

INDEX

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO _____

APPEAL NO	INSTITUTION	ORIGINAL INSTITUTION	DECISION	PAGES
631/2022		27.04.2022	23.05.24	125

Nasir Khan vs GOVT OF K.P

Sr.No.	No of Pages	Documents	Page No
Part-A			
1	01-04	Order/Judgment	04
2	05-12	Order Sheets	08
3	13-33	Memo of Appeal	21
4	34-35	Notices	02
5	36-123	Reply	88
6	124-124	Nakalatnama	01
7	125-125	Challan	01
8	-		
9	-		
10	-		
11	-		
12	-		
Part-B			
1	-		
2	-		
3	-		

Total Pages in Part-A	0 125
Total Pages in Part-B	0

Copy of 27/6/24

Muharrir Compilation

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11/7/24

Incharge Judicial Branch

No 1216-17

From

Dated 08-06-23

The Principal
Govt: High School
Aman Garh, Nowshera

To.

The District Education Officer,
(Male) Nowshera.

Subject: APPEAL AGAINST Notification No. Endst: No 9780-85/File No./A-1/CT-IT/Appeals KPK/Estab-1 dated 17/03/2023 PROMOTION OF CTIT(BPS12) MALE TO THE POST OF SSTIT(BPS16) ON REGULAR BASIS.

Enclosed please find herewith the original appeal against notification No. Endst: No 9780-85/File No./A-1/CT-IT/Appeals KPK/Estab-1 dated 17/03/2023 promotion of CT-IT (BPS-12) male to the post of SST-IT (BPS-16) on regular basis in respect of Mr. Riaz Muhammad SST-IT (BPS-16) of this school submitted for further necessary action please.


PRINCIPAL

GOVT: HIGH SCHOOL
AMAN GARH, NOWSHERA

PRINCIPAL
GHS Amangarh
Nowshera

Service Appeal No.631/2022 titled "Nasir Khan versus Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", and Service Appeal No.871/2022 titled "Nasir Iqbal versus Director Elementary & Secondary Education & others" decided on 23.05.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Muhammad Akbar Khan, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

BEFORE: **KALIM ARSHAD KHAN** ... **CHAIRMAN**
MUHAMMAD AKBAR KHAN ... **MEMBER(Executive)**

Service Appeal No.631/2022

Date of presentation of Appeal.....27.04.2022
Date of Hearing.....23.05.2024
Date of Decision.....23.05.2024

Nasir Khan (Sweeper) S/O Raza Khan R/O Wazir Bagh Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar(Appellant)

Versus

1. **Director** Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. **District Education Officer (Female)** Peshawar.....(**Respondents**)

Service Appeal No.871/2022

Date of presentation of Appeal.....01.06.2022
Date of Hearing.....23.05.2024
Date of Decision.....23.05.2024

Mr. Nasir Iqbal, Ex-Junior Clerk (BPS-11), GGHS Qasab Khana, Peshawar(Appellant)

Versus

1. **Director** Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. **District Education Officer (Female)** Peshawar.....(**Respondents**)

Present:

Mr. Umar Farooq Mohmand, Advocate.....For the appellants
Mr. Muhammad Jan, District AttorneyFor respondents

APPEALS UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 24.03.2022 ISSUED BY THE RESPONDENT NO.2 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE WAS IMPOSED ON THE APPELLANTS AND AGAINST THE APPELLATE ORDERS DATED 17.05.2022 WHEREBY DEPARTMENTAL APPEALS OF THE APPELLANTS HAVE BEEN REGRETTEED ON NO GOOD GROUNDS.



SCANNED
Khyber
Peshawar

CONSOLIDATED JUDGMENT

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

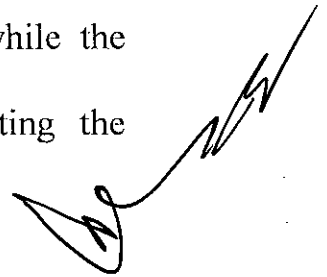
2. The appellants' cases in brief are that they were serving in the Education Department (Nasir Iqbal as Junior Clerk and Nasir Khan as Sweeper) in Government Girls High School Qasab Khana, Peshawar; that appellants were charge sheeted on the allegations of involvement of immoral activities, complained by the students; that inquiry was conducted and resultantly, vide impugned orders dated 24.03.2022 they were removed from service.

3. They filed departmental appeals, but the same were regretted. Therefore, they filed the instant service appeals.

4. 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.

5. We have heard learned counsel for the appellants and learned Deputy District Attorney for the respondents.

6. The learned counsel for the appellants reiterated the facts and grounds detailed in the memo and grounds of the appeals while the learned District Attorney controverted the same by supporting the impugned order(s).



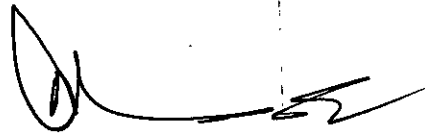
3

Service Appeal No.631/2022 titled "Nasir Khan versus Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", and Service Appeal No.871/2022 titled "Nasir Iqbal versus Director Elementary & Secondary Education & others" decided on 23.05.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Muhammad Akbar Khan, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

7. We have gone through the inquiry report on the basis of which the appellants were penalized. In the entire inquiry proceedings and in all the statements of the persons produced before and examined by the inquiry committee, none of the person has leveled any allegation against these two appellants. So much so, nobody has even named either of the two, rather the entire allegations appear to be against one Arshad Maria, Naib Qasid who had been penalized and also convicted, as told by the parties. In the absence of any material against the appellants, imposition of major penalty upon them is not justified.

8. Keeping in view the above situation, instant service appeals are accepted. Impugned orders are set aside and the appellants are reinstated into service with all back benefits. Costs shall follow the event. Copy of this judgment be placed in the file of the connected service appeal. Consign.

9. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 23rd day of May, 2024.*



KALIM ARSHAD KHAN
Chairman



MUHAMMAD AKBAR KHAN
Member (Executive)


Mutazem Shah


SCANNED
KPST
Peshawar

25.04.2024 1. Appellant alongwith junior to counsel present. Mr. Muhammad Jan, District Attorney Beenish Ashraf, Litigation Officer for the respondents present.

2. Former requested for adjournment on the ground that learned counsel for the appellant in disposed today. Adjourned. To come up for arguments on 23.05.2024 before D.B. P.P given to parties.

SCANNED
PESHAWAR


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

Kaleemullah

S.A No.631/2022


ORDER

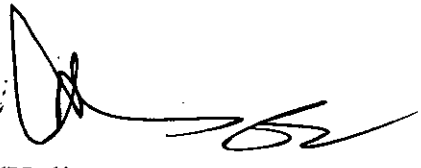
23rd May, 2024 1. Learned counsel for the appellant and Mr. Muhammad Jan, District Attorney for the respondents present.

2. Vide our consolidated judgment of today placed on file, instant service appeal is accepted. Impugned orders are set aside and the appellant is reinstated into service with all back benefits. Costs shall follow the event. Copy of the judgment be placed in file of the connected service appeal. Consign.

3. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 23rd day of May, 2024.*

SCANNED
PESHAWAR


(Muhammad Akbar Khan)
Member (E)


(Kalim Arshad Khan)
Chairman


Mutazem Shah


18.01.2024

Appellant in person present. Mr. Muhammad Jan,
District Attorney for the respondents present.

Appellant requested for adjournment on the ground that
his counsel is unable to attend the Tribunal due to strike of
lawyers. Adjourned. To come up for arguments on
18.03.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar



(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)

Naeem Amin

18.03.2024 1. Appellant alongwith junior counsel present. Mr. Asif
Masood Ali Shah learned Deputy District Attorney for the
respondents present.

2. Junior to counsel for the appellant requested for adjournment
on the ground that senior counsel for the appellant is busy before
Worthy Peshawar High Court, Peshawar. Adjourned. To come up
for arguments on ~~25.04~~ 25.04.2024 before the D.B. P.P given to the
parties.


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

Kaleemullah

01.12.2023

1. Junior to counsel for the appellant present. Mr. Muhammad Jan, learned District Attorney for the respondents present.

2. Junior to counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 20.12.2023 before D.B. P.P given to the parties.

RECEIVED
PESHAWAR
DISTRICT ATTORNEY

kamranullah

(Muhammad Akbar Khan)
Member (E)

(Rashida Bano)
Member (J)

20.12.2023

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Arshad Ali, ADEO for the respondents present.

2. Learned Deputy District Attorney requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 18.01.2024 before D.B. P.P given to the parties.

SCANNED
K.D.B.T
PESHAWAR

KaleemUllah

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

16.10.2023

1. Appellant in person present. Mr. Muhammad Jan learned District Attorney for the respondents present.

2. Lawyers are on general strike, therefore case is adjourned. To come up for arguments on 17.11.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar

(FAREEHA PAUL)
Member (E)

(RASHIDA BANO)
Member (J)

Kaleem Ullah

17.11.2023

Appellant alongwith his counsel present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 01.12.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

(Fareeha Paul)
Member (E)

(Salah-ud-Din)
Member (J)

Naeem Amin


(3)


19th July, 2023

1. Appellant alongwith his counsel present. Mr. Fazal Shah Mohmand, learned Assistant Advocate General alongwith Safia Ameen, DEO (F) for the respondents present.

2. Representative of the respondent submitted complete inquiry file which is placed on file. A copy of the same is handed over to the learned counsel for the appellant, who requested for time to go through the same. Adjourned. To come up for arguments on 22.09.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)

*KaleemUllah

22.09.2023

Appellant alongwith his counsel present. Mr. Arshed Ali, ADEO alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 16.10.2023 before the D.B. Parcha Peshi given to the parties.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)


Naeem Amin


SCANNED
KPST
Peshawar

3rd Feb, 2023

Clerk of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Lawyers are on strike, therefore, case is adjourned. To come up for arguments on 08.05.2023 before D.B. Office is directed to notify the next date on the notice board as well as on the website of the Tribunal.


(Muhammad Akbar Khan)
Member (E)



(Kalim Arshad Khan)
Chairman


08.05.2023

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

Complete inquiry record of the appellant is not available on file, therefore, respondents are directed to positively produce the same on the next date and to come up for arguments on 19.07.2023 before the D.B. Parcha Peshi is given to the parties.

SCANNED
KPS
Roshan


(Muhammad Akbar Khan)
Member (E)


(Salah-ud-Din)
Member (J)

Nacem Amin

21.11.2022

Appellant present in person. Kabir Ullah Khattak learned
Additional Advocate General for respondents present.

Written reply on behalf of respondents not submitted.
Learned AAG sought further time for submission of written
reply. Adjourned. To come up for written reply on 20.12.2022
before S.B.

SCANNED
KPST
Peshawar




(Rozina Rehman)
Member (J)

20th Dec. 2022

Counsel for the appellant present. Mr. Naseerud Din
Shah, Assistant Advocate General alongwith Arshad Ali,
ADEO for the respondents present.

Reply/comments on behalf of the respondents
submitted which is placed on file and a copy whereof
handed to learned counsel for the appellant. To come up
for rejoinder/arguments on 03.02.2023 before the D.B.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member(E)

18.07.2022

Mr. Shoukat Ali Yousafzai, Advocate for the appellant present.

Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 19.10.2022.

SCANNED
K-01
Peshawar

(Mian Muhammad)
Member (E)

19.10.2022

Appellant in person present.

On the previous date, appellant was directed to deposit security and process fee for notice too respondents. But the same is still awaited. Appellant is directed to deposit the same by today, whereafter, notices be issued to all the respondents for submission of comments for 21.11.2022 before S.B.

Rs-100/-
Appellant Deposited
Security & Process Fee

A. J. 31/10/22

(Rozina Rehman)
Member (J)

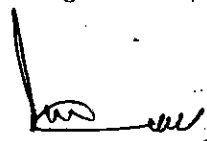


12

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 631/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/04/2022	<p>The appeal of Mr. Nasir Khan presented today by Mr. Shaukat Ali Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	13/5/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>13/5/22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	13.05 2022	<p>Learned counsel for the appellant present and requested for adjournment in order to further prepare the brief. Adjourned. To come up for preliminary hearing before the S.B on 18.07.2022.</p> <p> (Kalim Arshad Khan) Chairman.</p>

~~CONFIDENTIAL~~

~~CONFIDENTIAL - SECURITY INFORMATION~~

~~Requested information regarding the activities of the
CIA's Adjoint to the Chief of the Operations Section
in the S. O. P. 2022.~~

~~CONFIDENTIAL - SECURITY INFORMATION~~
~~CONFIDENTIAL~~

1/2/72

20

D

1/2/72

1/2/72

D

(13)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: _____

S#	CONTENTS	YES	NO
1	This Appeal has been presented by <u>Shaukat Ali Adv.</u>		
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent oath commissioner?	✓	
8	Whether Appeal / Annexures are properly paged?	✓	
9	Whether Certificate regarding filing any earlier appeal on the subject, furnished?		
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/ clear?	✓	
13	Whether copy of appeal is delivered to AG/ DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?	✓	
15	Whether number of referred cases given are correct?	✓	
16	Whether appeal contains cutting / overwriting?		✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this Court?	✓	
19	Whether requisite number of spare copies are attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether security and process fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, Notice along with copy of Appeal and annexures has been sent to Respondents? On _____	✓	
26	Whether copies of comments / reply / rejoinder submitted? On _____		
27	Whether copies of comments/ reply/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- Shaukat Ali Adv.

Signature:- [Signature]

Dated:- 22.4.2022

14

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A 631 /2022

Nasir Khan

**SCANNED
KPST
Peshawar**

VERSUS

Government of Khyber Pakhtunkhwa and Others

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-7
2.	Affidavit.		8
3.	Addresses of Parties.		9
4.	Copy of FIR	"A"	10
5.	Copy of suspension order	"B"	11
6.	Copies of charge sheet and statement of allegation	"C & D"	12-13
7.	Copy of response to the charge sheet application	"E"	14
8.	Copy of impugned Office Notification dated 24-03-2022	"F"	15
9.	Copies of Departmental Appeal and impugned Office Order Dated 06-04-2022	"G & H"	16-17
10.	Other Document		18-19
11.	Wakalatnama		20

Dated: 21/04/2022

Appellant

Through
Shaukat Ali Yousafzai
Advocate Peshawar High
Court

[Signature]
22-4-2022

(15)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In S.A. 631 /2022

Nasir Khan (Sweeper) S/o Raza Khan R/o Wazir Bagh
Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar

-----Appellant

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 627 Mammul

Dated 27/4/2022

VERSUS

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. District Education Officer, (Female) Peshawar

-----Respondents

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
-1974 AGAINST THE IMPUGNED REMOVAL
ORDER No. 4454-60 DATED 24-03-2022
ISSUED BY THE OFFICE OF THE DISTRICT
EDUCATION OFFICER (FEMALE)
PESHAWAR, WHEREBY THE APPELLANT
WAS REMOVAL FROM SERVICE AND HIS
DEPARTMENTAL APPEAL WAS TURNED
DOWN VIDE ORDER No. 6307/F.NO./A-20/C-
IV/NASIR KHAN SWEEPER DATED 06-04-
2022 IN A CLASSICALLY CURSORY AND
WHIMSICAL MANNER.**

Filed to-day

Registrar

27/4/2022

Respectfully Sheweth,

1. That the Appellant is a bona-fide citizen of Islamic Republic of Pakistan and hails from a respectable family.

2. That after going through the mandatorily required criteria, the Appellant got onto the rolls of the Respondent Department years back.
3. That since induction into service and after getting onto the rolls of this extremely humane and prestigious Department, the Appellant has remained the most pragmatic, devoted and dutiful fellow, who never left any stone unturned in performance of his duties and importing any responsibility that has been entrusted to the Appellant.
4. That it was in the backdrop of November 2021 that a complaint/FIR was registered by Mst. Kalsoom Bibi w/o Ijaz Hussain bearing FIR No. 1604 dated 12-11-2021 U/S 377-B PPC and 53 CPA at Police Station Agha Meer Jani Shah Peshawar against one Mr. Mian Arshad s/o Mian Khadim Shah for involvement in sexual abuse / immoral activities at Government Girls High School Qassab Khana, Peshawar. **(Copy of FIR is annexed herewith as annexure "A")**
5. That thereafter the District Education Officer (female) Mr. Abdul Saeed Principal of Govt. Shaheed Syed Afaq Ahmed High School No. 3, Peshawar Cantt and Mst. Bibi Tasleem Principal of Govt. Girls High School, Quid abad, Peshawar were appointed as inquiry officers with strict instructions to conduct inquiry regarding the above-mentioned FIR. Incident, which was accordingly carried out.

6. That in consequence to the inquiry conducted by the inquiry officers the service of the Appellant was suspended from the rolls of Respondent Department vide Office Order No. 362-67 Dated 01-01-2022 on the alleged ground of his involvement in immoral activities at Government Girls High School Qassab Khana which is against the facts and circumstances as the name of the Appellant was not mentioned anywhere in the said FIR. **(Copy of suspension order is annexed herewith as annexure "B")**.
7. That there after the charge sheet and statement of allegation dated 01-01-2022 was issued to the Appellant without any reason along with immoral activities which is why he was charged in the FIR No. 1604 dated 12-11-2021 U/S 377-B PPC and 53 CPA at Police Station Agha Meer Jani Shah Peshawar. **(Copies of charge sheet and statement of allegation are annexed herewith as annexure "C" & "D")**.
8. That the appellant move several application to the response of charge sheet to the officers of inquiry Commission, conducted by the Office of District Education Officer (Female) Peshawar but no response from the inquiry officers and futile. **(Copy of response to the charge sheet application is annexed as annexure "E")**

9. That eventually the Appellant was removed from the rolls of the respondent department vide impugned Office Notification No. 4454-60/Special File/GGHS Qassab Khana dated 24-03-2022 without conducting proper inquiry against the Appellant, on a plea that complaints have been received against the Appellant from most of the school girls at Government Girls High School Qassab Khana, Peshawar which were fake, wrong and fabricated. **(Copy of impugned Office Notification dated 24-03-2022 is annexed herewith as annexure "F")**
10. That soon after receiving the charge sheet and statement of allegation, the Appellant preferred a Departmental Appeal Dated 28-03-2022 for his reinstatement into service but there was no light to the end of the tunnel and the Departmental Appeal of the Appellant was turned down vide Office Order No. 6307/ F.No./A-21/C/IV/ Nasir Khan Sweeper Dated 06-04-2022. **(Copies of Departmental Appeal and impugned Office Order Dated 06-04-2022 are annexed herewith as annexure "G" & "H")**
11. That no proper show cause or final show cause notice was ever issued to the Appellant, nor he was personally heard or given the opportunity to explain himself.
12. That feeling aggrieved from the supra-mentioned episode, the grievances, that come into existence,

having no other adequate remedy available elsewhere, and forum to be addressed at, the Appellant approaches this Hon'ble Tribunal for his re-instatement into service, upon the following grounds, inter-alia;

Grounds:

- A. That the impugned removal Notification is wrong, illegal, unlawful, void-ab-initio and is not sustainable at all.
- B. That all the impugned notification is unwarranted, illogical and against the Rules so therefore not tenable in the eyes of law.
- C. That no proper inquiry was ever conducted in case of the Appellant, nor the Appellant was ever heard in person, thus the appellant was condemned unheard which is illegal, unlawful, which is not justified in any canon of law.
- D. That the name of the Appellant was not mentioned in the above-mentioned FIR nor he was ever involved in immoral activities.
- E. That, there is no proof / written record of the complaints made by the school girls against the Appellant and plea taken by the Respondent

(20)

department is completely fake, fabricated and based on assumptions.

F. That even the departmental appeal of the appellant was turned down on, regardless of looking into the facts and was ~~removed~~ from the service.

G. That the appellant has served the respondent department for a couple of years and that too unblemished, without any complaint ever against, on part of the Appellant.

H. That from every angle the Appellant is liable to be re-instated into service with all back benefits.

I. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned Office Notification No. 4454-60/Special File GGHS Qassab Khana, Dated 24-03-2022 of the office of District Education Officer (Female), Peshawar, whereby the Appellant was removed from Service, and the Departmental Appeal of the Appellant was turned down vide the Impugned Office Order No. 6307/F.No./A-20/C-IV/Nasir Khan Sweeper Dated, 06-04-2022 of the Office of Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

(2)

(7)

may very graciously be set-aside and by doing so the Appellant may very graciously be re-instated into Service with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated: 20-04-2022

NAS

Appellant

Through
Shaukat Ali Yousafzai
Advocate Peshawar High
Court

22.4.2022

NOTE:-

No such, like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

[Signature]

Advocate

22

(8)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2022

Nasir Khan

VERSUS

Government of Khyber Pakhtunkhwa and Others

AFFIDAVIT

I, Nasir Khan (Sweeper) S/o Raza Khan R/o Wazir Bagh Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar, Peshawar do hereby solemnly affirm and declare that all the contents of the accompanied appeals true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.



DEPONENT *NKS*

CNIC# 17301-9696280-3

9

23

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2022

Nasir Khan

VERSUS

Government of Khyber Pakhtunkhwa and Others

ADDRESSES OF PARTIES

APPELLANT.

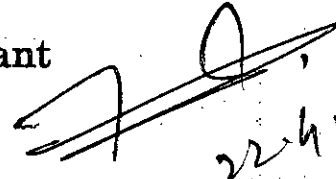
Nasir Khan (Sweeper) S/o Raza Khan R/o Wazir Bagh
Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar

RESPONDENTS:

1. Director Elementary & Secondary Education, Khyber
Pakhtunkhwa, Peshawar
2. District Education Officer, (Female) Peshawar

Dated: 21/04/2022


Appellant

Through 
Shaukat Ali Yousafzai
Advocate Peshawar High
Court

22.4.2022

(14)

(25)

(64)



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email: E.D. emis/peshawar@gmail.com

SUSPENSION:

Consequent upon the report of Inquiry Officer vide letter No. 1902 Dated. 29.11.2021 regarding FIR lodged against Mr. Mian Arshad Khan S/O Mian Khadim Shah Naib Qasid of Govt. Girls High School Qasab Khana Peshawar under section PPC-377-B- 53 CPA dated. 12.11.2021.

(Mr. Nasir- Sweeper of Govt. Girls High School Qasab Khana Peshawar is hereby suspended due to Involment in illegal/immoral activities from service w.e. from the date of FIR till further orders.

Note:-

1. Necessary entry should be made in his service book.
2. Allowed suspension allowance if not absconder.
3. Services of the above is hereby place at the disposal of this office

(SAMINA GHANI)
District Education Officer
(Female) Peshawar

Endst No. 369-67 / FIR-Mian Arshad Khan / Dated. 09/11/2022

Copy forwarded to the:-

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- P.S to Sectary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3- P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 4- Inquiry Officers
- 5- Headmistress, Govt. Girls High School Qasab Khana Peshawar with the direction to direct the official concerned to report to this office.
- 6- Master File.
- 7- ADO

Dy: District Education Officer
(Female) Peshawar

C-IV Transfer Case

General Letter Folder/ Suspension for (Estab. No. 1448) 09/3/22

1376
1372
Khyber Pakhtunkhwa

د. ا. ا. ا.
D.O.F

DP
09/3/2022

ATETC 20

B-17



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com

CHARGE SHEET.

1. Samina Ghani DEO (F) Peshawar as competent authority hereby charge you Mr. Nasir, Sweeper of GGHS Qasab Khana Peshawar as follow:

That you while posted as Sweeper, of GGHS Qasab Khana Peshawar, committed the following irregularities: -

- 1- You are involved in the illegal activities.
- 2- In the light of students written statements, you have characterless attitude and involve in immoral activities in the premises of school.
2. By Reason of the above, you appear inefficient & guilty of misconduct under rule 3 of the Khyber Pakhtunkhwa Government servant (Efficiency and Discipline) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in Rule 4 of the rules ibid.
3. You are therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer / inquiry committee, as the case may be.
4. Your written defense, if any, should reach the inquiry officer / inquiry committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.

Samina Ghani
01/01/2022
District Education Officer
(Female) Peshawar

ATTESTED



13 27 61
Annexure - 17
OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com

DISCIPLINARY ACTION.

1. Samina Ghani DEO (F) Peshawar as competent authority, am of the opinion that Mr. Nasir, Sweeper GGHS Qasab Khana Peshawar, has rendered himself liable to be proceeded against, as he committed the following act/omission, within the meaning of rule-3 of the Khyber Pakhtunkhwa Government servant (Efficiency & Discipline) Rules, 2011:-

STATEMENT OF ALLEGATION.

- 1- You are involved in the illegal activities.
- 2- In the light of students written statements, you have characterless attitude and involve in immoral activities in the premises of school.

2. For the purpose of inquiry against the said accused with reference to the above allegations, an formal inquiry officer / inquiry committee, consisting of the following, is constituted under rule 10(1)(a) of the ibid rules.

I. Mst. Farzana Lal Sher, Principal, GGHS Gorkhani Peshawar.

II. Mr. Ehteram Khan, Principal, GHSS Urmar Bala, Peshawar

3. The Inquiry Officer / inquiry committee shall, in accordance with the provision of the ibid rules, provide reasonable opportunity of hearing to the accused, record its finding and make, within thirty days of the receipt of this order, recommendations as to punishment or order appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer / inquiry committee.

Mr. Nasir, Sweeper
Office of the Headmistress,
GGHS Qasab Khana, Peshawar

B. Jinnah
01/01/2022
District Education Officer
(Female) Peshawar

ATTESTED

124

Case No - 2594
DEO (F)
10/1/2022

GB

The inquiry officers

1. Madam Farzana Lal Sher Principal GGHS Chamkani
2. Ihteram Khan Principal GHSS Urmar Bala Pesh

Annexure - 1

Subject:- Response to the Charge Sheet

Sir/ Madam,

With due respect, following are my responses to the charge sheet issued by DEO (F) Peshawar vide letter No -372 dated 1-1-2022 received by me on 05-1-2022.

1. I have never been involved in any illegal activities. Rather I performed my duties with hard work and diligence.
2. I have never been involved in any immoral activities in the premises of school and the students have not given any statement against me.
3. I am willing to be heard in person so that the misunderstanding should be removed.
4. The allegations levied against me are not true and are against the facts. So it is requested to complete the inquiry with fulfillment of standard of justice.

Copy for Information
DEO (F) Peshawar

Yours obediently

NAS
10/1/2022
Nasir Khan

Sweeper

Under suspension

GGHS Qasab Khana

Peshawar

ATTESTED



(15) 29

Annexure F

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email ID. emisfeshawar@gmail.com**

NOTIFICATION:

1. **WHEREAS** the Principal Govt. Girls High School Qasab Khana Peshawar has reported that Mr. Mian Arshad S/O Mian Khadim Shah Naib Qasid of GGHS Qasab Khana Peshawar has been arrested by the police on the report / FIR lodged by Mst. Hira Batool Student of class-7th vide No Nil dated 13.11.2021.
2. **AND WHEREAS** Mr. Abdul Saeed, Principal, Govt. Shaheed Syed Afaq Ahmad High School No.3 Peshawar Cantt and Mst. Bibi Tasleem Headmistress Govt. Girls High School Quaid Abad Peshawar were appointed as inquiry officers vide this office notification No. 859-63 dated. 13.01.2022 to inquire against the above named official who is involved immoral activities as per FIR and to submit detail report into the matter.
3. **AND WHEREAS** the enquiry Officers has submitted enquiry report vide No. 10021 dated 29.11.2021, received to this office diary No. 1690 dated. 02.12.2021. The enquiry officers have pointed out that Mr. Nasir Sweeper Govt. Girls High School Qasab Khana Peshawar attitude is characterless as per written complaint from most of the school girl's students of Govt. Girls High School Qasab Khana Peshawar and recommended for Removal from Service.
4. **AND WHEREAS** Another formal inquiry was conducted by Mst. Farzana Lal Sher Principal Govt. Girls Higher Secondary School Chmakani & Mr. Ehteram Khan Principal Govt. Higher Secondary School Umar Bala Peshawar with the direction to submit documentary proofs / clear cut recommendations vide this office Endst No. 30-34 dated. 28.12.2021.
5. **AND WHEREAS** He was proceeded against under Khyber Pakhtunkhwa Govt. Servant rules 2011 for the charge leveled by the inquiry officers in their inquiry report and was suspended vide this office Endst No 362-67 dated. 01.01.2022.
6. **AND WHEREAS** Charge Sheet was issued to the above named official through Headmistress vide this office Endst No. 372 dated. 01.01.2022.
7. **AND WHEREAS** Another Inquiry committee has submitted that Mr. Nasir, Sweeper Govt. Girls High School Qasab Khana Peshawar is not fit to be kept as sweeper after such reports about his characterless nature. He may be removed from service for having bad eyes on the girl's students in the school.
8. **AND WHEREAS** a reply in response of charge sheet received from the official concerned vide Diary No. 2594 Dated: 10.01.2022, which was found unsatisfactory.
9. **AND WHEREAS** The competent authority, District Education Officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charge of misconduct / Negligence in duty against the accused has been proved.
10. **NOW THEREFORE**, in exercise of the powers under Rules-4(b)iii of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline Rules 2011, I, Samina Ghani, District Education Officer (Female) Peshawar is pleased to impose major Penalty of "Removal from Service" upon Mr. Nasir Sweeper Govt. Girls High School Qasab Khana Peshawar with immediate effect.

(SAMINA GHANI)
District Education Officer,
(Female) Peshawar.

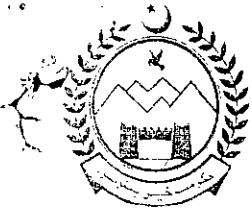
Endst: No. 4484-60 / Special File GGHS Qasab Khana / Dated: 24 / 03 / 2022

Copy of the above is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- Deputy Commissioner Peshawar.
- 3- Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 4- PS to Secretary, (E&SE) Khyber Pakhtunkhwa, Peshawar.
- 5- District Monitoring Officer (EMA) Peshawar.
- 6- Head Mistress GGHS Qasab Khana Peshawar with the remarks to recover any over payment made to the above named Official and deposit in to Govt. Treasury under intimation to this Office.
- 7- Official concerned.

District Education Officer,
(Female) Peshawar

ATTESTED



(17) (30)

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

No. 6307 /F.No. /A-20/C-IV/Nasir Khan Sweeper

Dated Peshawar the 06/04 /2022

Phone: 091-9225344

Email: ddadm.n.ese@gmail.com

To

The District Education Officer,
(Female) Peshawar.

Annexure = "H"

Subject: **APPEAL**

I am directed to refer to the subject cited above and to state that in Appeals r/o Nasir Khan Sweeper GGHS Qasab Khana Peshawar has been examined/analyzed by this office hence, inform the appellant concerned that have appeals has been rejected by the appellate authority.

Sd/-

Assistant Director (Admn)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Encls; No. 6307

Copy forwarded to the: -

1. Nasir Khan Sweeper GGHS Qasab Khana Peshawar
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

Sd/- 6/4/22

Assistant Director (Admn)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Sd/-

REGISTERED

It is stated that a appeal
received for reinstatement in P/O Nasir Khan
Khakroob CGHS Casab Khan, Peshawar. He
wants reinstatement in same Khakroob
Post.

If agreed the case may be sent to DEO Feroz
for comments/detailed report at an early date.
Submitted for your perusal and further work.

Ad Admn: P-1-2/N

B
28/3/22

may be sent to detail report/Comments of
Proposal & also Court decision if.

DD (A & D)

JF
28/3/22

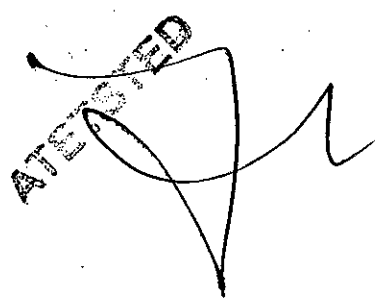
Para 2 of agree the DEO Command may
be asked to send report plus

Add: D/2 CPBS,

10
29-3-22

If agreed his appeal
may be rejected.

JF
31/3/22

ATTACHED


19

33

63



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emis@peshawar@gmail.com**

No. 372 / SPI GGHS Qasab Khana Dated Peshawar the: 01 /01/2022

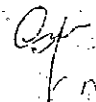
To

The Inch: Headmistress
G.G.H.S Qasab Khana
Peshawar

Subject: CHARGE SHEET

Memo:


I am to refer to the Subject noted above and to ask you to serve enclosed charge sheet upon Mr. Nasir Sweeper, GGHS Qasab Khana Peshawar and submit a copy of receipt thereof as a token to this office for record.

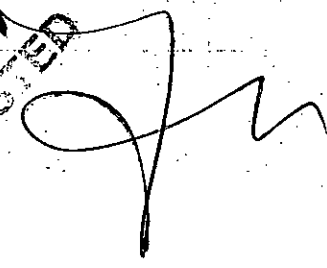

Dy: District Education Officer
(Female) Peshawar

Indst No. _____

Copy of the above is forwarded to the:-

1. P.S to Sectary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Inquiry Officer
4. Master file.


Dy: District Education Officer
(Female) Peshawar.


Dy: District Education Officer
(Female) Peshawar.

36

Before the Hon'ble Khyber Pakhtunkhwa service
tribunal Peshawar

Service appeal No. 631 / 2022

Nasir Khan (Sweeper)

SCANNED
KPST
Peshawar


VERSUS

Director of Elementary & Secondary and others

Index

S.No	Description Of Documents	Annex	Page
01.	PERA WISE COMMENTS		1 - 2
02.	AFFIDAVIT		3
03.	Copy of ATTENDCE SHEET	A	4
04.	Copy NOTIFICATION OF DISMISSAL of Head Mistress	B	5
05.	Copy of FIRST INQUIRY	C	6 - 12
06.	COPY OF 2 ND INQUIRY	D	13 - 18
07.	STATEMENT OF STUDENTS	E	19 - 26
08.	NOTIFICATION OF REMOVAL FROM SERVICE	F	27

Dated: 5/12/2022


District Education Officer
(Female) Peshawar

NASIR KHAN.....Appellant

VS

DIRECTOR ELEMENTARY & SECONDARY EDUCATION.....Respondents

PARA WISE COMMENTS ON BEHALF OF REPENDENTS NO 1 & 2

Respectfully Sheweth:

The respondent submits below:

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2392

Dated 20/12/22

Preliminary objections

1. That the appellant has got no cause of action / locus standi to file the instant appeal.
2. That the appellant has concealed material facts from this Hon'ble tribunal.
3. That the instant service appeal is based upon malicious/vexatious, frivolous grounds.
4. That the instant service appeal is badly barred by law limitation.
5. That the instant service appeal is not maintainable in its present form.
6. That the appellant has not come with clean hands to this Hon'ble tribunal.
7. That the instant appeal is bad for mis-joinder and non-joinder of the necessary parties.
8. That the appellant is estopped by his own conduct to file the instant appeal before this Hon'ble tribunal.

On Facts.

1. That para No. 1 pertains to appellant's personal record.
2. That reply to para No. 2 pertain record.
3. That in reply to Para No. 3 it is submitted that the inquiry committee has arisen question on his character and attitude while the rest of para pertains personal record.
4. That in reply to para No. 4 it is submitted that on 6 November 2021 the school closing time was 2.30 PM while the sad incident / occurrence was happened in the duty hours. According to attendance record provided by the concerned headmistress, the appellant was present at the last closing time. Therefore all class IV including Nisar (Sweeper) & clerk were suspected and properly inquired by both committees. While on the ground of negligence and concealing of facts the Headmistress of GGHS Qasab Khana has been dismissed on dated 18-11-2022, in the said case.

(COPY OF ATTENDANCE SHEET IS ATTACHED AS ANNEX A)

(COPY OF DISMISSAL NOTIFICATION IS ATTACHED AS ANNEX B)

5. That in reply to para No. 5, 6, 7 & 8. It is submitted that the sad incident was happened in school timing therefore all class VI including Mr. Nasir were inquired, in the light of the said incident two inquiries were conducted on the subject case vide Order No 1003 dated 29-11-2021 & vide order No 410 dated 17-02-2022 by the department. Their recommendation are as following.

As per first inquiry report recommendation that "According to the first inquiry recommendation "Mr. Nasir sweeper GGHS Qasab Khan's Peshawar may be removed from service as per written complaints from most is the girls student about his characterless attitude "According to second inquiry recommendation that "Mr. Nasir is not fit for government service because of his characterless

nature. He may be removed from service for having bed eyes on the girl's students in the school".

(38)

On the basis of aforesaid inquiries proper charge sheet and statement of allegation was issued to Mr. Nasir sweeper but reply of charge sheet was found unsatisfactory therefore according to E&D rules 2011 major penalty was imposed on Mr. Nasir and he was removed from service.

(COPY OF FIRST INQUIRY REPORT IS ATTACHED AS ANNEX C & COPY OF SECOND INQUIRY REPORT IS IN ANNEX D)

9. That para No. 9 is misleading and against the facts, it is pertinent to mention here, according to second inquiry committee report that the "statement of 11 students highlighting the character of Mr. Nasir sweeper when he is winking, stating, lecherous smiles and touching the students"

(STATEMENTS OF STUDENTS ARE ATTACHED AS ANNEX E)

10. That in reply to para No. 10 it is submitted that Mr. Nasir sweeper was actively involved in sexual harassment, immoral objectionable activities in school therefore he was removed from service and his department appeal was dismissed on the aforesaid grounds.

(COPY OF NOTIFICATION OF REMOVAL IS ATTACHED AS ANNEX F)

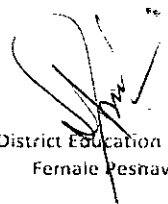
11. That para on 11 is misleading against the facts, all codal formalities charge sheets. Statement of allegations. Personal hearing and inquiries were dully adopted for his removal.


12. That the appellant has got no cause of action to file the instant appeal.

Grounds

- A. That ground A & B replied in facts para.
- C. That in reply to ground C has already given in facts para.
- D. That the ground D, E & F relied in the facts para.
- G. That reply to ground G & H are replied in the para of facts.
- I. That in reply to Ground I it is submitted that respondent also seek permission to advance other ground and proof in the time of arguments.

it is therefore, most humbly prayed that on acceptance of this para wise comments and the instant Service appeal in hand may very kindly dismissed, with cost.


District Education Officer
Female Peshawar


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUKHWA PESHAWAR.

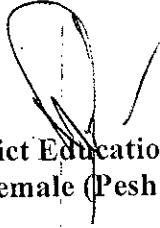
SERVICE APPEAL NO. 631/2022

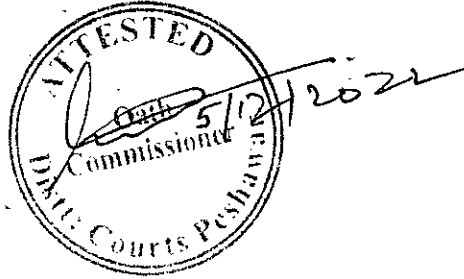
NASIR KHAN VS Director Elementary & Secondary Education

REPLY ON BEHALF OF RESPONDENT NO. 1 & 2

AFFIDAVIT

I solemnly affirm and declare on oath that the contents of the Para-wise comments reply on behalf of DEO (Female) Peshawar are correct to the best of my knowledge and nothing has been concealed from the Honorable Court.


District Education Officer,
Female (Peshawar)



90

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUKHWA PESHAWAR.

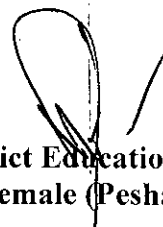
SERVICE APPEAL NO. 631/2022

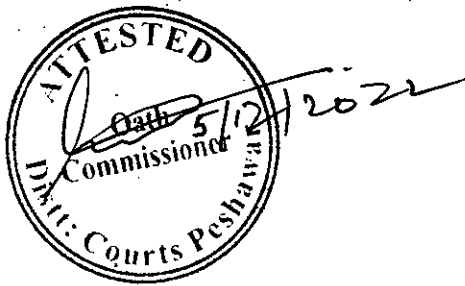
NASIR KHAN VS Director Elementary & Secondary Education

REPLY ON BEHALF OF RESPONDENT NO. 1 & 2

AFFIDAVIT

I solemnly affirm and declare on oath that the contents of the Para-wise comments reply on behalf of DEO (Female) Peshawar are correct to the best of my knowledge and nothing has been concealed from the Honorable Court.


District Education Officer,
Female (Peshawar)



رجسٹر حاضری برائے سٹاؤ

انٹرنیٹ سٹریٹاف

Annex A-4

بابت ماہ

نومبر 2021

زاہد اقبال			میراں ارشد خان			میراں محمد خان			میراں عبداللہ خان			سید خان		
TIC			N/A			Chowkidar			Sweepers			TIC		
آدم	روائی	دستخط	آدم	روائی	دستخط	آدم	روائی	دستخط	آدم	روائی	دستخط	آدم	روائی	دستخط
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3	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
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7	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
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9	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
10	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
11	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
12	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
13	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
14	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
15	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
16	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
17	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
18	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
19	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
20	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
21	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
22	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
23	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
24	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
25	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
26	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
27	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
28	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
29	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
30	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A
31	2:00	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A	2:00	N/A	N/A

جمعیتوں کی تفصیل

رقم خدمت	بیماری	اتفاقیہ	استقامی	میزان	بیماری	اتفاقیہ	استقامی	میزان	بیماری	اتفاقیہ	استقامی	میزان
خالیہ ماہ		02										
گذشتہ ماہ		06				03			01		0	
میزان		08				03			01		0	



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the November 7, 2022

NOTIFICATION

No. SO(SF)ESSED/4-17/2022/Mst. Ambareen Anjum/HM/Peshawar: WHEREAS Mst. Ambareen Anjum, Ex-Headmistress (BS-17), GGHS Qasab Khana Peshawar now at the disposal of Directorate of E&SE was proceeded against under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. AND WHEREAS Ms. Zuhra Nigar (PMS BS-18), Director, PDMA and Mr. Liaqat Ali (MC BS-18) Deputy District Education Officer (Male) District Mohmand were nominated as Inquiry Committee to conduct Formal Inquiry under the ibid Rules, against Mst. Ambareen Anjum, Ex-Headmistress (BS-17), GGHS Qasab Khana Peshawar now at the disposal of Directorate of E&SE, for the charges leveled against her.

3. AND WHEREAS the Inquiry Committee after having examined the charges, evidence on record and explanation of the accused, has submitted the report.

4. AND WHEREAS the Competent Authority (Chief Secretary) after having considered the charges and evidence on record, inquiry report, explanation of the accused in response to the show cause notice and personal hearing granted to her by Additional Secretary, Law Department on behalf of the Competent Authority on 12.10.2022 is of the view that charges against the accused have been proved.

5. NOW, THEREFORE, in exercise of the powers conferred under section 14 (5) of the ibid Rules, the Competent Authority (Chief Secretary), is pleased to impose major penalty of "Dismissal from service" upon Mst. Ambareen Anjum, Ex-Headmistress (BS-17), GGHS Qasab Khana Peshawar now at the disposal of Directorate of E&SE with immediate effect.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar.
4. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
6. Section Officer (Schools/ Female), E&SE Department.
7. Incharge EMIS E&SE Department.
8. Mst. Ambareen Anjum, Ex-Headmistress (BS-17), GGHS Qasab Khana Peshawar now at the disposal of Directorate of E&SE.
9. Headmistress, GGHS Qasab Khana, Peshawar with the direction to deliver the said notification to the accused officer.
10. Office order file.

(Signature)
07/11/22
(Bilal Khan)

Section Officer (Inquiries)

S. J. Khan
(Signature)
17/11/22

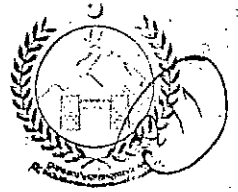
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18/11/22

Annex D-13

43

Government Higher Secondary School
Urmar Bala Peshawar

Email: ghssurmarbala@gmail.com



199

No 410 Date 17-02-2022

The DEO (F)

Peshawar

Subject: Enquiry Report.

Memo;

Enclosed here is the enquiry report about Mian Arshad (Naib Qasid) and others of GGHS Qasab khana Peshawar. It is submitted for further necessary action please.

Regards,

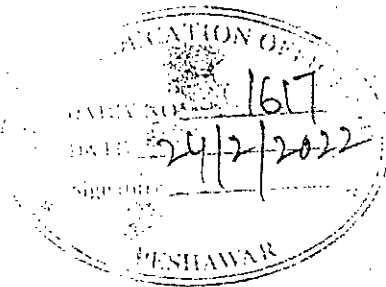
Professionally

Farzana Lal Sher

Principal GGHS

Chamkani

FARZANA LAL SHER
Principal
GGHS Chamkani



Ihtiram Khan

Principal GHSS

Urmar Bala

Principal
G.H.S.S. Urmar Bala
Peshawar

Enquiry Report about Mr. Mian Arshad Khan Naib Qasid, Govt; girls High School Qasab Khana Peshawar.

Objectives of the Enquiry:

The competent authority appointed Mst. Farzana Lal Sher Principal GGHS Chamkani and Mr. Iltirani Khan Principal GHSS Umar Bala Peshawar to conduct a formal inquiry about Mr. Mian Arshad Khan Naib Qasid, Govt; girls High School Qasab, Khana Peshawar regarding complaint/FIR lodged against him in Police Station Yakatoot by one of the parents for raping/sexually harassing her daughter, a student of class 7th GGHS Qasab Khana Peshawar and to submit a report to the competent authority with recommendations.

Problem Review:

As per information from a fact finding enquiry into the matter by Abdul Saeed Principal Government Shaheed Afaq Ahmad high School Cantt Peshawar (Cantt No 3) a student named Hira Batool, the student of class 7th B GGHS Qasab Khana Peshawar whose attendance register record shows her last class attendance on Nov 6th, 2021 and her mother Mst Kalsoom who is also a member of the school Parents Teachers Council, on Nov 10th 2021 called on Mst Ambreen, the school headmistress, and told her that her daughter Hira Batool is not feeling well and that they (her parents) are quite anxious about her and that they are treating her by a doctor. On Nov 12th 2021 she lodged an FIR in the local Police Station Yakatoot that Mr. Mian Arshad Khan Naib Qasid (who was appointed as Naib Qasid on Feb 22nd 2012 under Office Order No:4106 date 21-2-2012 (Annexure A)) raped her daughter on Nov 6th 2021 in the school canteen (illegally run by Mian Arshad for eight years in a portion of a class room, separated by a kachaa wall from the rest which was used as clerk office by the junior clerk Mr. Nasir Iqbal) after school timing. (Annexure B)

Nov. 13th 2021 the local police came to the school with the victim and her parents and arrested the accused Mr. Mian Arshad Khan N/Q of the concerned school. The mother of the victim started beating Raheela, the head girl of class 9th A, shouting that she took her daughter Hira Batool in the room (canteen) of Mian Arshad Khan where the incident took place. The accused was produced before the court of law, who was later on sent to Jail and the case is under trial in the court of law.

Annex

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Data collection Tools:

Information received from the fact finding enquiry into the matter by Abdul Saeed Sb Principal GHSS No 3 Cantt Peshawar, Interview, Questionnaire, Openionnair, FIR, Observation of the school canteen, class 7th B, Headmistress Office and the junior clerk office.

Venue : Government Girls High School Qasab Khana Peshawar.

Date : Jan/ Feb. 2022

Indicators:

- A detailed interview of the Headmistress GGHS Qasab Khana Peshawar.
- An Interview with written statement of Mst Nargas Parveen SST G GGHS Qasab Khana Peshawar.
- Interview and written statement of Hira Batool and her mother.
- Written Statements and discussion session with the teaching staff
- Written Statements of the students of class 7th B the class fellows of Hira Batool.
- Interview and written statement of Wajid the school chowkidar.
- Inetrview written statement and personal hearing of Nasir Iqbal J/C.
- Inetrview written statement and personal hearing of Nasir sweeper.

Method and Procedures:

As the enquiry committee discussed the matter with the DEO (F) Peshawar in detail, getting the full information, added by the enquiry report of Mr. Abdul Saeed Principal Cantt 3. The committee then moved to the school concerned. Mst Farzana Lal Sher principal GGHS Chamkani visited the home of Hira Batool as it was considered by the committee not to call her to the school in this scenario. Hira Batool and her mother were interviewed in detail. And written statement was also taken from Hira Batool (G1). After that the mother of Hira Batool accompanied Mst Farana lal Sher to the school to see the other member (Ilitiram Khan principal GHSS Urmar Bala) of the enquiry committee and to discuss the situation with him. Both the Ladies were accompanied by Mst Saima Yousaf CT. All the three ladies in the presence of the school incharge Mst Nargas Parveen SST G gave detailed information to the enquiry committee. Each and every aspect of the case was discussed in detail. After that the Junior Clerk Mr Nasir Iqbal and Mr.Nasir sweeper were called to the office of HM and were interviewed in details and written statements were also taken from them(H1, H2). Both these fellows were not cooperating. They did not furnish any information. Their behavior and attitude was suspicious as if they were hiding something. But their

Annex D - 16

46

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statements were matching. It was clear that they had made up their minds not to disclose anything relying just on saying that they knew nothing. The committee in presence of the in charge then visited class 7th B and the place where canteen existed and the clerk's office.

In her statement Hira Batool complained of Raheela, the head girl of class 9th who had taken Hira Batool to the canteen and acted as supplier in this case. This provides a proof that this Mian Arshad had prepared a network for his heinous acts. But this Raheela, we were told, does not respond to any question in this regard and has been guided by her father not to respond to any one in this regard and to ask them to contact her father. We avoided this to keep the matter confined and not to involve others thereby making it further problem for the department. On our return it was recommended to the worthy DEO (F) to immediately ban the junior clerk Nasir Iqbal and Nasir sweeper from the school as their presence is not good in this situation. Later on the committee was called to conduct personal hearing of the two fellows Nasir Iqbal Junior Clerk and Nasir sweeper who had been issued with charge sheets. Both of them were called to the DEO (F) office and were heard in the presence of the office superintendent. But today again their statements were the same not ready at any cost to disclose anything may be because of the fear that if they disclose anything about the situation in the school their own misdeeds will also be disclosed.

Back to the fact finding enquiry report of Saeed sb enquiry who had called this junior clerk Nasir Iqbal to his office GHSS No3 cantt Peshawar where he was questioned about the complaint lodged against him in the school by a family of a primary school students to whom he has shown nude pictures a few months back. On this occasion Nasir Iqbal told Saeed sb that not only Canteen but the school HM office was also frequently used by this Mian Arshad for his heinous activities after school off time. When Saeed sb asked him to give it in written Nasir Iqbal J/C refused asking that by doing so he is endangering his own life and service. But here in front of us he is totally oblivious of these and such other activities thereby proving himself to be a liar and not trustworthy. Furthermore the statements of the students also do not present Mr. Nasir Iqbal to be a man of character.

(The statements of the students clearly show that Nasir sweeper has clearly been involved in the immoral activities in the school. His suspicious looks and his suspicious movements is a proof to that or the vice versa. The statements of the students describe him a characterless man.)

Wajid chowkidar was also questioned in this regard. He also submitted a written statement. He on a number of occasions raised objections to the activities of Mian Arshad N/Q but could not afford to go further because he probably could not afford enmity with other class IV staff.

Findings:

Utilizing the above mentioned tools, methods and procedures the investigators reached at the following findings that;

- Mst Ambareen the HM of the school has committed a negligence in her duty by allowing herself to be guided by this Mian Arshad thereby hiding his evil and heinous activities and using the institution (HM office and its furniture was used by the culprit for his immoral activities after the school time where he forced girls students to stay with him. He has the key of this office. He usually stayed here till evenings) for his vicious acts. With this negligence she became a source of torture and disgrace for respectable families and innocent girls' students and also a source of shame and defame for the whole department.
- She allowed Mian Arshad N/Q to run an illegal Canteen in the school premises which was used for illegal and immoral activities turning it into a dark room. Illegal financial benefits were also gained from it, some of which were even given to her in the form of gifts and takeaway food items in the form of lunch boxes.
- The HM usually left the school an hour earlier encouraging ill-discipline in the school thereby allowing everyone to go for their own mean activities.
- Making Mian Arshad a special man encouraged other male supporting staff to go for their own ill wishes spoiled them and they started taking benefits from this situation in the school.
- The junior Clerk Mr. Nasir Iqbal who has been involved in showing nude pictures to the students on one hand and neglecting his duties on the other hand has not done justice with his position, age and stature. As a clerk he should have warned the HM of the situation or should have reported the situation to the high ups in the district administration. He even tried to mislead the enquiry committees by not providing the facts. It has been a criminal negligence on his part.
- (Mr. Nasir the sweeper can be expected ^{to do} anything ~~to do~~ in this situation. He has cashed the situation to his own benefits probably he could not do further otherwise he would have been the worst. Statement of 11 Students highlight the character of Nair Sweeper when he is winking, Staring, Lecherous Smiles, and touching the students. It indicates his poisons nature)
- Of all the male supporting staff Mr. Wajid chowkidar is probably the only class IV who has done justice to his duties.

Conclusions:

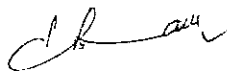
The investigators reached at the following conclusions from the above findings that:

1. Mst Ambareen the HM has committed a criminal negligence. She has rendered herself unfit for government service.
2. Mian Arshad has been guilty of destroying the life of an innocent girl. He has been involved in such activities in a number of cases which remained undisclosed. He also has been involved in unlawfully making money in the school by running an illegal canteen.
3. Mr Nasir Iqbal J/C did not leave himself fit for this post.
4. Nasir sweeper is not fit to be kept as sweeper after such reports about his charcter.


Recommendations:

It is recommended that:

1. Mst Hira Batool case is being adjudicated in the court of law.
2. Mian Arshad N/Q has committed a crime by involving himself in the illegal and immoral activities in the school premises. He may straightaway be dismissed from service.
3. Mst Ambareen HM may be proceeded against for criminal negligence in her duty.
4. Nasir Iqbal J/C may be removed from service for being negligent in his duty and indulging in immoral activities.
5. Mr. Nasir sweeper is not fit for government service because of his characterless nature. He may be removed from service for having bad eyes on the girls' students in the school.



Principal
Govt Higher Secondary School
Urmar Bala Peshawar



PRINCIPAL
Govt. Girls Higher Secondary School
Urmar Chakiani Peshawar

Annex C-6

99

29/11

OFFICE OF THE PRINCIPAL GOVT. SHAHEED SYED AFAQ AHMAD HIGH SCHOOL NO.3
PESHAWAR CANTT

No. 1002
Date 29/11/2021

To

The District Education Officer (F)
Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar.

*D.A. concerned
put up on file
for further
on per note
3/11/21*

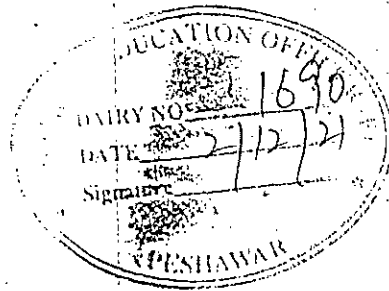
Subject: ENQUIRY REPORT.

Memo

Enclosed here is the enquiry report along with the clear cut recommendation about Mian Arshad (Naib Qasid) and others of GGHS Qasab Khana Peshawar is submitted for further necessary action please.

[Signature]
ABDUL SAEM
M.Sc, M.Ed, LLB

Principal/ Inquiry Officer
Govt. Shaheed Syed Afaq Ahmad
High School No.3 Peshawar Cantt



Annex C-1

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41

OFFICE OF THE PRINCIPAL GOVT SHAHEED SYED AFAQ AHMAD HIGH SCHOOL NO.3
PESHAWAR CANTT

INQUIRY AGAINST MR. MAIN ARSHAD KHAN, NAIB QASID, GGHS QASAB
KHANA PESHAWAR CITY.

INTRODUCTION

The competent authority has appointed Mr. Abdul Saeed Principal (BS-19) and Mst. Bibi Tasleem (HM) GGHS Qaidabad Peshawar to conduct inquiry against Mr. Mian Arshad Khan, Naib Qasid, GGHS Qasab Khana Peshawar regarding complaint/ FIR lodged under Section 377B-PPC and 53 CPA at police station Yakatoot Peshawar City.

BRIEF HISTORY OF THE CASE.

Mr. Mian Arshad Khan, Naib Qasid was appointed as a Naib Qasid on 22-02-2012, under office order No.4106-10 dt 21-02-2012 (Annexure A). His date of birth is 03-04-1977. He has a well-dressed personality and took a commanding position in the school, doing all the official works like dealing with AG office, DEO office and Directorate of E&SED. He has been running an illegal canteen for the last 8 years. He fully handicapped all the employees of the school and acted as a "master key" at the girl's school. As per information a student named Hira Batool, the student of class 7th (B), whose record reflects her last class attendance on 6th November 2021. Her mother Mst. Kalsoom is the member of school PTC. As per information, Mst. Kalsoom mother of the victim was called by Mst. Ambareen HM regarding some unknown work. She came to school on 10th November and told the IIM that her daughter Hira Batool is not feeling well and we are so conscious about her, trying to get her treated by doctor. On 12-11-2021, she lodged an FIR in the local police station that Mr. Mian Arshad Khan (N/Q) raped his daughter on 06-11-2021 in the canteen room after school timing (Annexure B).

On 13th November 2021, the local police came to school along with the victim and her parents and arrested the accused Mr. Mian Arshad Khan (N/Q) of the concerned school. The mother of the victim started beating the head girl Mst. Raheela of class 9th (A) and shouted that she took my daughter in the room of Mr. Mian Arshad Khan (N/Q) where the incident happened. The accused was produced before the court of law, who allow a three day remand of the accused and giving him in the custody of the local police. After three days on 17-11-2021, the accused Mr. Mian Arshad Khan (N/Q) was sent to jail and the case as under trail in the Court of Law.

INQUIRY PROCEEDINGS.

The inquiry committee received the notification of the inquiry on 15-11-2021. Keeping in view the sensitivity of the case, the inquiry committee quickly moved to the concerned school that is GGHS Qasab Khana Peshawar, where Mst. Ambareen was the IIM. The committee visited the

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anxious/1A/1
office of the HM where she briefed about the situation and tried to show the accused Mr. Mian Arshad Khan (N/Q) as an innocent, blameless and clean handed man and blamed the victim student along with her parents as a false and cheater student. HM of the concerned school discussed the technicalities of the case. The briefing of the HM was totally one sided and the committee seriously thought about the actual facts that why a minor student of class 7th (B) alleged the Naib Qasid and what was the connection between Mr. Mian Arshad Khan (N/Q) and such student and what were the circumstances which compelled the student to get close to Mian Arshad (N/Q) who does such immoral and criminal acts with such student.

After a thorough discussion, the committee decided to have a visit of the school and specially the victim's class i.e. 7th (B). The committee visited the place of incident which was a dark room of size (6"x12") where a Charpoy and mattress was lying inside the room. The room was separated from a class room by a 9 feet high wall and such class room was converted into Clerk's Office. The HM was asked that why a separate room was given to a Naib Qasid of the school, her reply did not satisfy the committee as he had occupied the room since long even before her transfer.

The committee then visited the victim's class room i.e. 7th (B). the class room was situated on the other side of the school in front of Primary Section. The total strength of the class was 56 and the girl students were sitting on the floor of the class having no furniture. Certain questions were asked by the committee from the student of the class 7th (B), but still some alleged silence was observed from students of such class. The committee stayed about 10 to 15 minutes in the class room but no information regarding such incident came out. While coming out from the class the committee thanked the subject teacher for giving time during the class (HERE THE FACTUAL POSITON CAME OUT), which turns and deviates the direction of the inquiry into a positive and fruitful direction "A CT teacher named Mst. Saima Yousaf told slowly to the committee that when a canteen is runs, in the girls school by a male then we may expect more casualties like Hina Batool's case in the future..

Here the inquiry committee used harsh tone to the HM of the concerned school that why she is hiding the actual information/ facts from the inquiry committee and trying to dodge the inquiry committee. The HM was immediately sent to her office and then again a conversation session was conducted with the students of the victim's class. Now all the students of the class shouted that Mr. Mian Arshad Khan (N/Q) is a very bad man, he is involved in immoral practices with a lot of students. As per statement of students, Mr. Mian Arshad Khan (N/Q) took each and every girl student inside the room for giving canteen items. He did not want to give items outside the dark room because he usually touched every girl inside the room and the HM of the concerned school supported him in criminal activities, by hiding and ignoring all such activities. These information's were very shocking and disappointing for the inquiry committee.

Keeping in view the dangerous situation of the concerned school, the inquiry committee immediately issued direction which are as followed;

1. A security committee was constituted which is headed by Mst. Nargis Perveen SST (G) a senior most staff member and 3 more staff members were included as members of the committee constituting of
 1. Mst. Nargis Parveen (SST) Chairperson
 2. Mst. Saima Yousaf (CT) Member

Annex C-9

concerned and anxious (W1)

52

221

(W2)

3. Mst. Chanda (CT) Member
4. Mst. Maria (SST) Member
2. Direction was issued for demolishing the wall which separates the office of the Clerk, creating a dark room in such portion immediately.
3. Such room was quickly handed over to the staff of the school for starting a new class room for those classes which are heavily crowded.
4. The back side of the school, which was totally hidden from all the staff of the school and was quite dangerous for any criminal activity was immediately blocked by developing a wall and instruction were given for the proper use of the school way.
5. It was noticed that the CCTV camera were out of order, direction regarding maintenance of those cameras, was issued to the authorities of school.

Instructions were given to the administration of the school that comply the issued direction in letter and spirit and the inquiry committee will again visit the school. The inquiry committee again visited the school with the gap of one day, the committee collected a lot of verbal information regarding attitude of different male Class-IV including the Clerk of the concerned school. All the information was very shocking for the committee.

On 17-11-2021, the committee visited the school and chaired a staff meeting in the Break Timing of the school. The staff members were directed to submit a written statement regarding the recent scenario. Then statement from students of 7th (B) were collected by given only two questions.

سوال نمبر 1 نائب قاصد اور کیتھن چلانے والے ارشد ماما کے متعلق اپنے خیالات کا اظہار کریں۔
سوال نمبر 2 کیا ارشد ماما کے علاوہ کوئی اور ملازم بھی غلط انسان ہے یا نہیں۔

In reply of such questions almost all the students submitted adverse remarks, even many of the students admitted that Mr. Mian Arshad Khan (N/Q) touches them, but they did not tell anyone, they submitted that Arshad Mama offered and forced the students to enter in his room and he refused to give canteen item outside the room. He always insisted to come inside the dark room. The student were asked that why they did not inform the HM of the school regarding such things?? The students replied that Arshad Mama was the special person of the HM and they were afraid of the strange nature of HM regarding Mian Arshad (N/Q) (Annexure C1, C2-----C11).

As per staff statements (teachers) they did not know about Main Arshad Khan's (N/Q) criminal activities and now after such incident in the school their respective students told a lot about the male staff of the school which are not expressed in words. They came to know about all these shameful activities of Naib Qasid very late. The inquiry committee observed the guilt feeling of the staff and most of them were found weeping after recording their statements, as most of them are also the mothers of young daughters at their homes (Annexure D1, D2-----D16).

"But only one person was not shameful and she was Mst. Ambareen HM of the concerned school. After recording the statements of the staff and students who confess and explain the criminal activities running at school, she asked the committee if Mian Arshad Khan (N/Q) gets released from the jail please allow him to come to our school." These words killed the human behavioral norms and moral dignity of the inquiry committee that she has no concern about dozens of girl's students of the school that what happened to them? How will she face the parents of such victims.

Annex C-10
ing the evil acts of Mian Arshad Khan (N/Q)? But she was only concerned and anxious
Mian Arshad (N/Q) and her utmost wish was that such person shall be released from Jail by
any means.

53
220
At that moment the inquiry committee felt that the presence of Mst. Ambareen, at GGHS Qasab Khana Peshawar City as head of such institution is very dangerous and in her presence the free and fair inquiry is not possible. Then the committee quickly approached to the Worthy Director E&SED Khyber Pakhtunkhwa and briefed about the current situation, who quickly issued direction to Mst. Samina Ghani DEO (F) Peshawar to place the services of Mst. Ambareen HM at the disposal of Directorate E&SED Khyber Pakhtunkhwa and appointed Mst. Nargis SST (G) as Incharge HM till the arrival of the new HM at GGHS Qasab Khana Peshawar.

The statements of students reflect that all the Class-IV's of the concerned school are involved in criminal activities including Mr. Nasir (Sweeper) and Mr. Nasir Iqbal (J/C) of the concerned school. A few days earlier from such incident some parents came to school and complaint about the criminal behavior of the Nasir Iqbal Clerk of the school. They blamed that Mr. Nasir Iqbal (J/C) showed nude pictures to one of the girl's student, but the HM Mst. Ambareen forwarded such case to Mian Arshad Khan (N/Q) to resolve the issue and who resolved it by his own means. The case was neither reported nor even any action was taken against the concerned Clerk. Mr. Nasir Iqbal (J/C) was called in the office of Mr. Abdul Saeed (Principal) Govt Shaheed Syed Afaq Ahmad High School No.3 Peshawar Cantt who explained all the evils activities running in the school. He explained that such things happened not only in the dark room of Mian Arshad Khan (N/Q) but the HM's office was frequently used for such criminal activities. Because the HM has given her office keys to Mr. Mian Arshad (N/Q) who stayed late in the school premises. He told that all such evil activities usually, happened after school closing as the HM leaves the school one hour before closing time in routine. While all the teaching staff leaves the school quickly soon after school closing.

No staff member was left at school who look after the late going girls waiting in the school and in such duration Mian Arshad Khan (N/Q) does such shameful activities. But when the inquiry committee asked Mr. Nasir Iqbal (J/Clerk) to write such facts in his statement, he refused to do so which means that Mr. Nasir Iqbal is also involved in criminal and evil acts-feeling in danger that if he disclosed the facts in writing then the other Class-IV's will also disclose those facts regarding his criminal activities.

The most important is the statement of school Chowkidar Mr. Wajid Ali, who has been residing in the premises of the school room for the last eight years. He submits that usually Mian Arshad (N/Q) stay in the school till evening, observing suspicious activities which creating routine problems at school. As in the past a girl student complaint about Mian Arshad (N/Q) that he showed nude pictures in his mobile set, but no action was taken by the concerned HM. He submits that he usually use HM office where the girls student stay with him after school timings. He also submits that whenever he saw a criminal activity done by Mian Arshad Khan (N/Q) he advised him not to do such action as his wife and children are residing in such school but he always fought with me. He also submits that he had reported about such criminal events to all the HM including Mst. Neelam Qayyum, Mst. Farzana and present HM Mst. Ambareen, but no action was taken by such Head Mistresses. He also records that all the Class-IV and old staff of the school knows each and every thing regarding Mian Arshad Khan (N/Q) evil attempts (Annexure E1, E2).

53A

Annex C-11

He submits that I am a Chowkidar living in the premises of the school and my duty is to inform the HM of the institution about any illegal activity. Being a poor man I was not able to take enmity with Mian Arshad Khan (N/Q) even all the teaching staff make criminal silence on such activities if action was taken on proper time then such situation would not have happened as today.

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38

VITAL POINTS.

1. Mst. Ambareen the Head Mistress of GGHS Qasab Khana Peshawar has a criminal negligence over the suspicious and evil activities of Mian Arshad Khan (N/Q) and others.
2. Mst. Ambareen the Head Mistress of GGHS Qasab Khana Peshawar trying to dodge and misguide the inquiry committee, hiding facts and saving the accused Mian Arshad Khan (N/Q) from any disciplinary action.
3. Presence of dark rooms in the premises of the girls school where frequent movement of girls was allowed, creating a wide space for male officials of the school for the fulfilment of their evil needs.
4. Autocratic attitude: Creating gap with the students and allowing certain officials as special persons of the Head of the institution results in destruction of human Norms.
5. When the inquiry committee used lenient and sympathetic attitude, the students expressed all their internal catharsis in front of the inquiry committee.
6. Allowing canteens, in the girl's school run by male staff results in creating criminal and illegal activities within the girls school.
7. Absent from duties, leaving the school before closing time, creating gap with the staff and adopting monarchy within the school will spoil the peaceful environment of the institution.
8. The behavior and attitude of Mian Arshad Khan (N/Q) spoils the habits of other class-IV's too.
9. (The attitude of Mr. Nasir (sweeper) of the concerned school is also quite objectionable.)
10. Mr. Nasir Iqbal (J/C) of the concerned school who hid the facts regarding a sensitive inquiry, is also involved in many objectionable, immoral and criminal activities within the institution.
11. Mr. Wajid Ali (Chowkidar) is the only male employce who slightly justified his duty seems raised objections on the evil activities of the male staff at GGHS Qasab Khana Peshawar and reported complaint about the behavior, suspicious and criminal activities to the Head of the institution because of the very fact that his family and daughters are residing in the premises of the same school. He strictly bounded his wife and children not to come out of their quarter due to dangerous and criminal environment of the school.
12. Honest, bold and fair teachers like Mst. Saima Yousaf (CT) are the asset of Elementary and Secondary Education Department KPK and the inquiry committee is fully thankful for his efforts and performance for tracing such black sheep's in the school.

RECOMMENDATIONS.

1. Hira Batool rape case is Sub-juiced in the Court of Law.
2. The appointment order of Mian Arshad (N/Q) may please be verified.

[Handwritten signatures]

Annex C-12

54

3. Mian Arshad (N/Q) GGHS Qasab Khana Peshawar may please be dismissed from his service, due to his involvement in criminal and immoral activities with girl's student within the premises of GGHS Qasab Khana Peshawar.
4. Mr. Nasir Iqbal (J/C) GGHS Qasab Khana Peshawar may be removed from service for hiding-factual information and involvement in criminal and immoral activities.
5. Mr. Nasir (Sweeper) GGHS Qasab Khana Peshawar may be removed from service as per written complaints from most of the girl's students about his characterless attitude.
6. Mst. Ambareen HM of GGHS Qasab Khana Peshawar may be proceeded for criminal negligence in his service.
7. An appreciation letter may please be issued in favor of Mst. Saima Yousaf (CT) for her sacrifices and meritorious performance for tracing such evil acts within the institution.

ABDUL SAEED
PRINCIPAL (BS-19)
M.Sc, M.Ed, LLB

Govt Shaheed Syed Afaq Ahmad
High School No.3 Peshawar Cantt

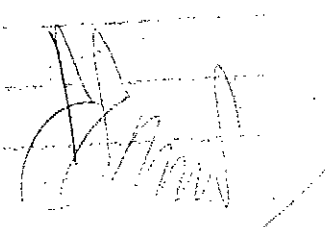
MST. BIBI TASLEEM
HEAD MISTRESS (BS-17)
GGHS Qaidabad Peshawar

1 اسکول کے نائب فاضل اور کینٹین جلات والے اڈیشنر ماسٹر
 کے متعلق اپنے خیالات کا اظہار کریں؟

2 شہر جیت 10:00 AM پر چھٹی ہوئی تھی تو میں اپنی کزن کے
 لئے روکتی تو اس نے مجھ سے پوچھا کہ کیا کر رہی ہو
 تو میں نے جواب دیا کہ میں اپنی کزن کے لٹ بیٹی بیوں میں
 کزن کے پیڑھے اس کی 12 بجے چھٹی ہوئی تھی میں ناصرہ نے
 سامنے بیرونی منگونی تو جب وہ اس ناصرہ کو ہونے لگا
 دیا نا تھا تو وہ اس سے ماما کینٹین کے پائلٹ گئے اور میں نے
 اپنے بسکٹ لائے پر میں نے واپس کر دئے تو اس نے پوچھا کہ
 کہ میں تم سے ففا پو ماؤ گا تو میں نے بسکٹ لے لیا
 اور اس کو پیسے دینے کہ یہ بے لومیں کسی سے پیسے
 بھر چیزیں ہتی لیتی -

شہر ناصرہ ماما -

شہر ہاروں آگے اور خود پیسے پیسے
 اتنی صفائی نہیں کرتا تھا جسٹن لوکتیوں کو دیکھنا
 تھا سر انگھوں میں انگھیں ڈکتر نور تماشا



7th (B) حرمہ اللہ

سرس (شکول کے نائب، قاض اور کینٹین) چلانے والے ارشد

ماما سے متعلق اپنے خیالات، ملاحظیات اور کہیں،

ج وہیں، پیش کرتے تھے۔ لڑکیوں کے حالات، تعلیم، تہ

سرخاں لڑکی، سوئی تھی وہ لڑکیوں کو قرض چھیننے

دیتا تھا۔ اور لڑکیوں کو عجیب نظر سے دیکھتا تھا۔

سرس (2) ایسا ارشد ماما سے ملا، کوئی اور ملازمت بھی نہ پاتا تھا

پہلے دیکھا ہے کہ تم میں، تو کون کون ہیں اور وہ بکھیرا

ج سرنا لڑکیوں کو عجیب نظروں سے دیکھتا ہے اور

تکلیف دیتا ہے۔

سرس

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

PRINCIPAL
Govt. Sharda High School
High School, Quaidabad

سید عبدالرحمن صاحب

سکول سے نائٹ مقاصد اور کینیڈین چلانے والے
ارٹھو ماما سے تعلق اپنے خیالات کا اظہار کریں

24

ارٹھو ماما پرستہ اور انسان تھے۔ وہ لڑکیوں
سے سادہ اچھا نہیں کرتے تھے۔ اللہ تعالیٰ اس کو
بخیر معاف فرمائے۔

ایسا ارٹھو ماما سے علاوہ کوئی اور ملازم یعنی
غلام انسان سے یا نہیں ہے؟ اگر ہے تو کون کون سے
اور وجہ لکھیں؟

وہ لڑکیوں کو عجیب نظر سے دیکھتا ہے۔
ماما یعنی غلام انسان سے۔

HEAD MISTRESS
G.G.H.S.
JALANDHAR

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منجلی

اس کے اسلوب کے نائب قاصد اور لیشن چلانے والے ارشد ماما

متعلق خیالات کا اظہار نہیں ہے

ارجح اس نے مجھے ایسا تھا صبر ہے ساتھ دوستی کر رہا ہے۔

اس کے ارشد ماما کے علاوہ کوئی اور ملازم بھی غلط انسان نہیں ہے لہذا اس کے لئے کوئی ایسا وجہ نہیں ہے

ارجح ایسا ہی دوستی بھی فائل کلاس میں ہے صرف اسے Touch پینا تھا اور اس کو آٹھ بھی ماری تھی۔

HEAD MISTRESS
G.C.H.S.
MINDAHEAD

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Ramazan

بہن - سکول کے نائب قاضی اور کینیڈین چیلانے والے
ماما کے متعلق اپنے خیالات کا اظہار کریں

جے جو بھی ایف ایف ایف کے بارے میں تو کہتے تھے وہ کیا بنے
نادرہ ماسک نیچے کرو

کیا ایف ایف ایف کے علاوہ کوئی اور ملازم بھی غلط نشان ہیں
جی ہاں ارشد ماما ہیں وہ بھی تھے اور ناہر ماما بھی
ناہر ماما تھے لیکن کوئی انہیں مانتے تھے

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

Govt. High School, Quaidabad

(4B)

Day: **MTWTFSS**

Date: **17/Nov/2021**

(عبد فاطمہ عبدالرشید)

سوال: کیا ارشد ہمارے علاوہ کوئی اور ملازمت بھی کر رہا ہے؟
جواب: نہیں، صرف ایک ہی ملازمت ہے۔

سوال: کیا ارشد ہمارے علاوہ کوئی اور ملازمت بھی کر رہا ہے؟
جواب: نہیں، صرف ایک ہی ملازمت ہے۔

سوال: کیا ارشد ہمارے علاوہ کوئی اور ملازمت بھی کر رہا ہے؟
جواب: نہیں، صرف ایک ہی ملازمت ہے۔

جلیں

نام: **عبد فاطمہ عبدالرشید**
پتہ: **گورنمنٹ سیکولر ہائی اسکول، کراچی**

تاریخ: **17/11/2021**

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

PRINCIPAL
Govt. Shohani
High School

نام: کریم احمد

(37)

سازوں کے نائب نامہ اور کینٹین چلانے والے ارشد عام کے

ایک خیالات کا اظہار کریں:

جواب: شرکیوں کو ارشد عام فری چیز دینا تھا:

اور انہیں کہنا تھا کہ جو شرکی چیز لے رہے وہی صرف

ایک اندر آئے

شرکیوں کے ساتھ کب شب بھاگا تھا:

پیسوں کے بہانے شرکیوں کے ہاتھ پکڑنا تھا:

سے لیا ارشد عام کے علاوہ کرنی اور ملازم یعنی غلط انسان اور

طہنیں لٹریں لڑکوں کو دے دیں اور وہ لکھیں؟

جواب: نامہ ماہانہ بہت ہی ختم ہو گیا اور ایک دن اس نے کوئی عجیب

حرکت کر لی تھی۔

یہاں لڑکوں کو بہت عجیب اور گنتی نظروں سے دیکھتا

ہے

HEAD OFFICE
SULTAN
LAKHAPUR
LAKHAPUR

FEDUCIAL

Govt. Education Deptt. Punjab
Lahore

Azim Azhar
Headmaster

Annex C1

62

(37)

سکول کے ناٹھ قاعدہ اور کینٹین حالات والے ارشدانہ
 کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے؟

اس کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے
 میں پیش درپس ہے کہ کینٹین کے متعلق
 Headmaster کو بھی پتہ نہیں چلے۔ میں اپنے
 آئی ٹی (اردو) کی پیش کردہ 2005 میں کوئی
 تقریباً اس کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے
 میں سکول میں اردو کے متعلق ایڈمنسٹریٹو
 کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے
 میں سکول میں کینٹین کے متعلق

بسیار ارشدانہ کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے
 میں کینٹین کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے
 میں کینٹین کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے
 میں کینٹین کے متعلق ایڈمنسٹریٹو کا اظہارِ رائے

(Handwritten Signature)

General Manager
 High School, District Council



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email ID.emisfpeshawar@gmail.com

NOTIFICATION:

1. WHEREAS the Principal Govt. Girls High School Qasab Khana Peshawar has reported that Mr. Mian Arshad S/O Mian Khadim Shah Naib Qasid of GGHS Qasab Khana Peshawar has been arrested by the police on the report / FIR lodged by Mst. Hira Batool Student of class-7th vide No Nil dated 13.11.2021.
2. AND WHEREAS Mr. Abdul Saeed, Principal, Govt: Shaheed Syed Afaq Ahmad High School No.3 Peshawar Cantt and Mst. Bibi Tasleem Headmistress Govt. Girls High School Quaid Abad Peshawar were appointed as inquiry officers vide this office notification No. 859-63 dated. 13.01.2022 to inquire against the above named official who is involved immoral activities as per FIR and to submit detail report into the matter.
3. AND WHEREAS the enquiry Officers has submitted enquiry report vide No. 10021 dated 29.11.2021, received t to this office diary No. 1690 dated. 02.12.2021. The enquiry officers have pointed out that Mr. Nasir Sweeper Govt. Girls High School Qasab Kana Peshawar attitude is characterless as per written complaint from most of the school girl's students of Govt. Girls High School Qasab Khana Peshawar and recommended for Removal from Service.
4. AND WHEREAS Another formal inquiry was conducted by Mst. Farzana Lal Sher Principal Govt. Girls Higher Secondary School Chmakani & Mr. Ehteram Khan Principal Govt. Higher Secondary School Urmar Bala Peshawar with the direction to submit documentary proofs / clear cut recommendations vide this office Endst No. 30-34 dated. 28.12.2021.
5. AND WHEREAS He was proceeded against under Khyber Pakhtunkhwa Govt: Servant rules 2011 for the charge leveled by the inquiry officers in their inquiry report and was suspended vide this office Endst No 362-67 dated. 01.01.2022.
6. AND WHEREAS Charge Sheet was issued to the above named official through Headmistress vide this office Endst No. 372 dated. 01.01.2022.
7. AND WHEREAS Another Inquiry committee has submitted that Mr. Nasir, Sweeper Govt. Girls High School Qasab Khana Peshawar is not fit to be kept as sweeper after such reports about his characterless nature. He may be removed from service for having bad eyes on the girl's students in the school.
8. AND WHEREAS a reply in response of charge sheet received from the official concerned vide Diary No. 2594 Dated: 10.01.2022, which was found unsatisfactory.
9. AND WHEREAS The competent authority, District Education Officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charge of misconduct / Negligence in duty against the accused has been proved.
10. NOW THEREFORE, in exercise of the powers under Rules-4(b)iii of Khyber Pakhtunkhwa Government Servants(Efficiency and Discipline Rules 2011, I, Samina Ghani, District Education Officer (Female) Peshawar is pleased to impose major Penalty of "Removal from Service" upon Mr. Nasir Sweeper Govt. Girls High School Qasab Khana Peshawar with immediate effect.

(SAMINA GHANI)
District Education Officer,
(Female) Peshawar.

Endst: No. 4454-60 / Special File GGHS Qasab Khana / Dated: 24 / 03 / 2022

Copy of the above is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- Deputy Commissioner Peshawar.
- 3- Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 4- PS to Secretary, (E&SE) Khyber Pakhtunkhwa, Peshawar.
- 5- District Monitoring Officer (EMA) Peshawar.
- 6- Head Mistress GGHS Qasab Khana Peshawar with the remarks to recover any over payment made to the above named Official and deposit it to Govt. Treasury under intimation to this Office.
- 7- Official concerned.

District Education Officer,
(Female) Peshawar

BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR

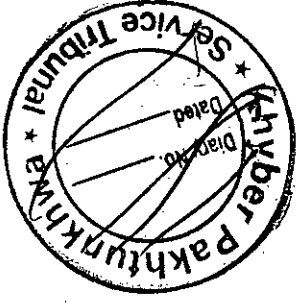
S.A No. 631/2022

Nasir Khan (Sweeper)



Versus

Education Department & other



APPLICATION FOR SUBMIT OF COMPLETE ENQUIRY REPORT ON BEHALF OF DEO FEMALE.

Respectfully Sheweth,

1. That the above titled case has been pending before this Hon'ble Tribunal for arguments today dated: 19/07/2023.
2. That the Hon'ble Tribunal on dated: 08/05/2023 directed the assistant advocate general to provide complete record before this Hon'ble Tribunal on dated fixed on 19/07/2023.
3. That after the office of the Additional Advocate General KP Service Tribunal Peshawar on No. 2462-66 dated: 14/06/2023 sent to the undersigned office with the direction to provide complete record on the subject case and attend the Hon'ble Tribunal on 19/07/2023.

It is therefore, most humbly prayed that on acceptance of the instant application, the complete record (enquiry report) may be placed on file.

3:10 pm
 19/7/2023
 Dated: 19/07/2023
 17301-3517716-1
 0314-9143930.

DEO Female
 Peshawar

29/11/2021
3

OFFICE OF THE PRINCIPAL GOVT. SHAHEED SYED AFAQ AHMAD HIGH SCHOOL NO.3
PESHAWAR CANTT

No. 1002
Date 29/11/2021

To:

The District Education Officer (F)
Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar.

*D.A. come reviewed
put up on file
for further process
as per rule
29/11/21*

Subject:

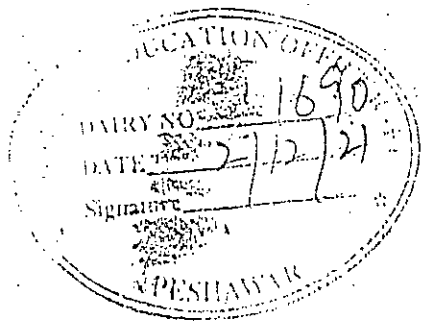
ENQUIRY REPORT.

Memo

Enclosed here is the enquiry report along with the clear cut recommendation about Mian Arshad (Naib Qasid) and others of GGHS Qasab Khuna Peshawar is submitted for further necessary action please.

AA
ABDUL SAEED
M.Sc, M.Ed, LLB

Principal/ Inquiry Officer
Govt. Shaheed Syed Afaq Ahmad
High School No.3 Peshawar Cantt





**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpehshwar@gmail.com**

No. 376 / SPI GGHS Qasab Khana Dated Peshawar the: 01 / 01 / 2022

To

**The Inch: Headmistress
G.G.H.S Qasab Khana
Peshawar**

Subject: CHARGE SHEET

Memo:

I am to refer to the subject noted above and to ask you to serve enclosed charge sheet upon Mr. Nasir Iqbal Junior Clerk, GGHS Qasab Khana Peshawar and submit a copy of receipt thereof as a token to this office for record.

**Dy: District Education Officer
(Female) Peshawar**

Endst No. 377-79
Copy of the above is forwarded to the:-

1. P.S to Sectary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Inquiry Officer
4. Master file.

**Dy: District Education Officer
(Female) Peshawar**



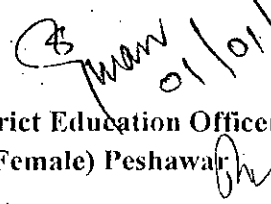
**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfeshawar@gmail.com**

CHARGE SHEET.

I, **Samina Ghani DEO (F) Peshawar** as competent authority hereby charge you **Mr. Nasir Iqbal, Junior Clerk of GGHS Qasab Khana Peshawar** as follow:

That you while posted as Junior Clerk, of GGHS Qasab Khana Peshawar, committed the following irregularities: -

- 1- You are involved in the illegal activities.
 - 2- In the light of students written statements, you were involved in immoral and criminal activities in the premises of school and threatened the students.
 - 3- You have hidden the facts & evidence and was trying to the save the accused Mr. Mian Arshad & others.
 - 4- You are also involved in many objectionable/criminal activities and you have handover all your office / clerical work to Mr. Mian Arshad Shah Naib Qasid of the said school.
2. By Reason of the above, you appear inefficient & guilty of misconduct under rule 3 of the Khyber Pakhtunkhwa Government servant (Efficiency and Discipline) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in Rule 4 of the rules ibid.
3. You are therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer /inquiry committee, as the case may be.
4. Your written defense, if any, should reach the inquiry officer / inquiry committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.


 District Education Officer
 (Female) Peshawar
 01/01/2022
 OC



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfpehawar@gmail.com**

DISCIPLINARY ACTION.

I, **Samina Ghani DEO (F) Peshawar** as competent authority, am of the opinion that **Mr. Nasir Iqbal, Junior Clerk GGIIS Qasab Khana Peshawar**, has rendered himself liable to be proceeded against, as he committed the following act/omission, within the meaning of rule-3 of the Khyber Pakhtunkhwa Government servant (Efficiency & Discipline) Rules, 2011, as:-

STATEMENT OF ALLEGATION.

- 1- You are involved in the illegal activities.
- 2- In the light of students written statements, you were involved in immoral and criminal activities in the premises of school and threatened the students.
- 3- You have hidden the facts & evidence and was trying to save the accused Mr. Mian Arshad & others.
- 4- You are also involved in many objectionable/criminal activities and you have handover all your office / clerical work to Mr. Mian Arshad Shah Naib Qasid of the said school.

2. For the purpose of inquiry against the said accused with reference to the above allegations an formal inquiry officer / inquiry committee, consisting of the following, is constituted under rule 10(1)(a) of the ibid rules.

I. Mst. Farzana Lal Sher, Principal, GGISS Chamkani Peshawar.

II. Mr. Ehteram Khan, Principal, GHSS Urmar Bala, Peshawar

3. The Inquiry Officer / inquiry committee shall, in accordance with the provision of the ibid rules, provide reasonable opportunity of hearing to the accused, record its finding and make, within thirty days of the receipt of this order, recommendations as to punishment or order appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join proceedings on the date, time and place fixed by the inquiry officer / inquiry committee.

*Mr. Nasir Iqbal, Junior Clerk
Office of the Headmistress,
GGIIS Qasab Khana, Peshawar*

Samina Ghani
01/01/2022
District Education Officer
(Female) Peshawar

69

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INQUIRY AGAINST MR. MIAN ARSHAD KHAN, NAIB QASID, GGHS QASAB
KHANA PESHAWAR CITY.

INTRODUCTION

The competent authority has appointed Mr. Abdul Saeed Principal (BS-19) and Mst. Bibi Tasleem (HM) GGHS Qaidabad Peshawar to conduct inquiry against Mr. Mian Arshad Khan, Naib Qasid, GGHS Qasab Khana Peshawar regarding complaint/ FIR lodged under Section 377B PPC and 53 CPA at police station Yakatoot Peshawar City.

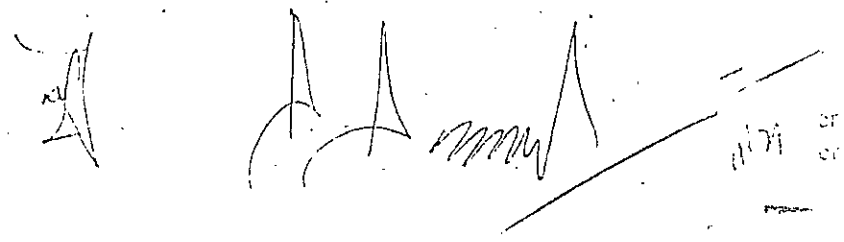
BRIEF HISTORY OF THE CASE.

Mr. Mian Arshad Khan, Naib Qasid was appointed as a Naib Qasid on 22-02-2012, under office order No.4106-10 dt 21-02-2012 (Annexure A). His date of birth is 03-04-1977. He has a well-dressed personality and took a commanding position in the school, doing all the official works like dealing with AG office, DEO office and Directorate of E&SED. He has been running an illegal canteen for the last 8 years. He fully handicapped all the employees of the school and acted as a "master key" at the girl's school. As per information a student named Hira Batool, the student of class 7th (B) whose record reflects her last class attendance on 6th November 2021. Her mother Mst. Kalsooin is the member of school PTC. As per information, Mst. Kalsooin mother of the victim was called by Mst. Ambareen HM regarding some unknown work. She came to school on 10th November and told the HM that her daughter Hira Batool is not feeling well and we are so conscious about her, trying to get her treated by doctor. On 12-11-2021, she lodged an FIR in the local police station that Mr. Mian Arshad Khan (N/Q) raped his daughter on 06-11-2021 in the canteen room after school timing (Annexure B).

On 13th November 2021, the local police came to school along with the victim and her parents and arrested the accused Mr. Mian Arshad Khan (N/Q) of the concerned school. The mother of the victim started beating the head girl Mst. Raheela of class 9th (A) and shouted that she took my daughter in the room of Mr. Mian Arshad Khan (N/Q) where the incident happened. The accused was produced before the court of law, who allow a three day remand of the accused and giving him in the custody of the local police. After three days on 17-11-2021, the accused Mr. Mian Arshad Khan (N/Q) was sent to jail and the case as under trail in the Court of Law.

INQUIRY PROCEEDINGS.

The inquiry committee received the notification of the inquiry on 15-11-2021. Keeping in view the sensitivity of the case, the inquiry committee quickly moved to the concerned school that is GGHS Qasab Khana Peshawar, where Mst. Ambareen was the HM. The committee visited the



...nce of the HM where she oriented about the situation and tried to show the accused Mr. Mian Arshad Khan (N/Q) as an innocent, blameless and clean handed man and blamed the victim student along with her parents as a false and cheater student. HM of the concerned school discussed the technicalities of the case. The briefing of the HM was totally one sided and the committee seriously thought about the actual facts that why a minor student of class 7th (B) alleged the Naib Qasid and what was the connection between Mr. Mian Arshad Khan (N/Q) and such student and what were the circumstances which compelled the student to get close to Mian Arshad (N/Q) who does such immoral and criminal acts with such student.

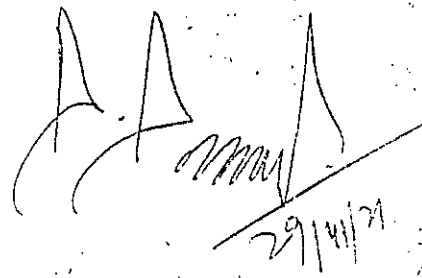
After a thorough discussion the committee decided to have a visit of the school and specially the victim's class i.e. 7th (B). The committee visited the place of incident which was a dark room of size (6"x12") where a Charpoy and mattress was lying inside the room. The room was separated from a class room by a 9 feet high wall and such class room was converted into Clerk's Office. The HM was asked that why a separate room was given to a Naib Qasid of the school, her reply did not satisfy the committee as he had occupied the room since long even before her transfer.

The committee then visited the victim's class room i.e. 7th (B), the class room was situated on the other side of the school in front of Primary Section. The total strength of the class was 56 and the girl students were sitting on the floor of the class having no furniture. Certain questions were asked by the committee from the student of the class 7th (B), but still some alleged silence was observed from students of such class. The committee stayed about 10 to 15 minutes in the class room but no information regarding such incident came out. While coming out from the class the committee thanked the subject teacher for giving time during the class (HERE THE FACTUAL POSITON CAME OUT), which turns and deviates the direction of the inquiry into a positive and fruitful direction "A CT teacher named Mst. Saima Yousaf told slowly to the committee that when a canteen is runs, in the girls school by a male then we may expect more casualties like Hina Batool's case in the future.

Here the inquiry committee used harsh tone to the HM of the concerned school that why she is hiding the actual information/ facts from the inquiry committee and trying to dodge the inquiry committee. The HM was immediately sent to her office and then again a conversation session was conducted with the students of the victim's class. Now all the students of the class shouted that Mr. Mian Arshad Khan (N/Q) is a very bad man, he is involved in immoral practices with a lot of students. As per statement of students, Mr. Mian Arshad Khan (N/Q) took each and every girl student inside the room for giving canteen items. He did not want to give items outside the dark room because he usually touched every girl inside the room and the HM of the concerned school supported him in criminal activities, by hiding and ignoring all such activities. These information's were very shocking and disappointing for the inquiry committee.

Keeping in view the dangerous situation of the concerned school, the inquiry committee immediately issued direction which are as followed;

1. A security committee was constituted which is headed by Mst. Nargis Parveen SST (G) a senior most staff member and 3 more staff members were included as members of the committee constituting of
 1. Mst. Nargis Parveen (SST) Chairperson
 2. Mst. Saima Yousaf (CT) Member


29/11/21

- 3. Mst. Chanda (CT) Member
- 4. Mst. Maria (SST) Member

291
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- 2. Direction was issued for demolishing the wall which separates the office of the Clerk, creating a dark room in such portion immediately.
- 3. Such room was quickly handed over to the staff of the school for starting a new class room for those classes which are heavily crowded.
- 4. The back side of the school, which was totally hidden from all the staff of the school and was quite dangerous for any criminal activity was immediately blocked by developing a wall and instruction were given for the proper use of the school way.
- 5. It was noticed that the CCTV camera were out of order. direction regarding maintenance of those cameras, was issued to the authorities of school.

Instructions were given to the administration of the school that comply the issued direction in letter and spirit and the inquiry committee will again visit the school. The inquiry committee again visited the school with the gap of one day, the committee collected a lot of verbal information regarding attitude of different male Class-IV including the Clerk of the concerned school. All the information was very shocking for the committee.

On 17-11-2021, the committee visited the school and chaired a staff meeting in the Break Timing of the school. The staff members were directed to submit a written statement regarding the recent scenario. Then statement from students of 7th (B) were collected by given only two questions.

سوال نمبر 1 نائب قاصد اور کیتھین چلانے والے ارشد ماما کے متعلق اپنے خیالات کا اظہار کریں۔
 سوال نمبر 2 کیا ارشد ماما کے علاوہ کوئی اور سلازم بھی غلط انسان ہے یا نہیں۔

In reply of such questions almost all the students submitted adverse remarks, even many of the students admitted that Mr. Mian Arshad Khan (N/Q) touches them, but they did not tell anyone, they submitted that Arshad Mama offered and forced the students to enter in his room and he refused to give canteen item outside the room. He always insisted to come inside the dark room. The student were asked that why they did not inform the HM of the school regarding such things?? The students replied that Arshad Mama was the special person of the HM and they were afraid of the strange nature of HM regarding Mian Arshad (N/Q) (Annexure C1, C2-----C11).

As per staff statements (teachers) they did not know about Main Arshad Khan's (N/Q) criminal activities and now after such incident in the school their respective students told a lot about the male staff of the school which are not expressed in words. They came to know about all these shameful activities of Naib Qasid very late. The inquiry committee observed the guilt feeling of the staff and most of them were found weeping after recording their statements, as most of them were also the mothers of young daughters at their homes (Annexure D1, D2-----D16).

"But only one person was not shameful and she was Mst. Ambareen HM of the concerned school. After recording the statements of the staff and students who confess and explain the criminal activities running at school, she asked the committee if Mian Arshad Khan (N/Q) gets released from the jail please allow him to come to our school." These words killed the human behavioral norms and moral dignity of the inquiry committee that she has no concern about dozens of girl's students of the school that what happened to them? How will she face the parents of such victims,

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regarding the evil acts of Mian Arshad Khan (N/Q)? But she was only concerned and anxious about Mian Arshad (N/Q) and her utmost wish was that such person shall be released from Jail by any means. (U) 220

At that moment the inquiry committee felt that the presence of Mst. Ambareen, at GGHS Qasab Khana Peshawar City as head of such institution is very dangerous and in her presence the free and fair inquiry is not possible. Then the committee quickly approached to the Worthy Director E&SED Khyber Pakhtunkhwa and briefed about the current situation, who quickly issued direction to Mst. Samina Ghani DEO (F) Peshawar to place the services of Mst. Ambareen HM at the disposal of Directorate E&SED Khyber Pakhtunkhwa and appointed Mst. Nargis SST (G) as Incharge HM till the arrival of the new HM at GGHS Qasab Khana Peshawar.

The statements of students reflect that all the Class-IV's of the concerned school are involved in criminal activities including Mr. Nasir (Sweeper) and Mr. Nasir Iqbal (J/C) of the concerned school. A few days earlier from such incident some parents came to school and complaint about the criminal behavior of the Nasir Iqbal Clerk of the school. They blamed that Mr. Nasir Iqbal (J/C) showed nude pictures to one of the girl's student, but the HM Mst. Ambareen forwarded such case to Mian Arshad Khan (N/Q) to resolve the issue and who resolved it by his own means. The case was neither reported nor even any action was taken against the concerned Clerk. Mr. Nasir Iqbal (J/C) was called in the office of Mr. Abdul Saeed (Principal) Govt Shaheed Syed Afaq Ahmad High School No.3 Peshawar Cantt who explained all the evils activities running in the school. He explained that such things happened not only in the dark room of Mian Arshad Khan (N/Q) but the HM's office was frequently used for such criminal activities. Because the HM has given her office keys to Mr. Mian Arshad (N/Q) who stayed late in the school premises. He told that all such evil activities usually, happened after school closing as the HM leaves the school one hour before closing time in routine. While all the teaching staff leaves the school quickly soon after school closing.

No staff member was left at school who look after the late going girls waiting in the school and in such duration Mian Arshad Khan (N/Q) does such shameful activities. But when the inquiry committee asked Mr. Nasir Iqbal (J/Clerk) to write such facts in his statement, he refused to do so which means that Mr. Nasir Iqbal is also involved in criminal and evil acts-feeling in danger that if he disclosed the facts in writing then the other Class-IV's will also disclose those facts regarding his criminal activities.

The most important is the statement of school Chowkidar Mr. Wajid Ali, who has been residing in the premises of the school room for the last eight years. He submits that usually Mian Arshad (N/Q) stay in the school till evening, observing suspicious activities which creating routine problems at school. As in the past a girl student complaint about Mian Arshad (N/Q) that he showed nude pictures in his mobile set, but no action was taken by the concerned HM. He submits that he usually use HM office where the girls student stay with him after school timings. He also submits that whenever he saw a criminal activity done by Mian Arshad Khan (N/Q) he advised him not to do such action as his wife and children are residing in such school but he always fought with me. He also submits that he had reported about such criminal events to all the HM including Mst. Neelam Qayyum, Mst. Farzana and present HM Mst. Ambareen. but no action was taken by such Head Mistresses. He also records that all the Class-IV and old staff of the school knows each and every thing regarding Mian Arshad Khan (N/Q) evil attempts (Annexure E1, E2).

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He submits that I am a Chowkidar living in the premises of the school and my duty is to inform the HM of the institution about any illegal activity. Being a poor man I was not able to take enmity with Mian Arshad Khan (N/Q) even all the teaching staff make criminal silence on such activities if action was taken on proper time then such situation would not have happened as today.

VITAL POINTS.

1. Mst. Ambareen the Head Mistress of GGHS Qasab Khana Peshawar has a criminal negligence over the suspicious and evil activities of Mian Arshad Khan (N/Q) and others.
2. Mst. Ambareen the Head Mistress of GGHS Qasab Khana Peshawar trying to dodge and misguide the inquiry committee, hiding facts and saving the accused Mian Arshad Khan (N/Q) from any disciplinary action.
3. Presence of dark rooms in the premises of the girls school where frequent movement of girls was allowed, creating a wide space for male officials of the school for the fulfilment of their evil needs.
4. Autocratic attitude. Creating gap with the students and allowing certain officials as special persons of the Head of the institution results in destruction of human Norms.
5. When the inquiry committee used lenient and sympathetic attitude, the students expressed all their internal catharses in front of the inquiry committee.
6. Allowing canteens, in the girl's school run by male staff results in creating criminal and illegal activities within the girls school.
7. Absent from duties, leaving the school before closing time, creating gap with the staff and adopting monarchy within the school will spoil the peaceful environment of the institution.
8. The behavior and attitude of Mian Arshad Khan (N/Q) spoils the habits of other class-IV's too.
9. The attitude of Mr. Nasir (sweeper) of the concerned school is also quite objectionable.
10. Mr. Nasir Iqbal (J/C) of the concerned school who hid the facts regarding a sensitive inquiry, is also involved in many objectionable, immoral and criminal activities within the institution.
11. Mr. Wajid Ali (Chowkidar) is the only male employee who slightly justified his duty seems raised objections on the evil activities of the male staff at GGHS Qasab Khana Peshawar and reported complaint about the behavior, suspicious and criminal activities to the Head of the institution because of the very fact that his family and daughters are residing in the premises of the same school. He strictly bounded his wife and children not to come out of their quarter due to dangerous and criminal environment of the school.
12. Honest, bold and fair teachers like Mst. Saima Yousaf (CT) are the asset of Elementary and Secondary Education Department KPK and the inquiry committee is fully thankful for his efforts and performance for tracing such black sheep's in the school.


RECOMMENDATIONS.

1. Hira Batool rape case is Sub-juiced in the Court of Law.
2. The appointment order of Mian Arshad (N/Q) may please be verified.

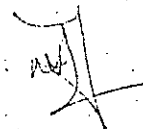
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3. Mian Arshad (N/Q) GGHS Qasab Khana Peshawar may please be dismissed from his service, due to his involvement in criminal and immoral activities with girl's student within the premises of GGHS Qasab Khana Peshawar.
4. Mr. Nasir Iqbal (J/C) GGHS Qasab Khana Peshawar may be removed from service for hiding factual information and involvement in criminal and immoral activities.
5. Mr. Nasir (Sweeper) GGHS Qasab Khana Peshawar may be removed from service as per written complaints from most of the girl's students about his characterless attitude.
6. Mst. Ambardeen HM of GGHS Qasab Khana Peshawar may be proceeded for criminal negligence in his service.
7. An appreciation letter may please be issued in favor of Mst. Saima Yousaf (CT) for her sacrifices and meritorious performance for tracing such evil acts within the institution.

28


 ABDUL SAEED
 PRINCIPAL (BS-19)
 M.Sc, M.Ed, LLB

Govt Shaheed Syed Afaq Ahmad
 High School No.3 Peshawar Cantt


 MST. BIBI TASLEEM
 HEAD MISTRESS (BS-17)
 GGHS Qaidabad Peshawar

High School
 Peshawar
 2022
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17/11/2012

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDUCATION
PESHAWAR

APPOINTMENT:-
Consequent upon the approval of competent authority Mr. Mian Arshad Khan S.O Mian Khadim Shah is hereby appointed in BPS-01 Rs. (4800-150-9300) plus usual allowances on regular basis (Non Pensionable) against the vacant post of Naib Qasid at Government Girls Middle School Gulshan Rahman Colony Peshawar in the following terms & conditions.

Terms & Conditions:-

- 1 He will be governed by such rules and regulation as may be prescribed by the Govt from time to time for category of Govt servants to which they belong
- 2 In case of resignation prior notice of one month should be given by the official concerned otherwise one month pay and allowances will be forfeited in lieu thereof
- 3 His appointment is purely temporary and liable to termination / reverted at any stage without assigning any notice / reason.
- 4 His service will be liable to termination / reversion at any stage if their NIC / Domicile etc. testimonial found fake. FIR will be lodged against the accused.
- 5 He should take over charge of their posts within one month after the issue of this notification / order.
- 6 Charge report should be submitted to all concerned.
- 7 No TA / DA is allowed.
- 8 He will produce health and age certificate from the concerned civil surgeon.

Note:- Charge will not be handed over until the verification of their appointment order.

EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION
PESHAWAR

Encls: No 4106-10

Dated 21/12 /2012.

Copy forwarded for information and necessary action to :-

1. District Accounts Officer Peshawar
2. District Officer (Female) E & S E Peshawar.
3. Head Mistress GGMS Gulshan Rahman Colony Peshawar
4. Supdt. Estab. Local office Peshawar.
5. ADO (Estab.) Secondary Local Office.
6. PA to E D O (E & S) Edu. Peshawar.
7. Official concerned.

[Signature]
DISTRICT OFFICER (MAJ E)
(E & S EDUCATION) PESHAWAR

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

[Handwritten Signature]



Government Higher Secondary School Urmar Bala Peshawar

Email: ghssurmarbala@gmail.com

199

No 410 Date 17-02-



The DFO (F)
Peshawar

Subject: Enquiry Report.

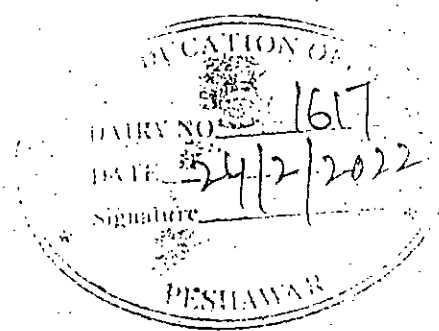
Memo:

Enclosed here is the enquiry report about Mian Arshad (Naib Qasid) and others of GGHS Qasab khana Peshawar. It is submitted for further necessary action please.

Regards.

Professionally
Farzana Jai Sher
Principal GGHS
Chamkani

Farzana Jai Sher
FARZANA JAI SHER
Principal
GGHS Chamkani



Iltiram Khan

Principal GHSS 17/2/2022
Urmar Bala

PRINCIPAL
G.H.S.S. Urmar Bala
Peshawar

Enquiry Report about Mr. Mian Arshad Khan Naib Qasid, Govt; girls High School Qasab Khana Peshawar.

Objectives of the Enquiry:

The competent authority appointed Ms. Farzana Lal Sher Principal GGHS Chamkani, and Mr. Ihtiram Khan Principal GGHS Umar Bala Peshawar to conduct a formal inquiry about Mr. Mian Arshad Khan Naib Qasid, Govt; girls High School Qasab Khana Peshawar regarding complaint/FIR lodged against him in Police Station Yakatoot by one of the parents for raping/sexually harassing her daughter, a student of class 7th GGHS Qasab Khana Peshawar and to submit a report to the competent authority with recommendations.

Problem Review:

As per information from a fact finding enquiry into the matter by Abdul Saeed Principal Government Shaheed Afaq Ahmad high School Cantt Peshawar (Cantt No 3) a student named Hira Batool, the student of class 7th B GGHS Qasab Khana Peshawar whose attendance register record shows her last class attendance on Nov 6th, 2021 and her mother Mst Kalsoom who is also a member of the school Parents Teachers Council, on Nov 10th 2021 called on Mst Ambreen, the school headmistress, and told her that her daughter Hira Batool is not feeling well and that they (her parents) are quiet anxious about her and that they are treating her by a doctor. On Nov 12th 2021 she lodged an FIR in the local Police Station Yakatoot that Mr. Mian Arshad Khan Naib Qasid (who was appointed as Naib Qasid on Feb 22nd 2012 under Office Order No:1106 date 21-2-2012 (Annexure A)) raped her daughter on Nov 6th 2021 in the school canteen (illegally run by Mian Arshad for eight years in a portion of a class room separated by a kachan wall from the rest which was used as clerk office by the junior clerk Mr. Nasir iqbal) after school timing. (Annexure B)

Nov 13th 2021 the local police came to the school with the victim and her parents and arrested the accused Mr. Mian Arshad Khan N/Q of the concerned school. The mother of the victim started beating Raheela, the head girl of class 9th A, shouting that she took her daughter Hira Batool in the room (canteen) of Mian Arshad Khan where the incident took place. The accused was produced before the court of law, who was later on sent to Jail and the case is under trial in the court of law.

202/18

Data collection Tools:

Information received from the fact finding enquiry into the matter by Abdul Saeed Sb Principal GHISS No 3 Cantt Peshawar, Interview, Questionnaire, Openionair, FIR, Observation of the school canteen, class, 7th B, Headmistress Office and the junior clerk office.

Venue

: Government Girls High School Qasab Khana Peshawar.

Date

: Jan/ Feb: 2022

Indicators:

- A detailed interview of the Headmistress GGHS Qasab Khana Peshawar.
- An Interview with written statement of Mst Nargas Parveen SST G GGHS Qasab Khana Peshawar.
- Interview and written statement of Hira Batool and her mother.
- Written Statements and discussion session with the teaching staff
- Written Statements of the students of class 7th B the class fellows of Hira Batool.
- Interview and written statement of Wajid the school chowkidar.
- Inetrview written statement and personal hearing of Nasir Iqbal J/C
- Inetrview written statement and personal hearing of Nasir sweeper.

Method and Procedures:

As the enquiry committee discussed the matter with the DEO (P) Peshawar in detail, getting the full information, added by the enquiry report of Mr. Abdul Saeed Principal Cantt 3. The committee then moved to the school concerned. Mst Farzana Lal Sher principal GGHS Chamkani visited the home of Hira Batool as it was considered by the committee not to call her to the school in this scenario. Hira Batool and her mother were interviewed in detail. And written statement was also taken from Hira Batool (G1). After that the mother of Hira Batool accompanied Mst Farana lal Sher to the school to see the other member (Ihtiram Khan principal GHISS Urmar Bala) of the enquiry committee and to discuss the situation with him. Both the Ladies were accompanied by Mst Saima Yousaf CT. All the three ladies in the presence of the school incharge Mst Nargas Parveen SST G gave detailed information to the enquiry committee. Each and every aspect of the case was discussed in detail. After that the Junior Clerk Mr Nasir Iqbal and Mr.Nasir sweeper were called to the office of HM and were interviewed in details and written statements were also taken from them(H1, H2). Both these fellows were not cooperating. They did not furnish any information. Their behavior and attitude was suspicious, as if they were hiding something. But their

207

statements were matching. It was clear that they had made up their minds not to disclose anything relying just on saying that they knew nothing. The committee in presence of the in charge then visited class 7th B and the place where canteen existed and the clerk's office.

In her statement Hira Batool complained of Raheela, the head girl of class 9th who had taken Hira Batool to the canteen and acted as supplier in this case. This provides a proof that this Mian Arshad had prepared a network for his heinous acts. But this Raheela, we were told, does not respond to any question in this regard and has been guided by her father not to respond to any one in this regard and to ask them to contact her father. We avoided this to keep the matter confined and not to involve others thereby making it further problem for the department. On our return it was recommended to the worthy DEO (F) to immediately ban the junior clerk Nasir Iqbal and Nasir sweeper from the school as their presence is not good in this situation. Later on the committee was called to conduct personal hearing of the two fellows Nasir Iqbal Junior Clerk and Nasir sweeper who had been issued with charge sheets. Both of them were called to the DEO (F) office and were heard in the presence of the office superintendent. But today again their statements were the same not ready at any cost to disclose anything may be because of the fear that if they disclose anything about the situation in the school their own misdeeds will also be disclosed.

Back to the fact finding enquiry report of Saeed sb enquiry who had called this junior clerk Nasir Iqbal to his office GHSS No3 cantt Peshawar where he was questioned about the complaint lodged against him in the school by a family of a primary school students to whom he has shown nude pictures a few months back. On this occasion Nasir Iqbal told Saeed sb that not only Canteen but the school HM office was also frequently used by this Mian Arshad for his heinous activities after school off time. When Saeed sb asked him to give it in written Nasir Iqbal J/C refused asking that by doing so he is endangering his own life and service. But here in front of us he is totally oblivious of these and such other activities thereby proving himself to be a liar and not trustworthy. Furthermore the statements of the students also do not present Mr. Nasir Iqbal to be a man of character.

The statements of the students clearly show that Nasir sweeper has clearly been involved in the immoral activities in the school. His suspicious looks and his suspicious movements is a proof to that or the vice versa. The statements of the students describe him a characterless man.

Wajid chowkidar was also questioned in this regard. He also submitted a written statement. He on a number of occasions raised objections to the activities of Mian Arshad N/Q but could not afford to go further because he probably could not afford enmity with other class IV staff.



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email ID: emispeshawar@gmail.com**

NOTIFICATION:

- 1 **WHEREAS** the Principal Govt. Girls High School Qasab Khana Peshawar has reported that Mr. Mian Arshad S/O Mian Khadim Shah Naib Qasid of GGHS Qasab Khana Peshawar has been arrested by the police on the report / FIR lodged by Mst. Hira Batool Student of class-7th vide No Nil dated 13.11.2021.
- 2 **AND WHEREAS** Mr. Abdul Saeed, Principal, Govt. Shaheed Syed Afaq Ahmad High School No.3 Peshawar Cantt and Mst. Bibi Tasleem Headmistress Govt. Girls High School Quaid Abad Peshawar were appointed as inquiry officers vide this office notification No. 859-63 dated. 13.01.2022 to inquire against the above named official who is involved immoral activities as per FIR and to submit detail report into the matter.
- 3 **AND WHEREAS** the enquiry Officers has submitted enquiry report vide No. 10021 dated 29.11.2021, received to this office vide diary No. 1690 dated. 02.12.2021. The enquiry officers have pointed out that Mr. Nasir Iqbal Junior Clerk Govt. Girls High School Qasab Kana Peshawar has hidden the factual information and involved in immoral and criminal activities and therefore, recommended for Removal from Service.
- 4 **AND WHEREAS** Another formal inquiry was conducted by Mst. Farzana Lal Sher Principal Govt. Girls Higher Secondary School Chmakani & Mr. Ehteram Khan Principal Govt. Higher Secondary School Urmar Bala Peshawar with the direction to submit documentary proofs / clear cut recommendations vide this office Endst No. 30-34 dated. 28.12.2021.
- 5 **AND WHEREAS** He was proceeded against under Khyber Pakhtunkhwa Govt: Servant rules 2011 for the charge leveled by the inquiry officers in their inquiry report and was suspended vide this office Endst No 356-61 dated. 01.01.2022.
- 6 **AND WHEREAS** Charge Sheet was issued to the above named official through Headmistress vide this office Endst No. 376 dated. 01.01.2022.
- 7 **AND WHEREAS** The Inquiry committee has submitted in their report that Mr. Nasir Iqbal, Junior Clerk Govt. Girls High School Qasab Khana Peshawar may be removed from service for being negligent in his duty and indulging in immoral activities.
- 8 **AND WHEREAS** a reply in response of charge sheet received from the official concerned vide Diary No. 2562 Dated: 08.01.2022, which was found unsatisfactory.
- 9 **AND WHEREAS** The competent authority, District Education Officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charge of misconduct / Negligence in duty against the accused has been proved.
- 10 **NOW THEREFORE**, in exercise of the powers under Rules-4(b)iii of Khyber Pakhtunkhwa Government Servants(Efficiency and Discipline Rules 2011, I, Samina Ghani, District Education Officer (Female) Peshawar is pleased to impose major Penalty of "Removal from Service" upon Mr. Nasir Iqbal Junior Clerk Govt. Girls High School Qasab Khana Peshawar with immediate effect.

(SAMINA GHANI)
District Education Officer,
(Female) Peshawar.

Endst: No. 4447-53 Special File GGHS Qasab Khana / Dated: 24 /03/2022

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar..
2. Deputy Commissioner Peshawar.
3. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
4. PS to Secretary, (E&SE) Khyber Pakhtunkhwa, Peshawar.
5. District Monitoring Officer (EMA) Peshawar.
6. Head Mistress GGHS Qasab Khana Peshawar with the remarks to recover any over payment made to the above named Official and deposit in to Govt: Treasury under intimation to this Office.
7. Official concerned.

ole District Education Officer,
(Female) Peshawar

226
195

Findings:

Utilizing the above mentioned tools, methods and procedures the investigators reached at the following findings that;

- Mst Ambareen the HM of the school has committed a negligence in her duty by allowing herself to be guided by this Mian Arshad thereby hiding his evil and heinous activities and using the institution (HM office and its furniture was used by the culprit for his immoral activities after the school time where he forced girls students to stay with him. He has the key of this office. He usually stayed here till evenings) for his vicious acts. With this negligence she became a source of torture and disgrace for respectable families and innocent girls' students and also a source of shame and defame for the whole department.
- She allowed Mian Arshad N/Q to run an illegal Canteen in the school premises which was used for illegal and immoral activities turning it into a dark room. Illegal financial benefits were also gained from it; some of which were even given to her in the form of gifts and takeaway food items in the form of lunch boxes.
- The HM usually left the school an hour earlier encouraging ill-discipline in the school thereby allowing everyone to go for their own mean activities.
- Making Mian Arshad a special man encouraged other male supporting staff to go for their own ill wishes spoiled them and they started taking benefits from this situation in the school.
- The junior Clerk Mr. Nasir Iqbal who has been involved in showing nude pictures to the students on one hand and neglecting his duties on the other hand has not done justice with his position, age and stature. As a clerk he should have warned the HM of the situation or should have reported the situation to the high ups in the district administration. He even tried to mislead the enquiry committees by not providing the facts. It has been a criminal negligence on his part.
- Mr. Nasir the sweeper can be expected ^{to do} anything ~~to do~~ in this situation. He has cashed the situation to his own benefits probab'ly he could not do further otherwise he would have been the worst. Statement of 11 Students highlight the character of Nair Sweeper when he is winking, Staring, Lecherous Smiles, and touching the students. It indicates his poisons nature
- Of all the male supporting staff Mr. Wajid chowkidar is probab'ly the only class IV who has done justice to his duties.

22/5/1999

Conclusions:

The investigators reached at the following conclusions from the above findings that:

- 1. Mst Ambareen the HM has committed a criminal negligence. She has rendered herself unfit for government service.
- 2. Mian Arshad has been guilty of destroying the life of an innocent girl. He has been involved in such activities in a number of cases which remained undisclosed. He also has been involved in unlawfully making money in the school by running an illegal canteen.
- 3. Mr Nasir Iqbal J/C did not leave himself fit for this post.
- 4. Nasir sweeper is not fit to be kept as sweeper after such reports about his character.

Recommendations:

It is recommended that:

- 1. Mst Hira Batool case is being adjudicated in the court of law.
- 2. Mian Arshad N/Q has committed a crime by involving himself in the illegal and immoral activities in the school premises. He may straightaway be dismissed from service.
- 3. Mst Ambareen HM may be proceeded against for criminal negligence in her duty.
- 4. Nasir Iqbal J/C may be removed from service for being negligent in his duty and indulging in immoral activities.
- 5. Mr. Nasir sweeper is not fit for government service because of his characterless nature. He may be removed from service for having bad eyes on the girls' students in the school.

[Signature]
 Principal
 Govt Higher Secondary School
 Umar Bala Peshawar

[Signature]
 PRINCIPAL
 Govt. Girls Higher Secondary School
 School Chankuni Peshawar

TB

Aziz Anwar
Hafiz Rehman

Amman 21

191
(3)

سکول کے نائب قاعد اور ہیڈ ماسٹر کے والد ارشد ماما کے متعلق ایڈووکیٹوں کا اظہار ہے؟

اس کے متعلق ایڈووکیٹوں نے بیٹا قاعد ہیڈ ماسٹر کو نہیں بتایا ہے۔

Head ماسٹر نے کہا ہے کہ میں نے اس کو نہیں بتایا اور اس کی اطلاع اس کے والد کو بھی نہیں دی۔

میں نے اس کے متعلق ایڈووکیٹوں کو اطلاع دینے سے انکار کیا ہے۔

میں نے اس کے متعلق ایڈووکیٹوں کو اطلاع دینے سے انکار کیا ہے۔

میں نے اس کے متعلق ایڈووکیٹوں کو اطلاع دینے سے انکار کیا ہے۔

میں نے اس کے متعلق ایڈووکیٹوں کو اطلاع دینے سے انکار کیا ہے۔

میں نے اس کے متعلق ایڈووکیٹوں کو اطلاع دینے سے انکار کیا ہے۔

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

ST NO: 91
Govt. ...
Quaidabad

1/5/21

(10)

B مسائل

اس 1 اسلولہ نامہ اور لیشن چلانے والے ارشد ماسٹر

متعلقہ اظہار ہیں

ارجا اس نے اس صیغہ ساتھ دوستی کرو۔

اس 2 ارشد یہ کوئی اور ملازم بھی غلط انسان ہے دن کون ہے وجہ لکھیں

ارجا 3 یہاں بھی فائل کلاس میں نام ماسٹر تھا اور اس کو آگہ بھی ماری تھی۔

HEAD MISTRESS
G. G. H. S.
QUAIDABAD

نساء لوینہ

7th B

3 C 19

میں نے سکول کے نائب فاضل اور کینیڈین چلانے والے اسٹر ماما
 کے متعلق اپنے خیالات کا اظہار کر دیا ؟
 [ج] سر جے ایم 10:05 پر چھی بیوتی تھی تو میں اپنی کزن کے
 لئے روکتی تو اس نے مجھ سے پوچھا کہ کیا کر رہی ہوں
 تو میں نے جواب دیا کہ میں اپنے کزن کے لئے بیٹی ہوں
 کزن کے پیر ہی اس کی 12 بجے چھی بیوتی تھی میں ناصرہ نے
 ماما سے بیڑی منگوائی تو جب وہ اس ناصرہ کو بیڑی دے
 لیاں بیٹھا تو وہ اس سے ماما کینیڈین کے پاس گئے اور میرے
 لئے بسکٹ لاک پر میں نے واپس کر دینے تو اس نے مجھے کہا
 کہ میں تم سے ففا ہوا ہوا گا تو میں نے بسکٹ لاک لیا
 اور اس کو پس دینے کہ یہ لو میں کسی سے بیوتی
 بغیر چیزیں نہیں لیتی -

ش ناصرہ ماما -

اس ہاروں آگے اور خود سے بیٹے
 اللہ صفائی لیں کرنا تھا جتنی لڑکیوں کو دیکھتا
 تھا سر اللہوں میں لڑکیوں ڈکٹر نور تھا

HEAD MISTRESS
 G. G. H. S.
 JAIDABAD

Amal

Class: 13B

Date: 17th Nov/2021 Cow Name: Ramiya Aslam

س 1 سکول کے نائب قائد اور لپٹی چلانے والے ارشد

ملا کے مشق اپنے قبالات کا اظہار کریں۔

ج وہ بہت طیش کرتے تھے۔ لڑکیوں کو یا تو پکرتے تھے۔

لڑکیوں کو لڑکیوں کو قرفی دیتا تھا۔

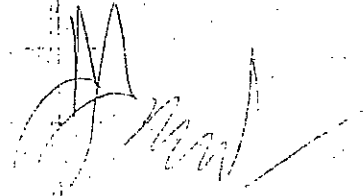
اور لڑکیوں کو عجیب نظر سے دیکھتا تھا۔

س 2 کیا ارشد ہمارے علاوہ کوئی اور صلاحتی عطا ہوا

ہے یا نہیں؟ اگر ہاں تو کون کون ہیں اور وہ کیسے ہیں؟

ج سر افسر ہمارے عجیب نظروں سے دیکھتا ہے اور صورت

دیکھتا ہے۔



HEAD MISTRESS
G.G.H.S.
QUAIDABAD

(33) C5

سجید عبدالرحمن اہل بیتؑ

س۔۔۔ سکول کے نائب قاض اور کنیٹن چلانے والے
ارث و ماما کے تعلق اپنے خیالات کا اظہار کریں؟

ح۔۔۔ ارشاد عاقلانہ ہے اور انسان فقہ ۵۹ لکھنؤ
کے سابقہ ایڈیٹر کرتے تھے اللہ تعالیٰ اس کو
کچھ عفو عنہ کرے۔

س۔۔۔ کیا ارث و ماما کے علاوہ کوئی اور ملازم یعنی
غلام انسان سے زیادہ پیارے ہو گئے ہیں تو کون کون سے
اور وجہ لکھیں؟

ح۔۔۔ ۵۹ لکھنؤ کو عجب نظر سے دیکھتا ہے نام
ماما پر یعنی غلام انسان سے۔

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

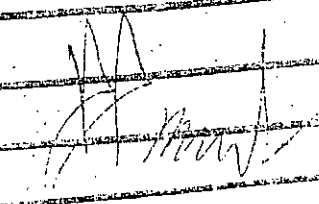
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M
GENERAL
G.G.H.S.
QUAIDABAD

Class: 7th B

Muskan Hashmi

میں اسکول میں اپنا ایک اہم کام ہے اور یہ پیشہ ورانہ ہے اور اس کا
 یہ کام ہے کہ اس کے خیالات کا اظہار کرے اور اسے
 اور اس کے خیالات کو عجیب نظر سے دیکھتا ہے۔ اس کا کام ہے
 کہ اس کا یہ خیال ہے کہ اس کا یہ خیال ہے کہ اس کا یہ خیال ہے
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HEAD MISTRESS
 G. G. H. S.
 QUADABAD

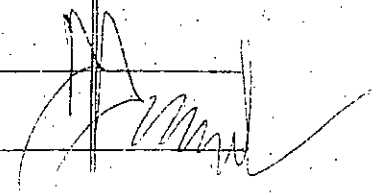


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(31)

Date: _____ 7th (B) حر اسالار

<p>سکول کے نائب، قاض اور کیشن (چلانے والے ارشد</p>	<p>سری</p>
<p>ماما کے متعلق اپنے خیالات، ملاحظیات کریں،</p>	
<p>وہ ہیں، پیش کرتے ہیں۔ لڑکیوں کی حالتیں بہتر تھیں</p>	<p>ج</p>
<p>سر جی بلیک، سوئی تھی، وہ لڑکیوں کو قرض دیتے ہیں</p>	
<p>دیوانہ۔ اور لڑکیوں کو عجیب، نظر سے دیکھتا تھا۔</p>	
<p>آپا اسڈر ماما کے علاوہ کوئی اور ملازم نہیں ہے، ماما</p>	<p>ج</p>
<p>پیل یا لہیرا، آپ میں لگو لگو کون ہیں اور جب کہیں</p>	
<p>سر جی بلیک، عجیب، نظر سے دیکھتا ہے اور</p>	<p>ج</p>
<p>تینا ہے۔</p>	
<p></p>	<p>سری</p>
<p></p>	
<p></p>	

HEAD MISTRESS
G.G.H.S.
QUAIDABAD



PRINCIPAL
Govt. High School, Quaidabad

۲۱۳

FIZA Batool.

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س اسکول کے ٹیچر اور اس کے والدین کے
ادب و احترام کے متعلق اپنے خیالات کا اظہار
کریں؟

۶

ادب و احترام گننے یا پراپر Pepsy
پہننا ایسے اداروں کے لڑکیوں کو عجیب
لگتا ہے دیکھنا ایسے اداروں کو بہت تیار ہے
کرتا ہے اور لڑکیوں کو ایسے لگاتا ہے اور
وہ لڑکیوں کو بہت ایسے لگاتا ہے ایک لڑکی
کے والدین اور

ایسے اداروں کے علاوہ کوئی اور
ملازمہ بھی غلط انسان ہے ہم نہیں
اگر یہ لڑکیوں کو لگا رہے ہیں اور وہ
کھینچا

ہی ہاں! میں
ماہر ماہر افراد لگاتا ہے تو
لڑکیوں کو لگا کر بہت ایسے

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

Govt. G.H.S.
High School

C11
4/191

نام: 'فریم احمد'

سکرٹری کے نائب نامید اور کینٹین چلانے والے ارشد ماما کے متعلق
اپنے خیالات کا اظہار کریں۔

جواب: لڑکیوں کو ارشد ماما فری جینز دیتا تھا،
اور انہیں کہتا تھا کہ جو لڑکی جینز لے رہی ہے وہی صرف
اٹلے اندر آئے۔

لڑکیوں کے ساتھ کلب شب لگانا تھا،
پیسوں کے بہانے لڑکیوں کے ہاتھ پکڑتا تھا۔

کہا کہ ارشد ماما کے علاوہ کوئی اور ملازم یعنی غلط انسان نہیں
پائیں۔ ایسے لڑکوں کو روکنا ہے اور ہم بکس؟

جواب: نامہ راجا بہت ہی تہمتیں لے اور ایک دن اس نے کوئی عجیب
حرکت کر لی۔

جا بڑی لڑکیوں کو بہت عجیب اور گھٹئی نظروں سے دیکھتا
ہے۔

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

Handwritten signature
OFFICIAL
Stamp

Class: 7th B

Date: 17 Nov 2021

Monday

Mehak Rashid Hussain

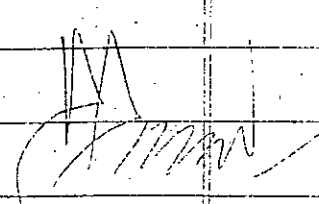
س ۱ اسکول کتابت قاعد اور کتبش چلانے والے ارشد عام کے متعلق اپنے خیالات کا اظہار کریں؟

۶۰ ارشد عام لڑکوں کو ملنے کی عمر سے پہلے تھے ارشد عام سے دیکھتے وقت پانچویں تھا۔
تجاویز میں قیاس کرتے تھے جب ایک لڑکے کو قتل کر لیا تو قتل میں چھپیں دینا تھا۔

س ۲ ارشد عام کے حدود کوئی اور حد ہے غلط انسان میں یا نہیں اگر میں تو لوں
لڑکی اور وہ نہیں؟

ج ۲: نام ماہاجب بیان ہوا تو وہاں پہلے لڑکوں کو لیکر پھینکا ہے

HEAD MISTRESS
C.G.H.S.
QUAIDABAD



104 Samag
Quaidabad

Annexure D1

میں ٹرکس میں (9) 581

(25) 16

میں میں ٹرکس اللہ تعالیٰ کو حاضر دنا پھر جان کر
 یہ بیان لکھتے ہوں۔ کہ میں نے کینٹین چلانے والے
 آدمی (class) جس کا نام ارشد ہے، کو بذات خود
 اپنی آنکھوں سے گونا گویا حرکت کرتے ہوئے دیکھا تھا۔ البتہ
 یہ حادثہ ہونے کا لیدر جب Student نے اپنی اپنی باتیں
 بتائیں۔ تو انتہائی افسوس ہوا۔ کہ اسے کاش میں کچھ
 بھی سچو سچو ہوتے تو اتنا بڑا واقعہ نہ ہوتا۔ Student
 نے یہ بتایا کہ بریک ٹیم میں کینٹین سے سامان لےتے
 وقت اکثر بڑوں کے ہاتھ لگتا تھا۔ اور کچھ نہ
 کچھ کچھ دیتا۔ لیکن یہ باتیں یہ روئیاں ہمیں اب بتا رہی ہیں
 اس طرح Student نے یہ بتایا۔ کہ ایک دفعہ ارشد
 نے مجھے دیکھی تاکہ لکھنے کو کیا تھا۔ لیکن میں اس دن
 ڈر کر علی صلی گئی تھی۔

ہاں جو بھی ہوا انتہائی غلط ہوا۔ جس کا نام آذالہ

تھا۔ لیکن ہے۔ گزرتا ہے۔ کہ کینٹین کو فوراً بند کر دینا
 کہ وہ بند ہے۔

(ST-IT) 18/11/2021 (Gida Ambreen)

جل میں C-Leave پر تھی کیونکہ میرا Ability Test تو میرا بیان نہیں دیا گیا۔ آج مجھے بتا کر (Statement) لینی ضروری ہے۔

مجھے سمجھ نہیں آ رہی کہ کیا لکھوں سکول کے ٹائٹل کا بعد میں (از شدت) کے بارے میں کیونکہ ہم اسے ایسا بالکل کوی نہیں سمجھتے تھے تمام سٹاف (مختص) کے ساتھ انفارمیشن فراہم کیا تھا۔ کوی کوئی ایسی دلچسپی ضرورت نہیں دیکھی ہم نے سوائے ایک واقعہ کے جو میں بیان کرنا ضروری سمجھتی ہوں۔ میں 2017 میں نئی Appointment ہوئی تھی تو دن دن Faizana Asbati Head تھی، انکی انچارج میں بیٹا نے مجھے office میں دکھایا کہ دیکھو یہ لڑکی تمہیں کیسی لگی ہے تمہیں کیسی ہوئی (Nature) تو میں بتا کر لڑکی اچھی اور خاتون کی تھی (اسکا نام بلوشتہ تھا اور وہ) ~~میں~~ لڑکی لگی (بلوشتہ) نے پھر کہا کہ دیکھو یہ لڑکی ہے تو وہ office کے باہر لے گئے تھے (بانی) سے آئی اور (از شدت) سے بتا کر کہہ گئی، تو بلوشتہ نے Smile دی اسے اور ہاتھ ہلانے سے پہلے کہا *was shocked*۔ پھر میں نے اسے آواز دے کر ڈانٹا اور وہاں سے بھاگا۔ یہ سب ہم نے office کی کھڑکی سے دیکھا۔ پھر اسی کھڑکی سے اسکی اطلاع ملی پھر نے کچھ عرصہ بعد مختلف خائفانہ طریقے جو وہ اس ٹائٹل کا بعد میں (از شدت) نے لائی گئی۔ پھر کھڑکی سے اطلاع دی گئی (اس سب کئی اور والدہ نے بہت برا بھلا کہا لڑکی کو۔ تو (از شدت) خائف و غمگین رہتا تھا، تمام *at class* کے دوران لڑکی *well dressed* اور *presentable* آتا تھا۔

میں نے اسے کبھی کبھو اور دیکھنے یا سمجھنے میں نہیں آیا۔ دنوں جس دن صراحتوں اور انکی والدہ سکول آئی تو تب کبھی کبھی کے وقت کچھ باتیں سننے میں نے، اس سے پہلے تب یہی کہا تھا کہ *head of* نے ڈانٹا کھڑکی سے والدہ کو نہیں بدلتی آتی ہے۔

HEAD
MISTRESS
CHAIRPERSON

میری التجا ہے کہ میان اور میری یہ الزام ثابت ہو جائے تو اسے دو بارہ نہیں بھی *female* سکول میں نہ کھینچا جائے کیونکہ میری الزام توئی (صغیر) الزام نہیں۔ ہم میں سے کسی نے اسے سکول میں نہ لایا ہے۔ *Swaper* نامہ خاتون کبھی یہ کہے کسی شہید و شہداء کے بارے میں *office* میں بطور منبر بھیجا گیا تھا، پھر دوبارہ

PRINCIPAL
Govt. Girls' School Qasab
Peshawar

(22)

میں سہمی جہاں تک بطور سہمی بی بی کے لئے اور سہمی بی بی کے لئے
گزارہائی سکول قعات خانہ میں اگست 2019 سے
اپنے فریقین سہراخانہ سے رہی ہوں۔

سیار ارشد نائب قاعد کو میں سکول کے حادثہ
حالی ہوں۔ ان دو سالوں میں سہرا خانہ میں
ان سے واسطہ لڑا ارشد نے بہت اچھے انداز میں
جواب دیا۔ کبھی نظر اٹھا کے دیکھا بھی نہیں اور لڑ
ہی میں ہر ان دو سالوں میں انکو کسی غلط حرکت
پر دیکھ چکی ہوں۔ مگر اس واقعہ کے بعد

یعنی (22) کو سہرا خانہ 2021 کے بعد جب مختلف کلاسز
میں بچوں سے پوچھا تو سہرا خانہ میں انکسٹان
سازنے آئیں۔ ایک بچی نے کہا کہ ارشد ماما
میں سہمی چیزیں لے گئے تھے تو یہ سہرا خانہ
دیکھنا تھا۔ ایک بچی نے کہا کہ میں سہمی بچی کے پاس
بہت سی لوائے ہیں ارشد ماما نے کہا کہ خود دیکھو
تو تب چیزیں دوئے ورنہ نہیں اور سہرا خانہ میں نہ بھی لیا
مگر بہت تعجب و رنج ہے جس نے ناراض کر دیا۔

17-11-21

CHANGIZ AHMAD
1998

1. سکول میں کینٹین چل رہی تھی ارشد کینٹین چلا رہا تھا
 2. اس سے پہلے جو انکوائری کی گئی تھی ان کے جانے کے بعد سڈروم نے کینٹین بند کر دی تھی۔ آرڈرنگ
 3. پر لکھوا کر لگن اس کے باوجود ہی کینٹین بند نہیں ہوئی اور ارشد 12/11 تک کینٹین چلا رہا تھا۔
 4. کینٹین چونکہ چھپ چھپ کر چل رہی تھی اس لئے ارشد نے کہا کہ ایک تھی سب بچیوں سے یہ سبے آگے کر کے لئے اور پورا بیکٹ لے کر جانے۔
 5. اعلیٰ سائڈ پر جو سٹاف روم ہے اس کے سائڈ روم میں ہی مارشنگ کر کے کینٹین بنائی گئی ہے۔
 6. ارشد کو سامنے یہ سب سے آگے نہیں کر کے بات کرنا تھا۔
 7. اگر کینٹین نہ ہو تو یہ واقعہ پیش نہ آتا۔
 8. کینٹین اگر حکومت کی طرف سے بند تھی تو بند ہی ہو جاتی جیسے تھی عہد کو کینٹین چلانے کی اجازت ملتی اور اگر چلائی تھی تو کوئی ختم رکھ لیں
- 7/11 فلاس کی بجلی نے کہا پھر سے کمر میں نہ جانے کھانے کے ساتھ آئی تھی تو ارشد نے مجھے کہا کہ یہ کون ہے اور تم اس کو لفت دے رہی ہو مجھے تو کہیں لفت نہیں

وزیر ناظم
CT

PERSONAL
Genl. Secy. to Govt. of Punjab
High School, Lahore, Pakistan

HEAD MISTRESS
G. G. H. S.
QUAIDABAD

میرانا چند اولاد محمد جاوید میں بیان قصاب خانہ بانی سکول میں۔ جب 3 ماہ سے سس۔ ٹی ایسٹ پر ٹرانسفر ہو کر آئی تھیں۔ میں جب بیان آئی تو کینٹین چل رہی تھی اور یہ سلسلہ صبح سے لے کر چھٹی تک چلتا رہتا ہے۔ سکول کے مین لیٹ کے سامنے کینٹین ہے اور لڑکیاں وہاں جا کر چینی پل خریدتی۔

جب یہ واقعہ رپورٹ ہوئی 12/11/2021 سے کینٹین مکمل بند ہے۔ میں نے لڑکیوں سے پوچھا تو سب نے ایک جیسی باتیں بتائی کہ ارشد اچھا انسان نہیں تھا وہ لڑکیوں کے باہق پلٹر ٹاٹھا اور گندی باتیں کہتا تھا کہ (شندونہ دے نارشم، قربان شمس) اس سے پہلے بتایا ہے کہ ارشد نڈر تھا اور اسکو خوف نہیں تھا وہ عادی تھا۔

اگر کینٹین نہ چلنی تو یہ مسائل نہ ہوتے کیونکہ صبح سے پہلے سب سے چل رہا ہے ارشد تو سب سے ملے سے بیان ڈیوٹی سرانجام دے رہا ہے۔ بیان کی لڑکیاں پہلے سے جاتی تھی ارشد کے پاس چینی پلٹ لیتے۔ صبح تو لڑکیوں سے بھی پتا چلا کہ ارشد اچھا انسان نہیں تھا۔ مین سٹاف کے ساتھ ارشد کاروبار انتہائی شرمیلانہ تھا کبھی آنکھ اٹھا کر بات نہ کرتی۔

میں نے اس کے ساتھ بچوں کے ساتھ زیادتی ہوئی ہے اور سب سے بڑا ہوا۔ اگر ارشد ذمہ دار ہے تو اسے بیان اس سکول میں سب کے سامنے بھاگنے دیا جائے۔

بیان کے sweeper کے متعلق بھی باتیں مشہور تھی کہ وہ اچھا نہیں تھا اسکو بھی دو سال office میں رکھا کر واپس اس سکول میں بھیج دیا۔ صبح بیان کو پیر کے سٹاف نے بتایا ہے۔

غلام حسن
17/11/2021

نوٹ (بھاری میڈم نے ارشد کو پرہیز
کا بڑا بتایا ہوا تھا۔ ان 3 ماہ میں
کوئی بھی پیشکش نہیں کی جو بھی لگا رہی
چاہے لڑکیوں کا یا سٹاف کا تو میڈم نہیں
آتی ارشد کے پاس جاؤ)

HEAD MISTRESS
G.G.H.S.
QUAIDABAD

PRINCIPAL
Govt. High School Quaidabad

(18)

- 7) بچوں کے مطابق ارشد ماما انکو پینڈیز میں دیتے ہوئے touch کرتا تھا۔
- 8) وہ انکو سویاٹل فون office کرتا تھا۔

In simple words the link between the students & Arshad has been developed because of canteen which is the hub.

9) اور Mham نے staff کے ساتھ بہت Gap رکھا ہوا ہے ہم صرف کام کی بات کے لئے ہی office کا رخ کرتے ہیں اور اس سکول میں ٹیچر کی عزت بالکل تھی نہیں۔ اسی وقت Recently کسی ایک ^(Saima) ^(Sobina) ^(Sobina) سے عزت کیا گیا جس کی Inquiry تھی چل رہی تھی۔

10) مہربانی کرنے پر انگریزی سکول کو یاٹی سکول سے الگ کیا جائے ان کی بچیاں ہمارے سکول میں، واش روم میں گھوم رہی ہوتی ہیں۔ انہی رکن ہی ہوتی ہے اور دوسرا انکا سکول بھی ملتا شروع ہوتا ہے اور شخص جلد ہی ہوتی ہے تو ہم لوگوں First اور Last پیریڈ میں بالکل نہیں بٹھا سکے اسے شہر کی وجہ سے۔

11) وہ اور کوشش والا راستہ بند کر دیا جائے اور بچوں کے لئے صرف 1 واش روم ہے۔ 600 بچوں کے لئے صرف functional washroom مہربانی کرنے اس مسئلے کو بھی حل کیا جائے۔

12) سخت سردی میں بچے کھینچ جٹا بنوں اور ٹوٹے ہوئے فرش پر بیٹھتے ہیں۔

13) اور Plaza میں ایک خانہ ہمیں Provide کر دیں۔

آج سرین بھی خود دھو رہے ہوتے ہیں سٹاف روم بھی خود دھو کر کرتے ہیں۔ جو attendant لگا (تاک) موجود ہیں وہ سارا دن صرف Madam کے آنس کے باہر بیٹھی رہتی ہیں اور ہماری بالکل کام نہیں کرتیں۔

Arshad
Sobina
Sobina

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

میرا نام صائمہ پوسف ہے، میں پچھلے ڈیڑھ سال سے
C.T پوسٹ پر ہیاں ہوں۔

اور میں یہ اسٹیٹنٹ اللہ اور اُس کے رسول کو حاضر نام
جان کر یہ حلفیہ بیان کر رہی ہوں کہ اس سکول یعنی
گورنمنٹ ہائی سکول خضاب خانہ کے حالات بالکل ٹھیک
ہیں ہیں، کیونکہ سکول کی ہیڈ ماسٹر ایس ایمس بناری کو سکول
سے زیارہ اپنی دوکانداری کی زیارہ نکر ہوئی تھی۔ کلاس
فور ملاد میں کو سسر پر بٹھایا ہوا تھا کہ وہ ارشد
رس کے بے کنسین جلاتا تھا۔ اور جب یہ کہا منٹ لے لے
سکول سے چلی جاتی تھی تو اسے رشتے میں بٹھا کر سائی میں
گمانے بننے کی چیزیں بھی دیکر رخصت کرنا تھا۔ ارشد علی
بیان کا سوئیر بھی لبت ہی ذلیل اور کینہ انسان ہے۔
اس ڈیڑھ سال میں اسے کلاسوں کی صفائی لینا ہی
میں نے بار بار میڈم کے نوٹس میں یہ بات مدنی سنیں
وہ ہمیشہ کہتی تھیں کہ یہ نوٹس ہی (kash) نہ لے لے۔
میں نے ہم وقت نشوونما مدنی رہی تھی کہ یہ کیوں اللہ
سورٹ کرتی ہے۔

بچیلے میں بھی میں نے سنیلری ادب کو کینٹی کو ایسا کسروہی
 شکایت نام لکھا کہ میں محمد بن بخاری کینٹی جلائی وہ
 صبح لیٹ اور واپسی میں جلہری چلی جائے تھیں
 بچوں سے دوسری ماسک ارشتر سے یہ خبر پڑی اور
 صبح صبح بچوں سے 10، 10 روپے فائس لیں۔
 سب سے ایچ اور خانک باک جو ہمیشہ سے مجھے کھنڈ
 کہتی کہ ارشد صبح سے پیرہ چھٹی ہونے تک کینٹی جلائی
 اور چھوٹی چھوٹی بچیاں سمیت بڑی بھڑا بچیاں بھی اس
 کے زور پر یا گری ہوئی تھیں۔ بعد میں دوکاندار ہی کرتا تھا
 20/11-6 کو جو کہتے ہیں کہ کرائش واقعہ اور ظلم ہوا
 ہوا ہوں جیسا کہ جو کہ ہم سب کے لیے بنائے تھے
 بات ہے، اور اگر بچاں ہمیں زور ہوئے تو ہم اس
 بچے کے اظہار کے لیے آفری حد تک جائیں گے۔
 پھر بھی ستر یہ ہی کیونگی کہ پیرہ صبریں اور اگر اپنا
 ٹھیک ہوئیں تو کینٹی ہی نہ چلتی اور اگر کینٹی بند
 ہوئی تو یہ واقعہ بھی پیش نہ آتا، اور پھر کینٹی
 کو زور نہ جائے۔

(15)

کہ تو مہم کے واقعہ کے بعد تو چاہیے تھا کہ کینیڈا میں مکمل بند ہو جائے
 لیکن اس کے باوجود جب تک حملہ 20/11/12 تک جاتا رہا
 تاکہ سائنس نہ آئی اس وقت تک کینیڈا جاری تھی اور
 جب ارشد پکڑا گیا تو پھر 20/11/13 سے کینیڈا میں بند ہو گیا
 ستر میں نے ہی آجاکو سب سے پہلے یہ سارے واقعات بتائے جسکی
 وجہ سے میڈیا نے پھر خلاف رواری سکول میں پروٹیسٹ شروع کیا
 کر لیا گیا کہ میں صائمہ کی وجہ سے آپ سب کے گارڈن میں
 تیار ہو جائیں گے۔ اور سب کی سبک دہی ہو جائیگی وغیرہ
 وغیرہ۔ ڈیڑھ دو سال میں میڈیا نے کئی کوئی فیٹنگ لیا
 رکھی۔ اتنی بے رحمانی، گندی زبان اور گھنٹی کی عورت
 ہیں۔ 15/10/2016 کو ان کی ریکورڈری ہوئی تھی۔ اسی
 وقت اس ریکورڈری کی رپورٹ کانسی سے مہاجرین آیا
 آسن میں یہ نہیں ان کے کہنے کے ساتھ ساتھ لگا کے یہاں
 کہ آسن کے اندر کے معاملات اور رپورٹس پہلے سے ہی
 میل جاتی ہیں۔ یہ پیکر کو کھڑے کھڑے اس اند
 لہنی گندی گلابیاں یعنی کچھ اصل کی تھی۔ ردیل کی تھی
 نسبت کی تھی جسے نازیباں کو استعمال کیے

سید (14)

یہ ہی آپ سے یہ التماس ہے کہ سسر پلینر اس عورت یعنی
محمد بن محمد بخاری اور انکا ^{راجلد} محمد (میں شیدا) اور کلا سے
فور کو فی الفور بیان سے ہٹایا جائے تاکہ سکول پر ہم
کے گند سے پاک ہو جائے۔

بروز منگل 2021/11/16 کو میں ٹینہ اختر کے تمام کلاسز
کی ٹریڈنگ سے بوجھد کچھ کی تو سب یہ شہر مناک واقعات
سنانے آئے۔

محمد بن کے یہ دو غیر کام کے بیچے انکی ایجارج میں
شیدا ہوتی ہیں۔ جب یہ غیر حاضر ہوتی ہیں تو پورے میں
کہتی ہیں کہ یہ Rule ہے کہ میں م کی C.Leave لینا گئی۔ بد
ترکی حاضری لگائی جاتی ہے۔

فل زخمی زخمی ہے سسر پلینر القاض کریں۔

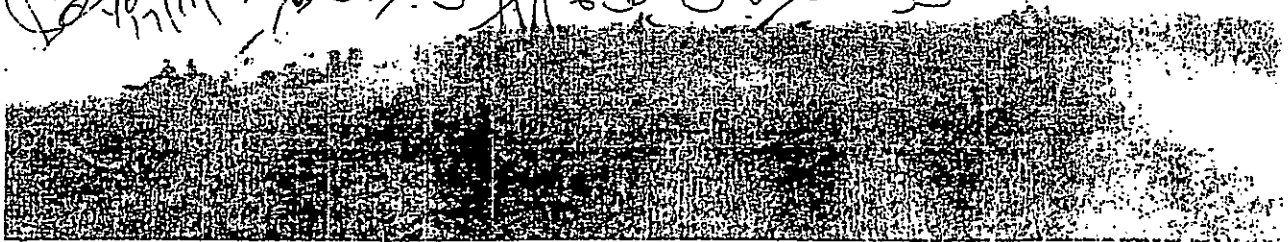
فرشتے سے لپٹتے انسان بنا

مگر اس میں لپٹی ہے صحت و بارہ

گروہ میں باقی تمام ریل زمین پر

عدا سبزیان بونگہ ہر شے ہر شے

YOUCEF
17/11/2021



Annexure E1

تاریخ: _____ دن: _____

108

ک	<p>آپ کا کہنا کہ داد و درمقا کہ توفیق اور آپ اس سکول میں کیا خدمات سرائی کر رہے ہیں۔</p>
ط	<p>حضرت صاحب، آنسو پڑی اور فیس و سب سبزی نامہ واحد علی ولد شاہ سیدتہ جس کو گورنمنٹ پرائمری سکول سرائی میں چھوڑا ہوا دعوت اور میری ڈیوٹی نامہ پانچ سے پنج 8 بجے تک سونے ہے اور میں اس سکول میں 2013 سے خدمات سر انجام دے رہا ہوں۔</p>
س	<p>آپ میں ارشدانہ قاصد کی مجلسوں کے ساتھ زیادتی یا ان کے لئے کوئی متعلق جو کچھ جاننے میں۔ بیان کریں۔</p>
ط	<p>حاضر حال میں میں ارشد کو 2013 سے جانتا ہوں کیونکہ میں 2013 میں اس سکول میں آیا ہوں۔ 2013 سے آج تک اس سکول میں ہوتا تھا اور اس کے ساتھ ساتھ تھے چند بار سے میں بھی تشریف لگتی تھیں میں چونکہ خود چھوڑا ہوا دعوت اور میری بار سے اس کو تری گئی دفعہ دفعہ اسکو سبھا یا بلنگی ہو چکی تھی۔ اس کو تری غیر متعلقہ لوگ اسے یا اس کے لئے تھے اس لئے میں اس طرحی نے شکایت کی تھی کہ اس نے مجھے جوائن نہیں کی تھی۔ یہاں تک میں قیوم کے وقت میں پانچ کا 15 بجے آیا تھی جس سے اس کا پتہ پڑ گیا اور اس نے کہا کہ یہ لوگ DM مشیر کے ہیں۔ کیونکہ یہ خود اس کے</p>

MAHARAJA PRESS
DUBLIN, IRELAND

ہر کام کرتا تھا، حتیٰ و بعد سے آکر اڑیاں اس کے پاس
 آتی تھی، جن کے پاس یہ کہی میڈم کے دفتر میں اور
 کہی آئے تھے۔ مگر وہ میں سے 10 دن سے بیٹھا تھا کہی
 سولہ کی لڑکیاں کہی لڑکی تھی کیونکہ میرا سامنے دکان
 تھی اور میں چھوٹی تھی وہ بڑی فٹ کھد کول
 آتا ہے اور ایرا کوٹھہ واقعہ دیکھتا تو ارشد کو سمجھاتا
 کہی کہ یہ کام نہ کرو کیونکہ اس کول کے اندر میرا گھر ہے
 اور اس میں عزت و حریم ہوتا ہے اللہ وہ اٹھا
 سے بھڑکتا تھا۔

بہا آپ نے کہی H.M کو ان باتوں کے شکایت
 تھی، اور ایجنوں نے کیا Action یا
 سی میں نے اسے خود میڈم سے کہی کہ اور میڈم
 پریشانہ کو اور خود میڈم نے بھی شکایت کی تھی کہ
 یہ لوگ میرے لڑکیوں کول میں لگتی ہیں
 لیکن ایجنوں نے کوئی Action نہیں کیا

اگر دفعہ سمجھایا کہ اسے آگے نہ لے کر ان کاموں
 سے بچا جائے تو میں وہ نہیں مانا۔

سزا دینے کا اس سے پہلے کہی کول میں ارشد کے تعلق کوئی
 شکایت سمجھائی تھی
 جہاں سے میں تو چونکہ دن کے وقت کول میں
 ہوتی ہوتی اسے شکایت کہی پہلے تو وہ وہ میں
 اور میرا نہ کر چکا ہوں۔

22/11/2021

HEAD MISTRESS
 S.C. COLLEGE
 JALDAGAN

تاریخ:

دن:

جاتا تو آج یہ برنامہ ہماری سکول کے ریفورم
جب جب سکول میں وقف مرد اشخاص کے ہوتے
بچوں کو والدین سے ملنے کیلئے آتے تو جی آر شد ان
کو بھی پڑاتا تھا۔

اساتذہ کی ہر ماہیہ انعاموں کے
میں سے جو پورا عرض تھا وہ آجاتا تھا
کاروائی ان لوگوں کی طرف سے ہوتی ہے جو
اس پر چاہتے ہیں اور گناہ کو چھیننے کے موقع
فراموش کیا

واحد علی چوہدری

G. G. S. Sarki Gata, Faisalabad

موجودہ نذر قلم پرانا قلم خانہ

22/11/2021

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654 Shikoh
High School No. 1

HEAD MISTRESS
G. G. S.
QUADABAD

19

7) بچوں کے مطابق ارشد ماما انکو چمکیز ہیں دیتے ہوئے
 touch کرتا تھا۔
 8) وہ انکو موبائل فون سے offer کرتا تھا۔

In simple words - the link between the students & Arshed has been developed because of canteen which is the hub.

9) اور Maman نے staff کے ساتھ بہت Gap رکھا
 ہوا ہے ہم صرف کام کی بات کے لئے ہی
 office کا رخ کرتے ہیں اور اس سکول میں
 ٹیچر کی عزت بالکل تھی نہیں۔ اسی Recently
 تھی ایک سینیئر (Senior) سٹیپنڈی (Stipend) میں بے عزت کیا گیا جس
 کی Inquiry بھی چل رہی تھی۔

10) مہربانی کرنے پر ہمیں سکول کو بائی سکول سے الگ کیا
 جائے ان کی بچیاں ہمارے سکول میں، واش روم
 میں گھوم رہی ہوتی ہیں۔ انہی رکن نئی ہوتی ہے
 اور دوسرا انکا سکول بھی تھا شروع ہوتا ہے
 اور پختہ جلدی ہوتی ہے تو ہم گھولوں First
 اور Last سیریز میں بالکل نہیں بٹھا سکتے اسے
 شروع کی وجہ سے۔

11) وہ اور کپٹین والا راستہ بند کر دیا جائے اور
 بچوں کے لئے صرف 1 واش روم ہے۔ 600 بچوں
 کے لئے صرف functional washroom مہربانی کر کے اس
 مسئلے کو بھی حل کیا جائے۔
 12) سخت سردی میں بچے کھینچ جٹا بیٹوں اور ٹوٹے
 ہوئے فرش پر بیٹھتے ہیں۔

13) اور 240 ایک خانہ ہمیں Provide کر دیں
 آؤ سرین بھی خود دھو رہے ہوتے ہیں سٹاف روم تھی
 خود دھو کر رہے ہیں۔ جو attendant کلاس موجود ہیں
 وہ سارا دن صرف Madam کے آفس کے باہر بیٹھی
 رہتی ہیں اور ہمارا بالکل کام نہیں کرتیں۔

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بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ ط

(17)

عبر نام صائمہ یوسف ہے، میں مجھے ڈیڑھ سال سے
C.T یوسٹ پر بیان ہوں۔

اور میں یہ اسٹیٹ اللہ اور اس کے رسول کو حاضر ناظر
جان کر یہ حلفیہ بیان کر رہی ہوں کہ اس سکول یعنی

گورنمنٹ ہائی سکول قصاب خانہ کے حالات بالکل ٹھیک
ہیں ہیں، کیونکہ سکول کی سید مسٹر بیسٹن مجسٹریٹ بنجاری کو سکول
سے زیارہ این دو کا نڈاری کی زیارہ نگر ہوئی تھی۔ مگر اس
غور ملازمین کو سسر پر بٹھایا ہوا تھا کہ وہ ارشد

اس کے پے ٹکسٹین چلاتا تھا۔ اور جب یہ ڈیڑھ سال سے
سکول سے چلی جاتی تھی تو اسے رکشے میں بٹھا کر سائیکو میں
لگانے پینے کا پیپر میں بھی دیکر رخصت کر دیتا تھا۔ اور شرک و عداوت
بیان کا سوسپر بھی لکھتی ڈیڑھ سال اور کینہ انسان ہے۔

اس ڈیڑھ سال میں اس کے ملا سونے کی صفائی پینائی
میں نے بار بار میڈم کے ٹولٹا میں یہ بات لکھی تھی
وہ ہمیشہ کہتی تھیں کہ یہ ٹولٹا ہی (bad) نہ لکھے۔ جس
سے لکھی نہ وہ ٹولٹا لکھیں لکھی رہی تھی کہ یہ کیوں اللہ
سیورٹ کر رہی ہے۔

کہ تو میرے واقعہ کے بعد تو چاہیے تھا کہ کینیڈا میں مکمل بند ہو جائے
 لیکن اس کے باوجود جب تک مجھے 12/11/2002 تک جہاز تک پہنچا
 گیا تھا نہ آئی اس وقت تک کینیڈا جاری تھی اور
 جب ارشد پکڑا گیا تو پھر 13/11/2002 سے کینیڈا میں بند ہو گیا
 سر میں نے ہی آجاکو سب سے پہلے یہ سارے واقعات بتائے جبکہ
 وہ سے میڈیا کے پیرا خلاف پوری سکول میں پروپیگنڈا کر رہا
 کر رہے تھے کہ میں صانعہ کی وجہ سے آپسکے گاڑوں میں
 تباہی ہو جائیگی۔ اور سب کی سبکدوشی ہو جائیگی وغیرہ
 وغیرہ۔ ڈیڑھ سال میں میڈیا نے کچھ کوئی چیز نہیں
 لکھی۔ اسیا مہرا خلاف، گندی زبان اور گھنٹی عورت
 ہیں۔ 15/10/2002 کو ان کی ریکوئسٹری ہوئی تھی۔ اچھے
 کتب اس ریکوئسٹری کی رپورٹ کاشیہ ساہزبینا آیا
 آسنی میں یہ نہیں آئی ان کے کہنے کے ساتھ ساتھ یہ کہہ کر ان
 کو آسنی کے اندر کے معاملات اور رپورٹس پہلے سے ہی
 مل جاتی ہیں۔ یہ پیکر و کورڈنگلاس اور
 گندی گلابیاں یعنی کچھ اصل کی تھی۔ ردیل کی کچی
 حبیب کی کچی جیسے نازیبا رنگوں استعمال کیے۔

یہ وہی آپ سے یہ التماس ہے کہ سسر پلینر اس صورت یعنی
محمد بن بخاری اور انکا جمعہ (میں شہلا) اور کلا
فور کو فی الفور بیان سے ہٹایا جائے۔ تاکہ سکول پر مہتمم
کے گنڈ سے پاک ہو جائے۔

بروز منگل 2021/11/16 کو میں ٹینہ اختر نے تمام کلاسز
کی ٹریکیں سے پوجا کی جو تو سب پر شرمنگ واقعات
سبب بنے۔

محمد بن کے ہم دو غیر کام کے بچے انکی ایچارج میں
شہلا ہوتی ہیں۔ جب یہ غیر حاضر ہوتی ہیں تو پورے کلاس
کئی ہیں کہ یہ Rule ہے کہ میٹرم کی C. Leave لینا چاہیے۔ بعد
انکی حاضری لگائی جاتی ہے۔

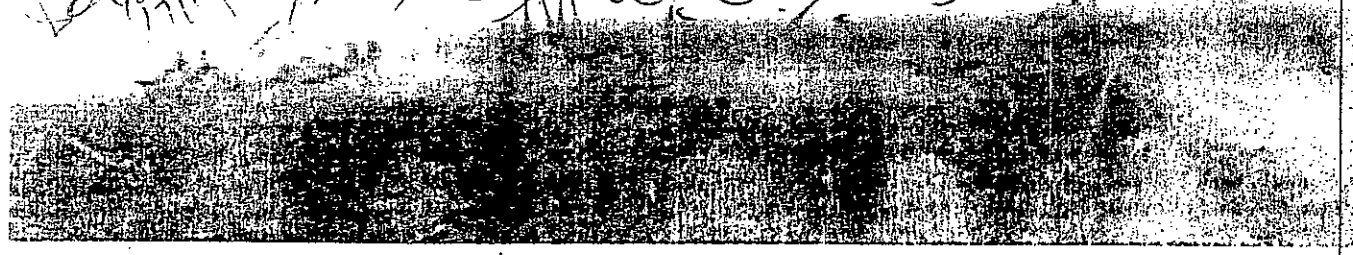
دل زخمی زخمی ہے، سسر پلینر القاف کریں۔

فرشتے سے سیر ہے انسان نبنا
مگر اس میں بڑی ہے صحت و بارہ

کرو میں بانی تم اہل زمین پر
خدا سیر بان ہوگا ہر شے پر میں پر

4005CF
17/11/2021

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تاریخ:

آپ کا عیدہ اور رقم کا تفصیلی ماہوار آپ اس سکول میں لیا
خدمات سرانجام دینے کے ہیں۔

مذکورہ خطاب، آنسو پوری کیمبریا صاحب
میرا نام واحد علی ولد شاہ سید جس کو گورنمنٹ
پرائمری سکول سرکی میں چوکیدار دعوت
اور میری ڈیوٹی شام 4 بجے سے 8 بجے تک ہوتی
ہے اور میں اس سکول میں 2013 سے 2013
سرانجام دے رہا ہوں۔

آپ سے ادرشاہ بن قائمینی بھیموں کے ساتھ زیادتی
یا ان کے توت کے متعلق جو کچھ جانتے ہیں۔ بیان کریں۔

جناہ عالمی 11 میں عیدہ اور سٹڈ کو 2013 سے
جانتا ہوں کیونکہ میں 2013 میں اس سکول
میں آیا ہوں۔ 2013 سے آٹھ تک
سکول میں ہوتا تھا اور اس کے سرکار کے
تعمیرات کے بارے میں میں کبھی تشویش
کبھی تعلق میں چونکہ خود چوکیدار دعوت
اور میری بات سے اس کو ترقی ملی کبھی کے دفعہ
اسکو سبھا یا لیکن وہ میں جانا۔ آٹھ کو ہی نہ توی
عمر متعلق لوگ اسے پاس آئے تھے اس لیے میں
ایک طرف سے شہادت دے رہا ہوں کہ اس کے جو قبائل
کبھی دعوت دہائی کے میں میں نے قبیلہ کے وقت میں
پانچ کلومیٹر لگا کر اسے اس کے پاس لے کر
یا بود ڈی جے D.M. میں نے لیا۔ کیونکہ یہ بود ڈی جے

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تاریخ:

دن:

جاتا تو آج یہ بدنامی ہماری کولہ کے رہتی ہے
جب جب کولہ میں وہی مرد اشخاص کے
بچوں کے والدین ہمارے کپڑے تو بھی آ رہے ہیں
کو بھی پڑھاتا تھا۔

سہ ماہی لوگ میری باقیہ الفاظ میں کہ
میں نے جو میرا فرض تھا وہ ادا کیا
کاروائی ان لوگوں کی طرف سے ہو چکی ہے جو
اس پر چپ رہے اور گناہ کو کھینچنے کا موقع
فراموش کیا۔

واحد علی چوکیدار

G. G. S. Sarki Gata, Peshawar
موجودہ بلڈنگ پر اپنا قیام جانے

22/11/2021

HEAD MISTRESS
G. G. S.
QUAIDABAD

Govt. Shalimar High School, Quaidabad

30-12-2021
گورنمنٹ ہائی اسکول
گوالیار

پتھر

پتھر

پتھر ایک سنگ ہے جو زمین کے اندر
گہرائی میں پائی جاتا ہے۔ یہ
مٹی اور لٹریٹ کے ذریعے بنتا ہے۔
یہ سنگ سخت اور بھاری ہوتا ہے۔
یہ سنگ کو پتھر کہتے ہیں۔
یہ سنگ کو پتھر کہتے ہیں۔
یہ سنگ کو پتھر کہتے ہیں۔
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یہ سنگ کو پتھر کہتے ہیں۔
یہ سنگ کو پتھر کہتے ہیں۔

پتھر سے بنی ہوئی چیزیں
پتھر سے بنی ہوئی چیزیں

M/o Hira Batal G-2
Mrs

حضرت جناب انور شاہ آصفیہ ایجوکیشن

K. P. K. Peshawar.

جناب عالی:

مودبانہ گزارش ہے کہ میری

بیٹی حیرا بتول کلاس ۹A کی سٹوڈنٹ ہے

میری آپ سے درخواست ہے کہ جس ~~میں~~ ^{اگرچہ}

کی وجہ میری بیٹی کی زندگی خراب ہوئی اس کو سنا دی جائے

اور یہ 9A کلاس کی ٹری ہے راجیلیم پرائمری سکول ہے

اس سے مکمل انکوائری کی جائے کہ کیوں اس کا کرنا ہے کس سے

اس کا کرنا ہے سکول کے ماحول سے بچوں کو نفرت ہوتی

ہے آپ سے گزارش ہے کہ ہر طرح سکول کے بچوں کو

محفوظ دیا جائے میری بیٹی کے ساتھ بہت بے انصافی ہو گئی

یہ تمام لٹریچر کے حق میں بہتر ہو گا۔ تمام لٹریچر کی عزت

محفوظ ہوگی۔ تمام لٹچر اور عید عرس سے گزارش ہے کہ سکول

میں تمام لٹریچر پر نظر رکھے تمام سٹاف کو الٹریٹ رکھیں

Thank you

Kulsoom Bib. Mother of Hira Batal

M T W T F S

DATE 1/11/20

نام اقبال کے لیے...
آپ کے لیے...
...

پیرا 1: اقبال کے لیے...
...

پیرا 2: اقبال کے لیے...
...

پیرا 3: اقبال کے لیے...
...

پیرا 4: اقبال کے لیے...
...

پیرا 5: اقبال کے لیے...
...

پیرا 6: اقبال کے لیے...
...

پیرا 7: اقبال کے لیے...
...

پیرا 8: اقبال کے لیے...
...

پیرا 9: اقبال کے لیے...
...

Handwritten notes and stamps on the left margin, including a date stamp '20/11/20' and a school stamp 'Govt. Girls High School, Kasab Khana, Lahore'.

168
 نامہ لکھ کر سربراہ کو پیش کیا جائے گا۔ یہ
 ہے جو کہ طلبہ کی طرف سے لیا گیا ہے۔

یہ لکھ کر ان کے پاس لے کر آئے گا۔ ان کے پاس
 لکھ کر ان کے پاس لے کر آئے گا۔ ان کے پاس
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یہ اس کے لئے ہے۔ اس کے لئے
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30/12/2017

Handwritten signature

HEAD MISTRESS
 Govt. Girls High School
 Qasab Khana Peshawar

0315-5218001

قیمت 50 روپے

122098



ایڈوکیٹ:
 بار کونسل ایسوسی ایشن نمبر: bc-106260
 رابطہ نمبر: 3333-9039106

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: **صمیمہ ضعیفہ دکتو نخواستہ** سرورین سرورین سرورین سرورین

	دعوی:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

مخانب: **سید / سید**

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کا روای کاروانی کا مقصد **آن مقام** کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروانی کا کمال اختیار ہوگا، نیز ذمیل صاحب کو راضی نامہ کر کے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروانی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہر اہل اپنے ہر کام کے اختیار ہوگا اور صاحب مقرر شدہ کو وہی ہر مقدمہ مذکورہ بااختیارات حاصل ہوں گے اور ان کا ساتھ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دودہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

الرقوم: **22-6-2022**

الع **22-6-2022**

مقام **22-6-2022**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کا روای کاروانی کا مقصد **آن مقام** کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروانی کا کمال اختیار ہوگا، نیز ذمیل صاحب کو راضی نامہ کر کے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروانی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہر اہل اپنے ہر کام کے اختیار ہوگا اور صاحب مقرر شدہ کو وہی ہر مقدمہ مذکورہ بااختیارات حاصل ہوں گے اور ان کا ساتھ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دودہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

وکالت نامہ کی فوٹو کاپی منجمل قبول ہوگی۔