



963/2012

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	24.4.2019	<p><u>Present.</u></p> <p>Mr. Amin Ayub, .. For appellant Advocate</p> <p>Mr. Muhammad Jan, Dy. District Attorney with Abdur Rahman, Dy. DEO ... For respondents</p> <p>Vide our detailed judgment in Service Appeal No. 961/2012 (Mst. Zaib-ul-Haram Vs. Executive District Officer, E&SE, Kohistan and others), the appeal in hand is also dismissed. Parties are left to bear their respective costs. File be consigned to the record room.</p> <p> Member</p> <p> Chairman</p> <p><u>ANNOUNCED</u> 24.04.2019</p>

25.02.2019

Counsel for the appellant and Mr. Ziaullah, DDA alongwith Abdur Rahman, Dy. DEO for the respondents present.

Representative of the respondents requests for further time to produce the record pertaining to proceedings against the appellant and also the order, if any, regarding the regularization of service of the appellant. May do so positively on the next date. Adjourned to 24.04.2019 before the D.B.


Member


Chairman

12.12.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present.

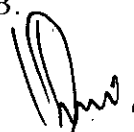
At the outset learned DDA raised objection regarding the jurisdiction of this Tribunal in entertaining the appeal in hand. In his view the appellant was a contract employee and was never regularized, therefore, did not fall within the definition of civil servant.

~~On the other hand, learned counsel for appellant~~ requested for time to meet the objection as it was raised for the first time since the pendency of the appeal from 2012..

On 26.06.2018 the representative of respondents was directed to ensure the availability of original record pertaining to the proceedings against the appellant and similarly placed others. However, the requisite record is yet to be produced by the respondents. In addition to the said record the parties are directed to produce the order of regularization of services of appellant, if any, on next date of hearing.

Adjourned to 25.01.2019 for hearing before the D.B.


Member


Chairman

25.01.2019

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 25.02.2019 before D.B.


Member


Member

17.09.2018

Clerk to counsel for the appellant present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 15.10.2018 before the D.B. at camp court, Abbottabad.


Member


Chairman
Camp Court, A/Abad

15.10.2018

Mr. Muhammad Ali, Husband of the appellant Miss Nusrat Begum. Mr. Fazal Rahim, ADO alongwith Mr. Usman Ghani, District Attorney for the respondents present. Due to general strike of the Khyber Pakhtunkhwa Bar Council, counsel for the appellant is not in attendance. Attorney for the appellant submitted an application for transfer of the case to Principal Seat Peshawar as they belong to Malakand Division and their counsel is practicing at Peshawar. Application is allowed. To come up for arguments on 26.11.2018 before the D.B. at Principal Seat Peshawar.


Member


Chairman
Camp Court, A/Abad

26.11.2018

Junior to counsel for the appellant and Mr. Riaz Paindkhel learned Assistant Advocate General for the respondents present. Junior to counsel for the appellant seeks adjournment as learned senior counsel is busy before Hon'ble Peshawar high court. Adjourn. To come up for arguments on 12.12.2018 before D.B.


Member


Member

26.06.2018

Muhammad Ali, husband of the appellant alongwith his counsel Mr. Amin Ayub, Advocate present. Mr. Fazal Rahim, ADO(Lit) alongwith Mr. Ziaullah, Deputy District Attorney for respondents present.

The above named representative produced the Diary dispatch register which shows that at Sr. No. 2206-10 dated 01.06.2010 termination order was issued to 12 PST female teachers, copy of the same is placed on record. However, during the course of arguments, learned counsel for the appellant next argued that no enquiry, no show cause notice and no statement of allegations were issued and the appellant was terminated from service without compliance of the legal formalities. At this stage the learned DDA stated that though it is mentioned in their comments as attached but the same is not attached being not provided to them. In short, there is no record of the above mentioned documents on the file, as such the representative of the respondents is directed to bring the entire record of enquiry and its report including charge sheet, statement of allegations and show cause notice etc on 27.08.2018 before D.B at camp court A/Abad. Being an old case of 2012 the above named representative is directed to make sure the production of record if available without fail otherwise coercive measure will be taken against them.

[Signature]

Member

[Signature]

Chairman

Camp court, A/Abad

27-8-18:-

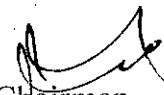
*No one present for appellant -
Fazal Rahim ADO present for respondents -
Due to summer vacations, case to come
up for the same on 17-9-18, at C.C.
A/Abad.*

*heaven
Dendu*

21.02.2018

Counsel for the appellant and Addl. AG alongwith Muhammad Zahoor, SI (Legal) for the respondents present. The learned AAG seeks time to provide the record. Last chance is given. To come up for record and arguments arguments on 16.04.2018 before the D.B at camp court, Abbottabad.

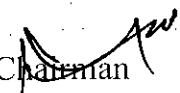

Member


Chairman
Camp court, A/Abad.

16.04.2018


Counsel for the appellant and Mr. Usman Ghani District Attorney alongwith Abdur Rahman, DDEO (F) for the respondents present. During the course of arguments, it transpired that the department has not produced termination order nor the despite/diary of the said order has been produced. The departmental representative is directed to produce the same positively on the next date otherwise coercive measures will be adopted against the departmental representative. To come up for arguments on 25.06.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad

25.06.2018

Mr. Muhammad Ali, Husband of the appellant present. Mr. Fazal Rahim, ADO alongwith Mr. Usman Ghani District Attorney District Attorney for the respondents present. To come up for further proceedings/arguments on 26.06.2018 before the D.B at camp court, Abbottabad.


Member
Camp court, A/Abad

25.05.2017


Since tour programme to camp court, Abbottabad for the month of May, 2017 has been cancelled by the Worthy Chairman, therefore, to come up for the same on 22.11.2017 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly


Registrar

22.11.2017

Counsel for the appellant and Addl. AG for the respondents present. After hearing the appeal at some length this Tribunal reaches the conclusion that in order to clarify as to whether the impugned order was passed on 01.06.2010 or 01.06.2012 and the same was received by the appellant on 01.06.2010 and 01.06.2012, the original record is required. The respondents are directed to bring the original record. To come up for such record and arguments on 15.01.2018 before D.B at camp court, Abbottabad.



Member


Chairman
Camp Court, A/Abad.

15.1.2018

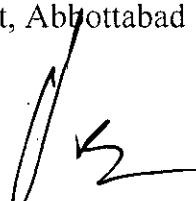
Clerk of counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondents present. Due to general strike of the bar, counsel for the appellant is not in attendance. To come up for arguments on 21.02.2018 before the D.B at camp court, Abbottabad.



Member


Chairman
Camp court, A/Abad.

19.09.2016

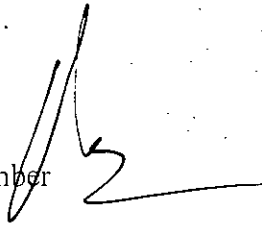
Mr. Muhammad Ali, husband of the appellant and Mr. Shamsul Haq, ADO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Counsel for the appellant has not turned up from Peshawar. Requested for adjournment. To come up for final hearing on 18.1.2017 before the D.B at camp court, Abbottabad



Member


Chairman
Camp court, A/Abad

18.01.2017

Muhammad Ali, husband of the appellant and Mr. Muhammad Siddique, Sr.GP for the respondents present. Submitted application for transfer of the case as well as adjournment. Since the case pertains to territorial limits of Hazara Division as such the application is decline. Appeal however, adjourned for final hearing to 17.05.2017 before D.B at camp court A/Abad.


Member


Chairman
Camp court A/Abad.

17.6.2015

Mr. Muhammad Ali, husband of the appellant and Mr. Shamsul Haq, ADO alongwith Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Due to non-availability of D.B, appeal is adjourned for final hearing before D.B to 21.10.2015 at camp court A/Abad.


Chairman
Camp Court A/Abad

21.10.2015

Mr. Muhammad Ali, brother of the appellant, on behalf of the appellant and Mr. Shamsul Haq, ADO (lit.) alongwith Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Due to non-availability of D.B, arguments could not be heard. To come up for final hearing before D.B on 15.3.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad.

15.03.2016

Mr. Muhammad Ali, husband of the appellant and Mr. Shamsul Haq, ADO alongwith Mr. Muhammad Saddique, Sr.G.P for respondents present. Arguments could not be heard due to non-availability of D.B. To come up for final hearing before D.B on 19.9.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad


25.8.2014

Mr. Muhammad Ali, husband of the appellant, on behalf of the appellant and Mr. Khurshid Khan, SO for respondent No. 4 with Mr. Kabirullah Khan Khattak, Assistant Advocate General for the respondents present. Rejoinder has not been received, and request for further time made on behalf of the appellant. To come up for rejoinder alongwith connected ^{appeals} on 23.12.2014.


Chairman

23.12.2014

Clerk of counsel for the appellant and Mr. Gul Rehman, Deputy DEO on behalf of respondents No. 1 and 2 with Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for rejoinder alongwith connected appeals on 11.03.2015.


Reader

11.03.2015

Agent of counsel for the appellant and Mr. Gull Rehman, ADO for respondents alongwith Addl. A.G present. Rejoinder submitted. The appeal pertains to territorial limits of Hazara Division and as such assigned to D.B for final hearing/arguments for 17.6.2015 at Camp Court Abbottabad.


Chairman

963/12

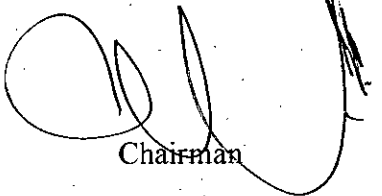
18.11.2013

Since 15th November has been declared as public holiday on account of Moharram-ul-Haram, case is adjourned to 13-2-14 for further proceedings.


Reader

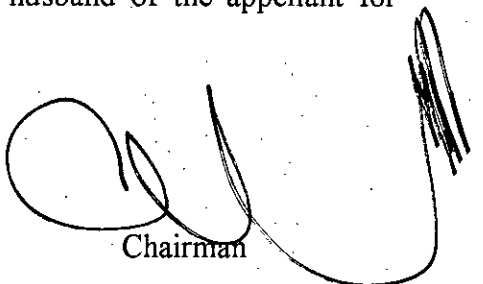
13.2.2014

Counsel for the appellant, M/S Sajjad Rashid, ADO for respondent No. 3 and Khurshid Khan, SO for respondent No. 4 with AAG for the respondents present. Written reply has not been received despite several chance given for the purpose. Therefore, a last chance is given for written reply/comments alongwith connected appeals on 15.5.2014.


Chairman

15.5.2014

Mr. Muhammad Ali, husband of the appellant, on behalf of the appellant and Mr. Abdur Rehman, SDEO(F) Kohistan for respondents No.1 & 2 with AAG for the respondents present. Written reply received on behalf of respondents No.1,3 & 4, and representative of the respondents stated that the same reply be also considered on behalf of remaining respondent No.2. Copy of the written reply is handed over to the husband of the appellant for rejoinder on 25.8.2014.


Chairman

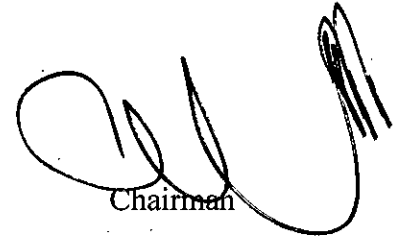
11.3.2013

Counsel for the appellant, M/S Mosam Khan, AD for respondent No. 3 and Khurshid Khan, SO for respondent No. 4 with AAG for the respondent present. Written reply has not been received and request for further time made on behalf of respondents. To come up for written reply on 22.5.2013.


