

28.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 17.05.2022 for the same as before.

  
Reader

17.05.2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments on behalf of respondents not submitted. Learned AAG requested for time to submit reply/comments. Granted. To come up for written reply/comments on 22.07.2022 before S.B.

  
(MIAN MUHAMMAD)  
MEMBER (E)

30.07.2021

Appellant present in person. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted for full 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 in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 15.12.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

24/7/21

  
Chairman

15.12.2021

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Written reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. To come up for written reply/comments on 28.02.2022 before D.B.



  
(MIAN MUHAMMAD)  
MEMBER (E)

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 5792 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/06/2021	<p>The appeal of Mst. Bibi Razia resubmitted today by Mr. Farmanullah Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30/07/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mst. Bibi Razia Ex District Education Officer (F) Bannu received today i.e. on 19.05.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- ✓1- Appeal has not been flagged/marked with annexures' marks.
- ✓2- Annexures of the appeal may be attested.
- ✓3- Affidavit may be got attested by the Oath Commissioner.
- ✓4- Memorandum of appeal is unsigned which may be got signed.
- ✓5- Copy of show cause notice mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- ✓6- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- ✓7- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- ✓8- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

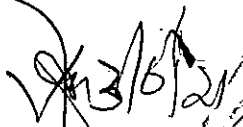
No. 840 /S.T,

Dt. 25/05 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Farmanullah Khattak Adv. Pesh.

- ① Appeal has been properly flagged/marked with Annex
  - ② Annexures of Appeal duly attested
  - ③ Affidavit got attested from Oath Commissioner
  - ④ Memorandum of Appeal got signed.
  - ⑤ Show Cause (Final) Annex with the Appeal.
  - ⑥ Dept Appeal is already attached but escape your notice.
  - ⑦ Annexures are now in sequence
  - ⑧ Original with six sets copy attached on each file.
- Objections removed and placed before the Hon'ble Chairman K.P. Service Tribunal

  
13/6/21

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 5792 /2021

Mst. Bibi Razia ..... Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary Elementary &  
Secondary Education, Peshawar and others ..... Respondents

**I N D E X**

S. No.	Description of documents	Annexs	Pages
1.	Service Appeal		1-7
2.	Copy of facts findings enquiry	A	8-9
3.	Copy of charge sheet & Statement of allegation and reply	B to B/2	10-13
4.	copy of enquiry report	C	14-22
5.	Copy of Final Show Cause Notice & Reply	D & D/1	23-27
6.	Copy of impugned order	E	28
7.	Copy of Review petition/ Departmental Appeal and rejection of appeal/regret letter	F & G	29-37
8.	Copy of the letter employment registration card and internal advertisement for appointment dated 01.08.2016	H	38-45
9.	Vakalat Nama in original		46

Through Appellant

**(Farmanullah Khattak)**  
**Advocate Supreme Court.**

Dated: 03.06.2021

①

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL KHYBER  
PAKHTUNKHAWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2121.

Mst. Bibi Razia Ex. District Education Officer (F) Bannu Khyber  
Pakhtunkhwa, Presently Principal Government Girls Higher Secondary  
School Chowkara Distt. Karak.....Appellant.

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar.
3. Director Elementary & Secondary Education Directorate, Khyber Pakhtunkhwa, Peshawar.

.....Respondents.

APPEAL under Section 4 of the Khyber Pkhtunkhwa Service Tribunal Act, 1974 against order No. SO(S/F)E & SED/4-17/2010/Bibi Razia, Dated, November 4<sup>th</sup>, 2020, vide which minor penalty of "Stoppage of one increments for one year" has been imposed and against which departmental appeal/review petition had been regretted, vide, order dated, April 16<sup>th</sup>, 2021 and issued & signed on behalf of the competent authority on 22-04-2021.

**PRAYER IN APPEAL**

THAT on acceptance of the instant appeal, this Hon'ble Tribunal may graciously be pleased to set-aside the impugn order No. SO(S/F)E & SED/4-17/2010/Bibi Razia, Dated, November 4<sup>th</sup>, 2020 and subsequent order of rejection of Departmental Appeal, vide which minor penalty of "Stoppage of one increment for one year" has been imposed, being illegal, void-ab-initio and of no legal effect OR any other remedy deemed proper and appropriate may also be allowed.

