

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

**Service Appeal # 2314/2023**

**Mst. Nagina Bibi, SDEO .....Appellant.**

**VERSUS**

**Govt: of Khyber Pakhtunkhwa & others.....Respondents.**

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**Deponent**

*19-02-2024  
Peshawar*

**BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR**

**Service Appeal # 2314/2023**

**Mst. Nagina Bibi, SDEO ..... Appellant**

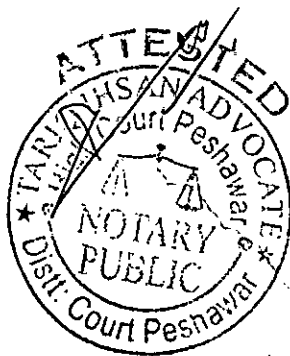
**VERSUS**

**Govt. of Khyber Pakhtunkhwa & others..... Respondents**

**AFFIDAVIT**

I, **Masood Ahmad**, Secretary, Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

**It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.**



A handwritten signature in black ink, appearing to be "Masood Ahmad".

**(Masood Ahmad)  
Secretary  
E&SE Department Peshawar**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

**AUTHORITY LETTER**

It is certified that **Mr. Amjad Ali, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar **Service Appeal# 2314/2023 Case Titled Mst. Nagina BiBi vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.**

(Masood Ahmad)

**Secretary**

**E&SE Department Peshawar**

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

**In Service Appeal No. 2314/2023**

**Mst. Nagina Bibi .....Appellant**

**VERSUS**

**Chief Secretary to Govt of KPK Peshawar..... Respondents.**

**PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 01, 02**

**Respectfully Sheweth,**

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 11099

**Preliminary Objections:**

1. That the appellant has already completed her normal tenure on the said station, hence the appeal is not maintainable.
2. That the Respondent has adopted the proper law and procedure by exercising powers u/s 10 of Civil Servant Act, 1973, which is as under:-

**“10. Posting/Transfer every civil servant shall be liable to serve anywhere within or outside the Province in any post under the Federal Government, or any Provincial Government or local authority, or a corporation or body set up or established by any such Government.**

**Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region:**

**Provided further that where a civil servant is required to serve in a post outside his service or cadre, his terms and conditions of service as to his pay shall not be less favorable than those to which he would have been entitled if he had not been so required to serve”**

In light of Section-10, desired posting is not the perpetual right of a civil servant and the department concerned can transfer any civil servant to serve at the given place as mentioned in the transfer/posting order, while the civil servant cannot refuse compliance. *govt order / notifications.*

3. That according to Central Administrative Tribunal-Delhi in the case of Sh. Jawahar Thakur-vs-Union of India held on 19<sup>th</sup> June, 2015 that it is more than stare decisis that **“transfer is an incidence of service and it is for the executive/administration to decide how to and where to use its employees subject to the conditions of their appointment in the best interest of the organization and public service”** It is not always possible and feasible to record strong reasons for allowing an officer to continue at a particular station for a few years or more or less.
4. The Honorable Supreme Court in Mrs. Shilpis Bose and Others vs State of Bihar and others 1991 Supp.(2)SCC-659 went into in the issue of guidelines and has upheld the authority of the employees to transfer the employee in the following words:-

**“In our opinion, the Courts should not interfere with a transfer order which are made in public interest and for administrative reasons (unless the transfer orders are made in violation of any mandatory statutory rule or on the ground of mala fid. A Government servant holding a transferable post has no vested right to remain posted at one place or the other, he is liable to be transferred from one place to the other. Transfer orders issued by the competent authority do not violated any of his legal rights. Even if a transfer order is passed in violation of executive instructions or orders, the Courts ordinarily should not interfere with the order instead affected party should approach the higher authorities in the Department. If the Courts continue to interfere with day to day transfer orders issued by the Government and its subordinate authorities, there will be complete chaos in the Administration which would not be conducive to public interest. The High Court over looked these aspects in interfering with the transfer orders”**

Therefore, in light of the above sititation the present appeal is not maintainable and liable to be dismissed with costs.

5. The appellant has not come to this Tribunal with clean hands.
6. The appellant is not an aggrieved person nor has any locus standi to file the present appeal.
7. That the appellant has concealed material facts from this Tribunal.
8. That the appellant is estopped by her own conduct to file the present appeal. There are various complaints against the appellant regarding her plenty of absentees without prior permission or leave, un-seriousness towards her official duties, unprofessional way of official correspondence, willfully absentees from important meetings, not explaining her position to high-ups in various explanation called by the competent authority and above the all badly effecting the sub division and department.
9. That the present appeal is against the prevailing law and rules.
10. That the appellant is not entitled for any relief, she has sought from this Honorable Tribunal.
11. That the present appeal is liable to be dismissed being devoid of any merits.
12. That the present appeal is hopeless time barred, hence liable to be dismissed.
13. That the present appeal is just filed by the appellant to pressurized the respondents for getting illegal in unlawful benefits.
14. That the appellant is just wasting the precious time of this Honorable Tribunal through the instant frivolous appeal.

15. In an another famous case, The State of U.P. and Others vs Goverdhan Lal, : 2004 (3) SLJ 244 (SC) it has been held this:-

**“It is too late in the day for any Government servant to contend that once appointed or posted in a particular place or position, he should continue in such place or position as long as he desires. Transfer of a but also implicit as an essential condition of service in the absence of any specific indication to the contra, in the law governing or conditions of service”**

**Reply on Facts.**

1. Pertains to record.
2. Pertains to record.
3. Incorrect the career of the appellant is full of complaints and irregularities which shows no devotion and zero hard work on the part of the appellant. Moreover, the competent authority has initiated proceedings against the appellant in respect of her misconducts which disciplinary proceedings are under process (**Copies of complaints are Annex-A**) Furthermore, for recovering the damage caused to be sub-division the services of the appellant was replaced by another competent officer in the public interest. In this regard case law with the title Laxmi Narain Mehar vs UOI & Ors, JT 1997 (1) 24 Page 460, Honorable Supreme Court of India viewed that in view of the express indication for need of experienced staff at the respective places, the transfer order cannot be said to be arbitrary. Therefore, the present appeal is liable to be dismissed in limine.
4. Pertains to record.
5. Pertains to record.
6. Incorrect, transfer and posting is a part of service and the order dated 11-01-2022 was in accordance with law which was dismissed by this Honorable Tribunal and the same is past and closed transaction.
7. Correct, the appeal against order dated 11-01-2022 was dismissed by this Honorable Tribunal.
8. Incorrect, posting/transfer is a part of service & the appellant is in the same district but with new assignments. According to section(10) desired posting is not the perpetual right of a civil servant and the department concerned can transfer any civil servant to serve at the given place as mentioned in the transfer/posting order, while the civil servant cannot refuse its compliance. Furthermore the appellant was not performing her duties in public interest and remained unserious towards her office. There are several complaint against the appellant. There are various complaints against the appellant regarding her plenty of absentees without prior permission or leave, unseriousness towards her official duties, unprofessional way of official correspondence, willfully absentees from important meetings, not explaining her position to high-ups in various explanation called by the competent authority and above the all badly effecting the sub division and department. (**Copy of the complaints are Annex-B**)
9. Pertains to record.
10. Incorrect, alongwith all the grounds of appeal.

