

720/2015

Nighat Shakeen vs Govt

03.11.2016

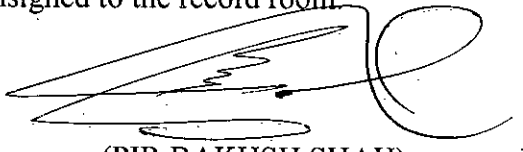
Junior to counsel for the appellant, Ms. Naghmana Sardar, DEO (F) Swabi in person, Mr. Khurshid Khan, SO and Mr. Hameed-ur-Rehman, alongwith Mr. Muhammad Jan, Government Pleader for respondents present. It was stated that the appellant is on the way from Lahore to Peshawar. Ms. Naghmana Sardar, DEO (F) Swabi stated that the appellant went abroad without permission of the department and that she seems to be still abroad as she never reported her arrival back. This appeal is for the following prayer:-

“It is, therefore, humbly prayed that on acceptance of this service appeal the respondents may graciously be directed to allow the appellant to resume her duties and continue it with all back benefits and payment of salaries till her retirement”.

Since the question of resumption of duty is involved, therefore, in the stated situation, the appellant is directed to report personally to the office of DEO (F) Swabi within a week positively for further necessary steps in the matter. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
03.11.2016


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

21.07.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Additional AG for the respondents present. Comments on behalf of respondents submitted which is placed on file. Meanwhile copy of notice as directed on 23.5.2016 be provided to the respondents for reply on the said application as well as arguments. The appeal may be placed before D.B for rejoinder and final hearing for ~~01-11-2016~~ 2016. The Chairman may assign the appeal to appropriate D.B.


MEMBER

01.11.2016

Mr. Sajid Amin, Advocate for appellant and Mr. Amjid Ali, Assistant alongwith Mr. Muhammad Jan, GP for respondents present. Learned counsel for the appellant submitted that on expiry of leave of the appellant, the respondents are reluctant to adjust appellant on any post nor retiring her despite her service for 27 years. He also requested that DEO (F) Swabi may be personally summoned so that the issue may be promptly settled. In view of the nature of the appeal we direct that DEO (F) Swabi should appear in person alongwith relevant record. To come up for further proceedings on 3-11-16 before D.B.


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

22.02.2016

Counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) and Jamshid Khan, Supdt. alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 26.4.2016 before S.B.


Chairman

26.4.2016

Counsel for the appellant and Jamshid Khan, Supdt. alongwith Addl: A.G for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 21.7.2016 before S.B.


Chairman

23.5.2016

Counsel for the appellant requested for requisition of the main appeal for to-day. File has been requisitioned.

Counsel for the appellant submitted an application for placing on record show cause notice published in daily Aaj dated 06.05.2016. Notice of application be issued to the respondents for the date fixed i.e. 21.07.2016 before S.B.


Chairman

02.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as PET in the year 1986. That it was in the year 2009 when the appellant applied for one month leave, however, she was directed to proceed on leave with effect from 15.12.2009 to 15.12.2011. That there-after appellant submitted applications dated 20.11.2011 followed by another application dated 14.2.2012 and then another application dated 6.10.2012 for her adjustment on duty but neither the appellant was adjusted nor any appropriate order passed. That feeling aggrieved appellant preferred departmental appeal on 16.3.2015 which was not responded and hence the instant service appeal on 22.6.2015.

1105-1000

That the respondents are withholding the pay of appellant without any lawful justification.

1105-1000

Point urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 15.10.2015 before S.B.

15.10.2015

Since 15.10.2015 has been declared as public holiday on account of 1st Muharram-ul-Haram, therefore, case is adjourned to 22-12-15 for the same.

[Signature]
Reader

22.12.2015

Counsel for the appellant present. Security and process fee not deposited. The same be deposited within a week, where-after notices be issued to the respondents for written reply/comments for 22.2.2016 before S.B.



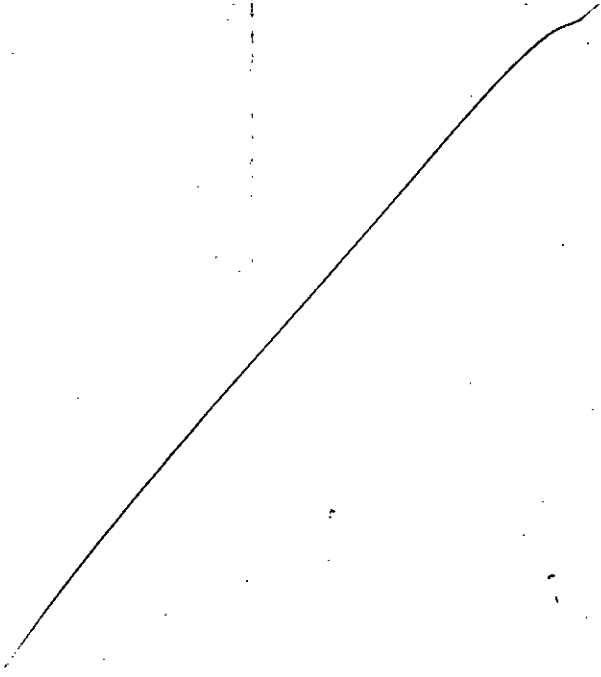
Appellant Deposited
Security & Process Fee

[Signature]
Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 720 /2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.06.2015	<p style="text-align: center;">The appeal of Mst. Nighat Shaheen resubmitted today by Mr. Abid Ali Khan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	30-6-15	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>2-7-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p> 

The appeal of Mst. Nighat Shaheen PET GGPS Zaida Tehsil and Swabi received to-day i.e. on 22.06.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of respondent No. 5 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1975.
- 2- Copy of pay roll mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 4- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 980 /S.T,

Dt. 22/6 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muzammil Khan Adv. Pesh.

Resubmitted on 25-6-2015 after
correction of address of Respondent No. 5 wherein
Pay roll are available at Page No 26 to 28
while copy of departmental appeal is
available at Page No 41 of the appeal.

Abid

BEFORE KPK SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No: 720 / 2015

Nighat Shaheen

Versus

Govt. of K.P.K etc.

INDEX

S.No	Description of Document	Annexure	Pages
1	Memo of appeal		1-6
2	Affidavit		7
3	Copy of some partition of service book	A	8-16
4	Employee profile	B	17
5	Application for increments for the untrained period	C	18-22
6	GP Fund statement for the year 2004-05	D	23-25
7	Pay Rolls 2007-2009	E	26-28
8	Selection Grade	F	29-30
9	Leave sanction order dt 6.1.2010	G	31
10	Applciation for joining duty dt 20.11.2011	H	32
11	Application for joining duty dt 14.2.2012	I	33
12	Application for adjustment dt 6.10.2012	J	34
13	Notice/letter for joining dt 13.1.2015	K	35
14	Reply to letter dt 13.01.2015	L	36
15	Copy of attendance register February March 2015	M	37-38
16	Detail submitted to enquiry officer	N	39-40
17	Departmental appeal dt 16.03.2015	O	41
18	Wakalatnama		

Nighat Shaheen
Appellant,

Through:

Muzammil Khan
Muzammil Khan

Advocate Supreme Court of Pakistan

Safdar Ali Khan
Barister Safdar Ali Khan

Advocate High Court

Abid Ali
Abid Ali

Advocate High Court

(1)

BEFORE THE KPK SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No: 720 / 2015

A.W.F. Province
Service Tribunal

Diary No. 732

Dated 22/6/2015

Nighat Shaheen

P.E.T Govt. Girls Primary School Zaida, Tehsil and District
Swabi Appellant

Versus

1. Government of KPK through Secretary S & Education Civil Secretariat, Peshawar.
2. Director Secondary and Elementary Education, KPK, Dabgari Garden, Peshawar.
3. District Education Officer (F) Swabi
4. Sub Divisional Education Officer (F) Swabi.
5. Principal Government Girls Primary School No. 3 Zaida, Tehsil and District Swabi Respondents

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, AGAINST THE REUSAL/ LONG SILENCE OF THE RESPONDANTS TO ALLOW THE APPELANT TO RESUME HER DUTIES, CONTINUE THEREWITH AND COMPLETE HER SERVICES IN THE PUBLIC INTREST BEING BONAFIDE EMPLOYEE OF THE EDUCATION DEPARTMENT AND RELEASE OF MONTHLY SALRIES FOR THE PRESENT AS WELL AS PAST DURING SANCTIONED LEAVE.

Filed to-day

[Signature]
22/6/15
Prayer:

re-submitted to-day
and filed.

[Signature]
Registrar

On acceptance of this service appeal the impugned refusal/silence of the respondents may graciously be set aside/declared as void ab-initio without lawful authority, allowing the appellant to resume her duties and continue the same till her retirement and release of salaries with all back benefits.

26/6/15

②

Respectfully Sheweth,

Short facts, giving rise to the present Service Appeal, are as under:

- A. That, the appellant was appointed as P.E.T in the respondent department on 22.09.1986 and she put-in meritorious service to the satisfaction of her superiors at various schools with in the district (copy of some portion of service book, profile of the employee, applications, GP Fund statement, pay roll and selection grad showing active service of the appellant are annexed as annexure "A" to "F").
- B. That while posting at Government Girls Primary School Shamansoor, she made a request to competent authority for one month leave which was not only accepted rather the appellant was directed to proceed on two years leave one with pay while one year as without pay although the appellant refused but it being in her favour the appellant offered to proceed on leave and went to Kamra Airbase with her husband and kids availing leave with the permission of the competent authority as well as on her own will (copy of leave sanction order is annexed as annexure "G").
- C. That one month prior to the expiry of the said leave she approached the competent authority to join her duties at the school wherefrom she had proceeded on leave w.e.f 15-12-2009 to 14-12-2011 but the appellant came to know that awarding her leave with pay was intentional by the then DEO female because she was interested in adjustment of daughter of one of sub divisional education officers namely Ali Haider and as such she was ordered to wait for some time. (Copy of the application for joining dated 20.11.2011 and 14.02.2012 are annexed as annexure H & I).
- D. That the appellant waited for long one month but even then she was not adjusted against her original post rather she was kept on waiting and her resumption of charge was delayed on one pretext or the other with no payment of salary in spite of attending GGPS Shahmansoor No.1.
- E. That the appellant moved a written application before the then DEO female Swabi but with no response rather she was not allowed to join the duties just to prolong the service of the daughter of the then Sub Divisional Educational Officer against the vacant post of the appellant who was basically inducted against leave vacancy..

- F. That the appellant was kept on waiting for long six months and no reply whatsoever was given to her representation and as such she was once again directed to wait or avail another year of leave but without any sanction therefrom or salary for the same while the earlier was also outstanding.