Member

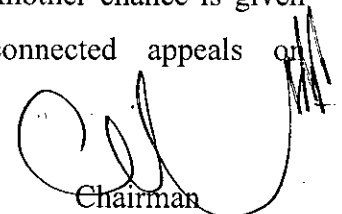
24.5.2013

Mr. Muhammad Ali Khan, husband of the appellant, on behalf of the appellant, M/S Mosam Khan, AD for respondents No. 1 to 3 and Khurshid Khan, SO for respondent No. 4 with Mr. Usman Ghani, Sr. GP present. Written reply has not been received. Representatives of the respondents requested for further time on the ground that they have not yet received copy of the appeal. Copy of the appeal be provided to the respondents for written reply/comments alongwith connected appeals on 25.7.2013.


Chairman

25.7.2013

Counsel for the appellant, M/S Abdur Rehman, ADO (Lit) Kohistan for respondents No. 1 and 2 and Khurshid Khan, SO for respondent No. 4 with Mr. Usman Ghani, Sr. GP for the respondents present. Written reply has not been received, and representatives of the respondents requested for further time. Another chance is given for written reply/comments alongwith connected appeals on 15.11.2013


Chairman

Appeal no. 963/2012.

Nusrat Begum.

4. 14.12.2012

Counsel for the appellant present and heard.

Contended that the appellant has not been treated in accordance with the law. Vide the impugned order dated 1.6.2010, communicated to her on 1.6.2012, whereby the appellant has been terminated from service but no proper procedure has been adopted, as no show cause notice/charge sheet/statement of allegations/final show cause notice has been served upon the appellant. No inquiry was conducted and the appellant has been condemned unheard. There is tempering in the impugned order which shows malafide on the part of the respondents. The appellant preferred a departmental appeal on 1.6.2012 but the same has been not been responded so far. Points raised need consideration. The appeal is admitted to regular hearing, subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notice be issued to the respondents. Case adjourned to 15.1.2013 for submission of written reply.

Member.

5. 14.12.2012

This case be put before the Final Bench P for further proceedings.

Chairman

15-01-2013 :-

Counsel for the appellant and Khushid Akad S.O. (Lit) for respondent present. The worthy chair-man is an honor to present case to come up for written reply/comment on 11-3-2013.

نور احمد

6.11.2012

Counsel for the appellant present. The learned Member is on tour to Camp Court Swat. Case adjourned to 14.12.2012 for preliminary hearing.

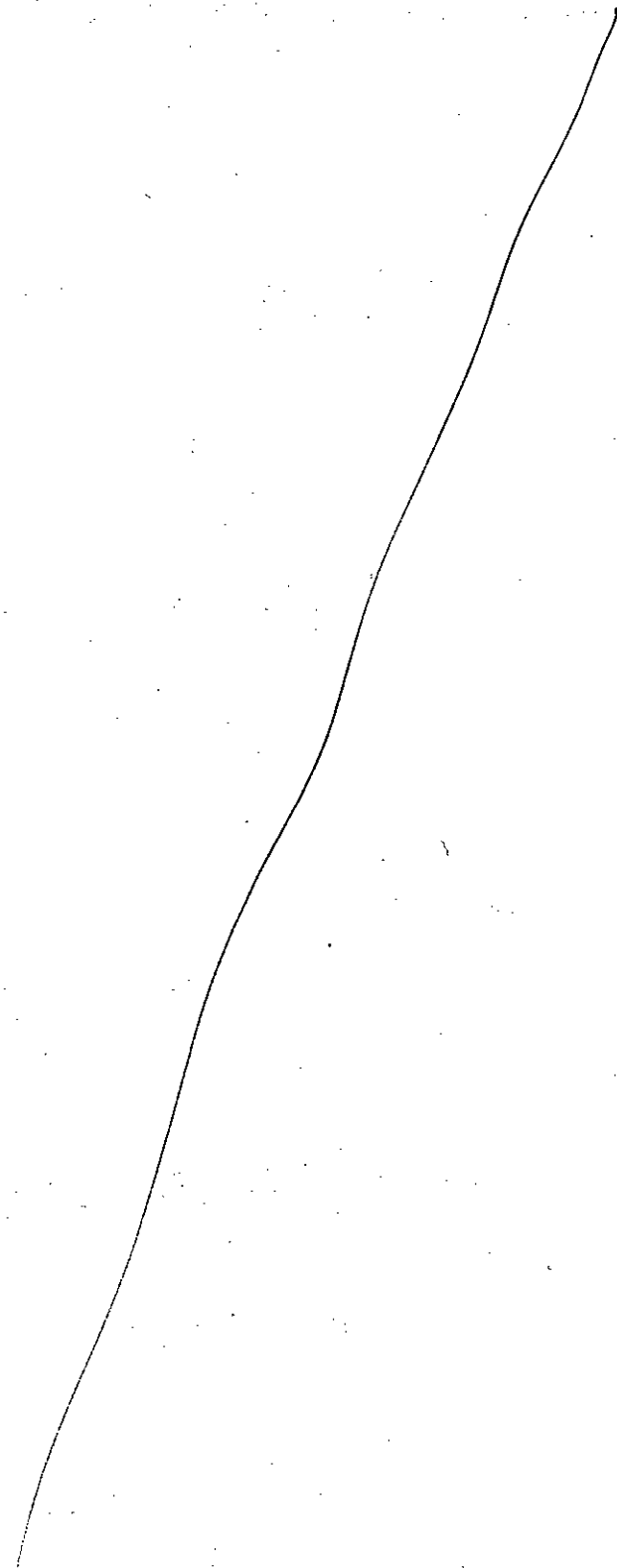

Reader.

3. 16.10.2012

Munshi to Counsel for the appellant present and requested for adjournment. Case adjourned to 6.11.2012 for preliminary hearing.




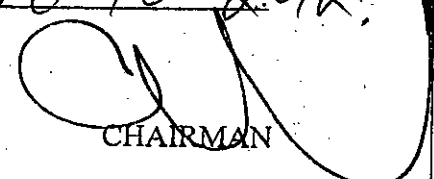
Member.



Form- A
FORM OF ORDER SHEET

Court of -----

Case No. 963/2012

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate.
1	2	3
1	28/8/12	<p>The appeal of Mst. Nusrat Begum submitted today by Mr. Khaled Rehman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p> REGISTRAR</p>
2	3-9-2012	<p>This case is entrusted to Primary Bench for Preliminary Hearing to be put up there on <u>16-10-2012</u>.</p> <p> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 963 /2012

Mst. Nusrat Begum

.....Appellant

Versus

The EDO (E&SE) and
others

.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-6
2.	Extracts from Service Book		A	7-9
3.	Appellant's application transfer to District Swat		B	0-10
4.	Transfer order	22.02.2012	C	0-11
5.	Application	03.05.2012	D	0-12
6.	Impugned order	01.06.2010	E	0-13
7.	Departmental appeal		F	14-15
8.	Wakalat Nama			

Through


Appellant

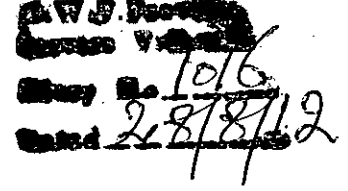
Khaled Rahman
Advocate, Peshawar

9-B, Haroon Mansion,
Khyber Bazar, Peshawar.
Cell # 0345-9337312

Dated: 23 / 08/ 2012

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 963 /2012

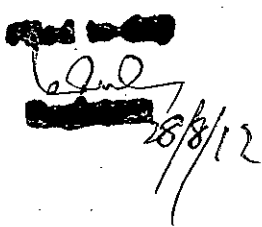


 Date: 28/8/12

Mst. Nusrat Begum,
 Ex-PST. Wife of Muhammad Ali Khan,
 R/o Beha, Tehsil Matta, District Swat.Appellant

Versus

1. The Executive District Officer,
Elementary & Secondary Education,
District Kohistan.
2. The District Coordination Officer,
District Kohistan,
3. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Attached Departments
Complex, Peshawar.
4. The Secretary,
Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education,
Civil Secretariat, Peshawar.....Respondents



 SERVICE APPEAL UNDER SECTION-10 OF THE
 KHYBER PAKHTUNKHWA REMOVAL FROM
 SERVICE (SPECIAL POWERS) ORDINANCE, 2000
 READ WITH SECTION-4 OF THE KHYBER
 PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974
 AGAINST THE IMPUGNED ORDER DATED
 01.06.2010 COMMUNICATED ON 01.06.2012
 WHEREBY THE SERVICES OF THE APPELLANT
 WERE UNLAWFULLY TERMINATED AGAINST
 WHICH APPELLANT PREFERRED A
 DEPARTMENTAL APPEAL TO RESPONDENT NO.2

ON THE SAME DATE BUT THE SAME WAS NOT DECIDED WITHIN THE STATUTORY PERIOD.

PRAYER:

On acceptance of the instant appeal, the impugned order dated 01.06.2010 communicated on 01.06.2012 may graciously be set aside and appellant be reinstated into service with all back benefits and Respondents be also directed to release the salaries of appellant outstanding w.e.f. December, 2009 and onwards with any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant was appointed as PST on 27.12.1999 and posted at GGPS Seri Gabral, District Kohistan where she had been performing her duties regularly to the entire satisfaction of her high-ups. (Extracts from the Service Book *Annex:-A*).
2. That in the year 2009, when the Law & Order situation at District Swat was quite vulnerable, the salary of the appellant was stopped w.e.f. December, 2009 and continued so, however, appellant continued performing her duties regularly and requested/agitated against the stoppage of her salaries from time to time but without any positive result.

3. That after the situation at Swat was regained, appellant being the resident of District Swat applied (*Annex:-B*) to the competent authority for her transfer to District Swat, which was non-objected to by Respondent No.1 on 15.10.2010 vide endorsement on the same application, however, the matter remained pending until finally a second approval was obtained from the Respondent No.1 on 11.02.2012, a transfer order dated 22.02.2012 (*Annex:-C*) was issued by Respondent No.3 whereby appellant was transferred from GGPS Dadeer Jamra Kohistan to GGPS Doghallgay Beha, Swat.
4. That after the transfer order, appellant took charge at the new school and started performing her duties there, however, time and again she approached the Respondent No.1 for the release of her outstanding salaries and for issuing LPC etc. to the appellant to enable her to get salaries at Swat but he made malafide excuses and delayed the matter by one pretext or the other for ulterior motives and finally on the refusal of the appellant, she was unlawfully suspended.
5. That appellant vide her application dated 03.05.2012 (*Annex:-D*) brought her grievances into the notice of Respondent No.2 but on 01.06.2012, appellant was informed by Respondent No.1 that her services had been terminated due to the alleged prolonged absence. After much efforts the impugned order dated 01.06.2010 (*Annex:-E*) was obtained by the

appellant which clearly shows overwriting on the date of issue of the order reflecting malafide on the part of Respondent No.1 thus appellant on the same day preferred departmental appeal (*Annex:- F*) to Respondent No.2 but the same was not disposed of within the statutory period, hence this appeal inter-alia on the following grounds:-

Grounds:

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned order and stopped the salaries of the appellant, which are unjust, unfair and hence not sustainable in the eye of law.
- B. That the impugned termination order is a malafide order on the part of Respondent No.1, who issued the same after granting approval of transfer to appellant and her transfer order but has shown the date of the order as 01.06.2010 so as to damage the service career of the appellant for the sole reason of not toeing his line for ulterior motives, therefore, the impugned order is void, arbitrary, without jurisdiction and hence not sustainable in the eye of law.
- C. That neither Charge Sheet and Statement of allegations were issued to the appellant nor any enquiry was conducted into the matter, nor any

final show Cause Notice was given to her, nor was she afforded an opportunity of personal hearing rather the impugned order was issued in a highly slipshod and fill in the blank manner which is not sustainable under any canons of law, justice and fair-play.