**Respectfully Sheweth:**

The appellant very humbly submitted as under:-

1. That enquiry proceeding was initiated against appellant on the basis of so called synonymous complaint by one Mr. Khan Zada S/o Muhammad Sher Khan R/O Domel District Bannu, wherein, the allegation were leveled that in recruitment process rules were violated on appointment of class-IV employees against two posts of Naib Qasid and Chowkidar in the office of SDEO (Female) Domel, Bannu.
2. That on the basis of aforesaid complaint, Secretary Elementary and Secondary Education office vide endorsement No. 7893-96 dated 27<sup>th</sup> February, 2017 appointed one Imtiaz-ul-Haq the then District Education Officer (Male) Bannu to conduct preliminary enquiry, who submitted preliminary inquiry with the recommendation that the appointment of one of the candidate being non local i.e. not belong to Tehsil Domel, however he belongs to District Bannu. (Copy of the fact finding enquiry is hereby enclosed as Annexure-A).
3. That thereafter formal Regular Inquiry was initiated and appellant was formally proceeded in disciplinary action under Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations. (Copy of the Charge Sheet & Statement of allegation is hereby enclosed Annex-B & B-1).
4. That proceedings of the enquiry committee was finally culminated with the recommendation that recruitment rules in the appointment of Class-IV has been violated and the charge stands proved against the appellant, however, it was also recommended that disciplinary action may also be taken against one Mr. Sher Daraz Khan the then Deputy Director (P & D) serving in the Directorate of E& SE under E & D Rules, 2011, as his role was doubtful and on one hand he signed the minutes of the DPC on the same date & venue, while on the other hand he had denied by not attending the meeting of Selection Committee for appointment of Class-IV Employee. (Copy of the enquiry Report is hereby enclosed as Annex-C).

5. That on the basis of recommendation in the enquiry report, appellant was served with a Final Show Cause Notice, dated, 10-12-2019 before imposition of minor penalty which was duly replied by refuting the allegations in the show cause notice. (Copy of the Reply is hereby enclosed as Annex-D).
6. That when reply to the show cause notice was submitted, appellant also requested for personal hearing which was granted to the appellant on 24-09-2020 by the Secretary Relief, Rehabilitation & Settlement Department on behalf of the Competent Authority.
7. That competent authority after considering the charge sheet/Statement of allegations and reply to the show cause notice imposed minor penalty of "Stoppage of one increment for one year", vide, impugn order, dated, November 04, 2020. (Copy of the impugn order is hereby enclosed as Annex-E).
8. That appellant aggrieved from the impugn order filed review petition/department appeal before the competent authority on 20-11-2020, however, review petition of the appellant was finally regretted vide order No. SO(S/F)E&SED/4-17/2020/Mst. Bibi Razia, Dated, April 16<sup>th</sup>, 2021 issued & signed on 22-04-2021. (Copy of the review petition and regretted letter are hereby enclosed as Annex-F & G).
9. That the appellant herein seriously aggrieved from the impugned orders approached to this Hon'ble Tribunal, through the instant appeal, inter-alia, on the following grounds:-

GROUND:

- A. That the order passed by the competent authority and impugned herein is discriminatory, arbitrary, legally and factually incorrect and smacks of malafide and thus are liable to be set-aside by this Hon'ble Tribunal.
- B. That the impugn order of minor penalty based upon unsubstantiated allegations which had never been proved against appellant. The inquiry committee neither collected any evidence nor brought on record any documents in support of the charges



irrespective of the fact that the appellant was neither confronted with any documentary evidence nor opportunity of any cross examination was provided to her.

- C. That the enquiry committee was so much bias/partial against the appellant that they even not only concluded in the recommendations that the charges had been proved against the appellant rather gone for away from their mandate and power in order to ruin the bright carrier of the appellant.
- D. That enquiry committee report is based upon on assumption and presumption and there is nothing on record which can suggest that charges of violation of rules of class-IV appointment had been proved against the appellant. While on the other hand, appellant submitted sufficient material covering convening meeting of DPC and DSC on the same date and venue as well as vide letter no 6619, dated 14-08-2016 in which one Sher Daraz Deputy Director PND has been nominated to attend the meeting of DSC/ DPC held on 16-08-2016. (Copies of the letters employment registration card and internal advertisement for appointment dated 01-08-2016 are hereby enclosed as Annexure-H)
- E. That the enquiry committee conducted the enquiry at the back of the appellant and enquiry was conducted in prejudice manner with malafide intention.
- F. That the appellant is totally innocent and has been subjected to minor penalty on the basis of un-substantiated allegations having no fault of his but apparently due to politically motivated reasons by ignoring the true facts surfaced on record. The Policy in Class-IV has duly been adhered and no departure has been made.
- G. That the Director Elementary and Secondary education blindly ignored the policy instructions contained in S&GAD which stated that "the complainant while submitting a complaint against a civil servant, he should be asked to furnish an affidavit to the effect that all the facts stated in his complaint are true, and if his affidavit is proved false, he would be prepared to face legal actions which would be taken against him" unfortunately, despite highlighting

these policy instructions the inquiry failed to record the statement of the complainant.

- H. That the complainant was neither called by any of the enquiry officer nor was his statement ever recorded during the inquiry proceeding in order to put forth his point of view. It is pertinent to mention over here that the complaint was never verified and out of nowhere action was taken against appellant.
- I. That the aforementioned complain is one sided and appellant was never given an opportunity of being heard whereas the principle of "No One should be condemned unheard" is violated.
- J. That the appellant is straightforward and did her duties with utmost honesty which cause inconvenience to influential Local Malik, MPAs and were striving hard to oust and depose appellant from the post of management as a retaliation and eventually succeeded regrettably. ~~\_\_\_\_\_~~
- K. That as a matter of record, appellant has been subjected to gender discrimination by imposing minor penalty without any lawful justification. Beside any sustainable proof of insubordination leading towards misconduct contained in the charge sheet and statements of allegation has not been proved and that too by discarding reply to the charges without any just cause.
- L. That the review petition was dismissed in harsh manner without discussing the true stocks of the position and merits of the case, erring in application of correct legal mind in its true prospective.
- M. That the appellant rendered meritorious service and there is no adverse entry of any misconduct or in-subordination during the entire service and the penalty impugn herein would ruin the bright carrier of the appellant in the long run. The enquiry committee totally deviate the procedure laid down in the E & D Rules. Appellant was neither provided any opportunity of personal audience nor confronted to any policy violation on the basis of

which minor penalty has been imposed nor statement of any witness has been recorded in front of her nor any opportunity of fair trial was awarded and the Chairman of the Committee conducted the enquiry while setting in Peshawar and thus appellant was totally discriminated and condemned unheard.

N. That the order passed and impugn herein caused grave miscarriage of justice to the appellant without solid proof of allegations. The enquiry committee, utterly failed to conduct the enquiry as per procedure laid down in the E&D rules.

O. That the appellant will seek permission of this Hon'ble Tribunal to urge additional grounds at the time of argument of this appeal.

It is therefore most humbly prayed that on acceptance of the instant appeal, this Hon'ble Tribunal may graciously be pleased to set-aside the impugn order No. SO(S/F)E&SED/4-17/2020/Mst. Bibi Razia, Dated, April 16<sup>th</sup>, 2021 issued & signed on 22-04-2021, vide which minor penalty of "Stoppage of one increment for one year" has been imposed, and the same may be declared being illegal, void-ab-initio and of no legal effect and not in accordance with the law OR any other remedy deemed proper and appropriate may also be allowed.

Appellant,

Through

(Farmanullah Khattak),

Advocate Supreme Court, Pakistan.

&

(Haseeb Shah)

Advocate, Peshawar

7

Affidavit.

I, Mst. Bibi Razia EX-District Education Officer (F) Bannu Khyber Pakhtunkhwa, do hereby solemnly declare on oath that the contents of the above Service Appeal as given by me are true and correct to the best of my knowledge and that nothing has been concealed or kept secret from this Hon'ble Tribunal.

Deponent.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU.

No. 6258 / Enquiry

Dated: 15-5- / 2017

The Director Elem: & Secy: Education  
Khyber Pakhtunkhwa,

ENQUIRY REPORT REGARDING CLASS-IV APPOINTMENT

Reference Notification issued under Endst: No. 7893-96 dated; 27-02-2017 where as the designed was nominated as enquiry officer for the subject matter, Therefore necessary enquiry report is submitted as under please.

History of the case:-

One Mr. Khanzada S/O Muhammad Sher Khan Spena Thangi-Patool Khel Domail Bannu made request to the Secretary E&S Education, KPK, that Class-IV posts are sanctioned for newly SDEO(F) Office Domail Bannu. The DEO(F) Bannu appointed Non Local Candidates directly and the local candidates were denied from their due rights.

Method adopted/Investigation

Letter was issued to present DEO(F) Bannu vide letter No.2214 dated, 7-3-2017 and necessary information was collected from her. Copy attached as Annex-A & B

Letter issued to SDEO(F) Domail Bannu vide letter No.2215 dated; 7-3-2017 and her reply was received. Copy attached as Annex-C & D.

Letter was issued to Ex-DEO(F) Bannu (Bibi Razia) vide letter No.3300 dated; 11-04-2017 and statement along with connected documents received, which is Annex as E & F.

