

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

SERVICE APPEAL NO. 105/2023

Imrana Ghafoor
Ex-Associate Professor (BPS-19)

..... (Appellant)


VERSUS

The Chief Secretary, Khyber Pakhtunkhwa, Peshawar and others. Others

..... (Respondents)

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Section Officer (Litigation)

Higher Education Department, Khyber
Pakhtunkhwa Peshawar
& Libraries Department
Khyber Pakhtunkhwa

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL NO. 105/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 5810

Dated 5-06-23

Imrana Ghafoor
Ex-Associate Professor (BPS-19)

..... Appellant.

VERSUS

The Chief Secretary, Khyber Pakhtunkhwa, Peshawar and Others.

..... Respondents.

JOINT PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 AND 2.

Respectfully Sheweth: -

Preliminary Objections: -

- I. That the Appellant has got no cause of action to file the instant case.
- II. That the Appellant is estopped by her own conduct to file the instant appeal.
- III. That filing of this appeal is futile exercise and wastage of precious time of this Honorable Service Tribunal, hence liable to be dismissed.
- IV. That the instant appeal is not maintainable.
- V. That the appeal in hand is barred by limitation/ law as such, this honorable tribunal (with due respect) lacks jurisdiction to entertain a time barred appeal.
- VI. The instant appeal is bad for non-joinder of necessary parties, like Director Higher Education Department, KP and heads of law enforcement agencies as alleged.

On Facts: -

1. Pertains to record, hence no comments.
2. Para-2 does not relate to the answering respondents, hence no comments.
3. Para-3 does not relate to the answering respondents, hence no comments.
4. Para-4 does not relate to the answering respondents, hence no comments.
5. Para-5 does not relate to the answering respondents, hence no comments.
6. Para-6 does not relate to the answering respondents, hence no comments.

7. Incorrect, hence denied, that on 15.11.2011 a letter of willful absence in respect of appellant was received from FATA Secretariat as the services of the appellant were placed at the disposal of Directorate of Education FATA vide order dated 12.09.2011. However, the appellant did not arrive for her duties and remained absent for almost four (04) months as per letter *ibid*, which was forwarded to the Directorate of Higher Education Khyber Pakhtunkhwa, for looking into the matter vide later dated 07.12.2011. **(Annexed as A, B & C).**
8. Incorrect, hence denied, upon confirmation from the Directorate of Higher Education Department regarding willful absence from duty of the appellant, Prof. Muhammad Suleman Khattak, Principal Government Degree College Takhtbhai was nominated as an enquiry officer by the competent authority to conduct an inquiry **(Annex-D)**. Moreover, charge sheet and statement of allegations were also sent to the inquiry officer to be served upon the appellant. Thereafter, the inquiry officer along with Mr. Aziz Muhammad (Stenographer) of the Directorate of Higher Education Department personally visited house of the appellant situated at House # 115, Street No. 08, Sector H-3, Phase-2, Hayatabad but found no clue of whereabouts of the appellant. It is worth mentioning here that the absence notices were also published in two reputed newspapers i.e. (Daily Mashriq & Daily Aaj) on 02.08.2012 **(Annex-E)**. The inquiry officer submitted the report with the recommendations that the appellant being found guilty of misconduct on account of her inefficiency and willful absence from duty w.e.f 12.07.2011 till date and the appellant also failed to join the inquiry proceedings and recommended the imposition of major penalty of Removal from Service under the E&D rules, 2011, consequently, in light of recommendations of the inquiry officer and thereafter adopting the due process of law, major penalty of Removal from Service was imposed on the appellant vide notification dated 06.02.2015 **(Annex-F)**. **(Copy of enquiry Report Annex-G).**
9. Incorrect, hence denied, as the notice of willful absence of the appellant was published in two renowned newspapers i.e. (Daily Mashriq & daily Aaj) and it is also evident from the record that a registered show cause notice was also issued to the appellant on three (03) different postal addresses in which two were returned undelivered to this office by the postal services with the remarks that the appellant is not available on the said addresses. **(Annex-H)**
10. Correct, to the extent that the appellant applied for two (2) years leave, however she was required to be vigilant and to enquire about the fate of her application whether the same was approved by the competent authority or otherwise, but she did not take pains to do so. The appellant remained absent from her duties despite notices served upon her for resumption of her duties and to explain her absence from duty. Resultantly the appellant was proceeded in accordance with prevailing rules/Law.
11. As explained in the preceding para-10.
12. Incorrect hence denied, as explained in the preceding paras.


- 13. Correct to the extent that the appellant moved an application for early retirement however, by that time the appellant was already removed from service after adopting the due process of law.
- 14. Para-14 does not pertain to the answering respondents, and also needs to be proved.
- 15. Incorrect, hence denied, no record of the departmental appeal of the appellant is available. Moreover, as per rules the appellant was required to submit an appeal before the competent authority within 30 days of the order impugned herein, which the appellant failed to do so. Therefore, the departmental appeal is badly time barred and when the departmental appeal is time barred the instant service appeal is not competent and is liable to be dismissed.
- 16. Incorrect. As explained in the preceding para-15.


On Grounds: -

- 1. Incorrect, hence denied, as order dated 06.02.2015 has been issued after fulfillment of all legal and codal formalities.
- 2. Incorrect. Hence denied as explained in the preceding paras "on facts".
- 3. Incorrect. Hence denied as explained in the preceding paras "on facts"
- 4. Incorrect. Hence denied as explained in the preceding paras "on facts"
- 5. Incorrect. Hence denied as explained in the preceding paras "on facts"
- 6. Incorrect, hence denied, as order dated 06.02.2015 has been issued after fulfillment of all legal and codal formalities.
- 7. Incorrect. Hence denied as explained in the preceding paras "on facts"
- 8. Incorrect. Hence denied as explained in the preceding paras "on facts"
- 9. Incorrect. Hence denied as explained in the preceding paras "on facts"

Prayer: -

In view of the above submissions, it is humbly prayed that the Service Appeal in hand may graciously be dismissed with costs.

Respondent No. 1. 
Government of Khyber Pakhtunkhwa,
Through its Chief Secretary, Civil Secretariat,
Peshawar.

Respondent No. 2. 
Secretary Higher Education,
Government of Khyber Pakhtunkhwa
Peshawar.

SERVICE APPEAL NO. 105/2023

Imrana Ghafoor
Ex-Associate Professor (BPS-19)

..... Appellant.

VERSUS

The Chief Secretary, Khyber Pakhtunkhwa, Peshawar and Others.

..... Respondents.

AFFIDAVIT

I, Qazi Muhammad Ayaz, Section Officer (litigation) BPS-17, of Higher Education Department, Civil Secretariat Peshawar, do hereby solemnly declare and affirm on oath, that the contents of Parawise comments on Behalf of Respondents is correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'able Court.

it is further stated
on oath that
in this appeal
the answering
respondents have neither
been placed as party nor
their defense has been
struck off.



[Signature]
Deponent

CNIC No.17301-7027499-5

Mob: 091-9211027

[Signature]

(5)

Annexure A



FATA SECRETARIAT
(COORDINATION & ADMINISTRATION DEPARTMENT)
WARSAK ROAD PESHAWAR

ORDER :-

The following posting/transfer of officers of Education Department (FATA) is hereby ordered with immediate effect, in the interest of public service:-

S.No	Name & Designation	From	To	Remark
	Mst. Imrana Ghafoor, Principal (BS-19)	Principal GGDC Darra Adam Khel FR Kohat	Placed at the disposal of D.E(FATA)	
	Mst. Rana Naheed, Asstt: Professor (BS-18)	Asstt: Professor GGDC Darra Adam Khel FR Kohat	I/C Principal/ DDO GGDC Darra Adam Khel FR Kohat	Vice S.P

SECRETARY (ADMN & COORD)

Attested
[Signature]

No. PS/E-III/1-1/ 14158-64
Dated 12/9/2011

Copy to:-

- Director Education (FATA).
- Additional Accounts Officer (KPK) sub office Peshawar.
- Agency Education Officer Darra Adam Khel FR Kohat
- Agency Accounts Officer Darra adam Khel FR Kohat.
- PS to Secretary (Admn & Coord) Department, FATA Secretariat.
- Officers concerned.
- Office copy.

ADD E

P. Arif

12/9/11

*Dis missed.
Ask DDO to
stop her
salary.*

[Signature]

(Aasma Arif)
Section Officer (Estab-I)

11/9/11
[Signature]



Establishment Section

FATA SECRETARIAT
(COORDINATION & ADMINISTRATION DEPARTMENT)
WARSAK ROAD PESHAWAR

No.FS/E-II/1-22/Imrana Ghafoor/ 169373
Dated 15/11/2011

To

The Secretary
Higher Education, Archives & Libraries Department
Khyber Pakhtunkhwa.