**On Grounds:**

- A. Incorrect, posting/transfer is a part of service and is not a vested right of a civil servant, so there is no violation of constitution on the part of respondent.
- B. Incorrect, the order dated 02-08-2023 is in accordance with law.
- C. Incorrect, the respondent has acted in proper and just way to achieve best interest of the public.
- D. Incorrect, the posting/transfer of the appellant is in accordance with law, rules and in the best public interest.
- E. Incorrect, the transfer order is in accordance with law, the appellant has completed her tenure and the present appeal is meritless, hence liable to be dismissed.
- F. Incorrect, there is no illegality in the transfer order dated 02-08-2023 but indeed the services of the appellant has been given to the same District Education Officer (Female) with new assignments in the large interest of public. Moreover, the appellant has been remained in the same district for more than 10 years however, the transfer of the appellant in the same district was issued in light of ban on posting to other district by the Honorable Chief Minister.
- G. Incorrect, no legal action has been taken against the appellant which needs any kind of inquiry procedure till now and as for as the order dated 02-08-2023 is concern it is a transfer order u/s 10 Civil Servant Act, 1973 which is a part of service in rotten. Furthermore, there are various misconduct on the part of appellant for which legal action according to procedure is under process.
- H. Incorrect, no punishment as per rules has been given to the appellant through transfer/posting order dated 02-08-2023 which needs proper proceedings/inquiry.
- I. Incorrect, the appellant has been treated in accordance with law and no vested right of the appellant has been violated.
- J. Incorrect, transfer/posting is part of service and it is the mandate of competent authority u/s 10 of Civil Servant Act, 1973 to place the services of a civil servant anywhere.
- K. The respondents seeks permission for advancing additional points at the time of arguments with humble submission that the appeal is not maintainable and is liable to be dismissed summarily.

**It is therefore, most humbly submitted that the appeal being devoid of any merits may kindly be dismissed with cost.**



**(Masood Ahmad)**

**SECRETARY**

**Elementary & Secondary Education,  
Department (Respondent No. 01 & 02)**



(5) Amaktee (C) (13)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9210626

Dated: 02- August- 2023

**NOTIFICATION**

NO:SO(MC)E&SED/4-16/2023/Posting/Transfer/SDEO/Haripur Keeping in view of administrative grounds, and complaint filed by District Education Officer (Female) Haripur, Mst. Nagina Bibi. SDEO (Female) Khanpur District Haripur is hereby transferred and directed to report to District Education Officer (Female) Haripur, with immediate effect, in the best public interest.

2. No TA/DA is allowed.

**SECRETARY TO THE GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

Endst: of even No.& date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officer (Female) Haripur.
5. District Accounts Officer Haripur.
6. PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officer concerned.
9. Master file.

11/1/2023  
(IMRAN ZAMAN) 2/8/2023  
SECTION OFFICER (Management Cadre)

11/1/2023  
Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa



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Diary No. 3418-P-WE

Dated:- 07-08-2023

To  
The Worthy Chief Secretary,  
Govt of Khyber Pakhtunkhwa  
Civil Secretariat, Peshawar.

Subject:- APPEAL FOR CANCELLATION/WITHDRAWN of NOTIFICATION OF TRANSFER and TAKING NECESSARY ACTIONS AGAINST MALAFIDE PRACTICES/ILLEGAL ACTIVITIES OF Mst. SADIA AZIZ, DEO(F), DISTRICT HARIPUR.

Reverend Sir,

Reference Corrigendum vide No. SO(S/F)E&SED/4-16/2021/POSTING/TRANSFERS/MC: Dated Peshawar the, October 26<sup>th</sup>, 2021 Issued from Secretary E&SE KPK Department. I, Mrs. Nageena Bibi W/O Mr. Syed Abbas Hussain Shah working as SDEO (F), Tehsil Khanpur Distt: Haripur since 27<sup>th</sup>, October 2022. but It was found astonishingly that after two months a Notification vide No. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC dated the January 11<sup>th</sup>, 2022 has been issued in which I was transferred at Tehsil Pabbi District Nowshera. After that I got stay order from service tribunal, Peshawar and said order cancelled in the light of court case (copy attached as Annex.A).

1. Respected Sir, With due respect,

Now I, want to brief malafide practices/illegal activities of Mst. Sadia Aziz DEO(F), District Haripur for necessary actions which are as follows:-

- i. That, she wrote an official letter for return back of Govt vehicle No. A-1120 to DEO(F) office vide letter No.299 dated 11-01-2022 but undersigned verbally refused and wrote a letter vide No.942 dated 15-12-2021 to District Transport Office, Motor vehicle Examiner, District Haripur for its Examine then in return, said department sent letter vide letter No.269-272/21 dated 21-12-2021 showing detailed report of Assessment of said vehicle as it is in condom condition, then the undersigned done its all mechanical work for running of smooth official work. (Copy is attached as Anx: B,C,D,E for reference).
- ii. That, she again wrote a letter vide No.6430 dated 23-08-2022 for return of above said Govt vehicle No.A-1120 o/o SDEO(F), Tehsil Khanpur to DEO(F) office illegally and then the undersigned had returned the said vehicle to DEO(F) vide letter No. 386 dated 24-08-2022. (copy attached as Annex.F,G).
- iii. That, she again wrote a letter vide No. 6448 dated 23-08-22 to Motor Vehicle Examiner, Haripur. for physically inspection of vehicle Suzuki van.No.A-1120 and in response of this letter, reply received vide letter No. 347-350/22 dated 29-08-2022 from Motor Vehicle Examiner stated that the current state of vehicle is normally Fit. Now she handed over the said vehicle to SDEO Ghazi. (Copy attached)
- IV. That, she has called an explanation vide letter No.2841 dated 30-04-2022 and vide No.2984 dated 09-05-2022 on the basis of FIR lodged by head teacher, GGPS,Choi, Tehsil Khanpur through application to SHO, Khanpur directly without intimation and the undersigned was on authorized c.leave on that day (copies of Explanations and reply of Explanation along FIR and other supporting documents attached as Anx:H,I,J,K,L).
- V. That she visited office of the SDEO(F), Tehsil Khanpur on 22-03-2022 and write note on attendance register showing that Absent days of ASDEO(F) marked as C. Leaves (more than two leaves) in a month and she also cross my surprise visits on the attendance register and log book of GGPS Khanpur No.2 which is illegal practice. (copies of attendance register o/o SDEO(F) and attendance register and visitor book of said school attached as Anx:M,N,O,P).

