

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR
AT CAMP COURT ABBOTTABAD.

Service Appeal No. 7414/2021

Date of Institution ... 14.09.2021

Date of Decision ... 24.02.2023

Mst. Nabeela Arif D/O Muhammad Arif, (Ex-Arabic Teacher), R/O
Chappargram, Tehsil & District Battagram.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Elementary & Secondary
Education, Peshawar and 02 others.

... (Respondents)

MR. HAMAYUN KHAN,
Advocate

--- For appellant.

MR. ASIF MASOOD ALI SHAH,
Deputy District Attorney

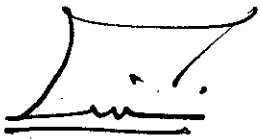
--- For respondents.

MR. KALIM ARSHAD KHAN
MR. SALAH-UD-DIN

--- CHAIRMAN
--- MEMBER (JUDICIAL)

JUDGMENT:


SALAH-UD-DIN, MEMBER:- Precisely stated the facts surrounding the instant service appeal are that the appellant was appointed as Arabic Teacher on 04.07.2009 and she assumed the charge of her post in Government Girls Middle School Seer Ghaziabad District Kohistan. During the course of service, she remained posted in various schools and performed her duty. Departmental action was taken against the appellant on the allegations of her absence from duty with effect from 04.03.2017 and on conclusion of the inquiry, she was removed from service vide order dated 30.05.2018. The appellant



challenged the order of her removal through filing of departmental appeal, however the same was not responded within the statutory period, hence the instant service appeal.


2. On admission of the appeal for regular hearing, notices were issued to the respondents, who contested the appeal by way of filing of reply, wherein they refuted the assertion raised by the appellant in his appeal.

3. Learned counsel for the appellant has addressed his arguments supporting the grounds agitated by the appellant in his service appeal. On the other hand, learned Deputy District Attorney for the respondents has controverted the arguments of learned counsel for the appellant and has supported the comments submitted by the respondents.

 4. We have heard the arguments of learned counsel for the parties and have perused the record.

5. According to the available record, the appellant was issued charge sheet as well as statement of allegations on 25.04.2018 and Tahira Bibi ASDEO (F) Battagram was appointed as Chairman, while Aliya Bibi Head SST (G) GGHS Banian was appointed as Member of the inquiry committee for conducting inquiry against the appellant. Charge sheet as well as statement of allegations were required to be served upon the appellant for enabling her to submit reply to the same and make her defence. However, the copies of charge sheet and statement of allegations so annexed by the respondents with their

comments would show that the same were served on a Sweeper namely Ihsan-ul-Haq. The report of the inquiry committee as available on the record also does not show that any effort was made by the inquiry committee for intimating the appellant regarding the inquiry initiated against her. Another interesting aspect of the matter is that as per statement of allegations, the inquiry committee was constituted for inquiry in the matter on 25.04.2018, while the report so submitted by the inquiry committee bears its date of drafting as 14.04.2018. The inquiry committee has thus submitted its report prior to issuing of charge sheet as well as statement of allegations on 25.04.2018.



6. According to charge sheet as well as statement of allegations, disciplinary action was taken against the appellant on the allegations of misconduct and habitual absence from duty. However, it appears from the contents of impugned Notification dated 30.05.2018, whereby the appellant was removed from service, that the appellant was removed from service on account of willful absence. The procedure for taking disciplinary action against an employee on account of willful absence has been laid down in Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. The said rule provides that in case of willful absence from duty by a government servant for seven or more days, a notice shall be issued by the competent Authority through registered acknowledgement on his home address directing him to resume duty within fifteen days of issuance of the notice and if the same is received back as undelivered or no response was received from the


absentee within stipulated time, a notice shall be published in at least two leading newspapers directing him to resume duty within fifteen days of the publication of that notice, failing which an ex-parte decision shall be taken against the absentee. In the instant case, the respondents have filed to show that any notice through registered acknowledgement was issued to the appellant on his home address. Similarly, notice through publication has been made only in one newspaper. The respondents have thus even failed to comply the procedure as provided in Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. On going through the record, we have come to the conclusion that the respondents had proceeded against the appellant in haphazard manner without complying the legal requirements, therefore, the impugned order of removal of the appellant is not sustainable in the eye of law.

7. Consequently, the appeal in hand is accepted by setting-aside the impugned order and the appellant is reinstated in service. The absence period with effect from 04.03.2017 as well as the intervening period shall, however be treated as extra-ordinary leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
24.02.2023



(KALIM ARSHAD KHAN)
CHAIRMAN
CAMP COURT ABBOTTABAD



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

ORDER
24.02.2023

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Abdul Hafeez, ADEO for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is accepted by setting-aside the impugned order and the appellant is reinstated in service. The absence period with effect from 04.03.2017 as well as the intervening period shall, however be treated as extra-ordinary leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
24.02.2023



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad



(Salah-Ud-Din)
Member (Judicial)
Camp Court Abbottabad

15th Dec, 2022

Nemo for the appellant. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Abdul Hafeez, ADEO for the respondents present.

Counsel are on strike. To come up for arguments on 24.02.2023 before the D.B at Camp Court Abbottabad.

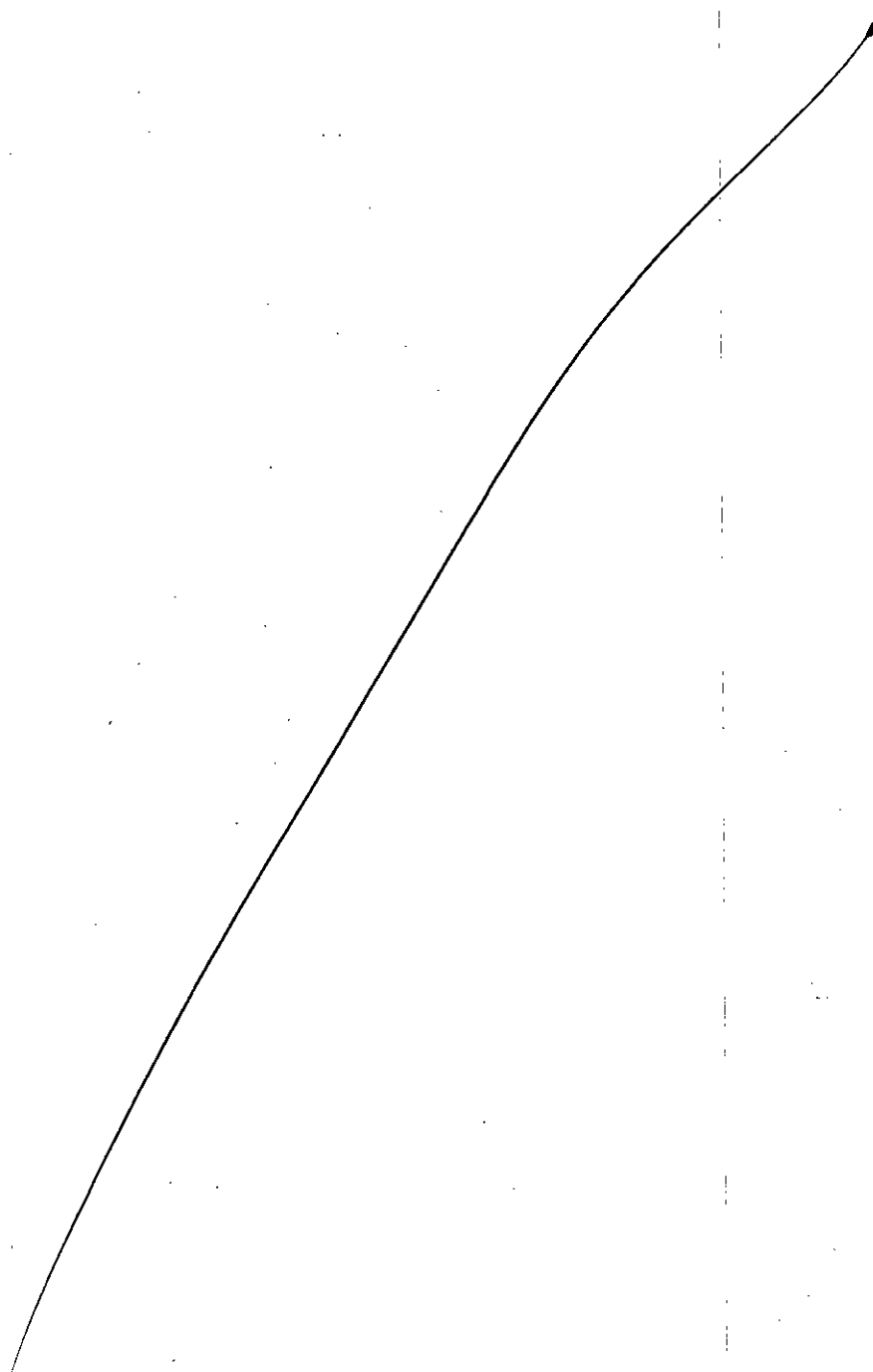
**SCANNED
KPST
Peshawar**



(Salah Ud Din)
Member (Judicial)
Camp Court Abbottabad



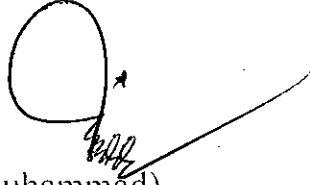
(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad



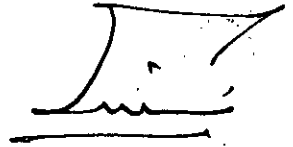
17.10.2022

Nemo for the appellant. Ms. Sajida Sakhi, SDEO (F) and Mr. Yar Muhammad ADEO alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issue to the appellant as well as her counsel through registered post and to come up for arguments on 18.11.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)


**SCANNED
KPST
Peshawar,**

18th Nov 2022

None for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Yar Muhammad, ADEO for respondents present.