Subject: Willful Absence from Duty

Dear Madam,

I am directed to refer to the subject cited above and to state that Ms.Imrana Ghafoor, principal Govt. Girls Degree Graduate College, Darrá Adam Khel FR Kohat has been willfully absent from duty since 12.7.2011 as per the report of staff of the college. Due to her willful absence, her services were placed at the disposal of Directorate of Education FATA (Annex-A). But she has not reported for duty yet. Her father in his letter has reported that she cannot attend her duty due to the case of her husband Dr. Shakeel Afridi (Annex-B). Her willful absence from duty for almost 4 months is misconduct and is required to be proceeded against in terms of Finance Department letter No. SO(SR-IV)5-1/80/Vol:VII/FD dated 12th of Aug.1999. Being an employee of Provincial cadre the case is hereby forwarded to you for further necessary action please.

Attested
[Signature]

[Signature]
Section Officer (Estab-II)

Copy forwarded for information to:

- PS to Secretary Administration & Coordination Department.

Yon m/a

YK
18/11

6547
19/11/11

DS(c)

SO (Estab-II)

[Signature]
21/11

147
21/11

(Aasma Arif)

Section Officer (Estab-II)

7

No. _____ dated 11/8/ 2011.

From

The Principal,
Govt: Girls Degree College,
Bara Adam Khel (F.R.Kohat).

To,

The Director of Education,
P.A.T.A (K.P.K) Peshawar.

Subject:-

NON-AVAILABILITY OF PRINCIPAL.

Memo:

It is submitted that Mrs, Iarana Shafeer principal of this college run the college Affairs up till now, but from the last 12th July 2011, the Clerical and teaching staff have contacted her on her Landline and cell phone, but they are going off. We even went to her house so many time, but she was not available in her house. She has vacated the house and has not left for us any contact number or address. No body knows her whereabouts.

The college Affairs could not be run without the principal. Now there is need for her signature on pay bills/other official papers. Also the College P/Fund Cheque Book and Stamp is within her custody.

It is therefore requested that this office may kindly be guided in this matter.

Rafiq
For
Principal,
Govt: Girls Degree
College Bara A
(F.R.Kohat).

DA

S
13/8/11

Attested
Qm A

8

Annexure C/1



Telephone # 091-9213716
Ext: 110
Fax # 091-9210368

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT



No.SO(C-III)HE/2-135/05/Imrana Ghafoor/Zool.
Dated: Peshawar the 07-12-2011

To

The Director,
Higher Education,
Khyber Pakhtunkhwa Peshawar.

Subject: **WILLFUL ABSENCE FROM DUTY.**

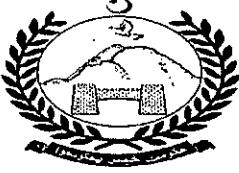
I am directed to refer to the subject noted above and to enclose herewith a copy of letter No. FS/E-II/1-22/Imrana Ghafoor/1693738, dated: 15-11-2011 received from FATA Secretariat stating therein that Ms. Imrana Ghafoor, Principal GGDC Darra Adam Khel F.R Kohat has been willfully absent from duty since 12-07-2011 as per report of staff of the College. Due to her willful absence her services were placed at the disposal of Directorate of Education FATA but she has not yet reported for duty due to chronic situation in the Agency as reported her husband Dr. Shakeel Afridi (copy enclosed). Please offer your comments.

Encl: As Above:

Jehan Zeb Khan,
SO(C-III)
Higher Education Deptt:

Attested
Opn An

01
9/12



9 Annexure D

GOVERNMENT OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARIES
DEPARTMENT

No.SO(C-I)HE/2-135/05/Imrana Ghafoor
Dated Peshawar the 21/12/2012

To

Prof. Muhammad Suleman Khattak,
Principal Govt; Degree College,
Takht Bhai (Mardan).

Subject: - **DISCIPLINARY PROCEEDINGS AGAINST MS. IMRANA GHAFOOR,
PRINCIPAL (BS-19) GOVT; GIRLS COLLEGE DARA ADAM KHEL
(FR KOHAT) ON THE BASIS OF HER WILLFUL ABSENCE.**

I am directed to refer to the subject cited above and to state that the Competent Authority (Chief Minister) has been pleased to appoint you as Enquiry Officer in the subject case. The Charge Sheet / Statement of Allegations are sent herewith to be served upon the accused officer.

It is, therefore, requested to kindly conduct enquiry, serve the Charge Sheet upon the accused officer and furnish report thereof to this Department within 25-days of the receipt of this letter, please.

Encls: As above.

↓
21/12/12
(PIR MUHAMMAD KHAN)
SECTION OFFICER (COLLEGES-I)

Endst: No. & Date as above:
Copy to the :-

1. Director, Higher Education Khyber Pakhtunkhwa Peshawar, with the request to do the needful.
2. Section Officer (Estab-II) FATA Secretariat Coordination & Administration Department Warsak Road Peshawar, w/r to his letter No.FS/E-II/1-22/Imrana Ghafoor/16937-38 dated 15/11/2011.

↓
21/12/12
SECTION OFFICER (COLLEGES-I)

IC CENTRE
BAWAR



2012

PORT (EVENING)

Available on payment
Centre's Academic
(Computer Science)
Program (Evening) program
Dates; details are as

ivalent qualification
gate
Entrance Test for the
October 11, 2012 at

can apply.

in Forms	31/08/2012
General 30%	11/09/2012
	14/09/2012
	01/10/2012

Following documents
Application Form
& Part-II DMC's

(Signature)

apply on the basis of
IBCC.

fail or after due date

Centre, University of
make necessary

mmad

(091) 9216747
edu.pk

فانا سیکرٹریٹ
سوشل سیکٹرز ڈیپارٹمنٹ، پشاور

نوٹس غیر حاضری

آپ سہ ماہی عمرانہ غفور پریسل گورنمنٹ گریڈنگ کالج دورہ آدم خیل ایف آر
کوہاٹ سوریہ 12/07/2011 سے ڈیوٹی سے غیر حاضری ہیں۔ تمام تر
کوششوں کے باوجود آپ ڈیوٹی پر حاضری نہیں ہوئی۔
آپ کی سہ ماہی کی نائٹ سیکشن آفیسر (اسٹیبلشمنٹ - II) ایڈمن اینڈ کوارڈینیشن
ڈیپارٹمنٹ فانا سیکرٹریٹ پشاور نے بذریعہ پچھلی نمبر
فانا سیکرٹریٹ / ای - II / 14158-84 / 11 / 12 / 09 / 2011 مورخہ
کی سرورس ڈائریکٹر ایجوکیشن فانا کے حوالے کی تاکہ آپ ڈیوٹی پر حاضر
ہو جائیں۔ مگر آپ ڈیوٹی پر حاضری دینے میں ناکام رہی۔ آخر کار آپ کی
مابینہ سہ ماہی اور ڈی جی گئی مگر آپ بدستور ڈیوٹی سے غیر حاضر ہیں۔

لہذا آپ کو مطلع کیا جاتا ہے۔ کہ اشتہار خندا کی اشاعت کے بعد 15 دن کے
اندر اندر دفتر خندا میں رپورٹ کریں۔ بصورت دیگر حاکم مجاز
رولڈر (A) گورنمنٹ سہ ماہی (E&AD) رولڈر 1973 کے تحت ایک طرف
کارروائی کر کے آپ کو مورخہ 12/07/2011 سے نوکری سے برطرف
کیا جائیگا۔

PIO(P): 222/12

سیکرٹری

سوشل سیکٹرز ڈیپارٹمنٹ، فانا سیکرٹریٹ ورسک روڈ، پشاور

Admission Notice

3 Year Diploma

Government Recognized

Distance Learning / Self home based study

کرنٹنٹ اور سرکاری

کرنٹنٹ اور سرکاری

Dated 2/8/2012

Attested
Signature

Annexure (F)

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Attested
[Signature]

(Prof. Dr. Muhammad Suleman Khattak)

Principal,

Government College, Takht Bhai (Mardan) /
Enquiry Officer

[Signature]

GOVT: COLLEGE TAKHT BHAI (MARDAN)

ENQUIRY REPORT

In Respect of Mst. Imrana Ghafoor, Principal, Government Girls College, Darra Adam Khel (F.R. Kohat) Regarding her Willful Absence from Duty.

Mst. Imrana Ghafoor, Principal, Government Girls College, Darra Adam Khel, F.R. Kohat was willfully absent from duty with effect from 12/07/2011. The Director of Education FATA, Peshawar was informed on 11/08/2011 by the staff of Government Girls College, Darra Adam Khel, FR Kohat, regarding her absence. The Director of Education FATA, Peshawar informed the Secretary (Administration & Coordination) FATA Secretariat. The Secretary (Administration & Coordination) FATA Secretariat placed the services of the accused Principal at the disposal of the Director of Education FATA, Peshawar. However, the accused Principal, Mst. Imrana Ghafoor, did not comply with the orders. The Director of Education FATA, Peshawar not only stopped monthly salary of the accused Principal but also intimated the case of her willful absence to the Secretary (Administration & Coordination) FATA Secretariat for disciplinary action. The Secretary (Administration & Coordination) FATA Secretariat directed the accused Principal, Mst. Imrana Ghafoor, through a Notice in The Daily Newspaper to report for duty within 15 days positively. The accused Principal, instead of reporting for duty, submitted her leave application for a period of two years to be commenced from the date of her willful absence i.e. from 12/07/2011.

Attested
[Signature]

The Secretary (Administration & Coordination) FATA Secretariat forwarded the case to the Provincial Government for initiating disciplinary proceeding against the accused Principal, Mst. Imrana Ghafoor. The Higher Education Department, Government of Khyber Pakhtunkhwa accordingly issued Charge Sheet and Statement of Allegations to the accused Principal, Mst. Imrana Ghafoor regarding her willful absence (Annex -A).

The undersigned, Dr. Sulaiman Khattak, Principal Government Degree College, Takht Bhai, District Mardan was appointed as Enquiry Officer in the subject case vide Higher Education Department letter No. SO(C-I)HE/2-135/05/Imrana Ghafoor dated 21/12/2012 and the Director Higher Education Khyber Pakhtunkhwa, Peshawar directed Mr. Aziz Muhammad, Stenographer, Directorate of Higher Education KP, Peshawar to assist me in the entire enquiry proceedings (Annex-B).

Facts

A post of Principal (BPS-19) was lying vacant in Government Girls College, Darra Adam Khel, F.R Kohat and one member amongst the college teaching staff i.e. Miss Raana Naheed, Assistant Professor (B-18) was declared as In charge Principal / Drawing & Disbursing Officer (DDO) of the college. Mrs. Imrana Ghafoor, Principal (BPS-19) was transferred from Government Girls College, Ekka Ghund (Mohmand Agency) to Government Girls College, Darra Adam Khel, F.R. Kohat against the vacant post of Principal (BPS-19) vide Notification No. FS/E/100-80(Vol-5)/3485-93 dated 29/03/2011 (Annex-C). The accused Principal, Mst. Imrana Ghafoor, took over charge of the office of the Principal (BPS-19) on 01/04/2011 at Government Girls College, Darra Adam Khel, F.R. Kohat (Annex-D). During the month of July, 2011, the accused Principal, Mst. Imrana Ghafoor, suddenly ceased to attend the college without informing either the college staff or the Director of Education FATA, Peshawar. The college affairs were suffering badly due to the absence of the accused Principal. Therefore, staff of the Government Girls College, Darra Adam Khel, FR Kohat informed the Director of Education FATA, Peshawar regarding her willful absence through official letter dated 11/08/2011 (Annex-E). In view of the absence report, the Secretary (Administration & Coordination) FATA Secretariat declared Miss Raana Naheed, Assistant Professor (B-18), Government Girls College, Darra Adam Khel, FR Kohat as In charge Principal / DDO of the college while services of the accused Principal, Mst Imrana Ghafoor, were placed at the disposal of the Director of Education FATA, Peshawar vide Notification No. FS/E-II/1-1/14158-64 dated 12/09/2011 (Annex-F). The monthly salary of

Handwritten signature/initials

Handwritten signature

15

the accused Principal, Mst. Imrana Ghafoor, was stopped with effect from 01/09/2011 (Annexure-G). After stoppage of monthly salary of the accused Principal, her father, namely Mr. Abdul Ghafoor, informed the Director of Education FATA through letter dated 22/09/2011 that his daughter was not in a position to attend her duties (Annexure-H). The accused Principal, Mst. Imrana Ghafoor, was informed through Notice published in the Daily Mashirq, Peshawar dated 02/08/2012 to report for duty within 15 days (Annex - I). Instead, she submitted a leave application dated 14/10/2012 through postal service under registered cover, addressed to the Director of Education FATA, for a period of two years to be commenced with effect from 12/07/2011 i.e. from the date of her willful absence from duty (Annexes-J & J-1). The Director of Education FATA forwarded the leave application of the accused Principal to the Section Officer, Social Sector Department FATA Secretariat; vide letter No. 13879/F-75/Imrana Ghafoor dated 01/11/2012 (Annex-K), which was found under process till the course of enquiry proceedings.

Proceedings

The In charge Principal / Drawing & Disbursing Officer (DDO) of Government Girls College, Darra Adam Khel, FR Kohat stated in her written statement that the accused Principal, Mst. Imrana Ghafoor, remained absent from duty with effect from 12/07/2011 without intimation / information to the staff of the college. The In charge Principal / DDO herself as well as the concerned ministerial staff of the college tried to contact the accused Principal on her available residential Phone No. 091-5890050 and personal Cell No. 0333-9114244, time and again, but no response was received. As the accused Principal was also DDO of the college so certain administrative and financial matters, like salaries of lower staff, cheques of private fund etc. were lying pending for her signatures. Consequently, the Director of Education FATA, Peshawar was informed, vide letter No.182 dated 11/08/2011, regarding the willful absence of the accused Principal, Mst. Imrana Ghafoor, commencing with effect from 11/07/2011. The In charge Principal / DDO of the college stopped monthly salary of the accused


Attended
Signature

Signature

Principal with effect from 01/09/2011, on the directives of the Director of Education FATA received vide letter No. 13006 dated 19/09/2011 (Annex-I). Since then the accused Principal, Mst. Imrana Ghafoor remained absent from duty. Statement of the In charge Principal / DDO of Government Girls College, Darra Adam Khel, FR Kohat, Miss Raana Naheed, Assistant Professor (B-18), duly signed by her, is enclosed herewith (Annex-M).

The Deputy Directress (Colleges), Directorate of Education FATA, Peshawar, stated that the written report dated 11/08/2011, regarding willful absence from duty in respect of the accused Principal, Mst. Imrana Ghafoor, was received from the staff of Government Girls College, Darra Adam Khel, FR Kohat. In this connection, a self-contained Note dated 02/09/2011 was submitted to the Secretary (Administration & Coordination) FATA Secretariat wherein it was suggested that the services of the accused Principal should be suspended with effect from 12/07/2011 and enquiry should be conducted. Besides this, Mst. Raana Naheed, Assistant Professor (Bps-18) of Government Girls College, Darra Adam Khel, FR Kohat was recommended to be appointed as In charge Principal / Drawing and Disbursing Officer (DDO) of the college (Annex-N). So Mst. Raana Naheed, Assistant Professor (B-18) of Government Girls College, Darra Adam Khel, FR Kohat, was declared as In charge Principal / Drawing & Disbursing Officer (DDO) of the college while services of the accused Principal, Mst Imrana Ghafoor, were placed at the disposal of the Director of Education FATA, Peshawar vide Notification No. FS/E-II/1-1/14158-64 dated 12/09/2011. Thereafter another Note dated 10/11/2011 was submitted to the Secretary (Administration & Coordination), FATA Secretariat wherein it was stated that though the accused Principal had not reported for duty up till then yet her father Mr. Abdul Ghafoor did inform the Director of Education FATA through a letter that his daughter couldn't attend her duty because she was staying at a safe place as per advice of the Security Agencies due to the case of her husband, Dr. Shakeel Afridi. The Director of Education FATA, Peshawar further recommended that either the accused Principal should be suspended from service or her services should be placed at the disposal of

Attended
Afridi

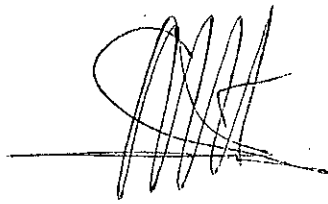


453

the Secretary Higher Education, Khyber Pakhtunkhwa, Peshawar, being an employee of the Provincial cadre (Annex-O). The Social Sector Department FATA Secretariat informed the Directorate of Education FATA, Peshawar that Absence Notice was issued to the accused Principal, Mst. Imrana Ghafoor, through the leading Daily Newspaper directing her to report for duty within 15 days positively. After publication of the absence notice in the Daily Mashriq, Peshawar on 02/08/2012, the Directorate of Education, FATA, Peshawar received leave application dated 14/10/2012 through postal mail under registered envelop, duly signed by the accused Principal, Mst. Imrana Ghafoor. The leave application dated 14/10/2012 in respect of the accused Principal was sent to the Section Officer (Education), Social Sector Department FATA Secretariat vide letter No. 13879/F-75/Imrana Ghafoor dated 01/11/2012 (Annex-P). Statement of the Deputy Directress (Colleges), Directorate of Education, FATA, Peshawar, Mrs. Sabiha Zeb, duly signed by her, is enclosed herewith (Annex-Q).