Findings/Conclusion

After the perusal of record and from the statements of concerned officers, it was observed that one post of Driver, one post of Naib Qasid and one post of Chowkidar was sanctioned for SDEO(F) Office Domail. The Ex-DEO(F) Bannu appointed the below mention two persons as per detail given below:-

No.	Name	Father name	Appointed against the Post.	Remarks
	Shafiqullah	Zaram Jan	N/Qasid against vacant post at SDEO(F) Office Domail, vide order No.5210-15 dated; 22-09-2016	Related to Tehsil Domail recommendation of Halqa MPA, Tehsil Domail.
	Amer Khan	Sheraz Khan	Chowkidar against vacant post at SDEO(F) Office Domail, vide order No.5210-15 dated; 22-09-2016	Related to Tehsil Bannu and recommendation by Halqa MPA Tehsil Domail.

The attendance list as well as DSC minutes provided by the Ex-DEO(F) Bannu (Annex-as) was thoroughly checked and the following deficiencies were noted given below:-

- 1- The ADEO Estab: DEO(F) Office put her Signature at Attendance list of the candidates not tally with the signature put by her at DSC Minutes.
- 2- The Superintendent (F), DEO(F) Office put his Signature at Attendance list of the candidates was not tally with the signature put by him at DSC Minutes

*Handwritten notes and signatures:*  
 09/4  
 2753  
 TR/...

Annex

Annex 'E'

Annex 'F'

H

(2)

(9)

Page No.02

- 3- The DSC Minutes not signed by the Nominee of the Directorate as nobody was nominated by the quarter concerned.
- 4- The DEO(F) Bannu made DPC on dated; 16-08-2016 in which two class-IV were promoted to J/Clerk post out of 33 % quota and the same minutes was signed by Sher Daraz Khan Nominee of the Directorate.
- 5- The present DSC Minutes were connected by DEO(F) with the pervious minutes, which shows from their separate status.
- 6- The Signature put by ADEO Estab: Female office on the minutes dated: 16-08-2016 also not tally with the class-IV appointment minutes.

Recommendations:-

- 1- The DSC minutes not properly signed by the concerned DSC members.
- 2- The complaint regarding appointment of non local persons related to Tehsil domel is ok to the extent of one Candidate.
- 3- Necessary report is being submitted for further necessary action please.

(Enclosed : 19 pages)

(IMTIAZ UL HAQ)  
ENQUIRY OFFICER  
DISTRICT EDUCATION OFFICER  
(MALE) BANNU

Annex J  
Annex C  
Mr. Arif  
H

(10) Annex-(B)

CHARGE SHEET

1. Muhammad Azam Khau, Chief Secretary Khyber Pakhtunkhwa, as Competent Authority, hereby charge you Mst. Razia Bibi (BS-18) Ex-DEO (F) Bannu now Principal GCHSS Chowkara Karak as follows:

That you while posted as District Education Officer (Female) Bannu committed the following irregularities:

1. You violated the recruitment rules in the appointment of Class-IV and deprived the eligible candidates from their due right.

2. By reasons of the above, you appear inefficient under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & 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 allegations is enclosed.

(Muhammad Azam Khau)  
Chief Secretary  
Khyber Pakhtunkhwa

Mst. Razia Bibi (BS-18),  
Ex-DEO (F) Bannu,  
Now Principal GCHSS Chowkara Karak

11

Annex- B/1

DISCIPLINARY ACTION

Muhammad Azam Khan, Chief Secretary Khyber Pakhtunkhwa, as  
in the opinion of the opinion that Mst. Razia Bibi (BS-18) Ex-DEO (F) Bannu now  
Principal GGHSS Chowkara Karak has rendered herself liable to be proceeded within the  
rules of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline)  
Act, 1973 as she has committed the following acts/ omissions:

STATEMENT OF ALLEGATIONS

1. She violated the recruitment rules in the appointment of Class-IV and  
deprived the eligible candidates from their due right.

For the purpose of inquiry against the said accused with reference to the above  
allegations, an Inquiry Officer/ Inquiry Committee, consisting of the following, is constituted  
under rules 10 (1) (a) of the rules ibid:

1. \_\_\_\_\_
2. \_\_\_\_\_

3. The Inquiry Officer/ Inquiry Committee shall, in accordance with the provisions  
of the rules ibid, 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 other  
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.

(Muhammad Azam Khan)  
Chief Secretary  
Khyber Pakhtunkhwa

Mst. Razia Bibi (BS-18),  
Ex-DEO (F) Bannu,  
Now Principal GGHSS Chowkara Karak



From

Bibi Razia  
Ex- DEO (F) Bannu  
Now Principal  
GGHSS Chokara (Karak)

(12)

Mr. Muhammad Zia Ul Haq  
Special Secretary  
Environment Department  
Khyber Pakhtunkhwa Peshawar.

**SUBJECT: REPLY TO CHARGE SHEET.**

Respected Sir,

In response to the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Office Order No.S.O (S/F) E&SED/4-17/2018 Mst Bibi Razia Ex-DEO (F)/ Bannu dated Peshawar the June 11, 2018 and your office No. PS/S.Secy/FE&WD/inquiry/2018 dated Peshawar the June 20, 2018. It is hereby stated as under.

1. That District Bannu is a very hard kind of District as there is Malikism and domination of few people who are habitual of domination in the offices, especially in education department. The MPA's of this district are habitual of interference and quarrelling with the officers. Not only the MPA's but also the failed candidates being Maliks also put pressure on the officers. Due to which I had to lodge an FIR against one Malik Pakhtunyar in May 2016. (copy attached as Annexure-A). Not only I, but also most of the education officers have either left this district with tears or have gone suspended.
2. That in the above-mentioned conditions the undersigned has tried her best to perform her duty honestly and according to the rules and regulations.
3. That the undersigned is not guilty of violating the existing policy/ rules and regulations in the recruitment of class-IV servants in the office of the SDEO (F) Domail (Bannu).
4. That the undersigned constituted a DSC/DPC committee comprising the following.
  - 1) Mst: Bibi Razia DEO (F) Bannu. Chairperson
  - 2) Mst: Tujza Abbasi ADEO (Estab: F) Bannu. Member
  - 3) Mr. Nauman Ud Din Supdt: Office of DEO (F) Bannu. Member
  - 4) The undersigned wrote letter No. 4084 dated Aug 13, 2016 to the Director E&SE for nomination of a representative of the department (Copy attached as Annexure-A).
5. That Director E&SE nominated Mr. Sher Daraz Khan Wazir, the then Dy: Director P&D as representative of the Department. (Copy attached as Annexure-B)
6. That meeting of DSC and DPC was scheduled on 16-08-2016 in the office of the DEO (F) Bannu.

7. That the said representative did not attend the meeting and gave me a message to complete the minutes of both DSC/ DPC and send to his office by special messenger for signature.
8. That Mr. Shah Muhammad Khan the then MPA and special Assistant to Chief Minister for transport was interested in DPC while Fakhr-e-Azam Wazir the then MPA was interested in DSC and pressing me hard to issue orders immediately. Mr. Sher Daraz Khan also talked me on mobile to issue orders and he will sign the minutes.
9. That I was in a tense situation if orders were to refuse, it was to stand before the guns. So, I issued the orders and sent the minutes by special messenger for the signature of Sher Daraz Khan departmental representative but when he returned the minutes DPC was signed and DSC was unsigned as he by himself showed an interest of the appointment of one candidate while according to policy in the appointment Class-IV consent of Halqa MPA is must which was in the favour of those whom I have appointed. (Copies of DO letters attached as Annexure C&D)
10. That Mr. Sher Daraz Khan who refused to sign DSC may swear by Allah whether he has actually visited Bannu and attended the meeting of DSC and DPC then why did he sign DPC and left DSC unsigned as it was the fear of Shah Muhammad Khan MPA due to which he signed DPC and left DSC unsigned due to his personal interest as he is the inhabitant of the area.
11. That it is quite untrue that members of DSC have not signed the minutes of DSC. There may be some variation in their signature. However, it is their true signature. (Copy attached as Annexure-E)
12. That the complainant Khan Zada S/o Muhammad Sheraz Khan has not applied for the class IV Posts. So his complaint is invalid.

Sir,

I have not willfully violated the rules and have tried my best to act upon the rules and policy though I was in very tense and hard situation due to the pressure of MPA's and Maliks in Bannu, due to which I had to request to my department to transfer me from District Bannu even into a school while I belong to management cadre.

So, I very humbly request your good self to kindly exonerate me and oblige.

Enclosures

1. Detail of Total Number of class IV posts as per budget book (Annexure-F).
2. Copy of existing service rules about class IV (Annexure-G).
3. Advertisement and Employment Exchange cards (Annexure-H).
4. Total number of candidates and attendance sheet (Annexure-I).
5. Notification of DSC (Annexure-J).
6. Minutes of DSC (Annexure-K).
7. Appointment order (Annexure-L).

NO: 1642

23/06/2018

Yours Obediently

Bibi Razia Ex DEO (F) Bannu  
Now Principal GGHSS Chokara  
Karak.

Principal  
G.G.H.S.S Chokara  
(Karak)

(انوائس رپورٹ)

14



GOVERNMENT OF KHYBER PAKHTUNKHWA  
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

NO. PS/S. Secy/FE&WD/Inquiry/2018

Dated Peshawar the, 02<sup>nd</sup> November, 2018 /11704-

To

The Secretary to Govt: of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Deptt:  
Peshawar.

Attention: - Section Officer (Schools Female)

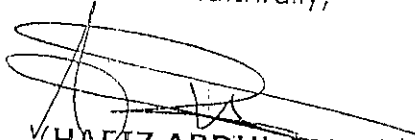
Subject: - INQUIRY AGAINST MST. RAZIA BIBI, EX-DISTRICT EDUCATION OFFICER (FEMALE), BANNU NOW PRINCIPAL GGHSS CHOWKARA DISTRICT KARAK

Dear Sir,

I am directed to refer to your office order No: SO<sup>4</sup> (S/F)E&SED/4/17/2018/Mst, Bibi Razia/Ex-DEO (F)/Bannu, dated 11<sup>th</sup> June, 2018 on the subject captioned above and to enclose herewith inquiry report conducted by Muhammad Zia ul-Haq (PAS BS-19), Special Secretary, Forestry Environment & Wildlife Department Khyber Pakhtunkhwa/Convener of Inquiry Committee and Mst. Rana Jabeen, Senior Instructor, RITE (F) Bannu/Member of the Inquiry Committee under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011 against Mst. Razia Bibi Ex-DEO (Female), Bannu, now Principal GGHSS Chowkara District Karak containing eight (08) pages alongwith its enclosures from Flag-A to Flag-X for further necessary action at your end, please.

Encl: As above

Yours faithfully,

  
(HAFIZ ABDUL JALEEL)  
SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded for information to:-

- 1) Mst. Rana Jabeen, Senior Instructor, RITE (F) Bannu/Member of the Inquiry Committee.
- 2) Section Officer (Schools Female), Elementary & Secondary Education Department Khyber Pakhtunkhwa.
- 3) PS to Special Secretary, FE&W Department, Khyber Pakhtunkhwa.

SECTION OFFICER (ESTT)

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S & S (F)  
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8  
07/11  
Asst

(انوائری رپورٹ)

(18)

(15)

(15)

INQUIRY REPORT AGAINST MST. BIBI RAZIA (BS-18) EX.DEO(F),  
BANNU NOW PRINCIPAL GGHSS CHOWKARA, DISTRICT KARAK  
UNDER KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS  
(E&D) RULES 2011

In compliance with the approval of the Competent Authority and Elementary & Secondary Education Department, Govt: of Khyber Pakhtunkhwa Office Order bearing No.SO(S/F)E&SED/4-17/2018/Mst Bibi Razia/Ex DEO(F) Bannu, dated 11.06.2018 (Flag-A), containing instructions to conduct a formal inquiry against Mst Bibi Razia, Ex-DEO (Female), BS-18, District Bannu presently serving as Principal Govt: Girls Higher Secondary School Chowkara, District Karak into the charges of illegal appointments of Class-IV already elaborated in the fact finding Inquiry Report conducted by Mr.Imtiaz-Ul-Haq, the then District Education Officer (Male) Bannu (Flag-B).

BACKGROUND / HISTORY.

A meeting of the DSC / DPC was called on 16-08-2016 in the office of District Education Officer (Female) Bannu for recruitment of class-IV employees in various Schools of District Bannu as well as promotion of two class-IV to the post of Junior Clerk in the said DEO(F) office. From perusal of the minutes of the DSC 32 candidates were recommended against different posts of class-IV in various Schools out of 39 candidates in District Bannu (Flag-C). Appointments orders of 32 recommendee candidates were issued by the DEO(F) Bannu vide office orders (Flag-D-1 to D-26).

Responding to the complaint of Mr. Khanzada S/O Muhammad Sher Khan resident of Spena Thang, Patool Khel, Tehsil Domail District Bannu which was submitted to the office of Secretary E&SE Department, against the allegations of appointments of non local candidates as Class-IV by the then DEO (Female), District Bannu, the Competent Authority appointed Muhammad Zia-ul-Haq (PAS-BS-19) Special Secretary Forestry, Environment and Wildlife Department and Mst. Rana Jabeen Senior Instructor (BS-19) RITE (F) Bannu as inquiry committee under Govt. of Khyber Pakhtunkhwa civil servant (Efficiency & Discipline) Rules, 2011 and a

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Charge Sheet (Flag-E) and Statement of Allegations(Flag-F) was served upon the accused officer.

**CHARGE:**

She violated the recruitment rules in the appointments of class-IV and deprived the eligible candidates from their due right.

**PROCEDURE.**

In order to provide an ample opportunity of personal hearing as well as submission of written statement in isolation, the departmental representative and the accused officer were asked vide letter dated 20-06-2018, to appear before the Inquiry Committee on 26-06-2018 in the office the Special Secretary Forestry, Environment & Wildlife Department and to defend / exonerate herself from the charges leveled upon her / provision of record by the Departmental Representative (Flag-G). Mst.Dilshad Begum Deputy Director (Estt) Directorate of E&SE, Khyber Pakhtunkhwa, Peshawar attended the Inquiry Proceedings as Departmental Representative. She submitted necessary documents relates to the subject Inquiry which is available at Flag-H.

The accused officer also attended office of the Special Secretary Forestry, Environment & Wildlife Department Khyber Road Peshawar (Convener of the Inquiry Committee) on 26-06-2018 (Flag-J). She submitted her written reply which is reproduced as bellow (Flag-K):

**REPLY OF THE ACCUSED:**

- Handwritten signature*
- 2-7-18
1. That District Bannu is a very hard kind of District as there are Malikism and domination of few people who are habitual of domination in the offices, especially in education department. The MPA's of this district are habitual of interference and quarrelling with the officers. Not only the MPA's but also the failed candidates being Maliks also put pressure on the officers. Due to which I had to lodge an FIR against one Malik Pakhtunyar in May 2016. (copy attached as Annexure-A). Not only I, but also most of the education officers have either left this district with tears or have gone suspended.
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2. That in the above-mentioned conditions the undersigned has tried her best to perform her duty honestly and according to the rules and regulations.
3. That the undersigned is not guilty of violating the existing policy/ rules and regulations in the recruitment of class-IV servants in the office of the SDEO (F) Domail (Bannu).
4. That the undersigned constituted a DSC/DPC committee comprising the following.
  - 1) Mst: Bibi Razia DEO (F) Bannu. Chairperson
  - 2) Mst: Tujza Abbasi ADEO (Estab: F) Bannu. Member
  - 3) Mr. Nauman Ud Din Supdt: Office of DEO (F) Bannu. Member
  - 4) The undersigned wrote letter No. 4084 dated Aug 13, 2016 to the Director E&SE for nomination of a representative of the department (Copy attached as Annexure-A).
5. That Director E&SE nominated Mr. Sher Daraz Khan Wazir, the then Dy: Director P&D as representative of the Department. (Copy attached as Annexure-B)
6. That meeting of DSC and DPC was scheduled on 16-08-2016 in the office of the DEO (F) Bannu.
7. That the said representative did not attend the meeting and gave me a message to complete the minutes of both DSC/ DPC and send to his office by special messenger for signature.
8. That Mr. Shah Muhammad Khan the then MPA / Special Assistant to Chief Minister for Transport & Mass Transit Department was interested in DPC while Fakhr-e-Azam Wazir the then MPA was interested in DSC and pressing me hard to issue orders immediately. Mr. Sher Daraz Khan also talked me on mobile to issue orders and he will sign the minutes.
9. That I was in a tense situation if orders were to refuse, it was to stand before the guns. So, I issued the orders and sent the minutes by special messenger for the signature of Sher Daraz Khan Departmental Representative but when he returned the minutes DPC was signed and DSC was unsigned as he by himself showed an interest of the appointment of one candidate while according to policy in the appointment Class-IV consent of Halqa MPA is must which was in the favour of those whom I have appointed. (Copies of DO letters attached as Annexure C&D).

*Attest*

*[Signature]*

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10. That Mr. Sher Daraz Khan who refused to sign DSC may swear by Allah whether he has actually visited Bannu and attended the meeting of DSC and DPC then why did he sign DPC and left DSC unsigned as it was the fear of Shah Muhammad Khan MPA due to which he signed DPC and left DSC unsigned due to his personal interest as he is the inhabitant of the area.
11. That it is quite untrue that members of DSC have not signed the minutes of DSC. There may be some variation in their signature. However, it is their true signature. (Copy attached as Annexure-E)
12. That the complainant Khan Zada S/o Muhammad Sheraz Khan has not applied for the class IV Posts. So his complaint is invalid.

On receiving of different statements of the members of the DSC and refusing their attendance / signatures the accused officer submitted her rejoinder statement (Flag-L) during the next date inquiry proceeding on 11-07-2018 which is reproduced bellow:-

1. Mr. Sher Daraz Khan Ex Dy: Director Now DEO (M) Bannu who was nominated as Departmental Representative by Director E & SE KP Peshawar, did not attend the meeting physically at Bannu but issued me instructions and orders on his mobile which I have stated in my preliminary statement. I informed him regarding the whole process and worked out agenda through mobile conversation. He ordered me to issue the appointment and promotions orders and send him the working papers by special messengers. According to his instruction and orders I issued the orders and sent him the working papers by the hands of office officials Mr. Sheraz Khan Driver and Siffat Ullah Daftari.
2. Mr. Sher Daraz Khan was interested in a person as he is the inhabitant of Bannu District and wazir tribe, when he did not find the person of his interest in the appointment order, he signed the DPC and left the DSC unsigned. He dodged me and did not attend the meeting physically, then why did he sign the papers of DPC while meeting for both DPC and DSC was held on one and the same day and venue.
3. That as Mr. Sher Daraz Khan is now working as D.E.O (M) Bannu and Nauman-u-Din is the resident of Bannu and indirectly subordinate to him. So Nauman-u-Din has refused his signature, while he had put his signature on both the DPC and DSC
4. Furthermore it is also stated for your kind information that the class IV under objection Mr. Amir Khan Chowkidar has now been transferred by the present D.E.O (F) Bannu to her office. (Transfer Order Copy attached)