- G. That the appellant moved applications before high-ups but with no response rather the whole exercise by the respondent was politically motivated and she was kept on waiting.

- H. That once she was ordered to join and she performed her duties for long two months but without any pay and allowances and no charge resumption order was even issued by the then DEO female Swabi. (Copy of the application dated 6.10.2012 is annexed as annexure J)

- I. That ultimately she moved an application in the month of December 2014 before DEO(F), which was responded with a notice/letter dated: 13-01-2015 to immediately join your service otherwise disciplinary action will be taken against you (copy of the notice/letter dated 13.01.2012 is annexed as annexure "K").

- J. That in response to the said letter by Sub Divisional Officer Female Swabi the appellant not only rush to join her duties but also submitted a written reply thanking the Sub Divisional Educational Officer Female as well as appeared in person and asked for resumption order (copy of the reply dt 23.01.2015 is annexed as annexure "L").

- K. That instead of giving order in black and white she was directed orally to join at Government Girls Primary School No.3 Zaida.

- L. That the appellant joined happily with thanks to all and sundry and started her duties with effect from 02-02-2015 at Government Girls' Primary School Zaida

- M. That the Appellant was regularly attending her duties, marking attendance in the attendance sheets/register and during this period an inquiry committee was also constituted by the DEO (F) Swabi to examine the whole matter and redress grievance of the appellant(copy of the attendance register is annexed as annexure "M").

- N. That the inquiry officer Miss Fatma Batool Headmistress Government Higher Secondary School Bhamkheel visited the Government Girls Primary School Zaida and conducted inquiry in the presence of another lady, with her at GPS No.3 Zaida.
- O. That a long questionnaire was given which was duly replied too and each and every answer was given (Copy of detail given to enquiry officer is annexed as annexure "N")
- P. That she was ordered to continue with her services and in the meanwhile the inquiry officer will submit her report and fate of the appellant services will be decided soon.
- Q. That reportedly the inquiry officer has submitted her report but in spite thereof no order whatsoever was passed by the competent authority regarding deciding the fate of the appellant rather she is yet kept on waiting and as such disappointing therefrom the appellant moved departmental appeal dated 16.3.2015 either to decide her fate once for all, pay salary of the appellant alongwith back benefits otherwise she will opt for pension.(copy of departmental appeal is annexed as annexure "O").
- R. That on inquiry time and again from the DEO female Swabi the appellant was informed that another inquiry officer has been appointed who will conduct the inquiry and will submit the inquiry report but with no such response till now rather the appellant applications before the DEO also bore no fruits.
- S. That appellant has put in long 23 years regular service in the education department, proceeded on leave on the direction of her high-ups and through their tactics they have manipulated to deprive her from the benefits of her service because no response was given from any high-ups till date while her absence has been prolonged from two years to five years by now without any fault of the appellant.
- T. That the appellant has no remedy but to approach this honourable Tribunal against the non passing of any order and long silence of the respondents on the representation of the appellant allowing her to join duties, release pay and allowances present and past, hence, this Service Appeal on the following amongst other grounds: -

GROUNDS:

1. That non allowing the appellant to resume her duties at the work place of the appellant i.e. Government Girls Primary School Shamansoor and the long silence of the respondents tantamounts to sheer negligence shirking from their duties and depriving the appellant from her bonafide service in a totally unwarranted manner. The very act of the Respondents is illegal, unlawful, void ab-initio and without jurisdiction.
2. That the appellant being bonafide employee of the education department, has served the department with full faith and devotion for long 22/23 years. Her request for one month leave and its prolongation by the department itself speaks malafide of the then authorities that is respondents and just to favour the blue eyed incumbent at the relevant time.
3. That the appellant has every right to reap the usufruct of her long service in the shape of retirement as provided under section 13 of the Khyber Pokhtoon Khwa Civil Servant Act 1973 or in alternative she has every right to be allowed to complete her 25 years services which is otherwise considered as qualifying service rather under the law qualifying service has been determined as 20 years as is evident from the section ibid which was made through an amendment in the Civil Servant Act in the year 2001.
4. That the respondents at the helms of affairs at Swabi do not know the consequences of their negligence and till date prolonging absence of the appellant for no cogent reason rather they would be held responsible if this Honourable Tribunal appreciate the facts of the case and law on the subject.
5. That long silence of the director education and other high-ups is also tantamount to negligence and shirking of their duties rather is a clear cut manifestation of mismanagement in the education department otherwise the respondents should have allowed the appellant to resume her duties on the expiry of her leave least to say that she has applied for resumption of charge one month prior to the expiry of her leave.

6

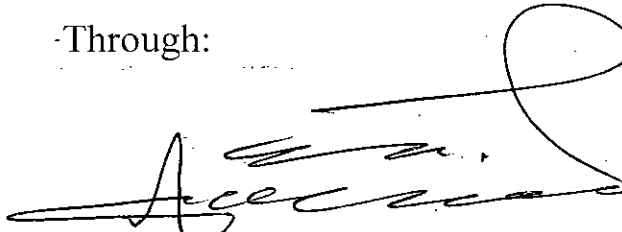
6. That by now non allowing the appellant to resume her duties or deciding the fate of the appellant by the respondents is also violation of law, rules and the mandatory provisions of constitutions because she can not be deprived of her bonafide service and benefits therefrom in the manner not provided in the law rather the constitution gives protection to the appellant in any manner whatsoever.
7. That the appellant has every right to be allowed to resume her duties or to be awarded retirement benefits as provided in the act ibid and as such this Honourable Tribunal has every jurisdiction to decide the matter once for all.

It is, therefore, humbly prayed that on acceptance of this service appeal the respondents may graciously be directed to allow the appellant to resume her duties and continue it with all back benefits and payment of salaries till her retirement.

Any other order deem appropriate in the circumstances of the case may also be passed in the interest of justice


Appellant,

Through:



Muzammil Khan
Advocate Supreme Court of Pakistan


Barrister Safdar Ali Khan
Advocate High Court


Abid Ali
Advocate High Court

7

BEFORE KPK SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No: _____ / 2015

Nighat Shaheen

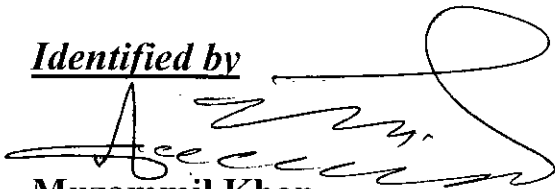
Versus

Govt. of K.P.K etc.

AFFIDAVIT

I, Nighat Shaheen PET, appellant do hereby on oath affirm and declare on oath that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.

Identified by



Muzammil Khan

Advocate Supreme Court of Pakistan



Nighat Shaheen
Deponent

نگاہت شاہ حسین

جانبی سی

گورنمنٹ لائبریری برائے شاہ حسین
شاہ حسین
پتہ: اورنگ آباد

پتہ: اورنگ آباد

(For use in Police Department only).

BA

Hairs,

- 1.
- 2.
- 3.

Verification Roll No. _____ dated _____ received back.

③ Passed Intermediate Exam: Session, 1993. (Annual)
 From Board of Intermediate & Secondary Education
 Peshawar under Roll No. 41295 obtaining 465/1100 marks
 and Grade (D) Third Division. Result declared on 04-11-1993
 Left thumb-impression.

Qualification	Date	Qualifications	Date
English		First Arts	
Pashtu		B. L. or B. A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
② Drill instructor	Passed PTC Examination from the R.D.E. Peshawar under Roll No. 433	① Passed SSC exams in (A) 1983, under Roll No. 26498, by obtaining 465/850 marks and placed in Grade "C"	
Court duties	obtaining marks 189 out of 400 - Result declared.		
Reserve duties	01-16-4-90 ✓		
Sub Div: Edu	Office (Person) Laker	Sub: Div: Education Officer	Female: Mr. [Signature]

N. B.—Aims to be drawn and qualification possessed.

attested
 [Signature]
 Sub Div: P.S. [Signature]
 P.O. & Third Sub
 Peshawar

9

9

Place *Islam / Pakistan*

Residence *Vill: & P.O. Zaida, Teh: Swabi (Mardan)*



Father's name and residence *Mahboob Khan - 00 -*



Date of birth by Christian era as nearly as can be ascertained *1-10-1967 (First: Oct. 11. H. & Sixty Seven)*


Exact height by measurement *5-4"*

Personal marks for identification *Two black moles under right ear.*

Left hand thumb and finger impression of (non-gazetted) officer

Little Finger.  Ring Finger 

Middle Finger.  Fore Finger 

Thumb. 

Signature of Government servant *Nighat Shaheer.*

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

Khulida Adib
Sub-Inspector Office
(Female) Swabi

Attested
Amir

Head Constable P.O. & T.
G.O.B. Thand Kot
Distt. Swabi

10

(9)

8

Name of post	permanent or temporary	(ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	officiating	term Pay	of appointment	Signature of Government servant
P.T.C. Post 44 PS Beema	offg/Temp		Rs. 560/- fixed			22.9.86	Nighat Shaha
do	do	BPS 7	750-31-1370			1.7.87	Nighat Shaha
	750/- fixed with 10% increment	Account Officer 1/3					
P.S. Jehangi Dher							
do	do	781	750/- PM Fixed			4/12/87	Nighat Shaha
do	do	812	750/- Fixed			1/12/88	Nighat Shaha
do	do	843	750/- Fixed			1/12/89	Nighat Shaha
attached	Indent pay	Rs. 750/- (21/12) PM				16/1/90	Nighat Shaha
Amw Sudhakar P.S.S. O.S. Thand Kol Dhru Swam	do pay	Rs. 874	781/2 PM			1/12/90	Nighat Shaha
	Indent pay	Rs. 1/-	22/12 PM			1/12/90	Nighat Shaha

9	10	11	12	13	14	15	
				Leave			
Signature and designation of the head of the office or other attesting officer in columns 1 to 8				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Date of termination of appointment (such as promotion, transfer, dismissal, etc.)					Period	Government to which debit to	
Signature of the head of the office or other attesting officer							
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Appointed against P.T.C. Post on Rs. 560/- per month fixed vide SE O Ld. Nardan's Endt. No. 1836-87/A-4/P.T.C. of 31-8-1986.</p>			
<p>30/6/87</p>				<p>Revision of grade</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Appointed against P.T.C. Post on Rs. 560/- per month fixed vide SE O Ld. Nardan's Endt. No. 1836-87/A-4/P.T.C. of 31-8-1986.</p>			
<p>30/11/87</p>				<p>Emerg. ment.</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Service verified w.e.f. 22.9.86 to 30.11.87 from the acy Roll and other office record</p>			
<p>30/11/88</p>				<p>NO</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Roll and other office record</p>			
<p>30/11/89</p>				<p>NO</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Extra ordinary leave sanctioned vide DEP (F) Swabi No-2033 dtd 29.4.89 w.e.f. 1.3.89 to 25.3.89 (25 days) on full pay.</p>			
<p>7/6/90</p>				<p>Passed P.T.C. exam in June R.D.C. 29</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>all cancelled</p>			
<p>30/11/90</p>				<p>Annual Incr.</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Sub Divisional Education Officer (Femal) Lahor</p>			
<p><i>Adil</i> Sub Div. Edu. Officer (F) Lahor</p>				<p>Sub Divisional Education Officer (Femal) Lahor</p>			

Adil
Sub Div. Edu. Officer (F) Lahor

Adil
Sub Div. Edu. Officer (Femal) Swabi

Service verified w.e.f. 22.9.86 to 30.11.87 from the acy Roll and other office record

Adil
Sub Div. Edu. Officer (Femal) Swabi

Extra ordinary leave sanctioned vide DEP (F) Swabi No-2033 dtd 29.4.89 w.e.f. 1.3.89 to 25.3.89 (25 days) on full pay.