Attest
9/11/12

The Section Officer (Education), Social Sector Department, FATA Secretariat stated that the leave application dated 14/10/2012, in respect of the accused Principal, Mst. Imrana Ghafoor, was received from the Directorate of Education FATA, Peshawar which was not only on plain paper but also was not supported by the requisite admissibility report from the concerned Agency Accounts Officer, therefore, returned to the Directorate of Education, FATA, vide letter No. FS/SSDSO(E)/LC/FR Peshawar/Kohat/7990 dated 01/01/2013 (Annex-R). However, the absence report received from the Directorate of Education, FATA, was sent to the Secretary, Higher Education, Khyber Pakhtunkhwa vide letter No. FS/E-II/1-22/Imrana Ghafoor/1693738 dated 15/11/2011 for taking disciplinary action against the accused Principal (Annex-S). Statement of the Section Officer (Education), FATA Secretariat / Deputy Director of Education (FATA), Peshawar, Mr. Azad Khan, duly signed by him, is enclosed herewith (Annex-T).



On the following day the undersigned made several calls on the residential Phone No. 091-5890050 as well on the personal mobile No. 0333-9114244, that is the Mobile number of the accused Principal, Mst. Imrana Ghafoor, from the office of the Deputy Directress (Colleges) FATA. Peshawar for the purpose of recording her statement as per requirement of the enquiry proceedings but none of the above mentioned phone numbers did respond. Consequently, during office hours I myself along with my Assistant Mr Aziz Muhammad paid a visit to the residence of the accused Principal on the available address given hereunder:-

“H/No. 115, Street No. 8, Sector H-3, Phase-II, Hayatabad, Peshawar”

When we reached and knocked at the door of the house a female came out of the house. On our query she informed the enquiry committee that, in fact, the house was owned by Dr. Shakeel Afridi, husband of the accused Principal but they had hired the house for the last several years. The inmate also showed her ignorance regarding whereabouts of the owner of the house i.e. of the accused Principal, Mst: Imrana Ghafoor. A male neighbour of the nearby house confirmed that the said house was hired by the present inmates for the last several years.

Attested
[Signature]

Thereafter, the undersigned contacted father of the accused Principal, Mr. Abdul Ghafoor, on his Mobile Phone No. 0334-5209566, available on the record, if he knew something about where about of his daughter. He intimated that the accused Principal, Mrs. Imrana Ghafoor, had been living in a safe place since the arrest of her husband, Dr. Shakeel Afridi. He further informed that she could be made available after a few months for recording her statement, if the enquiry committee deemed fit. I informed him that the time he had requested was beyond the jurisdiction of the enquiry committee, However, we could wait for two weeks, if he could make the accused Principal available for doing the needful but Mr. Ghafoor showed his inability to do that.

[Signature]

Findings

The inquiry Committee went through the available record, thoroughly, in light of the allegations leveled against the accused Principal, Mst. Imrana Ghafoor, in the Charge Sheet and Statement of Allegations and found that Mrs. Imrana Ghafoor, Principal (BPS-19) was transferred from Government Girls College, Ekka Ghund (Mohmand Agency) vide Notification No. FS/E/100-80(Vol-5)/3485-93 dated 29/03/2011 to Government Girls College, Darra Adam Khel, F.R. Kohat against the vacant post of Principal (BPS-19). The accused Principal took over charge at Government Girls College, Darra Adam Khel, F.R. Kohat on 01/04/2011. The accused Principal had ceased attendance of her duty at Government Girls College, Darra Adam Khel, F.R. Kohat with effect from 12/07/2011 without intimation to the college staff or to the competent authority. The concerned staff of Government Girls College, Darra Adam Khel, FR Kohat contacted the accused Principal on her residential Phone No. 091-5890050 and Personal Mobile Phone No. 0333-9114244 but in vain, therefore, informed the Director of Education FATA, Peshawar vide letter dated 11/08/2011.

Attested
[Signature]

In view of the absence report dated 11/08/2011, the Secretary (Administration & Coordination) FATA Secretariat transferred the accused Principal, Mst Imrana Ghafoor, to the Directorate of Education FATA, Peshawar vide Notification dated 12/09/2011 but she didn't comply with the orders. Therefore, the Director of Education FATA, Peshawar stopped monthly salary of the accused Principal with effect from 01/09/2011 vide order dated 19/09/2011. Just after stoppage of the monthly salary of the accused Principal, her father, namely Mr. Abdul Ghafoor, informed the Director of Education, FATA through letter dated 22/09/2011 with the request that his daughter couldn't attend her duty because she was staying at a safe place as per advice of the security agencies due to the case of her husband, Dr. Shakeel Afridi. It was found on record that one Dr. Shakeel Afridi husband of the accused Principal, Mst. Imrana Ghafoor, was arrested and dismissed from service along with four LHVs by the Provincial Government for his involvement and assisting in OBL Operation at

[Signature]


20

Abbottabad as mentioned in the Special Branch Police, Peshawar letter No. 195-PA/SBS dated 26/03/2012 (Annex-U).

The Director of Education FATA, Peshawar had recommended the accused Principal for disciplinary action and the competent authority in FATA Secretariat issued Absence Notice to the accused Principal, Mst. Imrana Ghafoor, through The Daily Mashriq, Peshawar dated 02/08/2012 to report for duty within 15 days positively. After publication of the absence notice in The Daily Newspaper dated 02/08/2012, the accused Principal, Mst. Imrana Ghafoor, submitted leave application dated 14/10/2012, on plain paper to the Director of Education, FATA, Peshawar, under registered cover, wherein she had requested for grant of leave of two years with effect from 12/07/2011, i.e. from the date of her willful absence from duty. The Director of Education, FATA, Peshawar forwarded the leave application of the accused Principal to the Social Sector Department, FATA Secretariat for necessary action. But the same was returned to the Director of Education, FATA, with the observations that the leave application of the accused Principal was neither on the "prescribed leave application form" nor supported by the requisite "leave admissibility report" of the Agency Accounts Officer, Kohat.

It was also found that just after publication of the absence notice in The Daily Mashriq, Peshawar dated 02/08/2012, one Mr. Jameel Khan Afridi, the brother-in-law of the accused Principal, had also submitted an application dated 06/08/2012, addressed to the Secretary, Social Sector Department, FATA Secretariat wherein it was stated that his sister-in-law, Mst. Imrana Ghafoor, had been missing since the date of missing of her husband Dr. Shakeel Afridi. He stated in the application that none of his family members know the where about of Mst. Imrana Ghafoor. He had further made request to the competent authority that in such circumstances the disciplinary action, whatsoever, initiated against the accused Principal should be suspended till her recovery (Annex-V).

Attested
S/10 P/11



91

Conclusion

The conclusion, derived from the foregoing enquiry proceedings, carried out in light of the entire available record, is submitted hereunder for consideration of the competent authority:-

1. The accused Principal, Mst. Imrana Ghafoor wife of Dr. Shakeel Afridi has been absent from duty since 12/07/2011, due to arrest of her husband, without intimation to the competent authority well in time.
2. The accused Principal, Mst. Imrana Ghafoor had submitted leave application to the Director of Education, FATA, Peshawar, through postal service under registered cover, on 14/10/2012 i.e. after lapse of 15 months and 03 days of her willful absence.
3. Though the charge of willful absence against the accused Principal, Mst. Imrana Ghafoor, Principal Government Girls College, Darra Adam Khel, F.R Kohat has been established yet it seems unintentional on her part while she was facing / confronting with some hard situation due to arrest of her husband Dr. Shakeel Afridi and in such circumstances she couldn't apply for leave, well in time. , However, her father had informed the department about the circumstances through which the accused Principal was passing at that time.
4. However, it is noteworthy that the reasons of her absence etc. have not been told or written by her, they are from her father side which weakens her stand. If the competent authority deems appropriate, may give an opportunity to the accused Principal, Mst: Imrana Ghafoor, for personal hearing.

Attested


~~Dr. Sulaiman Khattak~~

Principal,
Government College, Takht Bhai (Mardan) /
Enquiry Officer

CHARGE SHEET.

Amir
22

I, Amir Haider Khan Hoti, Chief Minister Khyber Pakhtunkhwa as competent authority hereby charge you Ms. Inrana Ghafoor, Associate Professor (BPS-19) Govt. Girls Degree College Dara Adam Khel FR Koht have rendered yourself liable to be proceeded against, as you committed the following acts / omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, as follows;

- a. That you have been found willfully absent from duty w.e.f. 12.07.2011 till date and thus violated the Govt; of Khyber Pakhtunkhwa, Efficiency & Discipline Rules 2011.
 - b. That a notice of absence was published in the daily "MASHRIQ" and "AAJ" on 02.08.2012 to resume your duty within 5-days but all in vain.
2. By reason of the above, you appear to be guilty of mis-conduct under Rule-3 of the Khyber Pakhtunkhwa, Government Servants (E&D) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.
3. You are therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the Inquiry Officer /Inquiry Committee as the case may be.
4. Your written defence if any, should reach the Inquiry Officer / Inquiry Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegations is enclosed.

Attested
[Signature]

A. Hoti

(AMIR HAIDER KHAN HOTI)
CHIEF MINISTER KHYBER PAKHTUNKHWA

DISCIPLINARY ACTION.

23

I, Amir Haider Khan Hoti, Chief Minister Khyber Pakhtunkhwa, as Competent Authority, am of the opinion that Ms. Imrana Ghafoor, Associate Professor (BPS-19) Govt. Girls Degree College Dara Adam Khel FR Kohat has rendered herself liable to be proceeded against as she committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011:

STATEMENT OF ALLEGATIONS

- i. That she has been found willfully absent from duty since 12.07.2011 till date and thus violated the Govt. of Khyber Pakhtunkhwa, Efficiency & Discipline Rules 2011.
- ii. That a notice of absence was served upon her through daily "MASHRIQ" and "AAJ" on 02.08.2012 to resume her duty within 15-days but she failed to respond so far.

2. For the purpose of enquiry against the said accused with reference to the above allegations, an inquiry officer/inquiry committee, consisting of the following, is constituted under Rule-10 (1)(a) of the ibid rules :-

- i. Professor Dr Sulwana Khallab (BS-20)
- ii. _____

3. The enquiry officer / enquiry committee shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused; record its findings and make, within 30-days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the Department of Higher Education shall join the proceedings on the date, time and place fixed by the enquiry officer / committee.

A. H.

(AMIR HAIDER KHAN HOTI)
CHIEF MINISTER KHYBER PAKHTUNKHWA

Attested
By _____

24

Annexure - B.



GOVERNMENT OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARIES
DEPARTMENT

Registered Post

No.SO(C-I)HE/2-135/05/Imrana Ghafoor
Dated Peshawar the 21/12/2012

Prof. Muhammad Suleman Khattak,
Principal Govt; Degree College,
Takht Bhai (Mardan).

Subject: - DISCIPLINARY PROCEEDINGS AGAINST MS. IMRANA GHAFOOR, PRINCIPAL (BS-19) GOVT; GIRLS COLLEGE DARA ADAM KHEL (FR KOHAT) ON THE BASIS OF HER WILLFUL ABSENCE.

I am directed to refer to the subject cited above and to state that the Competent Authority (Chief Minister) has been pleased to appoint you as Enquiry Officer in the subject case. The Charge Sheet / Statement of Allegations are sent herewith to be served upon the accused officer.

It is, therefore, requested to kindly conduct enquiry, serve the Charge Sheet upon the accused officer and furnish report thereof to this Department within 25-days of the receipt of this letter, please.

Encls: As above.

Atkell
11/11/11

21/12/12
(PIR MUHAMMAD KHAN)
SECTION OFFICER (COLLEGES-I)

Endst: No. & Date as above.
Copy to the :-

1. Director, Higher Education Khyber Pakhtunkhwa Peshawar, with the request to do the needful.
2. Section Officer (Estab-II) FATA Secretariat Coordination & Administration Department Warsak Road Peshawar, w/r to his letter No.FS/E-II/1-22/Imrana Ghafoor/16937-38 dated 15/11/2011.

Mr. Aziz Muhammad
1/10
[Signature]

SECTION OFFICER (COLLEGES-I)

25

Annexure - C



Establishment Section

FATA SECRETARIAT
(COORDINATION & ADMINISTRATION DEPARTMENT)
WARSAK ROAD PESHAWAR

ORDER

Mst. Imrana Ghafoor Associate Professor/Principal (BS-19) is hereby transferred from Government Girls Degree College Ekkaghund Mohmand Agency to Government Girls Degree College Dara Adam Khel FR Kohat against the vacant post of Principal (BS-19) with immediate effect, in the interest of public service.

SECRETARY (ADMN & COORD)

No.FS/E/100-80 (Vol-5)/ 3485-93

Dated 29/3/2011

Copy to:-

1. Director Education (FATA)
2. Agency Education Officer Mohmand Agency
3. Agency Education Officer FR Kohat
4. Principal, GGDC Dara Adam Khel FR Kohat
5. Principal, GGDC Ekkaghund Mohmand Agency
6. Agency Accounts Officer Mohmand Agency
7. District Accounts Officer Kohat
8. PS to Secretary (Admn & Coord) Department, FATA Secretariat
9. Officer concerned

Atteed
29/3/11

Put up on file. 13/4/11
AB

(Muhammad Abbas Khan)
Section Officer (Estab)

Handwritten notes and signatures in the bottom left quadrant, including '24/4/11' and '6/4/11'.

Handwritten notes and signatures in the bottom right quadrant, including '24/4/11', '6/4/11', 'Find out name', 'Admin not in', 'FATA', 'SECY (ABC)', and '29/3/11'.

26

Annexure- D

CERTIFICATE OF TRANSFER OF CHARGE

(1) Certificate that we have on the fore ~~after~~ noon of this day, respectively made over and recieved charged of the office of the principal, Govt Girl Degree college Darra Adam Khel

(2) Particulars cash and important secret and confidential document handed over are noted on the reverse:-

Signature of relieved..... *Rahced*

Government Servant..... Miss, Raana Raheed

Station D.A Khel

Designation..... Asstt: Prof: of Law (D.D.C)

Date 01-04-2011
(T.K)

Signature of relieving..... *[Signature]*

Government Servant... Mrs, IMARA GHAFOR.

Designation : Principal. (B+19)

Endt No 166-70 dt 01-4-2011

Forwarded to the

- (1) D.E.Fata (K.P.K) Peshawar. W/Ref: Secy Adm:& Coor No, PS/1/100-80 (Vol-5) 3485-93
- (2) Director Higher Education (K.P.K) W/R to Secretary Higher Education dt. 29.3.2011.
- (3) (K.P.K) Peshawar. No.
- (4) D.A.O Kohat
- (5) Principal G.G.C Jamrud
- (6) Principla G.G.C Ekkaghund
- (7) Lecturer Concerned
- (8) Officer Concerned.

[Signature]
Principal
Govt : Girl College
Darra Adam Khel
G.G.D. College,
D.A. Kohat.

Attended
[Signature]

182 Date 11/8/2011.

ANNEXURE - 2
27

The Principal,
Govt: Girls Degree College,
Lara Adam Mohl (P.R. Kohat).

The Director of Education,
P.A.S.A (S.P.A) Peshawar.

Subject:-

NON-AVAILABILITY OF PRINCIPAL.

It is submitted that Mrs. Larana Khanfoor
Principal of this college run the college Affairs up till now, but from
the last 12th July 2011, the Clerical and teaching staff have contacted
her on her Landline and cell phone, but they are going off. We even went
to her house many times, but she was not available in her house. She has
vacated the house and has not left for us any contact number or address.
No body knows her whereabouts.

The college Affairs could not be run without
the principal. Now there is need for her signature on pay bills/other official
papers. Also the College P/Fund Cheque Book and Stamp is within her custody.

It is therefore requested that this office
may kindly be guided in this matter.

Per
Principal,
Govt: Girls Degree
College Lara Adam Mohl
(P.R. Kohat).

Attested
for P.A.S.A

28

Annexure-F



FATA SECRETARIAT
(COORDINATION & ADMINISTRATION DEPARTMENT)
WARSAK ROAD PESHAWAR

ORDER :-

The following posting/transfer of officers of Education Department (FATA) is hereby ordered with immediate effect, in the interest of public service:-

S.No	Name & Designation	From	To	Remarks
	Mst. Imrana Ghafoor, Principal (BS-19)	Principal GGDC Darra Adam Khel FR Kohat	Placed at the disposal of D.E(FATA)	
	Mst. Rana Naheed, Asstt. Professor (BS-18)	Asstt. Professor GGDC Darra Adam Khel FR Kohat	I/C Principal/ DDO GGDC Darra Adam Khel FR Kohat	Vice S.No

SECRETARY (ADMIN & COORD)

Ref: S/E-III/1-1/ 14/158-64
Dated: 12/9/2011

Copy to:-

- Director Education (FATA).
- Additional Accounts Officer (KFK) sub office Peshawar.
- Agency Education Officer Darra Adam Khel FR Kohat
- Agency Accounts Officer Darra adam Khel FR Kohat
- PS to Secretary (Admn & Coord) Department, FATA Secretariat.
- Officers concerned.
- Office copy.

