

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,PESHAWAR
AT CAMP COURT, ABBOTTABAD

BEFORE: **KALIM ARSHAD KHAN** ... **CHAIRMAN**
SALAH UD DIN ... **MEMBER(Judicial)**

Service Appeal No.1473/2019

Date of presentation of Appeal.....04.11.2019
Date of Hearing.....28.02.2024
Date of Decision.....28.02.2024

Mst. Gul Bibi, Ex-Primary School Teacher at Government Girls Primary School, Baja Loohi, Tehsil Dassu, District Kohistan Upper.....**Appellant**

Versus

1. **Director** Elementary and Secondary Education Peshawar.
2. **District Education Officer (Female)** Kohistan at Dassu.
.....(**Respondents**)

Service Appeal No.1484/2019

Date of presentation of Appeal.....04.11.2019
Date of Hearing.....28.02.2024
Date of Decision.....28.02.2024

Mst. Farzana Wali, Ex-Primary School Teacher at Government Girls Primary School, Jhakh lohi, Tehsil Dassu, District Kohistan Upper.....**Appellant**

Versus

1. **Director** Elementary and Secondary Education Peshawar.
2. **District Education Officer (Female)** Kohistan at Dassu.
.....(**Respondents**)

Present:

Mr. Abdul Saboor Khan, Advocate.....For the appellants
Mr. Asad Ali Khan, Assistant Advocate General.....For respondents

APPEALS UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDERS NO.1198-1210 DATED 20.04.2019 AND 6302 DATED 08.10.2019 PASSED BY RESPONDENTS WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE OF APPELLANT ON THE GROUND OF ALLEGED UNSPECIFIED ABSENCE FROM DUTY WAS IMPOSED AND UPHELD.



SCANNED
KPST
Peshawar

CONSOLIDATED JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Through this single judgment, both the appeals, titled above, are going to be decided as both are similar in nature and almost with the same contentions, therefore, both can conveniently be decided together.

2. Brief facts of the cases, as per memorandum of appeals, are that the appellants were appointed as PSTs vide orders dated 01.12.2006 and 02.12.2006; that all of a sudden, the respondent No. 2 imposed penalty of removal from service and refund of salary received on the ground of alleged absence from duty vide order dated 20.04.2019; that feeling aggrieved, they filed departmental appeals on 15.05.2019 which were rejected vide order dated 08.10.2019. Hence, these appeals.

3. On receipt of the appeals and their admission to full hearing, the respondents were summoned, who put appearance and contested the appeals by filing written replies raising therein numerous legal and factual objections. The defense setup was a total denial of the claim of the appellants.

4. We have heard learned counsel for the appellants and learned Assistant Advocate General for the respondents.

5. The learned counsel for the appellants reiterated the facts and grounds detailed in the memo and grounds of the appeals while the learned Assistant Advocate General controverted the same by supporting the impugned order(s).

SCANNED
KPSJ
Peshawar

6. Record available before us indicates that the appellants was removed from service on account of their willful and unauthorized absence from duty. It further indicates that Independent Monitoring Unit (IMU) inspection team visited the schools where the appellants were posted, and the appellants were found absent from duty since long, but no report of IMU inspection was available with the comments of the respondents. The show cause notices issued to the appellants regarding their absence would show that the same were issued to the appellants on their school addresses, and an absent official cannot be served on his/her office address/duty station, therefore, the same were required to be served upon them on their home addresses. The proceedings initiated by the respondents show that the appellants have not been properly associated with the proceedings and no opportunity of defense has been granted to them. Besides, there is no mention of the period of absence in the show cause notice nor the same has been specified in the impugned order of removal from service. We have observed that the proceedings conducted by the respondents is not in accordance with law/rules.


7. In view of the above discussion the appeals in hand are allowed and the cases are remitted back to the department for de-novo inquiry with the direction that the appellants should be associated in the inquiry. A detailed, self-contained inquiry, fulfilling all codal formalities should be completed within sixty days of the receipt of this judgment. The appellants are reinstated in the service for the purpose of de-novo inquiry. The issue of back benefits shall be subject to the

Service Appeal No.1473/2019 titled "Mst. Gul Bibi -vs- Director Elementary & Secondary Education Peshawar and others" and Service Appeal No.1484/2019 titled "Mst. Furzana Wali -vs- Director Elementary & Secondary Education Peshawar and others", declared on 28.02.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Salah Ud Din, Member Judicial, Khyber Pakhtunkhwa Service Tribunal, Peshawar, at Camp Court, Abbottabad.

final outcome of the de-novo inquiry. Costs shall follow the event.
Copy of this judgment be placed in the file of connected Service Appeal No.1484/2019. Consign.