- D. That appellant had been performing her duties regularly and she has never remained absent from her duties otherwise, she would not have been transferred from District Kohistan to District Swat but since Respondent No.1 was interested in her termination for ulterior motives, therefore, he issued the impugned order under the false pretext of absence from duty although till date no explanation etc. has been called from the appellant for her absence from duty.
- E. That the salaries of the appellant were unlawfully stopped w.e.f. December, 2009 till the communication of the impugned order for the release of which appellant traversed the offices of the Respondents time and again but the same were not released and finally after her transfer when she approached the high ups she was shown doors vide the impugned order by Respondent No.1.
- F. That appellant has been victimized at the hand of Respondent No.1 who issued the impugned order in a highly unsympathetic way least caring about the longstanding service career of the appellant, therefore, the impugned order is wrong, illegal, malafide, against the principles of natural justice,

therefore, not maintainable.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Through


Appellant

Khaled Rahman,
Advocate, Peshawar.

Dated: 23 / 08/ 2012

Ames A

P-7

A

9 Signature of Government Servant	10 Signature and name of the head of office or other officer in Station of posts 1 to 8	11 Date of termination of appointment	12 Reason of termination (such as promotion, transfer, dismissal, etc.)	13 Signature of the head of the office or other attesting officer	14 Leave		15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	
						Period	
						Acceptance Appeal/Adjustment, release of pay and Adjusted to 495 Jandar Kot Jalloi. The intervening period is here by deducted leave with out pay vide Encl. No, 8935-39 date, 21/9/06 w.e.f 30/12/99 to 10/9/206 -	
							<p>Service Verified w.e.f. 11-9-06 to 30/11/06 from acq. Roll & other record of this office.</p> <p><i>[Signature]</i> Dy. District Officer (F) Schools & Literacy Kohistan</p>
						<p>Dairwan officer pay vide PO No 63 dated 9/5/07 pay w.e.f 11/9/06 to 31/3/07 (6-M & 20-Days) 33247/2</p> <p><i>[Signature]</i> Dy. District Officer (F) Schools & Literacy Kohistan</p>	
							<p>Service Verified w.e.f. 1-12-06 to 30-6-07 from acq. Roll & other record of this office.</p> <p><i>[Signature]</i> Dy. District Officer (F) Schools & Literacy Kohistan</p>

ATTESTED

8	9	10	11	12	13		14
					Leave		
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabile to another Government.	
Signature and designation of the head of office or other attesting officer in forms 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	Period	Government to which debitabile	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
Signature of Government Servant	S.D.E.O. (F) Kohistan 30-16-2000	Fixed	S.D.E.O. (F) Kohistan			Appoinment as P.T. Teacher at G.E.P. Seri Gabriel Kohistan	
Signature of Government Servant		Scale revis	S.D.E.O. (F) Kohistan			Under D.E.O (M) Pny: Kohistan Bsdost: NO, 775-91 date, 27-12-99	
Signature of Government Servant							S.D.E.O. (F) Kohistan
Signature of Government Servant						Service Verified w.e.f 30-12-99 to 30-11-2000 from A/Roll and other record of this office	
Signature of Government Servant							S.D.E.O. (F) Kohistan
Signature of Government Servant						Service Verified w.e.f 1-12-2000 to 30-11-02 from acq: Roll & other Record of this office	
Signature of Government Servant							Dy. District Officer (F) Schools & Literacy Kohistan
Signature of Government Servant		Adjusted ecps Jandankoi				Service Verified w.e.f 1-12-01 to 30-11-03 from acq: Roll & other Record of this office.	
Signature of Government Servant		S/R					Dy. District Officer (F) Schools & Literacy Kohistan
Signature of Government Servant						Service Verified w.e.f 1-12-02 to 30-11-03 from acq: Roll & other Record of this office	
Signature of Government Servant							Dy. District Officer (F) Schools & Literacy Kohistan
Signature of Government Servant						Service Verified w.e.f 1-12-03 to 30-11-05 from acq: Roll & other Record of this office	
Signature of Government Servant							

Name of post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service courts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for Officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of office Government of West Bengal
PT TEACHER e.e.p.s Sevi Gabryal			BPS No. 7 Rs. 1480/-			14-80-81-2695	
u			Rs. 1480/2			30-12-1999	NUSRET Begum
u			(BPS No. 7 Rs. 2220/-)				
u			Rs. 1480/-			12-2000	NUSRET Begum
u			BPS (R) Rs. 2220-120-5820				
u			Rs. 2220/-			1-12-01	NUSRET Begum
u			Rs. 2220/-			1-12-02	NUSRET Begum
u			Rs. 2220/-			1-12-03	NUSRET Begum
u			Rs. 2220/-			1-12-04	NUSRET Begum
u			BPS 7 Rs. (2555-140-6755)				
e.e.p.s Jendhar Kari			Rs. 2555/-			1-7-05	NUSRET Begum
u			Rs. 2555/2			1-12-06	NUSRET Begum
Yamri Qabaga			BPS No-07 (2940-160-7740)				
u			Rs. 2940/-			1-7-07	NUSRET Begum
u			Rs. 2940/-			1-12-07	

OFFICIAL
ATTEN

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: Ms NUSRAT BEGUM

2. Race: AFGAN

3. Residence: VILLAGE BEHA TEHSIL MATIA DISTRICT SWAT

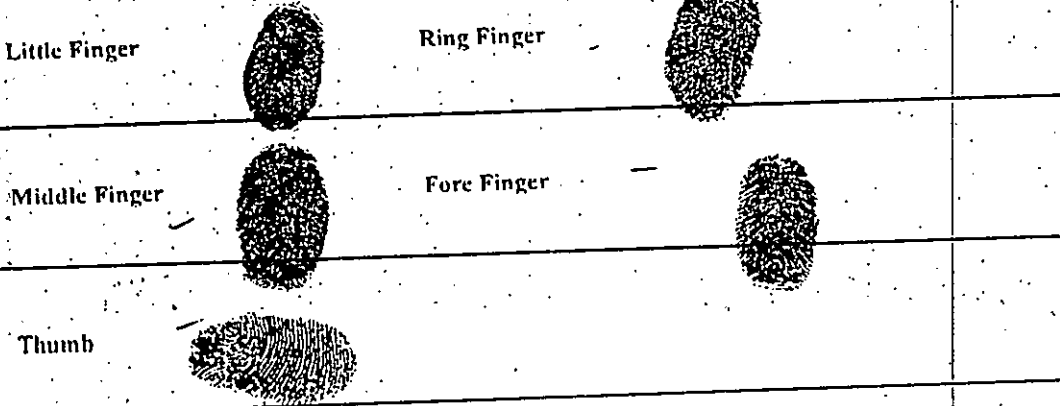
4. Father's name and residence: MOHAMMAD AMIN MATIA SWAT

5. Date of birth by Christian areas nearly as can be ascertained: 04/04/1971

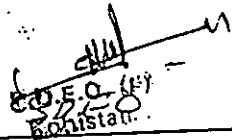
6. Exact height by measurement: 5-3"

7. Personal marks for Identification

8. Left hand thumb and Finger Impression of (non-Gazetted) Officer.



9. Signature of Government Servant: Nusrat Begum

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

N/S
N/S
N/S
N/S
N/S

F:
D:
ne
E:

(For use in Police Department only)

Heirs:---

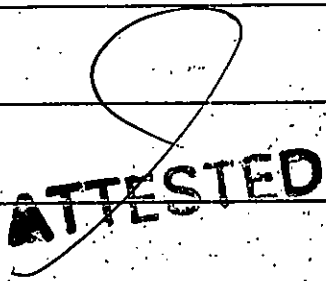
- 1.
- 2.
- 3.

Verification Roll No. dated received back.

Passed S.S.C Examination from BISE
under R.O. Marks obt.
Session

Left Thumb-Impression

[Signature]
 S.D.O. (P)
 Kohistan

Qualifications	Date	Qualifications	Date
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership Examination	
Plan-Drawing		Training School Final Examination	
Finger Print		Other Qualifications:---	
Drill Instructing			
Court Duties			
Reserve Duties			

N.B-- Lhs to be drawn under the qualification possessed.

Ann-B P-10

84 9/10/95

APPLICATION FORM FOR INTER/INTRA-DISTRICT TRANSFER

- 1. Name of the Teacher/Applicant & District of Domicile: NASRAT BEGUM SWAT D.C.
- 2. Designation/Post held with BPS: Dadeer Jambra
- 3. Date of 1st appointment: 1999
- 4. Date of taking over charge of present post: GGPS Dadeer
- 5. Name of Present schools of posting: GGPS Dadeer
- 6. Name of School where posting is required (list three options): Home District
- 7. Reason for Transfer: Home District
- 8. Previous No. 00374601

I solemnly declare that all these information from Sr. No. 1 to 6 are correct.

Signature: Nusrat Begum
 Name of Applicant: Nusrat Begum
 I.D Card No. 11/97/1517x

Certificate by the relieving EDO

Certified that I have no objection to the transfer of Mr./Ms Nusrat Begum from GGPS Dadeer to Swat

The following arrangement will be made by me for filling up the post of Dadeer Jambra in case of transfer of Mr./Ms Nusrat Begum

- (i) It is certified that:
 - The study/education of the students of the institution/school will not suffer with the proposed transfer.
 - The applicant is regular employee & not a contract one.

Signature: Mukhtiar
 Name of E.D.O: Mukhtiar
 EXECUTIVE DISTRICT OFFICER
 Elementary & Secondary Education
 Dist. Kohistan
 No. 11/97/1517x

No. 40

POST-VAILABILITY CERTIFICATE OF THE EXECUTIVE DISTRICT OFFICER FOR POSTING IS PROPOSED

I have no objection to the transfer of Mr./Ms NASRAT BEGUM against a vacant post of Dadeer at (name of) Swat District. COULDN'T SIGN
Deqhalqy Beha of District Swat has examined his/her relevant documents and found correct. It is also certified that no objection has been issued to any other person against this post.

Signature: [Signature]
 Name of the EDO: Executive District Officer
 Elementary & Secondary Education, Swat

ATTACHED

Ames, C P-11

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

NOTIFICATION

Consequent upon the ban relaxation by the competent authority, the following posting/transfers of PST (Female) are hereby ordered in their own pay & BPS in the interest of public service with immediate effect.

S#	Name & Designation	From	To	Remarks
1	Mst. Naseema Khan PST	GGPS Seglo Kohistan.	GGPS Mian Kalay Tajarry Swat	Against V/Post
2	Mst. Nusrat Begum PST	GGPS Dadeer Jamra Kohistan	GGPS Daghally Beha Swat	-do-

Note:-

- iv. Charge report should be sent to all concerned.
- v. No TA/DA etc are allowed
- vi. The EDOs (E&SE) are directed to check the original service document before making payment of their salaries.

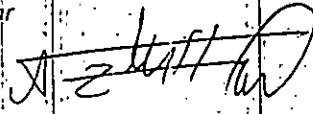
DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 2160-66 / F.No.99/PTC(F) Transfer Swat Dated Peshawar the 22/2 2012

Copy of the above is to the:-

1. Executive District Officer (E&SE) Kohistan & Swat
2. District accounts Officers Kohistan & Swat.
3. Teachers concerned.
4. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar
5. Master File.