*Counsel was
informed telephonically
on 8/12/22*

Fresh notices be issued to the appellant and his counsel. To come up for arguments on 15.12.2022 before D.B at camp court Abbottabad.



(Salah Ud Din)
Member (Judicial)



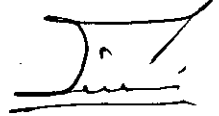
(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

**SCANNED
KPST
Peshawar**

21.04.2022

Learned counsel for the appellant present. Mr. Taj Malook, ADO (Litigation) alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Joint para-wise comments on behalf of respondents submitted, which are placed on file and copy of the same handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 15.06.2022 before the D.B at Camp Court Abbottabad.



(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

15.06.2022

Appellant present through counsel.

Noor Zaman Khan Khattak, learned District Attorney alongwith Yar Muhammad ADEO for respondents present.

Former requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 15.08.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)
Member (E)
Camp Court, A/Abad



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

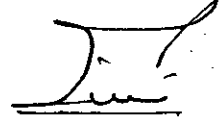
15.8.22

Due to summer vacation the case is adjourned to 17-10-22 for the same



21.12.2021

Clerk of learned counsel for the appellant present and stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned. To come up for preliminary hearing on 19.01.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

19.01.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 21.04.2022 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

24/01/22



(Rozina Rehman)
Member (J)

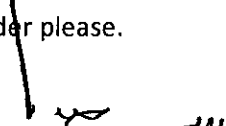


Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7414 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/09/2021	<p>The appeal of Mst. Nabeela Arif received today by registered post through Mr. Hamayun Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	08.11.2021	<p>This case is entrusted to S. Bench at Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>08/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Nemo for the appellant.</p> <p>Lawyers on general strike today. Instant appeal pertains to the territorial limits of Hazara Division. To come up for preliminary hearing on 21.12.2021 before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> Chairman</p>

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Mst Nabeela Aij
..... Appellant

Versus

Court of Appeal
..... Respondents

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

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

Name:- *Hamayun Iqbal*

Signature:- *H Iqbal*

Dated:- *10-9-2021*

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

SCANNED
K-03T
Peshawar

Appeal No. _____ /2021

Mst. Nabeela Arif daughter of Muhammad Arif, (Ex-Arabic Teacher),
resident of Chapagram, Tehsil & District Battagram.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Elementary & Secondary
Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

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5.	Copy of application	23-27	"B"
6.	Copy of impugned order	28	"C"
7.	Copy of departmental appeal	29-30	"D"
8.	Wakalatnama	31	

...APPELLANT

Through

Dated: 10/19 /2021


(FAZLULLAH KHAN)

&


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 7414 /2021

Mst. Nabeela Arif daughter of Muhammad Arif, (Ex-Arabic Teacher),
resident of Chappargram, Tehsil & District Battagram.

...**APPELLANT**
Khyber Pakhtukhwa
Service Tribunal

VERSUS

Diary No. 7577
Dated 14/9/2021

1. Government of Khyber Pakhtunkhwa through Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female), Battagram.

...**RESPONDENTS**

Filed to-day
Registrar
14/9/2021

APPEAL UNDER ARTICLE 212 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 READ WITH SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
1974, AGAINST THE IMPUGNED ORDER DATED
30.05.2018 PASSED BY RESPONDENT NO. 3,
WHEREBY RESPONDENT NO. 3 IMPOSED MAJOR
PENALTY OF REMOVAL FROM SERVICE OF

APPELLANT WITH EFFECT FROM 04.03.2017,
WHICH IS ILLEGAL, AGAINST THE LAW,
AGAINST THE FACTS, NATURAL JUSTICE AND
LIABLE TO BE SET-ASIDE.

PRAYER: ON ACCEPTANCE OF INSTANT
SERVICE APPEAL IMPUGNED REMOVAL FROM
SERVICE ORDER DATED 30.08.2018 MAY
GRACIOUSLY BE DECLARED NULL AND VOID
AND SET-ASIDE AND APPELLANT BE RE-
INSTATED IN SERVICE WITH ALL BACK
BENEFITS. ANY OTHER RELIEF WHICH
HONOURABLE TRIBUNAL DEEM FIT AND
PROPER IN THE INTEREST OF JUSTICE AND FAIR
PLAY.

Respectfully Sheweth;-

Appellant beg to solicit through instant appeal on the
following legal and factual back grounds:-

1. That initially appellatant was appointed as Arabic
Teacher on 07.04.2009 at District Kohistan after

completion of legal and codal formalities.

Thereafter appellant was posted at Government Girls Middle School Sehri Ghazikot Kohistan.

2. That thereafter, appellant assumed charged in said school and continuously performed duty and liabilities in District Kohistan.
3. That on 07.04.2011, respondent No. 2 issued transfer order and whereby appellant was transferred from District Kohistan to District Battagram.
4. Consequent upon transfer order dated 07.10.2010 appellant was posted at Government Girls Middle School High School Chohan Battagram.
5. That thereafter, appellant submitted her arrival report in the said school and continuously join the duty.
6. That thereafter, appellant was transferred from GGMS Chohan Battagram to GGMS Nelishung Battagram and thereafter on 31.08.2014 appellant was transfer to GGMS Baikhail Pagora, whereby

appellant performed her duty with full devotion and liability. Copy of service book is annexed as Annexure "A".

7. That thereafter respondent No. 3 verbally issued directions to the appellant that she had transferred to GGHS Tikri Khorian Battagram and submit her arrival report in the said school.
8. That on the direction of respondent No. 3 appellant went GGHS Tikri Khorian for arrival and duty. Principal/ Headmistress of the said school refused to receive arrival report and stated that they have not received such kind of transfer order from the office of respondent No. 3 and they have not any vacant post of A.T Teacher.
9. That on 05.10.2016 appellant visited the office of respondent No. 3 and discussed issue of transfer with him. Respondent No. 3 again verbally stated she has transferred to GGHS Ajmera Battagram and directed to assumed the charge in the said school within two days.

10. That on the very next day, appellant went to GGHS Ajmera Battagram for arrival as well as duty, In-charge of the said school refused arrival report and stated they have not received transfer order in written.
11. That at on the same day appellant again went to the office of respondent No. 3 for written transfer order but respondent No. 3 refused the same, and stated that your name is in the waiting list for further posting hence wait for further posting and within week you will receive transfer order.
12. That after two months appellant visited the office of respondent No. 3 for ascertained actual situation but respondent No. 3 restrained the appellant, but respondent No. 3 and official staff of the office concealed all actual situation.
13. That thereafter, appellant filed applications before the respondents and other officers for redressal of her grievances, but till date they have not removed grievances of the appellant. Copy of application is annexed as Annexure "B".

14. That on 05/05/2021 appellant unofficially received the impugned order from the office of respondent No. 3 after many request subject to condition that she will not disclosed name of the said official. Copy of impugned order is annexed as Annexure "C".
15. That on 20.05.2021 appellant preferred departmental appeal before the respondent No. 2. Copy of departmental appeal is annexed as Annexure "D".
16. That till date respondent No. 3 not passed any order on the said appeal and similarly not given any response on the same. Hence this appeal filed, inter-alia on the following grounds;

GROUND:-

- a. That, the impugned order is illegal, against the law & facts, hence is liable to be set aside.
- b. That, impugned order is based on personal grudges and interests which is not sustainable in the eye of law.

- c. That impugned order passed by the respondent No. 3 without lawful justification, authority, hence liable to be set-aside.
- d. That, impugned order is against the rules, no regular inquiry was conducted nor the opportunity of defence and hearing was given to the appellant.
- e. That till 05/05/2021 respondent No. 3 not delivered / handed over the impugned order to appellant and issued the so-called order without any reason.
- f. That it is clear malafide of the respondents that first they restrained/ abstained appellant from performing duty without any black and white and later on 05/05/2021 delivered impugned order by the official of respondent No. 3.
- g. That respondent issued impugned order for adjustment of his persons on the same post.

