

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

Service Appeal NO.183/2024

Mst. Nabeela Afridi (Ex) PST

.....Appellant.

VERSUS

District Education officer Mohmand (F) & others

.....Respondent.

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*Muzal*  
Deponent  
*Muzal*  
24.6.2024

Next Date  
27-6-2024

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**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

Service Appeal NO.183/2024

Mst. Nabeela Afridi (Ex) PST

.....Appellant.

VERSUS

District Education officer Mohmand & others

.....Respondent.

**Khyber Pakhtunkhwa  
Service Tribunal**  
Diary No. 13725  
Dated 25/6/24

**Para-wise comments on behalf of respondents No.1.2**

**Respectfully Sheweth.**

**Preliminary objections.**

- I. That the Appellant has no cause of action, locus standi to file the instant Appeal.
- II. That the Appellant has not come to this court with clean hands.
- III. That the Appellant has concealed material facts from the Honorable Tribunal.
- IV. That the Appeal is barred by law and limitation
- V. That the Honorable Tribunal has no jurisdiction.

**ON FACT.**

1. Pertains to record.
2. Pertains to record.
3. The appellant submitted application before the Director Elementary & Secondary Education (Ex-FATA) along with doubtful Noc on hand writing.
4. Para 4 related Director Education (Ex-FATA) and The District Education officer, Kohat
5. Para 4 related to the District Education officer, Kohat
6. The Appellant was absent from her duty and Respondent .2 removed her from service dated 8.10.2013 before her so called adjustment order dated 6.5.2014 of the Director Education (Ex) FATA. Therefore respondent refused to take charge in GPS mari kor from the appellant.
7. Elaborated in Para 6 in the fact.
8. Correct.
9. The judgment of the service appeal No.875/2019 E.P.No 58/2023 was implemented by the respondent and the E.P was consigned.
10. That in the light of the judgment of the honorable service tribunal proper inquiry was conducted and order was passed accordance to the recommendation of the inquiry officer. Copy of the report is attached. ( annexed-A)

**GROUND .**

- A. The order dated 23.5.2023 issued by the respondent as per law and rules .
- B. The appellant has been treated by the respondent as per law and rules not violated Article.4 and 25 of the constitution of Islamic Republic of Pakistan.
- C. The order issued dated 23.5.2023 by the respondent is accordance to the judgment of this honorable tribunal.
- D. The appellant was removed from service before the transfer order to F.R kohat on illegal NOC
- E. As elaborated in Para 10 of the fact.
- F. As elaborated in Para 10 of the fact.
- G. The appellant proceeded accordance of the judgment of this honorable Tribunal.
- H. The enquiry officer submitted detail inquiry report before the competent authority.

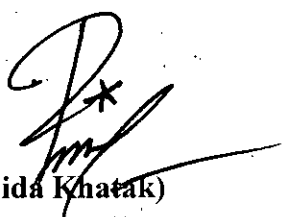
I. The respondents seek permission to advance other ground and proof at the time of hearing.  
It is, therefore, most humbly prayed that the appeal of the appellant may be dismissed

**Respondent.1**

  
( Mst. Samina Altaf )

**Director**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

**Respondent.2**

  
(Mst. Zubida Khatak)

District Education officer (F)  
District Mohmand  
District Education Officer (F)  
District Mohmand

**BEFORE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No.183/2024

Mr. Nabeela Afridi (Ex)PST District Mohmand

.....Appellant

**Versus**

Director Elementary and Secondary Education Khyber Pakhtunkhwa & others.

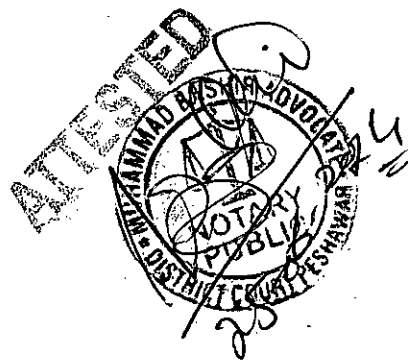
.....Respondents

**AFFIDAVIT**

I Zubida Khatak District Education officer (F) Mohmand do hereby declare and affirm on oath that above comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon, rabble Tribunal.

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

(Mst. Zubida Khatak )  
District Education officer (F)  
District Mohmand  
District Education Officer (F)  
District Mohmand



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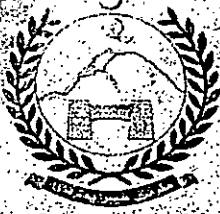
**DISTRICT EDUCATION OFFICE DISTRICT MOHMAND**  
**AUTHORITY LETTER**

I District Education officer (F) District Mohmand do hereby authorize Mr. Noor Bad shah Assistant (litigation) of this District Education office Mohmand to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of Para wise comments in service Appeal No 183/2024 Titled Nabeela Afridi VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.



(Mr. Zubida khatak )  
District Education officer (F)  
District Mohmand  
District Education Officer (F)  
District Mohmand

5



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) MOHMAND TRIBAL DISTRICT

Email: deomohmandfemale@gmail.com



No \_\_\_\_\_ Dated \_\_\_\_\_ 2023

**NOTIFICATION**

Consequent upon the recommendation of Inquiry Committee Office Mr. Wajeeh Uddin Ahmad Deputy Director (Estab/M) Elementary & Secondary Education (NMC) Khyber Pakhtunkhwa Endstt. No. Nil Dated Nil the Competent Authority is agreed to impose Major penalty of "REMOVAL FROM SERVICE" with immediate effect upon **Mst. Nabeel Afridi PST GGPS Marai Kor District Mohmand** In exercise of the power conferred under Rule 4 (b) II of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011.

(Abida Shaheen)  
District Education Officer (F)  
Mohmand Tribal District.