8. Pronounced in open Court at Abbottabad and given under our hands and the seal of the Tribunal on this 28th day of February, 2024.

SCANNED
KPS
Peshawar



KALIM ARSHAD KHAN
Chairman



SALAH UD DIN
Member (Judicial)

Mutazem Shah

ORDER


28th Feb. 2024

1. Learned counsel for the appellant and Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

2. Vide our consolidated judgment of today placed on file, the appeal in hand is allowed and the case is remitted back to the department for de-novo inquiry with the direction that the appellant should be associated in the inquiry. A detailed, self-contained inquiry, fulfilling all codal formalities should be completed within sixty days of the receipt of this judgment. The appellant is reinstated into service for the purpose of de-novo inquiry. The issue of back benefits shall be subject to the final outcome of the de-novo inquiry. Costs shall follow the event. Copy of the judgment be placed in the file of connected Service Appeal No.1484/2019.

Costs shall follow the events. Consign.

3. *Pronounced in open Court at Abbottabad and given under our hands and the seal of the Tribunal on this 28th day of February, 2024.*



(Salah Ud Din)

Member (J)
Camp Court, Abbottabad



(Kalim Arshad Khan)

Chairman
Camp Court, Abbottabad

Mutazem Shah


SCANNED
KRPST
Peshawar


29th Nov. 2023

1. Junior to counsel for the appellant and Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.
2. Former made a request for adjournment as senior counsel is not available today. Adjouruned. To come up for arguments on 28.02.2024 before D.B at Camp Court, Abbottabad. P.P given to the parties.

SCANNED
KPST
Peshawar

Adnan Shah


(Salah-Ud-Din)
Member (J)

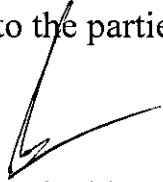

(Kalim Arshad Khan)
Chairman
Camp Court, Abbottabad


23.05.2023

Clerk of learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is indisposed today. Adjourned. To come up for arguments on 24.07.2023 before the D.B at Camp Court Abbottabad. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Muhammad Akbar Khan)
Member (E)
Camp Court Abbottabad


(Salah-ud-Din)
Member (J)
Camp Court Abbottabad


Naeem Amin


24.07.2023

Clerk of learned counsel for the appellant present. Mr. Abdul Haq, Budget Officer alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant sought adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 29.11.2023 before the D.B at Camp Court Abbottabad. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Rashida Bano)
Member (J)
Camp Court Abbottabad


(Salah-ud-Din)
Member (J)
Camp Court Abbottabad

Naeem Amin

22.9.22

*This case is fixed for 25.1.2023
for the same.*



25.01.2023

Clerk of counsel for the appellant. Muhammad Jan learned District Attorney for respondents present.

Former requested for adjournment on the ground that learned counsel for the appellant is busy before august Supreme Court of Pakistan. Adjourned. To come up for arguments on 29.03.2023 before D.B at camp court, Abbottabad.

SCANNED
KP ST
Peshawar



(Fareeha Paul)
Member (E)
Camp Court Abbottabad



(Rozina Rehman)
Member (J)
Camp Court Abbottabad

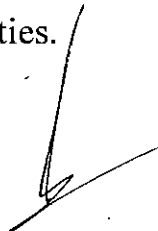
29.03.2023

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

Being not prepared, learned counsel for appellant made a request for adjournment. Adjourned. To come up for arguments on 23.05.2023 before D.B at Camp Court, Abbottabad. Parcha Peshi given to the parties.

SCANNED
KP ST
Peshawar



(Muhammad Akbar Khan)
Member (E)
Camp Court, A/Abad



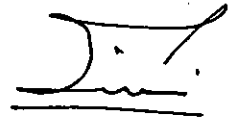
(Rozina Rehman)
Member (J)
Camp Court, A/Abad

22.12.2021

Learned counsel for the appellant present and stated that security and process fee have not been deposited due to having no knowledge of the same and in this respect, he submitted an application for allowing him to deposit the same. The application is placed on file in connected Service Appeal No. 1483/2019, which is accepted and the appellant is directed to deposit security and process fee within seven working days from today. After the requisite deposit, notices be issued to the respondents for submission of written reply/comments on 17.02.2022 before the S.B at Camp Court Abbottabad.

Appellant Deposited
Security & Process Fee

29/12/21



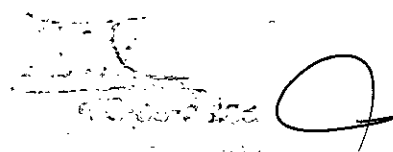
(Salah-Ud-Din)
Member, (J)
Camp Court Abbottabad

21st July 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG and Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Shah Wali Ullah, Computer Operator for the respondents present.