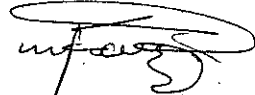
- h. That impugned order passed without communication and association of appellant, hence, liable to be set-aside.
- i. That, all the proceeding conducted by respondent No.3 is clear violation of E&D rules and issued impugned order for obtaining his immoral goals, in this respect appellant filed complaint before learned ombudsman for protection of her honor and dignity.
- j. That, the act of respondent is against guaranteed constitutional rights of the appellant, which are also against the norms and dictates of Islam.
- k. That, impugned order is issued in a hasty manner, which did not fulfill the codal requirement, hence having no legal value, is liable to be struck down.
- l. That other points would be argued at the time of argument with the kind permission of this Honourable Court.

It is, therefore humbly prayed that on acceptance of instant service appeal impugned order dated 30.08.2018 may graciously be declared null and void and set-aside and appellant re-instated in service with all back benefits. Any other relief which Honourable Tribunal deem fit and proper in the interest of justice and fair play.


...APPELLANT

Dated: 10/9 /2021

Through


(FAZLULLAH KHAN)

&


(HAMAYUN KHAN)

Advocates High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____ /2021

Mst. Nabeela Arif daughter of Muhammad Arif, (Ex-Arabic Teacher),
resident of Chapalgram, Tehsil & District Battagram.

...APPELLANT

VERSUS

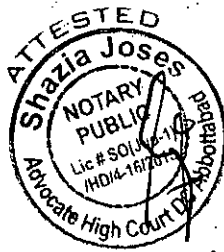
Government of Khyber Pakhtunkhwa through Elementary & Secondary
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...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Mst. Nabeela Arif daughter of Muhammad Arif, (Ex-Arabic Teacher),
resident of Chapalgram, Tehsil & District Battagram*, do hereby solemnly
affirm and declare that the contents of foregoing appeal are true and correct
the best of my knowledge and belief and nothing has been concealed from
this Honourable Tribunal.



10/9/2021

Nabeela Arif
...DEPONENT

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____ /2021

Mst. Nabeela Arif daughter of Muhammad Arif, (Ex-Arabic Teacher),
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Government of Khyber Pakhtunkhwa through Elementary & Secondary
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...RESPONDENTS

SERVICE APPEAL

**APPLICATION FOR CONDONATION OF DELAY IF
 ANY.**

Respectfully Sheweth;-

1. That the above titled appeal is being filed before this Honourable Tribunal and contents of the same may kindly be treated as integral part of this application.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favour of the appellant.

3. That the impugned order received on 05.05.2021 from the office of respondent No.3 and respondent No. 3 intentionally did not deliver and inform the appellant from actual situation.
4. That it is well known principle of law and natural justice appeal does not run against void order.
5. That delay in filing of service appeal is not willful.
6. That valuable rights of appellant are involved.

It is therefore, humbly requested that the delay if any may kindly be condone in the interest of justice.


...APPELLANT

Through

Dated: 10/9 /2021

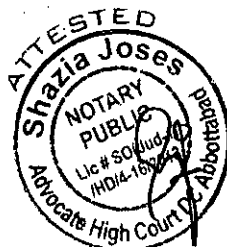

(FAZLULLAH KHAN)

&


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



10/9/2021

...APPELLANT

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. _____ /2021

Mst. Nabeela Arif daughter of Muhammad Arif, (Ex-Arabic Teacher),
resident of Chapagram, Tehsil & District Battagram.

...APPELLANT

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Government of Khyber Pakhtunkhwa through Elementary & Secondary
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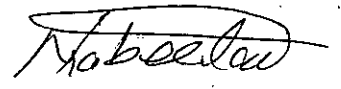
...RESPONDENTS

SERVICE APPEAL

CERTIFICATE

Certified that no service appeal has earlier been filed by the appellant
on the subject.

It is further certified that notice of service appeal alongwith grounds
of service appeal has been dispatched to the respondents.



...PETITIONER

Through

Dated: 10/9 /2021.


(HAMAYUN KHAN)

&

(FAZALULLAH KHAN)

Advocates High Court Abbottabad

(For use in Police Department only).

ANNEXURE "A"

141

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. _____ dated _____ received back _____

Left Thumb Impression

1- Passed S.S.C. Exam from BISE
 Abbottabad Under Roll No. 34025
 Qualification Scoring 177/375 marks during
 Session 2007.

English

Executive District Officer
 (E&S) Edu: Kohistan

First Arts

2- Passed Shahadat ul Alim from
 Pushto Wafaq ul Madaris Multan
 Under Roll No. 0059 Scoring 344/600
 Mark. during 2007.
 Urdu

B.L. or B.A.

Pleadership examination

Executive District Officer
 (E&S) Edu: Kohistan

Plan-drawing

Training School Final examination

3. Passed Shahadat ul Alim Exam
 from Wafaq ul Madaris Multan
 Finger Print Under Roll No. 7099 Scoring
 244/600 Marks during 2008

Other qualifications

Drill Instructing

Executive District Officer
 (E&S) Edu: Kohistan

Court Duties

Reserve Duties

Attest

m

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.

15

Name: MST. NABILA

Race: SWATI

Residence: VILL: 4 P.O. Chappengram Tehsil & Dist: Battagram

Father's name and residence: Mohammad Arif


Date of birth by Christian era as nearly as can be ascertained: 03-04-1988
3rd April N.H. 88 eighty eight


Exact height by measurement: 5-3

Date: _____
Personal marks for identification: Minor Black mark on left side of nose

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

Ring Finger: 

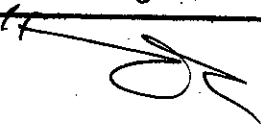
Middle Finger: 

Fore Finger: 

Thumb: 

Signature of Government Servant: Nabeela

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

Attested

(Schwaib & Associates)
Chartered Accountants

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts 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 Government Servant	Signature and Designation of the head of the office or other attesting authority in attestation columns 8 & 9
		<u>BPS: 9:- 3820-230-10720/-</u>						
AT G.G.M.S Seer Ghaziabad			3820/-			6/7/09	Nabeela	
do			3820/-			1/12/09	Nabeela	
do			4050/-			1/12/2010	Nabeela	
G.G.M.S Chohan			4050/-			8/4/2010	Nabeela	
		<u>Allow: B-15:- 5220-420-17820</u>						
2			5220/-			6/7/09	Nabeela	
2			5220/-			1/12/09	Nabeela	
2			5640/-			1/12/10	Nabeela	
		<u>Scale Revised on 1-7-2011</u>						
G.G.M.S Nili's Hong								
do	AT	8500-700-	20500	BPS-18		7/2011	Nabeela	
do			9200	✓		1/12/2011	Nabeela	
do			9900	✓		1/12/2011	Nabeela	
do			10600	✓		1/12/2012	Nabeela	

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts 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 Government Servant and Designation of the attesting station	
18 A.T								
G. GHS: Nilishang-			11300/5			1 ¹² / ₂₀₁₃	<i>Habeeda</i>	
G.GMS: Phay-Khair Phagora			11300/5				<i>Habeeda</i>	
do-		one Adv: 5220 + 420 = 5640	5640/5			6 ⁷ / ₀₉	<i>Habeeda</i>	
do-			5640/5			1 ¹² / ₀₉	<i>Habeeda</i>	
do-			6060/5			1 ¹² / ₁₀	<i>Habeeda</i>	
do		Grade: 8500 - 700 - 2950 = RPS-15	9900/5	9900		1 ⁷ / ₁₁	<i>Habeeda</i>	
do			10600/5	9900		1 ¹² / ₂₀₁₁	<i>Habeeda</i>	
do			11300/5	10600		1 ¹² / ₁₂	<i>Habeeda</i>	
do			12000/5	11300		1 ¹² / ₁₃	<i>Habeeda</i>	
do			12700/5	12000		1 ¹² / ₂₀₁₄	<i>Habeeda</i>	
do	original	induced	12000	12000			<i>Habeeda</i>	
do	original	induced	12000	12000			<i>Habeeda</i>	

OFFICE OF THE GENERAL MANAGER
 PAY FIXED IN THE RPS-15
 OF RS. 8500 700 2950 15
 AT RS. 12000
 With next increment on 11-12-2014

Accountant
 Pay Fixation
 N.W.F. Prakash
 20/7/15

8	9	10	11	12	13		14	15	
Signature of the head of the office or other attesting officer		Date of termination or appointment	Reason of termination (such as Promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer.	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
Signature of the head of the office or other attesting officer		Date of termination or appointment	Reason of termination (such as Promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer.	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	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	
						Period			
						Government to which debitable			
[Signature]	[Signature]	31-8-2014	Transfer District Kohistan District Battagram vide D.E.S.E. Peshawar dated 7/4/2014	[Signature]	Transfer	District Kohistan District Battagram vide D.E.S.E. Peshawar dated 7/4/2014	[Signature]		
[Signature]	[Signature]	31-8-2014	Allowed one adv. sncr. promotion	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-11-2014	gnet. District Education	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-8-2014	Revision of pay	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-11-2014	A/sncr.	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-11-2014	gnet.	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-11-2014	gnet.	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-12-2014	A/sncr.	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-6-2015	Spec. Prom.	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-10-2014	DEO (F) Battagram	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-10-2014	Allowed one advance increment of prem. w.e.f. the date of post B-9/8/15 upgraded vide finance notification No. FD(SR) SR-12-1231/2014 dated 30-5-2014	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-10-2014	Allowed one advance increment of prem. w.e.f. the date of post B-9/8/15 upgraded vide finance notification No. FD(SR) SR-12-1231/2014 dated 30-5-2014	[Signature]	[Signature]		[Signature]		
[Signature]	[Signature]	30-10-2014	Allowed one advance increment of prem. w.e.f. the date of post B-9/8/15 upgraded vide finance notification No. FD(SR) SR-12-1231/2014 dated 30-5-2014	[Signature]	[Signature]		[Signature]		

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts 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 Government Servant	e and Des head of the r attesting ittestation lumas 1 b
120 AT GAGAN Bankhead Ragore.	—	—	BPS 40115	15510/-	10985-	7 1/2015	905-38135	DE Bat
2	—	—	—	16415/-	—	12 1/2015	—	DE Bat
—	—	—	—	BPS 40 2/3510	—	—	1320 - 47110.	—
—	—	—	—	20230/-	—	7 1/2016	—	—
—	—	—	—	21350/-	—	12 1/2016	—	—
—	—	—	—	BPS 15 - 16/20	—	—	1330-56020	—
—	—	—	—	25430/-	—	01/07 2017	—	—
—	—	—	—	26760/-	—	01/12 2017	—	—
—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—

Alexander

8 Nature of Government Servant	9 Name and Designation of the head of the office attesting officer (Columns 1 to 8)	10 Date of termination or appointment	11 Reason of termination (such as Promotion, transfer, dismissal, etc)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
					Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government			
						Period			Government to which debtible
		30/11/2015	A/Gm	[Signature]				Very released WBF 1 ¹² 2014 vide this office no 3387 dt:16-11-2014.	
	DEO (F) Battagram			DEO (F) Battagram					
	DEO (F) Battagram	30/11/2016	6 Review of Pdt				[Signature]		
				District Education Officer (F) Battagram				Service Verified on 11/11/2014 30/11/2014 roll & other records of this office	
	District Education Officer (F) Battagram	30/11/2016	11				[Signature]	DEO (F) Battagram	
	District Education Officer (F) Battagram	30/11/2017						Open 9/10 card all on on account to Rs 60976/071-10-2014 to 30-11-2015 vide TNO 18-11-2015	
	DEO (F) Battagram	30/11/2017	Annual Derec.				[Signature]	District Accounts Officer Battagram	
	DEO (F) Battagram			DEO (F) Battagram				[Signature]	
								On account of loss vide S. No. 2222	
								dt: 1-1-2016, on account of D. G. O. (F)	
								Battagram No. 255-56 P.P. - dt: 2/11/2017	
								Sanctioned maternity leave WBF 8-4-2016 to 6-7-2016 vide DEO F, BM no 744-48 dt: 15/4/2016.	
								Service Verified on 11/11/2014 to 30/11/2015 roll & other records of this office	
				DEO (F) Battagram				DEO (F) Battagram	

WBF S. No. 255-56 P.P. dt: 2/11/2017
Vide DEO F, BM no 744-48 dt: 15/4/2016
WBF S. No. 255-56 P.P. dt: 2/11/2017
Vide DEO F, BM no 744-48 dt: 15/4/2016

DEO (F)
Battagram

DEO (F)
Battagram

[Signature]

DEO (F)
Battagram

3	9	10	11	12	13		14	15
Name and Designation of the officer or attesting officer Attestation of Columns 1 to 8		Date of termination or appointment	Reason of termination (such as Promotion, transfer, dismissal, etc)	Signature of the head of the office or other attesting officer. <u>22</u>	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
					Period	Government to which debitabale		
						Leave Sanctioned w/f 01/10/2016 to 30/11/2016. 61 days without pay vide DDO & BSM No 2327-28 dt: 22/10/2016.		
							DEO (F) Battagram	
						Leave Sanctioned w/f from 01/12/2016 to 20/12/2016 (20 days) without pay vide DDO (F) BSM No. 397-99 dt 31-01-2017		
							DRACP	
						Service verified w/f 1 ¹² / ₂₀₁₅ to 30 ¹¹ / ₂₀₁₆ from the aq: roll and other office record		
Removed from service due to long absence w/f 1-10-2016 Battagram No 1116-22				removed from service w/f 01/03/2017 dt: 30/5/2018.			District Education Officer (F) Battagram	
							DEO (F) Battagram	
							Battagram	
							pay stop w/f 10/11/2016 till further order.	

ANNEXURE محمدت ضابطہ نرسات قات سیکرٹری
"B" ایڈیٹری اینڈ سیکنڈری تعلیم ماہرین

شمارہ

درخواست پر شکم فرمائی جا D.D فی میل
سٹریم کو کہ سائیکل کی Posting کہیں
اور ڈیوٹی کرنے میں غلطی پیدا
نہ کریں۔

ضابطہ عالیٰ

یہ کہ سائل ہو رہا ہے کہ اس کی سمانہ نہیں سٹریم کی کوئی دوائی ہے
اور سائیکل کی تبدیلی کے لئے 7/2009 کو
ضلع کوستان میں ہوئی اس کے لئے سائیکل کوستان
کے مختلف سکولوں میں ڈیوٹی کرتی رہا۔

7/2011 کو سائیکل کی ڈرائنگ ضلع سٹریم میں ہوئی
اور اس کے لئے سائیکل سٹریم کی سکولوں میں
ایمان فرانسس نے ہی ادا کرتی رہا۔

تعمیرات
14

یہ کہ نومبر 2016ء میں جس نے D.D طلبہ
سائیکل کو فون پر اطلاع دیا کہ آپ کی ڈرائنگ HS
سٹریم میں ہو چکی ہے لہذا آپ اس کے دلچسپ
ڈیوٹی کے لئے تبدیل سائیکل دوسرے دلچسپ اسکول

گو دیاں کی صفیہ ڈسٹریکٹس مہلہ کھا کہ بیمار یاں سکول
 میں بیٹے سے AT ٹیسٹ اور کوئی مالی پوسٹ
 نہیں ہے اور نہ ہی آپ کی ٹرانسینڈرڈ ہیں موصول
 ہوا ہے۔
 اسی کے بعد سائڈ D.O صاحبہ دفتر میں آئے تو D.O صاحبہ
 سائڈ کو کھا کہ آپ کا ایسٹ اٹنڈنس مہلہ میں جائیں
 اور ڈیوٹی کرے۔ جب سائڈ دیکر دن آسکوں گے
 تو سائڈ کے برائے سائڈ ڈسٹریکٹس مہلہ س
 بھی کھا کہ میں کوئی ٹرانسینڈرڈ موصول نہیں ہوا ہے اور
 نہ بیمار یاں کوئی پوسٹ ملتا ہے۔
 سائڈ اسی روز واپس D.O صاحبہ کے پاس آئی اور تمام حالات واقعات
 بیان کیے تو D.O صاحبہ نے کھا کہ آپ انتظار کریں میں آپ
 تین دن انتظار کروں۔ نتیجتاً تک مگر موصول ہوا۔
 اس کے بعد سائڈ 2 ماہ تک انتظار کرتی رہی مگر کوئی حکم آرہا نہ D.O
 صاحبہ کے دفتر سے موصول نہیں ہوا۔
 اس کے بعد سائڈ D.O صاحبہ کے دفتر میں صبر لگاتی رہی ہوں
 مگر کمال اس نے کوئی جواب نہیں دیا۔ اور سائڈ سے ملنے سے
 انکار کرتی رہی ہے اور گزشتہ 18/8 ماہ سے سائڈ کے ساتھ یہ
 ڈرامہ D.O صاحبہ اور دفتر ایڈمنسٹریٹو نے لگایا ہے اور لہجہ
 کسی صاحبہ کے سائڈ کو ڈیوٹی سے منع کر رہا ہے۔

اللہ اعلم

میں آجے حساب سے پوربائے گزارتی رہی ہوں کہ D.O
 صاحبہ کو حکم کریں کہ میری پوسٹنگ کریں تاکہ میں
 اپنا کام سے ڈیوٹی شروع کروں۔

15/6/2017

الصارفین

صاحبہ

سجادہ تہذیب عارف و فن شاعر عارف AT ٹیسٹ مہلہ تعلیم مدللہ ہنگام
 سائڈ کھا ڈیوٹی شروع کریں مہلہ ہنگام

ذاتی - D.O - ضلع مظفر

درخواست برائے Posting اور تسخیر

ضلع عالی

خودمانہ تقرر شدہ عہدہ سائل ایک غیر متکبرانہ سے تعلق رکھتی ہے اور سال 2009ء سے قلم میں بطور

عربی ٹیچر تعینات ہے۔

چونکہ گورنمنٹ کا 2012ء سے سائل کو D.O. جو ضلع مظفر تعینات کر دیا ہے اور سائل کی پوسٹنگ کرنے سے انکاری