11/8/23  
Section Officer (Management Cadre)  
Elementary & Secondary Education  
Govt. of K.P.

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- (16)
- ) which is illegal practice. (copies of attendance register o/o SDEO(F) and attendance register and visitor book of said school attached as Anx:M,N,O,P).
- VI. That DEO(F) has also called absent notice vide letter No. 6378 dated 22-8-2022 but the undersigned was on surprise visit at GGPS Khanpur No.2 and GGPS Pind Gujran on that day i.e 20-08-2022. (copies of absent notice, Attendance Register And visitor book of school attached as Q,R,S,T) And in above absent notice she bound me to attend DEO(F) office on Friday and Saturday also.
- VII. That she has also called explanation vide letter No.6573 dated 27-08-2022 as the undersigned has already been send reply to DEO(F) Office vide letter No. 114 dated 17-03-2022 regarding functionalized the newly established school but she DEO(F) again wrote a letter vide letter No. 6398 dated 22-08-2022 about it. (copy of Explanation, official letter attached as Anxx. U,V,W).
- VIII. That the undersigned forwarded an application of GGPS Kot Jandan school to DEO(F) for necessary action please on urgent basis, on that she also called an explanation vide letter NO.5863 dated 25-07-2022. (Copy of application and explanation attached as Anx.X,Y,Z).
- IX. That she has issued an official letter vide No. 6447 dated 23-08-2022 for internal Audit of Accounts last 03 Years o/o SDEO(F) Khanpur on 24-08-2022 and after doing it she made audit objectionable Paras vide letter No.6480-83 dated 24-08-2022 and published in daily AJJ Akhbar Abbottabad regarding false news of corruption on dated 29-08-2022, but even in the month of July 2022, From AG office all audit of account matters has been cleared. (Copies of letter, audit paras, news paper cutting and cash book attached)
- X. That, two male SSTs Teachers are working on main posts of ADEO (F)(Primary) and ADEO P&D at DEO(F) Office which harras female teachers in female office creating mental stress for every female teacher.
- XI. That, in spite of all the above, undersigned worked with secondary Estab. For Pre-DSC in connection with Appointments of PET, DM, AT, TT & QARIA through ETEA 2021 vide letter No.5861 dated 25-07-2022 and also with primary Estab. Vide letter No.6441 dated 17-08-2022 for Pre-DSC meeting for Appointment of PST against open merit and disable quota 2021-22 through ETEA (copy of letters is attached). She also issued Notification vide letter No. 2552-55 dated 16-04-2022 regarding to visit high and higher schools on daily basis as per schedule attached which are not our job description (copies attached).
- XII. That, she has been issued an official letter No.6889 dated 03-09-2022 to the undersigned regarding Account matters that no any account transactions will be made without her approval. (copy attached)
- XIII. That, she bound the undersigned to sit in DEO(F) Office from 9:00-4:00 Pm without any official task and forcefully marked attendance on DEO attendance register. (Copy attached)
- XIV. That she has issued absent notice vide letter No.6989 dated 06-09-2022 to the undersigned as I was on field visit at GGPS Dara Dada Shaheed and then in office for official work and submitted reply along proofs but it made me mentally pressurized (Copy attached)
- XV. That she has Endorse a letter vide No. 1608-10 dated 7-09-2022 and 7119 dated 08-09-2022 District Account Officer, Haripur and The Bank Manager, NBP, TIP Branch, Haripur regarding shifting of DDO ship without any allegations and inquiry by using her illegal power (Copy attached)
- XVI. That she has submitted complaints to Worthy Secretary, E&SE KPK Peshawar and issued a Notification vide No. SO (MC)/4-17/E&SED/INQUIRY/2022 Dated sep.5,2022 regarding to conduct a fact finding inquiry against SDEO(F) Khanpur. (Copy attached)

11/1/2023

Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa

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2. Furthermore, In INTRA-DISTRICT PERFORMANCE SCORE CARD QUALITY, DISTRICT HARIPUR for the month of December, 2021 Tehsil Khanpur has got 1<sup>st</sup> Position among all tehsils of Haripur. Along it, both circles of Tehsil Khanpur got 1<sup>st</sup> position which shows highly efficiency of the undersigned: (Copies of certificates attached).

From all the above mentioned facts, Mst. Sadia Aziz, DEO(F), Haripur mis use her illegal powers and malafide practices due to personal grudges to me creating mentally pressure and harassment to the undersigned day to day and time to time.

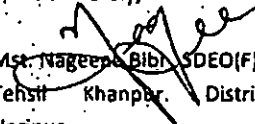
Respected Sir, with due respect, You are humbly requested to take necessary action in this regard and also direct her to do every official work under rules and policy and create calm environment for others in the best interest of public please.

I shall be very thankful to you for your kind consideration:

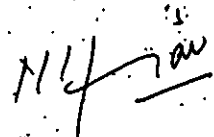
Copy to for information and necessary action:-

1. PA to Director, E & SE, KPK, Peshawar.

Yours Sincerely,

  
Mst. Nageena Bibi, SDEO(F),  
Tehsil Khanpur, District  
Haripur.

Contact No. 0332-8902256



Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa

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Amesure (D)

**OFFICE THE DISTRICT EDUCATION OFFICER (FEMALE)**  
**HARIPUR.**

**RELIEVING CHIT.**

In compliance with the order the Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar vide No.SO(MC) E&SED /4-16/2023/Posting /Transfer SDEO /H.Pur dated 02.08.2023.

Mst.Nagina Eibi SDEO (F) Khanpur District Haripur is hereby relieved from her duties today on 02.08.2023 (F.N) and directed to report to the Office of the undersigned.

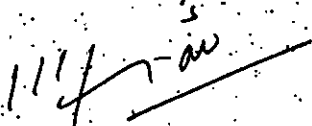
  
District Education Officer  
(Female) Haripur.

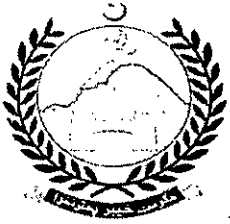
Endst.No. 6461-64 Dated Haripur the 02/08 /2023

Copy of the above is forwarded to:-

1. The PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar.
2. The Director E&SED Khyber Pakhtunkhwa Peshawar.
3. The District Accounts Officer Haripur.
4. The Deputy Commissioner Haripur.
5. Office order file.

  
District Education Officer  
(Female) Haripur.

  
Section Officer (Management Cadre)  
Elementary & Secondary Ed. Deptt.  
Govt. of Khyber Pakht.



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

(OFFICE PHONE No. 0995-920155)

No. 6401

Dated 27/07/2023

SECRETARY DIARY

No. 4562

Date 31/7/23

To,

**The Honourable Secretary,**  
Elementary & Secondary Education Department,  
Govt. of Khyber Pakhtunkhwa, Peshawar.

**Subject:- Complaint against Ms. Nagina Bibi, SDEO (Female) Tehsil Khanpur District Haripur.**

**Memo,**

Kindly refer to the following explanations served upon Ms. Nagina Bibi SDEO (Female) Tehsil Khanpur District Haripur.

1. Explanation issued vide this office letter No. 2115 dated 24-03-2022 on absence from duty on 22-03-2022 (Annexure-I).
2. Explanation issued to SDEO (F) Khanpur vide this office letter No. 2841 dated 30-04-2022 (Annexure-II).
3. Reminder to SDEO (Female) Khanpur on non-submission of reply of letter No. 2841 vide this office letter No. 2984 dated 09-05-2022 (Annexure-III).
4. Letter to Ms. Nagina SDEO (F) Khanpur regarding nonprofessional way of addressing in official correspondence vide this office letter No. 5863 dated 25-07-2022 (Annexure-IV).
5. Absent Notice to Ms. Nagina Bibi SDEO (F) Tehsil Khanpur vide this office letter No. 6378 dated 22-08-2022 (Annexure-V) on her absence from official meeting on 20-08-2022 (Annexure-VI).
7. Letter to the Director E&SE KPK regarding change of DDO Ship of SDEO (F) Khanpur vide this office letter No. 6931 dated 05-09-2022 (Annexure-VII).
8. Absent Notice to SDEO (F) Khanpur vide this office letter No. 6989 dated 06-09-2022 (Annexure-VIII).
9. Letter to the Honourable Secretary E&SE KPK on the legal notice of Ms. Nagina Bibi SDEO(Female) Khanpur vide this office No. 8007 dated 17-09-2022 (Annexure-IX).
10. Letter by Govt. of Elementary & Secondary Education Department for personal hearing on 05- 10-2022 (Annexure-X) on the complaint of undersigned as Annexure-IX.
11. Statement of Ms. Nagina Bibi SDEO (F) Khanpur in your good office that she will ensure professionalism & committed to her job and furthermore she will also withdraw legal notice / court case for cancellation of her transfer (which was already implemented). But she disregarded her commitment and neither did she change her attitude, nor she withdrawn her case from court which shows her mollified intentions (Annexure-XI).
12. Absent notice to Nagina Bibi SDEO (Female) Khanpur vide this office letter No. 5837 dated ~~03-07-2023~~ on her absence from Pre-DSC Meeting (Annexure-XII)

*Soeml)*

*1- Report to Director  
2- Put up charge sheet  
AS (E, A)  
7-23 AS (E, A)  
This issue shall  
permt.  
Please, plz direct  
show-come with  
7 Statement of  
allegations  
3/10/23*

Section Officer (Management Cadre)  
Elementary & Secondary Education Department  
Govt. of Khyber Pakhtunkhwa

*3/10/23*

15. Explanation issued Nagina Bibi SDEO (Female) Khanpur vide this office letter No. 6113 dated 15-07-2023 (Annexure-XV) on her absence from duty since 13-07-2023.
16. Instead of explaining her position and performing her duties regularly, now she submitted application for Earned Leave w.e.f 24-07-2023 to 19-08-2023 (Annexure-XVI).

The following more inefficiencies on her part are being submitted that:

- a) The undersigned called her on 24-07-2023 on Landline Number of Subdivision Office Khanpur but she disconnected her landline number intentionally from last few days because the undersigned usually verify her availability in office on her office landline number but always found her absent from office and during working hours she used to switch off her mobile number. As the schools are closed due to summer vacations and the undersigned directed her to attend the office of undersigned to accomplished different tasks, but she straight forward refused to attend the office of undersigned.
- b) A Pre-DSC meeting of all SDEOs was scheduled on 25-07-2023 regarding implementation of Honourable PHC Abbottabad Bench Judgments under the chairpersonship of the Deputy DEO (Female) Haripur. She did not sign the meeting minutes without any justification and behaved very rudely with the wordings that she is not answerable to the DEO.
- c) District steering committee meeting of EMA under the Chairmanship of Deputy Commissioner Haripur was scheduled on 27-07-2023 and the undersigned directed all the SDEOs to attend the meeting as usual but despite of special directions, neither she attended the meeting nor considered appropriate to inform the undersigned regarding her absence.

It is also pertinent to be mentioned that despite of so many letters, explanations, warnings as mentioned above and verbal directions to Ms. Nagina Bibi SDEO (Female) Tehsil Khanpur, she did not change her behavior and showing reluctance towards her assigned duties and not complying the official orders of the undersigned due to which subdivision is affecting badly. Her this attitude falls into the category of misconduct and inefficiency.

The undersigned already wrote a letter last year vide this office letter No. 8007 dated 17-09-2022 (Annexure-IX) but unfortunately no strict action taken against her due to which she become more reluctant than before and always denied from obeying the undersigned.

Keeping in view of above, it is requested that Ms. Nagina Bibi, SDEO (Female) Teshil Khanpur District Haripur may please be transferred to any other District and also requested that a formal inquiry may please be initiated against her in the larger public interest & smooth running of the District Office.

**Enclosure:- Annexure-I to XVI**

**District Education Officer (Female)**  
Haripur

Dated:- 27 / 07 / 2023

Endst: No. 6402104

**Copy forwarded for information to:-**

1. PS to the Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
3. The Deputy Commissioner Haripur.

Section Officer (Management Cadre)  
Elementary & Secondary Education Deptt.  
Govt. of Khyber Pakhtunkhwa

**OFFICE OF THE DISTRICT EDUCATION OFFICER (F)**

**HARIPUR**

Ph. No. 0995-920154, 920155



No. 21151

Dated: 24/03/2022.

To

The SDEO (F)  
Khanpur.

Subject: EXPLANATION.

Memo:-

With reference to visit paid by the undersigned on dated 22-03-2022 to your respective sub-division office at 01:00 PM and you were found absent without any intimation, your clerk was present in office and you have left office as roteen departure. Being on responsible post you have showed irresponsibility and incompetency.

In this regard you are strictly directed to take keen interest and follow official timings in future and explain your position within 02 days positively that why not disciplinary proceedings should be initiated against you, in case of non-compliance you will be treated under E&D Rule 2011.

*dc*  
  
District Education Officer (Female)  
Haripur

With Even No & Date:

Copy of the above is forwarded for information to:

- 1- Director, E&SE Department, KPK, Peshawar.
- 2- PA to Secretary, E&SE Department, KPK, Peshawar.
- 3- Office Record File.

*dc*  
  
District Education Officer (Female)  
Haripur

Section Officer (Management Cadre)  
Elementary Education Department  
Govt. of Punjab, Peshawar

14 And 02



**OFFICE OF THE DISTRICT EDUCATION OFFICER (F)  
HARIPUR.**

Ph. No. 0995-920154-55



No. 28411

Dated: 30/04/2022.

To

Sub Divisional Education Officer  
(Female) Khanpur.

Subject: - Explanation.

Memo:-

Reference subject cited above and to state that undersigned had received an application by headmistress GGPS Chhoi on 30-04-2022 in connection with interference of outsiders in said school on 27-04-2022 along with FIR copy which was registered in police station Khanpur upon your directions without bringing this matter in to the notice of undersigned which is against the official correspondence and violation of office protocol.

You are hereby directed to explain your position that in which capacity you exercise this power directly bypassing the undersigned, your written reply should be reached to this office within two days failing which disciplinary action will be imitated against you under E&D Rules 2011.

  
District Education Officer (Female)  
Haripur

Dated; 30/04/2022

Endst No. 2842-441

Copy of the above is forwarded to:

- 1- Director, Elementary & Secondary Education Department, Peshawar.
- 2- Deputy Commissioner, Haripur.
- 3- Office Record File.

  
District Education Officer (Female)  
Haripur

Secretary & Secretary





15 Anx 203

**OFFICE OF THE DISTRICT EDUCATION OFFICER (F)  
HARIPUR.**

Ph. No. 0995-920154-55



No. 29841

Dated: 09/05/2022.

**Reminder-I**

To

Sub Divisional Education Officer  
(Female) Khanpur.

Subject: - **EXPLANATION.**

Memo:-

Reference subject cited above and to state that undersigned has called an explanation vide no. 2841 on dated 30-04-2022 but you didn't replied up till now, also undersigned shows great displeasure upon your nonprofessional behaviour towards your job as well as by passing official matters.

In this regard your explanation (reminder-I) is hereby called with strict directions to explain your position within two days that why you were failed to submit your written reply timely, failing which disciplinary action will be initiated against you under E&D Rule 2011,

  
District Education Officer (Female)  
Haripur

Endst No. 2985-87A

Dated: 09/05 2022

Copy of the above is forwarded to:

- 1- Director, Elementary & Secondary Education Department, Peshawar.
- 2- Deputy Commissioner, Haripur.
- 3- Office Record File.

  
District Education Officer (Female)  
Haripur

Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa



**OFFICE OF THE DISTRICT EDUCATION OFFICER (F)**

**HARIPUR**

Ph. No. 0995-920154, 920155



No: 58631

Dated: 25/07/2022.

To

Nageena Bibi  
SDEO (F) Khanpur.


**Subject: NON PROFESSIONAL WAY OF ADDRESSING IN OFFICIAL CORRESPONDENCE.**

**Memo:-**

With reference to application received from head teacher GGPS Kot Jandan, Haripur forwarded by you vide no. 3003 dated: 23-07-2022, undersigned noticed that you are forwarding every document / application to this office without any covering letter by your office, your remarks on application shows that you are forwarding / directing to your subordinate instead of your officer, this shows non-serious, non-professional attitude.

Furthermore, this office is going to return your application with remarks to submit your official document with professional language by keeping in mind the hierarchy of officers, through proper channel instead of short cuts. Hoping a positive change in your attitude in future otherwise responsibility of the consequences will affixed upon you.

  
District Education Officer (Female)  
Haripur

  
Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa

17 Aug 2, 05



**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
HARIPUR**

No. 6378

Dated Haripur the 22-08 /2022

Phone No. 0995-920155

To

Ms. Nageena Bibi  
Sub Divisional Education Officer  
(Female).Khanpur.

Subject:- **ABSENT NOTICE.**  
Memo

With Reference to the subject cited above you were directed by the undersigned to attend office on 20-08-2022 but you were found absent on 20/08/2022 without any intimation to the undersigned which shows negligence and irresponsibility on your part.

Also you were directed by undersigned to monitor & report activities of schools of your respective subdivision regarding Enrollment Drive but unfortunately you didn't take it serious neither you reported any main activity by yourself to the office of undersigned which shows your highly regrettable & non professional attitude towards Enrollment task.

In this regard you are hereby directed to explain your position for your absenteesim & non-compliance of office order within two days positively, otherwise disciplinary action will be initiated against you under E&D Rules 2011.

Furthermore you are strictly directed to attend Deo(F) office twice in a week i.e (Friday & Saturday) in every week & follow office timings i.e 09.00Am to 02.00pm for Friday & 09.00Am to 04.00Pm for remaining working days .

*[Signature]*  
District Education Officer (Female)  
Haripur

Endst No 6379-82

Dated 22-08 /2022

Copy for information to the

1. The Director, E & SE KPK Peshawar.
2. The Deputy Commissioner Haripur.
3. The District Monitoring Officer (Education) Haripur.
4. Office record File.

*[Signature]*  
Section Officer (Management Cadre)  
Elementary & Secondary Edu Deptt,  
Govt of Khyber Pakhtunkhwa

*[Signature]*  
District Education Officer (Female)  
Haripur



18 Ans - (0)

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

(Office Phone No. 0995-920155 Fax No. 0995-920155)

No. 6454 /

Dated 23/08 /2022

To,

The Director,  
Elementary & Secondary Education Department,  
Govt. of Khyber Pakhtunkhwa, Peshawar.

