

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.
(CAMP COURT ABBOTTABAD)

APPEAL No 1473 OF 2019

Mst. Gul Bibi -----

Appellant

VERSUS

1. Director Elementary & Secondary Education Peshawar
2. District Education Officer (Female) Kohistan Upper


Respondents

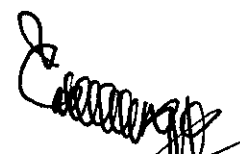
PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

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Dated 06-11-2023

29-11-23
A. Abdul



Respondent No. 2
District Education Officer,
(Female) Kohistan Upper

Abdul Haq
I/c DEO(F) Kohistan
Upper

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.
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1. Director Elementary & Secondary Education Peshawar
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PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

- I. That the appellant did not come to this Honorable Tribunal with clean hands.
- II. That the appellant has got no cause of action /locus standi to file the Instant appeal
- III. That the appellant is estopped to sue through his own conduct.
- IV. That the present appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
- V. That the appellant has concealed the material facts from this Honorable Tribunal, hence appeal is liable to be dismissed without any further proceeding.
- VI. That the appellant has already been removed from Service after Completion of all codal formalities vide order dated 20/04/2019, hence Appeal is liable to be dismissed.
- VII. That the appeal is time bared hence not maintainable and liable to be Dismissed.

Khyber Pakhtunkhwa
Service Tribunal
Case No. 8991
Dated 14-11-23

Factual Objections:

1. Para No. 1 is pertaining to the appellant personal record hence, needs no comment.
2. Para No.2 is Incorrect strongly denied that the appellant reported absent from duty by IMU as well as SDEO reported her absent from duty, show cause notice was served to the appellant on their home address no reply received then the respondent issued final show cause notice to the appellant on receiving no reply, the appellant did not performed her duty in school and proved unauthorized absent from her duty and at the end the same absent notice has been published in the leading newspaper but still the appellant did not join her duty at their school. The appellant was removed from service by following all the codal formalities.

(Copy of IMU report, SDEO report, show cause notice, absent notice And news paper Cutting is annexed as annexure-“A”).

3. Para No.3 is incorrect strongly denied that the appellant appeal was rejected by the competent authority due to fulfillment of all codal formalities in her removal order.

(Copy rejection of appeal is annexed as annexure-“B”).

4. Para No.4 is Incorrect strongly denied that the appellant was not aggrieved one, the appellant was removed from service by fulfillment of all codal formalities as per rule vide Endstt: No. 1198-1210 dated 20-04-2019.

(Copy of removal order annexed as annexure-“C”)

GROUNDS

- A- Incorrect, strongly denied that the appellant removed from service after fulfilling of all codal formalities as stated in Para 2 of factual objections.
- B- Incorrect strongly denied that the appellant was removed by following all codal formalities, issued her absence notice in the newspapers in which the allegation have been proved upon him as stated in Para 2 above of factual objections

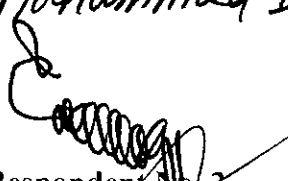
- C- Incorrect strongly denied that the show cause notice was issued to the appellant as well as issued her absence notice in the newspapers in which the allegation have been proved upon him as stated in Para 2 above of factual objections.
- D- Incorrect strongly denied that the appellant absence was proved and after that removed her by following all the codal formalities.
- E- Incorrect strongly denied the show cause notices was served to her , as well as issued her absence notice was issued in the newspaper after following all codal formalities the appellant has been removed from service as stated above Para No.2 of factual objections..
- F- Incorrect strongly denied that as stated in Para 2 above of factual objections.
- G- Incorrect strongly denied that the appellant was willfully absented himself from his School duty as stated in the above factual objection and show cause notice was served to him , a chance of personal hearing was also given to the appellant and also issued their absent notice to the newspaper by following all the codal formalities the appellant has been removed.
- H- Incorrect strongly denied as stated Para 2 of the above factual objections.
- I- Incorrect strongly denied that the appellant was absented herself from duty as stated Para 2 above of factual objection.
- J- Incorrect strongly denied that the removal order was passed by following all the codal formalities as stated Para No.2 of the above factual objection. The appellant appeal is time barred.

It is therefore, in the light of above stated facts and circumstances, Very humbly prayed that appeal in hand may please be dismissed with cost.


DIRECTOR

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Dr. Muhammad Iqbal


Respondent No. 2
District Education Officer,
(Female) Kohistan Upper

*Abdul Has
The DEAF, Kohistan
Upper.*

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(CAMP COURT ABBOTTABAD)

APPEAL No 1473 OF 2019

Mst. Gul Bibi _____

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PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

AFFIDAVIT

I, Mr. Abdul Haq ^{I/c} DEO (F) Kohistan Upper, is hereby solemnly affirm and declare that the contents of foregoing comments of the appeal No. 1473/2019 titled Mst. Gul Bibi versus Govt. of KPK are true and correct to the best of my knowledge and belief and nothing is being suppressed from the Honorable Tribunal.

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

[Signature]
DEPONENT

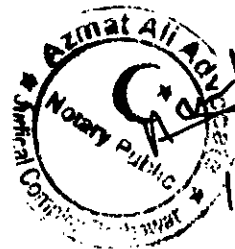
13403-DIS/115-1

Abdul Haq

I/c DEO (F)

Kohistan Upper

ATTESTED



14-11-2023



**DIRECTORATE ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I, Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Shah Wali Ullah Representative for DEO (F) Kohistan Upper to attend the Khyber Pakhtunkhwa Service Tribunal in connection with submission of para wise comments in Service Appeal No. 7849/2021, 1484/2019, 1473/2021, Mst Farza Bibi, & Mst Farzana Wali Mst Gul Bibi VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department

Director

**Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.**

Name gul b oi Father Name Bazmir Khan Designation PST First Appointed PST Gender Female
 Date Of Appointment 12.Feb 2006 Highest Qualification Level SSC/O-Level Subject Other BPS 4 Disability No

School Code	School	Date(dd/mm/YYYY)	personalNo	CNIC	Status	StatusDetails
30629	GGPS BAJA LOHI	09/12/2019 10:23:33	388443	1340122567862	Transfer Out	Removal from service
30629	GGPS BAJA LOHI	09/10/2019 10:44:52		1340122567862		
30629	GGPS BAJA LOHI	19/04/2019 08:45:12		1340122567862		
30629	GGPS BAJA LOHI	30/03/2019 11:17:40		1340122567862		
30629	GGPS BAJA LOHI	15/02/2019 11:04:25		1340122567862	Present	
30629	GGPS BAJA LOHI	26/01/2019 09:41:19	00388443	1340122567862	Present	
30629	GGPS BAJA LOHI	03/12/2018 09:18:05		1340122567862		
30629	GGPS BAJA LOHI	27/09/2018 09:20:20		1340122567862	Absent	Un-Authorized
30629	GGPS BAJA LOHI	09/05/2018 08:33:45	0	1340122567862	Absent	Un-Authorized
30629	GGPS BAJA LOHI	20/04/2018	0	1340122567862	Absent	Un-Authorized
30629	GGPS BAJA LOHI	21/03/2018	0	1340122567862		
30629	GGPS BAJA LOHI	26/02/2018	0000	1340122567862	Present	Activate Windows

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The Dy DED (F) Kohistan

22 24
2

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225
E

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (Female) DASSU

NO 505 SDEO(F) DASSU Dated 23/01/2019.

To,

The District Education Officer,
(Female) Kohistan.

SUBJECT; - RE-SUBMITT OF ABSENT TEACHERS REPORT.

Memo:-

Reference your office dairy NO 1789 dated 8/1/2019 subjects cited above.

The absent report, recommendation of action taken is re-submitted for further proceeding please.

S#	Name of school	Name of school	Absent Period	Decision taken
1	1-Luzhaba PST 2-sadaf Zaib PST	GGPS Pashot	1/1/2018 up till now	The teachers are still absent from duty proceed if agreed please
2	1-Raqiba saif PST 2-Asma saif PST	GGPS Sergari	5/3/2018 up till now	Both the teachers absent from duty, proceed if agreed
3	Farzana Wali PST	GGPS Jakh	10/6/2018	The teacher still absent from her school duty proceed, if agreed please
4	Shaheen Zameer PST	GGPS Lohi Dadair	1/3/2018 up till now	The teacher still absent from her school duty proceed if agreed please
5	Gul Bibi PST	GGPS Baja Lohi	1/3/2018 up till now	The teacher still absent from her school duty proceed, if agreed please
6	Nuzhat Ara PST	GGPS Harban Kot	1/1/2018 up till now	The teacher still absent from her school duty proceed, if agreed please
7	Tehmina Rohi PST	GGPS Kuz Komila	1/1/2018 up till now	The teachers still absent from her school duty proceed, if agreed please.
8	Zuhra Bibi PST	GGPS Kherza Khel	3/4/2017 up till now	Teacher is still absent from duty proceed, if agreed please.

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Handwritten signature 23/01/19
Sub Divisional Education Officer,
(Female) Dassu



(8) (90)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN**

FINAL SHOW CAUSE NOTICE

I, Mr. Khurshid Ahmed, District Education Officer, (Male) Kohistan, being a competent authority under the Khyber Pakhtunkhwa Govt: Servants (E&D) Rules, 2011, do hereby serve you Mst; Cgul Bibi PST GGPS: Baja Lohi as follows:

1. That consequent upon the report of IMU, your school was found closed & non-functional since long. You remained absent from your School duties willfully.
2. I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:
 - (i). Guilty of habitually absenting herself from duty without prior approval of leave.
4. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty under rule 4 (b) of the said rules.
5. You are therefore, required to finally show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desired to be heard in person.
6. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

Endstt: No 273 /Dated Kohistan the 26/01 /2019

Copy of the above is forwarded to the:
1. Mst; Cgul Bibi PST -- Baja Lohi

No.1217

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or of which no acknowledgement is due.

Rs. Ps.

38 00

**COMPETENT AUTHORITY
(District Education officer)
(F) Kohistan**

Received a registered* addressed to _____

Date-Stamp _____

Initials of Receiving Officer _____
*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ (in words) _____

Name and address of sender _____

If insured.

[Handwritten Signature]

(9)

(78)

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) KOHISTAN.

No. 465

Dated 18-2 /2019.

To,

The Deputy Director information
Khyber Pakhtunkhwa Abbottabad

Subject;
Memo;

FINAL SHOW CAUSE NOTICE

Enclosed please find herewith 7 copies of Show cause notice for publishing in the daily News Papers at least one in the local Abbottabad. The budget is available for the advertisement charge and the bill may be sent to this office please.

D.E.O.
District Education Officer
(Female) Kohistan.

E/No. 466-71 /DEO (F) KH:

Dated 18/2 /2019

Copy forwarded to-

1. The Director E&SE Khyber Pakhtunkhwa Peshawar
2. The Deputy Commissioner, Kohistan.
3. The District Monitoring Officer (IMU) Kohistan
4. The District Accounts Officer Kohistan
5. The Deputy District Education Officer (F) Kohistan
6. The SDEO (F) Dassu, Pattan Pallas

D.E.O.
District Education Officer
(Female) Kohistan.

DDEO (F)
18/2/19

No. 1425

For Insurance Notices see reverse.

Stamps affixed except in case of unweighed letters of not more than the (initial weight) prescribed in the post office (in words) of the office of origin.

acknowledgement is due.

received a registered letter addressed to

of the receiving office with the word "insured" before it when necessary.

Insured for Rs. (in figures) (in words)

Kilo Grams

Weight (in words)

Insurance fee Rs. Ps. (in words)

Rs. Ps.

(9)

نوٹس غیر حاضری

آپ مندرجہ ذیل معلومات IMU/SDEO/ASDEO کی رپورٹ کے مطابق بغیر وجہ ڈیوٹی سے غیر حاضر ہیں۔ آپ کو آپ کی غیر حاضری کے بارے میں زیر دستخطی کے دفتر میں موجود آپ کے گھر کے پتہ پر کاشوکار نوٹس بھی جاری کیا جا چکا ہے۔ لیکن آپ کی طرف سے تاحال کوئی جواب نہیں ملا اور نہ ہی اپ اپنی ڈیوٹی پہ حاضر ہوئی۔ لہذا آپ کو ہڈریا اخبار آخری نوٹس دیا جاتا ہے کہ سات (7) دن کے اندر اندر زیر دستخطی کے دفتر میں حاضر ہو کر اپنی غیر حاضری کی وجہ بتائیں بصورت دیگر مقررہ عہدہ گزر جانے کے بعد آپ کے خلاف E&D رولز 2011 کے تحت یکطرفہ قانونی کارروائی عمل میں لائی جائے گی۔

نمبر شمار	نام	مقام ڈیوٹی
1	گدھہ PST	GGPS پشوت
2	”صدف زیب PST	GGPS پشوت
3	راقیہ PST	GGPS سیرگرھی
4	عاسہ PST	GGPS سیرگرھی
5	فرزانہ والی PST	GGPS جھاج لوہی
6	شامین ضمیر PST	GGPS لوہی دادیر
7	گل بی بی PST	GGPS پادہ لوہی
8	نرہت آرا PST	GGPS ہرہن کوٹ
9	تہینہ دوجی PST	GGPS کوز کو میلا
10	زہرا بی بی PST	GGPS خرزائیل دادیر
11	ناگیہ اوتیل PST	GGPS پادہ لوہی
12	شگفتہ کیرن PST	GGPS ڈوب لوہی

19/7/19

5

Unsuccessful absent in
Divisional Educa.
Notice issued show cau-
sation but not submit
for personal he.
Teachers in time.
i.e. Dau.
Others were
noted

(17)

GGPS میرال شاہ	گل بی بی PST	13
GGPS کیسیا آباد	PST زرینہ	14
GGPS کیسیا آباد	PST سلمہ بی بی	15
GGPS میران آباد	PST شاکیرہ	16 ✓
GGPS گی ہریں	PST معصومہ	17
GGPS گی ہریں	PST لطیفہ	18
GGPS برک	PST جوہارہ بی بی	19
GGPS سیرٹو کنڈیا	PST راشدہ بانو	20 ✓
GGPS سیری گہریال	PST ربیحانہ	21
GGPS سیری گہریال	PST سارہ قدوم	22
GGPS سوہیل جٹوی	PST عاشق صادق	23
GGPS اوسے جے	PST بی بی صواب	24
GGPS بھٹی کوز شریال	PST فہمیدہ	25
GGPS بھٹی کوز شریال	PST بشر احظظ	26
GGPS موکن آباد	PST سلمہ	27
GGPS سگا آباد	PST صفیہ زرین	28
GGPS سگا آباد	PST تاحیدہ سراج	29
GGPS بریر شریال	PST مہناز	30

Convict Case ←

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Handwritten date: 19/7/19

(6)



ہر ایک کو یہی درخواست کرنا ہے کہ وہ اپنے نائب ہوتے ہیں، ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں، ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

38

قائد اعلیٰ کے دور میں تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

39

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

40

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

41

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

آپ کو آپ کی غیر جانبداری کی طرف سے تاج (بے دن کے اندر)

کے خلاف E&D

نمبر شمار

- 1
2
3
4
5
6
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11
12

ہر ایک کو یہی درخواست کرنا ہے کہ وہ اپنے نائب ہوتے ہیں، ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

49

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

56

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

57

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

58

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

59

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

60

ہر ایک کو یہی درخواست کرنا ہے کہ وہ اپنے نائب ہوتے ہیں، ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

61

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

62

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

63

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

64

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

65

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

66

یہاں کے تمام ممبران ہونا چاہئے اور ہر ایک کو یہ درخواست ہے کہ وہ اپنے نائب ہوتے ہیں...

نوٹس غیر حاضری

آپ مندرجہ ذیل سہولت IMU/SDEO/ASDEO کی رپورٹ کے مطابق غیر حاضری کی رپورٹ میں آپ کی غیر حاضری کے بارے میں...

Table with columns: No. (نمبر شمار), Name (نام), Position (مقام), and Remarks (نوٹس). It lists 38 entries for various positions like GPPS, PST, and GGS.

انتہی: ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) ضلع کوہستان INF(AD)43

روزنامہ ہفت روزہ نیوز 26/19

Handwritten signatures and stamps at the bottom of the page.

Insurance-related text and stamps on the right side of the page.

سربراہ نعتیہ خان VC اجلاس میں گامی راہی و انٹرنیشنل کمیٹی قرار دادوں

اپنی افواج کے ساتھ کھڑے ہیں اور ہم اپنے ملک کی خاطر کسی قربانی سے بھی دریغ نہیں کریں گے۔ اجلاس میں فیصلہ برائے وقت خان (دارالعلوم) کے وقت خان مانا گیا۔ خان کے کزن اور بھائی کی تصدیق کے مطابق جس مقام پر ان نے حرکت کی اجلاس میں تمام اہم اجلاس میں سرکاری اہلی ماگرا کرنے کے لیے قرار کو مشورہ دیا۔ وقت خان میں بیٹا کوئل کا ایک اور پریات جیت کی گئی اجلاس میں وہی ہی سوائے دارچین پر مشورہ کی گئی قرار دادی کی سوائے وقت خان اجلاس میں سمدارت نائب مہتمم محمد رفیق مسعود ہوا۔ وقت خان (ہفتیہ نمبر 44)



سابقہ ایگزیکٹو کمیٹی کے اہلکاران کا عظیمان پر مشتمل ایک کمیٹی کی تجویز پر عمل درآمد میں، انہیں سب سے زیادہ فائدہ پہنچانے کے لیے ہر ایک کو اپنی ذمہ داریاں ادا کرنے کی تلقین کی گئی۔ سربراہ نے صراحت کی کہ انہیں سکول ٹیچرز فیاض خان انتقال کر گئے۔

نیشنل فیوچر حاضری

آپ کی موجودگی کی اطلاع IMU/SDEO/ASDEO کی طرف سے ملنے والی ہے۔ آپ کی حاضری کی اطلاع آپ کی طرف سے ملنے والی ہے۔ آپ کی حاضری کی اطلاع آپ کی طرف سے ملنے والی ہے۔ آپ کی حاضری کی اطلاع آپ کی طرف سے ملنے والی ہے۔

نمبر شمار	نام	مقام ایوان	نمبر شمار	نام	مقام ایوان
1	لاہور PST	GGPS	20	راولپنڈی PST	GGPS
2	میرپور PST	GGPS	21	راولپنڈی PST	GGPS
3	پشاور PST	GGPS	22	راولپنڈی PST	GGPS
4	پشاور PST	GGPS	23	راولپنڈی PST	GGPS
5	پشاور PST	GGPS	24	راولپنڈی PST	GGPS
6	پشاور PST	GGPS	25	راولپنڈی PST	GGPS
7	پشاور PST	GGPS	26	راولپنڈی PST	GGPS
8	پشاور PST	GGPS	27	راولپنڈی PST	GGPS
9	پشاور PST	GGPS	28	راولپنڈی PST	GGPS
10	پشاور PST	GGPS	29	راولپنڈی PST	GGPS
11	پشاور PST	GGPS	30	راولپنڈی PST	GGPS
12	پشاور PST	GGPS	31	راولپنڈی PST	GGPS
13	پشاور PST	GGPS	32	راولپنڈی PST	GGPS
14	پشاور PST	GGPS	33	راولپنڈی PST	GGPS
15	پشاور PST	GGPS	34	راولپنڈی PST	GGPS
16	پشاور PST	GGPS	35	راولپنڈی PST	GGPS
17	پشاور PST	GGPS	36	راولپنڈی PST	GGPS
18	پشاور PST	GGPS	37	راولپنڈی PST	GGPS
19	پشاور PST	GGPS	38	راولپنڈی PST	GGPS

ڈسٹرکٹ ایجوکیشن آفیسر (زمانہ) ضلع کوہستان INF(AD)43

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کونینم ایوان ایجوکیشن

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(D)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER-PAKHTUNKHWA PESHAWAR

ANNX

No. 202 / F.No. 324/F/Appeal Kohistan

Dated Peshawar the 02/10/2019

To

The District Education Officer,
(F) Kohistan

Subject:- APPEALS REGARDING REMOVAL FROM SERVICE

I am directed to refer to your letter No.5158 dated 02/09/2019 on the subject cited above and to state that the competent authority has rejected the appeals of the following teachers. Hence she may be informed accordingly.

S.No	Name and Designation	School Name
1.	Zarina PST	GGPS Kemia Abad Kohistan.
2.	Salma Bibi PTS	—do—
3.	Shakira Bibi PST	GGPS Mehran Abad
4.	Gul Bibi PST	GGPS Seral Shah
5.	Sadaf Zeb PST	GGPS Pashot
6.	Shaheen Zameer PST	GGPS Lohi Dader
7.	Raqiba PST	GGPS Ser Garhi
8.	Nagina Otail PST	GGPS Baja Lohi
9.	Asma PST	GGPS Ser Garhi Kandia
10.	Farzana Wali PST	GGPS Jhakt lohi
11.	Rehana Bibi PST	GGPS Seri Gabriel
12. ✓	Gul Bibi PST	GGPS Baja Looni ✓
13.	Johajra Bibi PST	GGPS Bar Bak
14.	Gul Shanaz Bibi PST	GGPS Nimraty Sosak Upper
15.	Bibi Rashida PST	GGPS Serto Kandia
16.	Shagufta Kiran PST	GGPS Dhoop Lehi
17.	Huree PST	GGPS Nimraty Sosak Upper
18.	Latifa PST	GGPS Ghee Harban
19.	Aisha Qurashi PST	GGPS Habib Abad Koli
20.	Aisha Sadiq	GGPS Soyul Jashoi
21.	Naheed Sartaj PST	GGPS Sanga Abad

Endst No. _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Shiraz

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

NOTIFICATION

Whereas the following teachers were reported wilful absent from duties by the concerned Assistant Sub Divisional Education Officers (Female), Sub Divisional Education Officers (Female) and Independent Monitoring Unit (IMU) Kohistan.

And whereas on the report of the visiting officers, this office issued show cause notices at home address through registered posts but neither the teachers joined their duties nor submitted convincing replies within the stipulated time (15 days) before the committees constituted for personal hearing via this office letter no. 394-98 dated 11-02-2019 and the same were conveyed to the teachers in time.

And whereas final show cause notices were issued through two leading newspapers i.e Daily "Hazara News" Manshehra and Daily "Akhbaar" Abbottabad dated 26/02/2019 in which teachers were directed to assume their duties and submit reason (s) of their wilful absence but neither they attended their schools nor submitted convincing replies before the committee within the stipulated period mentioned in the newspaper. Now in view of the above facts I, Mr. Khurshid Ahmed, being competent authority, as District Education Officer (female) Kohistan, is fully satisfied to impose major penalty of **REMOVAL FROM SERVICE** upon the teachers under rule 4b(iii) of E&D Rules 2011 with effect from the dates mentioned against each.

S#	NAME OF TEACHER	NAME OF SCHOOL	DATE OF REMOVAL FROM SERVICE
1	Lazhaba (G-4)	GGPS Pashot	01-10-2016
2	Sadaf Zeb	GGPS Pashot	01-10-2017
3 ✓	Raqiba ✓	GGPS Ser Garhi ✓	01-10-2017 ✓
4	Asma	GGPS Ser Garhi	01-10-2017
5 ✓	Farzana Wali ✓	GGPS Jhakh Lohi ✓	✓ 01-04-2018 ✓
6	Shaheen Zameer	GGPS Loohi Dader	01-10-2018
7 ✓	Gul Bibi ✓	GGPS Baja Loohi ✓	✓ 01-04-2018 ✓
8	Nuzhat Ara	GGPS Harban kot	01-05-2018
9	Tahmena Roohi	GGPS Kuz Kamila	01-01-2017
10	Zuhra Bibi	GGPS Kherza Khail Dader	01-10-2015
11	Nagina Otail (G-4)	GGPS Baja Lohi	01-05-2016
12	Shagufta Kiran	GGPS Dhoop Lohi	01-01-2019
13	Gul Bibi	GGPS Seral Shah	01-04-2018
14	Zarmina	GGPS Kemia Abad	01-01-2019
15	Salma Bibi	GGPS Kemia Abad	01-01-2019
16	Shakira	GGPS Mehran Abad	01-03-2018
17	Masooma	GGPS Ghee Harban	01-04-2018
18	Latifa	GGPS Ghee Harban	01-01-2019
19	Johajra Bibi	GGPS Bar Bak	01-04-2018
20	Rasheeda Bano	GGPS Serto Kandia	01-10-2017
21	Rehana	GGPS Seri Gabriel	01-01-2019
22	Sara Qayum	GGPS Seri Gabriel	01-11-2018
23	Aisha Sadiq	GGPS Soyai Jashoi	01-04-2018
24	Bibi Hawa (G-4)	GGPS Awaysach	01-12-2016
25	Fahmeeda	GGPS Bhati Kuz Shrial	01-11-2017

Khurshid Ahmed

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26	Bushra Hafeez	GGPS Bhati Kuz Shiryal	01-01-2019
27	Salma	GGPS Momin Abad	01-01-2019
28	Safia Zareen	GGPS Sanga Abad	01-01-2019
29	Naheed Sartaj	GGPS Sanga Abad	01-01-2019
30	Mehnaz	GGPS Berser Shared	01-11-2017
31	Aisha Qureshi	GGPS Habib Abad	01-11-2017
32	Shema	GGPS Jaren Ranolia	01-01-2019
33	Durkhana	GGPS Kas Dobair	01-05-2017
34	Robina Syed	GGPS Ali Abad	01-11-2018
35	Nasreen Sultan	GGPS Tares	01-12-2018
36	Fatima Akhtar	GGPS Serzahab Abad	01-02-2019
37	Rizwana Bibi	GGPS Z K Abad	01-12-2018
38	Mufeed Akhtar	GGPS Sher Abad	01-12-2018

NOTE: Any teacher who is found involved in any embezzlement of fund/conditional grant, she will be proceeded for FIR/Anti-corruption proceedings as and when reported at any stage. Concerned DDs are directed to recover the payment (if any) made for absence period out of their GPF etc.

[Signature]

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

Endst No: 1198-12-10 Dated: 20-04-19

Copy for Information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohistan.
3. Deputy Commissioner Kohistan Lower.
4. Deputy Commissioner Kolai Palas Kohistan.
5. District Monitoring Officer Kohistan.
6. DEO (M) Kohistan Lower & Kolai Palas Kohistan.
7. District Accounts Officer Kohistan.
8. PA to Advisor to CM for Elementary & Secondary Education Khyber Pakhtunkhwa.
9. PA to Secretary (E&SE) Govt of Khyber Pakhtunkhwa Peshawar.
10. All concerned teachers.
11. PA to DEO (M/F) Kohistan.
12. Office copy.

[Signature]

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

20/4/19

[Signature]

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