Adil
Sub Divisional Education Officer (Femal) Lahor

Adil
Sub Div. Edu. Officer (Femal) Swabi

6

12

6

1	2	3	4	5	6	7	8
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

SRPS: -
 Jangji Dheer pay Rs. 781/- PM 31.5.91 night Shaker

G pay Rs. 1275/- PM 1.6.91 night Shaker

S Rs. 1335/- PM 1.12.91 night Shaker

Office of the Accountant General
 N.W.F.P. Peshawar
 Pay fixed in the Revised Pay Scale 1991
 of Rs. 1095/- 60 - 1995
 @ Rs. 1275/- P.M.W.F.P. 1991
 With Next Increment on 1-12-1991

Accounts
 Assmt. Accountant
 N.W.F.P. Peshawar

OTC
 SRPS Jangji Dheer
 OH/Temp B. 1395/- PM 1-12-92 night Shaker

SRPS Zaidan No-5 do B. 1395/- 10/12/92 night Shaker

do do B. 1455/- 1/93 night Shaker

~~do do B. 1395/- PM 10/12/92 night Shaker~~

~~do do B. 1515/- PM 04/11/92 night Shaker~~

~~do do B. 1575/- PM 1/12/92 night Shaker~~

~~do do B. 1635/- PM 1/12/93 night Shaker~~

Adm
 Head Master P.E.
 O.S. Trans. Knt
 Bani Swabi

Approved upto
31.3.96

1	2	3	4	5	6	7	8
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
<u>BPS-7 (Rs. 1480-81-2695)</u>							
PTC at G.P.S. No. 5 Zaida	- do -		Rs. 2209/- PM	-	-	12/94	Nighat Shabir
- do -	cutting attested on pay No. 8 dated 9.15.94		Rs. 2209/- PM	-	-	12/94	Nighat Shabir
- do -			Rs. 2371/- PM	-	-	12/95	Nighat Shabir
<u>(Revised entry in BPS-7 (Rs. 1095-60-1995) Two Advance increment on Passing FA Exam.)</u>							
- do -	Temp. / offing.		Rs. 1515/- PM	-	-	04/1993	✓
- do -	- do -		Rs. 1575/- PM	-	-	12/93	✓
<u>B-7 (Rs. 1480-81-2695)</u>							
- do -	- do -		Rs. 2128/- PM	-	-	6/94	✓
- do -	- do -		Rs. 2209/- PM	-	-	12/94	✓
- do -	- do -		Rs. 2290/- PM	-	-	12/95	✓
<p>attested</p> <p><i>[Signature]</i></p> <p>Head Master P. B. S. G. B. S. Thand Kal Bhili Swabi</p>							

9	10	11	12	13	14	15
				Leave		
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Nature and duration of leave taken	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	
S.O. (F) Swabi.	30/11/94	Annual Increment	S.O. (F) Swabi.	<p style="text-align: center;"><u>Grated Medical Leave</u></p> <p>Leave sanctioned vide D.O. (F) Swabi' Endt No:- 401 dt 27.3.91 Medical Leave W.C. F. B/2-90 13-2-91 & 15-2-91.</p> <p style="text-align: right;">SDFO (F) Lahor. Sub Div: Edul Off: (F) Lahor Swabi</p> <p style="text-align: center;">Service verified w.e.f 1-12-90 to 30-11-92 from the Reg Roll and other record of this office.</p> <p style="text-align: center;">Service verified w.e.f 1-12-92 to 9-12-92 from the Reg. Roll and other record of this office.</p> <p style="text-align: center;">Service verified w.e.f. 10/12/92 to 30/11/93 from The Reg. Roll and other record from this office.</p> <p style="text-align: right;">Sub Div: Edul Office Femal Swabi.</p>		
S.O. (F) Swabi.	30/11/95	Annual Increment	S.O. (F) Swabi.			
S.O. (F) Swabi.	30/5/94	Remission of pay scales.				
	30/11/93	Annual Increment.				
	30/5/94	Remission of pay scales.				
	30/11/94	Annual Increment.				
	30/11/95	Annual Increment.				
<p style="font-size: 2em; font-weight: bold;">Attested</p> <p style="font-size: 2em; font-weight: bold;">L M W</p> <p style="font-size: 0.8em;">Head Master P.S.O. S. Strand Roll Swabi</p>						

(16)

Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit 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 debit		
				<p>Conceded Maternity leave From 17.9.1993 To 31-10-93 (45 days) on full pay with DEO(F) Primary School No. 2710-11/K. Sanctioned AE/Paid 6/7/1994.</p>			
				<p>Granted Maternity leave from 15¹¹/₉₅ to 20¹/₉₅ (67 days) & 21¹/₉₅ to 26²/₉₅ (27 days) on full pay with DEO(F) P.S. S. li. Brod. K. B. 1692-94 / dt. 13-6-95</p>			

Sub Div. Officer
Swabi. d.

Sub Div. Officer
Swabi

Services received up to 1.12.93
To 30.11.95 from the office.

Records
attached

S.D.E. Swabi

Handwritten signature
Post Model P.S. S. li. Brod. K. B. Swabi

17

EMPLOYEE PROFILE

Photograph
Annex-B

This Form has to be filled by all government employees.
Please use CAPITAL LETTERS only. Use ✓ where appropriate.
Write 'NA' where not applicable. In case the employee is on leave or
Absent, then officer in charge to the best of his knowledge should fill this form.

Name of Department: EDUCATION

District: SWABI

Status: Permanent

Daily wages

Contingent paid

Adhoc

Personal

Name in full: NIGHAT SHAHEEN

Gender: M F

Domicile: N.W.F.P. (SWABI)

N.T.C. No. 130-86-563124

Date of birth:

Easypayer: Y N

N.T. No. - -

Marital status: Married

Un-married

No. Of dependants: 03

Spouse's employment status:

Unemployed

Government

Private

Self-employed

Present Posting

Name of Facility: TEACHER

DPS: 07

No. Of increments: 15

Designation: P.T.C.

Place of posting: village/town SHAHMANSOOR union council SHAHMANSOOR Tehsil SWABI

Date of joining: 15-9-2001 (day-month-year)

Present status:

On job

On leave

Absent

Job History

Date of appointment: 22-09-1986 (day-month-year)

Last place of posting: (write in ascending order)

Department	Address	Designation	Date From - To
EDUCATION	G.G.P.S BEKA DIST (SWABI)	P.T.C.	22-9-86 to 30-1-88
	G.G.P.S JANGIDHER "	DO	01-12-88 to 09-12-92
	G.G.P.S NOI ZAIDA "	DO	10-12-92 to 14-9-2001
	G.G.P.S NOI SHAHMANSOOR	DO	05-9-2001 to ONWARDS

Expected date of retirement: 30-9-2027 (day-month-year)

Salary (Present monthly)

Basic pay: Rs 2695/- Allowances: Rs _____ other: Rs _____

Academics/Skills

Please answer this section in ascending order

Qualification/Skill	Institute name & address	Date From - To
SS.C.	G.G.H.S ZAIDA	1983
P.T.C.	R.D.E. PESHAWAR	1990
E.A.	BISE PESHAWAR (PRIVATE)	1993

Field of specialization:

Computer Literate: Y N

Employee's signature

Nighat Shaheen

7

Attc

PHM

کے طور پر صواب ڈیپٹی ڈسٹرکٹ آفسر کے زمانہ فرائض کے دوران
جدا سے جدا

گذشتہ تاریخ کے ہنگامے میں 28/9/20 سے بحیثیت بی بی سی کے
فکر و تامل میں خدمات کے دوران دینا چاہیے اور یہ ہے - تو یہ ایک وقت
ہنگامے میں ڈسٹرکٹ آفسر کے لئے 16/4 کو بی بی سی کے استعفیائی پاس کیا گیا -
اس سے پہلے ان ڈسٹرکٹ آفسر کے دورے سے سالانہ انٹرمیڈیٹ سے
محروم تھے -

خاص یہ حکومتی مفید کے مطابق ہنگامے میں ان ڈسٹرکٹ آفسر کے لئے
سالانہ انٹرمیڈیٹ کا حق دیا گیا ہے - حکم نامے نمبر 3272-9
جو کہ انٹرمیڈیٹ ڈسٹرکٹ آفسر کے حساب سے منظور کیا گیا ہے
اور یہ نقل درج ذیل کے ساتھ منسلک ہے -
1 - یہاں پر ہنگامے میں ہنگامے کو مذکورہ سالہ حکم
کے مطابق ان ڈسٹرکٹ آفسر کے لئے سالانہ انٹرمیڈیٹ کے
حاجتیں -
گذشتہ تاریخ -

سرفہرست 19/10/59

ایک سالہ

تاریخ شاہین

بی بی سی کے لئے

گذشتہ تاریخ کے لئے ہنگامے میں آئیے
کے لئے ہنگامے میں

GOVERNMENT OF NWFP
FINANCE DEPARTMENT
(REGULATION WING)

No. FD(IRC)S-2/2002.
Dated Peshawar, the 30.3.2009.

Mulla Star
Pl circulate among all
the DDOs (Estt) Peshawar
Head Office / Head Office in
District Office

To
The Secretary to Government of NWFP,
Elementary & Secondary Education,
Department.