Written reply on behalf of the respondents not submitted. Representative of the respondents seeks time to submit written reply/comments. Last chance is given to the respondents to submit written reply/comments within fifteen days in office, failing which their right for submission of written reply shall be deemed as struck of. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.

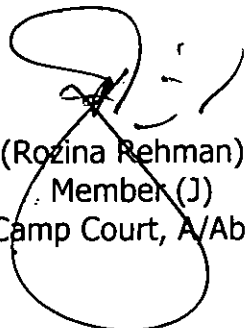
SCANNED
KPST
Peshawar



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

17.03.2021 Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on 13.07.2021 before S.B at Camp Court, Abbottabad.


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

13.07.2021 Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 13.10.2021.

Reader

13.10.2021 None is present on behalf of the appellant.

Security and process fee have not been deposited, therefore, notices could not be issued to the respondents. Notice be issued to the appellant/counsel to deposit the security and process fee within 07 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on next date positively, otherwise their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 22.12.2021 before the S.B at at camp court, Abbottabad.




Chairman
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on
18 / 9 / 20 at camp court abbottabad.


Reader

18.09.2020

Appellant has not forth come in person however, the clerk of the counsel did appear. According to him Mr. Abdul Saboor Khan learned counsel for the appellant has proceeded to District Kohistan for attending a case in the Model Court situated there, therefore, requested for adjournment. The appeal is adjourned to 14.12.2020 on which to come up for preliminary hearing before S.B at Camp Court, Abbottabad.

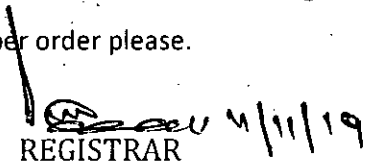

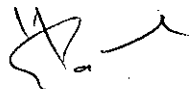

(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1473/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/11/2019	<p>The appeal of Mst. Gul Bibi received today by post through Mr. Abdul Saboor Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	24.01.2020	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-1-20</u></p> <p> CHAIRMAN</p> <p>Clerk to counsel for the appellant present and seeks adjournment on the ground that learned counsel for the appellant is not in attendance. Adjourn. To come up for preliminary hearing on 20.03.2020 before S.B at Camp Court Abbottabad.</p> <p> Member Camp Court, A/Abad</p>

**SCANNED
KPST
Peshawar**

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 1473 of 2019

Mst. Gul Bibi.....**Appellant**

VERSUS

Director Elementary and Secondary
Education Peshawar etc**Respondents**

APPEAL

INDEX

S#	Description of documents	Annexure	Page#
1.	Memo of Appeal	-	1-6
2.	Affidavit	-	7
3.	Correct address of Parties	-	8
4.	Copy of appointment order dated 02.12.2006.	"A"	9
7.	Copy of impugned order dated 20.04.2019.	"B"	10-11
8.	Copies of Departmental appeal and impugned order dated. 08.10.2019.	"C&D"	12-13
9	Wakalt Nama	-	14

Dated 29.10.2019


MST. GUL BIBI
(Appellant)

Through:-


ABDUL SABOOR KHAN
Advocate High Court

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 147 of 2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1545

Mst, Gul Bibi, Ex-Primary School Teacher at
Government Girls Primary School, Baja
loohi, Tehsil Dassu, District Kohistan upper.

Dated 04-11-2019

.....Appellant

VERSUS

- 1) Director Elementary and secondary
Education Peshawar.
- 2) District Education officer (Female)
Kohistan at Dassu. ✓

.....Respondents

Filed to-day

Registrar

04/11/19

APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL, ACT, 1974
AGAINST THE IMPUGNED ORDERS NO
1198-1210 DATED 20.04.2019 AND
6802 DATED 08.10.2019, PASSED BY
RESPONDENTS WHEREBY MAJOR
PENALTY OF REMOVAL FROM
SERVICE OF APPELLANT ON THE
GROUND OF ALLEGED UNSPECIFIED
ABSENCE FROM DUTY WAS IMPOSED
AND UPHELD.

PRAYER:-

On acceptance of the instant service appeal, the impugned orders bearing No 1198-1210 dated 20.04.2019 and 6802 dated 08.10.2019, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

Respectfully Sheweth:-

1. That, appellant was appointed in a prescribed manner by competent authority against the post of Primary school Teacher vide appointment order dated 02.12.2006.

(Copy of appointment order dated 02.12.2006, is annexed as Annexure "A").

2. That, all of a sudden, respondent No 02 without citing any reason and intimation straightaway, with a single stroke of pen imposed Major penalty of removal from service upon appellant w.e.f. 01.04.2018 on the ground of alleged unspecified absence from duty, vide impugned order No. 1198-1210 dated 20.04.2019.

(copy of impugned order dated 20.04.2019 is annexed as Annexure "B").

3. That, appellant filed a Departmental appeal on dated 15.05.2019, with respondent No 02, which was rejected vide impugned combined order no 6802 dated 08.10.2019. Which too was rejected without hearing the appellant.

(Copies of Departmental appeal dated 15.05.2019 and impugned order dated. 08.10.2019 are annexed as Annexure "C&D" respectively).

4. That, felling aggrieved from the impugned orders dated 20.04.2019 and 08.10.2019, appellant having no other remedy files the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds..

GROUND:-

- A) That, appellant never remained absent as alleged and the entire illegal proceedings were carried out fictitiously, while sitting in office by respondent No 02 out of mala-fide.
- B) That, before imposing the impugned penalty, no publication as required under rule 9 of E&D, Rules, 2011, was ever made in the leading newspapers, commonly available in the District of the appellant. The reference of news

papers publication in the impugned order are not commonly available in the area of the appellant, hence, the impugned order is wholly illegal, unlawful, without lawful authority and of having no legal effect.

- C) That, no show cause notice was ever issued and the entire proceedings were fictitiously conducted by respondent No 02 at the back of the appellant.
- D) That, no inquiry into the alleged allegations was ever conducted and the impugned penalty was imposed without having the allegations proved.
- E) That, appellant was never confronted with the alleged allegations at any point of time, condemning her unheard.
- F) That, before passing the impugned order, appellant was not put on notice to present his view point/explanation under the Doctrine of **AUDI AULTEM PARTEM**, hence, the impugned order is not sustainable and maintainable under the law on this very sole ground.
- G) That, no evidence worth name was attempted to collect by respondent No 02 against the appellant for alleged absence from duty and he has been


condemned on flimsy and perverse grounds with mala-fide intention.

- H) That, appellant had a long unblemished service record at her credit and she has been removed from service with a single stroke of pen without observing due process of law and having the allegations proved.
- I) That, no complaint was ever filed by any one against the appellant for her being absent from duty as alleged on any working day with any authority.
- J) That, the impugned order on its very face value, is illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect.

PRAYER:-

On acceptance of the instant service appeal, the impugned orders bearing No 1198-1210 dated 20.04.2019 and 6802 dated 08.10.2019, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

Dated 29.10.2019


MST. GUL BIBI
(Appellant)

Through:-


ABDUL SABOOR KHAN
ADVOCATE HIGH COURT

VERIFICATION :

I, Mst. GUL BIBI, Ex-Primary School Teacher at Government Girls Primary School, Baja loohi, Tehsil Dassu, District Kohistan upper, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.


MST. GUL BIBI
(DEPONENT)

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No _____ of 2019

Mst. Gul Bibi..... **Appellant**

VERSUS

Director Elementary and Secondary
Education Peshawar etc **Respondents**

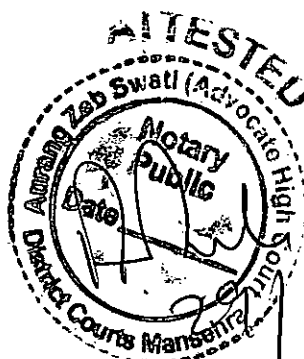
APPEAL

AFFIDAVIT

I, Mst. Gul Bibi, Ex-Primary School Teacher at Government Girls Primary School, Baja Loohi, Tehsil Dassu, District Kohistan upper, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. That the contents of fore-going affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

Dated: 29.10.2019

Gul Bibi
MST. GUL BIBI
(DEPONENT)



BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No ____ of 2019

Mst. Gul Bibi,.....**Appellant**

VERSUS

Director Elementary and Secondary
Education Peshawar etc**Respondents**

APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT:

Mst, Gul Bibi, Ex-Primary School Teacher at
Government Girls Primary School, Baja
loohi, Tehsil Dassu, District Kohistan upper.

RESPONDENTS:

- 1) Director Elementary and secondary
Education Peshawar.
- 2) District Education officer (Female)
Kohistan at Dassu.

