



23rd May, 2023

1. Learned counsel for appellant present. Mr. Muhammad Jan, District Attorney for respondents present.
2. Learned counsel for appellant made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 16.08.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar

Mutazem Shah


(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

16.08.2023

1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand learned Additional Advocate General for the respondents present.
2. Due to summer vacations D.B is not available, therefore, case is adjourned. To come up for arguments on 03.11.2023 before D.B. P.P given to parties.

SCANNED
KPST
Peshawar

Kaleem Ullah


(Rashida Bano)
Member (J)


8644/20

05th Dec. 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Tauheed Iqbal, AD for the respondents present.

Former seeks adjournment due to engagement of learned senior counsel for the appellant in Honourable Peshawar High Court today. Last opportunity is further extended subject to payment of cost of Rs. 5000/-. To come up for arguments and cost on 02.03.2023.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

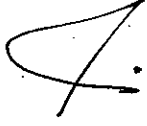
02.03. 2023

Clerk of learned counsel for the appellant present. Mr. Touheed Iqbal, Assistant Director alongwith Mr. Umair Azam Khan, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments as well as cost of Rs. 5000/- on 23.05.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

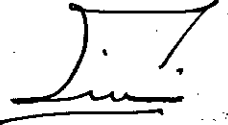
27.06.2022

Mr. Mujeeb-ur-Rehman, (junior of learned counsel for the appellant) present. Touheed Iqbal, Assistant Director alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 04.10.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member (J)

04th Oct, 2022

Counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Learned counsel for the appellant seeks adjournment as he has not prepared the case. Last opportunity granted for arguments failing which the case will be decided on the available record without arguments. To come up for arguments on 05.12.2022 before the D.B



(Fareeha Paul)
Member(Executive)

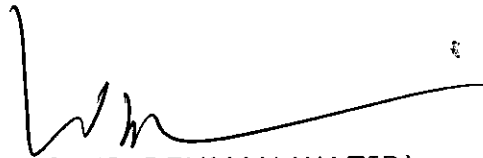


(Kalim Arshad Khan)
Chairman

01.09.2021

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Mr. Touheed Iqbal, Assistant Director (Agriculture) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that due to some domestic engagements, he has not met preparation for arguments. Adjourned. To come up for arguments before the D.B on 29.11.2021.



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

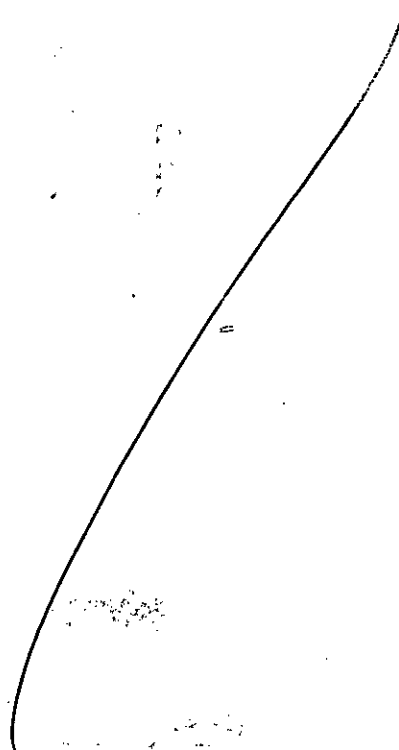
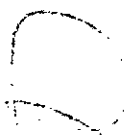
29.11.2021 Due to unavailability of DB, the case is adjourned to 08/03/2022.


Reader

8-3-22

Due to retirement of the Hon,ble chairman the case is adjourned to 27-6-22


Reader



17.11.2020

Counsel for the appellant present.

Contends that the impugned order dated 26.12.2019 was issued by the Secretary, Agriculture, Livestock and Cooperative Department who was not competent for the purpose as the appellant was an officer in BPS-18 at the relevant time. Further, that the requirements of Rule 9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 were not fulfilled before passing of the impugned order. The respondents did away with the charge sheet, statement of allegations and chance of personal hearing as well as final show cause notice before passing the impugned order.

In view of arguments of learned counsel as well as available record, instant appeal is admitted to regular hearing subject to all legal/factual objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 01.02.2021 before S.B.

Appellant Deposited
Security & Process Fee

30/11/20


Chairman

01.02.2021

Junior to counsel for the appellant and Addl. AG alongwith Tauheed Iqbal, AD for the respondents present.

Reply/comments have been submitted on behalf of the respondents. Placed on record. The appeal is assigned to D.B for arguments on 03.05.2021. The appellant may furnish rejoinder, within one month, if so advised.


Chairman

3.5.21

Due to COVID-19, the case is adjourned to 1-9-2021 for the hearing.

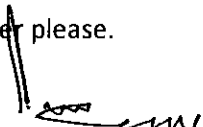




Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 8644 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/07/2020	<p>The appeal of Mst. Shaista Masroor presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	14.09.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/09/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Mr. Afrasyab Wazir, Advocate on behalf of counsel for the appellant present.</p> <p>Requests for adjournment as learned counsel is engaged before the Touring Bench of this Tribunal at Abbottabad. Adjourned to 17.11.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

SCANNED
MPBT
Peshawar

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

APPEAL NO. 8644 /2020

SHAISTA MANSOOR VS EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
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2	appointment order	A	5- 8.
3	Order dated	B	9.
4	Extension order	C	10.
6	Application	D	11.
7	Letter dated 29.11.2018	E	12.
8	Impugned order	F	13.
9	Forwarding letter	G	14.
10	Departmental appeal	H	15- 16.
11	Vakalat nama	17.

APPELLANT

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2020

Mst: Shaista Masroor EX: Deputy Director Out Reach (BPS-18),
O/O Director General, Agriculture Research,
Khyber Pakhtunkhwa Peshawar **APPELLANT**

VERSUS

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary Agriculture, Live Stock & Co Operative Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Agriculture Research, Near Agriculture University, Peshawar.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 03/01/2020 COMMUNICATED TO APPELLANT ON 27/03/2020 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE WAS IMPOSED ON APPELLANT AND AGAINST NOT TAKING ACTION ON DEPARTMENTAL APPEAL OF APPELLANT WITHIN STATUTORY PERIOD OF NINTEY DAYES

PRAYER:

That on acceptance of this appeal the impugned order dated 03/01/2020 communicated to the appellant 27.3.2020 may kindly be set aside and the appellant may graciously be reinstated in to service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise on the present appeal are as under:

- 1- That the appellant was initially appointed as research officer BPS-17 through public service commission by the respondents vide order dated 19/01/2005. That later on the appellant was promoted to the post of Deputy Director out reach. Copy of appointment order is attached as annexure..... **A.**

- 2- That it is pertinent to mention that the husband of appellant was residing in Canada in business connection therefore the appellant applied for ex Pakistan leave in order to join her husband, however she was granted four months Ex Pakistan leave by the respondents vide order dated 18/07/2016. Copy of order dated 18/07/2016 is attached as annexure**B.**
- 3- That the appellant preferred application for extension of ex Pakistan leave for further two years however the respondents extended the ex Pakistan leave only for twenty months i.e. up to 30/06/2018 vide order dated 07/04/2017. Copy of extension order dated 07/04/2017 is attached as annexure **C.**
- 4- That it is worth mentioning that the appellant suffered severe health issues due to premature delivery and she was advised continuous medical treatment and medication by concerned doctor therefore the appellant submitted another application along with medical documents for further extension of six months ex Pakistan leave but the same was not responded. Copy of application for further extension of ex Pakistan leave on medical ground is attached as annexure **D.**
- 5- That later on the appellant was issued absentia notice and was directed to assume duty within 15 days. It is pertinent to mention that appellant replied to the aforementioned notice vide letter dated 29/11/2018 and requested the respondents that she can't assume charge within 15 days due to visa problem of her newborn child and will submit arrival report as soon as visa issue is resolve, Copy of letter dated 29/11/2018 is attached as annexure.....**E.**
- 6- That it is also worth mentioning that when the health and visa issue of appellant was resolved she arrived in Pakistan and submitted her arrival report, however the appellant astonished when she come to know that she has been removed from service vide impugned order dated 03/01/2020. Copy of impugned order dated 03/01/2020 is attached as annexure**F.**
- 7- That thereafter the appellant submitted application for the grant of copy of impugned removal order dated 03/01/2020 and the same was communicated to her on 27/03/2020 vide letter dated 17/03/2020. Copy of forwarding letter dated 17/03/2020 is attached as annexure..... **G.**
- 8- That feeling aggrieved from the impugned order date 03/01/2020 the appellant filed departmental appeal but

ninety days. Copy of departmental appeal is attached as annexureH.

- 9- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds amongst other.

GROUND:

- A- That the impugned order dated 03/01/2020 whereby major penalty of removal from service was imposed on appellant is against the law, facts and norms of natural justice hence not tenable in the eye of law and liable to be set aside.
- B- That the petitioner has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the absence of appellant was not willful rather due to illness and visa problem and in this regard the appellant properly submitted application for extension of ex Pakistan leave on medical grounds.
- D- That it is pertinent to mention that according to revise leave rules 1989 leave on medical grounds can't be refused.
- E- That the appellant has been discriminated on the subject noted above and as such the respondents violated the principle of natural justice.
- F- That no charge sheet, statement of allegation and show cause notice has been served on appellant before issuing of impugned order.
- G- That no regular inquiry has been conducted in the instant case which is mandatory under the rules before imposing major penalty of removal from service.
- H- That no publication has been made in two leading news paper which is mandatory under rule 9 of E&D rules before imposing major penalty of removal from service.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.



AGRICULTURAL RESEARCH SYSTEM
N.W.F.P. AGRICULTURAL UNIVERSITY PESHAWAR.

Office Ph.No.9216529-30

No. 593-617 DGAR

Dated Pesh. the 19-1/2005

OFFICE ORDER

Consequent upon the recommendation of NWFP Public Service Commission approval of the Syndicate NWFP Agril. University Peshawar in its meeting held on 1.1.2005. After fulfil all the codal formalities like Medical Examination, confirmation of antecedents by the Police Department, the competent authority has been pleased to appoint the following candidates as Research Officer in BPS-17 (Rs.6210-465-15510) under contract policy of the Govt. of NWFP circulated vide letter No.FD(SOS)II 12-1/2002 dated 26.10.2002, for a period of three years from the date of arrival on the following terms and conditions.

- 1- The appoint contract will be for a period of three years and they will not claim any right for regular appointment/service in the Agril. Res. Deptt. the contract shall stand automatically terminated on the expiry of the initial period, fresh contract would be executed.
- 2- They will be placed in minimum of BPS-17 of basic pay scales of the Govt. employees under the contract policy.
- 3- They will be entitled for all such allowances and benefits which are admissible under the contract policy of the Govt. of NWFP for the same period.
- 4- Either party can terminate the contract on two months notice or two months salary in thereof.
- 5- They will be Governed by all Rules/Regulations applicable to the Govt. employees of the same category such as leave, training etc.
- 6- They will not contribute of G.P. Fund and will not be entitled for pension and gratuity benefits.
- 7- They will produce a bond duly attested by the Oath Commissioner for acceptance of this contract with the above terms and conditions.
- 8- Their enter-se-seniority will be fixed in the Department as and when their merit list is received from the Public Service Commission.
- 9- No TA/DA will be granted for joining the duty.

S.No.	Name with Father's name	Home District	subject
1.	Miss Ishrat Naz D/O Said Akbar	Nowshera	Plant Pathology
2.	Syed Sartaj Alam S/O Mian Sardar Hassan	Nowshera	Plant Pathology
3.	Miss Alia Zia D/O Ziaud Din	Peshawar	Agril. Chemistry
4.	Mr. Tariq Masood S/O Lal Zada Afridi.	Kohat	Agril. Chemistry
5.	Miss Nadia Noreen D/O Tasim Jan	Peshawar	Agril. Chemistry
6. ✓	Miss Shaista Masroor D/O Muhammad Inayatullah.	Peshawar	Food Technology
7.	Miss Aysha Riaz D/O Riaz Khan	Mardan	Food Technology
8.	Malik Muhammad Hashim S/O Muhammad Ramzan Malik	D.Khan	Food Technology

ATTESTED

[Signature]

9.	Miss Rozina Naz D/O Hazrat Khan	Khyber Agency	Food Technology
10.	Mr. Nasir Khan S/O Faridoon	Swat	Food Technology
11.	Mr. Abdul Sattar Shah S/O Abdul Jabbar Shah	Battagram	Food Technology
12.	Miss Farida Anjum D/O Ghulam Rabbani	Chitral	Agril. Chemistry
13.	Mr. Muhammad Tahir S/O Rehman Said	Muhammad Agency	Plant Pathology

On their appointment, the competent authority further pleased to order the following adjustments/postings.

S.No.	Name with Designation	Name of Group	Place of posting
1.	Miss Ishrat Naz, Res. Officer	Plant Pathology	Plant Pathology Section, ARI, Tarnab (Peshawar)
2.	Syed Sartaj Alam, Res. Officer.	Plant Pathology	-do-
3.	Miss Afia Zia, Res. Officer	Agril. Chemistry	Chemistry Section, ARI, Tarnab (Pesh).
4.	Mr. Tariq Masood Res. Officer.	Agril. Chemistry	-do-
5.	Miss Nadia Noreen Res. Officer.	Agril. Chemistry	-do-
6.	Miss Shaista Masroor Res. Officer	Food Technology	Food Technology Section, ARI, Tarnab (Peshawar).
7.	Miss Aysha Riaz Res. Officer.	Food Technology	Food Technology Section ARI, Tarnab (Peshawar)
8.	Malik Muhammad Hashim Res. Officer.	Food Technology	Agril. Res. Instt. D.I. Khan.
9.	Miss Rozina Naz Res. Officer.	Food Technology	Food Technology Section, ARI, Tarnab (Peshawar).
10.	Mr. Nasir Khan Res. Officer.	Food Technology	Food Technology Section, ARI, Tarnab (Peshawar)
11.	Mr. Abdul Sattar Shah Res. Officer.	Food Technology	Food Technology Section, ARI, Tarnab (Peshawar)
12.	Miss Farida Anjum Res. Officer.	Agril. Chemistry	Chemistry Section, ARI, Tarnab (Pesh).
13.	Mr. Muhammad Tahir Res. Officer.	Plant Pathology	Plant Pathology Section, ARI, Tarnab (Peshawar)

ATTESTED

If they accept the above terms and conditions they should report for duty in their respective stations within a period of 15 days positively failing which the order of the individual treated as canceled.

(2)

Sd/-
(Muhammad Amin)
Director General Research
NWFP Agri. University Peshawar

No. 593-612/Estt/DGAR dated Peshawar the 19/01/2005.
Copy to:-

1. The Director General, Agril. Res. Instt. Tarnab (Peshawar).
2. The Director Soil Plant and Nutrition, ARI, Tarnab (Peshawar).
3. The Director, Agril. Res. Instt. D.I. Khan.
4. The Registrar, NWFP Agri. Uni. Peshawar.
5. The Agril. Chemist (Soils) Agril. Res. Instt. Tarnab (Peshawar).
6. The Plant Pathologist, ARI, Tarnab (Peshawar).
7. The Food Technologist ARI, Tarnab (Peshawar).
8. All concerned.

for information and n/action.

Director General Research
NWFP Agri. University Peshawar

ATTESTED

8

CERTIFICATE OF TRANSFER OF CHARGE.

I Certify that we have on the fore/afternoon of this day respectively made over ~~xxxxx~~ ~~xxxxx~~ ~~xxxxx~~ charge of this office of the
As Research Officer

2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse.

Signature of relieved Government servant.

Designation:

Station. A.R.I, Tarnab (Peshawar)

Signature of relieving Government servants

(MISS SHAISTA MASROOR)

Designation:

Research Officer

Dated. 19.1.2005 (P.N.)

Forwarded to the

N.W.F.P., Acct. Try. No: 42.

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

General Agri. (R.A.)
Diary No: 284
Dated: 22/7/16
Directorate of Agriculture
Khyber Pakhtunkhwa Peshawar

Dated Peshawar, the July 18, 2016

NOTIFICATION.

NO. SOE (AD) 7-66/07-08/RW:-

Under Rule-16 of the Revised Leave Rules, 1981, sanction is hereby accorded to the grant of four (04) months ex-Pakistan leave in respect of Shaista Masroor Assistant Director Outreach (BS-17), Directorate Outreach, Agriculture Research, Khyber Pakhtunkhwa Peshawar, from the date of its availing.

B-9

Sd:-
SECRETARY AGRICULTURE

Encls. of even No. & Date.

Copy forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director General, Agriculture (Research), Khyber Pakhtunkhwa, Peshawar.
3. Officer concerned.
4. PS to Secretary Agriculture Khyber Pakhtunkhwa, Peshawar.
5. Master file.

(Dr. Mir Ahmad Khan)
SECTION OFFICER-ESTT.

No. 9093-95 /Est/DGAR

Dated 22/7/2016

Copy of the above is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. The Senior Director Outreach, Agric. Research Khyber Pakhtunkhwa Peshawar.
3. The officer concerned.

For information and necessary action.

Administrative Officer (Estt)
Directorate General
- Agric. Research
Khyber Pakhtunkhwa
Peshawar.

ATTESTED

CC to A.S. & P.R.
- SD. atms
3. officer and

22/7/16



GOVERNMENT OF KHYBER PAKHTUNKHWA
 AGRICULTURE LIVESTOCK & COOPERATIVE
 DEPARTMENT

Dated Peshawar, the April 7, 2017

Director
 Peshawar
 Date: 7/7/17

NOTIFICATION.

NO. SOE (AD)/7-66/07-08/RW:-

in continuation to this department letter of even number dated 18.07.2016, the competent authority is pleased to accord sanction to the grant of extension of 60 days ex-Pakistan Leave (without pay) in respect of Shaista Masroor Assistant Director Outreach (BS-17), Directorate Outreach, Agriculture Research, Khyber Pakhtunkhwa Peshawar, with effect from 01.12.2016.

2. This department has no objection on her proceeding abroad.

Sd:-
 SECRETARY AGRICULTURE

Endst. of even No. & Date.

Copy forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director General, Agriculture (Research), Khyber Pakhtunkhwa, Peshawar.
3. The Assistant Director, Immigration and passport Office, Peshawar and Islamabad.
4. Officer concerned.
5. PS to Secretary Agriculture, Khyber Pakhtunkhwa, Peshawar.
6. Master file.

Sadaqat Ullah
 07/07/17
 (SADAQAT ULLAH)
 SECTION OFFICER-ESTT:

DCIAR

2540-49/Estt/DGAR

Dated *13/04/2017*

Copy of the above is forwarded to:-

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Senior Director Outreach, Agricultural Research Khyber Pakhtunkhwa Peshawar.
3. The officer concerned.

for information and necessary action.

D. Ahmad
 ADMN OFFICER (ESTT)
 Directorate General

ATTESTED

[Signature]

The Secretary

Agriculture, Livestock and Cooperative Department

Government of Khyber Pakhtunkhwa

Peshawar.

Subject: Leave Extension

Reference to your office notification letter No: SOE(AD)/7-66/07-08/RW dated April 7, 2017 under the revised Leave Rules 1981; I was granted a leave (without pay) w.e.f 01-12-2016.

With due respect and thankfulness, it is to state that your gracious highness had granted me the leaves earlier as well for almost two years on the account of my husband's job and family issues. Unfortunately, since the last year I am facing serious health issues regarding my pregnancy, thyroic malfunctioning and premature delivery. Now I have also been a severe victim of post-partum depression connected with my previous illness and physical conditions. I have been remained under regular medications and blood analysis this year but due to my present test reports and physical examination my concerned physician strongly recommended to continue these treatments for full recovery and health fitness for about further six months.

It is therefore requested that my leave period may kindly be extended to six more months due to the above said genuine reasons so that I can be fully recovered from the illness I am suffering from. I assure you that I will re-continue my job as soon as I will recover enough. I shall be highly obliged for this kind act.

The medical certificate is attached herewith for information and further necessary action.

yours sincerely,

Shaišta Masroor

ATTESTED

[Signature]

To
The Section Officer Establishment
Agriculture Department Civil Secretariate
Khyber Pakhtunkhwa Peshawar.

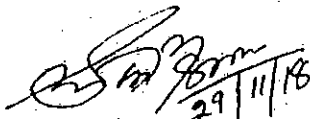
E - 12

Subject: Absentee Notice

Kindly refer to your letter No.SOE(AD)7-28/06 dated 23/11/2018 on the subject noted above and to request your goodself that I have Visa issuance problem of my newborn in Canada and am stucked therein severely and therefore unable to attend the office within 15 days.

I will submit my arrival report to the Department for duty as and when visa issue is resolved. This I am giving on the surety bond which may kindly be accepted please.

Regards


29/11/18

Shaista Masroor

Deputy Director Outreach,

Agriculture Research Khyber Pakhtunkhaw Peshawar.

ATTESTED



Charge sheet
Absent



GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

Dated Peshawar, the 26/12/2019

03/01/2020

ORDER

NO. SOE(AD)7-66/07-08/Shaista Masroor, WHEREAS, Ms. Shaista Masroor, Deputy Director Outreach (BPS-18), O/p Directorate of Outreach, Agriculture Research, Khyber Pakhtunkhwa Peshawar remained absent from duty w.e.f 01.07.2018 without any information/permission of the Competent Authority.

AND WHEREAS, the officer was served with an absentee notice on her mailing address to join duties within 15-days as well as publishing absentee notices in two leading newspapers. The officer failed to comply with the directions to join duty in stipulated time.

AND WHEREAS, the procedure envisaged in Rule-9 of the E&D Rules-2011 was followed and observing all-codal formalities.

AND now the Competent Authority in terms of Rule 2(1)(c)(f) of Efficiency & Discipline Rules, 2011 read with Rules, (4)(c)(a) of Appointment, Promotion & Transfer Rules, 1989, after having considered the charges, evidence on record has been pleased to impose the major penalty of "Removal From Service" upon Ms. Shaista Masroor, Deputy Director Outreach (BPS-18) under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficient & Discipline) Rules, 2011 with immediate effect. Her willful absence from 01.07.2018 till date is treated as unauthorized absence from duty.

Sd/xx
SECRETARY AGRICULTURE

ATTESTED

Dated 03/01/2020

No 146-48 /ESI/DGIAR

Copy of the above is forwarded to: -

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Senior Director Outreach, Agriculture Research Khyber Pakhtunkhwa Peshawar
3. Ms. Shaista Masroor, Deputy Director Outreach.

For information and necessary action.



DIRECTORATE GENERAL AGRICULTURE RESEARCH

KHYBER PAKHTUNKHWA, 25130, PESHAWAR

☎ 091-9221271 web: www.agriresearch.kp.gov.pk ☎ 091-9221270

E-mail: dgragriresearch@gmail.com



No 4268 /Estt/DGAR

Dated the Peshawar 17/03/2020

To

Mrs. Shaista Masroor,
Ex-Deputy Director Outreach
H#2079 Mohallah Sheikh-ul-Islam
Area Gunj, Peshawar

(Handwritten marks)
G-14

Subject: COPY OF TERMINATION LETTER.

Reference to your application No Nil dated 03-03-2020 on the above noted subject.

In this connection, it is stated that the termination notification has already been sent to you through office of the Senior Director Outreach, Agriculture Research Khyber Pakhtunkhwa Peshawar vide this office endorsement No.146-48/Estt/DGAR; dated 03-01-2020. However, a copy of the termination notification is sent herewith for your information.

Encl: As Above.

(Handwritten signature)
DIRECTOR GENERAL

ATTESTED

(Handwritten signature)

To,

The Chief Secretary to the Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER OF THE SECRETARY AGRICULTURE DEPARTMENT BEARING NO.SOE(AD)7-66/7-8 DATED 26.12.2019, RECEIVED BY THE APPELLANT ON 19.03.2020 BY POST, THROUGH THE DIRECTOR GENERAL, AGRICULTURE RESEARCH KHYBER PAKHTUNKHWA, PESHAWAR UNDER HIS NO.4269 DATED 17.03.2020, WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE WITHOUT ANY LAWFUL AUTHORITY.

Sir,

The Appellant respectfully submits as under:-

1. That the Appellant is deeply shocked on her removal from service through impugned Order of the Secretary, Agriculture, Department dated 26.12.2019 (copy of the Impugned Order and covering letter of the Director, Agriculture are Annexed A and B).
 2. That before issuing the Impugned Order the Appellant was not heard by the Secretary, Agriculture.
 3. That due to unavoidable circumstances the Appellant applied for extension of her leave but to no avail (copy of application annexed as-C).
 4. That the Revised Leave Rules 1981, and subsequent orders of the Government, regarding extra ordinary leave without pay whereby a Government servant can avail five years leave without pay after every spell of 10 years service, were not taken into consideration by the Secretary, Agriculture Department, therefore, issuance of Impugned Order by the Secretary is an act of violation of rules.
 5. That the Chief Minister is the Competent Authority in case of the Government Servant from BPS-18 and above. It is an enigma why has the Impugned Order not been issued by the Competent Authority (Chief Minister)?
 6. That the Appellant joined the service on 19.01.2005 and till the issuance of Impugned Order she had rendered about 15 years service with good record. Question Arises whether there had not been sufficient leave at her credit to extend her leave as per Rules in vogue?
 7. That the Office of the Appellant had received the application of the Appellant for extension of her leave without pay but the same was not given due and proper attention by the Administrative Department. So in this context the issuance of Impugned Order to cut the throat of innocent Appellant is the worst example of injustice. Therefore, the Impugned Order is not a lawful Order. It is illegal, void, arbitrary, malafide and without lawful authority.
 8. That the Impugned Order dated 26.12.2019 has been passed in colorful exercise of power for collateral purposes without contemplated by law and as such of no consequences what so ever being malafide out and out.
- That the Impugned Order is not a legal and valid order, it is discretionary, notional, whimsical, capricious and not in accordance with law.

ATTESTED

9

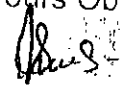
- 10. That it was in the notice of the Department that the Appellant was in abroad yet she was removed from services without hearing her. Moreover, rejection of her application for extension of her leave was not justified under the Leave Rules.
- 11. That the leave is the part of service. Had it not been a part of service, it would have not included in the service and the Rules had not been framed. Therefore, in the presence of Rules the rejection of Appellant's application for extension of leave was unjust and unfair.
- 12. Question arises whether the Rules and Regulations are made to streamline the Administration or to pierce the chests of the employees?
- 13. Whether in this case the leave Rules have been followed in letters and spirit or not?
- 14. That the Appellant had joined the service on 19.01.2005 and she was entitled to avail leave as per Leave Rules. But ignoring all the Rules and without hearing the Appellant she has been removed from service. Therefore, in this scenario the Impugned Order cannot be legal and valid Order. It is nullity in the eye of law.
- 15. Question arises whether the Extra-Ordinary Leave without pay availed by the Appellant had put any burden on the Government Treasury and had it been a severe loss to the Government incase the leave had been extended?
- 16. In the light of the above facts and figures, the Impugned Order dated 26.12.2019 needs repealing.

It is humbly prayed that repealing the Impugned Order, dated 26.12.2019, the Appellant may kindly be honourably reinstated from the date she had been removed from service so that the right could be might.

Thanks,

Dated: 31.03.2020

Yours Obediently,



Shaista Masroor
 Ex-Deputy Director (Out Reach),
 Office of the Director General
 Agriculture Research, KPK,
 Peshawar.
 CONTACT NO: 03219043590
 — 11 — 11 0316-6889955
 Address: House No.....
 Mohallah Sheikhul Islam,
 Ilaaqa Gunj, Peshawar City.

ATTESTED

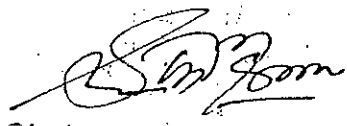


e/c

Copy of the above alongwith document to:-

- ← 1. The Honourable Chief Minister, Khyber Pakhtunkhwa, with humble submission that this appeal may kindly be given proper perusal for issuance necessary orders.
- ← 2. The Secretary, to the Government of Khyber Pakhtunkhwa, Agriculture Department, Civil Secretariat, Peshawar.
- 3. The Director General, Agriculture Research, Peshawar.

2486
 1/3/20
 27/6/2020



VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2020

Shaista Mansoor

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Dept

(RESPONDENT)
(DEFENDANT)

I/We *Shaista Mansoor*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2020

[Signature]

CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

MIR ZAMAN SAFI

&

AFRASIAB KHAN WAZIR
ADVOCATES

OFFICE:
Flat No.4, 2nd Floor, Juma Khan
Plaza, near FATA Secretariat,
Warsak Road, Peshawar.
Mobile No.0345-9383141

[Signature]
[Signature]

C

(0)

**BEFORE THE LEARNED SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 8644-P/2020

Mst. Shaista Masroor ex: Dy. Director Out Reach

..... **Appellant**

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar

..... **Respondents**

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4.	Absent from duty letter	A ₁ & A ₂	9-10
5.	Absentee Notice	B	11-13
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**BEFORE THE LEARNED SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 8644-P/2020

Mst. Shaista Masroor ex: Dy. Director Out Reach

..... **Appellant**

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar

..... **Respondents**

SUBJECT: REPLY ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

Preliminary Objections

- ✓ That the appellant has no cause of action to file the instant appeal.
- ✓ That the appellant has got no prima facie to file the instant appeal.
- ✓ That the instant appeal is badly time barred.
- ✓ That the appellant wishes to waste the precious time of this Hon`ble Tribunal for filing the instant appeal.
- ✓ That the appellant has not come to this Honorable Tribunal with clean hands.
- ✓ That the instant appeal is not maintainable in its present form and liable to be dismissed with cost.
- ✓ That the appellant has no locus standi to file the instant appeal.
- ✓ That the appellant is deliberately concealing the important facts from this Honorable Tribunal.

ON FACTS: -

- Para-1 Pertains to appellant record.
- Para-2 Not admitted. She was proceeded to Canada along with her husband in order to apply for Canadian citizenship, for which three years continuous stay at Canada is mandatory. Therefore, the appellant was using delaying tactics in order to complete her three years which were the core requirement for Canadian Citizenship.
- Para-3 Pertains to record. However, after 610 days leave, the appellant again applied for leave extension, which was regretted by the competent authority.
- Para-4 Not admitted. The appellant submitted application highlighting her health issues just to avail extension in order to complete her three years which are mandatory for a couple/individual after applying for Canadian Citizenship. Furthermore, the appellant also did not attach any medical documents (**duly attested by the Embassy of CANADA**) to her appeal, if so the same may be reproduced before this Hon`ble Tribunal.
- Para-5 Not admitted. Hence, denied. The appellant has failed to join her duties after expiry of her leave. It is also worthwhile to mention here that after expiry of granted leave, the appellant concerned did not furnish charge assumption report and still absent from her duty. The Director General Agriculture Research vide letter No. 14259/Estt/DGAR, dated 8.11.2018 endorsed memo No.

620/SDOR, dated 6.11.2018 to the Competent Authority with the request that appropriate action may be initiated against the officer concerned under Govt. of Khyber Pakhtunkhwa E&D Rules, 2011 for her continuous absenteeism. (Copies of letters are attached as Annexure A1 & A2)

Para-6 Not admitted. As mentioned in above paras the appellant must submit medical documents **duly attested by the Embassy of CANADA**. It is also pertinent to mention here that brother of the appellant has submitted a surety bond (Annexure B) on behalf of her sister that she (the appellant) will arrive as soon as possible. Since that appellant failed to submit arrival report for joining her duties after submission of undertaking by her brother, the Competent Authority initiated disciplinary action on account of absentees from duty without any information/permission of the Competent Authority. The Competent Authority after fulfillment of all codal formalities and in terms of Rule 2(l)(e)(f) of the Efficiency & Disciplinary Rules, 2011 imposes major penalty of **"Removal From Service"** on the appellant.

Para-7 No comments.

Para-8 That the appellant failed to comply with the directions to join duty in stipulated time. Hence while observing all codal formalities and following the procedure envisaged

in Rule-9 of the E&D Rules, 2011, the "**Removal From Service**" order was issued.

Para-9 With prior permission of this Hon'ble Court, necessary additional grounds and justifications will be provided at time of arguments.

GROUND: -

Para-A Not admitted, hence denied. As mentioned clearly in above para-8 the appellant failed to comply with the directions to join duty in stipulated time. Hence, while observing all codal formalities and following the procedure envisaged in Rule-9 of the E&D Rules, 2011, the "**Removal From Service**" order was issued.

Para-B Not admitted. As mentioned in above paras, all codal formalities and procedures envisaged in Rule-9 of the E&D Rules, 2011 was observed and followed. Hence, the appellant was treated according to Rules and the question of violation of Article 4 and 25 of the Constitution of Islamic Republic of Pakistan does not arise.

Para-C As mentioned above in para 4 & 6, appellant must have to submit medical documents **duly attested by the Embassy of CANADA.**

Para-D No comments up to the extent that the appellant did not applied for leave on medical grounds neither she submitted medical documents which were **duly attested by the Embassy of CANADA** (if so, she may please

produce before this Hon`ble Tribunal). The appellant only applied for ex. Pakistan leave which was granted and extended as per Rules in Vogue.

Para-E Not admitted. The appellant was treated as per established Government Laws & Rules and was never discriminated. The removal from service order was issued according to law and rules in vogue.

Para-F That the appellant was informed through absentee notice served upon her through her brother and her brother submitted undertaking on Surety Bond, but the appellant failed to comply.

Para-G As mentioned in above paras, the appellant was served upon absentee notice for her unauthorized willful absenteeism and directed her to join her duties within 15 days (for which her brother submitted surety bond), but the appellant failed to comply with the directions to join duty in stipulated time and deliberately remained absent from the duty.

Para-H That the appellant was properly informed through a notice vide No. SOE(AD)7-28/06, dated 23.11.2018. Also absentee notice was published in two leading newspapers (**Annexure C**).

Para-I With prior permission of this Hon`ble Court, necessary additional grounds and justifications will be provided at time of arguments.

It is therefore, humbly prayed that on acceptance of the above para-wise comments/reply, the instant appeal of the appellant may kindly be dismissed with cost.

- Respondent No. 1

Chief Secretary
Govt. of Khyber Pakhtunkhwa,
Peshawar

Respondent No. 2

Secretary
Agriculture Livestock &
Cooperative Department, Govt.
of Khyber Pakhtunkhwa,
Peshawar

Respondent No. 3

Director General
Agriculture Research
Khyber Pakhtunkhwa

**BEFORE THE LEARNED SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 8644-P/2020

Mst. Shaista Masroor ex: Dy. Director Out Reach

..... **Appellant**

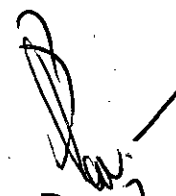
Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar

..... **Respondents**

AFFIDAVIT

I, Touheed Iqbal, Assistant Director, Directorate General Agric. Research, Peshawar, do hereby solemnly affirms that the contents of para-wise reply/comments are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Hon`ble Tribunal.



Deponent

CNIC# 17301 0727541-9

Mob# 0345 9180394

**BEFORE THE LEARNED SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 8644-P/2020

Mst. Shaista Masroor ex: Dy. Director Out Reach

..... **Appellant**

Versus

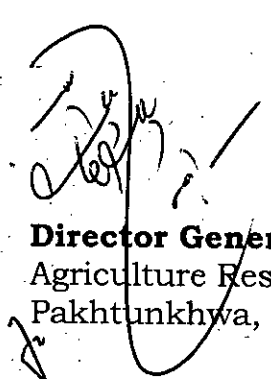
1. Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Agricultural Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Director General: Agriculture Research, Peshawar

..... **Respondents**

AUTHORITY

Mr. Touheed Iqbal (Asstt: Director, HQ) is hereby authorized to submit reply/comments and appear on behalf of respondents before the Hon`ble Tribunal in the above service appeal and also pursue the case on each and every date.

He is also authorized to submit all relevant documents in connection with the above service appeal.


Director General
Agriculture Research Khyber
Pakhtunkhwa, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE GENERAL AGRICULTURAL RESEARCH

Office: at Agricultural University Peshawar

☎ 091-9221271 web: www.agrires.kp.gov.pk ☎ 091-9221270

E-mail: dgragriresearch@gmail.com

No. 14259 /Estt/DGAR

Dated Peshawar the 8/11 /2018

The Section Officer (Estt)
 Government of Khyber Pakhtunkhwa,
 Agriculture Livestock & Cooperative Department
 Peshawar.

Subject: ABSENT FROM DUTY.

It is submitted that Miss. Shaista Masroor, Deputy Director Outreach, Directorate of Outreach, Agricultural Research Khyber Pakhtunkhwa Peshawar has failed to join her duty after expiry of her leave i.e. 30.07.2018 granted vide notification No. SOE (AD)/7-66/07-08/RW, dated 07-04-2017. After availing of 610 days leave the officer concerned submitted extension for another leave but the competent authority rejected her application.

It is worth to mention that despite of expiry of granted leave, the officer concerned is still absent from her duty and consequently charge assumption report has not yet been furnished by her:

In this regard the enclosed memo No. 620/SDOR, dated 06-11-2018 of the Senior Director Outreach, Agricultural Research Khyber Pakhtunkhwa Peshawar has been sent to this office for favour of further necessary action.

It is therefore, requested that appropriate action under Govt. of Khyber Pakhtunkhwa E&D Rules, 2011 may kindly be initiated against the officer concerned for her continuous absent from duty w.e.f. 01-07-2018 to date.

Encl: As Above.


 DIRECTOR GENERAL

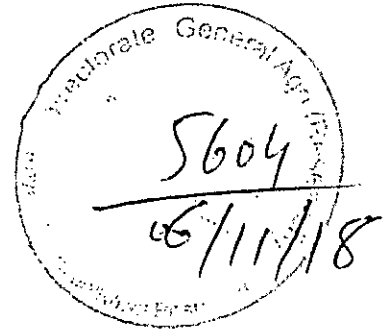


Government of Khyber Pakhtunkhwa
Directorate Of Outreach
 Agricultural Research, The University of Agriculture Peshawar
 Ph#: 091-9221273 Fax #: 091-9216804
 email.sdor_ars@yahoo.com www.agrires.kp.gov.pk

No. 520 /SDOR
 Dated 06-11 /2018

The Director General
 Agricultural Research
 Khyber Pakhtunkhwa, Peshawar

Subject:- ABSENT FROM DUTY
 Memo:



Reference this office letter No. 548/SDOR dated 19-09-2018.

It is submitted that Miss Shaista Masoor, Deputy Director Outreach was granted extension of leave (without pay) w.e.f. 01-12-2016 to 03-07-2018 (610 days) by the competent authority vide notification No. SOE(AD)/7-66/07-08/RW dated 07-04-2017. After expiry of leave the officer concerned submitted another application for further extension of leave in your office without any information to this office which was forwarded to the quarter concerned for further action but the competent authority regretted her leave application.

This office has no information where about the officer concerned from 01-07-2018 till date. Therefore, it is once again requested that the case of the officer concerned may please be send to the competent authority to initiate proper action under the E&D Rules 2011.

SHARAF
 AOE

[Signature]
 Senior Director Outreach
 Agricultural Research
 Khyber Pakhtunkhwa, Peshawar

[Handwritten notes: Dismissed, Person, etc.]

[Handwritten notes: SOE with P. Reza]

[Handwritten signature and date: 6/11/18]

Annex - B

11

Charge Sheet



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE GENERAL AGRICULTURAL RESEARCH

Office: at Agricultural University Peshawar

☎091-9221271 web: www.agrires.kp.gov.pk ☎091-9221270

E-mail: dgragriresearch@gmail.com

No. 15399-15400 /Estt/DGAR

Dated Peshawar the 12/11/2018

The Section Officer (Estt)
Govt. Of Khyber Pakhtunkhwa,
Agric. Livestock & Cooperative Deptt.
Peshawar.

Subject: **ABSENTEE NOTICE.**

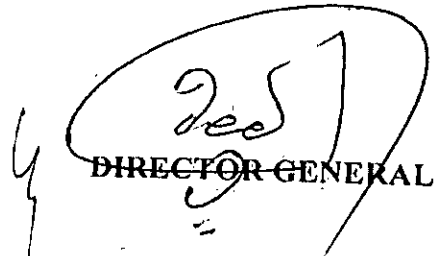
Enclosed please find herewith a letter received from Miss. Shaista Masroor, Deputy Director Outreach and requested that she has visa problem of her newborn in Canada due to which she is unable to attend the office within 15 days. A surety bond, filled by her brother named "Faizan Ali", Mobile No. 0334-9043760 is also attached with her request undertaking that she will return to join duty as soon as visa is issue to her newborn.

It is therefore submitted her request for further necessary order and the undersigned may also be advised /guided regarding the matter.

Encl: As Above.

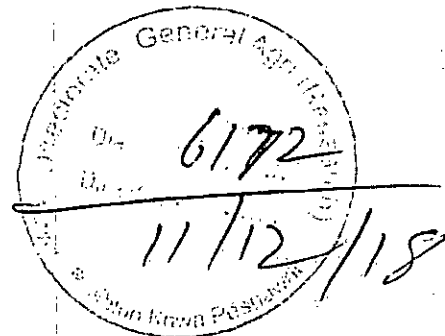
CC.

The Senior Director Outreach, Agriculture Research Khyber Pakhtunkhwa Peshawar for information.


DIRECTOR GENERAL

12

To
The Section Officer Establishment
Agriculture Department Civil Secretariate
Khyber Pakhtunkhwa Peshawar.



Subject: Absentee Notice

Kindly refer to your letter No.SOE(AD)7-28/06 dated 23/11/2018 on the subject noted above and to request your goodself that I have Visa issuance problem of my newborn in Canada and am stucked therein severely and therefore unable to attend the office within 15 days.

I will submit my arrival report to the Department for duty as and when visa issue is resolved. This I am giving on the surety bond which may kindly be accepted please.

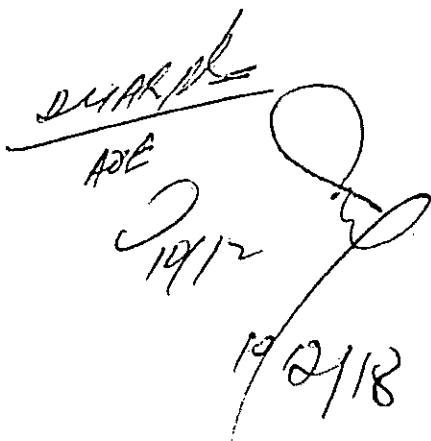
Regards


Shaista Masroor

Deputy Director Outreach,
Agriculture Research Khyber Pakhtunkhaw Peshawar.

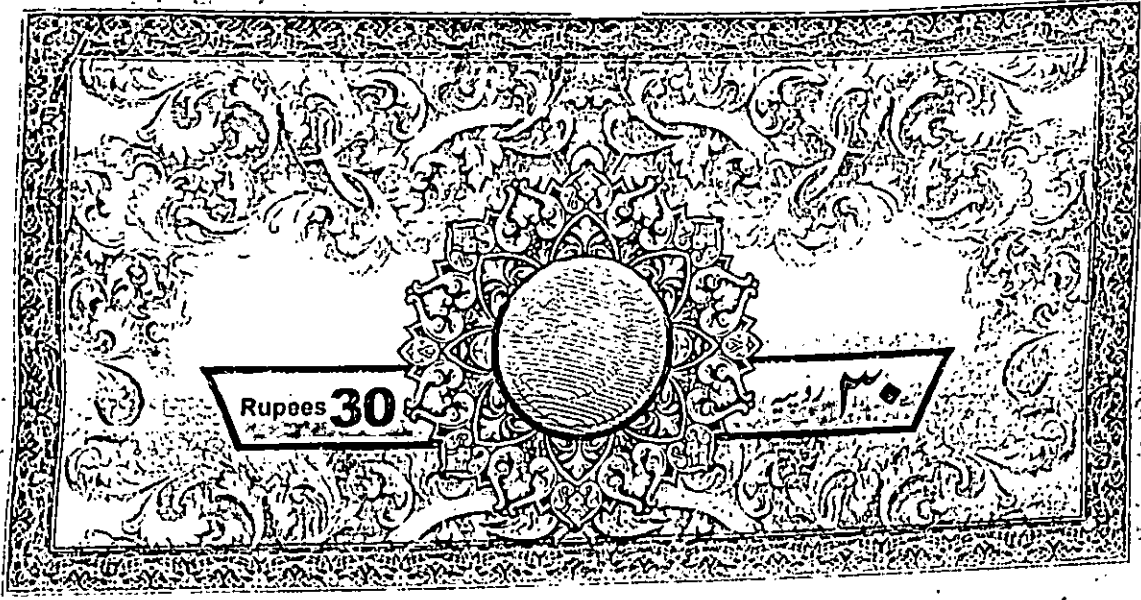
Copy to:

- 1. PS to Secretary Agriculture
- 2. DGAR
- 3. DG Outreach



30E
D.

0245161



Undertaking
Absence Notice

Kindly refer to your letter No. SOE(AD)7-28/06

dt 23-11-2018 regarding absence Notice to my sister.
Sir, I give you this Surety Bond that when the
Vise Issues of my sister are resolved, she will
Submit arrival report for duty as soon as
possible.

My request may be considered very
humbly and no action till arrival of my sister
from abroad may be taken please.

Signature 7/12/18

Faizan Ali,

Brother of Shaista Masroor,
DD Outreach, Agr. Research KP.

Mob# 0334 9043760

Ad: Afghan Colony Peshawar City.

CC:-
Section Officer (E) Agr. Dist. KP

Interviews will be held on 24/7/2019 at 10:30 AM at LRH MTI
Peshawar.

**MEDICAL DIRECTOR
LRH MTI, Peshawar**

حکومت خیبر پختونخواہ
محکمہ زراعت امور حیوانات و امداد باہمی

نوٹس غیر حاضری

ہر گاہ آپ مس شائستہ سرور ولد محمد عنایت اللہ، ڈپٹی ڈائریکٹر آڈٹ ریج (BS-18) ایگزیکٹو
ریسرچ خیبر پختونخواہ پشاور، اپنی جائے ڈیوٹی سے مورخہ 01.07.2013 سے بغیر کسی منظوری سے مسلسل
غیر حاضر ہو۔ آپ کو بذریعہ چھٹی نمبر 7-28/06 SOE(AD) مورخہ 23.11.2018 مطلع کیا گیا تھا کہ
اپنی ڈیوٹی کی جگہ پر حاضری کریں لیکن آپ نے سرکاری احکام پر عمل درآمد نہیں کیا۔ آپ کو بذریعہ اخباری
نوٹس ہذا مطلع کیا جاتا ہے کہ اس نوٹس کی اشاعت کے پھر وہ یوم کے اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور
اپنی غیر حاضری کی معقول وجوہات بیان کریں بصورت دیگر آپ کے خلاف نظم و ضبط کے قانون مجریہ 2011
کی ذیلی سشن 9 کے تحت انضامی کارروائی عمل میں لائے جائے گی۔ جس کے نتیجے میں آپ کو سرکاری نوکری سے
برخواست بھی کیا جاسکتا ہے۔

سیکشن آفیسر (اسٹیبلیشمنٹ)

محکمہ زراعت امور حیوانات و امداد باہمی

حکومت خیبر پختونخواہ پشاور

INF(P)-3121/19

پولیس کی پیش رفت کے بارے میں

ہر گاہ آپ مس شائستہ مسرور ولد محمد عنایت اہل عدالت کا درجہ 1/7/18 سے لاہور پولیس کے ریجنل انسپکٹر پختونخوا پشاور اپنی جائے ڈیوٹی سے مورخہ 23/11/2018 کو بذریعہ جہشی نمبر SOE(AD)7-28/06 مورخہ 23/11/2018 مطلع کیا گیا تھا کہ اپنی ڈیوٹی کی جگہ پر حاضری کریں لیکن آپ نے سرکاری احکام پر عملدرآمد نہیں کیا آپ کو بذریعہ اخبار نوٹس ہذا مطلع کیا جاتا ہے کہ اس نوٹس کی اشاعت کے پندرہ یوم کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور اپنی غیر حاضری کی معقول وجوہات بیان کریں بصورت دیگر آپ کے خلاف نظم و ضبط کے قانون مجریہ 2011 کی ذیلی شق 9 تحت انضباطی کارروائی عمل میں لائی جائے گی جس کے نتیجے میں آپ کو سرکاری نوکری برخواست بھی کیا جاسکتا ہے۔

سیکشن آفیسر (اسٹیٹس مینٹ)

محکمہ زراعت امور حیوانات و امداد باہمی

حکومت خیبر پختونخوا پشاور

3121/19 www.khyberpakhtunkhwa.gov.pk

CORRUPTION & DRUGS

نوٹس غیر حاضری

ہر گاہ آپ مس شائستہ مسرور ولد محمد عنایت اللہ، ڈپٹی ڈائریکٹر آؤٹ ریچ (BS-18) ایگر کلچرل ریسرچ خیبر پختونخواہ پشاور اپنی ڈیوٹی سے مورخہ (01-07-2018) سے بغیر کسی منظوری سے مسلسل غیر حاضر ہو۔ آپ کو بذریعہ چھٹی نمبر SOE(AD7-28/06) مورخہ 23.11.2018 مطلع کیا گیا تھا کہ اپنی ڈیوٹی کی جگہ پر حاضری کریں لیکن آپ نے سرکاری احکام پر عمل درآمد نہیں کیا۔ آپ کو بذریعہ اخباری نوٹس ہذا مطلع کیا جاتا ہے کہ اس نوٹس کی اشاعت کے پندرہ یوم کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور اپنی غیر حاضری کی معقول وجوہات بیان کریں بصورت دیگر آپ کے خلاف نظم و ضبط کہ قانون مجریہ 2011 کی ذیلی شق 9 کہ تحت انضباطی کارروائی عمل میں لائے جائے گی۔ جس کے نتیجے میں آپ کو سرکاری نوکری سے برخاست کیا جا سکتا ہے۔

سیکشن آفیسر (اسٹیبلشمنٹ)

محکمہ زراعت، امور حیوانات و امداد باہمی

حکومت خیبر پختونخوا، پشاور