**Subject: Non Compliance, Disobeying & Misuse of Powers by Ms. Nagina Bibi, SDEO (Female) Tehsil Khanpur District Haripur.**

Memo,

It is submitted that the undersigned assigned the different tasks to all the SDEOs at Primary level to achieve the enrollment targets and to complete the other official work properly and well in time, but unfortunately SDEO (Female) Tehsil Khanpur Ms. Nagina Bibi is continuously disobeying the official orders and undersigned is ignoring her non professional behavior since many time but today on asking about her reluctance in Pre-DSC, she unnecessarily argued and start shouting in office that she is not bound to obey.

Hence the undersigned wants to bring the following facts in your kind notice that:

1. She never observed the official timings nor does she often obey the orders of undersigned regarding her attendance in her duty place as well as in the office of undersigned whenever she called for important issues/meetings. The undersigned paid a surprise visit to SDEO (Female) Khanpur office on 22-03-2022 at 01:30 am and found the office closed and Ms. Nagina Bibi, SDEO (Female) Tehsil Khanpur was absent from her duty/office. On her absence, the undersigned issued an explanation letter to SDEO (F) Khanpur vide this office letter No. 2115 dated 24-03-2022 and now she was asked to attend the office of the undersigned on 20-08-2022 but she did not obey the orders and remained herself willful absent. In this connection an absent notice was also issued to her vide this office letter No. 6378 dated 22-08-2022 (Annexure-I).
2. Her behavior to the undersigned always remains arguing and often she works/decides the important matters directly without bringing into the notice of undersigned by bypassing. In this connection she also served an explanation notice vide this office letter No. 2841 dated 30-04-2022 (Annexure-II), Reminder-I vide No. 2984 dated 09-05-2022 (Annexure-III) & Reminder-II vide No. 3055 dated 12-05-2022 (Annexure-IV). She was also directed time to time regarding official protocol.
3. Due to her negligence, 03 newly constructed and taken over schools from C&W Department are lying closed as she failed to propose PSTs for functionalizing the schools for students. In this connection ADEO (P&D) also submitted a report regarding Disobeying behavior in respect of Ms. Nagina, SDEO (Female) Tehsil Khanpur vide letter No. 312 dated 23-08-2022 (Annexure-V).
4. Enrollment Data of Sub Division Tehsil Khanpur is still pending irrespective of clear cut the directions given to the SDEO (Female) Tehsil Khanpur in connection with the ongoing enrollment campaign 2022-23.
5. She was assigned the duties as member in Pre-DSC meeting for rechecking of the documents of meritorious candidates of PSTs but she refused to check the documents and start arguing/shouting in front of office staff with the statement that she is working on the post of SDEO (Female) Tehsil Khanpur on the orders of Honorable Court not by the Department and will perform the duties as per her own will and not bound to accept/obey the orders of undersigned.
6. It has also observed by the Internal Audit Team of O/O DEO (Female) Haripur on the scheduled audit of Sub Division Khanpur that misuse of powers has been exercised by the SDEO on the financial matters as well as discrepancies and flaws found (Audit Report as Annexure-VI).

Keeping in view of above and her non professional behaviour towards her official responsibilities which falls in the category of misconduct, it is requested that Ms. Nagina Bibi, SDEO (Female) Teshil Khanpur District Haripur may please be transferred to any other District in the larger interest of office of the undersigned and to maintain the protocol.

Enclosure:- Annexure-I to VI.

Endst: No. 6455 /

Copy for information to the:-

1. PS to the Secretary, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Office Record File.

o/c  
District Education Officer (Female)

Haripur  
Section Officer (Management)  
Elementary & Secondary Education Department  
Govt. of Khyber Pakhtunkhwa  
Dated 23/08 /2022

o/c  
District Education Officer (Female)  
Haripur



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**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR  
(Office Phone No. 0995-920154 Fax No. 0995-920155)**

No. 6931 /Misc file. Dated Haripur the 05/09/2022

To,

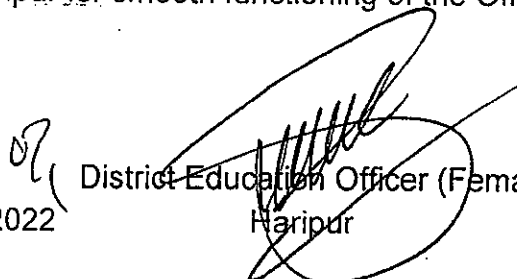
The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject: **CHANGE OF DDO SHIP - SDEO (F) KHANPUR.**

It is submitted for your kind information that Mst Nageena Bibi, SDEO (F) Khanpur misused/exceed the delegation of power, during the Internal Audit of Accounts for the period was carried out by this Office. She was also disobeyed/refused the official order given by the undersigned, whenever checked she found absent from her Office. Audit report is also attached for ready reference.

It is therefore you are requested to change her DDO Ship and appointed Mst Shagufta Jabeen Deputy District Education Officer (Female) Haripur as DDO Ship of SDEO (F) Khanpur for smooth functioning of the Office.


Endst No. 1932-34 Dated: 05/09/2022

  
District Education Officer (Female)  
Haripur

Copy to:-

1. The PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Assistant Commissioner Khanpur.
3. Office Record.

  
District Education Officer (Female)  
Haripur

  
Section Officer (Management Cadre)  
Elementary & Secondary Education  
Govt. of Khyber Pakhtunkhwa

20  
Annex = (8)

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

(Office Phone No. 0995-920154 Fax No. 0995-920155)

To,

No. 6789 / Absent Notice file. Dated Haripur the 06/09/2022  
Mst. Nageena Bibi  
SDIO (F) Khanpur

Subject: **ABSENT NOTICE.**  
Memo,

With reference to the subject cited above you were directed by the undersigned to attend office on 03.09.2022 (Saturday) but you were found absent without any intimation to the undersigned which show negligence and irresponsibility on your part.

In this regard you are hereby directed to explain your position for your absenteeism & non-compliance of office order within two days positively, otherwise disciplinary action will be initiated against you under E&D rules 20211.

Furthermore, you are strictly directed to attend DEO (F) Office twice in a week i.e. (Friday & Saturday) and follow office timing i.e. 09.00AM to 03.00PM for Friday and 09.00AM to 04.00PM for remaining working days.

District Education officer (F)  
HARIPUR.

