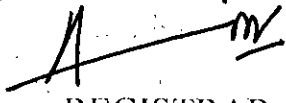


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 523/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/03/2023	<p>The appeal of Mst. Najmul Huda resubmitted today by Mr. Mushtaq Ahmad Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____. Notices be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Najmul Huda d/o Said Farosh Ex. SST GGHS Shahdam Buner received today i.e. on 03.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellant for completion and resubmission within 15 days.

- 1- Page no. 9 & 12 of the appeal are illegible which may be replaced by legible/better one.
- 2- Certificate be furnished that whether any petition on the subject matter has earlier been filed in this court.
- 3- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 891 /S.T,

Dt. 7/3 /2023

  
REGISTRAR

SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mushtaq Ahmad Khan Adv.  
High Court at Buner.

R/six

- obj No: 1. Better copies Attached.
- // 2. Attached on Page No: 3.
- // 3. Attached.



9-3-2023

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No. 523/2023

Najmul Huda d/o said farosh Ex SST GGHS shadam Buner, r/o village nawagai  
tehsile mandanr district Buner.....appellant

Vs

District Education officer (f) Buner and others.....respondents

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5	Application for earn leave	"B"	9-9A
6	Impugned order of removal dated 13/10/22 and departmental appeal	"C" C1	10-12
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8	Court fee		
9	Wakalat nama		15

Dated: 02/02/2023

(M)  
Appellant  
Through

Mushtaq ahmad khan  
Office at district court  
daggar, buner  
Cell no  
03469014199

1

**Before the service tribunal khyber pukhtoonkhwa Peshawar .**

Service appeal No. 523.....2023

Najmul Huda d/o said farosh Ex SST GGHS shadam Buner, r/o village nawagai  
tehsile mandanr district Buner.....appellant

**Vs**

1. District Education officer(f) Buner .
2. Director E & SE khyber pukhtoonkhwa at Peshawar.
3. Secretary E & SE khyberpukhtoonkhwa at Peshawar.
4. Govt of K.P.K through secretary E & SE khyberpukhtoonkhwa at Peshawar.

**Appeal against the impugned order dated 13/10/2022 Endst No  
1137.40/A.17/PF /najmul Huda/SST/Buner whereby the respondent No 2  
removed the appellant from service in total derogation of law and rules.**

**Respectfully sheweth;**

1. That the appellant had been serving as Government school teacher since the year 1996 and was lastly promoted as SST on 1/11/2014 and was performing her duties efficiently, with full zeal and devotion. (promotion order to SST attached as anx A )
2. That the appellant remained in the aforesaid service for about 26 long years with unblemished service record and never ever absented from her duty and it is evident from her service record that neither had she remained absent nor any disciplinary action has been taken against her.
3. That at the end of February 2022 the appellant got some personal/domestic nature issues due to which attending the school was highly risky for her and under compelling situation she was going to sought retirement but the office of the respondent no 1 told her that she had a lot of leave in her credit hence she should request for leave and after solution of her problems she would be able to join the service hence she filled an application for leave on 2/3/2022 before the respondent no 1 who assured her for leave. (application for leave attached as annex B)
4. That the appellant was never informed that her application for leave was either rejected or not entertained rather she had been told that her case for leave is genuine and was promised for leave, hence the appellant was under legitimate expectancy that her application for leave had been accepted.
5. That in October 2022 the appellant wanted to join her duty but came to know that she had been removed from service without issuance any show cause notice and without following the principle of natural justice hence after obtaining the impugned order of removal she preferred a departmental appeal before the respondent no 3. ( impugned order of

2

removal dated 13/10/22 and departmental appeal attached as an x C and C1)

6. That the appellate authority called the appellant for personal hearing on one occasion but she was not heard on that date and her hearing was adjourned to 20/12/2022. (letters for personal hearing attached as an x D)
7. That on 20/12/2022 the appellant was heard by the appellate authority and all the aforesaid facts were brought into his notice in detail but no order was passed on the appeal of the appellant within the statutory period.
8. That the appellant time and again requested the respondents for formally allowing her to resume her duties as her problems have overcome but they did not allow her with malafide intention.
9. That without providing any charge sheet, statement of allegation, final show cause notice and conducting inquiry the respondent no 2 passed the impugned order dated 13/10/2022 where by the appellant was removed from service and appeal there against has not been decided within the statutory period hence this appeal on the following grounds inter alia.