Dated 29.10.2019


MST. GUL BIBI
(Appellant)

Through:-


ABDUL SABOOR KHAN
Advocate High Court

Accepted
19/08/19
OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

P. (10)

Annex (B)

NOTIFICATION

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

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

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

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

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

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

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

Endst No: 1198-1210 Dated: 20-04-2019

Copy for Information to:

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

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

Requested
29/10/2019

P
9
Annex
A

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY
KOHISTAN AT.**

APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee (the competent authority has been pleased to appoint the following (Female) FA/FSc: Passed (Untrained) Fresh candidates of Tehsil Dassu/ Pattani Palas (Union Council wise) against the vacant Posts of PTC in BPS-06 (Rs.2485-125-6235) Fixed plus usual allowances as admissible under the rules, on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

S.No	Name of candidate	Father's Name	Residence U/C	Appnt as	School where posted	Remarks
1	Gul Bibi	Baz Mir Khan	Baryal	PTC	GGPS Dadboon	A.V Post

CONDITIONS:-

Their appointments are purely on temporary basis and liable to termination at any time / stage with out assigning any reason/notice.
Their Certificates if not verified earlier, should be verified by the DDO (F) ie Mr. Abdur Rahman I/C Dy: D.O (F) S&L Kohistan before handing over their charge.
Charge reports should be submitted to all concerned.
No TA/DA is allowed to any one.
They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belongs.
In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.

They should not be allowed to take over charge if their age is less than 18-years and above 28-years

They should produce age and health certificate from EDO Health Kohistan before taking of charge.

-sel-
Executive District Officer
Schools & Literacy Kohistan

Endst: No. *8702-8* / App/PTC (F) U/C wise Merit /2006 Dated Kohistan the *2/12* /2006.

Copy of the above is forwarded to:-

- 1 Director Schools & Literacy NWFP Peshawar.
- 2 P/S to Minister of Education NWFP Peshawar.
- 3 P/S to Secretary Government of NWFP (S & L) Department Peshawar.
- 4 District Nazim Kohistan
- 5 District Coordination Officer Kohistan with reference your Notification No.10232-36 dated 20/11/2006 & 10407-10 dated 24/11/2006
- 6 District Accounts Officer Kohistan.
- 7 District Officer Schools & Literacy Kohistan.
- 8 Deputy District Officer (F)S&L Kohistan.
- 9 Candidates concerned.

[Signature]
Executive District Officer
Schools & Literacy Kohistan

Accepted
29/15/19

بخدمت جناب ڈائریکٹر صاحب E&SE خیبر پختونخواہ پشاور

P
12
C

عنوان: اپیل برخلاف آڈر نمبر Endst No.1190-1210 مورخہ 20.04.2019

- جناب عالی! گزارشات حسب ذیل پیش ہیں۔
- (۱) یہ کہ سائلہ 1-1-2006 سے محکمہ تعلیم میں اور تاحال GGPS باجوہ کوہستان میں بطور PST گزشتہ 13 سالوں سے اپنے فرائض سرانجام دے رہی ہے۔
 - (۲) یہ کہ دوران سروس کبھی بھی سائلہ کو نہ غیر حاضر پایا گیا نہ اسکے خلاف کسی قسم کی کوئی محکمانہ شکایت آئی ہے۔
 - (۳) ایہ کہ غیر حاضری کے بارے میں سائلہ کو کوئی علم نہیں اور نہ بتایا گیا ہے کیونکہ سائلہ ریگولر اپنی ڈیوٹی سرانجام دے رہی ہے۔
 - (۴) یہ کہ جب کبھی بھی محکمہ تعلیم سے کوئی شوکار نوٹس ہوا تو سائلہ نے بروقت اسکا جواب دیا ہے مگر محکمہ کے افسران نے اسے دیکھنے کی کوئی ضرورت محسوس نہ کی۔
 - (۵) یہ کہ اچانک ایک Letter نمبر 1198-1210 مورخہ 20.04.2019 موصول کر کے حیرت ہوئی کہ سائلہ کو ملازمت سے برطرف کر دیا گیا ہے۔
 - (۶) یہ کہ دفتر سے یکطرفہ فیصلہ کر کے سائلہ کو سروس سے برخاست کیا گیا ہے اسی دوران نہ تو کوئی انکوائری ہوئی ہے اور نہ سائلہ کو پرسنل ہیئرنگ کیلئے بلایا گیا ہے۔
 - (۷) یہ کہ سائلہ کے ساتھ نہایت زیادتی ہوئی ہے سائلہ کے چھوٹے چھوٹے بچے ہیں، نہایت ہی غریب خاندان سے اور پسماندہ علاقے سے تعلق رکھتی ہے۔
- لہذا استدعا کی جاتی ہے کہ مندرجہ بالا عنوان کی روشنی میں سائلہ کا برخاستگی کا حکم نامہ ختم کر کے سائلہ کو اپنی پوسٹ پر بحال کرنے کا حکم صادر فرمایا جائے تو سائلہ تاحیات دعا گو رہے گی۔

عمل میں بہتر صورت پر پرائمری سکول باجوہ ڈائریکٹریٹ

Dated 15/5/19 -

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 6902 / F.No.324/F/Appeal Kohistan

Dated Peshawar the 02/10/2019

To

The District Education Officer,
(F) Kohistan

Subject:- APPEALS REGARDING REMOVAL FROM SERVICE

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

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

Endst No. _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

وکالت نامہ

بعدالت جناب سروس ٹریبونل KPK پشاور

حکومت خیبر پختونخواہ وغیرہ

بنام

گل بی بی

سروس اپیل

اپیلانٹ

باعث تحریر آئیکہ!

منجانب:

عبدالصبور خان ایڈووکیٹ ہائی کورٹ

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیروی و جواب دہی بمقام پشاور ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رڈیز و عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پکھری کے آگے یا پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپرد وراثی و راضی نامہ و دستبرداری و اقبال و دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتنا ہی یا فیصلہ ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا ہوگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا ایڈووکیٹ کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پر داختمہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 29.10.2019

گل بی بی سابقہ پرائمری سکول ٹیچر گورنمنٹ گرلز پرائمری سکول بلوچہ لوئی تحصیل داسو ضلع کوہستان اپر

(اپیلانٹ)

Attested & Accepted

Abdul Saboor Khan

Advocate High Court

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

APPEAL No 1473 OF 2019

Mst. Gul Bibi

Appellant

VERSUS

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

Respondents


SCANNED
KPTST
PESHAWAR
14/11/23

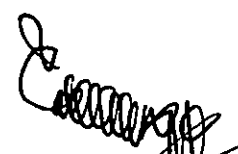
PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENT NO.1, 2.

INDEX

S#	Particulars of documents	Annexure	Pages
1	Comments along with affidavit		1-5
2	Copy of IMU report, SDEO report, show cause notices, Absentee notice and newspaper cutting etc	"A"	6-13
3	Copy of rejection of appeal by the appellate authority	"B"	14
4	Copy of Removal order	"C"	15-16

Dated 06-11-2023

29-11-23
Abdul



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

Abdul Haq
I/c DEO(F) Kohistan
Upper

SCANNED
KPST
Peshawar
14/11/23

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

APPEAL No 1473 OF 2019

Mst. Gul Bibi -----

Appellant

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 8991

Dated 14-11-23

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

Respondents

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

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

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

Factual Objections:

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

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

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

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

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

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

GROUND

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

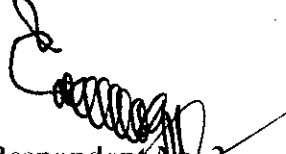
- C- Incorrect strongly denied that the show cause notice was issued to the appellant as well as issued her absence notice in the newspapers in which the allegation have been proved upon him as stated in Para 2 above of factual objections.
- D- Incorrect strongly denied that the appellant absence was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

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


DIRECTOR

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Dr. Muhammad Iqbal


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

Abdul Hal
He DEAF, Kohistan
Upper.

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

APPEAL No 1473 OF 2019

Mst. Gul Bibi _____

Appellant

VERSUS

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

Respondents

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

AFFIDAVIT

I, Mr. Abdul Haq ^{1/e} DEO (F) Kohistan Upper, is hereby solemnly affirm and declare that the contents of foregoing comments of the appeal No. 1473/2019 titled Mst. Gul Bibi versus Govt: of KPK are true and correct to the best of my knowledge and belief and nothing is being suppressed from the Honorable Tribunal.

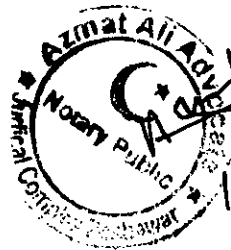
It is further stated on oath that in this appeal the answering respondents have neither been placed on party nor their defence has been struck off.

[Signature]
DEPONENT

13403-DIS/115-1

*Abdul Haq
1/e DEO (F)
Kohistan Upper*

ATTESTED



14-11-2023



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

AUTHORITY LETTER

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

Director

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Name gul bari Father Name Bazraf Khan Designation PST / PST Gender Female
Date Of Appointment 12. Feb. 2006 Highest Qualification Level Subject Other BPS 4 Disability No

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

[Handwritten signature]

The Dy DED (F) Kohistan

22/01/19

(7)

22/01/19

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (Female) DASSU

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

To,

The District Education Officer,
(Female) Kohistan.

SUBJECT; - RE-SUBMITT OF ABSENT TEACHERS REPORT.

Memo:-

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

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

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

Handwritten signature

Sub Divisional Education Officer,
(Female) Dassu



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN

FINAL SHOW CAUSE NOTICE

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

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

Endstt: No 273 /Dated Kohistan the 26/01 /2019
Copy of the above is forwarded to the:-

1. Mst: Gul Bibi PST - Baya Lahi

No.1217

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

Rs. Ps.

35 00

COMPETENT AUTHORITY
(District Education officer)
(F) Kohistan

[Handwritten signature]

Received a registered* addressed to _____ Date-Stamp _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Initials of Receiving Officer: [Signature]

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

Insurance fee Rs. _____ Ps. _____ (in words) _____ Kilo/ Grams _____

Name and address of sender: _____

01/01/2019

4

No.1425 For Insuran Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide, or of which no acknowledgement is due.

Received a registered* addressed to _____

Initials of Receiving Officer: _____

Insured for Rs. (in figures) _____

Insurance fee Rs. _____ Name and _____

(9)

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

No. 465

(78)

Dated 18-2 /2019.

(Signature)

To,
The Deputy Director information
Khyber Pakhtunkhwa Abbottabad

Subject; FINAL SHOW CAUSE NOTICE
Memo;

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

(Signature)
District Education Officer
(Female) Kohistan.

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

Dated 18/2/2019

Copy forwarded to-

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

(Signature)

(Signature)
District Education Officer
(Female) Kohistan.

DDED (F)
Sd/-
18/2/19

No. 1425

For Insurance Notices see reverse.

Stamps affixed except in case of "parcel" or "parcel" unopened letters of not more than 100gms weight, which are not to be opened by the Post Office. The acknowledgment is due.

Received at _____

Addressed to _____

Date of delivery _____

Signature of Receiving Officer _____

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

Weight _____ Kilo _____ Grams _____

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

Name and _____

(9)

(10)

(10)

(10)

نوٹس غیر حاضری

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

نمبر شمار	نام	مقام ڈیوٹی
1	گدھہ PST	GGPS پشوت
2	صدف زیب PST	GGPS پشوت
3	راقیہ PST	GGPS سیرگرھی
4	غاسمہ PST	GGPS سیرگرھی
5	فرزانہ والی PST	GGPS جمناخ لوہی
6	شامین ضمیر PST	GGPS لوہی دادیر
7	گل بی بی PST	GGPS بادی لوہی
8	نزهت آرا PST	GGPS ہریں کوٹ
9	تہینہ وحی PST	GGPS گوزکومیلا
10	زہرا بی بی PST	GGPS خزانہیل دادیر
11	ناگینہ اوتیل PST	GGPS بادی لوہی
12	شگفتہ کیرن PST	GGPS ڈوپ لوہی

Shawal

19/1/19

(5)

(17)

Divisional Educa.
ce issued show cau.
dites nor submit
ed for personal inc.
teachers in time.
pers i.e. Dau.
hers were
ended

GGPS سیرال شاہ	نگل بی بی PST	13
GGPS کیمیا آباد	PST زرینہ	14
GGPS کیمیا آباد	سلو بی بی PST	15
GGPS سیران آباد	PST شاکیرہ	16
GGPS گی ہرین	PST معصومہ	17
GGPS گی ہرین	PST لطیفہ	18
GGPS برک	جوہا جہ بی بی PST	19
GGPS سیر ٹو کنڈیا	PST راشدہ بانو	20
GGPS سیری گہریال	PST ربیحانہ	21
GGPS سیری گہریال	PST سارہ قیوم	22
GGPS سویال شوی	PST عائشہ صادق	23
GGPS اوسے ج	بی بی ہوا PST	24
GGPS بھٹی کوز شریال	PST فہمیدہ	25
GGPS بھٹی کوز شریال	PST بشریہ	26
GGPS موکن آباد	PST سلو	27
GGPS سگا آباد	PST صفیہ زرین	28
GGPS سگا آباد	PST تاجید سرتاج	29
GGPS برسر شریال	PST مہناز	30

Court Case ←

Handwritten signature and initials

Handwritten date: 19/11/19

(6)

127

127

38

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

آپ کو آپ کی غیر جانبدار کی طرف سے تاریخ کے اندازہ کے خلاف E&D نمبر شمار

1

2

3

4

5

6

7

8

9

10

11

12

ہماری سرکاری خبریں اور معلومات کے لیے ہمیں اپنے اخبار کو پڑھیں۔ ہمارے اخبار میں ہر روز کی خبریں اور معلومات کے لیے ہمیں اپنے اخبار کو پڑھیں۔ ہمارے اخبار میں ہر روز کی خبریں اور معلومات کے لیے ہمیں اپنے اخبار کو پڑھیں۔

38

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

ہماری سرکاری خبریں اور معلومات کے لیے ہمیں اپنے اخبار کو پڑھیں۔ ہمارے اخبار میں ہر روز کی خبریں اور معلومات کے لیے ہمیں اپنے اخبار کو پڑھیں۔ ہمارے اخبار میں ہر روز کی خبریں اور معلومات کے لیے ہمیں اپنے اخبار کو پڑھیں۔

38

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

39

INF(AD)43

26/2/19

روزنامہ ہفت روزہ نیوز

Handwritten signature

70.14

received a regular... Insured

سپر ایجنسیوں کی وفاق اور پاکستان کی خیر مافیہ کاری

ایجنسیوں کے ساتھ کئے گئے ہیں اور ہم اپنے ملک کی خاطر کسی قربانی سے بھی دریغ نہیں کریں گے۔ اجلاس میں سنی
سپر ایجنسیوں نے اور پاکستان کی خیر مافیہ کاری کے سلسلے میں وفاق کی خدمات کے مطابق جس تمام تعاون نے حرکت کی اجلاس میں تمام ایجنسیوں
اجلاس میں سرکاری اور غیر سرکاری کے لیے قرار کو خود روئے وقت خان میں مٹا کر ایک اور پر بات چیت کی گئی اجلاس میں ہی سوائے
وفاق کے پیچھے رہنے والی کی قربانی سوائے وقت تمام اجلاس میں سنی مٹا کر ایک اور پر بات چیت کی گئی اجلاس میں ہی سوائے (44)



سابقہ ایجنسیوں کی ایک نئی نسل کا تیسرا اجلاس۔ تیسرا اجلاس پانچ روزہ، 25 مارچ تا 29 مارچ 2011ء میں منعقد ہوا۔ اس اجلاس میں سرکاری
اجلاس میں سنی اور غیر سرکاری کے لیے قرار کو خود روئے وقت خان میں مٹا کر ایک اور پر بات چیت کی گئی اجلاس میں ہی سوائے
وفاق کے پیچھے رہنے والی کی قربانی سوائے وقت تمام اجلاس میں سنی مٹا کر ایک اور پر بات چیت کی گئی اجلاس میں ہی سوائے (46)

وفاق کی سرگرمیاں

آپ کی خدمت میں وفاق کی سرگرمیوں کے سلسلے میں پیش کیا گیا ہے۔ اس سلسلے میں آپ کی فیڈبک کی ضرورت ہے۔
وفاق کی سرگرمیوں کے سلسلے میں پیش کیا گیا ہے۔ اس سلسلے میں آپ کی فیڈبک کی ضرورت ہے۔
وفاق کی سرگرمیوں کے سلسلے میں پیش کیا گیا ہے۔ اس سلسلے میں آپ کی فیڈبک کی ضرورت ہے۔

سلسلہ	نام	قائم ہوئی	تعداد	سلسلہ	نام	قائم ہوئی	تعداد
1	پست	GGPS	20	1	پست	GGPS	20
2	پست	GGPS	21	2	پست	GGPS	21
3	پست	GGPS	22	3	پست	GGPS	22
4	پست	GGPS	23	4	پست	GGPS	23
5	پست	GGPS	24	5	پست	GGPS	24
6	پست	GGPS	25	6	پست	GGPS	25
7	پست	GGPS	26	7	پست	GGPS	26
8	پست	GGPS	27	8	پست	GGPS	27
9	پست	GGPS	28	9	پست	GGPS	28
10	پست	GGPS	29	10	پست	GGPS	29
11	پست	GGPS	30	11	پست	GGPS	30
12	پست	GGPS	31	12	پست	GGPS	31
13	پست	GGPS	32	13	پست	GGPS	32
14	پست	GGPS	33	14	پست	GGPS	33
15	پست	GGPS	34	15	پست	GGPS	34
16	پست	GGPS	35	16	پست	GGPS	35
17	پست	GGPS	36	17	پست	GGPS	36
18	پست	GGPS	37	18	پست	GGPS	37
19	پست	GGPS	38	19	پست	GGPS	38

INF(AD)48 ڈیٹا کھولنے والی ایجنسیوں کی فہرست (زبانہ) ضلع کوہستان

لوڈنگ ایجنسیوں کی فہرست

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12

onoil.com
ANTS LLC

بریش ٹیکنالوجی ہا
اعلیٰ کوالٹی ہا
50311

Handwritten signature and notes.

14

13

(D)

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

No. 1202 / FNo. 324/F/Appeal Kohistan

Dated Peshawar the 02/10/2019

To

The District Education Officer,
(F) Kohistan

Subject:- **- APPEALS REGARDING REMOVAL FROM SERVICE**

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

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

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

Endst No. _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa

[Handwritten signature]

15

15

15

15

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

NOTIFICATION

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

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

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

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

Khurshid Ahmed

1

16

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

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

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

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

Copy for Information to:

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

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

20/4/19

[Handwritten signature]

2