Subject: GRANT OF ANNUAL INCREMENT/RUNNING PAY TO UNTRAINED
TEACHERS IN THE LIGHT OF SUPREME COURT JUDGEMENT

Dear Sir,
I am directed to refer to your letter No. SO(B&A)/1-16/08/Advance Increment
dated February 27, 2009 on the subject noted above and to state that the Provincial Government is
pleased to allow the benefit of annual increments to the untrained teachers from the date of their
regular appointment

No arrears shall however, be admissible/payable prior to the date of issuance of
this circular

Sd/-
(ABDUL JABBAR)
SECTION OFFICER(SR-I)

Inst. of even Number & Date.

Copy for information & necessary action to the :-

- 1) Accountant General NWFP.
- 2) All District Coordination Officers.
- 3) All District/Agency Accounts Officers NWFP/FATA.

Sd/-
SECTION OFFICER(SR-I)

GOVERNMENT OF NWFP
ELEMENTARY & SECY:EDU: DEPTT:

No. SO-B&A/1-16 Budget 09.
Dated Peshawar, the 6.4.2009.

Inst. of even Number & Date.

Copy of the above is forwarded to :-

- 1) The Director (E&S) Education NWFP Peshawar.
- 2) The Director (ITE) Peshawar.
- 3) The Director Curriculum & Teachers Education Abbottabad.
- 4) All Executive District Officers(E&SE) in NWFP.
- 5) The P.S. to Secretary (E&S) Education Department.

1285
28/4/09

(ABDUL HAMID MARWAT)
SECTION OFFICER(B&A)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, NWFP PESHAWAR.

No. 1535 /F.No.64/Gen Information/GB. Dated Peshawar the 27/4/2009.

Copy of the above is forwarded for necessary action & strict compliance to
the:

- 1-24 All the Executive Distt. Officers (E&SE) in NWFP.
- 25. Section Officer.(B&A) Govt. of NWFP, E&SE Deptt: w/r to his No. cited above for
information, please
- 26 PA to Director Local office.

Assistant Director (Estt)
(E&SE), NWFP, Peshawar.

Recd
27/4/09

P.T.C

Attested
AS

20

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S EDUCATION) SWABI

Arrest No. 3272-5 / Date 12/5/2009

Copy of the above is forwarded to the:-

- 1. All the DDC (Male and Female) (ESSE) Swabi/Lahor/Topi for strict compliance.
- 2. All the Principal/Head Master/Head Mistress GHSS/GHSS/GHS/GHS in district Swabi for strict compliance.
- 3. DDC (ESSE) Male and Female local office for compliance.

[Signature] 6/5/09
 EXECUTIVE DISTRICT OFFICER
 (E & S EDUCATION) SWABI.

Attended
[Signature]

B-7 Rs (560-23-1020)
22-9-86 ——— 560/-

(21)

~~1-12~~
B-7 Rs (750-31-1370)
1-7-87 ——— 750/-

1-12-87 ——— 781/-
1-12-88 ——— 812/-
1-12-89 ——— 843/-
1-12-90 ——— 874/-

B-7 Rs (1095-60-1995)
1-6-91 ——— 1335/-

1-12-91 ——— 1395/-
1-12-92 ——— 1455/-

Q.A. 4-11-93 ——— 1575/-
1-12-93 ——— 1635/-

1-7-94 ——— 2209/-
1-12-94 ——— 2290/-

1-12-95 ——— 2371/-

1-12-96 ——— 2452/-

1-12-97 ——— 2533/-
1-12-98 ——— 2614/-

1-12-98 ~~3000~~ one pre-mature ~~2730~~ 2730/-

1-12-99 ——— 2837/-

1-12-2000 ——— 2944/-

1-12-01 ——— 3051/-

1-12-01 ——— 4570/-

Nighat Shaheer

ADPH: 22-9-86

P.T.C.: 16-4-90

F.A.: 4-11-93

S167 B/L: 1-12-98

one pre-mature.

1-12-02 _____ 4730/- ✓

1-12-03 _____ 4890/- ✓

1-12-04 _____ 5050/- ✓

B-10 RS (2065-185-8415)

1-7-05 _____ 5825/- ✓

1-12-05 _____ 6010/- ✓

1-12-06 _____ 6195/- ✓

B-11 RS (3295-215-9745)

1-7-07 _____ 7165/- ✓

1-12-07 _____ 7380/- ✓

B-12 RS (3630-260-11430)

2-12-07 _____ 7530/- ✓

B-12 RS (4355-310-2000)

1-7-08 _____ 9005/- ✓

1-12-08 _____ 9315/- ✓

9315
9005
310 = 940
310 = 1240
2180

758	758
687	657
101 = 306	101 = 306
101 = 404	101 = 404
710	

929	1863
902	1801
27 = 82	
27 = 168	
	62 = 188
	62 = 248

(A Adv. Just Found)

Smith
20-10-07

2180
716
710
180
3

Annex-D 10

25

130 84 583124
NIGHAT SHAHEEN
P.T.C.

FUND A/C NO. EDUSB003⁰³³
DDO/SUB-DDO 04433-000
BY DISTT. OFFICER (F/P) SWABI

PAYROLL MONTH	MONTHLY SUBS	REFUND OF GPF ADV	WITHDRAWALS	PROGRESSIVE BALANCE
JULY	205			5,085
AUGUST	205			5,270
SEPTEMBER	205			5,475
OCTOBER	205			5,680
NOVEMBER	205			5,885
DECEMBER	205			6,090
JANUARY	205			6,295
FEBRUARY	205			6,500
MARCH	205			6,705
APRIL	205			6,910
MAY	205			7,115
JUNE	205			7,320
TOTAL	2,460			74,310

Handwritten signature

OPENING BALANCE		4,860
TOTAL DEPOSITS		2,460
PROFIT	12.00	743
BONUS	00.00	0
		8,063
TOTAL LESS WITHDRAWALS		0
CLOSING BALANCE		8,063

8,063

NOTE: Any error or omission should be brought to the notice of the undersigned within 3 months from the receipt of this statement.

ASSTT. Accountant General
ACCOUNTS OFFICER



PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

FURNISHED BY

Date: 1-4-09

OFFICE OF THE: D.D.O (CF) Swabi

Page No. 2

FOR THE MONTH OF: 4/09 1999

DDO Code (Cost Centre): 846132 Description: Correction of GPF No:

Personal Number: 00234274 Employee Name: Nighat Shahreen

National ID Card No:

Grade/Pay Scale Group: 10 BPS

Salary Status: Start Stop

24

Checked

GENERAL DATA CHANGE			CHANGE IN PAYMENTS / DEDUCTIONS				Effective Date	Remarks
Info Type	Field ID	New Contents	Wage Type	Amount				
				Rupees	Paisa	Adj		
			368	Correct	GPF NO: 3093		1-4-09	The official G.P.F. Number correct 3033 3093 instead of 3033.
				Incorrect	GPF 3033			
				please	GPF 3093 posted instead of 3033			

By: Distt. Officer
Elementary & Secondary Education
(Female) Swabi

Prepared By:

Checked By:

Entered / Verified By:

Date: 1-4-09
Page No.:

OFFICE OF THE D.D.O (CF) Swat

FOR THE MONTH OF 4/09 1909

DDO Code (Cost Center) 346132 Description Correction of GPF No.

Personal Number 00234274 Employee Name Nighat Shaheen

Grade/Pay Scale Group 10 B.P.S.

National ID Card No. Safety Status Start Stop

25

GENERAL DATA CHANGE			CHANGE IN PAYMENTS / DEDUCTIONS				Effective Date	Remarks
Info Type	Field ID's	New Contents	Wage Type	Amount				
				Rupees	Paise	Cent		
			368	Correct	GPF NO:	3093	1-4-09	
			*	Incorrect	GPF	3033		The official
					please	GPF 3093		G.P.F. Number
					posted			Correct 3093
					instead of	3033		3093 instead of
								3033.
								Correct G.P.F. No is
								3093/2 not 3033
								1/58

Approved A

Prepared By

Dy. Distt. Officer
Elementary & Secondary Education
(Female) Swabi

Entered / Verified By

Kind in Computer on 18/4/09

402

17/12/17

CERTIFICATE

It is certified that the funds already released for the following ADP schemes has fully been utilized and no further funds is available in this Division.

S.No	ADP No.	Name of scheme	Funds released	Expenditure
1	52/50179	Estabtt: of Govt: Girls Degree College Panjpir	2354000	2354000

DEPUTY DIRECTOR
WORKS & SERVICES
SWABI

Accounts Office Sahabi
PAYROLL REGISTER
For the month of August, 2007

Page : 3 502
Date : 26.08.2007

Payroll Section : 003 Section 3

DDN : SU6132 DYDISTTOFFICER FP SHABI

Position: Non Gazetted	882.00	3501 Benevolent Fund	35.00-
1000 House Rent Allowance	425.00	3511 Addl Group Insurance	6.00-
1300 Medical Allowance	40.00	3604 Group Insurance	44.00-
1505 Charge Allowance	370.00	3640 Emp.Edu. Fund	4.00-
1770 Spl. Additional allow	603.00		
1830 Special Relief All(2)	603.00		
1831 Adhoc Relief (2005)	740.00		
1864 Dearnes Allowance (2)			

PAYMENTS 9,323.00 DEDUCTIONS 319.00-
Branch Code: Payment through DDO

NET PAY 9,004.00 01.08.2007 - 31.08.2007
Acct.No:

00234259 MOHAMMAD ZAHID
P A Y M E N T S
Prev Pers No: 13086537601 Desig: CHDKIDAR (00000357) Grade: 02 NTN: 0
A M O U N T D E D U C T I O N S A M O U N T L O A N / F U N D Buckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
REPAID BALANCE
GPF#: EDUS0004129 7,053.00

0001 Basic Pay	4,230.00	3002 CPF Subscription - Rs	170.00-
1000 House Rent Allowance	759.00	3501 Benevolent Fund	25.00-
1300 Medical Allowance	425.00	3511 Addl Group Insurance	2.00-
1516 Dress/ Uniform Allow	40.00	3640 Emp.Edu. Fund	3.00-
1567 Washing Allowance	30.00		
1770 Spl. Additional allow	318.00		
1830 Special Relief All(2)	454.00		
1831 Adhoc Relief (2005)	454.00		
1864 Dearnes Allowance (2)	547.00		

PAYMENTS 7,857.00 DEDUCTIONS 200.00-
Branch Code: Payment through DDO

NET PAY 7,057.00 01.08.2007 - 31.08.2007
Acct.No:

00234266 DILSHAD BEGUM
P A Y M E N T S
Prev Pers No: 13086560776 Desig: PRIMARY SCHOOL TEACH(00004018) Grade: 09 NTN: 0
A M O U N T D E D U C T I O N S A M O U N T L O A N / F U N D Buckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
REPAID BALANCE
GPF#: EDUS0002736 18,623.00

0001 Basic Pay	6,225.00	3009 CPF Subscription - Rs	260.00-
1000 House Rent Allowance	955.00	3501 Benevolent Fund	35.00-
1300 Medical Allowance	425.00	3511 Addl Group Insurance	6.00-
1770 Spl. Additional allow	401.00	3604 Group Insurance	44.00-
1830 Special Relief All(2)	666.00	3640 Emp.Edu. Fund	4.00-
1831 Adhoc Relief (2005)	666.00		
1864 Dearnes Allowance (2)	811.00		

PAYMENTS 10,149.00 DEDUCTIONS 349.00-
Branch Code: Payment through DDO

NET PAY 9,800.00 01.08.2007 - 31.08.2007
Acct.No:

00234274 NIGHAT SHAHEEN
P A Y M E N T S
Prev Pers No: 13086583124 Desig: PRIMARY SCHOOL TEACH(00004018) Grade: 10 NTN: 0
A M O U N T D E D U C T I O N S A M O U N T L O A N / F U N D Buckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
REPAID BALANCE
GPF#: EDUS0003033 16,750.00

0001 Basic Pay	6,950.00	3010 CPF Subscription - Rs	280.00-
1000 House Rent Allowance	988.00	3501 Benevolent Fund	35.00-
1300 Medical Allowance	425.00	3511 Addl Group Insurance	6.00-
1770 Spl. Additional allow	415.00	3604 Group Insurance	44.00-
1830 Special Relief All(2)	733.00	3640 Emp.Edu. Fund	4.00-
1831 Adhoc Relief (2005)	733.00		
1864 Dearnes Allowance (2)	901.00		

PAYMENTS 11,145.00 DEDUCTIONS 369.00-
Branch Code: Payment through DDO

NET PAY 10,776.00 01.08.2007 - 31.08.2007
Acct.No:

Annex - E

26

[Handwritten signature]

SUS132 BYDISTOFFICER FP SWADI

Payroll Section - 003 Section 3

Position: Non Gazetted
1831 Adhoc Relief (2005) 733.00
1864 Dearnes Allowance (2) 981.00
1908 Adhoc Relief-2009 (0) 1,881.00

PAYMENTS 15,394.00
Branch Code: 231922 ZAIDA BRANCH

DEDUCTIONS 903.00-
National Bank of Pakistan ZAIDA BRANCH

NET PAY 14,491.00 01.11.2009 30.11.2009
Swabi Acct. No: 817-9

00234208 SHANUL HARA
P A Y M E N T S

Prev Pers No: 13086613301 Desig: PRIMARY SCHOOL TEACH(00004018) Grade: 12 NTN: 0
A M O U N T D E D U C T I O N S A M O U N T L O A N / F U N D

Buckle No.: Gazetted/Non-Gazetted: H
PRINCIPAL REPAID BALANCE

0001 Basic Pay 6,625.00 3012 GPF Subscription - Rs 720.00-
1000 House Rent Allowance 1,306.00 3501 Benevolent Fund 35.00-
1300 Medical Allowance 500.00 3511 Addl Group Insurance 13.00-
1505 Charge Allowance 40.00 3604 Group Insurance 115.00-
1770 Spl. Additional allow 415.00 3640 Emp. Edu. Fund 20.00-
1830 Special Relief All(2) 782.00
1831 Adhoc Relief (2005) 782.00
1864 Dearnes Allowance (2) 957.00
1908 Adhoc Relief-2009 (0) 1,925.00

GPF#: EDUS0000437 37,450.00

PAYMENTS 16,332.00
Branch Code: Payment through DDD

DEDUCTIONS 903.00-
Payment through DDD

NET PAY 15,429.00 01.11.2009 30.11.2009
Acct. No:

00234302 KHALIDA PARVEEN
P A Y M E N T S

Prev Pers No: 13086619948 Desig: PRIMARY SCHOOL TEACH(00004018) Grade: 12 NTN: 0
A M O U N T D E D U C T I O N S A M O U N T L O A N / F U N D

Buckle No.: Gazetted/Non-Gazetted: H
PRINCIPAL REPAID BALANCE

0001 Basic Pay 6,525.00 3012 GPF Subscription - Rs 720.00-
1000 House Rent Allowance 1,306.00 6505 GPF Loan Principal In 1,083.00-
1300 Medical Allowance 500.00 3501 Benevolent Fund 35.00-
1505 Charge Allowance 40.00 3511 Addl Group Insurance 13.00-
1770 Spl. Additional allow 370.00 3604 Group Insurance 115.00-
1830 Special Relief All(2) 531.00 3640 Emp. Edu. Fund 20.00-
1831 Adhoc Relief (2005) 531.00
1864 Dearnes Allowance (2) 656.00
1908 Adhoc Relief-2009 (0) 1,305.00

GPF#: EDUS0002467 38,988.00 10,830.00 36,466.00
0368 28,158.00

PAYMENTS 11,764.00
Branch Code: Payment through DDD

DEDUCTIONS 1,986.00-
Payment through DDD

NET PAY 9,778.00 01.11.2009 30.11.2009
Acct. No:

00234338 RAHMAT ALI
P A Y M E N T S

Prev Pers No: 13087011065 Desig: CHOWRIDAR (00000357) Grade: 02 NTN: 0
A M O U N T D E D U C T I O N S A M O U N T L O A N / F U N D

Buckle No.: Gazetted/Non-Gazetted: H
PRINCIPAL REPAID BALANCE

0001 Basic Pay 5,335.00 3002 GPF Subscription - Rs 230.00-
1000 House Rent Allowance 910.00 3501 Benevolent Fund 25.00-
1300 Medical Allowance 500.00 3511 Addl Group Insurance 3.00-
1516 Dress/ Uniform Allow 40.00 3604 Group Insurance 58.00-
1567 Washing Allowance 30.00 3640 Emp. Edu. Fund 10.00-
1770 Spl. Additional allow 311.00
1830 Special Relief All(2) 454.00
1831 Adhoc Relief (2005) 454.00
1864 Dearnes Allowance (2) 547.00
1908 Adhoc Relief-2009 (0) 1,067.00

GPF#: EDUS0002531 14,659.00

PAYMENTS 9,648.00
Branch Code: 231870 TORLANDAI BRANCH SHWA ADA SWABI

DEDUCTIONS 326.00-
National Bank of Pakistan TORLANDAI BRANCH SHWA ADA SWABISWABI

NET PAY 9,322.00 01.11.2009 30.11.2009
Acct. No: 1709-1

[Handwritten signature]

AWARD OF SELECTION GRADE.

In pursuance of the decision of the Departmental Promotion Committee held on: 29-12-2004 under the Chairmanship of District Co-Ordination Officer Swabi. The following PTC (Female) mistresses working in BPS-07 are hereby placed in the selection grade to BPS-10 (Rs: 2490-160-7290) respectively @ 33% of the total posts of District cadre-strength with effect from the date as noted against each:-

Sr.No:	Name/Designation.	School.	Date of award of Selection Grade.	Remarks:
1.	Rafia Naz, PTC	GGPS-02 Dhobian.	01-11-1996.	Nil
2.	Shagufta Naz, PTC	GGPS01 Anbar.	01-11-1996.	"
✓3.	Bushra Begum, PTC	GGPS, Kalabat.	01-11-1996. ✓	"
✓4.	Shamim Akhter PTC	GGPS. Kotha.	01-12-1996. ✓	"
✓5.	Tohira Jaboon PTC	GGPS, Thandkoi.	01-09-1997. ✓	"
✓6.	Naila Khatoon PTC	GGPS-02 Marghuz.	01-09-1997. ✓	"
✓7.	Nargis Akhter PTC	GGPS-02 Adina.	01-09-1997. ✓	"
✓8.	Mumlikat Begum PTC	GGPS, Sandwa (Gadoon)	01-11-1997. ✓	"
X9.	Razia Sultana PTC	GGPS, Matani Changan.	01-11-1997. X	"
✓10.	Mumlikat Begum PTC	GGPS, Bauraga (Dagai)	01-05-1998. ✓	"
✓11.	Nihayat Lajber PTC	GGPS, Shamroz Abad.	01-05-1998. ✓	"
✓12.	Nazneen Akhter PTC	GGPS, No-01 Panj Pir.	01-05-1998. ✓	"
13.	Amina. PTC	CMS, Haji Abad (G. Kot)	01-05-1998. ✓	"
✓14.	Zanida Begum. PTC	GGPS, Nazim Abad.	29-05-1998. ✓	"
✓15.	Salma Siraj PTC	GGPS, Fermoli.	29-05-1998. ✓	"
✓16.	Suriyya Jan. PTC	GGPS, No-01 Marghuz.	29-05-1998. ✓	"
✓17.	Fizwan Sultana PTC	GGPS, Maneri-Bala.	01-11-1998. ✓	"
18.	Rashida Qaisar PTC	GGPS, Zikarya.	01-11-1998. X	"
✓19.	Nasreen. PTC	GGPS, Khalil.	01-11-1998. ✓	"
✓20.	Nasreen Akhter PTC	GGPS, No-01 Topi.	01-11-1998. ✓	"
✓21.	Samina Begum. PTC	GGPS, No-01 Kotha.	01-11-1998. ✓	"
✓22.	Noorul Hawa. PTC	GGPS, Kalabat.	01-11-1998. ✓	"
✓23.	Laiq Sultana. PTC	GGPS, Rani Zai.	01-11-1998. ✓	"
✓24.	Fozia Musarrat PTC	CMS, Panj Pir.	01-11-1998. ✓	"
✓25.	Salia Bano. PTC	GGPS, No-01 Zaia.	01-11-1998. ✓	"
✓26.	Istiraj Begum PTC	GGPS, No-01 Gandaf-Payan	01-11-1998. ✓	"
✓27.	Nighat Soomra. PTC	GGPS, No-01 Swabi.	01-11-1998. ✓	"
✓28.	Muslihat. PTC	GGPS, Jera (Gohati)	01-11-1998. ✓	"
✓29.	Nighat Shaheen PTC	GGPS, Shahmansoor.	01-12-1998. ✓	"
✓30.	Masara Begum PTC	GGPS, Bam Knail.	01-12-1998. ✓	"
✓31.	Masara Begum PTC	GGPS, No-02 Maneri.	01-12-1998. ✓	"
✓32.	Masara Begum PTC	GGPS, Barwan Shah Kot.	01-12-1998. ✓	"
✓33.	Masara Begum PTC	GGPS, No-01 Adina.	01-12-1998. ✓	"
✓34.	Masara Begum PTC	GGPS, No-02 Showla.	01-09-1999. ✓	"
✓35.	Nusrat Begum PTC	GGPS, No-02 Bachai.	01-09-1999. ✓	"

Continued on page No.