Endstt No. 4184-90 /Removal Dated 23/05/2023

Copy to:-

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. Deputy Commissioner Mohmand Tribal District
4. District Account Officer District Mohmand
5. DMO EMA District Mohmand
6. Pay clerk Local Office.
7. Teacher concerned.

District Education Officer (F)  
Mohmand Tribal District.

Almasad  
24.6.2024

Annex

(A)

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Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar



No. \_\_\_\_\_ Dated \_\_\_\_\_ /2023

**INQUIRY REPORT REGARDING SERVICE APPEAL# 875/2019-MST.  
NABEELA AFRIDI, EX PST GGPS MARI KOR, PANDIALI, DISTRICT  
MOHMAND V/S DIRECTOR E&SE KP AND OHTERS**

The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar has nominated the under signed as Inquiry Officer vide Notification issued under endorsement No. 16937-39 dated 07-12-2021 (Annexure-A) to dig out the facts pertaining to the Service Appeal# 875/2019, title Mst. Nabeela Afridi Ex PST GGPS Mari Kor (Pandiali) District Mohmand and decision of the honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar, rendered in Service Appeal# 875/2019 vide dated 22-09-2021 (Annexure-B).

**PROCEEDINGS OF THE INQUIRY:**

In the light of the above cited notification, the under signed visited the office of District Education Officer Mohmand on 13-01-2022 and asked him for submission of the following information:-

- i. Copy of 1<sup>st</sup> appointment order of the Ex PST.
- ii. Copy of her transfer order from GGPS Tarkhor Bajaur to GFCS Spinki Tangi District Mohmand
- iii. Copy of Removal from Service Order dated 18-10-2013
- iv. Copy of transfer order from District Mohmand to FR Kohat dated 05-05-2014
- v. Agency Education Officer (AEO) FR Kohat relieving order from FR Kohat to GGPS Mari Kor (Pindiali) Mohmand.
- vi. Show Cause Notices served upon the Ex PST.
- vii. Any other proceedings adopted during the course.
- viii. Copy of her Removal Order.

Due to non-submission of the mentioned information by the DEO concerned, the under signed once again asked the DEO vide letter No. 3574 Dated 30-03-2022 (Annexure-C) for provision of the requisite information, but nil response received from the DEO (F) Concerned (Annexure-D). However some relevant information pertaining to the subject case were collected from DEO Kohat, appellant and various sources from time to time which was the main cause of delay in the matter. Last information was collected from the appellant on eve of her personal hearing dated 02-03-2023 in the shape of copy of her Service Book, which was in custody of her since, 2012.

*M. Ahmad*  
*M. Ahmad*  
22.6.2024

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## FACTS OF THE INQUIRY:

- i. Mst. Nabeela Afridi D/O Karim Khan resident of village Feroz Khan Tehsil Dara Adam Khel FR Kohat had been appointed against the post of PST (BS-07) and posted at Govt. Girls Primary School Chagal District Bajaur by the Agency Education Officer Bajaur vide Appointment Order No. 4028-38 Dated 20-10-1993 (Annexure-E) and she took over charge on 25-10-1993. She availed 1143 days Extra Ordinary Leave (Leave without Pay) w.e.f. 08-10-1996 to 20-11-1997 and w.e.f. 01-12-1997 to 30-11-1999 respectively against the revised leave rules, 1981.
- ii. The Services of the said Ex PST were transferred from District Bajaur to GFCS Spinki Tangi District Mohmand by the Competent Authority vide Transfer Order No. 17858-62 Dated 06-08-2007 (Annexure-F) and took over charge at District Mohmand on 09-08-2007 (Annexure-G).
- iii. The AEO Mohmand imposed major penalty of Removal from Service upon the Ex PST on basis of her willful absence from the duties vide endorsement No. 18721-26 Dated 18-10-2013 (Annexure-H).
- iv. Prior to the issuance of her **Removal from Service Order vide dated 18-10-2013**, she got NOC from AEO Mohmand vide Dated **17-09-2013 (Annexure-I)**, on the direction of Director (FATA) Peshawar vide Dated **24-04-2014 (Annexure-J)**, the Agency Education Officer FR Kohat, adjusted her at GGMS Feroz Mela FR Kohat vide No. 833-35 Dated 05-05-2014 on temporary basis with immediate effect (Annexure-K). she submitted her arrival report to Headmistress GGMS Feroz Mela on 07-05-2014 (Annexure-L) although she was removed earlier from her service on 18-10-2013, and as per attendance register she performed her duty at the same School up to October, 2014 (Annexure-M), without drawing her salary.
- v. It is pertinent to mention here that after taking over charge on 07-05-2014 at GGMS Feroz Mela FR Kohat vide No. 833-35 Dated 05-05-2014 (Page-25 of Service Tribunal File), she took over charge on 26-05-2014 in GGPS Mari Kor District Mohmand ( Page-26 of the Service Tribunal File) at (Annexure-N).
- vi. On 11-06-2018 she also submitted an application to the Director of Education (FATA) as per page No. 27 of the Service Tribunal File, wherein she is stated that she was transferred to GGMS Feroz Mela FR Kohat, but was sent back to GGPS Mari Kor due to non-availability of vacant post at GGMS Feroz Mela FR Kohat (Annexure-O).
- vii. In the light of Service Tribunal Judgment Dated 04-03-2019, she submitted a Departmental Appeal to Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar on 25-03-2019, almost a lapse of Six Years of her Removal of Service Order Dated 18-10-2013, which was not honored (Annexure-P)
- viii. She filed a Service Appeal before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar on 03-07-2019 (Annexure-B) which was partially accepted by the Honorable Tribunal vide decision Dated 22-09-2021.

M. A. Q. A. S.  
24.8.2024



(8)



**FINDINGS OF THE INQUIRY:**

1. On attaining of two years, nine months & 18 days service, the Ex AEO Bajaur had been granted her Extra Ordinary Leave w.e.f. 08-10-1996 to 20-11-1997 and w.e.f. 01-12-1997 to 30-11-1999 (1143 days) leave without pay to the mentioned ex teacher against the existing leave rules.
2. She approached to the Director of Education (FATA) Peshawar for her transfer/adjustment to her native village Feroz Mela FR Kohat from District Mohmand on 18-04-2014 and 24-04-2014, in spite of the fact that a Major Penalty of Removal from Service had already imposed upon her by the Ex AEO Mohmand vide dated 18-10-2013.
3. Her Service Book has not been updated since 01-12-2012. The concerned authority has not been made any entry in her Service Book after 2012 i.e. Removal from Service etc.
4. Excluding three years extra ordinary leave already availed, as per Service Book, her total length of Service is about 16 years.
5. Going through all the record provided by the appellant, it was observed that the appellant misguided/misled the Honorable Khyber Pakhtunkhwa, Service Tribunal during the proceedings of her service appeal. In her supportive documents she claims that she took over charge at GGMS Feroz Mela on 07-05-2014 (Page-25 of Service Tribunal File), vide No. 833-35 Dated 05-05-2014 and perform her duties there till 31-10-2014 as (Annexure-M), but on Page-26 of the Service Tribunal file she shows her self taking over charge at GGPS Mari Kor District Mohmand, while on the same day and Six Months after that she perform duty at GGMS Feroz Mela FR Kohat which show clear contradiction.


**CONCLUSION/RECOMMENDATIONS.**

Keeping in view the facts/findings mentioned above, the undersigned concludes/recommends that:-

- 1. Disciplinary proceeding may be initiated against the Ex AEO Bajaur. As he had granted the Extra Ordinary Leave for three years to the Ex PST concerned against the leave rules.
2. Disciplinary proceeding may be initiated against the Officials/Officers of DEO Mohmand for not maintaining proper record in the instant case and not adopting proper procedure imposing the penalty upon the Ex PST.
3. The Major Penalty of Removal from Service imposed upon her vide Order No. 18721-26 Dated 18-10-2013 by District Education Officer Mohmand may be retained as intact.



**(MR. WAJEEH UDDIN AHMAD)**  
INQUIRY OFFICER/DEPUTY DIRECTOR (ESTAB/M)  
ELEMENTARY & SECONDARY EDUCATION (NMD)  
KHYBER PAKHTUNKHWA, PESHAWAR

  
24.6.2024



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Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
PH.No. 091-9210389, 9210938,  
091-9210437, 9210957, 9210468  
Fax 091-9210936

## NOTIFICATION

The competent authority is pleased to nominate Mr. Wajeeh ud-Din Deputy Director (M&E) local Directorate (as an inquiry officer) as to dig out facts about the Service Appeal No 875 in respect of Ms. Nabila Afridi EX-PST GGPS Mari Kor Pandyali District Mohmand

The Enquiry Officer is further asked to submit his report with clear /Solid Suggestions, recommendation within 07 days positively.

**Director**

Elementary and Secondary Education  
Khyber Pakhtunkhwa.

Endst.No. 16937-39 /Nabila Afridi Ex-PST Dated Peshawar the 27/12 2021  
Copy forwarded to the;-

1. Mr. Wajeeh ud-Din Deputy Director (M&E) local Directorate
2. District Education Officer (Female) Mohmand with the remarks to provide the entire relevant document in order to facilitate Enquiry proceeding.
3. PA to Director Education, NMD KPK.

*M. Wajeeh ud-Din*  
Deputy Director (Estab)  
Merged Districts  
27.12.21

*At lead  
rel B  
24.6.24*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**SERVICE APPEAL NO. 875 /2019**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 912

Dated 03/7/2019

Mst; Nabeela Afridi, PST,  
GGPS Mari Kor, Pandiali, District Mohmand.....**APPELLANT**

**VERSUS**

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Mohmand.
- 3- The District Education Officer, District Kohat.

.....**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
ORDER DATED 18/10/2013 COMMUNICATED TO THE  
APPELLANT ON 04/03/2019 DURING PROCEEDINGS BEFORE  
THIS AUGUST TRIBUNAL IN APPEAL NO. /2018  
AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL  
APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF  
NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 18.10.2013 communicated to the appellant on 04/03/2019 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That the appellant was initially inducted in the respondent Department as PST in the year 1993. That right from appointment the appellant served the respondent Department at far flung areas of FATA quite efficiently and up to the entire satisfaction of her superiors. Copy of the service book is attached as annexure ..... **A.**
- 2- That during service the appellant was transferred and posted at GFCS Spinki Tangi, Mohmand Agency from GPS Tarkho, Bajaur Agency vide order dated 6/08/2007. That in pursuance of the above mentioned order the appellant submitted her charge report and started performing her duty at concerned station with zeal and zest. That it is pertinent to mention that the concerned authority also issued LPC to the appellant. Copies of the order and charge report are attached as annexure ..... **B & C.**

(Scribbled mark)

- 3- That during service at Mohmand Agency the appellant was transferred from one station to another quite regularly and as such being obedient to high ups the appellant complied all the orders and had performed her duties quite efficiently and with devotion. Copies of the posting orders and charge reports are attached as annexure ..... **D.**
- 4- That being the bonafide resident of FR Kohat the appellant submitted applications for her transfer to her home Agency/District in light of section-3 of the transfer/posting Regulatory Act, 2011. That in response the respondent No.1 directed the respondent No.3 to adjust the appellant against the post of PST at FR Kohat. Copies of the applications are attached as annexure ..... **E.**
- 5- That vide order dated 5.5.2014 the appellant was adjusted against the post of PST at GGMS Feroz Mela FR Kohat. That in compliance the appellant submitted her charge report and started her duty at the satiation with devotion. Copies of the order and charge report are attached as annexure ..... **F & G.**
- 6- That appellant after serving for some time at GGMS Feroz Mela, FR Kohat the respondent No.3 relieved the appellant and directed her to report back to her previous place of posting i.e. GGPS mari kor, accordingly the appellant submitted her arrival report at GGPS mari Kor, Mohmand Agency but the same was refused by the Head mistress as well as by the respondent No.2 without showing any reason and justification. Copy of the arrival report is attached as annexure ..... **H.**
- 7- That since then the appellant is requesting the respondents for adjustment against the post of PST at GGPS Mari Kor, Mohmand Agency and this regard the appellant lastly submitted her Departmental appeal before the respondent No.1 but of no avail. Copy of the Departmental appeal is attached as annexure ..... **I.**
- 8- That appellant feeling <sup>aggrieved</sup> filed service appeal No. 1172/2018 before this august Tribunal and during proceedings in the above mentioned service appeal the respondent Department submitted the impugned order dated 18.10.2013 which was communicated to the appellant on 04.03.2019 whereby the appellant was removed from service. Copies of the merno of appeal and impugned order are attached as annexure..... **J & K.**
- 9- That appellant feeling aggrieved from the impugned order dated 18.10.2013 preferred Departmental appeal but no reply has been received so far hence the present appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure..... **L.**

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**GROUNDS:**

- A- That the impugned order dated 18.10.2013 issued by the respondents 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 the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan-1973.
- C- That the respondents acted in arbitrary and malafide manner while issuing the impugned order dated 18.10.2013.
- D- That the respondent Department transferred the appellant to FR Kohat where she was posted on temporary basis in GGPS Feroz Mela FR Kohat, but the respondent Department inspite of knowing the fact issued the impugned order dated 18.10.2013 on account of absentia.
- E- That no charge sheet and statement of allegation has been served on the appellant before issuance of the impugned order dated 18.10.2013.
- F- That no show cause notice has been served on the appellant before issuing the impugned order dated 18.2013.
- G- That chance of personal hearing/defense has been provided to the appellant which is mandatory under the law and rules.
- H- That no regular inquiry has been conducted in the matter of the appellant which is mandatory as per judgments of the Honorable Supreme Court of Pakistan before taking punitive actions against the civil servants.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 02.07.2019

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24.6.24

**APPELLANT**  
*Handwritten signature*  
**NABEELA AFRIDI**

**THROUGH:**  
**NOOR MOHAMMAD KHATTAK**  
&  
**MIR ZAMAN SAFI**  
**ADVOCATE**



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 875/2019

Date of Institution ... 03.07.2019

Date of Decision ... 22.09.2021

Mst. Nabeela Afridi, PST, GGPS Mari Kor, Pandiali, District Mohmand  
... (Appellant)

VERSUS

The Director (E&SE) Government of Khyber Pakhtunkhwa, Peshawar and  
two others. ... (Respondents)

Present.

Mr. Noor Muhammad Khattak,  
Advocate. ... For appellant.

Mr. Muhammad Adeel Butt,  
Addl. Advocate General ... For respondents.

MR. AHMAD SULTAN TAREEN ... CHAIRMAN  
MRS. ROZINA REHMAN, ... MEMBER(J)

JUDGMENT

AHMAD SULTAN TAREEN, CHAIRMAN:-The appellant named above invoked the jurisdiction of this Tribunal through service appeal described above in the heading challenging thereby her removal from service dated 18.10.2013, communicated to her on 04.03.2019 during proceedings before this Tribunal in Service Appeal No. 1172/2018.

2. The factual account as given in the memorandum of appeal is summed up as hereafter follows. The appellant was appointed as PST in the respondent department in the year, 1993. She while serving at GPS

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Tarkho Bajaur Agency was transferred and posted at GFCS Spinki Tangi Mohmand Agency, vide order date 06.08.2007. The appellant assumed charge at her new assignment and started performing her duty. LPC was also issued in her favour by the concerned authority. The appellant was then transferred to GGPS Mari Kor District Mohmand Agency. The appellant being bonafide resident of FR Kohat submitted application to the Director, E&SE Department, Khyber Pakhtunkhwa Peshawar on 17.09.2013 under Section 3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 for her permanent transfer to home District. In response to the said application, the District Education Officer, Kohat was directed to adjust the appellant against the post of PST at FR Kohat. Vide order dated 05.05.2014, the appellant was adjusted against the post of PST at GGMS Feroz Mela, FR Kohat. The appellant assumed the charge on 27.05.2014 and started performing her duty. After serving for some time in the said school, respondent No. 3 relieved her and directed to report back to her previous assignment. The appellant went to GGPS Mari Kor District Mohmand for submitting arrival report which was refused by the Headmistress. Since then the appellant agitated her grievance before the concerned authorities but in vain. Lastly, she filed departmental appeal on 11.06.2018 before respondent No. 1 which elicited no response. Ultimately, the appellant approached this Tribunal through Service Appeal at hands. After admission of the appeal for regular hearing the respondents were given notices. They after attending the proceedings have filed the written reply refuting the claim of the appellant.

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3. We have heard the arguments and perused the record.

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4. The appointment of the appellant in the respondent department in the year, 1993 and her continuous service thereafter has not been specifically denied in parawise comments filed on behalf of the respondents No. 1 & 2. Similarly account of her transfers given by the appellant that she was transferred to GFCS Spinki Tangi Mohmand Agency from GGPS Tarkho, Bajaur Agency followed by issuing of LPC is also not denied. The fact of rendering service by the appellant at Mohmand Agency is also not disputed. The dispute relates to the version of the appellant that she being bonafide resident of Kohat, submitted application for her transfer to her home Agency/District in the light of Section 3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 and the respondent No. 1 directed the respondent No. 3 to adjust the appellant against the post of PST at FR Kohat. There is note of "no objection" recorded by A.E.O Mohmand Agency on application of the appellant as available on record. The copy of office order dated 05.05.2014 issued by Agency Education Officer, FR Kohat is also available on file as annexed with the Memorandum of Appeal. According to the order dated 05.05.2014, the appellant was adjusted in GGMS Feroz Mela FR Kohat on temporary basis with immediate effect till further order, in pursuance to direction of the Director of Education FATA Warsak Road, Peshawar. However, the respondent No. 1 and 2 in their Parawise comments did not admit the correctness of facts stated in Para-4 of the Memorandum of Appeal and denied the same. It was added on behalf of the said respondents that the duration, during which the appellant claims that she submitted application for her transfer, she was already removed from service and her salary was also stopped w.e.f. 01.07.2012. The copy of

*Removal*

*[Signature]*

*24.6.21*



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the order showing removal of the appellant from service has been annexed with the Parawise comments. The order dated 18.10.2013 as to removal of the appellant as referred before is in the style of Memorandum addressed to her by Agency Education Officer, Mohmand Agency at Ghalanai. It is stated in the said Memo. that consequent upon her absence from duty, she i.e. the appellant was asked to explain her absence but no reply was received in the office and again she was given show cause notice to show the reasons of absence but in vain. Therefore, she was informed that she by the said Memo. was removed from service with immediate effect. On the other hand, respondent No. 3 in his separate comments, submitted that the appellant was transferred to Mohmand Agency from Bajaur Agency and there at Mohmand Agency, she served till April, 2014. She was deputed from Mohmand Agency to F.R Kohat at the direction of Director of Education FATA on 24.04.2014 and the deputation order was issued for duty vide order dated 05.05.2014 at GGMS Feroz Mela, FR Kohat. It is also an admitted position on behalf of respondent No. 3 that she performed her duty in FR Kohat till October, 2014 and there-after she was relieved with direction to join her service in the previous station i.e. Mari Kor at Mohmand Agency. If version of the respondent No. 3 is kept in view, proceedings as to absence as reflected in the Memo. dated 18.10.2013 addressed to the appellant about her removal becomes questionable, when she was on duty till October, 2014 as per version of respondent No. 3. Obviously, the available parawise comments of respondents No. 1 and 2 with the copies of supporting record are short to provide the material for determination of the question of conflict between versions of respondents No. 1 & 2 and that of the respondent No. 3. There is yet another aspect of case in hand. The impugned order dated 18.10.2013 suggests that departmental proceedings

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against the appellant were taken ex-parte due to her non-participation. The relevant Rule 3 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 provides that in case of non-availability/absence of a civil servant, he/she has to be served with notice through registered post at her residential address and, in case of failure of appearance, the notice is required to be published in two leading Newspapers. But no such notice was published before the impugned order. In the circumstances, the appellant remained at loss in defending her cause in accordance with law.

5. For what has been discussed above, the appeal in hand is allowed, the impugned order dated 18.10.2013 is set aside and the appellant is reinstated into service. The respondents shall be at liberty to hold regular/proper enquiry against the appellant and pass order afresh strictly in accordance with law. De-novo exercise shall be completed by the respondents within a period of ninety days from the receipt of copy of instant judgment, also allowing the appellant to participate therein and bring forth her defense. She shall be allowed to cross examine witnesses appearing against her, if any. The issue of back benefits in favour of the appellant shall be subject to the outcome of de-novo proceedings. Parties are, however, left to bear their respective costs. File be consigned to the record room.

*[Signature]*  
 (ROZINA REHMAN)  
 Member(J)

*[Signature]*  
 (AHMAD SULTAN TAREEN)  
 Chairman

ANNOUNCED  
 22.09.2021

*[Handwritten signature]*

*[Handwritten signature]*  
 24.6.21

9/11/2021  
 26 - 2400  
 4 -  
 30 -  
 9/11/2021  
 9/11/2021



18

(7)

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

Phone No:-091-9210389, 9210938, 9210437-9210957-9210468 Fax:-091-9210936

No: - 3574

Dated Peshawar: - 30/03/2022

To

The District Education Officer (Female),  
District Mohmand.

Subject:- **SUBMISSION OF DOCUMENTS IN CONNECTION WITH THE  
INQUIRY NOTIFICATION ENDST: NO. 16937-39, DATED: 27/02/2021**

Memo:-

With reference to the Inquiry Notification as cited above, the undersigned requires the following documents, in respect of Miss. Nabeela Afridi, Ex-PST, GGPS Marikor Pandjali, District Mohmand, as to proceed further into the matter, which may be submitted within 3 days positively please:

1. First Appointment Order
2. Transfer Order from GGPS Tarkhor, Bajour to GFCS Spenki, Tangi, Mohmand
3. Transfer Order from District Mohmand to FR-Kohat
4. AEO FR-Kohat's Relieving Order from FR-Kohat to GGPS Marikor Pandjali, District Mohmand
5. Show Cause Notices issued to her
6. Charge Sheet issued to her
7. Termination Order

(WAJEEH UDDIN AHMAD)  
DEPUTY DIRECTOR (Estab:)  
DIRECTORATE OF E&SE KP PESHAWAR

Endst: No. \_\_\_\_\_

/Dated: \_\_\_\_\_

Copy forwarded for information:

1. Deputy Director (M&E) of Local Directorate
2. PA to Director E&SE KP Peshawar
3. Office Record

(WAJEEH UDDIN AHMAD)  
DEPUTY DIRECTOR (Estab:)  
DIRECTORATE OF E&SE KP PESHAWAR

*Mohmand*  
*24.5.21*

19



**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
MOHMAND TRIBAL DISTRICT**

No 1530 Dated 26/04/2022



To

The Director  
Elementary & Secondary Education  
Khyber Pkhtunkhwa Peshawar

Subject: **PROVIDIG RECORD IN R/O NABEELA AFRIDI PST**  
Memo:

Reference your verbally direction on the subject cited above for providing record in r/o Nabeela Afridi PST. The case of the said teacher is related to District Education Officer (M) District Mohmand and the record is not available at this office because the undersigned has started working since September, 2021 and the above named PST was appointed many years ago by DEO (M). The concerned office has been contacted by the undersigned to provide the said data but no reply received from that office.

Therefore it is requested to submit the case to DEO (M) Mohmand for providing record at your own level please.

District Education Officer (F)  
Mohmand Tribal District

Waheed/\*\*\*

*Handwritten notes:*  
24/6/24

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AB

03160954378

OFFICE OF THE EDUCATION OFFICER, BAJAUR AGENCY AT KHAR

APPOINTMENT ORDER

Miss Nabeela Afridi D/O Karim Khan Afridi is hereby appointed against vacant PTC Post in BPS.7 O Rs.1095/- with usual allowance as admissible under the Govt. Girls Primary School Chagal Bajaur Agency from the date of her taking over charge on the interest of public service.

TERMS/CONDITION

1. Charge report should be submitted in duplicate to this office.
2. Her appointment purely made on temporary basis & liable to termination without any notice any time.
3. She should produce her Health & Age certificate from the Agency surgeon.
4. She should produce her original Certificate before taking over charge.

87  
(Al Haj Sayed Razi Shah Kazmi)  
Agency Edu, Officer,  
Bajaur Agency.

Endst No. 4028-38 / (F) dated 20 / 10 / 1993.

Copy for information to the:

1. Director of Education FATA, NWFP, Peshawar with reference to his memo No. Nil dated 10/10/1993.
2. AAEO/(Female) Concerned
3. Candidate Concerned.
4. Ace euntant of the local office.

*S. M. Rizvi*  
Agency Education Officer,  
Bajaur Agency at Khar  
20/10/1993

*M. H. Khan*  
24-8-24

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803

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[Stamp]

DIRECTORATE OF EDUCATION (FATA) N.W.F.P PESHAWAR.

TRANSFER.

Mst: Nabila Afridi PTC Govt: Girls Primary School Tarkho (Bajour Agency) is hereby transferred to GJCS Spinki Tangi (Mohmand Agency) against a vacant post of PTC on her own pay & grade w.e.f the date of her taking over charge.

NOTES:-

1. Charge reports should be submitted to all concerned.
2. No TA/DA etc: is allowed.

(FAZLI MAHAN)  
Director of Education  
(FATA) N.W.F.P Peshawar.

Endst: No 17858-62 /VAL/Mohmand/Vol-II/Dated 6/08/2007

Copy forwarded for information to the:-

1. Agency Education Officer Bajour Agency at Khar.
2. Agency Education Officer, Mohmand Agency at Ghelbanai w/r to his letter Nos: 3195 dated 2.9.07.
3. Agency Accounts Officer (Bajour Agy:) at Khar.
4. Agency Accounts Officer (Mohmand Agy:) Ghelbanai.
5. Teacher concerned.

*[Signature]*  
Dy: Director of Education  
(FATA) N.W.F.P Peshawar.

*[Signature]*  
6/8

*[Signature]*  
Irshad *[Signature]* 7/8/07

*[Signature]*  
24.6.24



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### چارج ریویژن

میں نے محکمہ ایجوکیشن افسر، منیجر ایچ ایف جی میں بحث کی

طے سے ایچ اور کچنل ریویژن - جی - ایف ایچ - ایچ ایچ ایچ

GFLS

میں بخورجھ ۹/۸/۰۰۶ میں قتل اور دو مہینے کے چارج

سینئر لیا =

دکھو چارج کر رہا

رینالیا فریدی

*Alena Firdi*

P.T.C

دستخط چارج دھندہ

*D. D. D.*

Handwritten signature and date at the bottom right.



23  
OFFICE OF THE AGENCY EDUCATION  
AT GHALLANAI MOMAND AGENCY  
Phone.0924290180 Fax.0924290180  
No. \_\_\_\_\_  
Dated Ghallanai the \_\_\_\_\_ / \_\_\_\_\_ /2013

To,

Mst; Nabila Afridi PST.  
GGPS, Marai kor Tehsil Pandaily M/Agency.

Subject; REMOVAL FROM SERVICE.

Memo.

Consquent upon your absence from duties you were asked vide this office No. 18486-92 dated, 20/09/2013, to explain about your absence, but no reply was received form this office, then you were asked vide this office No. 18570-75 dated, 02/10/2013, to show the reasons of absence and no response towards the explanations served upon you, but in vein.

Therefore, you are hereby removed from service in the best interest of public service with immediate effect.

Agency Education Officer,  
Mohmand Agency at Ghallanai.

Endst; 18721-26 / Dated Ghallanai the 18 / 10 /2013.

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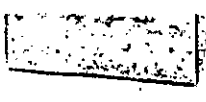
1. Director of Education FATA, KPK, Peshawar.
2. Political Agent Mohmand Agency.
3. Asstt; Political Agent Upper/Lower Mohmand.
4. AAO, Mohmand Ghallanai.
5. AAEO, Concerned.

Agency Education Officer,  
Mohmand Agency at Ghallanai.

*[Handwritten signature]*

*[Handwritten signature]*  
24.11





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عنور رضا۔ ڈائریکٹر آف محمد تمیم خان کا KPK لیٹاور

حنا۔ عالی۔ درخواست عبادتبادلہ۔

انگزارش کفورا الزریہ کہ سائیکل 25<sup>10</sup>/<sub>1993</sub> سے تاحال کثیت آئی  
گورنمنٹ گنرز ہیرا ہیری سکول جاری کور کھیل ہیرا ہیری میں ڈیوٹی  
انجام دے رہا ہے۔

سائیکل FR کو عٹ کے رہیں والی ہے۔ سائیکل نے اپنی سلاخ سے  
دور کثیت سے مشکلات کا سامنا کیا۔ اور ہر دست بھی ہے۔ اب چونکہ  
گنرز ہیرا ہیری کثیت سے زیادہ سوجھی ہے۔ اور کچھ کی ہرورش و بھیج  
تربیت دینے کے لئے اپنے گاؤں جانا ہرورش سوجھی ہے،  
ہیرا آ رہا ہے ہیرا ہیری کثیت سے سائیکل کے مشکلات کو مد نظر رکھ کر  
ہیرا ہیری سے FR کو عٹ کو تبادلہ کا حکم ہرورش فرمائیں  
نورزش ہیری

العارض :- جناب عالی کا نام بہ فرمائیں سبیلہ آفریدی آئی ڈی گورنمنٹ ہیرا ہیری سکول  
جاری کور ہیرا ہیری کھیل ہیرا ہیری

ATTESTED

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NO objection  
on her transfer  
to FR school

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17/9/13

A. E. O.  
Mohmand Agency.

ATTESTED

Handwritten signature

24.6.24

حضرت صاحب دائرہ تعلیم کالج - P.K.C. لہذا  
درخواست بجا رہے گا

22

تعداد میں سے کہ سائیکل 25<sup>10</sup> 1993 سے تاحال کھینچ کر  
گورنمنٹ گریڈ پرائمری سکول ماری کور کھلی  
پتہ پالی ویکٹا کیس سے گورنمنٹ کے احکام سے  
سائیکل F.R کو مٹا دیا گیا ہے۔ سائیکل سے اپنی علاقہ میں  
چور بیت سے مشکلات کا سامنا کیا۔ اور پرائمری سکول سے  
اب چونکہ گورنمنٹ کے احکامات ہیں زیادہ سے زیادہ  
موریشن اور اس طرح تربیت دینے کے لئے  
دیوڑھی سے لگدڑ آپ صاحبان ماری کور کھلی سے  
مد نظر کور کھلی میں رہیں گے۔  
حکم صادر فرمایا ہے۔  
الغرض صاحب عالی کا نام فرغانہ میں  
گورنمنٹ پرائمری سکول ماری کور پتہ پالی  
کے لئے ہے۔

PST NABILA

As I have already stated on here for Kohat  
previous application we don't have vacant post either for Kohat  
However she is deputy from Mochmand Agency  
to FR Kohat. we will adjust her in FR Kohat if  
'E' when any vacant post arises she will be  
admitted accordingly.

ATTESTED

ATTESTED

18-4-2014  
Asst. Edu. Officer (PST)  
FR Kohat

حضرت صاحب دائرہ تکلیف و تفویض تعلیم ماہانہ 10 PK لکھنؤ  
درخواست نمبر 10/2014

23

تدارک کے لئے سائیکل 25<sup>10</sup> سے تاحال بحالت  
گورنمنٹ گریڈ پرائمری سکول ماری کورجھلی  
پتہ پالی بھنگا ایجنسی سے گورنمنٹ کے  
سائیکل F R کوٹھالی سے ایسی والی سے سائیکل کے  
حوالہ سے مشکلات کا سامنا کیا۔ اور اس وقت تک  
ان چوتھ گویلو مشکلات بہت زیادہ ہو چکی ہیں۔ اور  
سپرورٹس اور سرپرست کے لئے ایک ٹاؤن جانا  
درجہ میں ہے۔ لہذا آپ صاحبان سرکاری اسکول  
مد نظر کو ایجنسی سے سائیکل کے مشکلات  
حکم صادر فرمائیں۔

NABILA  
PST

Humandip Singh  
As I have already  
previous application we don't have  
However, she is deputy  
to FR when we will adjust her  
& adjusted accordingly

started on vacant post  
from Mohamad Agency  
in FR Kohat at  
she will be  
15/4/2014  
18.4.2014  
Director Education  
Secretary, Peshawar

ATTACHED

24.6.24

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OFFICE OF THE AGENCY EDUCATION OFFICER FR KOHAT AT KDA KOHAT.

No. 833-35

Dated: 5/5/2014.

OFFICE ORDER.

As directed by the Director of Education FATA, Warsak Road Peshawar  
Mst: Nabila Afridi PST at GGPS Mari Kor Tehsil Pandiali Mohmand Agency is here by adjusted  
in GGMS Feroz Mela FR Kohat on temporary basis with immediate effect till further order.

NOTE: - She will draw her salary from here original school.

*[Handwritten Signature]*  
6/5/2014

Agency Education Officer  
FR Kohat.

Endst No. \_\_\_\_\_ /

Dated: \_\_\_\_ / \_\_\_\_ / 2014.

Copy to the:-

- 1. Director of Education FATA, warsak Road Peshawar.
- 2. Agency Education Officer Mohmand Agency.
- 3. Assistant Agency Education Officer (Fe-Male) FR Kohat.

Agency Education Officer  
FR Kohat.

ATTESTED

*[Handwritten Signature]*

ATTESTED

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24.6.24

بسم اللہ الرحمن الرحیم

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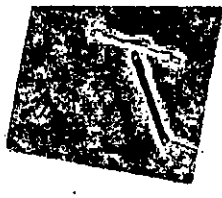
ماہنامہ	
833-35	P.T.C. School
	گورنمنٹ گرلز ہائی اسکول
	فیروز خانہ پور
	پٹوہ
	گورنمنٹ
	P.T.C. School
	Date 7/5/2014
	Head Mistress
	G.G.M School
	Ferozo Khan Mela
	Ahmad Khalil

ATTESTED

A

A

Ahmad Khalil  
24.6.2014



کوریٹور گورنمنٹ ہائی اسکول جسر حاضری مدرسین میونسپل کورپوریشن  
 بابت ماہ مئی

نام خانوادہ اختر نورین صوبہ راجستھان  
 پ.ت.و.ج

ردیف	P.S.T			P.T			P.T.C		
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 24.6.24

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گورنمنٹ گریڈنگ سکول رجسٹر حاضری مدرسین جنوری 2014

منانہ سہ				صباح				سیرہ				شب			
S.C.T				D.M				P.S.T				P.S.T			
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S.S	12:30	S.S	7:30					S.A	12:30	S.A	7:30	N.A	12:30	N.A	7:30
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شماره صفحات: خان سابقہ میزان حال سابقہ میزان حال سابقہ میزان حال سابقہ میزان

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گورنمنٹ گریجویٹ سکول راجستھان

گورنمنٹ گریجویٹ سکول راجستھان			
بابت ماہ		۲۰۱۱	
مذکورہ ذیل کے سرکاری ملازمین کے لئے			
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عہدہ C.T			
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2011 گورنمنٹ گریجویٹ سکول راجستھان

گورنمنٹ گریجویٹ سکول راجستھان			
بابت ماہ اکتوبر		۲۰۱۱	
مذکورہ ذیل کے سرکاری ملازمین کے لئے			
روز	تاریخ	آدمی	گھنٹہ
عہدہ P.S.T			
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گورنمنٹ گریجویٹ سکول راجستھان

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کارخانہ

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میں نیدرلینڈز P.T.C. کے ساتھ ساتھ نیدرلینڈز کی حکومت  
کا نام اور جس کے نام سے یہ کارخانہ چل رہا ہے

دو کاپیاں تیار کر کے اس کے ساتھ ساتھ  
اس کے ساتھ ساتھ اس کے ساتھ ساتھ

نیدرلینڈز 26/5/2014

دیکھو اس کے ساتھ ساتھ

P.T.C. کے ساتھ ساتھ

Abdul Shadi

P.T.C

Attested  
Ed

ATTESTED

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جناب ڈائریکٹر ایجوکیشن، فائنل سیکرٹریٹ

I-27 درخواست ہرائے منظوری چارج رپورٹ

جناب عالی

عرض ہے کہ میں بطور پرائمری سکول ٹیچر گورنمنٹ  
 ٹریننگ پرائمری سکول مہنگور، پنڈیالی ہمنڈ ایجنسی میں اپنی  
 خدمات سرانجام دے رہی تھی۔ اس دوران میں ہمنڈ ایجنسی  
 سے ایف آر کوٹ تبادلی ہوئی۔ درخواست جمع کی جوتہ پو  
 سوکر مجھے گورنمنٹ ٹریننگ پرائمری سکول فیروز پیلہ ایف آر  
 کوٹھاٹ عارضی طور پر ٹرانسفر کیا گیا۔ لیکن وہاں کوئی عالمی  
 آسام نہ ہونے کی بناء پر ایس کر دیا گیا اور میں نے دوبارہ گورنمنٹ  
 ٹریننگ پرائمری سکول مہنگور ہمنڈ ایجنسی میں اپنا چارج  
 جمع کیا لیکن وہ منظور نہیں کیا گیا اور تاحال میں دفتروں کے  
 حکمران رہی ہوں

اس لیے اخصاصان سے عاجزانہ التماس ہے کہ متعلقہ ایجنسی  
 ایجوکیشن آفیسر کو حکم صادر فرمائے کہ سر ایف آر کوٹ متطور  
 کر کے مجھے ڈیوٹی کرنے کی اجازت دی جائے۔

Subash Shah

Attested

الم 06/2018

پیلہ آفیسر سے P.T.C

گورنمنٹ ٹریننگ پرائمری سکول مہنگور ہمنڈ ایجنسی

2018.06.06

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The Director, (E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 18.10.2013 COMMUNICATED TO THE APPELLANT DURING COURT PROCEEDINGS ON 04.03.2019 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE.

Respected Sir,

It is most humbly stated that I was initially appointed before your good self Department as PST in the year 1993. After appointment I was submitted my charge report and started performing duty quite efficiently and upto the entire satisfaction of my superiors. I have served the respondent Department for more than 20 years at far flung areas in FATA. During service I was submitted several applications for my transfer to my home station i.e. FR Kohat which was allowed and I was adjusted on temporary basis in GGMS Feroz Mela, FR Kohat vide order dated 05.05.2014 and in response to the said order I was submitted my arrival report and started performing my duty at the concerned station. After few days I was again relieved due to non availability of the vacant post from FR Kohat to Mohmand Agency and I was submitted my charge report in GGPS Mari Kor, Mohmand Agency but the same was refused. I was time and again visited the concerned quarter and requested for acceptance of my arrival at the concerned station but the concerned authority was not willing to accept my arrival report. Finally I was feeling aggrieved filed Departmental appeal before the Director Education FATA on 11.06.2018 followed by service appeal No.1172/2018 before the august Service Tribunal. During the pendency of the above mentioned service appeal the District Education Officer, District Mohmand submitted his reply alongwith other documents on 04.03.2019 from which It came into my knowledge that the concerned authority removed me from service on 18.10.2013. Respected Sir, I am feeling aggrieved from the impugned order dated 18.10.2013 communicated to me during proceedings before the august Service Tribunal on 04.03.2019 preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 18.10.2013 may very kindly be set aside and I may be re-instated into service with all back benefits.

Dated: 25.03.2019.

Your Obediently

*Nabeel Afridi*  
NABEEL AFRIDI

PST

GGPS Mari Kor, District Mohmand

*M. A. Afridi*  
*ndc*  
25/3/2019