Dated Haripur the 06/09/2022

Endst. No. 1990-94 /

Copy forwarded for information to :-

1. The PA to Secretary E&SD KPK Peshawar
2. The Director E&SE KPK Peshawar.
3. The Deputy Commissioner Haripur.
4. The District Monitoring Officer Haripur.
5. Office file.

District Education officer (F)  
HARIPUR.

Section Officer (Management Cadre)  
Elementary Education Deptt  
Govt of Khyber Pakhtunkhwa



21 KPM (10)

TO BE SUBSTITUTED WITH THE SAME NUMBER AND DATE  
**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

No.09/04/DS(Admin)/E&SED/2022  
Dated Peshawar the October 03<sup>rd</sup>, 2022

To

1. Mst. Nageena Bibi.  
SDEO Female Khan Pur Haripur.

**SUBJECT: PERSONAL HEARING**

I am directed to refer to the subject noted above and to direct you to attend the office of Deputy Secretary (Admin) Elementary and Secondary Education Department on 05.10.2022 (Wednesday) at 2.00 PM for personal hearing along regarding legal notice with all relevant record.

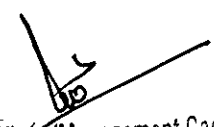
2. Mst. Sadia Aziz is directed to attend the hearing to appraise the undersigned regarding the subject issue.
3. The Litigation officer DEO (f) Office concerned to appear with all relevant court record/order sheets of concerned SDEO Female Khan Pur Haripur Case.

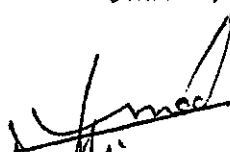
**Deputy Secretary (Admin)**

**Endst: of even No. & Date:**

Copy forwarded for information to: -

1. Director, E&SE Khyber Pakhtunkhwa.
2. District Education Officer (Female) Haripur with the request to inform the above incumbents please.
3. PS to Secretary, E&SE Department.
4. PA to Additional Secretary (General) E&SE Department.
5. Section Officer (Management Cadre), E&SE Department.
6. Section Officer (Complaint/inquiry), E&SE Department.

  
Section Officer (Management Cadre)  
Elementary & Secondary Education Department  
Civil Secretariat Peshawar

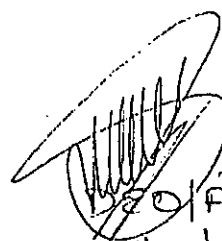
  
PA to Deputy Secretary (Admin)

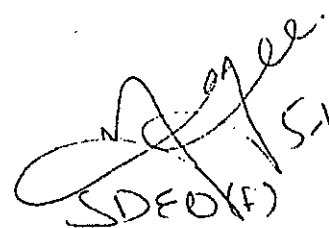
Statement

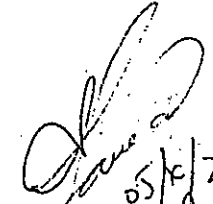
Today (05/10/2022) DEO(F) Khanpur and SDEO(F) Khanpur District Hanjira <sup>Mst</sup> Sadiya Akbar DEO(F), Mst. Nazima Bibi SDEO(F) Khanpur attended the C/P of Addl Secretary. Both were present in Detail by the Honorable Chair.

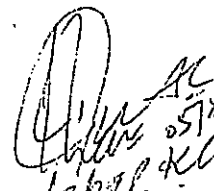
Both agreed on the peaceful resolution of disputes between them. The concerned SDEO(F) Khanpur Mst. Nazima Bibi Khanpur pledged to withdraw the ~~complaint~~ ~~complaint~~ ~~complaint~~ ~~complaint~~ in ~~district~~ ~~district~~ ~~district~~ ~~district~~ as well as legal notice to Director EKSE, DEO(F) Khanpur and others unconditionally. The concerned SDEO(F) Khanpur requested to withdraw the pending inquiry against filed by the DEO(F) Khanpur District.

The chair insured full cooperation in this regard. Both the officers promised to ensure peaceful education environment in District Khanpur (F) schools.

  
DEO(F) Khanpur  
05/10/22

  
SDEO(F) Khanpur  
05-10-2022

  
DS/Legal  
05/10/22

  
05/10/2022  
Dr. Iqbal Khan  
Addl. Director



ROEEDA KHAN  
Advocate High Court Peshawar

Off: Justice Seth Waqar Building New Bar  
Judicial complex Peshawar

Dated 07/09/2022

Registered A/D

To,  
Mst. Sadia Aziz District Education Officer (Female)  
District Haripur

Subject: LEGAL NOTICE

Respected Madam:

I, have been briefed, instructed and authorized by Mst Nagina Bibi (SDEO) (Female) Tehsil Khanpur District Haripur (hereinafter referred to as my client) to serve upon you the following legal notice:

- 1) That my client name above working as SDEO Female Tehsil Khanpur District Haripur since 27<sup>th</sup> October, 2021 whereby after two months pre-mature and illegal transferred order has been passed against my client and transferred my client from Haripur to Tehsil Pabbi District Nowshera and handed over the charge to the SDEO Female Pabbi without Intimation to my client which shows a clear cut malafide on part of you.
- 2) That the Government granted/issued a Government vehicle No. A1120 for Government purpose to my client which has been taken you illegally from my client without any legal justification which shows a clear cut malafidely on part of you.
- 3) That you have called an illegal explanation from my client on the basis of FIR lodge by head teacher GGPS Choi, Tehsil Khanpur by mentally pressurizing my client, although it is a well settle principal of law that no one can be punish for the wrong of others.
- 4) That you have also called an explanation from my client on the basis of absentia however there is no unauthorized absentia on part of my client.
- 5) That you have issue in official letter No. 6889 dated 03-09-2022 regarding account matters, that no any accounts

24  
A (11-B)

transaction made without you either you have no competency.

- 6) That you have issued absent notice of vide letter No. 6989 dated 06-09-2022 as she is on visit and in her office for official work, which is illegal.
- 7) That you have endorse letter of vide letter No. 1608-10 dated 07/09/2022 and 7119 dated 08/09/2022 regarding shifting of DDO ship which is also illegal practice on part of you.
- 8) That in the above stated facts you have called illegal explanations and also taken illegal actions by misuse illegal powers and malafide practice by showing personal gradges with my client and due to the said illegal action of you my client faces mental torture and pressure and for such illegal practice of you, my client have the power to take legal action against you under harassment act.

Now therefore through the instant legal notice I want to inform you to stop such illegal action against my client within seven days otherwise, will take legal action against you in competent court of law.

**Note:** A copy of this legal notice is retained in my office for further necessary legal action.

Dated 09/09/2022

Advocate



Roeda Khan  
Advocate High Court  
Peshawar

**Note:** A copy of this legal notice is retained in my office for further legal action.

Advocate

Copy forwarded to

1. Director Elementary and Secondary Education KPK Peshawar.
2. Secretary Elementary and Secondary Education KPK Peshawar.

Section Officer (Management Cadre)  
Primary & Secondary Edu: Deptt.  
Govt. of Khyber Pakhtunkhwa



25  
Ans - (12)

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

(Office Phone No. 0995-920155 Fax No. 0995-311587)

No. 5837 / Absent Notice file. Dated Haripur the 03/07 2023

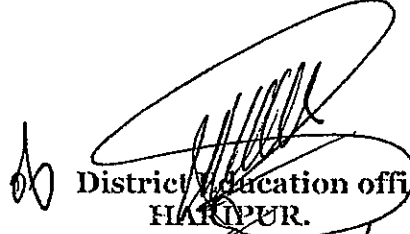
To,

Mst. Nagcena Bibi  
SDEO (F) Khanpur

Subject: **ABSENT NOTICE.**  
Memo,

With reference to the subject cited above you were directed by the undersigned to attend DE O (F) office daily during the summer vacations of School. But you failed to follow the instructions today was pre-DSC meeting you are member of the committee but you was absent from office despite of my message to refuse you from leave. Which shows that you are non-serious and non-professional toward your job.

Keeping in view of the above. You are hereby directed to explain your position as to why disciplinary action should not recommended against you under Khyber Pakhunkhwa Govt. Efficiency and disciplinary rules 2011. Your written reply must reach to the undersigned within 02 days.

  
District Education officer (F)  
HARIPUR.

Endst.No. 5838-41 /

Dated Haripur the 03/07 2023

Copy forwarded for information to :-

1. The PA to Secretary E&SED KPK Peshawar
2. The Director E&SE KPK Peshawar.
3. The Deputy Commissioner Haripur.
4. The District Monitoring Officer Haripur.
5. Office file.

  
District Education officer (F)  
HARIPUR.



26 / 10 / 23  
Area = 13

**OFFICE OF THE**  
**DISTRICT EDUCATION OFFICER (FEMALE)**  
**HARIPUR**  
**(Office Phone No. 0995-920155 & No. 0995-311587)**

No. 5884 /Warning file.

Dated Haripur the 06-07/2023

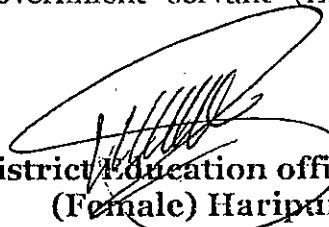
To,

Mst.Nagina Bibi  
SDEO (F) Khanpur.

Subject: **WARNING.**  
Memo,

The reply submitted by yourself is not justified you should be well aware about your job description.

Therefore you are hereby warned to be careful in future and ignore such kind of practice, otherwise disciplinary action shall be recommended against you under the Khyber Pakhtunkhwa Government servant (Efficiency and Discipline) rules 2011.

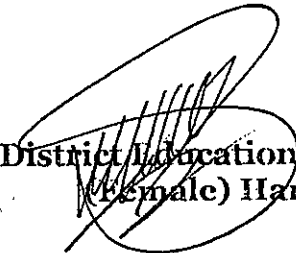
  
District Education officer  
(Female) Haripur


Endst. No. 5885-88 /

Dated 06-07 /2023

**Copy of the above to**

1. The PS to Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
2. The Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
3. The Deputy Commissioner Haripur.
4. Office order file.

  
District Education officer  
(Female) Haripur

  
Section Officer (Management Cadre)  
Elementary & Secondary Education  
Govt. of Khyber Pakhtunkhwa

27  
Ans - (15)

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
HARIPUR**  
(OFFICE PHONE No. 0995-920155)

No. 6113 /

DATED 15/07/2023

To,

Ms. Nagina Bibi,  
Sub Divisional Education Officer (Female),  
Tehsil Khanpur.

Subject:- Explanation.

Memo,

With reference to the explanation served upon you vide this office letter No. 5917 dated 18-07-2023 on your absence (Copy enclosed).

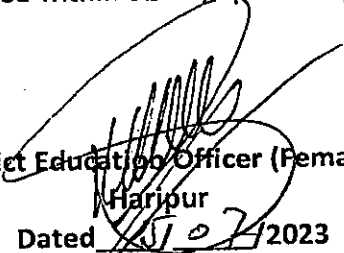
It is very regretting to state that despite of submitting your reply on the explanation on your absence, you again remained yourself absence from duty since 13-07-2023 which shows the highly non serious and non professional attitude towards your job descriptions.

Your this behavior is not only affecting the official works of Sub Division but impacting bad impressions on your sub ordinates regarding their duties and following the official orders of High Ups.

Therefore, keeping in view of the above, you are hereby called upon to explain as to why disciplinary proceeding should not be initiated / recommended against you under E&D Rules 2011.

The reply of this must be reached to the undersigned within 02 days positively.

Enclosure: As above.

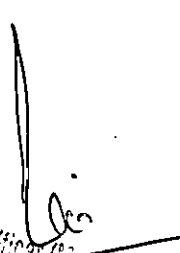
  
District Education Officer (Female)  
Haripur  
Dated 15/07/2023

Endst: No. 614-17 /

Copy forwarded for information to the:-

1. PS to the Secretary, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. The Director, Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
3. The Deputy Commissioner, Haripur.
4. Office Record File.

  
District Education Officer (Female)  
Haripur

  
Section Officer  
Elementary & Secondary Education Department  
Haripur

28

Ans c (16)

To

✓ The District Education Officer (Female)  
Haripur

Subject: APPLICATION FOR EARNED LEAVE WITH FULL PAY

Respected Madam,

It is very humbly submission to your kind honour that due to some very urgent domestic affairs, I could not attend my official duties, with effect from **24 July, 2023 to 19 August, 2023 (27 days)**.

It is humbly requested your kind command that may be forwarded my Earned Leave for the period from **24 July, 2023 to 19 August, 2023 (27 days)** on full pay, to the quarter concerned for further process into the course of matter please.

I shall be thankful and obliged please.

Your's Sincerely

(NAGEENA BIBI)

SDEO (F) Khanpur

17-07-2023

Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa

Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa