

08.06.2017

Since the tour programme for the month of June, 2017 to camp court Swat has been cancelled by the Worthy Chairman, therefore, to come up for the same on 02.10.2017 at camp court, Swat. Notices be issued to the parties for the date fixed accordingly.



Registrar

02.10.2017

Counsel for the appellant and Mr. Anwarul Haq, Deputy District Attorney alongwith Asif Khan, Assistant Director and Muhammad Saeed, SS for the respondents present. The learned counsel for the appellant wants to withdraw the appeal on the ground that he wants to file departmental appeal against the order of removal from service of the appellant dated 10.10.2009 and there-after he would avail his legal remedy. The learned counsel wants to add the remarks that the appellant came to know about the order dated 10.10.2009 during pendency of the present appeal.

In view of the above this appeal is dismissed as withdrawn. The appellant is at liberty to avail his legal remedy under the law. File be consigned to the record room.


Member


Chairman
Camp court, Swat

ANNOUNCED


02.10.2017

02.05.2016

Counsel for the appellant and Mr. Muhammad Zubair, SGP for the respondents present. Rejoinder by appellant submitted. Counsel for the appellant requested for adjournment. To come up for final hearing before D.B on 04.10.2016 at Camp Court, Swat.




Member


Chairman
Camp Court Swat

04.10.2016

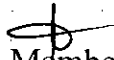
None present for the appellant. Mr. Muhammad Zubair, Senior Government Pleader for the respondents present. Notices be issued to appellant and her counsel. To come up for final hearing before the D.B on 06.2.2017 at camp court, Swat.



Member


Chairman
Camp court, Swat

06.02.2017

Junior to Mr. Noor Muhammad Advocate, counsel for the appellant and M/S Khushi Muhammad SO and Muhammad Shamim, P.A alongwith Mr. Muhammad Zubair, Senior Government Pleader for respondents present. Seeks adjournment as senior counsel for the appellant has not turned up from Peshawar. Adjourned for final hearing before the D.B to 05.06.2017 at camp court, Swat.


Member


Chairman
Camp court, Swat

7 2.6.2015 None present for appellant. Mr. Mr.Anwar-ul-Haq, GP for respondents present. Since the appeal has been posted at camp court Swat due to transfer from Peshawar as such notice to appellant be issued for rejoinder and final hearing before D.B for 7.9.2015 at camp court Swat.


Member


Chairman
Camp Court Swat

7.9.2015 None present for appellant. Mr.Irshad Muhammad, S.O for respondent No.4 alongwith Mr.Muhammad Zubair, Sr.GP for all respondents present. Notice to appellant and her counsel be issued for rejoinder and final hearing before D.B for 9.12.2015 at Camp Court Swat.

*Noted for
9/12/2015
GP*

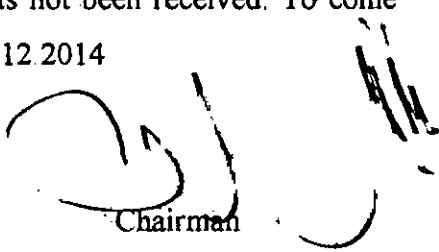

Chairman
Camp Court Swat

09.12.2015 None present for appellant. Mr. Amir Qadir, GP for respondents present. Due to non-availability of D.B arguments could not be heard. To come up for rejoinder and final hearing before D.B on 2.5.2016 at Camp Court Swat.


Chairman
Camp Court Swat

6
12.08.2014

Counsel for the appellant and Mr Muhammad Bashir, AD on behalf of respondents No.1, 3 and 5 with AAG for the respondents present. Written reply has not been received. To come up for written reply/ comments on 11.12.2014


Chairman

11.12.2014

No one is present on behalf of the appellant. Mr. Muhammad Bashir, AD on behalf of respondents No, 1, 3 and 5 with Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for written reply/comments on 30.03.2015.


Reader.

6 30.03.2015

Agent of counsel for the appellant and Mr. Ibrar Ali, AD for respondents present. Written statement submitted. The appeal is assigned to D.B for rejoinder and final hearing. The appeal pertains to territorial limits of Malakand Division and as such to be heard at Camp Court Swat on 2.6.2015.

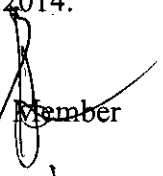

Chairman

Appeal No. 1594/2013
Mst. Sheila Jozar

12.02.2014

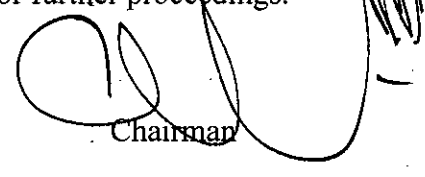
Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. The appellant has impugned order dated 21.11.2013, whereby the departmental appeal of the appellant for the submission of her charge report and grant/release of her monthly salaries w.e.f. 16.07.2008 till dated has been rejected. He further contended that the impugned order has been issued in violation of Rule-5 of the Civil Servant (Appeal) Rules-1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 06.05.2014.

Appellant Deposited
Security & Process Fee
Rs. 220/- Bank
Receipt is Attached with File.


Member

12.02.2014

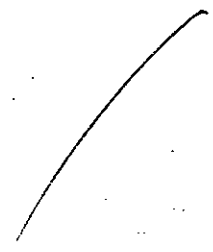
This case be put before the Final Bench D for further proceedings.


Chairman

6-5-14

The Hon'ble bench is on Pous
Therefore, case is adjourned to
12.8.14




Rada



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1594/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09/12/2013	<p>The appeal of Mst. Shehla Ibrar presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>12-2-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2	17-12-2013	

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1594/2013

SHEHLA IBRAR

VS

GOVT: OF KPK

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE NO.
1-	Memo of appeal	1- 5.
2-	Service book	A	6- 15.
3-	Notification	B	16- 17.
4-	Relieving chit	C	18.
5-	Letters	D&E	19- 21.
6-	Reliving chit	F	22.
7-	Charge report	G	23.
8-	Departmental appeal	H	24- 25.
9-	Judgment	I	26- 27.
10-	Rejection order	J	28.
11-	Vakalat nama	29.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

MOBILE NO.0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1594 /2013

Mst: Shehla Ibrar, Lab Assistant (BPS-07),
Government Girls Degree College Chitral, District Chitral

BWJ
1630
9-12-13

..... (Appellant)

VERSUS

- 1- The Secretary Higher Education Department, Khyber Pakhtunkhwa Peshawar.
- 2- The Secretary Establishment Department, Khyber Pakhtunkhwa Peshawar.
- 3- The Director Higher Education Department, Khyber Pakhtunkhwa Peshawar.
- 4- The Secretary Finance Department, Khyber Pakhtunkhwa Peshawar.
- 5- The Principal Government Girls Degree College Chitral, District Chitral.

..... (Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER
PUKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGIANST THE IMPUGNED ORDER DATED
21.11.2013 WHEREBY THE DEPARTMENTAL
APPEAL OF THE APPELLANT FOR THE SUBMISSION
OF HER CHARGE REPORT AND GRANT/RELEASE OF
HER MONTHLY SALARIES WITH EFFECT FROM 16-
7-2008 TILL DATE HAS BEEN REJECTED ON NO
GOOD GROUNDS

9/12/13

PRAYER:

That on acceptance of this appeal the impugned order dated 21.11.2013 may very kindly be set aside and the respondents may be directed to allow the appellant to submit her charge report at Government Girls Degree College Chitral. That the respondents may further please be directed to release the monthly salaries of appellant with effect from 16-7-2008 till date. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of appellant.

R.SHEWETH:

- 1- That the appellant was appointed as lab assistant (BPS-07) in the respondent Department vide order dated 1-7-1997. That since then the appellant performed her duties quite efficiently and up to the entire satisfaction of his superiors. Copy of the service book is attached as annexure **A.**

- 2- That the services of the appellant were transferred to Federal college Islamabad for three years on deputation basis. That in response appellant was relieved from Government Girls Degree College Chitral vide dated 11-10-2006. Copies of notification and relieving chit are attached as annexure **B & C.**

- 3- That after serving for more than one and half year at the Girls College G-10 Islamabad on deputation basis a dispute was arised between the appellant and the concerned College Principal, that in this connection the appellant informed the respondent No.2 about the misbehavior of the concerned College Principal. That it is pertinent to mention that the appellant also informed the Assistant Director Colleges Federal Directorate of colleges about the above mentioned matter. Copies of the letter are attached as annexure **D & E.**

4- That the appellant was relieved from the Federal College for Women G-10 /4 Islamabad and her services were sent back to the Home Department i.e. respondent No.2 vide dated 15-7-2008. That since then the appellant approached/visited the concerned college that is Government Girls Degree College Chitral for submission of her arrival report but concerned college Principal refuse to submit her arrival report on the pretext that appellant will firstly informed the respondent No.2 for advice in the matter. That at last the appellant wrote a letter to the respondent No.2 for re-joining of duty but no reply has been received so far in this connection. Copies of the relieving chit and letter are attached as annexure **F & G.**

5- That despite of repeated request the respondent did not allow the appellant to re-join duty as lab assistant (BPS-07) that feeling aggrieved the appellant filed Departmental appeal on 30.11.2012 but no heed was paid by the respondent Department to the said request of appellant. That then after the appellant feeling aggrieved filed service appeal before this august Tribunal in appeal No.610/2013 which was disposed off by this august Tribunal with the direction to the respondent Department to disposed off the Departmental appeal of appellant one way or the other within one month. Copies of the Departmental appeal and judgment are attached as annexure..... **H and I.**

6- That in response the respondent No.3 has turned down the Departmental appeal of appellant on no good grounds vide order dated 21.11.2013. Hence the present appeal on the following grounds amongst the others. Copy of the rejection order is attached as annexure **J.**

GROUND:

- A- That the impugned order dated 21.11.2013 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That not adjusting/allowing the appellant to re-join her duty as Lab: Assistant (BPS-07) at Government Girls Degree College Chitral District Chitral is against the law and prevailing rules.
- C- That appellant has not been treated in accordance with law and rules on the subjected noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- D- That despite repeated requests the respondent Department did not allowed the appellant to re-join her duty as lab Assistant (BPS-07) at Government Girls Degree College Chitral District chitral without showing any reason and justification.
- E- That the respondents acted in malafide manner by not allowing the appellant to re-join her duty as Lab Assistant (BPS-07) at GGDC Chitral.
- F- That the respondents discriminated the appellant on the subject noted above.
- G- That despite of relieving the appellant by the Federal Government College the respondent Department is not willing to adjust the appellant on the post of Lab Assistant (BPS-07).
- H- That respondents acted in arbitrary and malafide manner by not adjusting her at her original post of Lab Assistant (BPS-07).

I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT



SHEHLA IBRAR

THROUGH:



NOOR MUHAMMAD KHATTAK

ADVOCATE

Passed her F.A. Examination under
Roll No. 169875 Session 1998(A) obtaining
471 marks out of 1100 and result declared

Qualification Roll No 11-98 Dated

Principal
Govt. Girls High School
Bhaw. Distt. Chitral
Principal received back
Govt. Girls High School
Bhaw. Distt. Chitral

Left thumb - impression

Qualification	Date	Qualification	Date
English		First Arts	
Pashtu		B. L. or B.A.	
Urdu		Pledership examination	
Plan - drawing		Training School Final Examination	
Finger Print		Other qualification	
Drill/instructing			
Court duties			

ATTESTED
[Signature]

Note:- The entries in this page should be renewed or re-attested at least every five years and the Signature to This 9 and 10 should be dated.

1. Name *Shehla Abrar*
2. Race *Banraj (Muslim Pakistani)*
3. Residence *Village Ajam Teh: chitral Dist: chitral*

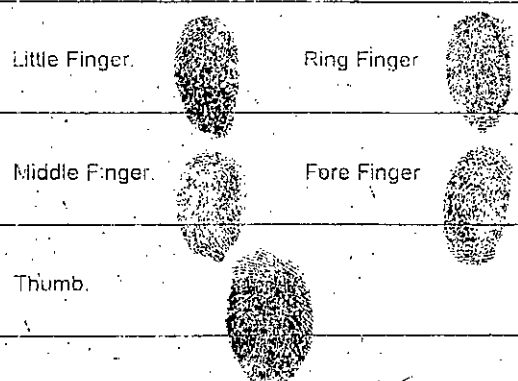
4. Father's name and residence *Shulam Abrar*

5. Date of birth by Christian era as nearly as can be ascertained *9-8-1979*

6. Exact height by measurement *5*

7. Personal marks for identification *A Mole on Nose*

8. Left hand thumb and Finger impression of (non-gazetted) officer.



9. Signature of Government Servant ✓ *Shehla Abrar*

10. Signature and designation of the Head of the Office, or other Attesting Officer.
[Signature]
Principal
Govt Girls Higher Sec
School Staff Chitral

ATTESTED

[Signature]

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) Substantive appointment, or (ii) Whether service counts for pension under Art.371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
1680-81-2495 1305 No 1							
Lab. Asst. G. H. B. Ch. Hal			Rs. 1480/-			1/7/97	Shehl Abra
			Rs. 1480/-			1/12/97	Suwal
= do =		(Revised entry)					
= do =			Rs. 1480/-			1/12/97	Suwal
= do =			Rs. 1642/- ✓			10/11/98	Suwal
= do =			Rs. 1723/- ✓			1/12/98	Suwal
= do =			Rs. 1804/-			1/12/99	Suwal
= do =			Rs. 1835/-			1/12/2000	Suwal
= do =			Rs. 1885/-			28/2/2001	Suwal
= do =			Rs. 1966/-			1/12/2001	Suwal

Pay is fixed in the revised basic
 Pay Scales 2001 vide Govt. of NCT of
 Finance Department Notification No. FD(PRC)
 1-1/2001 dated 27-10-2001 in the revised
 basic pay scales 7 of Rs. 2220-120-5820

Pay fixed on - 1/12/2001 Rs. 2740/-

PRINCIPAL
 Govt. Girls Degree College
 Ghural

ATTESTED
 [Signature]

OFFICE OF THE DISTRICT ACCOUNTS OFFICER GENERAL.

With reference to Para 17 (a) of Finance Division (Regulation wing's) O.M. No.F.I (5) imp/2001 dated 4th September, 2001, I hereby opt pay and pension/commutation of :-

(Relevant box to be signed).

- i. Basic Pay Scale 1994 _____
- ii. Basic pay Scale 2001. _____ *Shehla*

NAME. _____
 (Block Letters) SHEHLA ABRAR
 Father's Name:- Ghulam ABRAR
 Designation. LAB - ASSAT BPS. 7
 N.I.C.NO. 103-79-267010

DATED. 01/11/2001 SIGNATURE. *Shehla*

ATTESTED
[Signature]

[Signature]
 PRINCIPAL
 City Degree Col
 District

10

9	10	11	12	13		14	15	
Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government	Period Government to which debitale		
Principal Govt Girls Higher Sec School Distt. Gwalior Wilson	30/11/97	Avail.	Principal Govt Girls Higher Sec School Distt. Gwalior		Appointed against vacant Lab. Assst. post at 6/1/98 Chitral vide D.O. (F) Secondary Chitral Distt. No 1433-1445 dt: 24-6-97 She took over charge dt: 1-7-97			
Principal Govt Girls Higher Sec School Distt. Gwalior	19/11/98	Two Rtd mch: 60 passing 2 F.A. Exam	Principal Govt Girls Higher Sec School Distt. Gwalior					
Principal Govt Girls Higher Sec School Distt. Gwalior	30/11/98	Avail.	Principal Govt Girls Higher Sec School Distt. Gwalior		Service verified well 1.7.97 to 31.12.98 Office record and A/Kall of the office.			
Principal Govt Girls Higher Sec School Distt. Gwalior	30/11/99	do	Principal Govt Girls Higher Sec School Distt. Gwalior					
Principal G.O.H.S.S. Gwalior	28-2-2001	Transferred / Adjusted at 4900 clerical.	Principal G.O.H.S.S. Gwalior					
Principal G.O.H.S.S. Gwalior	8/11/2001	Also avail du on 30/11/2001	Principal G.O.H.S.S. Gwalior		paid on 7/11/97 for due to a select @ Khandwa in chitral for F.A. U.F. 1/11/97 & LCA 2/2001			

ATTESTED

[Signature]

leg.

(11)

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government St
BPS-7-R-2220-120-582							
Lab. Ass. II			Rs. 2940/pm.			1/12/2001	Shinde
=do=			Rs. 3060/pm.			1/12/2002	Shinde
=do=			Rs. 3180/pm.			1/12/2003	Shinde
=do=			Rs. 3300/pm.			1/12/2004	Shinde
=do=			Rs. 3300/pm.			30/12/2005	Shinde
2555-140-6755	By refused in the revised BPS-7 e B.						
BPS-7: Lab. Assistant	2555-140-6755 w/1-1-2005						
College - Chhatrapati	By fixed on 1/12/2005 B: 3815/pm.						

PRINCIPAL
G. S. Degree College
Chhatrapati

ATTESTED

5

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment.	Signature of Government
BPS-7 2555-140-6155							
Ms. Asst. G.G.D. Chikal							
_____			3955/-			1-12-2005	Shiraj
_____			3955/-			11-10-2006	Shiraj

Transferred from G.G.D. Chikal to Federal Director of Education Islamabad on Deputable basis vide D.H.F. No. 5 P. D. No. 26746-49/KA-VI/1 Esst. Branch dt. 16/10/06. She has already retired from N.S. College on 11/10/06 AN.

Principal
Girls Degree College
Chikal

ATTESTED

29/7

Islamabad 17/9/2006

B-15

OFFICE MEMORANDUM

Subject: DEPUTATION OF MRS. SHEHLA AHRAH, LAB. ASSISTANT,
GOVERNMENT GIRLS DEGREE COLLEGE CHITRAL, NOC.

I am directed to refer to your letter No. 241 dated 29-03-2006 on the subject.

The Competent Authority has granted its approval to the appointment of Mrs. Shehla Ahrah, Lab. Assistant Government Girls Degree College Chitral as Lab. Assistant (BPS-07) in the Educational Institutions of Federal Directorate of Education (FDE), Islamabad on the following terms and conditions:

- i) She will join here on assignments at her own expense.
- ii) Federal Government shall not pay any T.D.Y. in connection with joining of this appointment.
- iii) No deputation allowance shall be paid to her.
- iv) GP Fund pensionary liabilities will be shared by the respective Governments.
- v) FDE shall pay salary to the Deputation as per L.P.C. of the incumbent.
- vi) The period of Deputation is 03 (Three) year only.
- vii) The incumbent shall stand relieved/reappointed after completion of deputation period on or on appointment of an incumbent which ever is earlier against the post reserved for the province/region.

If above mentioned terms and conditions are acceptable to Mrs. Shehla Ahrah, Lab. Assistant, Government Girls Degree College Chitral, she may be directed to report for duty to FDE within 15-days from the date of issue of this letter along with proper relieving report / L.P.C. / Service Book etc. for further posting. Failing which, this letter shall automatically stand cancelled.

This is issued with the approval of the Competent Authority.

(PROF. ABDUL HAFEEZ)
DIRECTOR (ADMIN-II)

To: Mr. Iqbal Muhammad,
Section Officer (Education-II)
Government of NWFP,
Higher Education, Archives & Libraries Department
Peshawar.

Copy to:

1. P.S to Minister of State for Education, Islamabad w/r to D.No.34, dated 25-05-06
2. Mr. Jamroz Khatt, AFA (S & C), Government of Pakistan, Ministry of Education, Islamabad.
3. P.S to D.O (Education).
- ✓ 4. Mrs. Shehla Ahrah, Lab. Assistant, Government Girls Degree College Chitral

(GUSZAR AHMAD)
ADMIN. OFFICER (ADMIN-II)

19-9-2006

ATTESTED

nr
q

GOVERNMENT OF NWFP
HIGHER EDUCATION, ARCHIVES & LIBRARIES
DEPARTMENT

No.SO(Education-II) X-4 /2006
Dated Peshawar the 28th August 2006


To
The Director,
Federal Directorate of Education,
Islamabad.

Subject:- DEPUTATION.

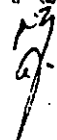
Dear Sir,

I am directed to enclose herewith proforma duly filled in alongwith relevant documents pertaining to deputation to Federal Directorate of Education Islamabad in respect of Mst. Shehla Ibrar, Lab Assistant Government Girls College Chitral for your views/comments please.

Yours faithfully,


(ISRAR MOHAMMAD)
SECTION OFFICER (EDUCATION-II)

Encls:-As above.

ATTESTED


C - (18)

CHARGE REPORT.

Certified that Mrs. Shehla Abrar this day 11th October-2006 (A.N) relived the charge of the post of Lab: Assistant at Girls Govt Govt:Girls Degree College Chitral vide Director of Higher Education NWFP, Peshawar No. 26746-49/CA-VII/Estt: Branch dated Peshawar the 10/10/2006. ✓

Station Chitral.

Dated 11.10.2006(A.N)

Signature of Relived
Government Servant. Shaehla Abrar
Designation Lab: Assistant

Signature of Received
Government Servant Vacant
Designation

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE CHITRAL.

Endst: No. 406-12 1A-7

Dated 11/10 /2006.

Copy forwarded to the:-

1. Director of Higher Education NWFP, Peshawar with reference To his No noted above
2. Federal directorate of Higher Education Islamabad
3. Section Officer (II) Govt: of NWFP Higher Education Department Peshawar
4. District Accounts Officer Chitral.
5. Official Concerned
6. Office Copy.

Evil Abu

PRINCIPAL
GOVT: GIRLS DEGREE COLLEGE
CHITRAL.

APPROVED

MS

March 15, 2008

The Director
Directorate of Colleges
Civil Secretariat
Near District Court
Peshawar

D - (19)
for 1 and half year due
to certain reasons.

Ref: Notice of Misbehavior of Principal Girls College G-10 Islamabad

Dear Sir,

Please refer my letter Dated 19/12/2007 regarding subject.

I have been transfer to above college for 3 year deputation as Lab Assistant. The Principal of the college is insulted me in front of whole college to duty in place of office attendant. I have complaint his behavior to Directorate of Colleges Islamabad, but now yet received any progress.

Now you are kindly requested to contact Directorate of Colleges Islamabad to investigate the matter and adv. Me accordingly. In case any issue please cancel my deputation and call me back to my parent department.

I will remain grateful to you for your kind help.

Regards

Shehla

Shehla Abrar
Lab Assistant (on Deputation to Federal Govt. Islamabad)
C/O Zuhuruddin, Operations Manager
Atlas Bank Limited, 24 Raza Noor Plaza Blue Area Islamabad
Ph 03335137507 and 03345017704

CC: 1. Principal
Govt Girls Degree College
Chitral

2. DG Colleges, Directorate of Colleges, Islamabad

ATTESTED

13
g

E - (20)

June 5, 2008

Mr. Jamil Ahmad Rana
Assistant Director C
Federal Directorate of Education
Islamabad.

Your Ref: No. F-1-1/2006 (CA-11) FDE dated June 2, 2008

My Ref: Complain against Principal FGCW G-10/4 Islamabad dated November 28, 2006
And Appearance against my complain at H-8 College Principal Last Year

Please refer to my absconding/absence as per your record. As per me, I was deputed as Lab Assistant at FGCW, G-10/4, Islamabad for 3 years deputation as per approval from Education Minister, Director General Federal Education, Director of Colleges Peshawar and Section Officer Education II Govt of NWFP.

With thanks to my transfer case from Chitral to Islamabad where my family is settled from the last 14 years I was happy to join at FGCW G-10/4 Islamabad and I was regularly working for two months. Suddenly Principal at that time stressed on me through her Order to work as Lab attendant. When I have told that I am lab assistant not lab attendant then she misbehaved in front of all staff, this was first time in my life that such type of women I have seen in my life with misbehave and was transferring my job from Lab assistant to lab attendant.

Therefore I have written complained against her/principal FGCW G-10/4 to Director Admin, FDE Islamabad, Director General FDE Islamabad with Copy to Minister of Education, Principal FGCW G-10/4 Islamabad, Section Officer Education II Govt of NWFP, Director of Colleges Peshawar and to the principal Govt Girls Colleges Chitral to take action against change of my duty and misbehavior.

Since my complain from November 2006 to date I have not been informed against any action. My husband was Operation Manager at Union Bank Limited, Bahria Town Branch Rawalpindi and all my applications held in your record shows the above address and my cell number 03335137507 and 03345017704 is the same since 2006. How can it possible that I am not traceable in my above address.

For your kind information your above letter attached herewith was sended to United Bank Limited Bahria Town Instead of Union Bank Limited.

All your previous correspondent have not been delivered to me at my given address. Now you are kindly requested for further correspondent please route your mails at below mentioned address

ZUHURUDDIN
OPERATION MANAGER
ATLAS BANK LIMITED
24 WEST RAZA NOOR PLAZA
BLUE AREA ISLAMABAD
CELL 03345017704
CELL 03335137507

ATTESTED



Now you are requested to check my complain and let me inform against the decision of the competent authority at my above address, otherwise I will get the help of court and human right to solve my problem.

Regards,

Shehla

Shehla Abrar
C/O Zuhuruddin
Atlas Bank Limited
24 West Raza Noor Plaza
Blue Area Islamabad
Cell 03345017704
Cell 03335137507

Copy: Minister of Education
Ministry of Education
Islamabad

Secretary of Education
Shaheed Millat Secretariat
China Chowk Islamabad

Principal
Federal Govt Girls College for Women
G-10/4 Islamabad

The Section Officer
Education II
Govt. of NWFP Higher Education
Archives and Libraries Department
Peshawar

Mr. Jehangir Khan
Director Office
Directorate of Colleges
Higher Secondary Education
Near District Court, Peshawar

Principal
Govt Girls Degree College
Chitral
Director of Colleges

ATTESTED
13/9

FEDERAL GOVERNMENT COLLEGE FOR WOMEN,
G-10/4, ISLAMABAD.

RELIEVING / REPORT.

- 1. No in Seniority List. NIL
- 2. Name of Government Servant. Mrs. Shela Ibrar
- 3. Designation. Lab Assistant
- 4. Domicile. Chitral (NWFP)
- 5. Qualification. B.A
- 6. Date of Birth. 09-08-1979
- 7. Scale of pay in full. BPS-07
- 8. Date of Appointment in Govt. Service. 01-07-1997
- 9. Date of Appointment in F.G. Service. 19-09-2006
- 10. Date of Appointment in the Present Grade. 19-09-2006
- 11. Date of Relieving. 15-07-2008
- 12. Hour of Relieving. Fore Noon
- 13. Reason for Relieving.
- 14. Institution to transferred. Government of NWFP, Higher Education Archives & Libraries Deptt Peshawar
- 15. Reference of Office Order No. FJ-1/2006/(CA-II)FDE
Dated:- 11-07-2008

SK
PRINCIPAL

Dated. 15/7/08

No. PE-2-212/06-30W/2/01

Copy forwarded to:-

- 7. The Director (A-II) FDE, Islamabad.
- 8. The A.G.P.R, Islamabad.
- 9. Person concerned.
- 10. Accountant of this college.
- 11. Personal File.
- 12. The Head of the institution to which transferred along with the service Book, LPC and leave account, The Govt. Servant has availed himself _____ days casual leave during the current year.

P. R. M. OKPAL
P. R. M. OKPAL
G. College for Women
G-10/4, Islamabad

ATTESTED

SK

To,

Date: 01/11/11

The Director,
Directorate of Colleges,
Civil Line Near District Court,
Peshawar

Sub: Request to Re-Join Lab Assistant Position in Girls College Chitral

Respected Sir,

Please refer to my 03 years deputation from Girls College Chitral to Federal Govt. Girls College Islamabad. As per instruction 03 years ago I had joined Federal Govt. Girls College F-10 Islamabad in the same capacity. After two months of my duty in the same capacity, Principal of the college called a meeting where I was ordered to render duty as Lab Attendant in place of Lab. Assistant. Against this illegal and unfair order I complained in writing to Secretary Education, Minister Education, Director General Education Federal Colleges, Director Education NWFP and Principal Girls College Chitral to take notice of my illegal transfer from Lab Assistant to Lab Attendant. After my repeated application I was received a letter with the advice to be present in front of enquiry team i.e. Principal H-8 College Islamabad. I explained my entire issues and the behavior of the Principal of F-10 College. Any decision made by the inquiry team could not be informed to me. Now I contacted with the Principal of Government Girls College Chitral to re-join my duty here, but I informed that a show cause notice has been issued to me.

Sir,

It is therefore, requested to allow me to re-join my duty in Girls College Chitral as Lab Assistant as I am working with this institution from the last 12 - 13 years. Your help in this connection will be highly appreciated. Besides my posting I further request to kindly take up my case with Directorate of Colleges Federal Govt Islamabad to release my salary of the period.

Best Regards,

SLI
Shehla Abrar
Lab. Assistant
Govt Girls College
Chitral.

CC: Principal, Government Girls College Chitral.

ATTESTED
13/11/11

*Director
After Rev. to
Return to
Colleges
24/11/11
Secretary
Govt. Dep'ty
Director
Peshawar*

H-24
Date: 30-11-2012

The Director (Colleges),
Khyber Pakhtunkhwa,
Civil Line, near District Courts,
Peshawar.

I, Shehla Abrar resident of Daneen Gahtak working Lab. Assistant with Govt Girls Degree College Chitral from the last 12 years. I was transferred to Federal Colleges Islamabad for 3 years on deputation. And I have worked with Federal College Islamabad. And after some time Principal of the College advised me to work in place of Lab Attendant. And I have refused to duty in the position of Lab Attendant and the same situation conveyed to parent department. Directorate of Colleges Peshawar and to the Principal Girls Degree College Chitral. In the same time I have complained in writing to Minister Education, Director-General Colleges Islamabad and copy to Director College Peshawar and Principal Girls College Chitral regarding change of my duty.

After two and half years I have received a letter from Federal College Islamabad to appear in front of inquiry team. I and Principal of the College appeared in front of Inquiry Team. But I have not intimated about the decision of the inquiry team. And my deputation case sent back to Directorate of Colleges, Civil Line, Peshawar.

Since, I have approached to Principal Govt Girls Degree College Chitral and Director Colleges Peshawar to get my joining. I have been told to wait they are going to issue notification for re-joining of my service with parent department Govt Girls College Chitral. After few months I have approached again to Principal Govt Girls Degree College Chitral to get my joining, she said that she has issued show cause notice to me surprised to see her reply, my home is in a distance of 20 steps from the college and the college is constructed in my land with concession rate, and the peon of the college is coming from my home, but it is not even informed to me at home, nor I have received any newspaper copy of the show case. Further I have approached to Principal GGDC Chitral to get my joining, she advised me to contact Deputy Director Mr. Sardar Hussain Sb. I have requested to Deputy Director to allow me to join my duty as Lab Assistant in Govt Girls Degree College Chitral. Deputy Director Mr. Sardar Hussain Sb got my request and said he will inform me for my joining, but not yet informed.

Despite my repeated request during deputation and after deputation I have not received any single reply from Principal Govt Girls Degree College Chitral nor from Directorate of Colleges Peshawar.

Now my case is pending with Directorate of Colleges, Civil Line near District Court Peshawar. You are kindly requested to keeping my more than 15 years experience to allow me, to work in my existing position and release my salary since deputation is backed to home department on July 16, 2008. Further attached here with complete correspondence record for your kind information.

ATTESTED

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Your help in this regard will be highly appreciated and I will assure my best possible work without any issue.

Regards,

Shehla
Shehla Abrar, 30/11/2012
Lab Assistant,
Govt Girls Degree College Chitral
Cell 03335137507 & 03345017704

C.C.

The Principal,
Govt Girls Degree College,
Daneen, Chitral.

ATTESTED

NS