**GROUND:**

1. That the impugned order dated 13.10.2022 is against the law, rules and natural justice.
2. That the appellant have neither been charge sheeted nor any statement of allegation have been communicated to him. moreover no regular inquiry have been conducted nor the appellant have been heard in the matter by the removing authority and the whole proceeding have been done it the back of the appellant on which score the impugned order is illegal and unjustified.
3. That the appellant have neither been associated with any inquiry nor any final show cause notice have been send to him and he has been completely condemn unheard.
4. That, the procedure contained in efficiency and discipline rules ,2011 has not been followed rather the process/procedure adopted by the respondents is contrary to the law on the subject hence liable to be set aside.
5. That the appellant have not been treated according to the law applicable to the civil servants, hence the impugned order is against the spirit of the law.
6. That the appellant was facing very dismal situation and under compulsion wanted to retire as she had efficiently performed her duties for more than 25 years but on the instance of the respondent No 1 had made application for leave who had assured and promised her for acceptance of her application for leave hence the appellant was under the impression that her application for leave was accepted.
7. That principle of promissory, estoppel and legitimate expectancy is fully in favor of the appellant.

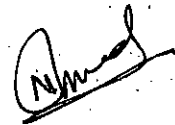
3

8. That the respondent have penalized the appellant for their own wrongs which penalty is not sustainable in the eye of law.
9. That the appellant seek the permission of this worthy tribunal to rely on additional grounds at the time of arguments.

It is therefore kindly prayed that on acceptance of this appeal the impugned order dated 13/10/2022 may kindly be set aside and the appellant may kindly be re-instated in service with all back benefits.

Any other relief not specifically prayed for and which this worthy tribunal deem fit and appropriate in the facts and circumstances of the instant case may also kindly be granted for the end of justice.

Dated: 2/13/2023



Appellant

Through



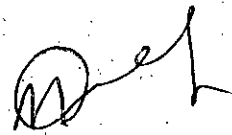
Mushtaq Ahmad khan alizai

Advocate, office district court

Buner. cell No 03469014199.

**Certificate:**

Certified that as per instruction of my client that no such like appeal has earlier been filed on the subject matter before this Hon'ble Tribunal.



**ADVOCATE**

9

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....2023

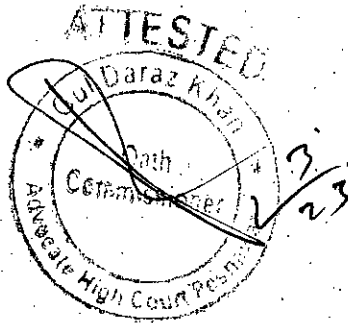
Najmul Huda d/o said farosh Ex SST GGHS shadam Buner, r/o village nawagai  
tehsile mandanr district Buner.....appellant

Vs

District Education officer (f) Buner. and others.....respondents

**AFFIDIVET**

I Najmul huda EX SST GGHS shahdam district buner, do hereby solemnly affirm  
and declare on oath that the contents of the instant service appeal is correct to  
the best of my knowledge and belief & nothing has been concealed from this  
worthy tribunal.



  
Deponent

5

**Before the service tribunal khyber pukhtoonkhwa Peshawar .**

Service appeal No.....2023

Najmul Huda d/o said farosh Ex SST GGHS shadam Buner, r/o village nawagai  
tehsile mandanr district Buner.....appellant

**Vs**

District Education officer (f) Buner and others.....respondents

**Addresses of parties**

**Appellant:**

Najmul Huda d/o said farosh Ex SST GGHS shadam Buner, r/o village nawagai  
tehsile mandanr district Buner

**Respondents**

1. District Education officer (f) Buner .
2. Director E & SE khyber pukhtoonkhwa at Peshawar.
3. secretary E & SE khyberpukhtoonkhwa at Peshawar.
4. Govt of K.P.K through secretary E & SE khyberpukhtoonkhwa at Peshawar.



Through

Mushtaq Ahmad Khan Alizai  
Advocate, office district court  
Buner, cell No 03469014199.



(6)



**NOTIFICATION:**

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (General) noted against each in BPS-16 (Rs10000-800-34000) plus usual allowances as admissible under the rules on the regular basis under the existing policy of the provincial Govt, on the terms and conditions given below with immediate effect and posted on " School Based " as given below.

**A. SST (GENERAL)**

**I. PROMOTED FROM SCT/CT TO THE POST OF SST (GENERAL) BPS-16**

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	BAKHT JAMILA	GGHS HISR	GGHS HISAR	A.V.P
2	GUL KHUJAN	GGHS NAWAGAI	GGHS KORYA	A.V.P
3	MUHSIN ZARI	GGHS NAWAGAI	GGMS KHANANO DHERI	A.V.P
4	SHAIKAT BIBI	GGHS KAWGA	GGHS KAWGA	A.V.P
5	NIZAKAT BEGUM	GGHSS PANJTAR	GGMS NOGRAM	A.V.P
6	MUMLIKAT BEGUM	GGHS SHALBANDI	GGHS SHALBANDAI	A.V.P
7	GULSHAN ARA	GGHS CHINGLAI	GGHS SOWAWAI	A.V.P
8	RUKHSANA BEGUM	GGHS BAZARGAY	GGHS BAZARGAY	A.V.P
9	JEHAN ARA	GGHS TOTALAI	GGHS SOWAWAI	A.V.P
10	MERAJ ZARI	GGHS SHALBANDI	GGMS DEWANA BABA	A.V.P
11	ZAHIDA	GGHSS KALPANI	GGHSS KALPANI	A.V.P
12	NAHEED BEGUM	GGHS BAGRA	GGHS BAGRA	A.V.P
13	KALSOOM BIBI	GGHSS PACHA KALAY	GGHSS PACHA KALAY	A.V.P
14	SALMA BEGUM	GGHS SOWARI	GGHS SOWARI	A.V.P
15	SAIQA KHAN	GGHS TOPAI	GGHS TOPAI	A.V.P
16	NIZAKAT	GGHS KORYA	GGCMS MAIRAGAI	A.V.P
17	UMM IKALSOOM	GGHS SHADAM	GGHS SHADAM	A.V.P
18	SAHIDA	GGHS DAGAI	GGHS DAGAI	A.V.P
19	MAHABEEN ZAHIR	GGHS SOWARI	GGMS ELAI	A.V.P
20	SAEBEDA	GGHS BATANAI	GGHS BATANAI	A.V.P

**ATTESTED**

Relive A news  
01/11/2014

21	SOHAILA NAZ	GGHS DAGAI	GGMS GHAZI KOT	A.V.P.
22	PARVEEN SHAHEEN	GGHS SURA	GGHS SURA	A.V.P.
23	NASREEN BEGUM	GGHS BAZARGAY	GGHS BAZARGAY	A.V.P.
24	HAMIDA BEGUM	GGHS BATANAI	GGHS CHEENA	A.V.P.
25	TAZKIRAH	GGHS BAGRA	JICA DAGGAR	A.V.P.
26	NASREEN BEGUM	GGHSS TOTALAI	GGMS MANGAL THANA	A.V.P.

7

2. PROMOTED FROM SDM/DM TO THE POST OF SST (GENERAL) BPS-16

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	JANAT BEGUM	GGHS SHALBANDI	GGHS ANGHAPUR	A.V.P.

3. PROMOTED FROM SAT/AT TO THE POST OF SST (GENERAL) BPS-16

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	HUMERA BIBI	GGHS KAWGA	GGHS SURA	A.V.P.
2	UMME KALSOOM	GGMS SAWAWAI	GGCMS BAMPOKHA	A.V.P.

4. PROMOTED FROM STT/TT TO THE POST OF SST (GENERAL) BPS-16

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	NARGAS	GGMS DAGGAR	GGMS CHANAR	A.V.P.
2	ZEDA KHAN	GGMS ANGHAPUR	GGHS ANGHAPUR	A.V.P.
3	NAWAYAT BIBI	GGHSS PANJAR	GGHS JOWAR	A.V.P.

5. PROMOTED FROM SOARI/QARI TO THE POST OF SST (GENERAL) BPS-16

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	NADIA	GGHS KARAPA	GGHS KARAPA	A.V.P.
2	BAKHTI RAZA	GGHSS KALPANI	GGMS BAJKATA	A.V.P.

6. PROMOTED FROM PSHT/SPST/PST TO THE POST OF SST (GENERAL) BPS-16

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	HUSSAN ARA	GGPS MASKIPUR	GGMS MAKHRANAI	A.V.P.
2	SHAHEEN BEGUM	GGPS WAHID ABAD	GGCMS SURA	A.V.P.
3	FATWARANI BEGUM	GGPS NAGRAI	GGHS MATWANI	A.V.P.
4	NAJMUL HUDA	GGPS KH, DHERAI	GGMS CHARORAI	A.V.P.

26/11/2014

01-11-2014

ATTESTED

5	ALIA BEGUM	GGPS TOTALI	GGMS GUL BANDAI	A.V.P
6	NAHEED BEGUM	GGPS KAS KOROONA	GGMS TANGORA	A.V.P
7	TAMAL BIBI	GGPS MANJAR	GGMS KINGER GALI	A.V.P
8	RUKHSANA	GGPS KRAPA	GGMS SHANAI NA WAKALAY	A.V.P
9	ROMANIA	GGPS DAGGAR	GCMS HISAR THANGAY	A.V.P
10	AYSHA BIBI	GGPS PAK-BANR	GGMS KASS KOROONA	A.V.P
11	SHAMIM AKHTAR	GGCMS SULTAN WAS	GGMS KATKALA	A.V.P
12	NUSRAT BEGUM	GGCMS SULTAN WAS	GCMS SULTANWAS	A.V.P
13	DAVENDER KOR	GGPS KAWGA	GGMS KULYARI	A.V.P
14	RAZIA BEGUM	GGPS QADAR NAGAR	GCMS NARBATAWAL	A.V.P

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-Se-seniority on lower post will remain intact.
6. No TA/ DA will be allowed to the appointee for joining their duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them, in light of this order, will be recovered and if they were wrongly promoted they will be reversed.
8. Their posting will be made on school based, they will have to serve at the place of posting and their service is not transferable to any other station.
9. Before handing over charge, once again their documents may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.

(RABIA ANEES)  
DISTRICT EDUCATION OFFICER(F)  
BUNER.

Endst; No. 8472-79 Dated. 01/11/2014.

Copy forwarded for information and necessary action to :-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with r/t Endst; No.3436-40/File No.2/Promotion SST B-16 dated Peshawar the 28/10/2014.
2. Deputy Commissioner Buner.
3. District Accounts Officer Buner
4. District Monitoring Officer Buner
5. Principals/Head Mistresses concerned.
6. Sub Divisional Education Officer (F) Buner.
7. Officials concerned.
8. Master file.

*Rabia Anees*  
01/11/2014  
DISTRICT EDUCATION OFFICER(F)  
BUNER.

Ans B

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Forwarded to Delhi  
for a copy to B...  
Further nfo please

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11

بخدمت جناب (F) DEO صاحبہ محکمہ تعلیم ضلع بونیر

عنوان: درخواست براد E/Leave w.e.f 02/03/2022 to 01/03/2024

جناب عالیہ!

نہایت آداب کیساتھ گزارش کیجاتی ہے کہ میں مسمیٰ نجم الہدٰ (G) SST پوسٹ پر GGHSS شاہ روم (امارتی) میں اپنی منصبی فرائض سرانجام دے رہی ہوں چونکہ مجھے گھریلو مشکلات کی وجہ سے مجھے E/Leave کی اشد ضرورت ہے۔

اس لئے آپ صاحبان کی خدمت میں درخواست ہے کہ مجھے از 02/03/2023 سے یکم مارچ 2024 تک E/Leave دینے کی احکامات جاری کیں تو عین نوازش ہوگی۔

العارض

تابع فرمان ٹیچر نجم الہدٰ SST سکول ہذا

Forwarded to DEO (F)

E&SE/ Edu Buner for

Further n/a please

ATTESTED

حکومت پنجاب سیکریٹری ایجوکیشن اینڈ سائنس لکھنؤ ایجوکیشن ٹیبلڈ جیٹون فوآہ لکھنؤ  
through proper channels  
سکھانہ ایپل سرولاف ڈوم 401A-1137 فورڈ 20-10-13 جس کے روس ایڈوانٹ  
کی نلازوت بلا قانون حوالہ بدبستی و بنا فوشس اور لبر سے ایڈوانٹ غیر قانونی  
وغیر شرعی طور پر ہر طرف کر دی ہے جو کہ حقوق ایڈوانٹ پر غیر درست  
میںہ نامعلوم قابل سوکر تاریخ از اورداء 20/10/13 ہے۔  
جانب عالی!

سیر ۳ عنوان بارا محتاج ایڈوانٹ حسب ذیل مرقع ہے۔

۱۔ بیگم ایڈوانٹ BARBED پاس ہے۔ اور سال 1996 میں ایجوکیشن س۔ ٹی۔ جی یوسٹ میں ہی  
کئی جو کہ پورس promotion کے بنیاد پر (S.T.G) یوسٹ میں سکول سٹارڈم (ہائی)  
میں تفصیلات تھی۔

۲۔ بیگم ایڈوانٹ کل دوران ولازوت 25 سال 76ء ہے۔ اور اس کی پوری دورانیہ میں ایڈوانٹ  
اپنی حقومی اور عدالتی حکام کی اطمینان کے تحت اپنی حوالوں سے حقین طریق سے سرانجام دیا  
کر تا حال ایڈوانٹ کوئی بھی حکمانہ استفسار ماروئی عمل میں نہیں لائی ہے۔  
اور نہ ہی کوئی وارنٹ وغیرہ دی جا چکی ہے۔

۳۔ بیگم ایڈوانٹ کے حملہ سابقہ دورانہ ملازوت ایڈوانٹ کی جس ماہر رٹس اور حافر  
باشن کی بیسہ سال ہے۔ مگر یہ قسمی سے ایڈوانٹ کو گورنری حالات اور جموں  
کے اسباب کی وجہ سے اپنا حوالوں انجام دینا مشعل تکد نامکون تھا۔ یہیں وہ  
ایڈوانٹ کے ایک درخواست نامت (S.T.G) دی اور یا جو کلما از روئے قانون  
ایڈوانٹ کے حق میں تھی (درخواست لگا ہے)۔

۴۔ بیگم ایڈوانٹ کی۔ لکھنؤ ڈاؤنٹ سہ وافر قدار میں تھیں جو جو ہے۔  
کیونکہ ایڈوانٹ قبل ازیں کوئی چھی نہیں ہی ہے۔ یہیں سب ایڈوانٹ  
ملکین تھی۔ کہ چھی منظور ہوئی۔

۵۔ بیگم ایڈوانٹ (DECF) پوریا ڈاؤنٹ میں ۱۰-۲۰۰۰ء میں تعلیم پنجاب والا کے  
جانب سے کوئی بھی اہلام یا نوٹس اسے نسبت نہیں ملی ہے۔ یہیں اب ایڈوانٹ  
کو درخواست چھی طور نہیں لائی ہے۔

بلکہ فلسفہ تعلیمی دفتر میں دو تین بار پورے پورے درخواست ایلوٹیشن کے منظر پر کامیابی کا اعتراف کیا جا رہا ہے۔

اسی لیے کہ ایلوٹیشن انڈری حالات تکفل سے منظور سے اور ایلوٹیشن کی وزارت خود اس عسما  
آکٹوٹی میں سے مذکورہ ہضار جس کو غیر حاضری انفرنگ ٹی سے منظور فرما کر  
کامٹ دس جائے اور حکم مابت سرہا سٹیڈی *Discontinued from service* (السی) کے تحت  
کلیونڈ حکم منظور و ترقی علیہ قانونی مہنتی سر رہتی اور وہ یہ ملے ہوئے ہے۔

اس لیے کہ ایلوٹیشن کے ملازمت دورانہ پوری ہو چکی تھی اس وجہ سے ایلوٹیشن نے  
مابت ریٹائرمنٹ کیے درخواست دینا ہوتا تھا۔ مگر حکم کے اس سے ریٹائرمنٹ  
مذہبے کام شروع کر اور درخواست مابت ہضیاں دینے کو کہا۔ اس وجہ سے ایلوٹیشن  
نے درخواست مابت *ELCWA* دی۔

یہاں سے کہہ سکتے ہیں کہ یہ ہضیاں ایلوٹیشن کو توری  
تورن سندھ 13/10 سے بحال کی جائے حکم مابت مہنتی  
ایلوٹیشن کو دالیں کی جائے۔

عملہ مراعات ایلوٹیشن مابتیں اور حکم رہا اعتراف کو  
بحال کی جائے۔

*Chaudhary*

ایلوٹیشن محکمہ ایلوٹیشن آئی۔ سی۔

تاریخ 04/11/2022

ATTESTED

*(Signature)*

And C1

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**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

- 1 WHEREAS, Miss Najmul Huda SST-G BPS-16 GGHS Shadam Buner was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for unauthorized absence w.e.f 01-03-2022 till date without any permission.
- 2 AND WHEREAS, the DEO (F) Buner submitted her absence report that the teacher concerned remains absent from her duty w.e.f 01-03-2022 till date without any prior approval of the Competent Authority vide No. 4231 dated: 16-03-2022.
- 3 AND WHEREAS, this office asked the DEO (Female) Buner to served showcause to her home address vide No. 4935 dated: 30-03-2022. And the DEO (F) Buner issue showcause notice on her home address vide No. 4639-40 dated: 11-05-2022 followed by 2<sup>nd</sup> showcause notice vide No. 5194 dated: 13-04-2022.
- 4 AND WHEREAS, the DEO (F) Buner Submitted report accordingly vide her office No 14 dated 01-07-2022. This office conveyed to the DEO (Female) Buner to serve absent notice in two leading newspapers on the behalf of the directorate vide No. 4935 dated: 30-03-2022.
- 5 AND WHEREAS, the DEO (F) Buner issued absent notices in two leading newspaper and submitted the report to this office vide her office No.654 dated: 08-09-2022.

NOW THEREFORE, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, the Director E&SE Khyber Pakhtunkhwa as the Competent Authority is pleased to impose the major penalty of "Removal from service" upon Miss Najmul Huda SST-G BPS-16 GGHS Shadam Buner, as specified in Rule-4 (b) (iii) of the Rules ibid with the date of her absence in the interest of public service.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Indst. No. 1137-40 /A-17/PF/Najmul Huda/SST/Buner. Dated: 13/10/2022  
Copy forwarded for information and necessary action to the:-

1. District Education Officer (F) Buner
2. District Accounts Officer Buner.
3. Principal/HM GGHS Shadam Buner.
4. Miss Najmul Huda SST-G BPS-16 GGHS Shadam Buner.
5. Master file.

**ATTESTED**

Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

12/10/22



(Better Copy)

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

Published by Authority

NOTIFICATION:

1. Whereas, Miss Najmul Hada SST-G, BPS-16 GGHSS Shadam Buner was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for unauthorized absence w.e.f 01/03/2022 till date without any permission.
2. And whereas, the EDO (F) Buner submitted her absence report that the teacher concerned remains absent from her duty w.e.f 01/03/2022 till dated without any prior approval of the Competent Authority vide No. 4231 dated 16/03/2022.
3. And whereas, this office asked the EDO (Female) Buner to served showcause to her home address vide No. 4935 dated 30/03/2022. And the DEO (F) Buner issued showcause notice on her home address vide No. 4639-40 dated 11/05/2022 followed by 2<sup>nd</sup> showcuase notice vide No. 5494 dated 13/04/2022.
4. And whereas the DEO (F) Buner Submitted report accordingly vide her office No. 14 dated 01/07/2022. This office conveyed to the DEO (Female) Buner to serve absence notice into leading newspapers on the bailiff of the directorate vide No. 4935 dated 30/03/2022.
5. And whereas, the DEO (F) Buner issued absent notice in two leading newspaper and submitted the report to this office vide her office No. 654 dated 08/09/2022.

Now therefore, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011, the Director E&SE Khyber Pakhtunkhwa as the Competent Authority is pleased to impose the major penalty of "Removal from service" upon Mis Najmul Huda SST-G BPS-16 GGHSS Shadam Buner, as specified in Rule-4 (b) (iii) of the Rules ibid with the date of her absence in the interest of public service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst: No. 1137-40/A-17/PF/Najmul Huda/ SST/ Buner Dated: 13/10/2022

Copy forwarded for information and necessary action to the:-

1. District Education Officer (F) Buner.
2. District Accounts Officer Buner.
3. Principal/ HM GGHSS Shadam Buner.
4. Miss Najmul Huda SST-G BPS-16 GGHS Shadam Buner.
5. Master file

Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

**ATTESTED**





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**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARITE PESHWAR**  
**(PHONE NO. 091-9223587)**

No. SO(PE)/E&SED/5-19/Re-instatement/2022

Dated Peshawar the December 14<sup>th</sup>, 2022

To

Mst. Najmul-Huda,  
Ex-SST (Gen),  
GGHSS, Shadam District Bunir.

Subject: - **PERSONAL HEARING**


I am directed to refer to the subject noted above and to state that personal hearing has been fixed on December 20<sup>th</sup> 2022 at 11:00 AM in the office of Additional Secretary (Estab), E&SE Department.

You are, therefore, directed to attend the said personal hearing on date, time and venue above.

  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY)

Copy forwarded to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar is requested to depute your representative to attend the said personal hearing previously personal hearing was not attended from your side which was held on 14<sup>th</sup> December 2022.
2. District Education Officer (F), Bunir to depute well conversant officer/ official to attend the above personal hearing on date, time & venue as mentioned above, previously personal hearing was not attended from your office representative which was held on 14<sup>th</sup> December 2022.
3. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
4. PA to AS (Establishment), E&SE Department, Khyber Pakhtunkhwa.

**ATTESTED**  


  
SECTION OFFICER (PRIMARY)  
14/12/22



Amr 10

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARITE PESHWAR**  
(PHONE NO. 091-9223587)

(14)

No. SO/PE/E&SED/5-19/Re-instatement/2022

Dated Peshawar the December 9<sup>th</sup>, 2022

To

Mst. Najmul-Huda,  
Ex-SST (Gen),  
GGHSS, Shadam District Bunir.

Subject: PERSONAL HEARING

I am directed to refer to the subject noted above and to state that personal hearing has been fixed on December 14<sup>th</sup> 2022 (Monday) at 11:00 AM in the office of Additional Secretary (Estab), E&SE Department.

You are, therefore, directed to attend the said personal hearing on date, time and venue above.

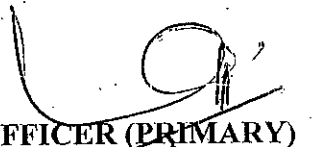
  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY)

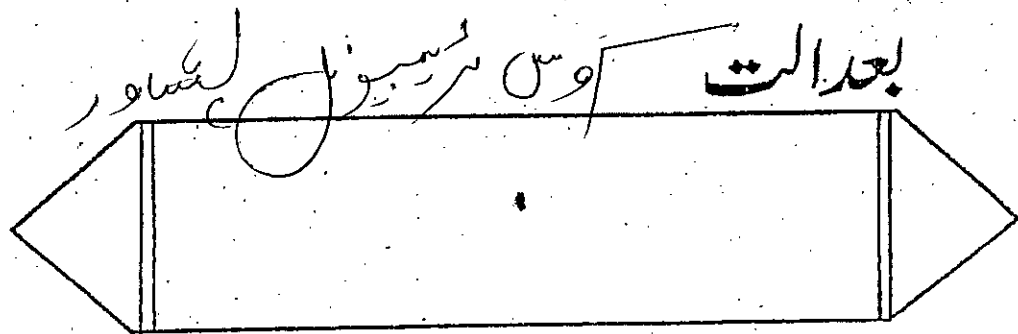
Copy forwarded to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar is requested to depute your representative to attend the said personal hearing.
2. District Education Officer (F), Bunir to depute well conversant officer/ official to attend the above personal hearing on date, time & venue as mentioned above.
3. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
4. PA to AS (Establishment), E&SE Department, Khyber Pakhtunkhwa.

**ATTESTED** SECTION OFFICER (PRIMARY)



  
9/12/22



2 مخائب

DEO  
Buner

Najmul Huda بنام

موزخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام \_\_\_\_\_ کیلئے \_\_\_\_\_ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلاف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم \_\_\_\_\_ ماہ \_\_\_\_\_ 20

\_\_\_\_\_ گواہ \_\_\_\_\_

بمقام \_\_\_\_\_ کے لئے منظور ہے۔

(M)

ATTESTED

Mob 0346 9014199

Mushtaq Ahmad Khan Adv

Najmul Huda d/o Saif Farosh

(Najmul)