


FORM OF ORDER SHEET

Court of _____

Appeal No. 2038/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2023	<p>The appeal of Mst. Irshad Bibi resubmitted today by Mr. Afrasiab Khan Wazir Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Irshad Bibi Ex-PST.GGPS Changmalai District SW received today i.e on 26.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal is unattested.
- 2- Page nos. 6 & 7 of the appeal are illegible be replaced by legible/better one.

No. 3305 /S.T,

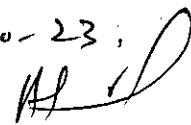
Dt. 27/9 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Afrasiab Khan Wazir Adv.
High Court at Peshawar

R/ Shaukat

- 1) Departmental appeal is attested.
- 2) Page Nos. 6, 7 are replaced by better copy
Hence re-submitted today 11-10-23,


BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

APPEAL No. 2038 /2023

MST IRSHAD BIBI

...VERSUS...

EDUCATION DEPARTMENT

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	1-4
2.	Affidavit	4
3.	Condonation of delay application	5
4.	Appointment orders dated 02.03.2007 & re-appointment dated 13.07.2020 & charge report dated 14.07.2020	A	6-8
5.	Applications & medical receipts	B & C	9-24
6.	Impugned order dated 21.02.2023 and communicate via whatsapp screenshot on dated 15.03.2023	D & E	25-26
7.	Representation	F	27
8.	Vakalatnama	28

APPELLANT

THROUGH:

AFRASIAB KHAN WAZIR
ADVOCATE HIGH COURT

Office Address:

*Room No.6 Afridi Tower,
Government College Chowk,
Faqirabad, Peshawar.*

© 0312-9888752

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

APPEAL NO. 2038/2023.

Mst. Irshad Bibi, Ex-PST (BPS-12)
GGPS Chagmalai, District South Waziristan.

.....APPELLANT.

...VERSUS..

- 1- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The district Education Officer (F), South Waziristan.
- 3- The District Account Officer, South Waziristan.

.....RESPONDENTS.

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED ORDER DATED 21.02.2023 COMMUNICATED TO APPELLANT'S BROTHER THROUGH WHATSAPP ON DATED 15.03.2023 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE IS AWARDED TO THE APPELLANT AND AGAINST NO ACTION TAKEN ON DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATORY PERIOD OF NINTY DAYS.

PRAYER:

That on acceptance of this instant service appeal the impugned order dated 21.02.2023 communicated to appellants brother through whatsapp on dated 15.03.2023 may very kindly be set aside and the respondents be directed to reinstate the appellant with all back benefits. Any other remedy which August Tribunal deems fit that may also be awarded in favor of the appellant.

RESPECTFULLY SHEWETH:

ON FACTS:

Brief facts of the appeal are as following:

- 1- That the appellant was an employee of education department served/appointed as PTC 02.03.2007 and later she was re-appointed on regular basis as PST (BPS-12) on dated 13.07.2020, That after reappointment on regular as

PST she assumed charge in school by submitting charge report in the very school on dated 14.07.2020.

Copies of the appointment orders dated 02.03.2007 & re-appointment dated 13.07.2020 & charge report dated 14.07.2020 are attached as annexure.....A.

2- That the appellant after assuming charge in the school, she started performing her duties enthusiastically & passionately because she was interested in educating the girls of South Waziristan deprived in every discipline being war torn area in KP.

3- That the appellant during the course of performance of her duties in south Waziristan she suffered from **Major Depression Disorder** (fear of death, suicidal thoughts, sleeplessness, and many others issues) and on the advice of the doctor in DHQ hospital Dera Ismail Khan she moved various leave applications to headmistress of her school for leave of 2 months frequently.

Copies of the leave applications & medical receipts are attached as annexure..... B & C.

4- That the appellant during that period received salaries till January 2023 and was very certain and composed about acceptance of her leave application which wrote to the head of the school.

5- That astonishingly the respondent had issued impugned order dated 21.02.2023 communicated to the appellant's brother via whatsapp on dated 15.03.2023 whereby she was awarded major penalty of removal from service without looking to mental health of the appellant and the applications & medical receipts which she sent to the head of the school not to mark her absent from duty.

Copy of the impugned order dated 21.02.2023 and whatsapp screenshot on dated 15.03.2023 are attached as annexure.....D & E.

6- That the impugned further engraved mental health condition of the appellant and the appellant feeling aggrieved from the impugned order dated 21.02.2023 communicated on whatsapp dated 15.03.2023 moved representation to the appellate authority which is still pending.

Copy of the representation is attached as annexure.....F.

7- That the appellant further feeling aggrieved and having no other alternate and efficacious remedy but to file this instant service appeal on the following grounds inter alia.

ON GROUNDS:

- A- That the issuance of impugned order dated 21.02.2023 communicated on whatsapp dated 15.03.2023 (to the appellant's brother) by the respondents is against law, rules. Hence liable to be set aside.
- B- That the appellant has not been treated in accordance with law and violated article 4 and 24 of the constitution of Islamic republic of Pakistan 1973.
- C- That the action of the respondents is arbitrary in nature and based on malide which is against the norms of natural justice. Hence liable to be set aside.
- D- That no show cause notice, statement of allegation and charge sheet has been issued to the appellant by the respondent.
- E- That the appellant had already moved leave applications along with medical receipts to the respondents which are without intimation of rejection to the appellant are not considered neither appellant has been informed about rejection of leave application on medical grounds.
- F- That no regular inquiry has been conducted by the respondents into the matter before issuance of impugned order dated 21.02.2023 communicated on 15.03.2023.
- G- That no chance of personal has been provided to the appellant.
- H- That the illegal and unlawful action of the respondents further aggravated the appellant mental condition causing anxiety and depression which was mostly recovered.
- I- That the appellant seeks permission to advance any other grounds at the time of regular hearing.

It is therefore, most humbly prayed that the appeal of the appellant may very graciously accepted.

APPELLANT


IRSHAD BIBI

THROUGH:


Afrasida Khan Wazir
Advocate High Court

Dated: ___/___/2023

Certificate:

It is certified that no earlier appeal has been filed between the parties on the same subject matter before this August Tribunal.


Deponent

Affidavit:

I, Mr. Irshad Bibi D/O Noor Muhammad Khan permanent resident of Ladha kanigoram Tehsil Ladha district South Waziristan, do hereby solemnly affirm and declare that the contents of this appeal are true and correct to best of knowledge and belief and nothing has been concealed from this Honorable tribunal.


Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

C.M No. _____/2023
In Appeal No. _____/2023.

Mst Irshad Bibi Vs Education Department

APPLICATION FOR CONDONATION OF DELAY IN THE
AFORMENTIONED APPEAL.

Respectfully sheweth:

- 1- That the abovementioned appeal is pending adjudication before this August Tribunal and is not yet fixed for hearing.
- 2- That the appellant have filed the aforementioned appeal against the impugned order dated 21.02.2023 communicated on whatsapp dated 15.03.2023 whereby the appellant is awarded major penalty of removal from service.
- 3- That no codal formalities have been adopted by the respondents in usurping the job of the appellant.
- 4- That the appellant case is fit-on merit and there are various apex court judgment wherein it is stated that the case to be decided on merit rather looking into technicalities, while on of them is 2002 PLC (CS) 1388.
- 5- That the appellant valuable rights are attached to this appeal and if not decided not merit it will cause irreparable loss to the appellant.

it is therefore, most humbly prayed that the condonation of delay application of the appellant may very kindly be accepted.

APPELLANT

THROUGH:

Afrasiab Khan Wazir
Advocate High Court.

A-6

OFFICE OF THE AGENCY EDUCATION OFFICER, SOUTH WAZIRISTAN AGENCY AT TANK

APPOINTMENT ORDER

Consequent upon the approval by the Departmental Selection Committee, the following Female candidates of Sarwaki Sub Division, South Waziristan Agency are hereby appointed as PTC purely on temporary basis in BPS-7 plus usual allowances as per approved PC-1 for the project period / availability of funds with effect from the date of their taking over charge in the Schools noted against each.

No.	Name with Father's Name	Name of School where appointed	Remarks
01	Safia Rana D/o Khan Faraz	GFCGS Zeshan Kot Babarkai Wam Bader Sarwaki	Against newly created post
02	Brechna D/o Mushko-Alam	GFCGS Zeshan Kot Babarkai Wam Bader Sarwaki	Against newly created post
03	Shazia Rasool D/o Itasool Khan	GFCGS Jalal Khan Korona Barwand Sarwaki	Against newly created post
04	Zarina Khan D/o Akbar Jan	GFCGS Dilawar Kalai Maulay Khan Sarwaki Sarwaki	Against newly created post
05	Niaz Begum D/o Akbar Khan	GFCGS Jalal Khan Korona Barwand Sarwaki	Against newly created post
06	Iqshad Bibi D/o Khur Mohammedi	GFCGS Dilawar Kalai Maulay Khan Sarwaki Sarwaki	Against newly created post

TERMS AND CONDITIONS

1. Charge sheet should be submitted to all concerned.
2. The appointments of the candidates are being made purely on temporary basis and liable to termination at any time without assigning any reason, if they wish to continue in the post they should give their notice in writing for one month's pay.
3. Their medical expenses will not be drawn unless the same are from the institutions concerned are verified.
4. TADA is not allowed.
5. They should produce Health and Age Certificate from the Agency Surgeon concerned.
6. They should not be handed over charge of the post if they are below 18 years and above 40 years.
7. The pay scales and services Rules would be subject to revision in accordance with the orders to be passed by the Government of NWFP time to time or in accordance with the approved PC-1.
8. If they failed to report of their arrival within 15 days, their appointment orders will be treated as cancelled.

Agency Education Officer
South Waziristan Agency, Tank.

Order No. 117-4 / Dated Tank the 27/3/2007.
Copy of the above is forwarded to the:-

1. Director of Education, FATA, NWFP, Peshawar.
2. Political Agent, South Waziristan Agency at Tank.
3. Agency Accounts Officer, S.W. Agency at Tank.
4. Assistant Agency Education Officer (F) concerned.
5. Pay Clerk local office.
6. Candidates concerned.

Agency Education Officer
South Waziristan Agency, Tank.

Handwritten signature and stamp: "ATTSTED"

6

BETTER COPY
OFFICE OF THE AGENCY/EDUCATION OFFICER SOUTH WAZIRISTAN AGENCY
AT TANK

APPOINTMENT ORDER

Consequent upon the approval by the departmental selection committee the following female candidates of Sarwakai sub division south Waziristan agency or hereby appointed as PTC purely on temporary basis in BPS-7 plus usual allowances as per approved PC-1 for the project period/availability of funds with effect from the date of their taking over charge in the schools noted against each.

Serial no	Name with father name	Name of school where appointed	Remarks
1	Safia rana D/O khan Faraz	GFCS zeshar Kot Babarkai wam bader sarwakai	Against newly created post.
2	Breshna D/O Mushk e alam	---	---
3	Shazia Rasool D/O Rasool Khan	---	---
4	Zarina Khan	---	---
5	Niaz begum	---	---
6	Irshad Bibi D/O Noor Muhammad	---	---

Terms and Conditions

- 1- Charge report should be submitted to all concerned.
- 2- The appointment is purely on temporary basis and liable to termination at any time without assigning any reason.
- 3- If they wish to resign from the post they should give one month notice or forfeit one month pay forthwith.
- 4- Tada are not allowed.
- 5- They should produce health and age certificate from the agency surgeon concerned.
- 6- They should not be handed over the charge of the post if they are below 18 years and above 40 years.
- 7- The pay scale and service rule would be subject to revision in accordance with the order to be passed by the government of NWFP time to time or in accordance with the approved PC1.
- 8- If the failed to report of their arrival within 15 days their appointment orders will be treated as cancelled.

Agency Education Officer
South Waziristan Agency Tank.

Endst no 1617-2/ dated tank the 02/03/2007

7

OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT SOUTH WAZIRISTAN, AT TANK

RE-APPOINTMENT ORDER:-

In light of the Notification No. 50(L)/SSD/CSTR/99-108, dated 11.05.2012 issued by FATA Secretariat, Social Sectors Department and Director of Education, FATA memo No. 8964-76, dated the 28th June, 2012, the following female P.T.C. Teachers serving in Community Schools are hereby re-appointed as regular PST in BPS-12 plus usual allowances as admissible under the rules purely on temporary basis with effect from 01.07.2020. The appointments have been made on Tehsil-wise merit policy against the vacant PST posts in regular schools in the interest of the public service:-

S. NO.	NAME WITH FATHERS NAME	NAME OF SCHOOL WHERE APPOINTED	TEHSIL	REMARKS
01	Miss Shahida D/O Usman Shah, PST, GFCS Sadiq Shah Kot Janjal Syedan	GGPS New Haghzal, Tehsil Serwakai	Serwakai	Tehsil wise merit Miss Narda PST Transferred to GGPS Nawlar Muzfar Kot Ludha vide this office No 3489-96 dated 06.07.2020
02	Miss Aala Bibi D/O Muid; Amin Jan, PST, GFCS Muid Ayub Kot D. Arakal	GGPS Muhammad Ayub Kot Tehsil Serwakai	Serwakai	Tehsil wise merit newly created PST Post at GGPS Muhammad Ayub Kot Tehsil Serwakai
03	Miss Ihsad Bibi D/O Noor Muhammad, PST, GFCS Tanni Nazki Khel	GGPS Chagmalal Tehsil Serwakai	Serwakai	Tehsil wise merit & vacant PST Post
04	Miss Fatima Bibi D/O Kajal Khan, PST, GFCS Dicer Jafal	GGPS Usman Kot Madina Murr Tehsil Serwakai	Serwakai	Tehsil wise merit Newly created PST Post at GGPS Usman Kot Madina Murr Tehsil Serwakai
05	Miss Rozina Mahsud D/O Abdul Sattar, PST, GFCS, Shor Dard Shah Kot	GGPS Mahr Tal Kot Tehsil Serwakai	Serwakai	Tehsil wise merit Newly created PST Post at GGPS Mahr Tal Kot Tehsil Serwakai
06	Miss Hina Begum D/O Afsar Khan, PST, GFCS Jalal Korona Bawand	GGPS Zia ul Haq Biland Gul Tehsil Serwakai	Serwakai	Tehsil wise merit Newly created PST Post at GGPS Zia ul Haq Biland Kot Gul Tehsil Serwakai
07	Miss Dilshad Bano D/O Haji Muhammad Afzal, PST, GFCS, Mak. Afzad Khan Kot	GGPS Muzfar Kot Tehsil Shakai	Tarza	Tehsil wise merit Miss Rahila Bibi PST Transferred to Newly created PST Post at GGPS Hashud Bano Khan Kot Tehsil Makin vide this office No 3489-96 dated 06.07.2020 and no other candidates available
08	Miss Hanifa Asmat D/O Auratullah, PST, GFCS, Col Miteen Kot	GGPS Jehangir Kot Tehsil Shakai	Tarza	Tehsil wise merit newly created PST Post and no other candidates available
09	Miss Ruqia Maleen D/O Maleen, PST, GFCS, Col Maleen Kot	GGPS Tongi Paray Khel Tehsil Tarza	Tarza	Tehsil wise merit newly created PST Post at GGPS Tongi Paray Khel Tehsil Tarza

TERMS AND CONDITIONS:-

- The appointments of the candidates are being made purely on temporary basis & are liable to terminate at any time without assigning any reason.
- Charge report should be submitted to all concerned in duplicate.
- All kinds of documents which are not verified should be verified from the concerned institutions.
- If they failed to report of their arrival to their place of duty within 15 days, their appointment order will be considered automatically as cancelled.
- In case the documents / Certificates of candidate proved bogus, his / her appointment will be cancelled and the next deserved candidate will be appointed. The pay (if drawn) will be recovered from the candidate and will be deposited in the government Treasury.
- In case of resign, he/ she will submit the application one month before the date of resignation otherwise he/she will deposit the pay of one month in the government Treasury.
- before taking over charge, each candidate will provide a certificate on the stamp paper that he/she has no any other service in the government / Semi government institution/department.
- They will not claim seniority of the period served as Community School Teacher.

Encl: No. 310/24 /Dated Tank the, 13/7 /2020
Copy of the above is forwarded to the:-

- Director Elementary & Secondary Education, Tarza.
- Director of Education, South, FATA.
- Deputy Commissioner, District South Waziristan, At Tank.
- District Accounts Officer, District South Waziristan, At Tank.
- AEEO concerned.
- Accountant local office concerned.
- Candidate concerned.

DISTRICT EDUCATION OFFICER
S.W. DISTRICT AT TANK.

DISTRICT EDUCATION OFFICER
S.W. DISTRICT AT TANK.

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7

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**OFFICE OF THE DISTRICT EDUCATION OFFICER, DISTRICT SOUTH WAZIRISTAN
AT TANK.**

Re-appointment order:-

In light of the notification no SO(F)/SSD/CSTR/95-IOB Dated 11-05-2012 issued by FATA secretariat, social sectors department and director of education FATA memo no 896476 dated 26 june 2012 the following female PTC teacher serving in community schools are hereby re-appointed as regular PST in BPs 12 plus usual allowances as admissible under the rule purely on temporary basis with effect from 01-07-2020. The appointments are made on tehsil wise merit policy against the vacant PST posts in regular schools in the interest of public servants.

S.No	Name with father name	Name of school where appointed	Tehsil	Remarks
1.	Miss shazia D/o Usman Shah PST GFCs Sadeeq Shah, Court Janjal, Saidaan	GGPS New Raghzai, Tehsil Serwakai.	Serwakai	Tehsil wise merit Miss Nazia PST transferred to GGPS Nandari, muzaffar kot, ladha vide this office no 348996 dated 06-07-2020.
2.	Miss Asia Bibi D/o Muhammad Amin Jan PST GFCs Muhammad Ayubkot Darakai	GGPS Muhammad ayub kot tehsil Sarwekai.	Sarwekai	Tehsil wise merit newly created PST posts at GGPS Muhammad ayub kot, tehsil sarwekai.
3.	Miss Irshad Bib D/O Noor Muhammad PST GFCs Tangi Nazar Khel.	GGHS Chaghmalai, Tehsil Sarwekai	Sarwekai	Tehsil wise merit and vacant PST post.

Terms and conditions.

1. The appointments are being made purely on temporarily basis and are liable to termination on any time without assigning any reason..
2. Charge report should be submitted to all concern in duplicate.
3. All kinds of documents which are not verified should be verified from the concern institutions.
4. If the failed to report of their arrival to their place of duty within 15 days their appointments orders will be considered automatically as cancelled.
5. In the case the documents/certificates of candidate proved bogus his/her appointment will be cancelled and the next deserving candidate will be appointed. The pay drawn will be recovered from the candidate and will be deposited to the government treasury.
6. In case of resign, he/she will submit the application one month before the date of resignation he/she will deposit the pay of one month in the government treasury.
7. Before taking over charge each candidate will provide a certificate on a stamp paper that he/she has no other service in the government/semi-government institution/department.
8. They will not claim seniority of the period as continuously by the head teacher.

**District Education Officer
South Waziristan at Tank.**

Endst no 3/0-24 dated tank the 13/07/2020

پانچ روپے

پانچ روپے آرڈر نمبر ای. سی. ایچ. ڈی. (F) - 5 - A.D. E.

31 - 24 - 7/14 قبل بودا از روپے بوجہ حکم نمبر 4 - 2 - 31

W. F. O. - W. T. D. ... آمد از دستر ... 13 / 7 / 2020

تبدیل پورا ہے نمبر 77/11. بکنڈ. Uvacnit. یوسٹ ناچارہ سہالیا ہے۔

مقام جیکب آباد ... گورنمنٹ ڈپارٹمنٹ آف گنڈاپور ایچ. پی. جی. پی. کولہ

موضوع نمبر 2020 / 7 / 14

ایس

چارہ ارضیہ

چارہ چٹندہ

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B-9

مخدت جناب پیڈ مشہ صاحبہ کو دفت گراڈ پر اپنی سکول چکلائی
صلح اور خوشترستان

جناب عالی!

موربانہ اتھاس سے کہ سائلہ کو دفت گراڈ پر اپنی

سکول چکلائی میں بطور PST اسٹافی ہے اور اپنی خدمات

اسی طریقے سے سہما دینا چلی آ رہی ہے، لیکن بوجہ
بیماری (Major depression disorder) پر موقع

ڈاکٹر کی تجاویز پر ڈیوٹی سے اجازت دینے سے

قاصر ہے۔ اور ڈاکٹرز نے ہر قسم کا کمرے سے منع

کر رکھا ہے۔ اسلئے استدعا کی جاتی ہے کہ

میں سائلہ کو میڈیکل گراؤنڈ پر 2 دو ماہ کی

چھٹی عیادت کی جاوے۔ میڈیکل سرٹیفکیٹ

بمراہ لیا ہے۔

آپ کی عین نوازش دیوگی

آپ کی مابعدا

مورخہ: 2021-07-01

ارشد جی جی PST

GGPS Chagmalai

ارشد

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خدمت جناب پیدل سربراہانہ گورنمنٹ گولڈ میڈل اسکول چگملائی
ضلع ساہیوال سرگودھا

جناب عالی!

گزارش ہے کہ من سائلہ GIGPS Chagmalai
اسکول میں آپ کے زیر سایہ پرائیمری سکول ٹیچر کی
حیثیت سے اپنی ڈیوٹی سرانجام دینی چلی آ رہی ہے،
چونکہ من سائلہ 2007ء میں بیوٹی ٹیچر کی حیثیت
سے بھرتی ہوئی تھی اور خوش اسلوبی سے اپنا ڈیوٹی
سرانجام دی، کبھی شکایت کا موقع نہیں دیا۔
اب چونکہ من سائلہ سڈ پر بیمار ہے اور بقول ڈاکٹرز
صاحبان سڈ پر اپنی تندرستی کا سیکلر میڈیسن اور
ڈاکٹرز کے پلان پیان مطابق پر وہ موقع ڈیوٹی سرانجام
دینے کا مہرہوں چلی وہ نے ڈاکٹرز صاحبان نے
آرام کا سٹورہ دیا ہے۔ میڈیکل سٹیبلٹ پیرا
ہے۔ جو حیوانات بال اسٹا ہے کہ من سائلہ کو مزید
5 مہینوں کی چھٹی عنایت فرمائی جانے۔
آپ کا عین توجہ و تامل ہوگی

مورخہ: 20/09/2021 آپ کی تابعدار سائلہ ارشد

ارشد حاجی PST Chagmalai

Handwritten signature and stamp: ATTSTEN

مخدوم جناب پیدل صاحبہ گورنمنٹ گراڈ پرائمری سکول جملائی
ضلع ساہیوال وزیرستان

جناب عالیہ

اسٹڈ عالیہ جاتی ہے کہ من سائلہ گورنمنٹ

گراڈ پرائمری سکول جملائی میں بطور PST ٹیچر اپنی
خدمات سرانجام دیتی چلی آ رہی ہے اور من سائلہ نے
کبھی شکایت کا موقع نہیں دیا اور 7 2007ء سے کمپوٹی ٹیچر
بھرتی ہوئے کے بعد خوش اسلوبی سے اپنی ڈیوٹی کی
اب چونکہ من سائلہ (Major depression disorder) بیماری

میں مبتلا ہوئے کی وجہ سے ڈیوٹی سرانجام نہیں دے
سکتی اور میرے علاج کے لیے ہسپتال آ کر کے ماستورہ دے
رہے ہیں اور مکمل صحت پائی گئی ہے تاکہ
سے منع کرے رہے ہیں۔ دریں سبب من سائلہ

پہلے ہی درخواستیں دے چکی ہے ایک مذکور

اسٹڈ عالیہ جاتی من سائلہ کو میڈیکل سپورٹس 2 دو ماہ کی
مددیں چھٹی عنایت فرمائی جاوے۔ میڈیکل سرفیکلیٹس کے

آپ کی عین نوادش ہوگی

آپ کی جان بچاؤ سائلہ ارشد

22-01-2022

ارشاد بی بی جملائی PST

GGPS

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خدمت جناب پیڈاٹر صاحبہ اور نعت گرز پر اشری سکول جگملائی
ضلع ساہیوال سرحد

جناب عالی!

گزارش آجاتی ہے کہ میں سائلہ جگملائی GGPS
میں بطور PST اسٹانی کی حیثیت سے ڈیوٹی پر مامور ہے
میں سائلہ نے ایجا کیمبر میں بھی شغلیت کا موقع نہیں دیا
لیکن اب چونکہ میں سائلہ سڈیلڈ تھی بیماری جگملائی
Language میں Maps Depression disease کہا جاتا ہے میں
مثلاً ہوں۔ جو وہ حالات آئے ہیں نظر من سائلہ
احسن طریقے سے ایجا ڈیوٹی سر انجام میں دے سکتی۔
ڈاکٹر صاحبان کی بیانات کی پیش نظر من سائلہ حلال
طور پر آرام سے رہنا شروع دیا گیا ہے۔ اسی نسبت
میں سائلہ میں بھی درخواستیں گزار چکی ہیں اور مزید
بھی استدعا کرتی ہے کہ میں سائلہ کو میں ڈیکلینا
پر تقریباً ۶-۷ ماہ کی طبیعت کی حالت میں
ڈیکلینا سٹیٹ ہسپتال میں آ رہی ہیں۔

آپ کی میں نوازش ہوگی

آپ کی حاجتدار سائلہ

ادستاد صاحبہ Chagndai GGPS PST

08/03/2022 مورخہ

ارشد

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حکومت جناب پید میں صابہ کوہنٹ گریڈ پرائمری سکول چکلائی
صلوہ مکتوبہ سرستان

جناب عالی! گزارش کی جاتی ہے کہ من سائل آپ کی زیر سلاہ
GGPS Chagmalai سکول میں پرائمری سکول پنچم کی حیثیت سے
ڈیوٹی پر مامور ہے من سائلہ پچیس خوش اسلوبی
ڈیوٹی کرنے کی قائل ہے اور 2007ء سے لے کر اب تک
کسی شکایت کا موقع نہیں دیا۔ اب چونکہ من سائلہ شدید
زخمی بیماری میں مبتلا ہے اور ڈاکٹر زہا صبان بار بار
آرام فرمانے کا مشورہ دیتے ہیں۔ میری صحت کو
مد نظر رکھتے ہوئے اور انسانی تندرستی کا خاطر
مجھے چھٹیاد رکھا ہے جسکی بابت پچیس بھی میڈیکل
سرٹیفیکیشن پیش کی گئی ہیں اور فدیہ بھی پیش
کرتے ہیں جو کہ لف درخواست لیا ہیں۔
بوجو بات بالا من سائلہ میڈیکل بنیاد پر 2 ماہ کی تقریباً
طلب کار ہے اور عنایت کرنے پر منگور رہوں گی

آپ کی عین خواہش ہوگی
آپ کی تابعدار سائلہ

مورف: 09/05/2022

ارشاد حاجی PST GGPS Chagmalai

ارشاد

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ATTSTED

(14)

خدمت جناب پیڈگوجی صاحبہ گورنمنٹ گزٹری پرائمری سکول چملائی
ضلع ساہیوال پاکستان

جناب عالی! گزرتی جاتی ہے کہ من سائلہ گورنمنٹ گزٹری پرائمری

سکول چملائی میں بطور آڈیٹنگ پورٹ پورٹ پر مامور ہے۔

من سائلہ نے 2007ء سے لے کر اب تک اپنی تمام سرزمداریاں

نہایت خوش اسلوبی پیش کی ہیں۔ لیکن اب کچھ عرصہ سے

سائلہ شدید ذیابیطور پر بیمار ہے جسکی نسبت

سائلہ نے پہلے بھی کئی بار آپ جناب کی نوٹس

میں لاکھی ہے اور ساتھ بطور ثبوت میڈیکل سرٹیفکیٹ

بھی پیش کی ہیں۔ چونکہ من سائلہ اب تک مذکورہ

بیماری میں شدید طور پر مبتلا ہے اور ڈاکٹر

صامان کے مشورہ کے مطابق من سائلہ کو

مکمل طور پر آرام کی ضرورت ہے دریں نسبت

من سائلہ کو تقریباً 2 ماہ کی چھٹیوں عنایت

فرمائیں۔ میڈیکل سرٹیفکیٹ ہمراہ لگا ہے۔

آپ کی عین دوازش ہوگی

آپکی تاجدار سائلہ

ارشاد جناب
PST G.G.Ps Chagndai

مورف 28/10/2022

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خدمت جناب پیر محمد سلیمان صاحبہ کو وقت گزر کر اپنی سہولت چکلائی
صلحہ سافٹ ویئر

جناب عالی! استدعا کی جاتی ہے کہ سائلہ GAPS Chagmalai

سکول میں بطور PST پتھر مامور ہے۔ من سائلہ عمر
دراز سے اپنی ڈیوٹی خوش اسلوبی سے سرانجام دیتی
رہی ہے۔ لیکن اب من سائلہ کے Major depression نامی
بیماری میں مبتلا ہے جسکی نسبت سے من سائلہ
اپنی معمولات زندگی میں تبدیلی دینی تیناڈ کاشتکار
ہے اور اسی طرح اپنی ڈیوٹی سے انجام دینے سے قاصر ہے
دریں نسبت من سائلہ پہلے بھی کئی بار آپ جناب کی
نوٹس میں لاکھی ہے کہ ڈاکٹر صاحبان کے مشورہ
کے مطابق من سائلہ کو مکمل صحت یابی تک
آدام کی ضرورت ہے دریں نسبت من سائلہ پر
رحم فرمائیں تقریباً دو 2 ماہ کھی چھٹیاں عنایت
فرمائیں۔ میڈیکل سرٹیفکیٹ پر اہل ہے۔

آپ کی عین دوازش ہوگی

آپ کی تاحصلہ استعاذم
13/01/2023

استاد صاحب پیر محمد سلیمان صاحبہ GAPS Chagmalai

استاد
ATSTED

خدمت جناب ہیڈ ماسٹر صاحبہ گورنمنٹ گریڈ پرائمری سکول چکلائی۔
صوبہ سندھ وزیر تعلیم

جناب عالی! گزارش کی جاتی ہے کہ من سائلہ گورنمنٹ گریڈ پرائمری سکول چکلائی میں بطور PST ٹیچنگ مامور ہے جو کہ 2007ء میں اپنی ڈپوٹی فوش اسلوبی سے سرائیام دے رہی ہے۔ لیکن اب کچھ ٹائم سے من سائلہ شدید ہی طور پر بیمار ہے جیسے میڈیکل کی Language میں Major depression disorder کہا جاتا ہے۔ جکی وجہ سے

سائلہ کچھ عرصہ سے اپنی ڈپوٹی احسن طریقے سے سرائیام دینے سے قاصر ہے۔ جکی نسبت سے من سائلہ کئی بار آپ جناب کو آگاہ کر چکی ہے اور بطور ثبوت میڈیکل سرٹیفیکیشن بھی پیش کی ہیں۔ دریں نسبت سے من سائلہ کو ڈاکٹر صاحبان

نے حکم طور پر آرام کا سٹورہ دیا ہے اسدعا کی جاتی ہے کہ سائلہ کی صحت کو مدنظر رکھتے ہوئے تقریباً 2 ماہ کی چھٹیاں عنایت فرمائی جاویں۔

آپ کی عین نوازش ہوگی
ایکسٹریچر ار سائلہ ارشد
03 02 2023

ارشد بی بی PST CGPS Chagmalai

Arshad
ATTSTEE

C- (17)

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name ب.ب. شمس

Yearly No. 23335 Rs. 30/-

Date 29/06/2021 Disease _____

A Major depressive disorder ①

A/C

Tas Citarew 10p

- low mood و کمرنگی و غمگینی

- Sadness

- tiredness

Ts Okepora 5p

- Irritability

و کج خلقی

- Suicidal thoughts

Ts Nervatika-SR

Momied - No kids

و بچه نداشت

Body delus, headaches

Cap Nylis 2 4p

decrease sleep

و کم خوابی

Dr. Hussain Farid
MBBS, FCPS (Psych)
AD Psychiatric Unit/HQMC
D.I.Khan

Heed
Mural

ATTSTP

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name BB (u)

Yearly No. 55442 Rs. 30/-

Date 10/09/2021 Disease

F/o A Major depressive disorder (v)

A/c TS Co-depressive disorder

Suicidal thoughts

(u) (u) (u)

- low mood

TS Neurotic SR

- tiredness

(u) (u) (u)

- Irritability

- Body aches

Cap Risk hap

depressive sleep

(u) (u) (u) (28)

9/10/2021 ob. 2
(u)

TS OSO Ahmad
DR. Musammas (Psych)
MBBS. D.S. (Psych)
HOD. D.I.Khan
(u)

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ATTST

119

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name BB stari

Yearly No. 122 Rs. 30/-

Date 01/01/2022 Disease _____

F10 A major depressive disorder 3

Body aches

depressive mood

decrease sleep

irritability

Mooded / No aids

Self blame

Recurrent thoughts
of death

who ok or

Ts Citraun 10 p

res in 21

Ts Olepra 5 p

res in 21

Cap Capron 10 p
res in 21

Dr. Hussain Ahmad
M.D. (Psych)
H.O.D. Psychiatry
D.I. Khan

[Signature]

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D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name Irshad kibi

Yearly No. 1/800 Rs. 30/-

Date 27/03/2022 Disease

A major depressive disorder (1)

A/C

Sleep Improved

Irritability

guilt

fear of death

fear of worthlessness

Ts Citanew 20 p
10/10/2022

Ts Olexra 5 p
10/10/2022

Syp Favo-B12
2 + 2

Cap Digertin
1-1-1-20

Dr. Hussain Ahmad
MBBS, FCPS (Psych)
M.O.D Psychiatry DHQTH/GMC
D.I. Khan

10/10/2022
10/10/2022

[Signature]

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ATHESTEI

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name U. S. Khan

Yearly No. 32235 Rs. 30/-

Date 07/05/2022 Disease

Major depressive disorder

alc Maxalon

depressive mood 1-1-1-1-1

irritable Sup. Tris-oxeforte

demeanor 2-2-2-2-2
apetite

fear of death Citraner 20 p

manic/hallucinations 2-2-2-2-2

Anger Olpra 50 p

AD/PT (Signature)

M. Imran Ahmad
MBBS, FCPS (Psych)
H.O.D Psychiatry D.H.Q. D.I.Khan

(Signature)

ATTST

D.H.Q TEACHING HOSPITAL D.I.KHAN.
Out Door Patient's Department

Name _____ د. ب. ب. / استاد
 Yearly No. _____ 105632 _____ Rs. 30/-
 Date 27/10/2022 Disease _____

△ Major depressive disorder (6)

F10

depressive mood عصبیت
depression درد

Tiredness
decrease sleep
married - No kids

Is Olaya 5 p
وکیل

Irritability

Sup Fero-B12
2-e-l

وکیل
وکیل

Sup Trimetabul
وکیل
Dr. Hussain Ahmad
MBBS, FCPS (Psych)

Sup Rizidyl
وکیل
D.I.Khan

وکیل
وکیل

ATTSTE

23

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name U. B. Khan

Yearly No. 12382 Rs. 30/-

Date 21/02/23 Disease _____

Δ Major depressive disorder (8)

Alc F/O
depressive mood

Syp Fero B12
2 e 2

Mirtazapin

Syp Motilini
2 e 2 e 2

deems sleep T.S. Citarene 20p
not working

Condition Improved T.S. Ohepra-5p
2 e 1, 1

Dr. Hussain Ahmad
MBBS, FCPS (Psych)
R.O.D. Psychiatry DHQ/DGMC
D.I. Khan

Cap Contone 20p
2 e 1, 1

ATTESTED

24

D.H.Q TEACHING HOSPITAL D.I.KHAN.

Out Door Patient's Department

Name Irshad bibi

Yearly No. 4433 Rs. 30/-

Date 13/01/2023 Disease _____

Δ major depressive disorder (2)

A/c T> Ossor-D - 30
depressive mood No. 61

Mitashi T> Citarew 20p
P/O 20/01/23 No. 61

Qusar T> Qusar 25p
No. 61

Sr. Hassan Ahmad
M.B.S. / CPS (Psych)
H.O.D Psychiatry D.H.Q/D.I.KHAN

Cap. Niglas 40p
No. 61 - (14)

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ATTSTEF

D-25




Government of Khyber Pakhtunkhwa
Office of the District Education Officer, Female
SOUTH WAZIRISTAN
Email: deoswidofficial@gmail.com



NO 4082-88/DATED 21/10/2022

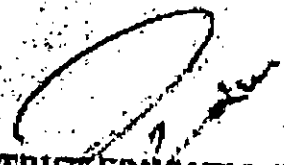
1. WHEREAS you Mst. Ishaq Bibi, Personal No 881040 & CNIC No 1210354883440 while serving as PST at GGPS Charmala were proceeded for having committed the following acts which constitutes inefficiency and misconduct under rules 3 sub rules (a) (b) & (d) of the Khyber Pakhtunkhwa Govt Servants (Efficiency & Disciplinary) rules 2011.
2. Whereas you remained absent from duties as reported by BMA (Education Monitoring Authority), (Since 2021-07-01 to date i.e. 653 Days) as the Undersigned as mentioned in various show cause notices served upon you.
3. AND WHEREAS Show cause notice was served upon you vide this office Endors: 1451-52 Dated 12-Oct-2022 and 1523-24 Dated 24-Oct-2022 by the competent authority i.e. District Education Officer (F) South Waziristan.
4. AND WHEREAS this office issued a letter vide No 1728-33 Dated 02-Nov-2022 to you for personal hearing and directed you to appear before the Committee along with documentary proof within Seven Days for reason of absence and non-reply with cogent reason.
5. AND WHEREAS you were failed to satisfy action committee in your personal hearing and failed to provide any cogent reason for your absence and you remained absent from duty till date.
6. NOW THEREFORE I Mst. Ghulam Fatima District Education Officer (F) South Waziristan, being Competent Authority in exercise of the power conferred under sub Rules 4-b (iii) and 9 of Govt of Khyber Pakhtunkhwa, Establishment & Administration Department Rules 2011, pleased to impose upon you the major Penalty of "Removal from service" with immediate effect.

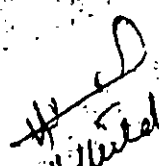

DISTRICT EDUCATION OFFICER (F)
SOUTH WAZIRISTAN

Endst No. & Date even

Copy of the above is forwarded to the:-

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner South Waziristan.
3. District Monitoring Officer South Waziristan.
4. District Account Officer, South Waziristan with the request to withhold the increments.
5. SDEO/DDEO concerned.
6. Official concerned
7. Master File


DISTRICT EDUCATION OFFICER (F)
SOUTH WAZIRISTAN


A. T. STEE

1:58 PM

📶 3G 57% 🔋 99%



Junaid Bro U

1:55 PM

تعمیراتی محکمہ ایک سہولت گزارا ہوا کریں۔ - - - - - تلاش کریں

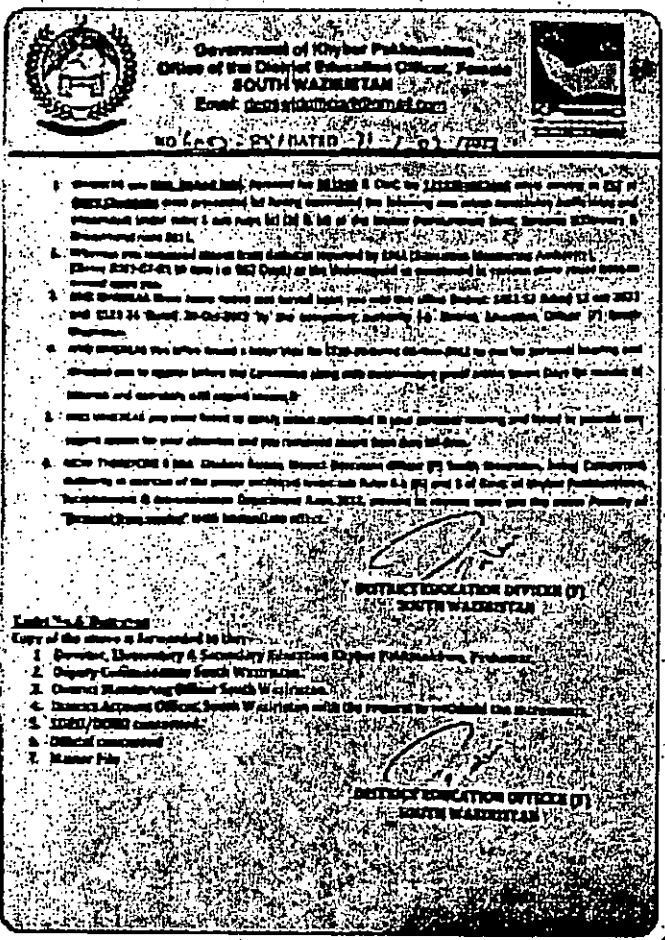
شہزادان مسجد گورنر تحصیل لڑخا جوتی وزیرستان

+92 314 511 1690

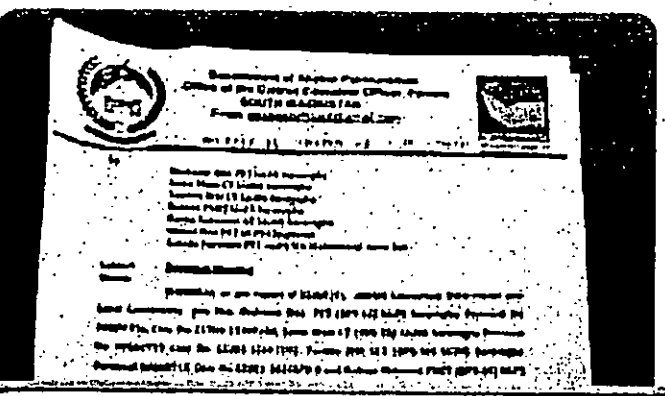
7:52 PM

March 15, 2023

Forwarded



Forwarded



ATTN: [Handwritten signature]

Message



To

The Director E&SE Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: Departmental appeal against impugned order dated 21.02.2023 communicated via whatsapp on dated 15.03.2023 whereby appellant is awarded major penalty of removal from service which is very harsh punishment and is illegal, unjustifiable.

Respected sir,

With due respect it is stated that the appellant was an employee of your good self department, served as PST since appointment at Chagmalai district South Waziristan, passionately and wholeheartedly. That the appellant was suffering from severe major depressive disorder since 2021 of which appellant sent medical receipt to the department timely for not marking her absent from duty. The department without looking into the medical receipts & health condition of the appellant astonishingly issued impugned order dated 21.02.2023, communicated via whatsapp dated 15.03.2023 whereby the appellant is awarded harsh major penalty of removal from service, though she was receiving her salaries till February 2023 regularly.

They appellant after receiving the said impugned order, couldn't control herself and further gone in depression and anxiety as this job was the only source of income for her family. The department neither issued show cause notice nor statement of allegation nor conducted regular inquiry into matter. The department on their own without looking into medical receipt declared her absent from duty, while its an obligation as per Rule-9 of E&D rules 2011 that if any civil servant is absent, notice be issued through registered acknowledgement and then in two leading newspaper for proper intimation and communication with department as to why you are absent from duty but department didn't comply with said provision of law and solely on the basis of education monitoring authority report she has been marked absent from duty and issued removal from service order against her. The action of department falls in arbitrariness and sheer autocracy being unaware of law and rules and usurping illegally the job of one major depressive disorder patient aggravated further patient psychological issues.

It is therefore, humbly requested that on acceptance of this departmental appeal the impugned order dated 21.02.2023 communicated via whatsapp dated 15.03.2023 wherein aforementioned harsh punishment is awarded to the appellant may very kindly be set aside and the appellant be reinstated into service with all back benefits. Any other relief which your good self deems fit that may also be awarded in favor of the appellant.

Dated 27.03.2023

APPELLANT

IRSHAD BIBI

Ex-PST GGPS Chagmalai,
District South Waziristan

POWER OF ATTORNEY/VAKALATNAMA**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR**

Irshad Bibi

VERSUS

Education Department

In Appeal No. _____ -P/2023

On behalf of Petitioner/Appellant No.

I/ we the petitioners/appellant hereby appoint **Mr. Afrasiab Khan Wazir** Advocate in the above-mentioned case, to do all or any of the following acts, deeds things.

1. To appear, act, sign, record Statement and plead for me/us in the above-mentioned case in this court /Tribunal or any other Court /Tribunal in which the same may be tried or heard, and other proceedings arising out of or connected therewith.
2. To sign, verify compromise and file or withdraw all proceedings, petitions, appeals, affidavits, and any other documents, as may be deemed necessary of advisable by them for the conduct, prosecution or defense of the said case at its stages.
3. To receive payments of, and issue receipts for, all money that may be or become due and payable to us during the course or on the conclusion of the proceedings.
4. To do all other acts and things which may be deemed necessary or advisable during the proceedings.

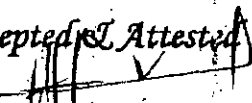
AND HEREBY AGREE:

- a. To ratify whatever the said advocate may do in the proceedings.
- b. Not to hold the Advocate responsible if the said case be proceeded ex-parte or dismissed in default in consequence of absence from the Court/Tribunal when it is called for hearing.
- c. That the Advocate shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof, I/We have signed this power of Attorney/ Vakalatnama hereunder, the contents of which have been read/ explained to me us and fully understood by me/ us.

Terms Accepted 

Signatures

Accepted & Attested **Afrasiab Khan Wazir**

Advocate Peshawar High Court, Peshawar.

Office Address:

Room No.6 Afridi Tower, Government College Chowk,

Faqirabad, Peshawar.

☎ 0312-9888752