

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 983/2024.

Inayat-ur-Rehman S/O Ajmal Khan R/O Babak Mandar Khel, Lakki Marwat Ex-Constable
No. 6092 FRP Bannu Range.Appellant.

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar &
others.....Respondents.

INDEX

S. NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE No.
1.	Para-wise Comments		03
2.	Punishment orders	A,B	04-05
3.	DD reports	C,D	06-7
4.	Charge Sheet & enquiry report	E,F	08-9
5.	Show Cause Notice and Findings report	G,H	10-11
6.	Departmental appeal	I	12
7.	Rejection order	J	13
8.	Statements of witnesses	K,L	14-15
9.	Affidavit		16 ..
10.	Authority Letter		17
Total			17


RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 983/2024.

Inayat-ur-Rehman S/O Ajmal Khan R/O Babak Mandar Khel, Lakki Marwat Ex-Constable
No. 6092 FRP Bannu Range.Appellant.**VERSUS****Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.****PARAWISE REPLY BY RESPONDENTS 1 to 3****RESPECTFULLY SHEWETH.****PRELIMINARY OBJECTIONS:-**Khyber Pakhtunkhwa
Service TribunalDiscy No. 17844Dated 11-11-24

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
3. That the appellant has no cause of action and locus stand to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal the material facts from this Honorable Tribunal.

FACTS:-

1. Para is correct to the extent of enlistment however, every police officer after appointment is under obligation to perform his official duties with devotion and honesty. Appellant during service proved himself an inefficient official as from perusal service record of appellant, it reveals that he remained absent from lawful duty for total period of (601) days and on account of which he was awarded different punishments. (Copies of previous punishments are attached as annexure "A & B")
2. Incorrect. The appellant alongwith others were deputed for emergency duty at District DI Khan as per DD report No. 03, dated 18.10.2021, wherein he remained absent from duty vide DD report No. 31, dated 19.10.2021 till to 07.12.2022 for total period of (414) days, without any leave or prior permission of the competent authority. (Copies of such DD reports are attached as annexure "C & D")
3. Incorrect. On account of misconduct as discussed in Para 2 above the appellant was proceeded against, departmentally for which he was issued Charge Sheet alongwith Summary of Allegations and an Enquiry Officer was nominated to conduct proper enquiry into the matter.
4. Incorrect. On account of willful absence the appellant was proceeded against departmentally and after completion of enquiry, the Enquiry Officer submitted his findings, wherein he reported that the Charge Sheet was served upon his uncle namely Muhammad Ayub through special messenger on his home address. During the service of Charge Sheet the statement of the appellant's uncle was also recorded, who disclosed in his statement that the appellant is mentally disturbed and is being under treatment and ensured that when he become stable, he will be reported for his duty. However, the appellant failed to submit his reply of Charge Sheet. (Copies of Charge Sheet and enquiry report are attached herewith as annexure "E & F"). Upon the findings of Enquiry Officer he was issued Final Show Cause Notice and served upon his above named uncle on his home address and his signature was obtained as a token of its receipt. Hence, the appellant's uncle submitted reply of Show Cause Notice, before the competent authority on behalf of appellant, which was found unsatisfactory by the competent.

However, the reply of Show Cause Notice submitted by the appellant's uncle was entrusted to the Enquiry Officer by the competent authority for further enquiry and report. The Enquiry Officer after examination of relevant record as well as medical certificates produced by the appellant's uncle submitted findings report, wherein the appellant was found guilty of the charges leveled against him and recommended for major punishment. (Copies of Final Show Cause Notice & such finding report is attached as annexure "G & H")

5. Incorrect. Although the appellant joined the duty on 15.02.2023, and during the pendency of enquiry he received the monthly salary till finalization of enquiry.
6. Incorrect. As departmental enquiry against the appellant was under process and during the course of enquiry, the allegations leveled against the appellant were fully established and the Enquiry Officer recommended him for major punishment. Hence, in the light of recommendation of enquiry officer and other material/evidence available on record the competent authority awarded him major punishment of dismissal from service in accordance with law/rules.
7. Incorrect. Appellant filed departmental appeal on 21.02.2023 as per this office record, which was processed in accordance with existing procedure/rules. (Copy of his departmental appeal is attached as annexure "I").
8. Correct to the extent that departmental appeal of the appellant was thoroughly examined and found meritless. Hence, his appeal was rejected on sound grounds.
9. Incorrect. Departmental appeal of the appellant was already rejected by the appellate authority vide order dated 28.03.2023 and copy of the same has also been conveyed to the appellant on his home address vide Endst: No. 3040/SI Legal, dated 28.03.2023. (Copy of rejection order is attached as annexure "J")
10. The revision petition of the appellant was thoroughly examined as per law rules and rejected on the ground of time barred.

GROUNDS:-

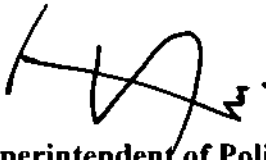
- a. Incorrect. Perusal of enquiry file reveals that the appellant remained absent from lawful duty with effect from 19.10.2021 till to 07.12.2022 for total period of (414) days, without any leave or prior permission of the competent authority, copies of DD report No. 31, dated 19.10.2021 and DD report No. 03, dated 07.12.2022 already enclosed as annexure "C & D". The medical plea of appellant is illogical and pre-planned.
- b. Incorrect. The documents with regard to treatment provided by the relative of appellant are found not satisfactory by the competent authority as the same did not cover the appellant's absence period from duty.
- c. Incorrect. On the allegations of absence, the appellant was proceeded against proper departmentally and during the course of enquiry, the same were fully established against him. However, during the pendency of enquiry, the appellant was not placed under suspension by the competent authority in the best interest of official duty.
- d. Incorrect. As proper departmental enquiry has already been conducted against the appellant, as he was issued Charge Sheet based on summary of allegations, which was served upon on his uncle namely Muhammad Ayoub through special messenger on his home address and his signature was obtained as a token of it receipt. Moreover, the statements of all witnesses were recorded by the enquiry officer during the course of enquiry. (Copies of the statements of

witnesses are attached as annexure "K& L") Besides, the appellant was provided full-fledged opportunity of defense, personal hearing as well as ample opportunity of cross examination but he deliberately failed to avail these opportunities. Hence, the appellant was absolutely treated in accordance with law within the meaning of Article 4 of the constitution by giving him all opportunities of defence and that the entire proceedings were carried out in accordance with existing laws/rules.

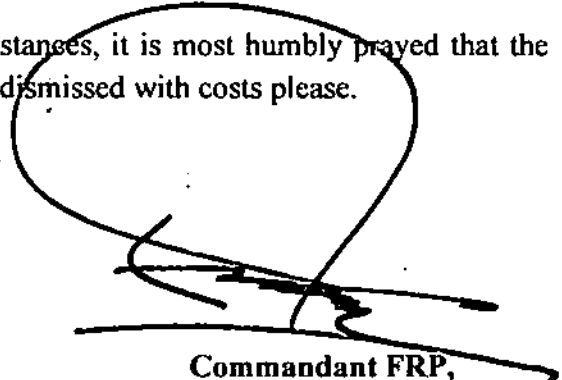
- e. Reply already given vide Para "a" quoted above
- f. Incorrect. During the course of enquiry the willful absence of the appellant from official duty was proved against him without any shadow of doubt.
- g. Incorrect. The appellant having a blemished service record being habitual and inefficient official as perusal of his service record reveals that he remained absent from lawful duty for a total period of (601) days previously, to which he was awarded certain punishments, but he did not mend his way by repeating the same practice time and again. It is worth to mention here that there are 02 bad entries in his service record with no good entry in his credit. (Copies of previous punishments are already attached with the instant reply as annexure "A & B")
- h. Incorrect. As all the orders passed by the respondents in the case of appellant are legally justified and in accordance with law/rules.

PRAYERS:-

Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal is devoid of merits may kindly be dismissed with costs please.



**Superintendent of Police FRP,
Bannu Range, Bannu
(Respondent No. 01)
Sartaj Khan
Incumbent**



**Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)
Syed Ashfaq Anwar (PSP)
Incumbent**



**DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03)
Dr. Muhammad Akhtar Abbas (PSP)
Incumbent**

ORDER

This order shall dispose of the enquiry proceedings pending against Constable Inayat Ur Rehman No.5726/FRP as the official was charged for commission of the following miss-conduct.

Reported to have found absent from duty, for the below mentioned periods without any leave or lawful permission of the superiors.

From	To	Days
06-04-2018	17-04-2018	11
25-04-2018	30-04-2018	05
08-05-2018	21-05-2018	13
		Total (29 days)

Enquiry Officer conducted preliminary enquiry into the allegation and submitted his findings dated 03-07-2018, wherein it was reported, that accused official took the plea of his father illness but with no medical proof / documents in support of his plea. Finally Enquiry officer suggested that the plea taken by defaulter official is neither factual nor satisfactory. Accused official personally appeared before the undersigned, also heard in person, and personal hearing was not found convincible.

The record in hand was thoroughly examined and perused at length, which revealed that allegations leveled against the defaulter official stands proved.

Keeping in view I, Nisar Muhammad Khan SP/FRP Bannu being a competent authority has taken a lenient view & pass order under Police Rules 1975 forthwith below mentioned i.e.

1. Absence period of the (29) days treated without pay.
2. Imposition of fine Rs.1000/.
3. Pay released.

OB No. 273

Dated: 03/07/2018.

C/E
16-08-2018

Attorney
[Signature]

Superintendent of Police,

FRP Bannu
Superintendent
FRP Bannu

SRC
[Signature]
28-8-18

My this order shall dispose of the enquiry cases pending against Constable Inayat Rahman No:6092 FRP as the official who was absent from lawful Govt: duty w.e. from 17-11-2019 to 26-12-2019 for the total period of (39) days at Police Station parowah District D.I.Khan without any leave, justification or legal permission of the competent authority.

On the above charges accused official was charge sheeted & SI/PC Aslam Khan was appointed as Enquiry Officer with the directions to conduct inquiry into the matter within stipulated period.

Enquiry Officer conducted enquiry and submitted his findings Dated 23-01-2020, wherein defaulter official have found guilty of the charges leveled against him. That defaulter official replied to the charge sheet within stipulated period. In reply to the charge sheet he took the plea of his father illness but no medical proof/documents. Finally Enquiry Officer declared him willful and habitual absentee and recommended him for imposition of Major/Minor Punishment.

He was also heard in person, during the course of hearing he advanced cogent reason in his defense, his plea was not found convincing and satisfactory.

Keeping in view the recommendation of the enquiry officer, now therefore I, Kifayat Ullah Khan Wazir (psp) Superintendent of Police, FRP Bannu, in exercise of the powers vested in me under Police Rules 1975 do hereby imposed upon him the penalties below mentioned i.e.

1. The absence period of (39) days is treated as without Pay.
2. 05 days quarter guard.
3. Censure & Pay released.

OB No. 49

Dated: 24-01-2020.

Attest
[Signature]

[Signature]
Kifayat Ullah Khan Wazir) PSP,
Superintendent of Police,
FRP, Bannu

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Attorney

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Date of ...

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Hakim

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M. M. Farooq

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CHARGE SHEET

I, Abdul Sattar, Superintendent of Police FRP, Bannu as competent authority, hereby charge you Constable Inayat Rahman No.6092/FRP for the purpose departmental enquiry proceedings as follows.

- That you Constable Inayat Rahman No.6092/FRP absented yourself from lawful duty without any sanctioned leave or prior permission of the competent authority vide Daily Diary No. 31 dated 19-10-2021 to till date at Police Station Parova District DI Khan. Your Pay has been stopped to this effect.
 - Previously you had remained absent for () days and were awarded punishment for the same but you did not mend your trend.
 - Such act on your part is against service discipline and amounts gross misconduct/ negligence in duty.
1. By reason of the above you appear to be guilty of misconduct under the Police Rules 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27th of August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
 2. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.
 3. Your written defense, if any, should reach to the Enquiry Officer 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.
 4. You are directed to intimate whether you desire to be heard in person.

کافی بیان ہے۔ A statement of allegation is enclosed.

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دستور =

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0307-8479716- = نوٹ
0312-5891187

13/01/22 =

Sattar
Superintendent of Police,
FRP, Bannu

P. 449

03119102734
03018758543

Attendant
[Signature]

031552667062

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08-02-23
08 Nov 23

Superintendent of Police
FPP/Banaru

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F.O. P.M.P. B...
10/12/22

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FINAL SHOW CAUSE

I, Abdul Sattar, Superintendent of Police, FRP Bannu Range, Bannu as competent authority, under Rule 5(3) of the Khyber-Pukhtunkhwa Police rules (As amended vide Khyber-Pukhtunkhwa gazette Notification, No.27th of August 2014) for the following misconduct hereby serve upon you Constable Inayat Rahman No. 6092 this final show/ cause notice.

- > That Constable Inayat Rahman No. 6092 has absent himself from lawful duty without any sanctioned leave or prior permission of the competent authority, while posted at Police Station Parova District DI Khan vide daily dairy No. 31 dated 19-10-2021 to till date. His pay was stopped to this effect.
- > Such act on your part is against service discipline and amounts gross misconduct/ negligence in duty.

That consequent upon the completion of enquiry conducted through enquiry officer: FRP, Bannu submitted findings report and reported that the allegations contain in the charge sheet have fully been proved against the defaulter Constable Inayat Rahman No. 6092 is proved.

As a result, I, as a competent authority, have tentatively decided to impose upon you one or more punishments including dismissal as specified the rules.

You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you.

If no reply to this notice is received within seven days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

The copy of the findings of the Enquiry Officer is enclosed.

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Sattar 22/2/22
 Superintendent of Police,
 FRP, Bannu.

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B.O.P.P.P. 3000

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For Commandant

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Mobile No = 0311-9102734
ENCL No = 11201-3203694-5
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6092 FRP
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16/02/03
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(43)

J

ORDER

This order will dispose of the departmental appeal preferred by constable Inayat Ur Rehman No. 6092 of FRP Bannu Range, against the order of FRP Bannu Range issued vide OB No. 78, dated 08.02.2023, wherein he was awarded major punishment of dismissal from service.

Brief facts of the case are that the delinquent constable remained absent from duty with effect from 19.10.2021 to 07.12.2022 for a total period of 414 days without any leave or prior permission of the competent authority. He was proceeded against proper departmentally as he was issued charge sheet alongwith summary of allegations and enquiry officer nominated to conducting enquiry against him.

The Enquiry officer deeply probed into facts with submission of his findings report, wherein he reported that the charge sheet was served upon his uncle, namely Mohammad Ayub through special messenger on his home address, who disclosed in his statement that the defaulter official is Physiologically and mentally disturbed and is being under treatment. He further disclosed that on 29.11.2021 the accused official was admitted in Caring Center Islamabad for better treatment and ensure when he become stable, he will report back for duty.

Consequently Final show Cause bearing No. 299 dated 22.02.2022 was properly served upon Mohammad Ayub (uncle) of the defaulter official on 22.02.2022. The uncle of accused officer submitted reply of Show Cause Notice on 28.02.2022, which was found unsatisfactory.

Keeping in view the above facts he was accordingly dismissed from service by the competent authority vide OB NO. 78 dated 08.02.2022.

Feeling aggrieved against the impugned order of SP FRP Bannu Range, Bannu, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 24.03.2023.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. From perusal of enquiry file it has been found that the allegations leveled against the appellant were fully established during the course of enquiry. Perusal of his service record reveals that previously he also remained absent from duty for a long period of (601) days with award of certain punishments, but he did not mend his way. Thus there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.


Order Announced.


Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No 3040 /SI Legal, dated Peshawar the 28/3 /2023.

Copy of above is forwarded for information and necessary action to the:-

1. SP FRP Bannu Range, Bannu. His Service record alongwith D-file sent herewith.
2. Ex-constable Inayat Ur Rehman No. 6092 FRP Bannu S/o Ajmal Khan R/o Village Dabak Mandra Khel, Police Station Lakki Marwat, District Lakki Marwat.

Attested


Attorney
J. J. [unclear]

~~Attorney~~
03/2/20

MOB - 0332548400

CNC - 11015699248-9

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K

11-8-2022

Date

M. C. P. N.

Uttarakhand

0812-898721

112-1-5344586-7

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 983/2024.

Inayat-ur-Rehman S/O Ajmal Khan R/O Babak Mandar Khel, Lakki Marwat Ex-Constable No. 6092 FRP Bannu Range.Appellant.

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.

AFFIDAVIT

We respondents No. 01 to 03 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our knowledge and belief that nothing has been concealed from this Honorable Court.

answering *noy -Hear* *it is further stated on oath that in this appeal, the respondents have neither been placed ex-parte actions defence has been struck off.*

**Superintendent of Police FRP,
Bannu Range, Bannu
Sartaj Khan.
(Respondent No.01 to 03)**

ATTEST



2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 983/2024.

Inayat-ur-Rehman S/O Ajmal Khan R/O Babak Mandar Khel, Lakki Marwat Ex-Constable
No. 6092 FRP Bannu Range.Appellant.

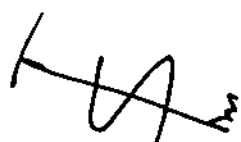
VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar &
others.....Respondents.

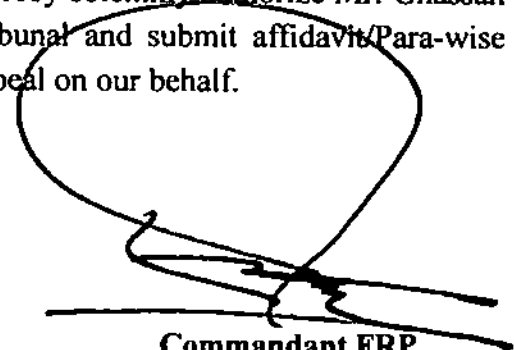
AUTHORITY LETTER

Respectfully Sheweth:-


We respondents No. 01 to 03 do hereby solemnly authorize Mr. Ghassan Ullah ASI of FRP HQrs to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.



**Superintendent of Police FRP,
Bannu Range, Bannu
(Respondent No. 01)
(Sartaj Khan)
Incumbent**



**Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 05)
(Syed Ashfaq Anwar) PSP
Incumbent**



**DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)
(Dr. Muhammad Akhtar Abbas) PSP
Incumbent**