ہے اور زمانی طور پر سائل کو بھی ایک سکول میں بھیج دیا

ہے اور کئی دوسرے میں ویب سائٹ سکول میں قائم ہے

کو ایجنج اسپیڈ سٹیڈی میں لے کر بیمار یا اس AT

ٹیچر کی صلاحت سے نہیں ہے اور نہ ہی ہمیں کوئی ریسر

اور جو عمل ہو رہا ہے اور یہ سائل گورنمنٹ

2 سال سے سائل کے ساتھ موجود ہے اور D.O. کا

روز سائل کو بکسز کرتی رہی ہے اور ڈیوٹی کرنے

سے منع کیا ہے

لسا اے ایف ایف سائل کی ڈیوٹی کے لئے کسی

کمی سکول میں Posting کا حکم جاری کریں 20/11/2018

العارض

Habeeta

کفر رضا - ہوائی قصبہ - بہاول

صفحہ ۱

بہاول

ایڈیشن
الغلاف

ضابطہ عالی

مستند
مستند

موجودہ نگران اس عہدہ سائڈ سیکرٹری ضلع کی رہائش ہے اور
2009 سے حکم تعلیم میں بطور AT ٹیچر تعینات ہے
اور تعیناتی کے لیے سائڈ ایسی ڈیوٹی ٹوش اسٹوپی سے انجام
دہی رہی۔ نو مہینہ 2016 میں D.O صاحب نے سائڈ

کی طرف اور ڈیوٹی جاری کیا اور عہدہ سائڈ سیکرٹری
میں داخل ہو گئے۔ اس سے پہلے اس نے سائڈ کو چارج نہیں کیا اور ڈیوٹی
عہدہ سائڈ میں بھی اس نے سائڈ کو چارج نہیں کیا اور ڈیوٹی
کرنے سے منع کیا۔ اس کے لیے سائڈ D.O صاحب نے پاس لگائی تو D.O
صاحب نے سائڈ CHS اور ایگریکچر میں ڈیوٹی کرنے سے منع دیا
سائڈ وہاں رہے تو وہاں عہدہ سائڈ میں لگا کر بیمار سے پاس
کوئی پوسٹ AT ماحولی نہ ہے اور نہ ہی ہمیں کوئی نگران ڈیوٹی
جس کے لیے سائڈ دوبارہ D.O صاحب نے دفتر میں آگئی تو D.O
صاحب نے کہا کہ آگے 2 ہفتے تک انتہی رکھیں میں آگے کسی نگران
Posting کرن صوں سائڈ انتہی رکھتا رہا مگر 2 ماہ کے عہدہ سائڈ
کے لیے سائڈ دوبارہ D.O صاحب کے پاس لگائی تو D.O صاحب نے
میں سے انکار کیا۔ اور بالخصوص انہوں نے سائڈ کو آفس سے باہر کیا
اور کہا کہ آئندہ کسی دفتر میں نہ آئیں۔ اس کے لیے

صباح اللہ نے 2 ماہ تک انٹری رکھا اور پھر D.O
صوبہ کے دفتر میں گئی تو D.O صوبہ سندھ نے
ساتھ آمادہ مٹا دیوٹی اور کہا کہ میں آپ کو
لو لینے کے حوالے کرتی ہوں ورنہ صوبہ صوبہ کے
متعلق جانو۔ سندھ میں گزرائی۔ اس کے بعد سندھ

گزر گئی تعلیم صوبہ کو اور D.O صوبہ کو بھی
درخواستیں تیار کی مگر تاحال سندھ کو اتفاق
نہیں ملا اور تاحال سندھ کو D.O صوبہ کے
ڈیوٹی کرنے سے منع کیا گیا ہے اور ڈیوٹی کرنے
روک رکھا ہے اور سندھ گزرائی کے سالوں سے دعا کرتی چلی گئی ہے۔
جسے سندھ میں منتقل اور نوکری کا سوال ہے اور D.O
صوبہ ڈیوٹی کرنے سے جسے انکار کرتی ہے۔
اور کہتی ہے کہ عالی پوسٹ نہیں اور مختلف قسم کی
بھانے پر روز کرتی رہتی ہے۔

آئیے گزرائی ہے کہ سندھ کو اتفاق دلائی جائے اور
ڈیوٹی دیکھنے مناسب حکم فرمائیں۔

Subeda

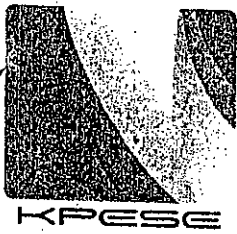
العارض

صبا نبید عارف دفتر محمد عارف (AT ٹیپ) سکے

Subeda

تعمیر گرام صوبہ گرام . Dated

20/11/2020



ANNEXURE "C" 28

OFFICE OF THE DISTRICT EDUCATION OFFICER (F)
PH#. 0997-310461

NOTIFICATION

1. WHEREAS Mst.Nabila Arif AT GGMS Pora was proceeded against under the Khyber Pakhtun khwa Govt. servant Efficiency and Disciplinary rule 2011 for the charges of having been willfully habitual absence from her duty 4.3.2017 reported by Head teacher concern and IMU.
2. AND WHEREAS charge sheet and statement of allegation was issued vide Endst No623-26 dated 25.4.2018 served upon Mst.Nabila Arif AT GGMS Pora.
3. AND WHEREAS, Inquiry committee was constituted comprising the following officers to conduct fact finding inquiry against accused for charges leveled against her in accordance with the rule.
 - i. Mst. Tahira ASDEO F Chairperson
 - ii. Mst. Aliya Hashim SST(G) GGHS Bania Member
4. AND WHEREAS, Inquiry committee after having examined the charges/evidences on record explanation of accused official has submitted the report.
5. AND WHEREAS Mst. Nabila Arif AT has been served with final show cause notice published in leading newspaper daily Mashriq and you were failed to submit reply nor you appeared before the competent authority within stipulated time.
6. AND WHEREAS the competent authority (District Education Officer F Battagram) after having considered the charges and evidence on record, enquiry report that, she has been failed to submit the reply in response to the charge sheet, is of the view that the charges against the accused official have been proved.

NOW THEREFORE, in exercise of the power conferred under section 14 khyber Pahtunhawa Govt. Servant (Efficiency and Discipline) rule 2011, I Mst. Rehana Yasmin the District Education Officer Female Battagram being competent authority is pleased to impose major penalty of removal from service upon Mst. Nabila Arif AT ~~WBAT~~ 04-3-2017


Rehana Yasmin.

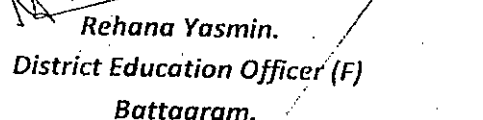
District Education Officer (F)
Battagram.

Dated Battagram the 20 / 5 / 2018

Endstt: No. 1116-221

Copy forwarded to:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Battagram.
3. Deputy District Education Officer (F) Local Office.
4. SDEO (F) Local Office.
5. PSHTs of concerned Schools.
6. PST Concerned.


Rehana Yasmin.
District Education Officer (F)
Battagram.

30/5/18

محمد و ضابطہ ڈاکٹر علی محمد علی ایڈووکیٹ ہندوئی
تعمیر ہونے پر توجہ خواہش ہے

29

ANNEXURE
D

قلم نامہ اپریل ۲۰۰۹ء بمقامی ملازمت

ضابطہ عالی

AT اسٹیٹ
وعدیہ تیارش عید سالہ کی لہجہ کی کھینچ
محمد تعمیر ضلع کوئٹہ میں 2009ء میں ہوئی اور سال 2011ء
میں سالہ کی ڈرائنگ ضلع کوئٹہ میں سے ضلع سوات میں
ہوئی۔ اس کے بعد سالہ تعینات خوش اسلوبی سے رہی عدالت
سراجام رہی ہے۔

یہ نو صبر 2006ء میں تھا کہ D.O صاحب نے سالہ کو فون رکھا
کہ آئی ڈی ڈرائنگ ڈاکٹر علی محمد علی ایڈووکیٹ ہندوئی میں ہوئی ہے
لہذا آئی ڈی ضلع ضلع کوئٹہ میں ڈیوٹی کیلئے مقرر ہو جائیں اس کے
بعد جب سالہ متعلقہ سکول میں گئی تو وہاں پر ایڈووکیٹ صاحب نے کہا کہ یہاں
پاس کوئی پوسٹ خالی ہے اور نہ ہی ہمیں کوئی ڈرائنگ آرڈر موصول ہوا
ہے۔ اس کے بعد سالہ D.O کی خدمت میں پیش ہوئی تو D.O صاحب نے کہا
کہ آئی ڈی ایڈووکیٹ صاحبہ میں ڈیوٹی کیلئے کل سے جائیں اس کے بعد
روز سالہ ڈاکٹر علی محمد علی ایڈووکیٹ ہندوئی کو وہاں پر ایڈووکیٹ صاحب نے کہا کہ
یہاں پاس کوئی خالی پوسٹ AT ہے نہیں ہے اور نہ ہی کوئی ڈرائنگ آرڈر
میں ملے۔ اس کے بعد سالہ دوبارہ D.O صاحبہ دفتر میں آگئی تو
D.O صاحب نے کہا کہ آئی ڈی کے تعلقہ تک منتقل رکھیں میں آئی ڈی پوسٹنگ
کے سکول میں کرتی ہوں۔ سالہ منتقل رہی رہی۔ 2 ماہ کا عید صبر گزار گیا سالہ
دفتر آئی تو D.O صاحب نے سالہ کو پوسٹنگ کے تعلقہ آئی ڈی سے باہر کیا۔

اور نام بالو صاحبان کو کہا کہ آئندہ کیلئے اس کو کسی بھی دفتر میں نہیں
 جمع کیا جائے گا۔ اور آئندہ کو ڈیوٹی سے ہٹا دیا گیا۔
 اس کے بعد سائیکل مختلف افسران بالا کو کسی درخواستیں تیار کی
 ہیں آئندہ مذکورہ درخواستوں کو کوئی عملدرآمد نہیں کیا اور
 نہ ہی سائیکل کے ڈیوٹی کیلئے کوئی جاری کیا
 اس کے بعد سائیکل مسلسل 50 مہینے کے دفتر جاتی رہی مگر ایک بار
 اور 50 مہینے سائیکل سے اصل فتائق کو چھینا ہے ہے اور کہتے
 کہ آج کی سیدہ جلد حل کرتے ہیں۔
 یہ فورم 5/5 ایک بالو صاحب سائیکل کو لکھ دیا کہ
 میرا نام کسی بھی نہیں بنانا آج۔ نوٹری سے D.O صاحب نے
 دیا ہے۔ جب مذکورہ آرڈر سائیکل نے خود پڑھی تو صاحبان رہ گئی
 کیونکہ مذکورہ آرڈر میں سائیکل کے صفحہ سبب سے تمام الزامات
 لگائے ہیں۔ جب کہ حقیقت میں سائیکل کو کوئی نوٹس
 تو مارا نہ تھا۔ تک حصول نہیں ہوا ہے۔ اور D.O صاحب نے
 بد نہیں سے سب کچھ اپنی طرف سے حقیقت سے کیا ہے۔
 یہ سائیکل کے ساتھ گزشتہ 4 سالوں سے عمل زبانی ہو رہا ہے
 اور سائیکل کے ساتھ 30/8/2021 کو نوٹری سے removed کیا ہے اور سائیکل
 کو کوئی آرڈر جاری نہیں کیا۔ اور لاہور میں حقیقت سے سب
 کچھ کیا ہے۔ ثبوت لے رہے۔

سیدہ
 لکھنؤ

اس سائیکل کے ساتھ کوئی ریکارڈ قائم
 نہ تھا۔ سائیکل کے بارے میں دعا گو رہے گی۔

فورم 5/5

الارض

Nabeela

مسماہ نیبیلہ عارف دفتر محمد عارف سابقہ سابقہ اتنی گانہ چھپرہ ایف بی ایم

کورٹ فیس

وکالت نامہ

BEFORE THE KHYBER PUKHTOON KHAWA SERVICE TRIBUNAL بعدالت

Ms + NAREELA ARIE نام CVUT عنوان:

APPELLANT منجانب:

SERVICE APPEAL نوعیت مقدمہ:

AT D

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

Hanayun Khan by Farzullah Khan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہوا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سندر ہے۔

المقوم: 9/2/2021

Accepted by

Accepted

بمقام:

Nareela Arie

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Handwritten title or section header in the middle of the page.

Main body of handwritten text, organized into several paragraphs within a decorative border.

Vertical handwritten text on the left margin, likely serving as a commentary or index.

Vertical handwritten text on the right margin, likely serving as a commentary or index.

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Handwritten text at the bottom left of the page.

(3)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT ABBOTTABAD

SERVICE APPEAL NO 7414/2021.

Nabeela Arif (Ex-Arabic Teacher) R/O Chappargram Tehsil &
District Battagram Appeal

Versus

Govt Khyber Pakhtunkhwa through Secretary Education
Peshawar and others respondents.

S.No	Description /Documents	Annexure	Pages
1	Comments		1 to 3
2	Affidavit		4,5
3	Copy of showcase notice	A	06
4	Show Cause Notice & Stoppage of Pay	B&C	07-12
5	Inquiry report, Charge Sheet, Daily Mashriq Peshawar & Daily Pine Abbottabad	D,E,F & G	13 to 19


RESPONDANT

of

**Before The Honourable Khyber Pakhtunkhwa Service
Camp Court Abbottabad**

Service Appeal No 7414/2021.

Mst: Nabeela Arif (Ex-Arabic Teacher) R/O Chappargram
Tehsil and District Battagram (Appellant)

Versus

Govt Khyber Pakhtunkhwa through secretary Education
Peshawar and others (Respondents)

**JOINT PARA WISE COMMENTS/REPLY ON
BEHALF OF RESPONDENTS NO 1 TO 3**

Respectfully shewith;

Preliminary objection,

1. That the appellant has no cause of action/locus standi to file the present appeal.
2. That the appellant has concealed the material facts from this honourable Tribunal.
3. That the appellant has not come to this honourable Tribunal with clean hands.
4. That the appellant has filed the instant appeal on malafide grounds, just to put pressure on the respondent department for illegal Reinstatement/ Back benefits.
5. That the appellant appeal is against the prevailing law and rules.
6. That the appellant is estopped by his own conduct to file the instant appeal.
7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
8. That the appeal is barred by law and badly time barred.
9. That appeal is bad for miss-joinder and non-joinder of necessary and proper parties

ON GROUNDS:

g. Ground "a" of the appeal is incorrect removal from services of the appellant is according to the Khyber Pakhtunkhwa E&D rules 2011.

b. Ground "b" of the appeal is incorrect reply is given in preceding para.

c. Ground "c" of the appeal is incorrect respondent followed the law/Rules and regulations of the Department and acted accordingly, detail reply is given in preceding para.

d. Ground "d" is incorrect hence denied, detail reply is given in preceding para.

e. Ground "e" of the appeal is incorrect and denied. Hence detail reply is given in preceding para.

f. Ground "f" of the appeal is incorrect hence denied. Detail reply is given in preceding para.

g. Ground "g" of the appeal is incorrect and denied.

h. Ground "h" of the appeal is incorrect and denied, detail reply is given in preceding para.

i. Ground "i" of the appeal is incorrect, respondent No.3 followed the rules/law under E&D Rules 2011.

j. Ground "j" of the appeal is incorrect, action taken by the respondent according to the rules and policies of the existing E&D rules 2011.

k. Ground "k" of the appeal is incorrect, hence denied, detail reply is given in preceding para.

l. In ground "l" respondent also seek permission of this honourable tribunal to agitate further points at the time of arguments.

It is therefore, humbly prayed that on acceptance of above para wise comments , the service appeal of the appellatant may graciously be dismiss.

Respondent No 3.




District Education Officer (F),
Battagram.

Respondent No 2.



Director (E&SE) Govt: of
KPK Peshawar

Respondent No 1.



Secretary (E&SE) Govt: of KPK
Peshawar

30-05

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT ABBOTTABAD**

SERVICE APPEAL NO 7414/2021.

Nabeela Arif (Ex-Arabic Teacher) R/O Chappargram Tehsil &
District Battagram Appeal

Versus

Govt Khyber Pakhtunkhwa through Secretary Education
Peshawar and others respondents.

AFFIDAVIT

I, **Najma Khan District Education Officer (Female) Battagram**,
do here by affirm and declared on the oath that contents of
accompanying para wise comments on behalf of responding No
3 are true and correct to the best of my knowledge and belief
that nothing has been concealed from this Honourable Tribunal.



DEFENDANT:
CNIC.15602-817776-4

21/04/22

Annex - A

06

IOE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT BATTAGRAM.

IND SHOW CAUSE NOTICE.

I Matt: Rehana Yasmeen District Education Officer (Female) Battagram as competent authority under the Khyber Pakhtunkhwa Govt: servant (Efficiency and Disciplinary) Rule, 2011 do here by serve this Ind Show Cause notice upon you MStt: Nabila Arif AT GGMS Mehalla Bhai Khail .

Consequent upon the report of: Head Mistress GGMS Mehalla Bhai Khail, I am satisfied that you have committed the following acts/omission specified in rule 03 of the said rules.

Guilty of wilful absence, 04.07.2014 up to Date. A Show Cause has already been upon you vide this office Endst. No, 2711-14 Dated 12.10.2014 on your wilful absence from duty v.p.f, 01.03.2014

- 1. Minor Penalty.
 - (i) Recovery of the absence period
 - (ii) Stoppage of two increments.
- 2. Major Penalty.
 - (i) Removal from service.

- 1. Therefore you are required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- 2. If no reply to this notice is received within 07 days of its delivery it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

OIC DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT BATTAGRAM.

Endst. No. 2786-88 / Dated. 28/10/2014.

Copy forwarded to the:-

- 1. Director(EZSE) Education Khyber pakhtunkhwa peshawar.
- 2. Deputy Commissioner Battagram.
- 3. DDO Concerned with the direction to deduct salary of their absent period.
- 4. Teacher/J.O/Class IV Concerned.

OIC DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT BATTAGRAM. 28/10/14

A Anwar B (107) 06
①

Government of Khyber Pakhtunkhwa
Office of the District Education Officer Female
BATTAGRAM

File No: 12/OAMIS/Aug
Dated: 15-Aug-2017

To
District Education Officer
BATTAGRAM,

Pay already stopped.

: - Deduction of Salary On Account of Willful Absence from Duty

1 As per the monitoring report of the IMU Monitor, Mr/Ms. nabeela arif (Personal Number null) was found Absent from duty without any lawful authority, on 08-Aug-2017.]

In view of the above you are directed to ensure deduction of one-day salary of the above mentioned official immediately and send this office an undertaking that the salary has been deducted. Absence of the above mentioned official may be treated as leave without pay.]

District Education Officer (F) Battagram

Even No. & Date

of the above is forwarded to the: -

Director, Elementary & Secondary Education Department, G T Road, Peshawar
Headmaster/Headmistress GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM
nabeela arif, GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM


District Education Officer (F) Battagram

595-187949



Government of Khyber Pakhtunkhwa
Office of the District Education Officer Female
BATTAGRAM

File No: 08 /OAMIS/Oct
Dated: 26-Oct-2017

To,
Deputy District Education Officer
BATTAGRAM,

Pay already stopped.

Subject: - Deduction of Salary On Account of Willful Absence from Duty

1. As per the monitoring report of the IMU Monitor, Mr/Ms. nabeela arif (Personal Number null) was found absent from duty without any lawful authority on 23-Oct-2017.

2. In view of the above you are directed to ensure deduction of one-day salary of the above mentioned official immediately and send this office an undertaking that the salary has been deducted. Absence of the above mentioned official may be treated as leave without pay.

District Education Officer (F) Battagram

Endst: Even No. & Date

Copy of the above is forwarded to the: -

- Director, Elementary & Secondary Education Department, G T Road, Peshawar
- Headmaster/Headmistress GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM
- nabeela arif, , GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM

District Education Officer (F) Battagram

124315-211794

Annex 'B' (09)

Government of Khyber Pakhtunkhwa
Office of the District Education Officer Female
BATTAGRAM

File No: 08/OAMIS/Sep
Dated: 26-Sep-2017

District Education Officer
AM,

Pay already stopped.

Deduction of Salary On Account of Willful Absence from Duty

The monitoring report of the IMU Monitor, Mr/Ms. nabeela arif (Personal Number null) was found on duty without any lawful authority on 14-Sep-2017.

In view of the above you are directed to ensure deduction of one-day salary of the above mentioned official immediately and send this office an undertaking that the salary has been deducted. Absence of the above mentioned official may be treated as leave without pay.

District Education Officer (F) Battagram

At: Even No. & Date

Copy of the above is forwarded to the: ---

- i. Director, Elementary & Secondary Education Department, G T Road, Peshawar
- ii. Headmaster/Headmistress GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM
- iii. nabeela arif, , GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM


District Education Officer (F) Battagram

116329-200253



Government of Khyber Pakhtunkhwa
Office of the District Education Officer Female
BATTAGRAM

Annex - 25
10

File No: 22/OAMIS/June
Dated: 12-Jun-2017

Deputy District Education Officer
BATTAGRAM,

Boy already stopped

Subject: - Deduction of Salary On Account of Willful Absence from Duty

1. As per the monitoring report of the IMU Monitor, Mr/Ms. nabeela arif (, Personal Number Null) was found absent from duty without any lawful authority on 05-Jun-2017.

2. In view of the above you are directed to ensure deduction of one-day salary of the above mentioned official immediately and send this office an undertaking that the salary has been deducted. Absence of the above mentioned official may be treated as leave without pay.

District Education Officer (F) Battagram

Endst: Even No. & Date

Copy of the above is forwarded to the: -

- i. Director, Elementary & Secondary Education Department, G T Road, Peshawar
- ii. Headmaster/Headmistress GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM.
- iii. nabeela arif, , GGMS Pora, KUZABANDA, BATTAGRAM, BATTAGRAM

[Signature]
District Education Officer (F) Battagram

107891-182923

48

DISCIPLINARY ACTION

I, Mst: Rehana Yasmin District Education Officer (Female) Elementary & Secondary Education District Battagram as a competent authority am of the opinion that Nabeela Arif AT Govt: Girls Middle School Pora rendered himself liable to be proceeded against, as she committed following acts/omissions within the meaning of Rule -3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

1)- Guilty of Misconduct / Habitual Absent

2.) For the purpose of Inquiry against the said accused with reference to the above allegations, an Inquiry committee, consisting of the following, is constituted under rule 10(1) (a) of the ibid Rules.

- i. Tahira Bibi ASDEO(F) Battagram Chairman
- ii. Aliya Bibi Head SST (G) GGHS Banian Member

3.) The Inquiry Committee shall, in accordance with the provisions of the ibid rules provide reasonable opportunity of hearing to the accused, record its findings and make within fifteen days of the receipt of this order, re commendations as to punishment or other appropriate action against the accused.

4.) The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry committee.

Endst: No. 627-30

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Dated 25.14.2018

Copy forwarded for information to:

- 1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2. The Deputy Commissioner Battagram
- 3. All inquiry committee
- 4. Nabeela Arif AT GGMS Pora
- 5. Office Copy.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Handwritten notes and signatures at the bottom left of the page, including a signature and the date 25/4/2018.

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D (13)

The District Education

Inquiry office: (F) Battagram
Subject: Enquiry Report in r/o Nabila Arif AT BPS-15
of G.G.M.S. Porra

Memo Reference your letter No 125 dated 15/03/18

I have the honor to submit detail report on
the subject cited above.

I informed the Head Mistress of G.G.M.S.
Porra dated 21/03/2018, telephonically and asked
her about ~~my~~^{our} visit dated 22/03/18 and asked
her for provision complete documentary record
for facts & findings.

^{w.e.} I reached G.G.M.S. Porra at 10 am dated
22/03/18 and luckily the incharge Head Mistress
namely Saeeda Sema c.T. was present in the
school with complete relevant record.

Statement of the I/c Head Mistress: I, Mst Saeed Sema c.T.
I solemnly declare that Nabila Arif AT has been
mutually transferred from G.G.M.S. Mahallah Bhikhel
dated 04/03/2017. Endst No 810-13, but she could not
reported her arrival in G.G.M.S. Porra and nor she has come
to school for duty she is absent as disappeared from
duty w.e. from 05/03/2017. I have many time sent her
absent report to DEO (F) Battagram, but NIL result.

Statement of TALAT HUSSAIN DM: I solemnly declare that
II Nabila Arif has not reported of her arrival as AT and
nor she has come to school w.e. from 04/03/2017.

Statement of Muhammad Muneer N/A: I solemnly declare
III that Nabila Arif AT has not come to school w.e. from
four

04/03/17 upto 22/03/2018. copies of all the ~~three~~^{three} statements
are attached herewith

14-4-2018

Tahira, ASDEO (F),
Circle Battamori,
Distt: Battagram

(14)

Bailey
order to me
Staff attend
D/O(F)

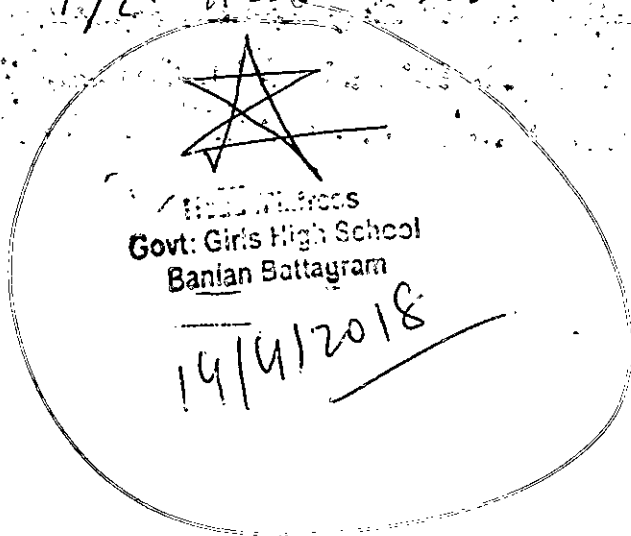
Conclusions

In the light of above written statement of three persons, it is quite clear that Nabila Arif has not duties as AT after her transfer order No. ⁸¹⁰⁻¹³ ~~75~~ date and nor she has come to school for arrival. The result that she is absent in the school record and also in the attendance register w.e. from 04/03/2017.

Recommendations

- 1) A Show Cause Notice for absence from service may be issued on the permanent address of Mst. Nabila Arif Ex AT of G.G.M.S. Mahallah Bhi Khel.
- 2) Pay of Nabila Arif may please stopped with immediate effect and if she has received her pay from 04/03/17 for even a single day, it may be recovered from her.
- 3) If the said teacher fail to ensure her attendance, then strict action should be taken according to EN.D. Rules 2011.

I/c Head Mistress



Office of The
DISTRICT EDUCATION OFFICER (F)

BATTAGRAM
CHARGE SHEET

Annex

E

Mst: Rehana Yasmin District Education Officer (Female), Elementary & Secondary Education District Battagram as a competent authority hereby charge you Mst: Nabeela arif (AT Govt: Girls Middle School, Pora as following.)

That you committed the following irregularities:

1) - 1) - Guilty of Misconduct / Habitual Absent

By reason of the above you appear to be guilty of "misconduct" under rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the Rules ibid.

3. You are therefore required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer/inquiry committee, as the case may be.

4. Your written defense, if any, should reach the inquiry committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

5. Imitate whether you desire to heard in person.

6. A statement of allegation is enclosed.

scd
DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM

Endst: No. 623-26

Dated 25/4/2018

Copy forwarded for information to:

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Battagram
3. All inquiry committee
4. Nabeela Arif AT GGMS Pora
5. Office Copy.

QC
DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM

سیدہ نوبہا
25/4/2018

روزنامہ مشرق پشاور اسلام آباد (ق) 16 مئی 2018

DAILY MASHRIQ PESHAWAR
روزنامہ مشرق
مسلط اشاعت کے 51 سال

ان اوقات میں صوبہ فوج کے اعلیٰ افسران کی عمارت پر قبضہ کیے لڑائی جاری، ستالیں آبادی نظر انداز

ہوائی اڈے، پولیس مرکز اور صوبائی انتظامیہ کی عمارت پر بھی قبضہ کیے لڑائی جاری، ستالیں آبادی نظر انداز
خفیہ ایجنسی کی عمارت پر قبضہ کی کوشش کا سراغ نہیں ہو سکا، 8 گھنٹہ لڑاکا ہو گئے، حملے کے بعد فوجیوں نے
کابل (آئی این پی) انتظامیہ سب سے فوجیوں کے پاس مرکز اور صوبائی انتظامیہ کی عمارت پر قبضہ کیے لڑائی جاری، ستالیں آبادی نظر انداز
ملازمین پر تھاپوں نے فوجیوں کو بھی تھکایا، فوجیوں نے حملے کے لیے کوئی فوجی سے لڑائی جاری، ستالیں آبادی نظر انداز
کر لی، ملازمین سب سے فوجیوں کے ہوائی اڈے، پولیس مرکز اور صوبائی انتظامیہ کی عمارت پر قبضہ کیے لڑائی جاری، ستالیں آبادی نظر انداز

اوقاف پشاور کا سی بی سی میں شمولیت کا اعلان

اوقاف پشاور کی ضرورت پر زور دیا
گورنر، اوقاف پشاور کی ضرورت پر زور دیا
اوقاف پشاور کی ضرورت پر زور دیا

پاک چین اقتصادی راہداری میں شمولیت
اوقاف پشاور کی ضرورت پر زور دیا
اوقاف پشاور کی ضرورت پر زور دیا

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اوقاف پشاور کی ضرورت پر زور دیا

نمبر شمار	نام لادریہ	سکول	عمر مشر ماہنامی
1	نبیلہ عارف دختر محارفات طوٹوری	گورنمنٹ گورنرل سکول	نومبر 2016 تا حال
2	جویریہ یارنس دختر ماس خان ڈرانگ ماسز	گورنمنٹ گورنرل سکول	دسمبر 2016 تا حال

اوقاف پشاور کی ضرورت پر زور دیا
اوقاف پشاور کی ضرورت پر زور دیا

پاک چین اقتصادی راہداری میں شمولیت
اوقاف پشاور کی ضرورت پر زور دیا
اوقاف پشاور کی ضرورت پر زور دیا



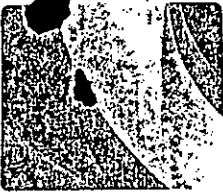
مراٹھ، سرکاری اور غیر سرکاری عمارتوں میں شمولیت

ایوب پیچنگ ہسپتال
حکومت کی جانب سے ہسپتال کی تعمیر
ایوب پیچنگ ہسپتال کی تعمیر
ایوب پیچنگ ہسپتال کی تعمیر

اوقاف پشاور کی ضرورت پر زور دیا
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اوقاف پشاور کی ضرورت پر زور دیا





KPESE

OFFICE OF THE DISTRICT EDUCATION OFFICER (F)

PH#. 0997-310461

Annex G

5⁶⁰
118

NOTIFICATION

1. WHEREAS Mst.Nabila Arif AT GGMS Pora was proceeded against under the Khyber Pakhtun khwa Govt. servant Efficiency and Disciplinary rule 2011 for the charges of having been willfully habitual absence from her duty 4.3.2017 reported by Head teacher concern and IMU.
2. AND WHEREAS charge sheet and statement of allegation was issued vide Endst No623-26 dated 25.4.2018 served upon Mst.Nabila Arif AT GGMS Pora.
3. AND WHEREAS, Inquiry comettee was constituted comprising the following officers to conduct fact finding inquiry against accused for charges leveled against her in accordance with the rule.
 - i. Mst. Tahira ASDEO F. Chairperson
 - ii. Mst.Aliya Hashim SST(G) GGHS Bania Member
4. AND WHEREAS ,Inquiry committee after having examined the charges/evidences on record explanation of accused official has submitted the report.
5. AND WHEREAS Mst. Nabila Arif AT has been served with final show cause notice published in leading newspaper daily Mashriq and you were failed to submit reply nor you appeared before the competent authority within stipulated time.
6. AND WHEREAS the competent authority (District Education Officer F Battagram) after having considered the charges and evidence on record ,enquiry report that,she has been failed to submit the reply in response to the charge sheet,is of the view that the charges against the accused official have been proved.

NOW THEREFORE, in exercise of the power conferred under section 14 khyber Pahtunhawa Govt. Servant (Efficiency and Discipline)rule 2011, I Mst.Rehana Yasmin the District Education Officer Female Battagram being competent authority is pleased to impose major penalty of removal from service upon Mst.Nabila Arif AT ~~with immediate effect~~ WEF 04.3.2017.


Rehana Yasmin.

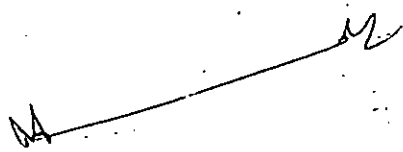
District Education Officer (F)
Battagram.

Dated Battagram the 30/5/2018

Endstt: No. 1116-22

Copy forwarded to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Battagram.
3. Deputy District Education Officer (F) Local Office.
4. SDEO (F) Local Office..
5. PSHTs of concerned Schools.
6. PST Concerned.



Rehana Yasmin.
District Education Officer (F)
Battagram.

30/5/18

رجسٹر حاضری مُدرسین گورنمنٹ گرلز مڈل سکول پورٹو

2017ء

بابت ماہ اکتوبر

نام سکھن سہراد				سکھن سہراد				سید عارف				احسان الحق			
A.T				A.T				A.T				Saeeda			
ردیف	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی
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3		Saeeda	2:20	Saeeda	8:15	Sahrah	2:20	Sahrah	8:15						
4		Saeeda	2:20	Saeeda	8:15	Sahrah	2:20	Sahrah	8:15						
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روز	مال	ساعت	بیران	مال	ساعت	بیران	مال	ساعت	بیران	مال	ساعت	بیران

دستخط پرنسپل

تاریخ

محل

نام

بیران

گورنمنٹ گرلز ہائی اسکول، کوئٹہ

احسان الحق Saeed				نیل عارف A.T				سعدہ بیگم C.T				سحر شمس الدار C.T			
آء	دستخط	برائی	دستخط	آء	دستخط	برائی	دستخط	آء	دستخط	برائی	دستخط	آء	دستخط	برائی	دستخط
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X															

وزن	ساعت	وزن	ساعت	وزن	ساعت	وزن	ساعت	وزن	ساعت	وزن	ساعت

دستخط ہیڈ ماسٹر



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
BATTAGRAM

demistbattagram@gmail.com

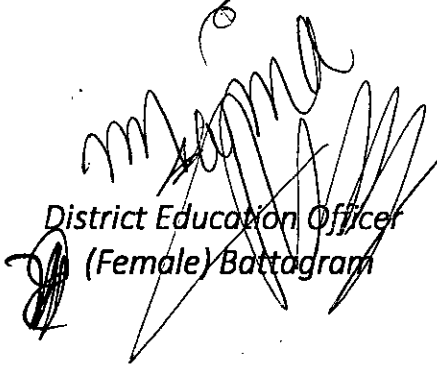
(Phone#0997310460)

No. 1540

Dated: 10/06/2022

Authorization Letter

Mr. Yar Muhammad ADEO (Litigation) BPS-16 DEO(F) Battagram having CNIC No: 13202-0774542-1 is hereby authorized on behalf of undersigned to attend the Honourable Service Tribunal Peshawar Camp Court Abbottabad on 15/06/2022 in respect of Mst. Nabeela Arif S.A/W.P No: 714/2021.


District Education Officer
(Female) Battagram