(Handwritten Signature)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELEMENT: & SEC: EDUCATION, SWABI).GRANT OF LEAVE.

Sanction to the grant of leave is hereby accorded to the following PST (Female) mistresses of various schools noted against each name under the N.W.F.P. revised leave rules, 1981.

Sr. Name.	School.	Period of Leave.	Remarks.
✓ 1. Nighat Shaheen	GGPS, No:1 Shahmansoor.	(a) 15.12.2009 to 03.11.2010.....	322 days earned leave on the strength of half average pay.
		(b) 04.11.2010 to 15.12.2011.....	408 days EOL without pay.
2. Robina.	GGPS, No:3 Kotha.	28.08.2009 to 25.11.2009.....	90 days maternity leave on full pay.
3. Shahzadi.	GGPS, Besak.	29.08.2009 to 12.10.2009.....	45 days maternity leave on full pay.
4. Aneela Zahid	GGPS, Kalabat.	02.09.2009 to 16.10.2009.....	45 days maternity leave on full pay.
✓ 5. Shah Naz.	GGPS, Shamroz- Abad (Dagai)	15.12.2009 to 28.05.2010.....	165 days EOL without pay.

NOTE:- Necessary entries should be made in their service books.

(MUHAMMAD ZADA).
EXECUTIVE DISTRICT OFFICER
(ELEMENT: & SECOND: EDU: SWABI).

Endst. No: 139-9 !Leave/PST (Female)/Dated: 6/1/2010

Copy for information & for n/action to the:-

- 1-2. Deputy District Officer's (Female) E&SE, Swabi.... Topi
alongwith original service books.

✓ *Muhammad Zada*
06/1/10
DISTRICT OFFICER (FEMALE)
(ELEMENT: & SECOND: EDU: SWABI).

The D.E.O. (F) Swabi

33

Annexure I

Charge of PST after availing long leave

Respected Madam:

The applicant was proceeded on long leave w.e.f. 15-12-2008 to 14-12-2011 and prior to its expiry approached the S.D.O. (F) for joining duty at G.G.P.S. Shahmansur, rather from 15-12-2011 regularly attending the school but she is not yet given charge of the office/Teacher and only ordered to write.

It is therefore requested that headmaster G.G.P.S. Shahmansur be asked to give me charge of the post as PST in the school.

8/14/2/2012:

/s/ Nighat Shahreen
NIGHAT SHAHREEN

M. H. A. H.

D

تاریخچه و سوابق خدمتی آقای ...

DDO
Caucasus
Detail history

اینجانب در تاریخ ...
در مقام ...
در مقام ...
در مقام ...
در مقام ...

اینجانب در تاریخ ...
در مقام ...
در مقام ...
در مقام ...
در مقام ...

Neghat Sharihan
PST
ON leave

Asst. Secy
R

35

دفتر سب ڈویژنل ایجوکیشن آفیسر (زمانہ) حوالی

نام: سماہ نیگت متاھین ایڈ دھتر محبوب خان
محلہ طاوس خانی گاؤں ڈالخانہ زیرہ تحصیل قلعہ حوالی
عنوان: نوٹس غیر حاضری

یادداشت: حوالہ موصولہ چھٹی از دفتر (DEPT) حوالی نمبر 2589 مورخ 20.12.14

آپ مورخ 15-12-2009 تا 15-12-2011 تک طبی چھٹی پر تھی۔
طبی ختم ہوتے ہی نہ آپ نے اپنی ایڈجسٹمنٹ کیلئے درخواست دی۔ نہ ڈپٹی
رہنمائی سے۔ بلکہ مسلسل ڈپٹی سے غیر حاضر رہی۔

لہذا آپ کو بذریعہ نوٹس ہذا اطلاع دی جاتی ہے کہ چھٹی ہوا ملے ہی
ایڈجسٹمنٹ کے اندر اندر اپنی ڈپٹی پر حاضر ہو کر اپنی غیر حاضری کی وجوہات
پیش کریں۔ بصورت دیگر آپ کی طرف سے کارروائی عمل میں لائی جائے گی
جس میں آپ کو ملازمت سے برخواستگی کی جائے گی۔

سب ڈویژنل ایجوکیشن آفیسر
Sub Divisional Education Officer
(زمانہ)

دلیل نمبر

نقل نمائے اطلاع ہذا سب ڈویژنل ایجوکیشن آفیسر (زمانہ) کو بھی جانی ہے۔

سب ڈویژنل ایجوکیشن آفیسر
Sub Divisional Education Officer
(زمانہ)

To,

36
The Sub Divisional Education Officer (Female),
Swabi.

Annex (4)

Subject: ADJUSTMENT.

Reference you letter No. 49/9 dated 13.1.2015 SDEO (F) Swabi.

Respected Madam,

It is requested that I proceeded on long leave and one week prior to its expiry i.e 12.12.2011, I reported to the concern quarter but neither I was given charge nor adjusted any where, rather the previous Government was interested to prolong the period of new incumbent who was appointed on leave vacancy against my post.

I tried my best and went from pillar to post but of no avail rather orally instructed to wait for adjustment.

In the year 2012 I moved applications for adjustment but they too bore no result and I was kept on waiting.

Disappointing there from my husband took me abroad to UK but I was regularly in contact with my department because I had rendered 24 year active service as PST at various schools in the District while my last posting was Government Girls Primary School Shah Mansoor, Swabi.

I time and again knocked at the door of the competent authority (copies of applications are attached) but never adjusted by the competent authority. However in the year 2012 order for adjustment was made but even then I was not adjusted and subsequently the same order was cancelled,

I was please to listen that this office has asked me to join my services vide letter No 49-9 dated 13.01.2015 office of SDEO (F) Swabi, received today 23.01.2015.

You are requested to indicate me as to when, where and in what school I may resume my duties.

With thanks

Yours obediently

Nighat Shaheen

Nighat Shaheen,
PST, d/o Mehboob Khan,
Mohallah Tawas Khani,
Village Zaida, Tehsil & Distt,
Swabi.

(Handwritten signature)

Annex M

37

رجسٹر حاضری مدرسین گورنمنٹ گریڈ پرائمری اسکول سیکنڈ سٹی ریزروہ
 بابت ماہ فروری 2015ء

رجسٹر حاضری مدرسین گورنمنٹ گریڈ پرائمری اسکول ٹیچرز کیمپ
 بابت ماہ فروری 2015ء

ردیف	روز و تاریخ		وقت		نوع		مقام	
	آد	دو	آد	دو	آد	دو	آد	دو
2	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
3	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
4	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
5								
6	WS 12:00	WS 8:30	F.N 12:00	F.N 8:30	MA 12:00	MA 8:30		
7	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
8								
9	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
10	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
11	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
12	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
13	WS 12:00	WS 8:30	F.N 12:00	F.N 8:30	MA 12:00	MA 8:30		
14	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
15								
16	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
17	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
18	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
19	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
20	WS 12:00	WS 8:30	F.N 12:00	F.N 8:30	MA 12:00	MA 8:30		
21	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
22								
23	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
24	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
25	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
26	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
27	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
28	WS 1:35	WS 8:30	F.N 1:35	F.N 8:30	MA 1:35	MA 8:30		
29								
30								
31								

ردیف	روز و تاریخ		وقت		نوع		مقام	
	آد	دو	آد	دو	آد	دو	آد	دو
2	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
3	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
4	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
5								
6	WS 12:00	WS 8:30	S.B 12:00	S.B 8:30	R.B 12:00	R.B 8:30	MA 12:00	MA 8:30
7	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
8								
9	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
10	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
11	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
12	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
13	WS 12:00	WS 8:30	S.B 12:00	S.B 8:30	R.B 12:00	R.B 8:30	MA 12:00	MA 8:30
14	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
15								
16	WS 1:35	WS 8:30	C Leave	C Leave	M.A 1:35	M.A 8:30		
17	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
18	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
19	WS 1:35	WS 8:30	C Leave	C Leave	MA 1:35	MA 8:30		
20	WS 12:00	WS 8:30	S.B 12:00	S.B 8:30	R.B 12:00	R.B 8:30	C Leave	
21	WS 1:35	WS 8:30	C Leave	C Leave	MA 1:35	MA 8:30		
22								
23	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
24	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
25	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
26	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
27	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	C Leave	
28	WS 1:35	WS 8:30	S.B 1:35	S.B 8:30	R.B 1:35	R.B 8:30	MA 1:35	MA 8:30
29								
30								
31								

Handwritten signature and notes on the right side of the page.

مقام سابقہ میران مقام سابقہ میران مقام سابقہ میران مقام سابقہ میران مقام سابقہ میران

رجسٹر حاضری مدرسین گورنمنٹ کالج لائبریری اسکول 33 زیبرہ
 بابت ماہ مارچ 2013ء

رجسٹر حاضری مدرسین گورنمنٹ کالج لائبریری اسکول 33 زیبرہ
 بابت ماہ مارچ 2013ء

No	مدرسین				مدرسین				مدرسین				مدرسین			
	نام	روز	وقت	حاضر	نام	روز	وقت	حاضر	نام	روز	وقت	حاضر	نام	روز	وقت	حاضر
1																
2	N.S. 1-35	N.S.	8:30		F.M. 1-35	F.N.	8:30		W.S. 1-35	W.S.	8:30		S.B. 1-35	S.B.	8:30	
3	N.S. 1-35	N.S.	8:30		F.M. 1-35	F.N.	8:30		W.S. 1-35	W.S.	8:30		S.B. 1-35	S.B.	8:30	
4	N.S. 1-35	N.S.	8:30		F.M. 1-35	F.N.	8:30		W.S. 1-35	W.S.	8:30		S.B. 1-35	S.B.	8:30	
5	N.S. 1-35	N.S.	8:30		C. Leave	C. Leave			S.B. 1-35	S.B.	8:30					
6	N.S. 1-35	N.S.	8:30		F.N. 1-35	F.N.	8:30		W.S. 1-35	W.S.	8:30		S.B. 1-35	S.B.	8:30	
7	N.S. 1-35	N.S.	8:30		F.N. 1-35	F.N.	8:30		C. Leave	C. Leave			S.B. 1-35	S.B.	8:30	
8																
9																
10																
11																
12																
13																
14																
15																
16																
17																
18																
19																
20																
21																
22																
23																
24																
25																
26																
27																
28																
29																
30																
31																

38

Handwritten signature

39) Leave Sanctioned vide EpO Endstt No, 136-9/96-1
Amn - Al

From: 12/03/2009 To 03/12/2010 = 322 days Earned Leave with half average pay.

From: 4/12/2010 To 15/12/2011 = 408 days Extra leave with half pay.

مقام عالی: میری چھٹی فتم ہونے سے ایک ماہ پہلے میں نے گورنمنٹ گزٹ میں امریکی کنسل
مشاہدہ منظور (ساتھ ساتھ) کو رولڈ ٹائٹل چھٹی 15/12/2011 تا 15/12/2010

کرنے اور ڈیوٹی کیلئے رپورٹ کی۔ لیکن وہاں سے معلوم ہوا کہ میرے لیے

پوسٹ پر بعد اور ڈیوٹی ساتھ ASD, B.O. علی حیدر آف پیسج میر کی پیشگی

یہ کہ تقریباً ہر مہینے میں دفتر B.O. میر کی میں در فرسٹ دی

جو B.O. میر کو جمع دیا گئی۔ چنانچہ جمعہ بنایا گیا کہ میری Adjusted

بہت جلد کر دی جائے گی۔ لیکن جمعہ افسوس ہے کہ کیا پڑتا ہے۔ کم سے کم بار بار

کینڈے باوجود نہ میری ایک ماہ کی چھٹی کینڈے کی گئی اور نہ میری Adjusted

کی گئی۔ میں نے تین ماہ انتظار کیا میرے کمزور اہتمام حسین اور فقیر نے

ریاقتاً دیکھنے میں گئی بار میرے Adjusted کینڈے گزرتے ہیں لیکن

دفتر کی طرف سے لکھنؤم رجسٹر کی بنا پر خاموشی تھی۔ پھر بھی میں خاموشی

نہ رہی لیکن دفتر کی طرف سے خاموشی تھی۔ تقریباً 3 ماہ بعد دفتر

دی B.O. میر کے چھٹی نمبر 9-9/9-13/15/15 مجھے حکم دیا گیا کہ

میں ڈیوٹی کیلئے حاضر ہوں۔ میں فوراً حاضر ہوئی چنانچہ دفتر میں مجھے

میرے وہاں کے سامنے بنایا گیا کہ میں فلاح کو رولڈ ٹائٹل گزرتے امریکی کنسل 3

تو وہاں میں ڈیوٹی کیلئے جاؤں چنانچہ میرے Adjusted آدرا

صحیح دیا جائیگا۔ میں نے مورخہ 2015-2-20 تا 2015-3-07

مذکورہ سکول میں ڈیوٹی کی۔ جو رجسٹرڈ ٹیچر ہوں اس لیے یہ نوٹوز

میں ڈیوٹی کے دوران میں فاطمہ بنتول بیگم سے اس کے گورنمنٹ ٹیچر

کی سکول پر ایم فلین سکول میں تھیں تو انکو اس کی کلاس سے آئی

اس نے مجھے ایک Questionnaire دیا جس کا جواب میں نے

اسے تحریری طور پر دیا ہے۔

تاریخ 2015-3-27

ڈاکٹر عزیز محمد انور کی طرف سے

گورنمنٹ جنرل ڈی ایچ او (زناتہ) صوابی

محکمہ اہل

عنوان :- خارج الودع و ادو اہلی شہزادہ

جناب عالیہ

مورد نامہ گذارش ہے کہ ذریعے آب جناب عالیہ کے نام پر

گورنمنٹ گزٹڈ پبلک سٹروک و زمین میں ڈیوٹی

لغویہ PST شروع کی ہے۔ لیکن اب تک نہ

خارج منبائے قائم ہوا ہے اور نہ ادو اہلی شہزادہ کا

قدوم یا نامہ کی سے اپنی ڈیوٹی سرانجام دے رہی ہے

اور خارج 2015 کا سینہ لہی ادعا گذرے والا ہے

لیکن نہ کوئی یا نامہ قلمناہ موصول ہوا اور

نہ عوضات یا بارے کوئی حکم صادر ہوا

استعداد ہے نہ منظور اہل نفاذ قدوم کو

ادو اہلی شہزادہ اور یا نامہ خارج منبائے قائم

صاحب فرماویں۔ تاکہ قدوم کو تیز دروازے کھلیاں

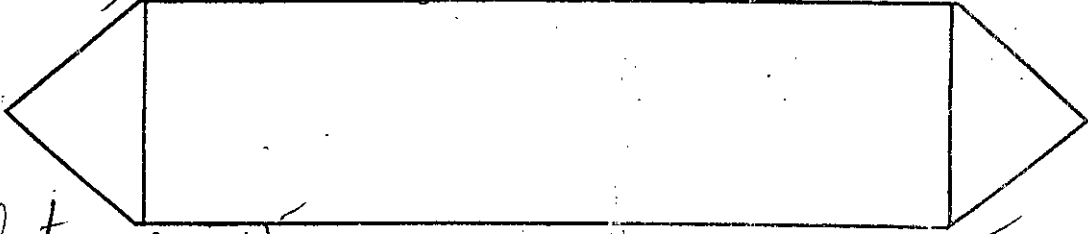
شہزادہ
فوریہ 16 مارچ 2015

یا نامہ

Reghal Sherkeen
نلسٹ شاپین PST
گورنمنٹ گزٹڈ پبلک سٹروک و زمین میں ڈیوٹی

Handwritten signature

بعدالت جانب سروس ڈیسول سٹار



Appellant کا 2012ء بمطابق
نلسن سائیس بنام حکومت واپس

موزنہ 1-6-22

مقدمہ
دعویٰ سروس ایپل
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام سٹار سروس کے لئے فرول وان ایڈیٹریل وان ایڈیٹریل

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موسوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر این پروستخط 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 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سنہ 1997ء ہے۔

انرقوم
Allied & allied
کے لئے منظور ہے۔

مقام سٹار

Neyabat Shabeen

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR

Service Appeal No. 720/2015

Mst.Nighat Shaheen PST GGPS Zaida (Swabi)..... Appellant.
Tehsil and District Swabi.

VERSUS

Secretary to the Govt. of Khyber Pakhtunkhwa Education Department,
Peshawar and others.....Respondents.

REPLY ON BEHALF OF THE RESPONDENTS NO.1to 3

Respectfully Sheweth,

PRELIMINARY OBECTIONS:

- 1) That, the appellant has no cause of action to file the instant appeal.
- 2) That, the instant appeal is badly time barred.
- 3) That, the appellant has filed the instant appeal just to pressurize the respondents.
- 4) That the appellant has not come to the Tribunal with clean hands.
- 5) That the appellant has concealed material facts from Honourable Tribunal.
- 6) That appellant has been estopped to file the appeal by her own conduct.
- 7) That upon concealment of facts, no one can claim any relief hence the instant appeal is liable to be dismissed.
- 8) That the appeal of the appellant is barred by law.

ON FACTS:

- A Incorrect, the appellant was appointed as PST not PET.
- B. Incorrect, the appellant was on leave w.e.f 15/12/2009 to 3/11/2010 with half pay and from 4/11/2010 to 15/12/2011 on EOL without pay on her own request, sanctioned vide this office NO:139-G dated 6/1/2010.After the expiry of leave sanction she did not join her duty. And she remained absent from duty w.e.f 6/12/11 to 3/2/2015.Absent notice was issued vide No:49-G dated 13/1/15 (copies of notification of absence notices are A,B) .
- C. Detailed reply has been given in the above paras.
- D. It is incorrect and need to prove it. According to the inquiry officer She has gone abroad with her husband to UK without obtaining NOC from the Department (copy Annexed "C".
- E. It is incorrect The appellant did not approach this office nor join her duty. The respondents issued notices to her home address and directed her to join her duty otherwise she will be proceeded under the E&D Rules 2011.

21/7/1

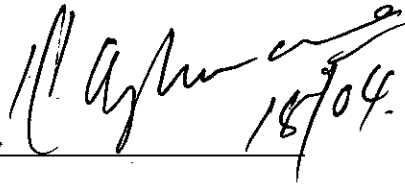
- F. It is incorrect.
- G. It is incorrect and against facts and law. Detail reply has been given in the above paras.
- H. In correct She has not given an application for resuming duty nor did join this office.
- I. As per para above.
- J. In correct as per para above.
- K. Incorrect no written order was given to her. And She remained absent from duty w.e.f 12/12/11 till now without any information/application.
- L. As per para mentioned above.
- M. As per para above.
- N. According to the inquiry officer report she remained absent from her duty w.e.f.16/12/11 to 3/2/2015(3 years 1.5. Months) without any information/sanction.
- O. According to the appellant reply she has went abroad to UK with her husband without any NOC from the department. Which is against the rules and law.
- P. She has not waited for her adjustment and again she gone abroad on 26/2/2015 without any prior permission/sanction from this office.
- Q. In correct no appeal has been received. And for the pensionary benefit the qualifying service is 25 years. Which is not completed by the appellant.
- R. Another inquiry officer Mr. Sikandar Sher Principal GHSS Mansabdar was appointed but due to not produce the S/Book by the applicant to the inquiry officer, the said inquiry remains incomplete till now.
- S. The length of service may be proved through S./Book.
- T. That the appellant is still absent from duty. The disciplinary process against her is under process, the respondent NO:3 has issued Final absence notice vide this office NO: _1430 dated_5/4/2016 on her home address under Register cover. She will be dealt with in accordance with law.

GROUND OF APPEAL

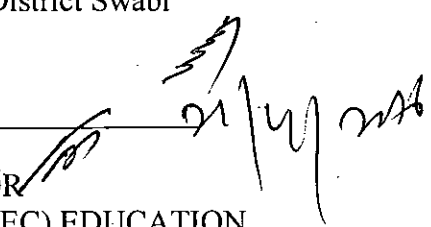
1. In correct she has been dealt with in accordance with law and policy.
2. In correct. The petitioner is treated as per law and rules.
3. In correct. The impugned order was issued under the rules and policy.
4. In correct. The qualifying service for the retirement is 25 years. How ever appellant admitted her absence in this para.

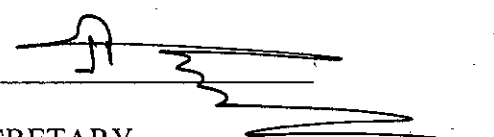
- 49
5. In correct. She remained absent from duty w.e.f 16-12-2011 to 03-2-2015 (03- years 1.5 months). Respondents act as per law and rules.
 6. In correct already replied above.
 7. The other points of law and facts shall be raised / argued if required for the assistance of the tribunal during final hearing.

In wake of the above submissions. It is requested that this Honourable Tribunal may very graciously be pleased to dismiss the instant appeal.


18/04

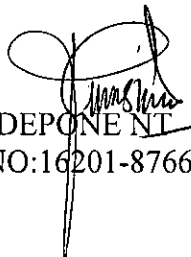
District Education Officer
(Female) District Swabi


DIRECTOR
(ELE. & SEC) EDUCATION
GOVT. K.P.K PESHAWAR


SECRETARY
(ELE. & SEC) EDUCATION
GOVT. K.P.K PESHAWAR

AFFIDAVIT

I Jamshaid Khan (Litigation officer) office of the District Education officer (F) Swabi do hereby solemnly affirm and declare that the contents of the accompanying Para-wise comments submitted by respondents are true and correct to he best of my knowledge and belief that nothing has been concealed from this Honourable Tribunal.


DEPONENT
CNIC NO:16201-8766444-7P 18/04/2016

D42 POF
E&S, Swabi

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELEMENT: & SEC: EDUCATION, SWABI.)

GRANT OF LEAVE

Sanction to the grant of leave is hereby accorded to the following PST(Female)mistresses of various schools noted against each name under the N.W.F.P.revised leave rules, 1981.

Sr. Name.	School.	Period of Leave	Remarks.
✓ 1. Nighat Smaheen	GGPS, No:1 Shahmansoor.	(a) 15.12.2009 to 03.11.2010.....	322 days earned leave on the strength of half average pay.
		(b) 04.11.2010 to 15.12.2011.....	408 days EOL without pay.
2. Robina.	GGPS, No:3 Kotha.	28.08.2009 to 25.11.2009.....	90 days maternity leave on full pay.
3. Shahzadi.	GGPS, Besak.	29.08.2009 to 12.10.2009.....	45 days maternity leave on full pay.
4. Ineela-Zahid	GGPS, Kalabat.	02.09.2009 to 18.10.2009.....	45 days maternity leave on full pay.
✓ 5. Shah Naz.	GGPS, Shamroz-Abad(Dagai)	15.12.2009 to 28.05.2010.....	165 days EOL without pay.

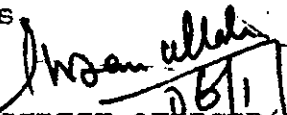
NOTE:- Necessary entries should be made in their service books.

(MUHAMMAD ZADA) ²²
EXECUTIVE DISTRICT OFFICER
(ELEMENT: & SECOND: EDU: SWABI).

Endst.No: 139-9 ILeave/PST(Female)/Dated: 6/1/2010

Copy for information & for n/action to the:-

- 1-2. Deputy District Officer's (Female) E&S, Swabi.... Toni alongwith original service books


 ✓ DISTRICT OFFICER (FEMALE)
 (ELEMENT: & SECOND: EDU: SWABI).
 06/11

1/11/2010, Swabi...
Date P.D. No. 139-9/2010

نمبر 9-9

تاریخ 13/1/15

رجسٹری عدالت

ادارہ دکن سٹریٹ ڈائریکٹریل ایجوکیشن آفیسر (رٹنامہ) حوالہ

مقام: سماجی ادارت متناہین ایجوکیشن کمیٹی حوالہ
محلہ نظام میں خانی کافور ڈاکٹر ایجوکیشن آفیسر حوالہ
تولڈس غیر حاکمہ

باداشت: کوالیفیکیشن کمیٹی کے ذریعہ (DEAF) حوالہ نمبر 2529 حوالہ نمبر 14-12-2011

آپ کو 15-12-2009 تا 15-12-2011 تک طلبہ کی فہرست
میں ختم ہوتے ہی آپ نے اپنی ذمہ داریاں سرانجام دی ہیں۔
میں اس کے متعلق ڈیڑھ سے غیر حاکمہ رہی

لہذا آپ کو برادری کے ذریعہ اطلاع دی جاتی ہے کہ کمیٹی کے ذریعے
آپ کے بارے میں ایجوکیشن آفیسر کو مطلع کیا گیا ہے۔
میں اس کے متعلق ڈیڑھ سے غیر حاکمہ رہی اور اس کے
ختم میں آپ کو اطلاع سے برادری کے ذریعے

ذمہ دار
ذمہ دار ایجوکیشن آفیسر
Sub Divisional Education Officer
(13/1/15)

ذمہ دار

ذمہ دار ایجوکیشن آفیسر کے ذریعے اطلاع دی جاتی ہے

ذمہ دار ایجوکیشن آفیسر
Sub Divisional Education Officer
(13/1/15)

5
712115

9
10

OFFICE OF THE HEAD MISTRESS
GOVT. GIRLS HIGH SCHOOL
BAM KHEL (SWABI)

NO 16 DATED 05-3-15

TO,
THE DISTRICT EDUCATION OFFICER (F)
SWABI

SUBJECT: ENQUIRY AGAINST MISS NIGHT SHAHEEN PST -12 GGPS SHAH
MANSOOR NO 3, NOW WORKING AT GGPS ZAIDA NO2.

R/MADAM,

INTRODUCTION;

In response to your office order no 509 dated 28-2-15 received on 3-4-15, I under signed conducted enquiry against the above name PST on 4-3-15 at 10.30.

2. HISTORY;

The history about the official was that she has taken leave for two times for the period (a) 15.12.2009 to 03.11.2010 (b) 04.11.2010 to 15.12.2011. Her leave was expired on 15.12.2011. But she did not report to the department at the end of the leave i.e 16.12.2011. The charges against her is that she was absent without any application or any official procedure involved to take leave from higher authorities. That absent period was from 16.12.2011 to 3.2.2015 (nearly 3 years and 1.5 month).

3. ENQUIRY PROCEDURE;

A questionnaire was served to MISS NIGHT SHAHEEN, which is attached here along with her replies for your perusal please. And other documents which are provided by the teacher are also attached.

4. FINDINGS;

According to the official, she has taken leave with proper official procedure. When she came back after leave, she reported to the department and submitted application several times to adjust her on PST post. According to her the response of the department was not positive. After this she went to England along with her family. She claimed that during this period she was in regular contact with the department. When she get remainder from the department NO 49-9 Dated 13.1.2015, she immediately reported to the department on 3.2.2015. Now she is performing her duty at GGPS Zaida no2 without any order from the head of the department. She claimed that one of the SDEO(F) swabi personnel told her to join the school and we will send the order. She also claimed that she has not received any pay for the leave period as well as absent period.

5. ANALYSIS;

Only Education can save us from the destruction. A teacher is a back bone of a teaching learning process. If there is a school and children but no teacher, the child can not get education from the four walls of the school.

In my opinion the teacher should not take leave for more than 3 or 4 months, and maximum up to one year. If the teacher needs 3 or 4 years leave then it is better that she should leave the department.

6. RECOMMENDATION:

In the light of her 24 years service at the education department I give the following recommendation;

- a. she should be granted the right of LPR as per GOVT; rule.
- b. Right of pension and Gratuity as per GOVT; rule.
- c. If the department disagree with the recommendation, then legal education Advisor should be consulted.

J. Batool
5-3-15
Head Mistress
Govt: Girls High
School Bam Khel

DATA

9

رجسٹری فرم

13/1/15

مورخہ

13/1/15

از :- دفتر سب ڈویژنل ایجوکیشن آفیسر (زمانہ) صوابی

بنام :- سماءہ بیگم ستا عین بیگم دختر محبوب خان
محلہ طاووس خانی گاؤں ٹھکانہ زیرہ تحصیل قلعہ صوابی
عنوان :- نوٹس غیر حاضری -

یادداشت :- بحوالہ موصولہ چھٹی از دفتر (DEAF) صوابی نمبر 2589 مورخہ 14-12-2011

آپ مورخہ 15-12-2009 تا 15-12-2011 تک مجلس چھٹی پر تھی۔
چھٹی ختم ہوتے ہی نہ آپ نے اپنی ایڈجسٹمنٹ کیلئے درخواست دی۔ نہ ڈیوٹی
پر حاضر ہوئی۔ بلکہ مسلسل ڈیوٹی سے غیر حاضر رہی۔

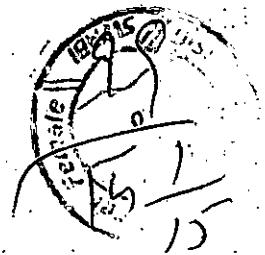
لہذا آپ کو بذریعہ نوٹس فدا اطلاع دی جاتی ہے کہ چھٹی ختم ہوتے ہی
آپ بیعت کے اندر اندر اپنی ڈیوٹی پر حاضر ہو کر اپنی غیر حاضری کی وجہ سے
پیش کریں۔ بصورت دیگر آپ کی خلاف بیطرفہ کارروائی عمل میں لائی جائے گی
جس میں آپ کو ملازمت سے برخواستگی کی جائے گی۔

سب ڈویژنل ایجوکیشن آفیسر
زمانہ صوابی

ذیل نمبر 49-8

نقل برائے اطلاع ضابطہ ڈسٹرکٹ ایجوکیشن آفیسر (زمانہ) کو بھیجی جاتی ہے۔

سب ڈویژنل ایجوکیشن آفیسر
Sub Divisional Education Officer
زمانہ صوابی





Recd.

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

(Office phone Fax No 0938280339, emisfswabi@yahoo.com)

Swabi No 1430 Dated 05/4/2016

To


Mst: Nighat Shaheen D/O Mahboob Khan
Rtd: Principal Mohallah Touse Khani Village &
Post Office Zaida.

SUBJECT: - **FINAL ABSENT NOTICE.**

Memo: -

On the compliance of SDEO (F) Swabi absent report vide No.49-9 dated 13-01-2015, you reported for duty and your case for your adjustment and absent period from duty w.e.f 16-12-2011 to 02-02-2015 were under process in this office as well as at S.D.E.O (F) Swabi but you ~~are~~ once again remained absent w.e.f 26-2-2015 and ^{have} gone abroad without information to this office.

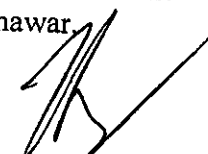
Therefore, you are finally directed, to attend this office along with your original CNIC & Service Book for adjustment /duty with in up to 16-4-2016 otherwise strict disciplinary action will be initiated against you under E & D rules 2011.


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst: No. 1431-9

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

1. Director Elem: & Secy: Education Khyber Pakhtunkhwa Peshawar.
2. Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar.
3. S.D.E.O (Female) Swabi.


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI