

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO.2031/2023

Mst.Husna BiBi W/O Shahid Khan R/O Jehan Abad Tehsil Charbagh District Swat.
.....APPELLANT

V E R S U S

1. Secretary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Education, Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (F) Swat at saidu Sharif.
4. Sub Divisional education Officer (F) Circle Charbagh swat.
5. Assistant Sub Divisional Education Officer(F) Circle Charbagh Swat.

.....Respondents

I N D E X

S#	DESCRIPTION	ANNEX;	PAGES
1	Para wise Comments	...	1-3
2	Affidavit	...	4
3	Office order dated 24.3.2023	A	5
4	Explanation dated 29.9.2022	B	6
5	Reply of Explanation	C	7-8
6	Explanation dated 28.2.2023	D	9
7	Reply of explanation	E	10-11
8	Letter of personal Hearing dated 20.3.2023	F	12
9	Monitoring report	G	13
10	Deputy Commissioner directives regarding Deduction of Salary for 03 days	H	14-15
11	Source of deduction for Salary of 03 days ,Rs.4757/-	I	16
12	Authority Letter	J	17

DR. SHAMIM AKHTAR
District Education Officer(F) Swat

original.

one copy handed over to AG staff.

04-01-2024

Swat

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO.2031/2023

**Mst.Husna BiBi W/O Shahid Khan R/O Jehan Abad Tehsil Charbagh District Swat.
.....APPELLANT**

VERSUS

1. Secretary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Education, Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (F) Swat at saidu Sharif.
4. Sub Divisional education Officer (F) Circle Charbagh swat.
5. Assistant Sub Divisional Education Officer(F) Circle Charbagh Swat.

**Khyber Pakhtunkhwa
Service Tribunal.**

Diary No. 9995

Dated 20-12-2023

.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1, to 5

Respectfully Shewth;

The Respondents submits as under;

Preliminary Objections.

1. That appeal is badly barred by time and hence liable to be dismissed.
2. That the appellant has no cause of action and locus standi to file the instant appeal against the respondents.
3. That the appellant has concealed the material facts from this Tribunal, hence liable to be dismissed.
4. That the appellant has not come to this Hon; Tribunal with clean hands.
5. That the appellant has filed the instant appeal just to pressurize the Respondents.
6. That the Present appeal is liable to be dismissed for non-joinder and miss-joinder of necessary parties.
7. That the appellant filed the instant appeal on malafide motives.
8. That the Instant appeal is against the prevailing laws and rules.
9. That the appellant is estopped by his own conduct to file the instant appeal.
10. That the instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
11. That the appellant suppressed real facts from this Hon; Tribunal and filed the instant appeal to harass and blackmail the respondents.
12. That due to legal lacunas, the appeal in the present form and manner, is not maintainable, hence liable to be set aside.
13. That the instant appeal does not fall within the ambit /Purview of the Section 4 of the Service Tribunal Act.1974 .

ON FACTS.

1. That this para is correct that the appellant has been appointed on Adhoc basis and posted at GGPS Khwarpaty Tehsil Charbagh. It is pertinent to mention here that Post of Head Teacher is Vacant and shall be filled on the basis of Promotion from SPST, BPS-14 but promotion has not been made. However, Process for Promotion has been processed but for the school maintenance of record and Correspondence with the office for the smooth school business, therefore, the appellant was given temporarily in-charge ship of the School on 24.3.203 (Annexure-A) with the following Note/TORs;

Note;

1. The concerned In charge. Mst. Husna BiBi will perform her duty as in-charge of the school.
2. She will submit Monthly Gushara and other necessary documents/papers, signed by her regularly to the office of SDEO(F) Charbagh at Kot Charbagh.
3. She will attend official meetings falling within the Jurisdiction of Circle Charbagh without any excuse.
4. She will abide by rules & laws pertaining to Government Servants.
5. She will maintain and update all kind of school record accordingly.

It is also pertinent to mention here that this office order was not a permanent order and when PSHT (Primary School Head Teacher) Promotion finalized then the appellant order in question dated 24.3.2023 but it is the responsibility of the respondent to make arrangement for the school business and activities for the best interest of the little kids and public interest at large but the appellant intentionally concealed the facts malafidely and with malicious motives.

2. That this Para needs no Comments because all the teachers have been regularized according to the rules and Terms & Condition of their appointment order.
3. That this Para as drafted, is not admitted because the appellant is not honest to her duty and always remained absent and the ASDEO (F) Circle Charbagh called Explanation dated 29.9.2022 due to her absenteeism from duty on 28.9.2022 (Annexure-B) and she submitted her reply and used abusive language (Annexure-C) which is against the Conduct rules. Moreover, the appellant is not ready to obey order of the competent authority and failed to attend important meeting and similarly on 22.2.2023, the appellant remained absent due to which important information asked by Department, could not be finalized and Explanation was called on 28.2.2023 (Annexure-D) and the appellant again submitted reply in a rude behavior and abusive language and forwarded copies to the high-ups which is an violative act and against the Conduct rules (Annexure-E). For reconciliation and improvement in her behavior, respondent department called the appellant for Personal hearing vide No. & dated 20.3.2023 (Annexure-F) u and she attended the personal hearing and promised that she will be careful and will perform regularly and obey order of the authority. As the appellant did not reluctant and remained absent from duty and Monitoring Team found her absent from duty on 16.9.2023 (Annexure-G). It is obvious from the record of the Monitoring /EMA time and again reported her and finally during the DSC (District Steering meeting held on 25.7.2023, Chaired by Deputy Commissioner Swat and minutes issued in which “ It was decided that by the the chair that one days salary will be deducted from the teaching staff of closed schools and directed that Three days salary should be deducted in case of repetition. DEO(M/F) should keep such schools at their watch list” (Annexure-H) and in this connection Three days Salary has been deducted from the appellant by the then SDEO(F) Khwazakhela who was the DDO (Drawing disbursing Officer) for Sub Division Charbagh through Source and deducted amount Rs.4757/- (Annexure-I). All these actions reflect that the appellant is not interested in her duty and she is not an honest.
4. That this Para is not admitted and denied because the appellant concealed the facts from this Hon;Service Tribunal and the appellant attitude towards her duty is very much crystal clear from the detail as incorporated in the above Para-3 and there is nothing about the threatening and Pressurizing on the part of the respondent department . Hence this stance of the appellant is baseless and without any Proofs and evidence, therefore, the instant appeal is liable to be dismissed.
5. That this Para as drafted is not Correct and denied because the actual and factual Position has already been mentioned in the above Para-1 but the appellant intentionally concealed the facts. Hence the instant appeal having no backing law, is liable to be set aside.
6. That this Para as drafted is not Correct and beyond the reality because detail has already been incorporated in the above Paras No.1 & 3 and needs no further comments.
7. That this Para as drafted is not Correct because detail has already been incorporated in the above Paras No.1 & 3 and needs no further comments.
8. That this Para as drafted is not admitted because appellant does not fall within the purview of the aggrieved person and the action of the respondent department is legal, justified and lawful inter alia on the following grounds.

GROUNDS

- a. That this para is not admitted and denied because respondent department treated the appellants in accordance with the law & rules and the Order dated 24.3.2023 is legal, justified and no violation has been made and the order is sustainable in the eye of law.
- b. That this Para is not correct and denied because there is no biased with the appellants and order of incahrgheship dated 24.3.2023 is legal and lawful .Moreover the order has been issued on temporarily basis till the arrival and posting of original Head Teacher/In charge of the school which is the responsibility of the respondents to make arrangement for the school activities and official communication and this the prerogative of the respondents to assign any task within the Jurisdiction .Hence appeal in hands is infructuous and needs to be dismissed.
- c. That this Para is not Correct and denied .there is no Contradiction in the order issued by the respondent department but the appellants concealed the facts and did not agree to follow orders of the authorities and this attitude of the appellants falls within the meaning of Misconduct ,therefore the instant appeal is liable to be dismissed.
- d. That this Para is not Correct and denied. The Order of the respondent is within the contours of law and rules and justified and legal.
- e. That this para as drafted is not admitted because appellants is bound to obey order of the authorities and posting of the Head Teacher is made on the basis of promotion from SPST(Senior Primary School Teacher) and the Promotion is in Process and the Post of Head Teacher shall be filled after Promotion and ultimately in charge ship order of the appellants shall be withdrawn.
- f. That this Para needs no comments.

Keeping in view the above, it is humbly prayed that the appeal in hands may graciously be dismissed.

MOATASIM BILLAH SHAH
SECRETARY

Elementary & Secondary Education Department
Govt;of Khyber Pakhtunkhwa Peshawar
(Respondent No.1)

Samina Altaj
DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
(Respondent No.2)

DR.SHAMIM AKHTAR

District Education Officer(F) Swat
(Respondent No.3)

SHAHNAZ

Sub Divisional Education Officer(F) Charbagh Swat
(Respondent No.4)

SHAHNAZ

Sub Divisional Education Officer(F) Charbagh Swat
(Respondent No.5)

GRONDS

- a. That this part is not admitted and denied because respondent department treated the appellant in accordance with the law & rules and the Order dated 24.7.2023 is legal, justified and no violation has been made and the order is sustainable in the eye of law.
 - b. That this Part is not correct and denied because there is no bias with the appellant and order of membership dated 24.7.2023 is legal and lawful. Moreover the order has been issued on temporary basis till the arrival and posting of original Head Teacher in charge of the school which is the responsibility of the respondents to make arrangement for the school activities and official communication and this the prerogative of the respondents to assign any task within the jurisdiction. Hence appeal in hands is intraneous and needs to be dismissed.
 - c. That this Part is not correct and denied there is no contradiction in the order issued by the respondent department but the appellant concerned the facts and did not agree to follow orders of the authorities and the attitude of the appellant falls within the meaning of misconduct therefore the instant appeal is liable to be dismissed.
 - d. That this Part is not correct and denied. The Order of the respondent is within the contours of law and rules and justified and legal.
 - e. That this part as stated is not admitted because appellant is bound to obey order of the authorities and posting of the Head Teacher is made on the basis of promotion from SPJ (Senior Primary School Teacher) and the promotion is in process and the Post of Head Teacher shall be filled after promotion and ultimately in charge ship order of the appellant shall be withdrawn.
 - f. That this Part needs no comment.
- Keeping in view the above, it is humbly prayed that the appeal in hands may graciously be dismissed.

DR. SHANAZ AKHTAR
 Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Education
 (Respondent No 2)

WOMAN BILAL SHAIKH
 SECRETARY
 Elementary & Secondary Education Department
 Govt of Khyber Pakhtunkhwa Education
 (Respondent No 1)

DR. SHANAZ AKHTAR
 Sub Divisional Education Officer (Special) Chitragani Swat
 (Respondent No 4)

DR. SHANAZ AKHTAR
 Sub Divisional Education Officer (Special) Swat
 (Respondent No 3)

DR. SHANAZ AKHTAR
 Sub Divisional Education Officer (Special) Chitragani Swat
 (Respondent No 2)

**BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBERPAKHTUNKHWA PESHAWAR**

Service Appeal No. 2031/2023

Mst. Husna Bibi wife of Shahid Khan R/O Jahan Abad Tehsil Charbagh District

SwatAppellant

VERSUS

1. Secretary Education, Khyber Pakhtunkhwa at Peshawar.
2. District Education, Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (F) Swat at saidu Shareef.
4. Sub Divisional Education officer (F) Circle Charbagh Swat.
5. Assistant Sub Divisional Education officer(F) Circle Charbagh Swat

.....Respondents

AFFIDAVIT

I, Dr. Shamim Akhtar, office of the DEO (F) Swat do hereby solemnly affirm and declare that contents of the accompanying para wise comments are true and correct to the best of my knowledge and information and nothing has been concealed from this Hon; Service Tribunal.

*It is further stated on oath that in this appeal
The opposing respondents have neither been placed
ex parte nor their defence has been struck off.*

Deponent

(Dr. Shamim Akhtar)

District Education Officer (F) Swat





**OFFICE OF THE
SUB DIVISIONAL EDUCATION OFFICER(F)
CHARBAGH SWAT
AT VILLEGAE KOT TEHSIL CHARBAGH SWAT**

OFFICE ORDER

In Pursuance to the instructions of the competent authority /DEO(F) Swat as a result of Personal hearing of Mst.Husna BiBi PST GGPS Khwarpaty, held on 22.3.2023 at the office of DEO(F) swat. To Implement order of the competent authority for running of school business and activities, the undersigned is pleased to Order of **Mst.Husna BiBi PST** as **In charge** of the School /Head Teacher immediately till the arrival of PSHT for the best interest of public at large.

Note;

1. The concerned Incharge.Mst. Husna BiBi will perform her duty as in-charge of the school.
2. She will submit Monthly Gusharaa and other necessary documents/papers, signed by her regularly to the office of SDEO(F) Charbagh at Kot Charbagh.
3. She will attend official meetings falling within the Jurisdiction of Circle Charbagh without any excuse.
4. She will abide by rules & laws pertaining to Government Servants.
5. She will maintain and update all kind of school record accordingly.

**(MS. SHEHNAZ)
ASDEO(F) CIRCLE CHARBAGH
SWAT**

Endstt;No. 2208-11

Dated 24/ 3 /2023

Copy forwarded for information and necessary action to the;

1. District Education Officer (F) Swat w/r to her directions dated 22.3.2023.
2. District Monitoring Officer Swat.
3. Official Concerned, Mst.Husna BiBi GGPS Khwarpaty for strict Compliance and implementation of the order.
4. All Head Teacher GGPS in Circle Charbagh Swat.

**(MS. SHEHNAZ)
ASDEO(F) CIRCLE CHARBAGH
SWAT.**

Attested



THE ASSISTANT SUB-DIVISIONAL EDUCATION
OFFICER (Female) CHARBAGH, SWAT

No. 2167

Dated 29/9 /2022.

To,

THE HEAD MISTRESS GGPS KHWARHPATY

Subject: COMPLAINT

Meme:-

As complaint made by Chokidar today on dated 27-09-2022

At 10:50 am telephonically that

1: The school was close on 27-09-2022

2: Similay today on dated 28-09-2022 the school closed.

S.No	Name of teachr	Remarks
1	Mst Husna PST	The said teacher remained absent on 28-09-2022 and school was closed, while on 27-9-2022 she was engaged in MRM in GGPS CHARBAGH#1
2	Mst MARYAM PST	The said teacher remained absent on 27-09-2022 and 28-09-2022 and school was closed

You are directed to explain that why the school closed and you and Mst MARYAM absent without prior permission of the competent authority.

Which is a great lose of the little kids and your action in the shape of closer of school fall within the meaning of grass misconduct and breach of trust being govt servant.

You're this action tantamount grass negligence and official duty and violation of rules and regulations due to which actions needs to be taken against both of you.

You are directed to explain in written that why you remain absent and the school closed.

Your replies must reach the undersigned within two days positively.

Otherwise you well be recommended for departmentally proceeding to the competent authority which may cause of any one penalties under E&D rules 2011.

o/c
Asstt: Sub-Divisional Education Officer (Female)
Charbagh Swat.

بخدمت ASDEO زنانہ ایجوکیشن سرکل چارباغ سوات

بحوالہ کیپلینٹ نمبری 2167 مورخہ 29-09-022 ASDEO زنانہ انس سرکل چارباغ

جناب عالیہ:

مورخہ 27-09-022 کو آپ نے HRM منٹنگ کے لئے GGPS چارباغ بلا یا تھا اور اسی روز آپ نے کہا کہ کل یعنی مورخہ 28-09-022 بروز جمعہ نیشنل بینک منگور جا کر اکاؤنٹ کو PLS اکاؤنٹ میں تبدیل کرے۔ مورخہ 28-09-022 کو میں بینک مذکورہ میں اپنے ایک رشتہ دار کیساتھ بینک جا کر اکاؤنٹ کے متعلق منیجر صاحب سے معلومات اکٹھے کئے گئے اور وہ انفارمیشن جو بینک سے حاصل کی گئی وہ آپ کیساتھ WHATSAPP پر شیئر کی گئی۔ باوجود اس کے جو آپ نے کہا تھا کہ 28-09-022 کو بینک چلی جاو اور پھر غیر حاضر تصور کرنا اور Explanation بھیجنا سمجھ سے بالاتر ہے۔

1. ہم نے بار بار تحریری طور پر بھی اور زبانی طور پر بھی DEO صاحبہ زنانہ ایجوکیشن کو نوٹس میں لایا ہے کہ ASDEO سرکل چارباغ ذاتی عناد رکھ رہی ہے اور بے جا تنگ کر رہی ہے، مگر DEO صاحبہ بھی ان کے خلاف کوئی ایکشن نہیں لے رہی تاکہ ان کو ذاتی عناد سے باز رکھ سکے۔

2. اگر آپ ASDEO کا یہ رویہ نہ روکا تو ہم افسران بالا اور ہر فورم پر جا کر نوٹس میں لائے۔

3. تقریباً ایک سال سے آپ ASDEO صاحبہ نے ہمارے سکول کا وزٹ تک نہیں کیا ہے۔ ٹیچر اینڈ ٹیسر رجسٹروں اور لاگ بک گھر سے کال کر کے آپ اپنے گھر منگواتے ہیں وہاں اسی پر دستخط کر کے سکول ہذا بھیجتے ہیں۔ اور تین مہینوں سے آپ کا کوئی دستخط موجود نہیں ہے۔ رجسٹرات کی ویڈیو اور آڈیو ہمارے ساتھ بطور ثبوت موجود ہیں۔

4. حالات کے بابت ہم نے آپ کو ایک INCIDENT رپورٹ بھیجی تھی کہ چونکہ کیدار ڈیوٹی نہیں کرتا اور نہ انکے پاس بندوق موجود رہتی ہے۔ سکول کھولنے سے پہلے پہلے وہ بچوں سے جھاڑو بھی لگاتا ہے جس کے بارے میں آپ کو بار بار تحریری اور زبانی طور پر بتایا گیا مگر وہ آپ کا منظور نظر ہے جس کے وجہ سے آپ نے ان کے خلاف کوئی ایکشن نہیں لیا ہے۔ جس کی ویڈیو بھی ہمارے پاس موجود ہیں۔ اس کے علاوہ حالات میں چونکہ کیدار کا ہونا لازمی ہے۔ اور علاقہ خورٹے ایک حساس ترین علاقہ ہے۔ کیونکہ چونکہ کیدار آپ کا منظور نظر ہے۔

5. عجیب بات یہ ہے کہ آپ کیساتھ کیساتھ میں نے چونکہ کیدار سے بھی اجازت لینا پڑیگی کہ میں نے کار سرکار کی خاطر فلاں جگہ جانا ہے۔

6. اگر آپ زبانی حکم دیتی ہے اور پھر اس کے باوجود وضاحت طلب کرتی ہے تو آج کے بعد آپ جس کام کئے لیے بھی کہو گی تو ہمیں تحریری طور پر بھیجنا ہو گا ورنہ اسکی تعمیل نہیں ہوگی۔

7. علاوہ ازیں اگر آپ ASDEO صاحبہ کا یہ رویہ ہے تو میں یہاں بحیثیت انچارج مزید ڈیوٹی سرانجام نہیں دے سکتی اور یہ ذمہ داری SPST کی ہے اسے لگالے جو آپ کے "اعتماد" پر پورا اتر سکتی ہو۔

8. اپ ہی نے بنک بھیجا تھا تو آپ کو وضاحت دوں، کیوں؟
9. میں آپ کے اس ذاتی عناد کو افسران بالا کے نوٹس میں لاؤنگی، عمل درآمد نہیں ہو تو اس کے بعد ہر فورم پہ لاؤنگی۔ اگر ذاتی عناد کا اتنا شوق ہے جو کہ عرصہ دراز سے چلا رہا ہے پہلے بھی آپ نے اس طرح کا اقدام کئے ہیں اور پھر آپ نے معافی مانگ کر منت سماجت کر کے جو ہم نے افسران بالا کے نوٹس میں نہیں لایا ہے۔ تو پھر کھل کر بتادے نوکری کے بل بوتے پر کوئی اس طرح نہیں کرتی۔ خود ڈر کا مارے خوڑ پٹے اور اسی طرح کے پہاڑی سکولوں میں جا نہیں سکتی اور دوسروں کے لئے بلا وجہ مسائل پیدا کرتی ہے۔ اور اسی سکول میں دو مہینے سے مانیٹرنگ والے ڈیوٹی چھوڑ چکے ہیں۔ ہم دو ٹیچرز ہیں اور ہم نے 30 ہزار میں ایک گاڑی بک کی ہوئی ہے ہم سکول جائے یا نہ جائے مگر ان کو پیسے دیتے ہیں تو پھر ہم سکول کیوں نہ جائے۔ اور جن سکولوں میں استائیاں نہیں جاتی وہ بھی آپ کو پتہ ہے ان کو اج تک آپ نے نہ وضاحت طلبی بھیجی ہے اور نہ ہی کچھ اور، کیونکہ رشتہ داریاں اور تعلق نبھانا پڑتا ہے۔




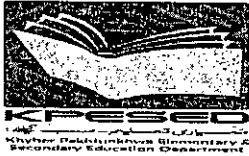
مس حسنی بی بی PST

گورنمنٹ گرلز پرائمری سکول خوڑ پٹے

کاپی برائے اطلاع یابی:

1. جناب کمشنر صاحب ملاکنڈ
2. جناب ڈپٹی کمشنر صاحب ملاکنڈ
3. جناب سیکرٹری ایجوکیشن کے پی کے۔
4. جناب ڈائریکٹر ایجوکیشن کے پی کے۔
5. محترمہ DEO صاحبہ زنانہ سوات
6. جناب ڈسٹرکٹ مانیٹرنگ افسر سوات
7. جناب چیرمین سیفٹی کمیشن سوات

Atthar




D

(9)

**SUB DIVISION CHARBAGH
CIRCLE OFFICE
AT GGPS KOT CHARBAGH SWAT.**

No. 2187 /Explanation Dated 24/2/2023

To

**HEAD TEACHER
GGPS KHWARPATY.**

Subject; **EXPLANATION**

Memo;

On line School data required for onward submission to the quarter concerned for which all school Heads were informed about the data and a link was also shared with the Head Teachers including you but during the scrutiny it was pointed out that you submitted wrong data beyond the factual and actual status due to which information could not be sent to the quarter concerned well in time.

To stream line, the information and correctness of data, a meeting was also called on 22.2.2023 at GGPS Charbagh No.1 where you and your another staff member failed to attend the meeting and remained absent which resulted delay in submission of data due to your negligence and noncompliance of the order of meeting and such like behavior falls within the meaning of MISCONDUCT under the E&D Rules 2011 and why action may not be taken against you according to the rules.

In this connection you are strictly directed to explain that why you remain absent and failed to submit data according to the prescribed format, shared in WhatsApp group.

Your reply must be reach to the Circle Officer within THREE DAYS Positively, otherwise departmental Proceedings shall be initiated accordingly.


(MS. SHEHNAZ)

ASDEO (F),M.C CIRCLE CHARBAGH

Copy To;

1. District Education Officer (F) Swat


(MS. SHEHNAZ)

ASDEO (F),M.C CIRCLE CHARBAGH

Attended


بخدمت SDEO سرکل چارباہی زندانہ سوات

جواب طلبی بحوالہ Explanation/2197 مورخہ 28-02-2023

معروض خدمت ہوں کہ آپ نے Explanation میں یہ واضح کیا ہے کہ میں نے حقیقت کے برعکس غلط ڈیٹا دیا ہے۔ میں نے کونسا غلط ڈیٹا دیا ہے؟ آپ نے واضح نہیں کیا ہے میں نے جو ڈیٹا دیا ہے وہ بالکل صحیح ہے۔ اگر غلط ہے تو آپ کو چاہئے تھا کہ اس کی نشاندہی کر لیتی۔

علاوہ ازیں آپ نے بزرگیہ واٹس ایپ جس غلطی کی نشاندہی کی ہے وہ پرو فارمہ میں صرف خواتین پی ٹی سی ممبرز کے موبائل نمبرز کا ہے۔ پی ٹی سی ممبرز علاقہ خوڑپے سے تعلق رکھتے ہیں جہاں بجلی نام کی کوئی چیز موجود نہیں۔ پہاڑی اور ناخواندہ خواتین ہونے کے وجہ سے ہو سکتا ہے ان کے پاس موبائل فون نمبرات نہ ہو یا وہ دینا نہیں چاہتے ہو۔ مگر کافی کوشش اور بار بار ان کے پاس چوکیدار کو بھیجا کیونکہ وہ انکی فیملی کا ہے مگر انہوں نے موبائل نمبرات نہیں دیئے۔ اور چاہئے تھا کہ جس وقت یہ پی ٹی سی بن رہی تھی اس وقت ان سے نمبرات لیکر رجسٹر میں انٹری کر لیتے تو آج یہ نو برت نہیں آتی۔ اگر پھر بھی ان سے زبردستی لینا ہے تو پولیس فورس کو ہمارے ساتھ بھیج دے تاکہ وہ ان سے وصول کر سکے۔ ساری یہ کہتی ہیں کہ ہمارے پاس موبائل فون موجود نہیں تو میں کہاں سے دوں۔ پھر بھی اب ہم نے ان کے فیملی ممبران کے نمبرات حاصل کئے ہیں لیکن ان کے خود کے نمبرات نہیں ہیں۔

دوسری بات میٹنگ اٹینڈ نہ کرنے کی ہے تو مورخہ 10 اور 11 فروری 2023 کو ایک غیر نوٹیفائیڈ میٹنگ ان رجسٹرات کے متعلق رکھا گیا تھا جو کہ میں نے اٹینڈ کر کے چونکہ میرے ساتھ میرا چھوٹا بچہ تھا اور اسی بچے کے وجہ سے مجھے اس غیر نوٹیفائیڈ میٹنگ سے باہر کر دیا تھا کہ جس کے پاس بچہ ہو گا وہ اس میٹنگ میں نہیں جھینسی گی۔ میرا شوہر پولیس ڈیپارٹمنٹ میں ہے اور میرے گھر میں میرے صرف 5/4 سال کے دو بچے ہیں تو میں اسے کیوں پھرڑے کے اوں؟ اسی وجہ سے مورخہ 02-02-22 کی میٹنگ میں نہ اسکی اور اپنے ساتھ دوسری ٹیچر مریم کو کہا کہ آپ نے کورہ والا میٹنگ اٹینڈ کرے تو انہوں نے کہا کہ یہ انچارج کا کام ہے میں نہیں جاسکتی۔ اور آپ کا میٹنگ صرف اسی لئے تھا کہ استانیوں کو ایکسپل کال ٹاٹریفکٹ بنا دیا جائے تاکہ وہ تیار ڈیٹا بھیج دیا کرے۔ ہمارا کام پڑھانا ہے ہم کمپیوٹر اپریٹر نہیں ہے اس کے لئے آپ کے پاس کلرکس اسٹاف موجود ہے آپ ان سے کام لیا کرے۔

تیسری بات یہ ہے کہ کیا اسی میٹنگ پورے سرکل کی ٹیچرز موجود تھیں؟ نہیں تھی تو پھر میرے خلاف Explanation کیوں؟ میرا والا Explanation گروپ میں شہر کیا گیا ہے۔ باقی ٹیچرز کا کوئی Explanation نہیں ہے۔ حالانکہ اس میں باقی استانیاں بھی نہیں تھیں۔ ورنہ سب کے نوٹس اور CDRI کال ریکارڈ نکلو الے تو پھر لگ پتہ جاگا کہ کون کون موجود نہیں تھیں۔ اسی طرح 12/11 فروری کے غیر نوٹیفائیڈ میٹنگ میں بھی سارے استانیوں کا کال ڈیٹا چیک کرے تاکہ پتہ چل جائے کہ اس میں کتنے استانیاں موجود نہیں تھیں؟ کیا ان سے جواب طلبی کی گئی ہے؟ نہیں جی کیونکہ میرے ساتھ ذاتی عداوت موجود ہے۔

Attest
[Signature]

یہ Explanation میرے سابقہ Explanation کے جواب میں بدینتی، سابقہ عناد پر مبنی ہے حالانکہ ہیڈ ٹیچر کی سیٹ مجھے جبراً اور دھوکے سے دیا گیا تھا کہ آپ چند مہینے عارضی طور پر سنبھال لے پھر اس کے لئے سینئر ٹیچر مہیا کر دیں گے، حالانکہ کئی سال گزرنے کے باوجود بی کوئی سینئر ٹیچر مہیا نہیں کی گئی اور میں نے بار بار کہا کہ میں بحیثیت انچارج اس سیٹ کو بوجہ ایس ڈی ای او شہناز کے نہیں کر سکتی۔ پہلے بھی کہہ چکی ہوں کہ ان کا میرے ساتھ روڈ یہ ٹھیک نہیں ہے اور سابق دل بدی موجود ہے جس کے وجہ سے یہ بار بار میرے خلاف کوئی نہ کوئی بہانہ بنا دیتی ہے۔

لہذا قانون کے مطابق SPST مہیا کر دے یا دوسری استانی کو حوالہ کر دے تاکہ مجھے ان سے چھٹکارا مل جائے، میں ان کے ان Explanation سے تنگ اچکی ہوں۔ یہ مجھے حراساں کر رہی ہے تاکہ میں یہ نوکری چھوڑ دوں۔ ڈی ای او صاحبہ بھی بار بار اس چیز کا نظر انداز کر رہی ہے۔ اگر یہ سلسلہ نہ رکھا تو میں اس حراسگی کے خلاف پریس کانفرنس کرونگی۔ میرے پاس اور کوئی راستہ نہیں بچا ہے۔



مس حسنا بی بی PST گورنمنٹ گریڈ پرائمری سکول

خوڑپٹے چارباغ سوات

کاپی برائے اعلیٰ عیالی:

- 1- جناب کمشنر صاحب ملاکنڈ
- 2- جناب سیکرٹری ایجوکیشن KPK
- 3- جناب ڈائریکٹر ایجوکیشن KPK
- 4- جناب ڈپٹی کمشنر سوات
- 5- ڈسٹرکٹ ایجوکیشن افسر سوات
- 6- جناب ڈسٹرکٹ مانیٹرنگ افسر سوات
- 7- جناب چیرمین ہیومن رائٹس KPK
- 8- جناب چیرمین پریس کلب سوات



DR
12



OFFICE OF THE
DISTRICT EDUCATION OFFICER (Female) SWAT

F: (0946) 9240214

(0946) 9240214

Email: deofswat@gmail.com

www.female.sed.edu.pk

No. _____

Dated ____ / ____ / 2023

To,

Mst: Husna Bibi PST
GGPS Khwarpatay (Charbagh)

Subject; PERSONAL HEARING UNDER RULE-15 OF THE E&D RULES 2011

Memo;

In the light of report submitted by ASDEO (F) Charbagh vide No. 2204/GGPS Khwarpatay/Inquiry dated: 10-03-2023 according to which you have used harsh language in your correspondences & also absent in a meeting concerning with data collection. You are directed to attend Formal hearing on 22-03-2023 02:00 PM at the office of the undersigned in person along with original CNIC, and photocopies of the correspondence made with concerned SDEO/ASDEO.

If you failed to attend the office of the DEO (F) Swat on the mentioned Date you will be proceeded accordingly.

(Dr. SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER (F)
SWAT

No. 2053 P.F/Husna Bibi /PST /KhwarPatay

Dated 20/3/2023

Copy for information /necessary action to

1. SDEO/ASDEO (F) Charbagh, with the directions to attend office of the DEO (F) Swat on above mentioned date & time further you are directed to inform the official concerned well on time.

[Signature]
DISTRICT EDUCATION OFFICER (F)
SWAT

Attend
[Signature]

9 (13)



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWAT
AT SIADU SHARIF.



PHONE/FAX 9240414 E-Mail deofswat@gmail.com
<https://www.facebook.com/deofsw> <http://female.sed.edu.pk>

File No:8546 / Non-T/Staff September,2023 Charbagh

Dated 06-10-2023

Show-cause Notice for Salary Deduction

I, DEO SWAT FEMALE as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby serve upon the following Non-Teaching staff.

S: No	EMIS Code	Name of School	Monitoring Date	Full Name	Desg:	Personal No.	CNIC	Absent Days	Visit Type
1.	39146	GGPS KHWARDATAI	2023-09-16 08:22:04	Maryum	PST	956383	1560203319804	1	Regular
2.	39146	GGPS KHWARDATAI	2023-09-16 08:22:04	Husna Bibi	PST	00924215	1560251646486	1	Regular
3.	39150	GGPS SHAHBUDDIN M	2023-09-11 08:03:38	TAHIRA BILAND	PSHT	68236	1560202477198	1	Regular
4.	39150	GGPS SHAHBUDDIN M	2023-09-11 08:03:38	laila khan	PST	00908928	1560706069074	1	Regular

This show cause as follows.

1. That as per IMU monitoring report you were found absent from duty on the date mentioned against each without prior permission of the competent authority.
2. And that as per the material and other connected papers on record under Rule-5 (i) (a) and to dispense with the inquiry in accordance with Rule-7 of the aforementioned rules, I, the competent authority, am satisfied that you have committed acts/omissions specified in Rule-3 (d) i.e. "guilty of habitually absenting himself from duty without prior approval of leave".
3. Now, therefore, I as the Competent Authority have tentatively decided to deduct one-day salary in accordance with Rule-4 (a) (iii) and the Finance Department Notification No. So (FR)/FD/5-14/2014 dated 16-12-2014.
4. You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this show cause is received within 7 days of its delivery, it shall be presumed that you have no defense to put in and in that case an Ex-Parte decision shall be taken against you.

(Dr. Shamim Akhtar)
District Education Officer (Female)
Swat at Saidu

Endst: Even No. & Date

Copy of the above is forwarded to the: -

1. Director, Elementary & Secondary Education Department, G T Road, Peshawar
2. Deputy Commissioner concerned
3. District Monitoring Officer concerned
4. SDEO female charbagh.
5. Teacher concerned.
6. Master File

Dr. Shamim Akhtar
District Education Officer (Female)
Swat

SUBJECT:
 ISSUE:
 DATE/Time:

DSC Meeting for the month of June, 2023
 Committee Room, Deputy Commissioner Office, Swat
 25th July, 2023, 11:00 AM

MEMBERS (In ATTENDANCE)

1. Sohail Khan, Additional Deputy Commissioner, Swat (In Chair)
2. Riaz Ali Khan, DMO EMA, Swat
3. Fazal Khaliq, DDEO Male, Swat
4. Shamim Akhtar, DEO Female, Swat
5. Talat Shah, DPO, EEF Swat
6. SDEOs (M/F), Swat
7. ASDEOs (M/F), Swat
8. Najeeb Ullah, CO EMA, Swat
9. Nasir Khan, CO EMA, Swat
10. Said Ghani, CO DEO Male office, Swat
11. Amjad Ali, CO DEO Female Office, Swat

The meeting started with recitation from the Holy Quran. Opening the discussion, the chair welcomed the participants and invited DMO to highlight the agenda items. The agenda items were thread barely discussed and decisions taken as follows:

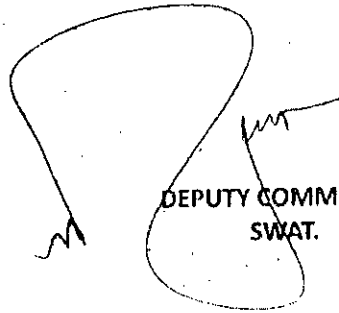
S.No.	Issue/Agenda Item	Brief description	Decision	Timeline	Action to be Taken
1	Progress Review	Decisions taken in the previous meeting were reviewed.	The Chair stressed upon the participants to implement the decisions arrived at in the meeting in letter and spirit.	Accordingly	DEO (M/F)
2.	Teaching & Non-Teaching Staff un-authorized Absenteeism	Action taken by DEO (M/F) in form of warnings and deductions.	It was decided that DEO (M/F) will initiate actions on EMA reports immediately after completion of each month and will share finalized consolidated list duly verified from DAO along with source challans with DMO Office before the next DSC.	At least 7 days prior to the DSC Meeting.	DEO (M/F)
3.	Temporary Closed Schools	Temporary closed schools were discussed for the month of June, 2023.	It was decided by Chair that one day salary will be deducted from the teaching staff of closed schools and directed that three days salary should be deducted in case of repetition. DEO (M/F) should keep such schools at their watch list.	At least 7 days prior to the DSC Meeting.	DEO (M/F)
4	Administrative Visits	Administrative visits for male schools were 48% and for Female schools were 35%.	The chair appreciated DEO (M) for achieving the target and advised DEO Female to enhance the visits.	Monthly	DEO(M/F)
5	Missing Facilities:	Lists of schools where <u>Electricity, Water, Toilets and</u>	The Chair directed DEO (M/F) to closely look into the schools where basic	Next meeting	DEO(M/F)

Handwritten signature

		were shared with DEOs.	direct Head Teachers/principals to functionalize the same in PTC fund if available. Progress will be review in next meeting.		
6	PTC Meetings	List of schools were shared with DEO (M/F) where PTC Meetings were not conducted.	The chair showed great concern for not conducting PTC meetings in the specified schools. The chair directed DEOs to ensure monthly meetings of PTCs on regular basis.	Monthly	DEO(M/F)
7	GCS Reports	List of absent teachers were shared with DPO EEF. Deductions have been made by DPO EEF from the concerned absent teachers.	DPO EEF shall take steps to improve performance of GCS schools.	Next DSC	Program Officer, EEF

15

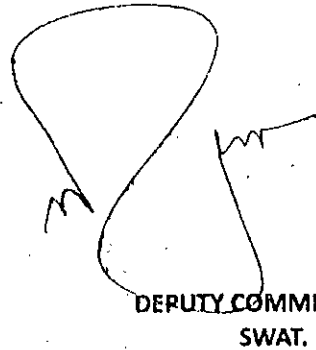
The meeting ended with a vote of thanks to and from the chair.


DEPUTY COMMISSIONER,
SWAT.

No: 20335-43

1. Director General, EMA E&SE Department, Khyber Pakhtunkhwa.
2. District Monitoring Officer, EMA, Swat.
3. District Education officer (Male), Swat.
4. District Education officer (Female), Swat.
5. Addl Deputy Commissioner (F& P), Swat.
6. PS to Commissioner, Malakand Division, Saidu Sharif.
7. XEN, C&W, Swat.
8. District Accounts officer, Swat.
9. DPO, EEF, Swat.




DEPUTY COMMISSIONER,
SWAT.



**PAYROLL SYSTEM
AMENDMENT FORM
MULTIPLE EMPLOYEE ENTRY**

D 16

FORM: PAY03

OFFICE OF THE
FOR THE MONTH OF 10 / 2023
Sub Divisional Education Officer (Female) Charbagh Swat

Date: _____
Page No. _____

DDO Code (Cost Center)

S	W	6	4	2	0
---	---	---	---	---	---

 SDEO(F) Charbagh swat

IMU

EMPLOYEE DETAILS																	
Employee Number			Employee Name			NIC Number		Info Type	GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS				Stop Sal	Effective Date	Remarks
									Field ID	New Contents	Wedge Type	Amount					
											Rupees	Paisa	Adj				
		924215	Husnba PST GGPS Khwar Pattey		15602-7979368-9				ROP 3 Day		4757				start	1/10/2023	Absent from duty reported by IMU
		956383	Maryam Hussain PST -- do		15602-0331980-4				ROP 3 Day		4811					1/10/2023	Absent from duty reported by IMU
		6-236	Fahima Bilal and GGPS H PST Wanda (Wanda Khan)		15602-0247719-8				ROP 3 Day		10234					1/11/2023	Absent from duty reported by IMU
		908928	Laila Khan --do--		15607-0606907-54				ROP 3Day		5024					1/12/2023	Absent from duty reported by IMU
		813689	Mehnaz PST GGPS toor tooth		1602-7711717-8				ROP 1 Day		1915					1/13/2023	PTC Minutes not show
		791714	Najma PST-12 --do--		15602-6546541-8				ROP 1 Day		1915					1/13/2023	PTC Minutes not show

Prepared By
[Signature]
Sub. Div. Edu. Officer (F)
Tehsil Charbagh Swat

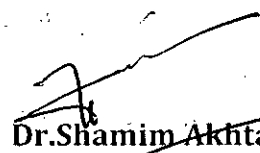
Audited / Checked By _____

Entered / Verified By *[Signature]*

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FE-MALE)
SWAT.**

AUTHORITY LETTER

I Dr.Shamim Akhtar District Education officer (female) Swat do hereby authorized Mr.Jan Muhammad Assistant Office of the district Education for submission of Joint Parawise Comments is **Service Appeal No.2031/2023 Case Titled Mst. Husna Bibi PST BPS-12** Fixed for hearing on 04/01/2024 hence, and authority letter is hereby issued in favor of the above-named officer.


Dr.Shamim Akhtar
District Education Officer (F) Swat