Deputy Director (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

ATTESTED

Annex D P-12

کفو رہتا ہے۔ DCO صاحب ضلع کینیا

ضلع کینیا! دروازہ دہلی ہے :-

1- یہ سائل کو ملازمہ سے ملا کر Suspend کیا گیا ہے

2- یہ سائل نے اپنے دیوانہ خانوں سے فراہم دینی آرڈر کیا ہے

اس کے باوجود سائل کو کینیا میں

3- یہ سائل کو دسمبر 2009 کے لئے ناظر نامہ فراہم کیا گیا ہے۔ یہ سائل

4- یہ سائل کو DCO کے حکم کے تحت دہلی سے سائل کو فراہم کیا گیا ہے

صرف 4 کو فراہم کیا گیا ہے۔ یہ سائل کو کینیا میں

باوجود اس کے کہ فراہم کیا گیا ہے۔ یہ سائل

Re- State کے لئے فراہم کیا گیا ہے

فراہم کیا گیا ہے

ATTESTED

03-05-2019

Dy DDO (F)

District Registrar

ATTESTED Dy Commr Pst GPs

2- Dy Commr Pst GPs

3- Dy Commr Pst GPs

4- Dy Commr Pst GPs

EDD (Ed)

03-05-2019

ATTESTED

ATTESTED

ATTESTED

DDO (F)

Due to long absence the ap-
have been terminated by EDO office
vide Order: NO - 2206-10 dated 01/20/10
Their Salaries has not been drawn.

Same report is submitted for
further N/A Please.

3/5/2012
Assistant
A/C Bank.

Copy
Report of Assistant
is hereby submitted for
N/A Please

[Signature]

Amna, E

P-13

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION KOHISTAN

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer (Female) Elementary & Secondary Education Kohistan the Service of the following Female P.T.C teachers ^{are} hereby terminated due to prolong absent from their duties under special leave of absence Finance-2001 on disciplinary Ground with immediate effect in the interest of public

Name of Teacher	School	Absentee Period	Remarks
Farooq Kiran	GPS Bela Dubair	From 12/11/2009	Terminated from Service
Blahat Begum	GPS Gabair Ranolia	-do-	-do-
Uzaid Begum	GPS Bela Dubair	-do-	-do-
Leena Kanwal	GPS Bela Dubair	-do-	-do-
Yasmin Elan	GPS Bela Dubair	-do-	-do-
Shahid Hameed	GPS Shatal	-do-	-do-
Hussain Elan	GPS Kayal Village	-do-	-do-
Noreen	GPS Sulemanabad	-do-	-do-
Naila Farzeed	GPS Qamar Band	-do-	-do-
Sadia Bibi	GPS Hayderabad	-do-	-do-
Sadaf Farzeed	GPS Khatt Karin	-do-	-do-
Bibi Begum	GPS Samad Abad	-do-	-do-

Sel
Executive District Officer
(E & S) Education Kohistan

Dist No. 2206-10

Dated Kohistan, the 1-6-2010

- Copy of this notification is forwarded to the:-
1. P.O. to Director, Elementary & Secondary Education Department KPK Peshawar
 2. District Coordinator, Education Officer Kohistan
 3. District Accountant, Education Officer Kohistan
 4. Dy. District Officer, Education Officer ERSE Kohistan

M. H. S.
Executive District officer
(E & S) Education Kohistan

ATTESTED

Received
N. Begum
01/06/10

01/06/10

Amex F
گورجنا - CO صاحب کوسٹیاں

①

عنوان: ایسٹ برصغیر EDO صاحب دفتر، گورجنا، 10-2206-2206 فرم 01/06/01

یہاں عالی! درخواست / ارسال ذیل طرف سے

1- جس سالہ نئے سوا کے بارے میں جانیں اور صلہ کوسٹیاں میں سرکاری ملازمت ختم ہونے پر
کی حیثیت سے کئی سالوں سے انہی فریقین انجام دیتے رہے ہیں۔
PST

2- یہ کہہ کر ان کے پاس سے حاصل کیا گیا ہے کہ یہ سب صرف 03/05/03
میں EDO کی طرف سے یہ بات یہ کہہ کر تھی کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
بیمہ متعلقہ بننے میں یہ بات تو کیا گیا ہے کہ اس میں کوئی تبدیلی نہیں آئی ہے اور یہ بھی کیا گیا ہے کہ متعلقہ
کا نام اس میں سے بھی نہیں ہے۔

3- یہ امر فرم 01/03/06 کو سرکار اور ایف پی سی کی طرف سے ایسا لکھا گیا ہے کہ اس میں کوئی تبدیلی
نہ اس بات کی تھی کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
میں شامل نہیں ہیں۔ اس لیے کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے

4- یہ اس سے قبل جاریہ طرف سے ایک درخواست صرف 03/05/03 کو EDO صاحب کوسٹیاں کے نام ارسال
کی گئی تھی کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
میں نہیں لایا گیا۔ درخواست کو کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے

5- یہ صرف 02/05/11 کو EDO صاحب کوسٹیاں کی طرف سے معافی کے لیے درخواست کی گئی تھی کہ اس میں کوئی تبدیلی
کو NOC بمطابق آرڈر نمبر 66-2160 پیش اور ڈاکٹر کیس جاری کی گئی اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
تبادلہ کیا گیا۔ اس لیے کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے
ضرورت ہوتی ہے کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
و اس طرح کے سبب ہیں۔ جو کہ اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
ذاتی طور پر اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں
ذاتی طور پر اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں کوئی تبدیلی نہیں آئی ہے اور اس میں

ATTESTED
عزیز احمد

۱۔ یہ ایک ریگسٹریشن کی طرف سے فراہم کی گئی ہے۔ وہ بالکل بنیاد پر مشتمل ہے اور
 کاروائی ہے۔ بالکل متواتر دیر کی وہ سے طرف کی مقررہ ہے۔ کار
 دہری ہیں۔ جس کے متعلقہ کی طرف سے کیا گیا ہے۔ اس کو اس کے لئے جاری
 نہیں ملتا ہے۔ مقررہ اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔
 جاری کیا گیا ہے۔

۲۔ صدر بلدیہ ایس ایچ کے لئے درخواست کی طرف سے پیش کیا گیا ہے اور
 میں رکھی گئی اور ان کی طرف سے فراہم کی گئی ہے، وہ جعلی ہے۔ اس کے لئے جاری ہے۔
 جاری ہے۔

۳۔ ایس ایچ کے لئے درخواست کی طرف سے پیش کیا گیا ہے اور
 اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔
 اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔

01-05-12

V. B. Singh

OP

مستند اور اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔ اس کے لئے جاری ہے۔

ATTESTED

WAKALAT NAMA

IN THE COURT OF

Service Tribunal Peshawar

Mst. Nusrat Begum Appellant(s)/Petitioner(s)

VERSUS

The F.P.O. Educators
Distt Kohistan and Others Respondent(s)

I/We Applicant do hereby appoint
Mr. Khaled Rehman, Advocate in the above mentioned case, to do all or
any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this

Attested & Accepted by

Khaled Rehman,
Advocate, Peshawar.

9-B, Haroon Mansion
Khyber Bazar, Peshawar

N. Begum
Signature of Executants

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. ^{963/}963/2012

Mst. Nusrat Bibi Ex-PST GGPS Samad Abad, District Kohistan
.....Appellant

VERSUS

The Executive District Officer Elementary and Secondary Education Kohistan & others
..... Respondents

Written reply / Comments on behalf of Respondents No., 1 to 4.

Respectfully sheweth.

Preliminary Objections

1. That the appellant has got no cause of action / locus stand.
2. That the appellant has not come to the tribunal with clean hand.
3. That the appeal is not maintainable in the present circumstances of the issue.
4. That the appellant has stopped by her own conduct.
5. That the instant appeal is against the fact, prevailing rules and laws.
6. That appellant has concealed the material facts from Hon,able service tribunal.
7. That the appeal time barred and not main trainable in eyes of law and also violation of section 4 of Service Tribunal Act 1974.
8. That the appeal is groundless and based on malafide, hence the same is liable to be dismissed.

Factual Objections

1. Para No. 1 is correct to extent that appellant was appointed as PST in education Department in District Kohistan, that the remaining Para is incorrect, subject to proof.
2. Para No. 2 is incorrect, that the salary of the appellant was stopped due to her willful absence from school duties, written complaint of locality/inhabitanance, on receiving such complaint the matter was duly inquired through Assistant District

(copy of complaint/application of locality & Inquiry report are annexed as annex are A & B).

3. Para No. 3 is correct to extent that appellant approached to Hon,able Minister of Elementary and Secondary Education KPK Through application vides dated 01/02/2012 for inquiry and releasing of her salary but official had been terminated from service on 01/06/2010, such application has been submitted after laps of one year and 8th months, according to law & rule the every accused official has a time for appeal only 30 days after issuance of termination order. That the remarks/report of next higher authority on over leaf of the said application is baseless and incorrect, need proof.

(Copy of application of the accused official to the Hon,able Minister & Termination order are annexed as Annexure C & D).

4. Para No. 4 is incorrect that according to the rules within 30 days appeal lodged against her termination to next higher authority but the appellant submitted appeal against her termination to the respondents No. 2 on 03/05/2012 after the laps of two years. And expire of statutory period.

(Copy of application of the accused official is annexed as Annexure E).

GROUND

- A. Incorrect. that the said termination order is based on facts, in according with law, service rules, observed all codicil formulation/proceeding according with law, rules and policy.
- B. In correct, that termination order is not malafide, without prejudice, according to jurisdiction/authority provided by law.
- C. In correct, that authority has conducted proper inquiry i.e the accused official was called for explanation vide Deputy District Office Elementary & Secondary education (F) Kohistan Endst: No. 121 dated 04/02/2010 with the direction to submit her replay of allegation within 15 days. After expiring of stipulated period, The Deputy District Officer, E&SE Kohistan submitted report to the effect that the teacher concerned has not reported from school duty nor she submitted her reply

up to 26/02/2010, on the bases of such inquiry the EDO E & SE Kohistan has issued show cause notice to the accused official/appellant and other absent teachers vide Endst: No. 300-318 dated 28/02/2010 with the direction that all the absent including the appellant to attend their school duties and submit the report of show cause notice within 10 days that the copy of show cause notice was sent by post to the Home address of accused official and also handed over to the Mr. Fazal Rabbi Chowkidar GGPS Samad Abad with the direction to deliver such show cause notice to accused official

(Copy of Explanation/allegation dated 04/02/2010, Copy of report of Dy DO (F) Copy of show cause notice, dated 28/02/2010 are annexed as annexure F, G&H)


X

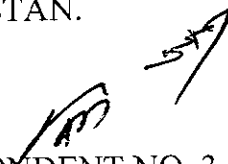
DO Officer, again reported that the teacher concerned has failed to submit her replay and is still willful absent for her duty vide Enst No 192 dated 16/03/2010 on the bases of such inquiry report of Dy DO (F) a final show cause notice was issued to the absent teachers including the appellant, that the copy of final show cause notice was sent by post to the Home address of accused official with the direction to resume their duties within 10 days otherwise disciplinary action shall be initiated against them under special power ordinance 2000. There after on issuance of final show cause notice the willful absent teacher/accused officials including appellant against failed to give reply of final show cause notice and resume to their duties. The appellant has been given reasonable opportunity and again a time to reply her charges, clear her position, reply her allegation but accused official had failed to attend the office and submit reply of allegation/charges. At last all the allegation/charges has been proved against accused official, on bases of such proceeding all willfully absent accused officials including appellant has been terminated from service vide notification Endst: No. 2206-10 dated 01/06/2010 that the copy of *termination order* was sent by post to the Home address of accused official. That the appellant has not filed proper appeal within statutory period, before next higher authority.


(Copy of report of Dy DO (F) dated 16/03/2010. Copy of final show cause notice, dated 01/05/2010. Copy of terminated order dated 01/06/2010 are annexed as annexure I, J & K)

- E. In correct that all position has been clarified in above Para D.
F. In correct, that the respondent's No. 1 has not victimized the appellant that the said order is legal, in accordance with law, facts, natural justice and tenable in the eye of law.

It is, therefore, requested that this Hon,able Tribunal may very graciously be pleased to dismiss the present appeal in hand with cost in favour of respondents.


RESPONDENT NO. 1
DISTRICT EDUCATION OFFICER (F)
KOHISTAN.


RESPONDENT NO. 3
THE DIRECTOR,
ELEMENTARY & SECONDARY EDUCATION,
KYBERPAKHTUNKHWA PESHAWAR.


RESPONDENT NO. 4
THE SECRETARY,
GOVT. OF KHYBERPAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION.

E.D.O - 1000

درخواست گزار کا نام غیر حاضر ہے

By Do (F)
Report

9/1/10

مستحقہ مفت پیپر PST نامی شخص نے دروازے سے سکول فرار
ہو گیا ہے۔ یہاں تک کہ ہم نے گزارہ اور سکول میں
چیک کیا کہیں نہیں ہے۔ اس شخص کے بارے میں درخواست
کے لیے میں متروک شدہ رہتا ہوں۔

لینا درخواست گزار کے بارے میں
رہنما کر کے اس شخص کو تلاش کرنے کے لیے
لاگیں۔ اور گزارہ شروع ہو گیا ہے۔

Attached

District Education Officer
(Female) Kohistan

آلہ فاروقی

11/1/10

Cont. Sup/A No

Details de Post

12/1/10

DDA (F)
Issued Explanation
Report

12/1/10

سائل گزار کے اعداد اور علاقے کے مطابق
لینا پیپر غیر حاضر ہے۔
12/1/2009

15/1/10

کتابت سہ ماہی سرکار
Form-B P-8

Enjo. Education
The Govt. of Punjab
matter of the
As responsible
relevant policy

Ministry for Elementary & Secondary Education
Lahore Pakistan

میرا نام ہے اور اس کے لئے یہ سب اہم ہے اور اس کے لئے
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دسمبر 2009ء سے جاری ہے اس کی کاپی AD 0 کو پیش
کے لئے کر رہے ہیں

20/05/09 کو سرکار سے
اس کے لئے یہ سب اہم ہے اور اس کے لئے یہ سب اہم ہے اور اس کے لئے

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Signature

(D)

(B)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION KOHISTAN

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer (Female) Elementary & Secondary Education, Kohistan the following PTC teachers are hereby terminated due to prolong absence from the following under special power of Finance Section, Government of Sindh in the interest of the service.

S. No.	Name of Teacher	School	Absence Period	Remarks
1	Farzana	GGPS Bela Dubair	From 12/11/2009	Terminated from Service
2	Narjis Begum	GGPS Gabahi Ramda	do	do
3	Musarrat	do	do	do
4	Fozia	GGPS Bela Dubair	do	do
5	Yasmin Khan	GGPS Bela Dubair	do	do
6	Zaib-ul-Harun	GGPS Sheetal	do	do
7	Hussain	GGPS Khyal Village	do	do
8	Noreena	GGPS Salamabad	do	do
9	Naila Faris	S Qamar Bazar	do	do
10	Sadia Bibi	S Hayderabad	do	do
11	Sadaq Aziz	S Khatt Karig	do	do
12	Bibi Ruqia	GGPS Samad Abad	do	do

Executive District Officer
(E & S) Education Kohistan

1-6-2010

Order No. 22/10

- 1. PA to D.O.
- 2. District Officer, Kohistan
- 3. District Officer, Kohistan
- 4. Dy. District Officer, Kohistan

Attended

District Education Officer
(Female) Kohistan

Executive District Officer
(E & S) Education Kohistan

Amo F
گورجنا - D.C.O. گورجنا

(E)

(1)

عنوان: ایس اے برغلون (D.O. گورجنا) کی طرف سے ڈی ایچ او گورجنا کی طرف سے 2206-1001-2206 فرم نمبر 03 کا

وہاں عالی درخواست ارسال ذیل طور پر ہے

✓ جس سے ایس ایچ او = گورجنا میں اور دھوا کوستان میں ایس ایچ او کوستان میں ایس ایچ او کوستان میں
کی صفحے سے کئی سالوں سے ایک طرف لفظ انجام دیتے رہے ہیں
PST

4- یہ کہہ جاتے ہیں کہ اس سے تعلق ہے کہ ایس ایچ او کوستان میں ایس ایچ او کوستان میں ایس ایچ او کوستان میں
2009 سے اس سے تعلق ہے کہ ایس ایچ او کوستان میں ایس ایچ او کوستان میں ایس ایچ او کوستان میں
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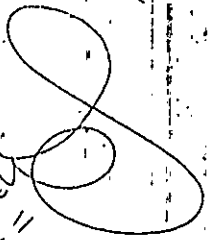
6- یہ کہہ جاتے ہیں کہ اس سے تعلق ہے کہ ایس ایچ او کوستان میں ایس ایچ او کوستان میں ایس ایچ او کوستان میں
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7- یہ کہہ جاتے ہیں کہ اس سے تعلق ہے کہ ایس ایچ او کوستان میں ایس ایچ او کوستان میں ایس ایچ او کوستان میں
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یہ ایک ایسی چیز ہے جس کی طرف سے اس کی طرف سے وہ بالکل سنبھلا کر منعقد اور
 کارروائی ہے۔ اس کی اس صورت میں اس سے اس طرح کی سبقت سے اس کی
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(6) (F)

OF THE DEPUTY DISTRICT OFFICER (FEMALE) ELEMENTARY
AND SECONDARY EDUCATION KOHISTAN

Mst Nusrat Begum PST
GGPS Gabeer Ranolia

EXPLANATION.

You are hereby called to explain your position that according to the report of Assistant District Officers Elementary and Secondary Education District you were found absent from your duty wef 12/11/2009 to up till now.

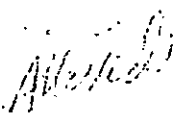
You are hereby directed to submit your written reply within 15 days to this issuing of this letter; other wise Disciplinary action shall be taken against you.

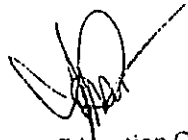

Deputy District Officer (F)
E&SE District Kohistan

120 / Dated Kohistan the 4/12/2010
The above is forwarded to the:-
Executive District Officer E&S E Kohistan.
District Officer Female E&SE Kohistan.
D O Circle Concerned


Deputy District Officer (F)
E&SE District Kohistan

DDO Sub-
deply over bear submitted
up till now 26/2




District Education Officer
(Female) Kohistan

OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY
AND SECONDARY EDUCATION KOHISTAN.


7
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STATEMENT OF ALLEGATION.

You Mst. Nisat Begum PTC teacher while posted at GGPS Gubies Raneria


in the capacity of PTC teacher has been found willfully absent from duty with effect from 12/1/2016 without any information or prior approval of the competent authority in utter disregard and repugnant to the relevant rules.

You did not respond and the explanation called for vide this office Memo No. 112 Dated 4/2/16 109, obviously it means that you have nothing in defense to absolve you of the charges leveled.

Mst. Nisat Begum

District Education Officer
(Female) Kohistan

Executive District Officer
E&SE District Kohistan

Deputy District Officer
E&SE District Kohistan

EDO Sab
reply not been submitted
up till now

26/2

(10)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION KOHISTAN.**

SHOW CAUSE NOTICE

You the following have illegally committed serious irregularity remained willfully absent from your duties from the date noted against your names. Your irresponsible attitude signify and tantamount to misconduct. Your long absence is the loss public interest and the teaching learning process and also against the service rules. Why not action should be taken against you under special ordinance 2000 or disciplinary action 1973 (Removal from Service).

S/No	Name of Teacher	Name of School		Absent Period	Name of Reported Officer/ ADO Circle
1	Zaibul Haram ✓	GGPS	Shatail	12/11/2009 to up till now	You have not submitted the reply of Explanation on due date.
2	Farzana Kiran	GGPS	Bela Dubair	-do-	-do-
3	Nahced Begum	GGPS	Gabeer Rania	-do-	-do-
4	Nusrat Begum ✓	GGPS	-do-	-do-	-do-
5	Fozia Kawal	GGPS	Bela Dubair	-do-	-do-
6	Yasmin Khan	GGPS	-do-	-do-	-do-
7	Hussan Bano	GGPS	Kayal Village	-do-	-do-
8	Noreena Bibi	GGPS	Suliman Abad	-do-	-do-
9	Naila Fareed	GGPS	Qammar Band	-do-	-do-
10	Sartaj Bibi	GGPS	Haydar Abad	-do-	-do-
11	Sarfaz Afzal	GGPS	Khat Karin	-do-	-do-
12	Bibi Ruqia ✓	GGPS	Samand Abad	-do-	-do-

Your reply should be reached within 10-days after the issuance of this show cause Notice. The undersigned may also be aware in written either you want to be heard in person did not response.

[Signature]
Executive District Officer
(E&SE) Kohistan

Endstt: No 360-318 Dated Kohistan the 22/2 2010

Copy of the above is forwarded to the:

1. PA to Director E&SE Khyber Pukhtonkhuwa Peshawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. Deputy District Officer (F) E&SE Kohistan.
6. A Teachers concerned.

[Signature]
Executive District Officer
(E&SE) Kohistan

Copy of the above is forwarded to the:
1. PA to Director E&SE Khyber Pukhtonkhuwa Peshawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. Deputy District Officer (F) E&SE Kohistan.
6. A Teachers concerned.

copy of show cause notice
been received
submitted due date up till
now
22/2/2010
23/2/2010
24/2/2010
25/2/2010
26/2/2010
27/2/2010
28/2/2010
29/2/2010
30/2/2010

GGPS
Shatail
Bela Dubair
Gabeer Rania
Bela Dubair
Kayal Village
Suliman Abad
Qammar Band
Haydar Abad
Khat Karin
Samand Abad

OFFICE OF DEPUTY
SECONDARY

LEMENTARY &

N.

13/2010

No. 1

To

The Executive District officer
(E&SE) Kohistan.

Subject;
Memo:

ACTION AGAINST THE ABSENT FEMALE PST

It is stated for your kind information that show cause notice issued from your office against the following PST teachers about their absentee and the undersigned directed by your good self to collect the reply from the concerned teachers. But they have not submitted their reply in this office so far.

Hence the report is submitted for your kind perusal and further necessary action please.

S/N o	Name of Teacher	Name of School		Remarks
1	Zaibul Haram	GGPS	Shatail	Still absent wef 12/11/2009
2	Farzana Kiran	GGPS	Bela Dubair	-do-
3	Naheed Begum	GGPS	Gabeer Ranolia	-do-
4	Nusrat Begum	GGPS	-do-	-do-
5	Fozia Kawal	GGPS	Bela Dubair	-do-
6	Yasmin Khan	GGPS	-do-	-do-
7	Hussan Bano	GGPS	Kayal Village	-do-
8	Noreena Bibi	GGPS	Suliman Abad	-do-
9	Naila Fareed	GGPS	Qanmar Band	-do-
10	Sartaj Bibi	GGPS	Haydar Abad	-do-
11	Sadaf Afzal	GGPS	Khat Karin	-do-
12	Bibi Ruqia	GGPS	Samand Abad	-do-

Deputy District Officer (F)
(E&SE) Kohistan

Endstt: No. 192-83 Dated Kohistan the 16/3/2010

Copy of the above is forwarded to the:

1. PA to Director E&SE Khyber Pukhtonkhuwa Peshawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. All Teachers concerned.

Deputy District Officer (F)
(E&SE) Kohistan

Attended
District Education Officer
(Female) Kohistan

(12)
(J)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION KOHISTAN

FINAL SHOW CAUSE NOTICE

You the following have illegally committed serious irregularity remained willfully absent from your duties with effect from 12/11/2009 to up till now. And Show cause notes already served vide this Office show cause notice no. 200-378 Dated 27-11-2010 about your long absence, but your reply has not been received after expire of due date and you Filed to proof their innocent.

You are once again directed/ given a final chance to submit your reply about their absenteeism and attend this Office for personal hearing with in 10- days after the issuing of this litter, otherwise disciplinary action should be taken against you under special ordinance 2000 and disciplinary action 1973 (Removal from service).

S/N	Name of Teacher	Name of School	Remarks
1	Zaibul Haram	GGPS Shatali	You have not submitted the reply of Show cause notice after expire due date.
2	Farzana Kiran	GGPS Bela Dubair	-do-
3	Naheed Begum	GGPS Gabeer Ranolla	-do-
4	Nusrat Begum	GGPS -do-	-do-
5	Fozia Kawal	GGPS Bela Dubair	-do-
6	Yasmin Khan	GGPS -do-	-do-
7	Hussan Bano	GGPS Kayal Village	-do-
8	Noreena Bibi	GGPS Sulman Ahsad	-do-
9	Naila Fareed	GGPS Qammar Band	-do-
10	Sartaj Bibi	GGPS Haydar Ahsad	-do-
11	Sadat Afzal	GGPS Khat Karan	-do-
12	Bibi Ruqia	GGPS Samana Ahsad	-do-

Sd/-
Executive District Officer
(E&SE) Kohistan

Endstt: No. 1-15-20 Dated Kohistan the 1-5 /2010

Copy of the above is forwarded to the:

1. PA to Director E&SE Khyber Pukhtunkhuwa Peshawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. Deputy District Officer (F) E&SE Kohistan.
6. All teachers concerned.

Shahid
Executive District Officer
(E&SE) Kohistan

[Signature]
District Education Officer
(Female) Kohistan

(K) (B)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION KOHISTAN**

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer (Female) Elementary & Secondary Education, Kohistan, the services of the following female PTC teachers ^{are} hereby terminated due to prolong absent from their duties under special power ordinance 2001 on disciplinary ground with immediate effect in the interest of public service.

S. #	Name of Teacher	School	Absent Period From 12/11/2009	Remarks
1	Farzana	GGPS Bela Dubair		Terminated from Service
2	Naheel Begum	GGPS Gabair Barolia		-do-
3	Nusrat Begum	-do-	-do-	-do-
4	Fozia Karwan	GGPS Bela Dubair	-do-	-do-
5	Yasmin Khan	GGPS Bela Dubair	-do-	-do-
6	Zaib-ur-Rahman	GGPS Shatial	-do-	-do-
7	Hussain	GGPS Koyal Village	-do-	-do-
8	Noreena	GGPS Sulamanabad	-do-	-do-
9	Naila Farooq	GGPS Qamar Band	-do-	-do-
10	Sartaj	GGPS Hyderabad	-do-	-do-
11	Sadat Aza	GGPS Khatt Karin	-do-	-do-
12	Bibi Ruzia	GGPS Samad Abad	-do-	-do-

Sd/
Executive District Officer
(E & S) Education Kohistan

Encls: No. 22/6-10

Dated Kohistan the 11/6 /2009

- Copy of the above is forwarded to the:-
1. PA to District Officer Elementary & Secondary Education Department KPK Peshawar
 2. District Officer Kohistan
 3. District Accounts Officer Kohistan
 4. Dy. District Officer (E & S) Education Kohistan

Sd/
Executive District Officer
(E & S) Education Kohistan

Sd/
District Education Officer
(Female) Kohistan

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OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE) ELEMENTARY
AND SECONDARY EDUCATION KOHISTAN

(6) (F)

Mst Nusrat Begum PST
GGPS Gabeer Ranolia

EXPLANATION.

You are hereby called to explain your position that according to the report of Assistant District Officers Elementary and Secondary Education District were found absent from your duty wef 12/11/2009 to up till now.

You are hereby directed to submit your written reply within 15 days to this effecting of this letter; other wise Disciplinary action shall be taken against you.

Sd/-
Deputy District Officer (F)
E&SE District Kohistan

12/11 / Dated Kohistan the 4/12/2010
above is forwarded to the:-
Deputy District Officer E&S E Kohistan:
Deputy District Officer Female E&SE Kohistan.
Circle Concerned

Sd/-
Deputy District Officer (F)
E&SE District Kohistan

*ED.O Sub -
reply ext been submitted
up till now*

Attested

Sd/-
District Education Officer
(Female) Kohistan

DEPARTMENT OF
EDUCATION
FARY MOHATAWEL

OF THE EXECUTIVE DISTRICT OFFICER, ELEMENTARY
AND SECONDARY EDUCATION KOHISTAN.

(7)
(6)


STATEMENT OF ALLEGATION.

You Mst. Mst. Gul Begum PTC teacher while posted at GGPS Gahoor Ranabita

in the capacity of PTC teacher has been found willfully absent from duty with effect from 12/1/2009 without any information or prior approval of the competent authority in utter disregard and repugnant to the relevant rules.


You did not respond and the explanation called for vide this office Memo No. 122

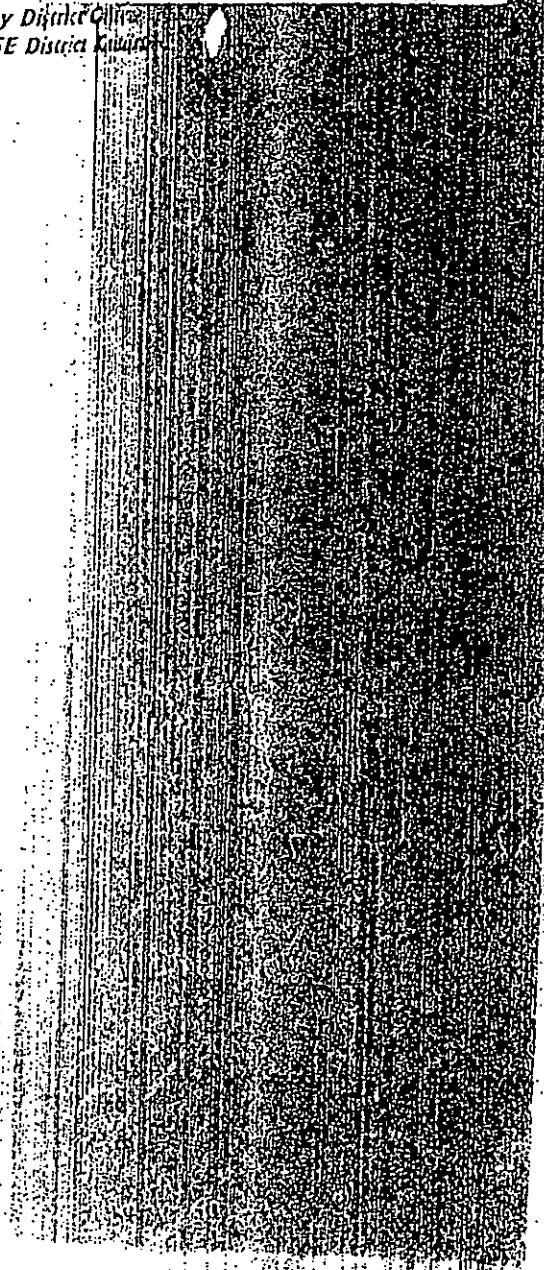
Dated 4/2/10 109, obviously it means that you have nothing in defense to absolve you of the charges leveled.


District Education Officer
(Female) Kohistan

Executive District Officer
E&SE District Kohistan

Deputy District Officer
E&SE District Kohistan

EDO Sab -
deply qst bean. Submitted
up till now 



④ 10

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION KOHISTAN.**

SHOW CAUSE NOTICE

You the following have illegally committed serious irregularity remained willfully absent from your duties from the date noted against your names. Your irresponsible attitude signify and tantamount to misconduct. Your long absence is the loss public interest and the teaching learning process and also against the service rules. Why not action should be taken against you under special ordinance 2000 or disciplinary action 1973 (Removal from Service).

S/No	Name of Teacher	Name of School		Absent Period	Name of Reported Officer/ ADO Circle
1	Zaibul Haram ✓	GGPS	Shatail	12/11/2009 to up till now	You have not submitted the reply of Explanation on due date.
2	Farzana Kiran	GGPS	Bela Dubair	-do-	-do-
3	Naheed Begum	GGPS	Gabeer Ranolia	-do-	-do-
4	Nusrat Begum ✓	GGPS	-do-	-do-	-do-
5	Fozia Kawal	GGPS	Bela Dubair	-do-	-do-
6	Yasmin Khan	GGPS	-do-	-do-	-do-
7	Hussan Bano	GGPS	Kayal Village	-do-	-do-
8	Noreena Bibi	GGPS	Suliman Abad	-do-	-do-
9	Naila Fareed	GGPS	Qammar Band	-do-	-do-
10	Sartaj Bibi	GGPS	Haydar Abad	-do-	-do-
11	Sadar Afzal	GGPS	Khat Karin	-do-	-do-
12	Bibi Ruqia ✓	GGPS	Samand Abad	-do-	-do-

Your reply should be reached within 10-days after the issuance of this show cause Notice. The undersigned may also be aware in written either you want to be heard in person did not response.

[Signature]
Executive District Officer
(E&SE) Kohistan.

Endstt: No 300-318 Dated Kohistan the 28/12/2010

Copy of the above is forwarded to the:

1. PA to Director E&SE Khyber Pukhtonkhuwa Peshawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. Deputy District Officer (F) E&SE Kohistan.
6. All Teachers concerned.

[Signature]
Executive District Officer
(E&SE) Kohistan.

*Copy of Show Cause notice
sent to becom Recorred
now. Submitted due date 17/12/10*

12/12/10
13/12/10
14/12/10
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1/1/11

Handwritten signatures and notes:
- *12/12/10*
- *13/12/10*
- *14/12/10*
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- *31/12/10*
- *1/1/11*

OFFICE OF THE DEPUTY
SECONDAR

LEMENTARY &

N.

13/2010

No

To

The Executive District officer
(E&SE) Kohistan.

Subject;
Memo:

ACTION AGAINST THE ABSENT FEMALE PST

It is stated for your kind information that show cause notice issued from your office against the following PST teachers about their absence and the undersigned directed by your good self to collect the reply from the concerned teachers. But they have not submitted their reply in this office so far.

Hence the report is submitted for your kind perusal and further necessary

action please.

S/N	Name of Teacher	Name of School		Remarks
1	Zaibul Haram	GGPS	Shataif	Still absent wef 12/11/2009
2	Farzana Kiran	GGPS	Bela Dubair	-do-
3	Naheed Begum	GGPS	Gabeer Ranolla	-do-
4	Nusrat Begum	GGPS	-do-	-do-
5	Fozia Kawal	GGPS	Bela Dubair	-do-
6	Yasmin Khan	GGPS	-do-	-do-
7	Hussan Bano	GGPS	Kayal Village	-do-
8	Noreena Bibi	GGPS	Suliman Abad	-do-
9	Naila Farceed	GGPS	Qammar Band	-do-
10	Sartaj Bibi	GGPS	Haydar Abad	-do-
11	Sadaf Afzal	GGPS	Khat Karin	-do-
12	Bibi Ruqia	GGPS	Samand Abad	-do-

Deputy District Officer (F)
(E&SE) Kohistan

Endstt: No 192-83 Dated Kohistan the 16/3/2010.

Copy of the above is forwarded to the:

1. PA to Director E&SE Khyber Pukhtonkhuwa Peshawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. All Teachers concerned.

Deputy District Officer (F)
(E&SE) Kohistan

District Education Officer
(Female) Kohistan

(12)
(J)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION KOHISTAN

FINAL SHOW CAUSE NOTICE

You the following have illegally committed serious irregularity remained willfully absent from your duties with effect from 12/11/2009 to up till now. And Show cause notices already served vide this Office Show cause notice no. 300-312 Dated 22-2 /2010 about your long absence, but your reply has not been received after expire of due date and you Filed to proof their innocent.

You are once again directed/ given a final chance to submit your reply about their absenteeism and attend this Office for personal hearing with in 10- days after the issuing of this litter, otherwise disciplinary action should be taken against you under special ordinance 2000 are disciplinary action 1973 (Removal from service)

S/N	Name of Teacher	Name of School		Remarks
1	Zaibul Haram	GGPS	Shatail	You have not submitted the reply of Show cause notice after expire due date.
2	Farzana Kiran	GGPS	Bela Dubair	-do-
3	Naheed Begum	GGPS	Gabeer Ranolla	-do-
4	Nusrat Begum	GGPS	-do-	-do-
5	Fozia Kawal	GGPS	Bela Dubair	-do-
6	Yasmin Khan	GGPS	-do-	-do-
7	Hussan Bano	GGPS	Kayal Village	-do-
8	Noteena Bibi	GGPS	Suliman Abad	-do-
9	Naila Fareed	GGPS	Qanmar Band	-do-
10	Sartaj Bibi	GGPS	Haydar Abad	-do-
11	Sadaf Afzal	GGPS	Khat Karin	-do-
12	Bibi Ruqia	GGPS	Samana Abad	-do-

Sd/-
Executive District Officer
(E&SE) Kohistan

Encls: No 415-20 Dated Kohistan the 1-5 /2010

Copy of the above is forwarded to the:

1. PA to Director E&SE Khyber Pukhtonkhuwa Pashawar.
2. District Co-ordination Officer District Kohistan.
3. District Accounts Officer District Kohistan.
4. District Officer (F) E&SE Kohistan.
5. Deputy District Officer (F) E&SE Kohistan.
6. All Teachers concerned.

Arshad
Executive District Officer
(E&SE) Kohistan

[Signature]
District Education Officer
(Female) Kohistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.963/2012

Nusrat BegumAppellant

Versus

The EDO and others.....Respondents

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO REPLY FILED BY RESPONDENTS NO.1-4.**

Respectfully Sheweth,

Preliminary Objections:

Preliminary objections raised by answering respondents are erroneous and frivolous. Appellant has got strong cause of action and for that matter locus standi to prefer the instant appeal. Appellant has approached the Hon'ble Tribunal with clean hands and moreover, estoppel does not run against the law. The appeal is within time and based upon sound grounds.

Facts:

1. Being admitted as correct needs no further clarification.
2. Incorrect. The salary of the appellant was withheld malafide. Appellant has never remained absent from duty and the so-called complaint is an afterthought to deprive the appellant from his service. No inquiry has been conducted nor the appellant has been apprised of any such inquiry. The extracts from the Attendance Register are based on facts.

3-5. Incorrect. Paras-3 to 5 of the appeal have not been replied which amounts to admission. Moreover, numerous terminated teachers were subsequently reinstated on preferring the departmental appeal vide orders dated 04.07.2012, 15.08.2012 and 15.08.2012 (*Annex:-Rj/1*). Appellant was subsequently transferred to GGPS Doghalgay Biha, Swat vide orders dated 14.06.2012 and 16.04.2012 (*Annex:-Rj/2*). On her transfer to Swat, appellant took over the charge at the concerned School vide Dispatch No.797 dated 12.04.2012 (*Annex:-Rj/3*). Her initial appointment order and Charge Report (*Annex:-Rj/4*). Since the LPC of the appellant was not released for which appellant repeatedly approached but invain and finally the impugned order was allegedly passed/issued.

Grounds:

- A. Incorrect. The impugned order is against the law and has rightly been challenged.
- B. Incorrect. The impugned order is malafide and has been subsequently fabricated to deprive the appellant from her service.
- C. Incorrect. Being a regular employee, appellant could not be terminated in a slipshod manner. The impugned order is the result of colourable exercise of power and as such is not sustainable. No Show Cause Notice has been issued to the appellant nor any inquiry is known to her. The entire action purportedly taken is an afterthought for defending the appeal while in fact no such proceedings have been taken.
- D. Incorrect. No Show Cause Notice has been issued to the appellant. No inquiry has been conducted against the appellant

nor was she provided the opportunity of defence. The impugned order has been issued without conforming to the codal formalities, therefore, is not sustainable.

E&F. Incorrect hence denied.

It is, therefore, humbly prayed that the reply of answering Respondents No.1-4 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

Khaled
Khaled Rahman
Advocate, Peshawar

Dated: 11 /03/2015

Affidavit

I, Khaled Rahman Advocate, as per instructions of my clients, do hereby affirm and declare on oath that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

ATTESTED



5

OFFICE OF THE
DISTRICT COORDINATION OFFICER,
KOHISTAN
No. 21-Estt. / _____ / DCO (KH)

Dated Dassu the 25/8/2012

OFFICE ORDER.

Following Teachers of Elementary & Secondary Education Department Kohistan lodged appeals in this office against their termination orders issued by the EDO E&SE Kohistan. Their appeals are accepted and they are hereby reinstated in service with immediate effect, the intervening period i.e. from the date of termination to 14.8.2012 is treated as extra ordinary leave with out pay :-

1. Rubina Shams Ct. GGMS Gul Bagh
2. Tabassam Shaheen CT GMS MAidan Kolai
3. Hussain Faras PST GGPS Khel Khandia
4. Riffat Shaheen PST GGPS Suleman Abad.
5. Saddam Akbar PST GGPS Jalkot
6. Hifsa Yousif PST GGPS Dagg Pattan
7. Sobia Bostan CT GGMS Majdan Kolai
8. Nageena PST GGPS Amiz Abad Pattan
9. Rehina PST GGPS Amiz Abad
10. Lubna Jdn PST GGPS Dassu
11. Zareena PST GGPS PS Bar Kelly Ranolia
12. Rukhsana PST GGPS PS Bar Kelly Ranolia
13. Fozia Salwar PET GMS Jalkot.
14. Nazmeeh PST GGPS Kero

10 PST

District Coordination Officer
Kohistan.

End: No. 6741-44

- Copy forwarded for information and necessary action to the
1. Director, Officer Elementary & Secondary Education Department Kohistan.
 2. Executive Officer F&P Deptt Kohistan with reference to this memo No.5325 dated 14.8.2012
 3. District Accounts Officer Kohistan.
 4. Appellants concerned, for information.

District Coordination Officer
Kohistan

6



OFFICE OF THE
DISTRICT COORDINATION OFFICER,
KOHISTAN
No. 21-Estt: / 7375 /DCO (KH)

Dated Dassu the 27 /9/2012

To,

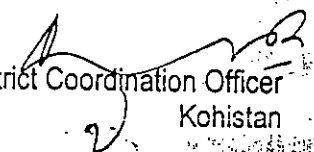
Executive District Officer,
E&SE Kohistan.

Subject

APPLICATION SUBMITTED BY BIBI RUQIA PST, ZAIB UL HARRAM PST, NUSRAT
BEGUM PST

Memorandum:

An application alongwith its enclosure submitted by subject mentioned PST,
teachers is sent herewith for detail comments and report at the earliest.


District Coordination Officer
Kohistan
27/9



7

OFFICE OF THE
DISTRICT COORDINATION OFFICER,
KOHISTAN
No. 21-Estt: / / /DCO (KH)

Dated Dassu the / / 8/2012

OFFICE ORDER.

Following Teachers of Elementary & Secondary Education Department Kohistan lodged appeals in this office against their termination orders issued by the EDO E&SE Kohistan. Their appeals are accepted and they are hereby reinstated in service with immediate effect, the intervening period i.e. from the date of termination to 14.8.2012 is treated as extra-ordinary leave with out pay.

S.No.	Name & designation	Name of School	No. & date of Termination order	Remarks
1.	Naheeda Bibi PST	GGPS Dobair Village	568-71 dated 21.3.2011	
2.	Zakia PST	GGPS Gabber Ranolia	572-75 dated 21.3.2011	
3.	Noreena PST	GGPS Badshe	584-87 dated 21.3.2011	
4.	Tahira Jalil PST	PST GGPS Mareen Kolai	589-91 dated 21.3.2011	
5.	Phool-Bibi PST	GGPS Jandar Kot.	5011-15 dated 1.10.2010	
6.	Salma Ahmed PST	GGPS Ghatbeer Pattan	5011-15 dated 1.10.2010	
7.	Rabia Saeed PST	GGPS Daleel Abad	5011-15 dated 1.10.2010	
8.	Habib un Nisa PST	GGPS Shydia	5011-15 dated 1.10.2010	
9.	Lateefa Bibi PST	GGPS Hardan	576-79 dated 21.3.2011	
10.	Nabeela Qurashi PST	GGPS Badakot	584-87 dated 21.3.2011	
11.	Humma Anwar PST	GGPS Bar Choorak	580-83 dated 21.3.2011	
12.	Rehana Shamal PST	GGPS Banjar Yanjool	584-87 dated 21.3.2011	
13.	Shahmin Akhter PST	GGPS GGPS Paragan.	589-91 dated 21.3.2012	
14.	Aishan Hayat	GGPS Mujawar Abad	600-604 dated 21.3.2012	
15.	Jeena Hayat	GGPS Kolal	580-83 dated 21.3.2012	
16.	Bushra Hayat	GCMS Shalkhan Abad	5011-15 dated 1.10.2010	
17.	Mst Zumard PST	GGPS Sheshal Kayal	2342-48 dated 4.7.2010	
18.	Mst Rang Mahal PST	GGPS Bar Komila	2342-48 dated 4.7.2010	
19.	Hussan Pari PST	GGPS Saad Abad Dahar	576-79 dated 21.3.2011	
20.	Mst. Kiran Mustafa	GGPS Sabat Abad	572-75 dated 20.10.2011	
21.	Naila Bibi PST	GGPS Bad Kot	576-79 dated 21.3.2011	
22.	Rehan Yousaf	GGPS Jijal	1469-74 dated 10.05.2010	

District Coordination Officer
Kohistan.

22 +
10
32 pst
End: No. 6738-40

- Copy forwarded for information and necessary action to the
- Executive District Officer, Elementary & Secondary Education Department Kohistan.
 - District Accounts Officer Kohistan.
 - Appellants concerned, for information.

District Coordination Officer,
Kohistan

8

ANNEX R0/2

Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar.
No. 1800 /F.No.99/IDT/PST(F) Swat.
Dated Peshawar the 14/6/2012.

To

The Executive District Officer,
E&SE, Swat.

Subject:

INTER DISTRICT TRANSFER OF PST (FEMALE)

Memo:

I am directed to refer to your letter No.436 dated 16-04-2012 on the subject cited above and to state that the following PSTs (Female) have been transferred from District Kohistan to District Swat on the basis of their domicile as well as recommendations of local MPAs of District Swat/approval of Honourable Minister for E&SE Khyber Pakhtunkhwa and in the light of post availability report provided by your office duly verified by the D.O. (Female) (Copy attached).

Slt	Name of teacher	From	To	Date of transfer
1.	Mst. Nasima Khan PST	GGPS Seglo Kohistan	GGPS Mian Kalay Tajarri Swat	22-02-2012
2. ✓	Mst. Nusrat Begum PST	GGPS Dadeer Jumra Kohistan	GGPS Daghalgay Biha Swat	-do-
3	Mst. Naheed Bibi PST	GGPS Dachi Kohistan	GGPS Qayyum Abad Swat	03-03-2012
4	Mst. Azra Bibi PST	GGPS Jalkot Kohistan	GGPS Dnadanai Swat	-do-
5	Mst. Nuzhat Bano PST	GGPS Thooti Kohistan	GGPS Mandoor Swat	22-02-2012
6	Mst. Farzana Kiran PST	GGPS Bala Dubair Kohistan	GGPS Awishali Swat	22-0-2012

In this regard I am further directed to ask you to adjust the above named PSTs under transfer from District Kohistan to your respective District against the newly created posts/posts occurred due to retirement or remain vacant from appointment due to non availability of qualified candidate in various Union Council being domicile holders of District Swat under intimation to all concerned.

for Deputy Directress (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

R/2

Regd No 5620

Reg

9

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION SWAT

No. **436** /Inter District Transfer/PST

Dated **16/4/2012**

To

The Director
Elementary and Secondary Education
Khyber Pukhtun Khwa Peshawar

Subject: **INTER DISTRICT TRANSFER OF PST (F)**

Memo:

It is submitted for your kind information that the following PST Female transferred to District Swat vide your office No. and dated mentioned against their names.

S. No	Name & Designation	From	To	No & Date
1	Mst. Nasima Khan PST	GGPS: Seglo Kohistan	GGPS: Mian kalay Tajarry SWat	2160-66/22.02.20
2 ✓	Mst. Nusrat Begum PST	GGPS: Dadeer Jamra Kohistan	GGPS: Doghalgay Biha Swat	2160-66/22.02.20
3	Mst. Naheed Bibi PST	GGPS: Dachi Kohistan	GGPS: Qayum Abad Swat	598-603/03.03.20
4	Mst. Azra Bibi PST	GGPS: Jalkot Kohistan	GGPS: Dnadanai Swat	592-97/03.03.201
5	Mst. Nuzhat Bano PST	GGPS: Thoori Kohistan	GGPS: Mandoor Swat	2153-59/22.02.201
6	Mst. Farzana Kiran PST	GGPS: Bila Dubair Kohistan	GGPS: Awishah Swat	2153-59/22.02.201

In this connection it is added that these PST posts have already been advertised and the recruitment is under process and the merit list of eligible female candidates has been made and is near to completion. If these transfer orders are implemented they will disturb the Union Council wise PST seats and will create endless problem for this office.

It is therefore requested that the above transfer orders may kindly be withdrawn in the best interest of public service please.

596
19/4/12
PST Female

EXECUTIVE DISTRICT OFFICE
ELEMENTARY AND SECONDARY
EDUCATION SWAT

Answer R/3

صالح

جاری

23/2/2012 قبل از درسیں
 22/2/2012 میں
 GG کا مکمل جاری
 23-2-012

Amina Bibi

Govi Girls Primary School, Doshalgay, Distt. Swat

23-2-012

APPOINTMENTS ORDER ON MERIT (UN-TRAINED)

Anwar R/S/4

Consequent upon the screening test and interview held from 10 to 12/10/1999 and after proper verification of testimonials/certificates from the concerned Boards/Institutions, the appointments of the following P.T.O (Un-trained) candidates of District, Shikringa, are hereby ordered purely on merit basis in DPS-7 (Rs. 1080/- PM fixed) plus usual allowances as admissible under the rules, in the schools noted against their names.

The appointments are purely according to the policy/procedure of the department and are in the interest of public service w.o.f their taking over charges-

Sl. No.	Name.	Father's Name	Residence	School	Remarks
1.	Shahzad Malik	Chaman	Swat G.P.S	Dadir	Agasty Post
2.	Nusrat Begum ✓	Mohammed Amin	Swat	Seri Ghoral	do
3.	Anjum Begum	Hedayatullah	Chah Bada	Dadir Jaura	do
4.	Rohi Gul	Hedayatullah	Chah Bada	Mughal Abed	do
5.	Nahida Bibi	Habib Khan	Swat	do	do
6.	Farzana Karam	Wali Mohammad	Swat	Budakot	do

- Note
1. Charge reports should be submitted to all concerned.
 2. No.TA/DA is allowed to any one.
 3. Their services are purely temporary and are liable to be termination at any time without assigning any reasons.
 4. Their age should not be below 18 and above 45 years.
 5. They should produce their age and health certificate from DRO Kohistan.
 6. Their appointments will be considered as cancelled if they failed to take over charge within 15 (fifteen) days after the issue of this order.
 7. They will be governed by the service rules and regulations as prescribed by the department from time to time.
 8. The teachers who are appointed in the schools, which are going to be closed for long winter vacations, are not allowed for salaries during the vacation.
 9. In case of person appointed as an untrained teacher, will have to pass the requisite training Examination within a period of 4 years failing which service will be terminated.
 10. Pure merit is ensured in all respects, even then any cause, minor or major detected at any time will be accepted by the concerned teachers accordingly.

(MALIK ABDURRAHMAN) 27/12/99
 DISTRICT EDUCATION OFFICER
 (N&F) PRIMARY KOHISTAN AT DASSU.

Endat. No. 775-911 Dated Dassu the 27-12-1999.
 Copy of the above is forwarded for favour of information and necessary action to the:-

1. F.A to Secretary to Government of NWFP, Education Dept. NWFP.
2. F.A to Director Primary Education NWFP, Peshawar.
3. Deputy Commissioner, Kohistan.
4. Commanding Officer MIT Circuit House, Dassu.
5. District Accounts Officer, Kohistan.
6. Sub Divisional Officer (Female) Peshawar.
7. All the concerned for compliance accordingly.
8. C.O. File.

(MALIK ABDURRAHMAN) 27/12/99
 DISTRICT EDUCATION OFFICER
 (N&F) PRIMARY KOHISTAN AT DASSU.

R/S/5

OFFICE OF THE DISTRICT COORDINATION OFFICER
DISTRICT KOHISTAN

13

ACCEPTANCE OF APPEAL/RELEASE OF PAY

Consequent upon acceptance of appeal in the light of findings/ recommendation of in charge Deputy District Officer Female (S&L) Kohistan, The pay of the following Female teachers is hereby released with immediate effect/ with effect from taking over charge in the newly adjusted school.

They are hereby adjusted in the schools noted against their names to make the schools functional the intervening period is hereby declared as leave with out pay and no arrears of pay is allowed.

NOTE

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.
3. Intervening period is hereby declared as leave with out pay and entry in this effect should be given in their service books.

S.No	Name & Designation	From	To	Remarks
1	Anjuman Begum PTC	GGPS Dadeer	GGPS Seglao	Against vacant post to make the school functional
2	Romi Gull PTC	GGPS Mughal Abad	GGPS -do-	-do-
3	Naheed Begum PTC	GGPS Mughal Abad	GGPS Dachl	-do-
4	Shaheen Bibi PTC	GGPS Dadeer	GGPS -do-	-do-
5	Musrrat Bibi PTC	GGPS Dadeer Jhamra	GGPS Bela Dubair	-do-
6	Farzana Kiran PTC	GGPS Bella Dairat	GGPS Bela Dubair	-do-
7	Zumard Bibi PTC	GGPS Thoti	GGPS Shusha Nayal	-do-
8	Bakht Zareen PTC	GGPS -do-	GGPS -do-	-do-
9	Rang Mahal PTC	GGPS Sec V Sere	GGPS Jalkot V	-do-
10	Huwal Begum PTC	GGPS Gaural	GGPS Jandak Kot	-do-

DISTRICT COORDINATION OFFICER
KOHISTAN

Exdt: No: 8835-39 / Dated 11/9/2006.

- Copy of the above is submitted:
1. PS to Minister of Education NWFP.
 2. PA to Director (S&L) NWFP, Peshawar.
 3. District Nazim Kohistan.
 4. EDO Schools & Literacy Kohistan.
 5. District account officer Kohistan.

DISTRICT COORDINATION OFFICER
KOHISTAN

چارچ رپورٹ

14

EDO Education & Litarcy Distt: Kohistan سب الحکم جناب

11/9/06 مورخہ 8835-39/DCO Adhuni
تعمیری آرڈر

کی تعمیل آج مورخہ 22-9-06 کو قبل از دوپہر گورنمنٹ
GGPS

PSF میں اپنی منصب نشنت Dachi
کا چارج سنبھال کر ڈیوٹی کا باقاعدہ

آغاز کر دیا ہے۔

چارچ دہندہ

چارچ گرہندہ

تفصیلات
4/4 کیفیت اللہ

تفصیلات

Haji Gul Sherif
GENERAL COUNCIL
Kohistan

(K) (B)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION KOKHISTAN**

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer (Female) Elementary & Secondary Education, Kohistan, the Service of the following Female PTC (teachers) are hereby terminated due to prolong absent from their duties under special power ordinance 2001 on disciplinary Ground with immediate effect in the interest of public service.

S. #	Name of Teacher	School	Absent Period From 12/11/2009	Remark
1	Farzana	GGPS Bela Dubair		Terminated from Service
2	Naheed Begum	GGPS Gabair Barolia		do
3	Nusrat Begum	do	do	do
4	Fozia Karwal	GGPS Bela Dubair	do	do
5	Yasmin Khan	GGPS Bela Dubair	do	do
6	Zaib-ud-Darain	GGPS Shatal	do	do
7	Hussain	GGPS Koyal Village	do	do
8	Noreena	GGPS Sulemanabad	do	do
9	Naila Farooq	GGPS Qamar Band	do	do
10	Sartaj	S Hayderabad	do	do
11	Sadat	S Khatt Karin	do	do
12	Bibi Ruzia	GGPS Samad Abad	do	do

Sd
Executive District Officer
(E & S) Education Kohistan

Encl: No. 22/6-10

Dated Kohistan the 1-6/2009

- Copy of the above is forwarded to the:-
1. PA to Director Elementary & Secondary Education Department KPK Peshawar
 2. District Officer Kohistan
 3. District Accounts Officer Kohistan
 4. Dy. District Officer (E & S) Kohistan

hussain
Executive District Officer
(E & S) Education Kohistan

Shiraz
Amir
District Education Officer
(Female) Kohistan