Attended
10/9/11

(Aasma Arif)
Section Officer (Estab-II)

Dismissed.
Ask DDO to
top her
salary.

11/9/11
DDO
DA

Annexure - H

15

To: Director Higher Education FATA KPK

Subject: Intimation about Principal GGDC Dara Adem Khel FR Kohat

With due respect it is intimated that my daughter, Imrana ~~Ghafoor~~ is serving as Principal GGDC Dara Adem Khel FR Kohat. She is staying at a safe place as per the advice of security agencies due to the case of her husband, Dr. Shakeel Khan. She is therefore not in a position to attend the duty till such time advised otherwise. Submitted for information, please

Yours Sincerely

Copy to Deputy Director Higher Education FATA KPK

Abdul Ghaffar

22.9.2011

Mob. # 0354-5209566

72618/2011

ADDE

put up

Attested

Signature

26/9/11

As directed
76/27/11

7159/27/11
27/9/2011

(Stamp)

(31)

فانا سیکرٹریٹ
سوشل سیکرٹری ڈیپارٹمنٹ، پشاور

Annexure - I

نوٹس غیر حاضری

آپ مسماہ عمرانہ غفور پرنسپل گورنمنٹ گرلز ڈگری کالج درہ آدم خیل ایف آر کوہاٹ مورخہ 12.7.2011 سے ڈیوٹی سے غیر حاضری میں۔
تمام تر کوششوں کے باوجود آپ ڈیوٹی پر حاضر نہیں ہوئی۔ آپ کی سہولت کی خاطر سیکشن آفیسر (اسٹیبلشمنٹ - II) ایڈمن اینڈ کوارٹر سیکشن
ڈیپارٹمنٹ فانا سیکرٹریٹ پشاور نے بذریعہ چھٹی نمبر فانا سیکرٹریٹ / ای - 1 / 11 - 84 / 14158 - 1 مورخہ 12.9.2011 آپ کی سروس
ڈائریکٹر ایجوکیشن فانا کے حوالے کی تاکہ آپ ڈیوٹی پر حاضر ہو جائیں۔ مگر آپ ڈیوٹی پر حاضری دینے میں ناکام رہی۔ آخر کار آپ کی ماہانہ
تنخواہ روک دی گئی مگر آپ بدستور ڈیوٹی سے غیر حاضر ہیں۔

لہذا آپ کو مطلع کیا جاتا ہے۔ کہ اشتہار ہذا کی اشاعت کے بعد 15 دن کے اندر اندر دفتر ہذا میں رپورٹ کر دیں۔ بصورت دیگر حاکم مجاز
رولز 8 (A) گورنمنٹ سروس (E & D) رولز 1973 کے تحت یکطرفہ کارروائی کر کے آپ کو مورخہ 12.7.2011 سے ڈگری سے
برطرف کیا جائے گا۔

A. S. Wani
سیکرٹری

سوشل سیکرٹری ڈیپارٹمنٹ

فانا سیکرٹریٹ در سبک روڈ، پشاور

Attest
[Signature]

==

To
The Director Higher Education
FATA KPK

Subject: Leave Application

Respectfully it is stated that in view of the peculiar circumstances, I am facing due to the case of my husband (Dr.Shakeel Afridi), it is not possible for me to attend my duty forthwith. However as and when I am advised by security agencies, I shall report to my duty without further delay. Furthermore, an intimation report about my position has already been received in your office on 26-09-2011. (Copy of the receipt is attached herewith).

In the light of above mentioned facts it is requested to kindly grant me leave for the period of two years w.e.f 12-07-2011.

Thanking you in anticipation

Mrs.Imrana Shakeel
Associate Professor Zoology

DATED:14-10-2012

COPY TO:

- (1) The PS to Secretary education.
- (2) Deputy Director female colleges FATA

Put up in
lock file
23/10/12

23/10/12

REGISTERED

33

Annexure - J-1

To,

The Director Higher Education

GOVT OF Khyber Pakhtunkhwa

F.A.T.A Secretariate

Warsak Road
Peshawar

Abdul
Ghaffar

From

176

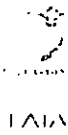
Abdul Ghafoor

H No 115, Street 8

Sector H-3 Phase-2

~~Muzaffar~~ Peshawar





DIRECTORATE OF EDUCATION
(FATA), SECRETARIAT
WARSAK ROAD PESHAWAR
Phone No. 091-9210166 Fax No. 091-9210216

Ammeaur-K

(34)

No. 13879 / F-75/Imrana Ghafoor
Dated Peshawar the 1/11 /2012

To
The Section Officer (Edu).
Social Sectors Deptt:
FATA Secretariat.

Subject: LEAVE APPLICATION.

Memo

I am directed to enclose herewith self explanatory application in r/o Mrs Imrana Shakeel Afridi on the above cited subject for onward submission to the Higher Education Deptt: Khyber Pakhtunkhwa for necessary action being competent authority.

It is added that her absence report has already been conveyed to your Department on 17.8.2012 and notice of her absence has also been issued to her in the news paper 2.8.2012.

Sabihazeb

Dy: Directress (Colleges)

*Assn:
Put up
file A*

(Ag) 5/11/2012

Handwritten signature



**DIRECTORATE OF EDUCATION
(FATA), FATA SECRETARIAT**
Phone No. 091-9210166 Fax No. 091-9210216

11
Annexure - L
35

No. 13006

Dated Pesh: the 9/9/2011.

To

The Principal
Govt. Girls Degree College
Darra Adam Khel FR Kohat.

Subject:- **STOPPAGE OF MONTHLY SALARY.**

I am directed to inform you that the monthly salary in r/o Mst. Imrana Ghafoor, Associate Professor/Ex-Principal may be stopped with immediate effect due to long willful absence from her duty with a copy for intimation to this Directorate.

Sabihazeb

Deputy Director (Colleges)

g

Atul
Op/

Annexure - ~~14~~ M

36

To

Mr. Muhammad Suliman Khattak
Inquiry Officer, in Case of
Mrs. Imrana Ghafoor Ex-Principal.

The statement of Incharge Principal/D.D.O. Govt:
Girls Degree College Darra Adam Khel (FR Kohat) in connection with
the Inquiry of Mst Imrana Ghafoor Ex-Principal Govt: Girls College
Darra Adam Khel. 09

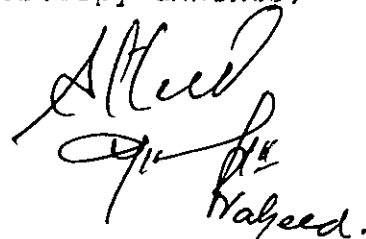
On 1.4.2011 (P.N.) Mst Imrana Ghafoor took over charge as Principal (B-19) in this college (Copy annexed)

In the Mid of July 2011, Muhammad Amin Supdt: and Shakirullah S/C of this college came to me and told that Mst: Imrana Ghafoor (Principal) is not available. They came to me many a time that the Principal had vacated her house and her ^{house} was closed. They had contacted her on her Phone No. 5890050 but no body received their call. They told me that many official works are pending for her Signature, and college private Fund Cheque Book and college stamp was with her. I also contacted her on her cell no, 03339114244, but her cell was off.

On 11th August 2011, the college Supdt; wrote a letter to Director of Edu: FATA Peshawar and requested me to forward the letter. So as a Senior staff member of the college, I forwarded the same (Copy annexed),

On 19th Septer 2011, I was given the charge of D.D.O/ Principal of the college (Copy annexed) and also received a letter from the Director of Education Office Peshawar for the stoppage of Mst: Imrana Ghafoor, s salary (Copy annexed). In the light of the letter, I stopped her salary w.e.f. 1/9/2011 (Copy annexed).

On 19th Nov: 2012 I forwarded a letter to the S/O. Social Sector (Edu) FATA Secretariat Peshawar that this office is continuously showing Mst: Imrana Ghafoor Ex-Principal as absent in the staff statement of the college, as this office has no information about her case, and her record is incomplete. In reply of our letter, the Additional Director of Edu: FATA Peshawar sent a letter that Mst: Imrana Ghafoor has applied for Earned leave and her case is under process (Copy annexed)


Waheed.

Principal
Govt: Girls Degree College
Darra Adam Khel (FR Kohat)

16/1/2013.

37

Annexure-N



**DIRECTORATE OF EDUCATION
(FATA), FATA SECRETARIAT**
Phone No. 091-9210166 Fax No. 091-9210216

Subject:- NON-AVAILABILITY OF PRINCIPAL.

1. As per report of the staff of GGDC Darra Adam Khel FR Kohat at F/A Mst. Imrana Ghafoor Principal (BPS-19) GGDC Darra Adam Khel FR Kohat has not been attending the college since 12.7.2011. The staff trying to contact her on her home telephone and mobile cell but no response is received.
2. As a principal her presence is required for signing / countersigning the bills / cheques and making other correspondence with the department. But, due to her absence the staff faces great hardships in getting their salaries and dealing other service matters.
3. It is, therefore, proposed that her services may be suspended with effect from 12.7.2011 and enquiry conducted in the matter. Mst Rana Naheed Asstt: Professor (B-18) of the same college/declared as I/C Principal / DDO for the college till further order, please.

Director Education FATA

Secretary A&C FATA

Annexure-0



**DIRECTORATE OF EDUCATION
(FATA), FATA SECRETARIAT**
Phone No. 091-9210166 Fax No. 091-9210216

Subject:- Suspension of Mst.Imrana Ghafoor Associate Professor/Principal
Govt. Girls Degree College Darra Adam Khel FR Kohat.

1. As per report of the staff of Govt. Girls Degree College Darra Adam Khel FR Kohat at (F/A) Mst.Imrana Ghafoor, Associate Professor (B-19) Principal of their college has not been attending the college since 12.7.2011. The staff is trying to contact her on her home telephone and mobile cell but no response is received.
2. On the request of the undersigned vide (F/B), Mst.Rana Naheed, Assistant Professor (B-18) of the same college has been declared as I/C Principal/DDO for the establishment of Govt. Girls Degree College Darra Adam Khel FR Kohat and the services of Mst.Imrana Ghafoor placed at the disposal of this Directorate vide Section Officer (E-II)FATA Secretariat vide her office order No.FS/E-II/1-1/14158-64, dated 12.9.2011. But she has not yet reported to this office. His father in his letter at (F/C), has reported that she is staying at safe place as per advice of security Agencies due to the case of her husband Dr.Shakeel Afridi and cannot attend duty.
3. It is therefore suggested that the services of the officer concerned may be suspended OR placed at the disposal of Secretary Higher Education Department for necessary action, being an employee of Provincial cadre, please.

Secretary A&C FATA

o/c Director Education FATA
[Handwritten Signature]

39

DIRECTORATE OF EDUCATION
(FATA), SECRETARIAT
WARSAK ROAD PESHAWAR
Phone No. 091-9210166 Fax No. 091-9210216

Annexure-P

No. 13879 / F-75/Imrana Ghafoor
Dated Peshawar the 1/11/2012



The Section Officer (Edu).
Social Sectors Deptt.
FATA Secretariat.

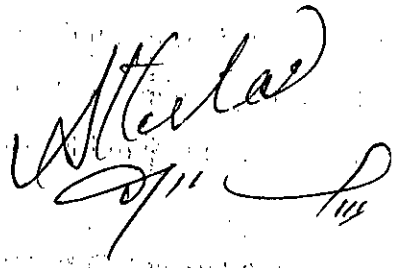
Subject: LEAVE APPLICATION.

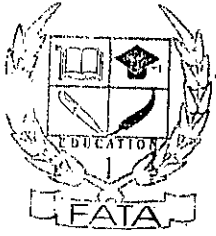
Memo:

I am directed to enclose herewith self explanatory application in r/o Mrs. Imrana Shakeel Afridi on the above cited subject for onward submission to the Higher Education Deptt. Khyber Pakhtunkhwa for necessary action being competent authority.

It is added that her absence report has already been conveyed to your Deptt. on 17.8.2012 and notice of her absence has also been issued to her in the news paper 2.8.2012.


2. Dy: Directress (Colleges)






Annexure-2

40

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216
No. /
Date Pesh: the / / 2012

STATEMENT REGARDING INQUIRY AGAINST MST. IMRANA GHAFOOR
ASSOCIATE PROFESSOR.

1. It is submitted that Ms. Imrana Ghafoor, was reported absent from the college, by the staff of GGDC, Dara Adam Khel FR-Kohat.
2. The Principal, GGDC, Dara Adam Khel, were asked to stop her monthly salaries.
3. Note for her suspension were submitted to Administration & Coordination Department FATA.
4. An other note for suspension / placing her services at the disposal of Higher Education Department sent to Administration & Coordination Department (FATA).
5. Her where about asked by Additional Police General and for the purpose note to his office conveyed.
6. Also note submitted to Social Sector Department.
7. Social Sector Department published her absence report into news papers.
8. Her leave application received through Register cover on 23-10-2012, and conveyed to Section Officer(Education) FATA Secretariat which is under process.

Sabihazeb
16/11/13
Dy: Director (Colleges)

Attested
[Signature]



FATA SECRETARIAT
Social Sectors Department
Warsak Road Peshawar

41

Annexure R

No. FS/SSD/SO(E)/LC/FR Pesh Kohat 7990
Dated Peshawar the 01/01/2013

To, ✓ The Director Education,
FATA, Peshawar.

Subject - LEAVE APPLICATION.
Memo:

I am directed to refer to the Deputy Directress (Colleges) Directorate of Education FATA letter No. 13879/F-75/Imrana Ghafoor, dated 01.11.2012 on the above cited subject.

It is submitted that Mst. Imrana Ghafoor has addressed her application to the Director Higher Education Khyber Pakhtunkhwa under intimation to the PS to Secretary Education and Deputy Directress (Colleges) FATA. Hence we may wait till the response of the Director Higher Education Khyber Pakhtunkhwa is received.

Nov 11/2012
Section Officer (Edu:SSD)

Endst No. _____
Copy forwarded to the:

PS to Secretary Social Sectors Department FATA Secretariat.

J 3/1/2013

Section Officer (Edu:SSD)
15370
4/1/2013

No Follow up is required if no action for case.
ADD (E) Peshawar
Process for pressure account
04/1/13
03/1/13
04/1/13/DD

Statement of section officer (Bdun) social
Sector Department, FATA Secretariat, Peshawar.

The leave application as well as absence report
of Mst Imrana Chafar, Principal GEC DAIKhel
was submitted by the P.O. FATA. The leave
application was not under proper format &
without admissibility report of the concerned
AAO, therefore, returned to the DE FATA.
for ^{doing the needful} further action. However, the absence report
was sent to the Secretary Higher Ed. Div.
K.P. (being competent authority of the
Principal concerned) for ~~necessar~~ taking
disciplinary action against the ~~accu~~
absent Principal concerned.

Adun
S.O (Edu:SSD) -
Director of Education
(FATA) D.V.P.P. Peshawar (P.O.)
Attested
[Signature]

43

Annexure-U

Secret

Special Branch

From: The Addl: Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa, Peshawar.

To: The Director Education FATA,
Khyber Pakhtunkhwa, Peshawar.

No. 1957-PA/5B dated, Peshawar the 26/03/2012

Subject: PRESS CLIPPING REGARDING THE WHEREABOUTS OF DR. SHAKIL AFRIDI'S FAMILY

After the arrest of Dr. Shakil Afridi for his involvement and assisting in OBL operation at Abbottabad, he was dismissed from service along with four LHV's by the provincial Government. His wife Imrana Ghafoor was serving as Principal in Government Girls College, Dara Adam Khel in BPS-19. This establishment may kindly be informed of her complete profile and any disciplinary action taken against her on your record.

For

For Addl: Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa Peshawar

Attested

5005
PA/5B

29/3/12

بخدمت جناب سیکرٹری سوشل سکیورٹی ڈیپارٹمنٹ، فائنا سیکرٹریٹ ورسک روڈ پشاور (خیبر پختونخواہ)

عنوان: درخواست برآمد جواب نوٹس غیر ماضی۔

جناب عالی۔

گزارش ہے کہ میں نے مورخہ 02 اگست 2012 روزنامہ مشرق میں مسماٹ عمرانہ غفور پرنسپل گورنمنٹ گرلز ڈگری کالج درہ آدم خیل ایف آر کواہٹ کی غیر حاضری کا نوٹس پڑھا۔

جناب عالی۔ گزارش ہے کہ میں ڈاکٹر تکلیف آفریدی کا حقیقی بڑا بھائی ہوں۔ جبکہ مسماٹ عمرانہ غفور میری بھابی اور ڈاکٹر تکلیف آفریدی کی بیوی ہے۔ جب سے ڈاکٹر تکلیف آفریدی کے ساتھ انتہائی حساس اور سنگین الزامات کا واقعہ پیش آیا ہے۔ اور وہ لاپتہ ہوئے اس دوران سے میری بھابی مسماٹ عمرانہ غفور اور ان کے بچے بھی گھر سے لاپتہ ہیں۔ انتہائی کوششوں کے باوجود بھی ابھی تک ان کا کوئی سراغ نہ مل سکا کہ وہ کہاں پر ہیں۔ نہ تو اپنے ماں باپ اور بہن بھائیوں کے پاس ہیں اور نہ ہی کسی عزیز رشتہ دار کے پاس جس کی وجہ سے ہم کو بھی سخت پریشانی لاحق ہے۔ بندہ اور اس کا خاندان ان حالات کی وجہ سے بہت مشکلات کا شکار ہے۔

ان مشکل حالات میں آپ سے بذریعہ درخواست ہذا گزارش ہے کہ جب تک مسماٹ عمرانہ غفور کا شمس جیل جاتا یا خود انہیں کسی طرح سے یا کسی ذریعہ سے اس نوٹس کے بارے میں علم نہیں ہو جاتا تب تک نوٹس ہذا کو معطل فرمایا جائے۔ اور کوئی نکلانہ کاروائی نہ کی جائے کیونکہ کوئی بھی ذمی شعور اتنی پزیرشکشا ملازمت جان بوجھ کر دواؤ پر نہیں لگا سکتا اور اپنا مستقبل خراب نہیں کر سکتا۔ لہذا جناب سے استدعا ہے۔ کہ درخواست ہذا پر ہمدردانہ غور فرماتے ہوئے منظور فرمایا جائے۔

جناب کی عین نوازش ہوگی

1/8/12

ABSAI /
put up
w/mediation
العارض:

جیل خان آفریدی ولد میوہ خان آفریدی چک 20/8R آفریدی آباد تحصیل میاں چنوں ضلع خانیوال (جناب)

شناختی کارڈ نمبر: 36104-2150523-1

موبائل نمبر: 0306-4426563

دستخط: 06-8-2012

AD/E/C/PT/2

10502

13/8/12

150

کاپی برائے اطلاع:

1۔ گورنر صاحب خیبر پختونخواہ

2۔ چیف سیکرٹری صاحب خیبر پختونخواہ

3۔ ڈائریکٹر فائنا۔ (ایجوکیشن)

17391-1423627-9
محمد زبیر (مدرسہ اسلامیہ کمالی)

AD/E
1/8/12

Handwritten signature and initials.

والد عبد الفتوح

22-9-12

0306-5209566

45

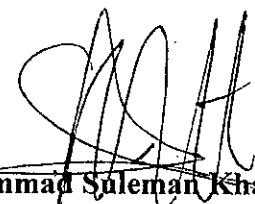
(1)

10/3

Annexure-I

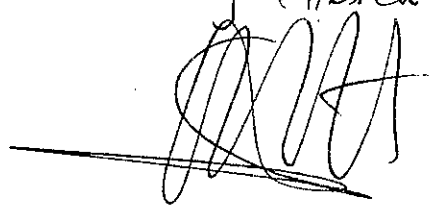
Certificate

It is Certified that the Enquiry Report regarding willful absence from duty in respect of Mst. Imrana Ghafoor, Government Girls Degree College, Dara Adam Khel, FR Kohat, is consist of ^{09 (Nine)} ~~Six (06)~~ pages plus Twenty Two (22) Annexures and every page as well as annexure is duly signed / countersigned by me.



(Prof. Dr. Muhammad Saleman Khattak)
Principal,
Government College, Takht Bhai (Mardan) /
Enquiry Officer

Authentic attested



Attested
Signature



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

Annexure 9 (46)

Dated Peshawar the 06/02/2015

2793-6

NOTIFICATION

NO.SO(C-1)/HED/2-135/05/Imrana Ghafoor. The Competent Authority is pleased to order the "Removal from Government Service" of Ms. Imrana Ghafoor, Associate Professor (BPS-19)/ Principal, Government Girls Degree College, Dara Adam Khel (F.R. Kohat), with immediate effect, on account of her long willful absence from duties.

Note: The absence period w.e.f 12.07.2011 will be treated as un-authorized absence from duties without pay.

SECRETARY
HIGHER EDUCATION DEPARTMENT

Endst. No. & Date even.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. The Director of Education FATA, Warsak Road Peshawar.
4. The Principal, Government Girls Degree College, Dara Adam Khel (FR Kohat).
She is requested to make sure that her salaries are stopped with effect from the date of her absence.
5. The District Accounts Officer, Kohat.
6. The Manager, Government Printing Press Peshawar.
7. The Assistant Director (EMIS) Higher Education Department.
8. The officer, concerned.

1072/15
1000 (CP)

1072
CAJDF x

Section Officer (C-1)

RECEIVED ON
11 FEB 2015

47

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

PHONE #091-9211025, 9211803, 9213009, 9210242 FAX # 091-9210215

NO. 26988 /CA-I/Estt: Branch/A-12/Ms. Ms. Imraha Ghafoor/ Zoology Dated Peshawar; the 26/10 /2014

To

The Deputy Secretary (Colleges)
Govt: of Khyber Pakhtunkhwa,
Higher Education Department,
Peshawar.

Subject: **DISCIPLINARY PROCEEDING AGAINST MS. IMRANA
GHAFOOR PRINCIPAL (BPS-19) GGC,DARA ADAM KHEL (FR
KOHAT) ON THE BASIS OF HER WILLFUL ABSENCE.**

Memo

I am directed to refer to your office letter No.SO(C-I)HE/2-135/05/ Imrana Ghafoor/955 dated 22-07-2014 on the subject noted above and to state that Show Cause notice was sent to the lady concerned on three different available addresses of the lady concerned under registered cover vide this office letter No. 17753-55 dated 22-08-2014 but two letter have returned to this office by the Post Office department with the remarks that lady concerned is not on the available addresses (Copies of envelopes are enclosed). However it is not known whether third letter has been delivered to her or not or as the same has not been returned back to this office .

It is, therefore, requested that further action may be taken as per rules, please.

SO C/I-57
28/10

[Handwritten signature]

[Handwritten signature]
DY. DIRECTOR (FEMALE)

2/11/27
28/10

48

2

Tr (RSD)

376

(376)

Attended
for

R-1609

(MS) Muzna Ghafoor

PESHAWAR KITCHEN
PESHAWAR

1/0 Muzna Ghafoor

H No 115 Street No 8

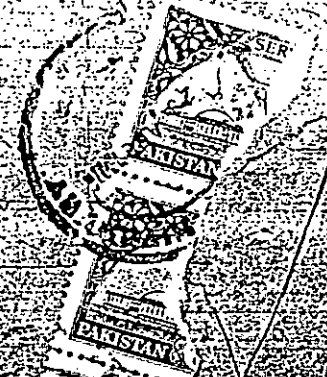
of Sector 10 Phase II

Hayatabad Restaurant (Restaurant)

69

Handwritten text in Urdu script, possibly a recipient's name or address.

Handwritten signature or name in Urdu script.



Handwritten signature or name in Urdu script.



Alfred
Simpson

12 (Row)

1508

RESHAYAR KUTCHERY
RESHAYAR

~~MS / Mencia Gk. Door~~

~~No. Abdul Gk. Door~~

~~Eng. Sumbail Road~~

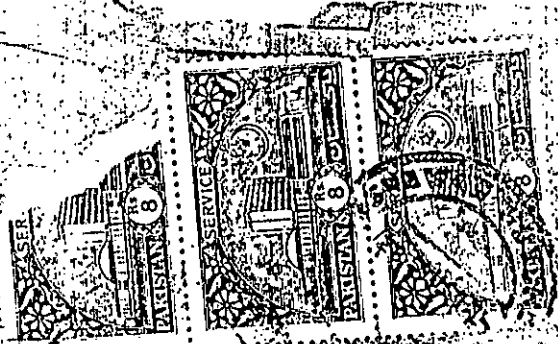
~~Centre Park P.O.F.S~~

~~Wah cant~~

866

alt

57



Handwritten address in Urdu script:
میرزا محمد علی صاحب
گورنمنٹ ہائی اسکول
کراچی

Handwritten signature:
A. W. Khan

52

COURT CASE



**GOVERNMENT OF KHYBERPAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES & LIBRARY DEPARTMENT**

AUTHORITY LETTER

Mr. Qazi Muhammad Ayaz , Section Officer (Litigation), BPS- 17, of Higher Education Department Civil Secretariat, Peshawar is hereby authorized to submit Joint Parawise Comments in the Khyber Pakhtunkhwa, Service Tribunal, Peshawar in Service Appeal No. 105/2023 titled Imrana Ghafoor Vs Govt of KPK on behalf of official respondents.

**DEPUTY SECRETARY (Litigation)
Govt of Khyber Pakhtunkhwa
Higher Education Archives &
Library Department**

Attested