018 to 25-03-2019, which is illegal and based on malafide of the respondents; that no proper inquiry was conducted and if any such proceedings were conducted, the appellant was not associated with such proceedings; that the impugned order was issued without issuance of final showcause notice, which however is a legal right of the appellant. Reliance was placed on 2009 SCMR 605; that the disciplinary proceedings were conducted in violation of Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, as notice through registered mail was not sent on her home address, nor such notice was published in two leading newspapers; that it is by now well settled that regular inquiry is must before imposition of major penalty of removal from service, so that the civil servant is afforded proper opportunity of defense. Reliance was placed on 1987 SCMR 1562.

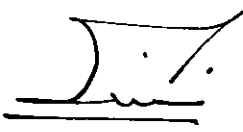
03. Learned Additional Advocate General appearing on behalf of respondents has contended that the appellant was reported willfully absent from her duty by the concerned IMU and other visiting officers; that where the fact of absence from duty was admitted, there was no need for holding of a regular inquiry. Reliance was placed on 2021 PLC (CS) 385; that the appellant was proceeded against under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, by sending a showcause notice at her home address through registered mail, but neither the teacher joined her duty nor submitted convincing reply within the stipulated timeframe; that final showcause notice was also published in two leading newspapers on 26-02-2019 and 27-02-2019, but the appellant never responded to such notices; that the appellant was removed from service after fulfillment of codal


formalities and the impugned order dated 20-04-2019 was issued in accordance with law and rule.

04. We have heard learned counsel for the parties and have perused the record. Record reveals that showcause notice dated 01-02-2019 was issued to the appellant on registered mail on 07-02-2019, but not at her home address, rather such notice was sent on her school address and during the said period, school was already closed due to winter vacation. The newspapers in which such notice was published also cannot be termed as leading newspapers, but these are local newspapers having short range of publication. Most importantly, representative of the respondents also confirmed from his office about the winter holidays and stated at the bar that such holidays were from 25-12-2018 to 25-03-2019, hence it was confirmed beyond any doubt that the appellant was reported absent during winter vacation and was removed from service without properly observing the legal formalities.

05. In view of the foregoing discussion, the instant appeal is accepted and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
15.09.2021


(SALAH-UD-DIN)
MEMBER (JUDICIAL)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

ORDER

15.09.2021

Ms. Uzma Syed, Advocate for the appellant present. Mr. Sher Bahadar ADO (Litigation) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is accepted and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

15.09.2021




(SALAH-UD-DIN)
MEMBER (JUDICIAL)



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

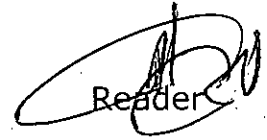
09.12.2020

Due to COVID-19, case is adjourned to 02.03.2021 for the same as before.


Reader

02.03.2021

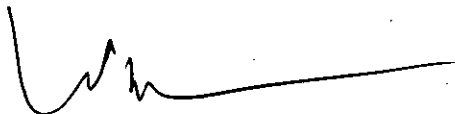
Due to COVID-19, case is adjourned for the same on 31.05.2021 before D.B.



Reader

31.05.2021

Nemo for the appellant. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Notice for prosecution of the appeal be issued to appellant as well as her counsel and to come up for rejoinder and arguments before the D.B on 15.09.2021.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)


06.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 29.06.2020 for the same. To come up for the same as before S.B.


Reader

29.06.2020

The Worthy Chairman is on leave, therefore, the case is adjourned. To come up on 18.08.2020 before S.B.

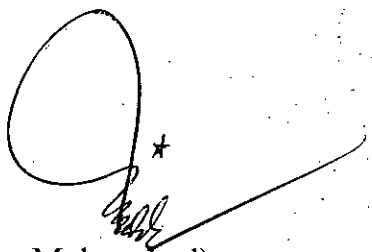

Reader

18.08.2020

Counsel for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Sher Zada, ADEO for respondents present.

Written reply on behalf of respondents not submitted. Representative of the respondents seeks time. Last opportunity granted for submission of written reply.

Adjourned to 08.10.2020 before S.B.


(Mian Muhammad)
Member(E)

08.10.2020

Appellant in person, Addl. AG alongwith Sherzada, ADEO for the respondents present.

Respondents have furnished parawise comments. Placed on record. The matter is assigned to D.B for arguments on 09.12.2020. The appellant may furnish rejoinder, within one month, if so advised.


Chairman

09.12.2019

Appellant in person and Addl. AG for the respondents present.

Representatives of the respondents seek time to furnish reply/comments. Adjourned to 21.01.2020 on which date the requisite reply/comments shall positively be submitted.


Chairman

21.01.2020


Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks time to contact the respondents and furnish the requisite reply/comments. Adjourned to 26.02.2020 on which date reply/comments shall positively be furnished.


Chairman

26.02.2020

Counsel for the appellant present. Nemo for respondents. Fresh notices be issued to them by way of last chance. To come up for written reply/comments on 06.04.2020 before S.B.


(Hussain Shah)
Member

09.10.2019

Counsel for the appellant present.

Contends that the appellant was imposed upon the major punishment of removal from service through notification dated 20.04.2019. The order was, however, given effect from 01.01.2019 which was not allowable under the law. Further contends that the show cause notice was required to be issued against an absenting civil servant in two leading newspapers as required by the rules. The newspapers, as mentioned in the impugned order, were neither leading nor having formidable circulation in the area. It was also argued that the period of absence attributable to the appellant was part of winter vacation but the said fact was avoided by the respondents. The departmental appeal submitted by the appellant on 08.05.2019 remained unresponded till filing of instant service appeal.

Instant appeal is admitted to regular hearing in view of the available record. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 09.12.2019 before S.B.



Appellant Deposited
Security & Process Fee
9/10/19


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1096/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/08/2019	<p>The appeal of Mst. Shema presented today by Uzma Syed 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 27/8/19</p>
2-	28/08/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/10/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1096 /2019

Shema


V/S

Education Deptt:


INDEX

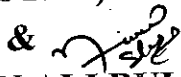
S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	1-3
2.	Copy of impugned order	A	4-05
3.	Copy of Departmental appeal	B	06-07
6.	Vakalat nama	-----	8

APPELLANT

 SHEEMA

THROUGH:


(UZMA SYED)

& 
(SYED NOMAN ALI BULHARI)
ADVOCATE, HIGH COURT.

9-12

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1096 /2019

MST. Shema Ex-PST
GGPS, Jaren Ranolia District Kohistan.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1209

Dated 27-8-2019

(Appellant)

VERSUS

1. The Director Education E&SE ,KP, Peshawar.
2. The District Education Officer Female Kohistan.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 20.04.2019 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM THE SERVICE WITH RETROSPECTIVE EFFECT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

Filed to-day

Registrar

27/8/19

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 20.04.2019 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO 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.

RESPECTFULLY SHEWETH:

1. That the appellant joined the Education department as PST in year 2015 and work with zeal and devotion.
2. That without observing codal formalities, including charge sheet, show cause etc, not served upon the appellant. Further it is added that the appellant was shown absent in the days of winter vacation. Thereafter, without show cause and personal hearing the appellant was removed from the service vide order dated 20.04.2019. the appellant feeling aggrieved from the order dated 20.04.2019 and filed departmental appeal against the same, which was not responded within statutory periods of 90 days. **(Copies of impugned order and departmental appeal are attached as Annexure-A&B).**
3. That now the appellant come to this august Tribunal on the following grounds amongst others.

GROUNDS:

- A) That the order dated 20.04.2019 and not deciding departmental appeal of the appellant within statutory periods of 90 days are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That the appellant has been condemned unheard and has not been treated according to law and rules.
- C) That in kohistan, in those days the winter vacation was started i.e from 25-12-2018 to 25-03-2019 and the appellant was shown absent in winter vacations. Further it is added that the roads were block due to heavy snowfall. So, it not possible to visit the school in vacations, so the action taken against the appellant is against the natural justice.
- D) That no proper regular inquiry was conducted if any then the appellant not associated with the inquiry, neither the statement recorded in presence of appellant nor was the chance of cross examination provided to the appellant and also not provided the inquiry report to the appellant and without final show cause notice the impugned order was passed which is against the law and rules and norms of justice.
- E) That the opportunity of personal hearing and personal defense was not provided to the appellant.

- F) That the appellant has not been treated according to law and rules.
- G) That the appellant seeks permission 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.

APPELLANT
[Signature]
SHEMA

THROUGH:

[Signature]
(UZMA SYED)
[Signature]
(SYED NOMAN ALI BULHARI)
 ADVOCATE, HIGH COURT.

Date. 27-8-2019

(A) (u)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

NOTIFICATION

Whereas the following teachers were reported wilful absent from duties by the concerned Assistant Sub Divisional Education Officers (Female), Sub Divisional Education Officers (Female) and Independent Monitoring Unit (IMU) Kohistan.

And whereas on the report of the visiting officers, this office issued show cause notices at home address through registered posts but neither the teachers joined their duties nor submitted convincing replies within the stipulated time (15 days) before the committees constituted for personal hearing vide this office letter no. 394-98 dated 11-02-2019 and the same were conveyed to the teachers in time.

And whereas final show cause notices were issued through two leading newspapers i.e. Daily "Tazara News" Mansehra and Daily "Akhbaar" Abbottabad dated 26/02/2019 in which teachers were directed to assume their duties and submit reason (s) of their wilful absence but neither they attended their schools nor submitted convincing replies before the committee within the stipulated period mentioned in the newspaper. Now in view of the above facts I, Mr. Khurshid Ahmed, being competent authority, as District Education Officer (female) Kohistan, is fully satisfied to impose major penalty of REMOVAL FROM SERVICE upon the teachers under rule 4b(iii) of E&D Rules 2011 with effect from the dates mentioned against each.

S#	NAME OF TEACHER	NAME OF SCHOOL	DATE OF REMOVAL FROM SERVICE
1	Lazhaba (G-4)	GGPS Pashot	01-10-2016
2	Sadaf Zeb	GGPS Pashot	01-10-2017
3	Raqiba	GGPS Ser Garhi	01-10-2017
4	Asma	GGPS Ser Garhi	01-10-2017
5	Farzana Wali	GGPS Jhakh Lohi	01-04-2018
6	Shaheen Zammeer	GGPS Lohi Dader	01-10-2018
7	Gul Bibi	GGPS Baja Lohi	01-04-2018
8	Nuzhat Ara	GGPS Harban kot	01-05-2018
9	Tahmina Roohi	GGPS Kuz Kamila	01-01-2017
10	Zuhra Bibi	GGPS Kherza Khail Dader	01-10-2015
11	Nagina Orail (G-4)	GGPS Baja Lohi	01-05-2016
12	Shagufta Kiran	GGPS Dhoop Lohi	01-01-2019
13	Gul Bibi	GGPS Serai Shah	01-04-2018
14	Zamina	GGPS Kemia Abad	01-01-2019
15	Salma Bibi	GGPS Kemia Abad	01-01-2019
16	Shakira	GGPS Mehran Abad	01-03-2018
17	Masooma	GGPS Ghee Harban	01-04-2018
18	Latifa	GGPS Ghee Harban	01-01-2019
19	Johaira Bibi	GGPS Bar Bak	01-04-2018
20	Rashooda Bano	GGPS Serto Kandia	01-10-2017
21	Rehana	GGPS Seri Gabriel	01-01-2019
22	Sara Qayum	GGPS Seri Gabriel	01-11-2018
23	Aisha Sadiq	GGPS Soyul Jashoi	01-04-2018
24	Bibi Hawa (G-4)	GGPS Awaysach	01-12-2016
25	Fahmceda	GGPS Bhati Kuz Shrial	01-11-2017

ATTACHED

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26	Bushra Hafeez	GGPS Bhati Kuz Shiryal	01-01-2019
27	Salma	GGPS Momin Abad	01-01-2019
28	Safia Zareen	GGPS Sanga Abad	01-01-2019
29	Naheed Sartaj	GGPS Sanga Abad	01-01-2019
30	Mehnaz	GGPS Berser Shered	01-11-2017
31	Aisha Qureshi	GGPS Habib Abad	01-11-2017
32	Shema	GGPS Jaren Ranolia	01-01-2019
33	Durkhana	GGPS Kas Dobair	01-03-2017
34	Robina Syed	GGPS Ali Abad	01-11-2018
35	Nasreen Sultan	GGPS Tares	01-12-2018
36	Fatima Akhtar	GGPS Serzahab Abad	01-02-2019
37	Rizwana Bibi	GGPS Z K Abad	01-12-2018
38	Mufced Akhtar	GGPS Sher Abad	01-12-2018

NOTE: Any teacher who is found involved in any embezzlement of fund/conditional grant, she will be proceeded for FIR/Anti-corruption proceedings as and when reported at any stage. Concerned DDOs are directed to recover the payment (if any) made for absence period out of their GPF etc.

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

Endst No: 1198-1210 Dated: 20-04-2019

Copy for Information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohistan.
3. Deputy Commissioner Kohistan Lower.
4. Deputy Commissioner Kolai Palas Kohistan.
5. District Monitoring Officer Kohistan.
6. DEO (M) Kohistan Lower & Kolai Palas Kohistan.
7. District Accounts Officer Kohistan.
8. PA to Advisor to CM for Elementary & Secondary Education Khyber Pakhtunkhwa.
9. PA to Secretary (E&SE) Govt of Khyber Pakhtunkhwa Peshawar.
10. All concerned teachers.
11. PA to DEO (M/F) Kohistan.
12. Office copy.

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

Handwritten signature and text:
13m
Attested

The Director Education
(B&SE), K.P. Peshawari

(8)

(6)

Through: Proper channel.

Subject: Departmental Appeal of the against
the order dated 20-4-2019 where by
the Appellant has been removed from service
from the date 01-01-2019.

Respectfully states,

1. That the appellant joined the present Deptt.
in the year 2015 and worked with full zeal
& zest.

That the Department without following proper
procedure in the the days of winter weather
the appellant was shown absent and dismissed
from service vide order dated 20-4-2019
which is not sustainable in the eye of law.

Hence the appellant against file present
Departmental appeal on the following grounds

P.T.

Attested

Grounds

1) That the impugned order 2-4-2019 is against the law, rules & norms of Justice, so, liable to be set aside.

2) That No proper opportunity of defence was provided to the appellant before major penalty which is against the law.

3) That the appellant was on winter vacata all the action taken against the appellant the back of appellant.

That the in Kohistan in winter vacation all the roads were block due to heavy snow fall so, it not possible to visit the school in vacation, so the action taken against the appellant is against the natural Justice.

4) That, the appellant's conduct which should be so, the impugned order is liable to be set aside.

Prayer:

It is, most humbly Prayed that the impugned order may be set aside, the appellant may be reinstated in all back & consequential benefits.

Mob:

Appellant

Attested

Ph: No = 0348555-292 = Shera

GGPS Jaran Ranola

2019ء منجانب

Shema بنام

education

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

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

آن مقام Peshawar کیلئے عظمیٰ سپر ایڈوائسٹ پیسٹاد

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے جج کے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے

سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

2019

8

ماہ

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المرقوم

العبد گواہ العبد

کے لئے منظور ہے۔

Peshawar

مقام

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE
TRIBUNAL KPK PESHAWAR.

Service appeal No.1096/2019.

Shema

Appellant.

Versus

Govt: of KPK etc

Respondents.

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4	Absence Report from SDEO Concerned & IMU	DEF	7-9

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**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE
TRIBUNAL KPK PESHAWAR.**

Service appeal No.1096/2019.

Shema

Appellant.

Versus

Govt: of KPK etc

Respondents.

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.

Preliminary Objections.

1. That the appellant is not an aggrieved person.
2. That the appellant has got no cause of action to file the instant appeal.
3. That the appeal is not maintainable in the present circumstances of the issue.
4. That the appellant has concealed the material facts from this Hon'ble tribunal.
5. That the appeal is time barred and not maintainable in eye of law.
6. That the appeal is groundless and based on malafide, hence the same is liable to be dismissed.
7. That the appellant has estopped by her own conduct.
8. That the service appeal is against the facts, prevailing rules and policy.
9. That the tribunal has no jurisdiction to adjudicate the matter.
10. That the appellant has been come to the tribunal with unclean hands

ON FACTS.

1. Incorrect, as it needs cogent proof.
2. Incorrect, as the appellant was reported willful absent from her duty by the concerned IMU and other visiting Officers at GGPS Jareen Ranolia Lower Kohistan, the competent authority issued show Cause Notice at home address through registered post, but neither the teacher joined her duty nor submitted convincing replies with in the stipulated time before the committee constituted for personal hearing vide office letter No. 394-98 dated 11-02-2019 and the same was conveyed to the teacher in time, and then final show cause notice was issued through two leading news papers i-e Daily "Hazara News" Mansehra and daily "Akhbar" Abbott Abad dated 26-02-2019 and 27-2-2019 in which the teacher was directed to assume her duty and submit reason of her willful absence but neither she attended her school nor submitted convincing replies before the competent authority within the stipulated period mentioned in the news papers,

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Therefore after completion of codal formalities, she was removed from service. (Show Cause Notice, cutting of News Papers, inquiry report of SDEO (F) Pattan are attached as Annexure A,B,C) and the appellant was shown absent in working days and the order dated 20-4-2019 is according to law and rules.


3. No comments.

GROUND.

- A. Incorrect, as she has not submitted the departmental appeal properly.
- B. Incorrect, as the appellant has been treated according to law and rules.
- C. Incorrect, as the appellant was shown absent in working days.
- D. Incorrect, as the proper regular inquiry was conducted.
- E. Incorrect, as the opportunity of personal hearing was provided to the appellant.
- F. Incorrect.
- G. That the defendants seek permission to advance other grounds and proofs at the time of hearing.

It is therefore, humbly prayed that on acceptance of above parawise comments the instant service appeal may graciously be dismissed with cost.

Secretary, 
Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Deptt:
Peshawar.


Director,
Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Deptt:
Peshawar.

Dy:

District Education Officer
(Female) Kohistan Lower.

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE
TRIBUNAL KPK PESHAWAR.**

Service appeal No.1096/2019.

Shema

Appellant.

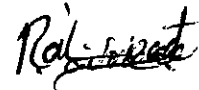
Versus

Govt: of KPK etc

Respondents.

AFFIDAVIT.

I, Mr: Rahim Dad ADEO(Litigation) Kohistan Lower do hereby solemnly affirm and declare that the contents of the para wise comments are true and correct to the best of my knowledge and belief.



DEPONENT.

"A" (4)

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OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN

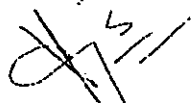
FINAL SHOW CAUSE NOTICE

I, Mr. Khurshid Ahmed, District Education Officer, (Male) Kohistan, being a competent authority under the Khyber Pakhtunkhwa Govt: Servants (E&D) Rules, 2011, do hereby serve you Mst: Sheema PST GGPS Jareen Ranolui as follows:

1. That consequent upon the report of IMU, your school was found closed & non-functional since long. You remained absent from your School duties willfully.
2. I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:
 - (i). ~~Guilty of habitually absents herself from duty without prior approval of leave.~~ }
4. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty under rule 4 (b) of the said rules.
5. You are therefore, required to finally 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.
6. If no reply to this notice is received within seven days or not more than fifteen 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.

Endstt: No 324 /Dated Kohistan the 1-2- /2019
Copy of the above is forwarded to the:-

1. Mst: Sheema PST
GGPS Jareen Ranolui


COMPETENT AUTHORITY
(District Education officer)
(F) Kohistan

No. 1544

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

Rs. Ps.
38

Received a registered*
addressed to _____

Date-Stamp _____

Initials of Receiving Officer PS
*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.
Insured for Rs. (in figures) _____ (in words) _____

If insured.

Insurance fee Rs. 60 Ps. 00 Weight 1 Kilo Grams 00
(in words) _____
Name and address of sender Ranolui J/2

سربراہ نے جین VC اجلاس میں شاہکی اراضی و گنزارا کی ترقیاتی قرارداد

اجلاس میں سربراہ نے شاہکی اراضی و گنزارا کی ترقیاتی قرارداد کی منظوری کا اعلان کیا۔ اس موقع پر سربراہ نے شاہکی اراضی و گنزارا کی ترقیاتی قرارداد کی منظوری کا اعلان کیا۔ اس موقع پر سربراہ نے شاہکی اراضی و گنزارا کی ترقیاتی قرارداد کی منظوری کا اعلان کیا۔



شاہکی اراضی و گنزارا کی ترقیاتی قرارداد کی منظوری کا اعلان کرتے ہوئے سربراہ کی تقریب

شاہکی اراضی و گنزارا کی ترقیاتی قرارداد کی منظوری کا اعلان کرتے ہوئے سربراہ نے کہا کہ اس قرارداد سے شاہکی اراضی و گنزارا کی ترقیاتی کارروائیوں میں ترقیاتی کاموں کی رفتار بڑھے گی۔ اس قرارداد سے شاہکی اراضی و گنزارا کی ترقیاتی کارروائیوں میں ترقیاتی کاموں کی رفتار بڑھے گی۔

128
(5)
(B)

وزیر اعلیٰ صاحب

11/12/2011

حکمران PO
تمام کو رعایت
محکمات (مستعار) حکومت
صداک پاکستان اور پبلک انٹرنیشنل
اس میں برقی قوت سے ہی اس طرح
اعدادہ خوردگی کی مقدار میں کمی

ritonoil.com
ANTS LLC

بریش شیکنا لوجی بہ
اعلیٰ کوالٹی بہ
50311

ٹینس فیسٹری

آپ کو مطلع کیا جاتا ہے کہ ٹینس فیسٹری میں سے فیسٹریوں کو آپ کا پکی فیسٹری کے پاس سے ملے گا۔ اس فیسٹری میں سے ملے گا۔ اس فیسٹری میں سے ملے گا۔ اس فیسٹری میں سے ملے گا۔

سلاٹ نمبر	نام	نمبر	سلاٹ نمبر	نام
1	لاہور PST	20	GGPS پٹوٹ	GGPS پٹوٹ
2	صوفیہ PST	21	GGPS پٹوٹ	GGPS پٹوٹ
3	راہوہ PST	22	GGPS پٹوٹ	GGPS پٹوٹ
4	ماسرہ PST	23	GGPS پٹوٹ	GGPS پٹوٹ
5	فرزندانہ PST	24	GGPS پٹوٹ	GGPS پٹوٹ
6	شاہین پور PST	25	GGPS پٹوٹ	GGPS پٹوٹ
7	گولڈن سٹی PST	26	GGPS پٹوٹ	GGPS پٹوٹ
8	نورستان PST	27	GGPS پٹوٹ	GGPS پٹوٹ
9	چیمبرس PST	28	GGPS پٹوٹ	GGPS پٹوٹ
10	درویشی PST	29	GGPS پٹوٹ	GGPS پٹوٹ
11	وکیل آباد PST	30	GGPS پٹوٹ	GGPS پٹوٹ
12	گھنڈی پور PST	31	GGPS پٹوٹ	GGPS پٹوٹ
13	گولڈن سٹی PST	32	GGPS پٹوٹ	GGPS پٹوٹ
14	روڈیہ PST	33	GGPS پٹوٹ	GGPS پٹوٹ
15	سلاٹ نمبر 15	34	GGPS پٹوٹ	GGPS پٹوٹ
16	شاہ پور PST	35	GGPS پٹوٹ	GGPS پٹوٹ
17	صوفیہ PST	36	GGPS پٹوٹ	GGPS پٹوٹ
18	گولڈن سٹی PST	37	GGPS پٹوٹ	GGPS پٹوٹ
19	چیمبرس PST	38	GGPS پٹوٹ	GGPS پٹوٹ

INF(AD)43

ڈسٹرکٹ ایجوکیشن آفیسر (زبانہ) ضلع کوہستان



11/12/2011

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Nov & Dec 2018 / Non Functional schools

Office of the Sub-Division Female Pattan

List of non Functional schools of subdivision Pattan

No	EMIS Code	School Name	Circle Name	Reason for non functional School
1	30639	GGPS Dhok B.Z	Dubair	Miss Robi and Shaheen have been terminated on 2017.
2	32690	GGPS Jalkot Ranolia	Dubair	Miss Nelam Akhter has transferred to Abbottabad vide Director no.8674-80 Dated 24-10-2018
3	30503	GGPS Jareen Ranolia	Dubair	Sheema PST pay stop and report submitted to DEO Office For furthe process.
4	30545	GGPS Kas Dubair	Dubair	Durkhana PST pay stop and report submitte to DEO Office For furthe process.
5	30652	GGPS Alidaf Khel	Dubair	Post vacant due to Safia parveen pst has been medical board one 2018
6	30661	GGPS Seri Dubair	Dubair	Post vacant
7	32685	GGPS Yanri Qaila	Dubair	Post vacant
8	38553	GGPS Banil	Dubair	Post vacant
9	30582	GGPS Dhub shamal	Pattan	Shaila pst transferred on 6-12-2018
10	30634	GGPS Shah abad	Pattan	Robina syed PST pay stop and report submitte to DEO Office For furthe process.
11	30806	GGPS All Abad	Pattan	Amina bibi BPS-4 pay stpped due to court case and absent from duty.
12	32684	GGPS Kuz Saprana	Pattan	Mear bibi BPS-4 pay stpped due to court case and absent from duty
13	32688	GGPS Hargah	Pattan	Miss Amira Khan And Nasren Sutlan pay stopped and case move to deo office for further N.A
14	33118	GGPS Tarees	Pattan	Miss koser fatima was on medical leave
15	37375	GGPS Dustum abad	Pattan	Fatima akhter pst pay stopped and case move to deo office for further process
16	37882	GGPS Sirzahab abad	Pattan	Post vacant due to newly established
17	41422	GGPS Faiz abad	Pattan	Post vacant due to shortge of teaching staff
18	30534	GGPS Kamar banda	Pattan	Post vacant due to shortge of teaching staff
19	30572	GGPS Dachi	Pattan	Naseem Akhter has transferred to Distt: SWAT recently
20	30666	GGPS Sheshal keyal	Pattan	Miss Rizwana pay stopped and case move to deo office for further legal action
21	30672	GGPS Z.K Abad	Pattan	Post Vacant
22	38555	GGPS Ziargai	Pattan	Mufeed Akhter & Sadia siraj pay stopped and case move to deo office for further legal action
23			Pattan	

[Handwritten signature]

D 11 7
Dubair

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) KOHISTAN.

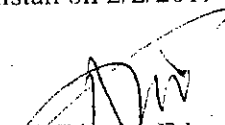
List of final Show cause & Show cause reported by IMU Pattan

(10)
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Name & Disg; with School	Absent reported by	Absent status	Show cause E/ No	Receipt
Sheema PST GGPS Jarcon ranolia ✓	IMU ✓	Non Functional	E/ No. 324 dated 01/02/2019 ✓	پوسٹ
Dur Khana PST GGPS Kas Dubair	IMU	Non Fictional	E/No.325 dated 1/2/2019	پوسٹ
Robina Syed PST GGPS Ali Abad	IMU	Non Functional	E/ No. 326 dated 01/02/2019	خان محمد
Amira Khan PST GGPS Tarees	IMU	Non Functional	E/ No. 327dated 01/02/2019	فضل الرحمن
Nasreen Sultan PST GGPS Tarees	IMU	Non Functional	E/ No. 328dated 01/02/2019	فضل الرحمن
Fatima Akhter PST GGPS Ser Zahab Abad	IMU	Non Functional	E/ No. 329dated 01/02/2019	فضل احمد
Rizwana PST GGPS Z-K Abad	IMU	Non Functional	E/ No. 330dated 01/02/2019	عبدالرحمان
Mufeed Akhter .PST GGPS Sher Abad	IMU	Non Functional	E/ No. 331dated 01/02/2019	محمد ظفر
Sadia Scraj PST GGPS Sher Abad	IMU	Non Functional	E/ No. 332dated 01/02/2019	سadia

Note.

The SDEO (F) Pattan with the directions to registered the above mentioned final show Causes on through post office on their home addresses & postal original slip duly stamped by the concerned post office may be submit to the office of DEO (F) Kohistan on 2/2/2019 for record.


 District Education Officer
 (female) Kohistan

(E) 8

EMIS Code	Name of School	Gender	District	UC Name	School Status	Reason	Monitoring Date	Remarks
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Student and teaching Staff Absent	2019-11-26 11:14:22	This school is permanently nonfunctional since long for unknown reasons. The school was reported as closed each month since June 2019 and was reported as nonfunctional in months prior to that. Educational or learning activity has not taken place here since unknown time period.
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Permanent Non Functional	2019-10-04 10:22:14	non functional since very long.
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Permanent Non Functional	2019-09-24 08:33:14	The school is nonfunctional since long. The building is demolished by ERRA.
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Student and teaching Staff Absent	2019-08-22 12:08:45	local community says that school is closed since very long
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Permanent Non Functional	2019-06-21 11:30:29	non functional. no sign of building. School is found non functional and shelterless.
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Permanent Non Functional	2019-03-21 12:47:25	according to locals school is closed from last two years for unknown reasons.
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Permanent Non Functional	2018-11-24 12:41:39	School non functional due to its hard and far flung location .
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	merged	2018-09-14 10:40:19	GGPS jareen Ranolia is merged due to its inaccessible location and prevalent non functional status.
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	Permanent Non Functional	2018-10-26 09:50:54	All teaching staff absent here since very long. building is demolished in 2005 earthquake. while chowkidar and students are also absent here and school is not adjusted in any other building yet. .
30503	GGPS JAREEN RANOLIA	Girls	LOWER KOHISTAN	RANOLIA	close	merged	2018-08-18 08:38:40	This school has been merged due to its non functional status notified by education office.

(G)

(F)