*[Handwritten signature]*

*[Handwritten signature]*

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In this connection minutes of the DSC dated 16-08-2016 was sent to the District Education Officer (F) Bannu for verification and authentication vide letter dated 08-08-2018 (Flag-M). The DEO(F) Bannu replied that the specimen signature was been received from Mr. Nauman ud Din Superintendent of the local office. Although this department has no such mechanism or Lab; to check the authentication of the signatures but the undersigned observed observed with vigilance eyes and found little bit resemblance in the middle of the signatures. It is also pointed out that there is also dissimilarity in some parts of his provided specimen signatures (Flag-N).

**CROSS EXAMINATION:**

To ascertain and authenticate the minutes of the DSC dated 16-08-2016 as well as knowing of reasons regarding non attendance of representative of the Directorate of E&SE Khyber Pakhtunkhwa namely Mr. Sher Daraz Khan the then Deputy Director (P&D) along with other members of the DSC were summoned on 11-07-2018 vide letter dated 05-07-2018 (Flag-O). They attended the inquiry proceedings (Flag-P) and submitted their written statements. The committee also made cross examination / questions from the members of the DSC.

Mr. Sher Daraz Khan Ex. Deputy Director (P&D) Directorate of E&SE Khyber Pakhtunkhwa presently working as DEO (M), Bannu has submitted that he was nominated as Representative from the Administrative Department by the Director E&SE for meetings of the Departmental Promotion Committee (DPC) as well as Departmental Selection Committee (DSC) fixed on 16-08-2016 in the office DEO(F), Bannu, but he not attended the DSC meeting on the same date.

From perusal of his written statement during the hearing he stated that his nomination for the DPC/DSC in District Bannu is concerned he has signed the minutes of DPC and strictly rejected the attendance in DSC with the reason that he belongs to that Tehsil i.e. Domail for which the DSC was doing, thus the DSC in my presence can be partial. He also stated that his signature on DSC minutes is fake (Flag-Q).



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The Inquiry Committee observed that the main role in the DSC is of the representative of the Administrative Department i.e. Directorate of E&SE however Mr. Sher Daraz Khan who was supposed to ensure adherence to the law, rules and policy of the Government. He could not produce any reply to the Directorate of E&SE in black & white regarding non attendance of the DSC in Bannu. The Departmental Representative of Directorate of E&SE in the subject Inquiry also stressed that no correspondence regarding refusal of attendance in the selection process in Bannu by the said member are available on the record of Directorate E&SE.

The role of the said member become doubtful as one side he signed the minutes of the DPC regarding promotion of Class-IV to the post of J/Clerk on 16-08-2016 and other side he had not attended the selection process for appointments of Class-IV on the same date, as the Director E&SE has nominated the said officer for both the meetings on the same date and venue as per statement of Departmental Representative, as well as standing orders of the Department.

The 2<sup>nd</sup> member of the DSC namely Mr. Nauman-ud-Din the then Supdt: DEO(F) office Bannu presently posted as B&AO (F) Bannu, also signed the minutes of the DSC held on 16-08-2016, however he submitted his written statement during the Inquiry Proceedings which is reproduced as "I have seen my signature put up on DSC meeting papers, the same are not my signature, because I have not attended the said meeting regarding the appointment of class-IV servant. I have not been informed regarding this issue by my boss. No doubt, I was at that time posted against the post of superintendent but the meeting papers were not seen by me, even the whole process has been made by the then DEO(F) Bannu herself (Flag-R).

The 3<sup>rd</sup> member of the DSC namely Mst. Tujza Abbasi, due to engagement in the General Election-2018 duty could not attend the inquiry proceeding on 11-07-2018 (Flag-R), therefore she was again summoned on 16-08-2018 vide call letter dated 08-08-2018 (Flag-S). She submitted her written statement in which she refused that she did not attend the said DSC meeting nor she was invited for the meeting. She also clarified that her signature affixed on the minutes of DSC is not my original signature but fake. She also provided her specimen signature for perusal of the inquiry committee. (Flag-T)

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**FACTS:**

According to the second proviso to sub-rules (2) of Rule 10 of the Khyber Pakhtunkhwa APT Rules 1989, appointments in basic pay scale 3 to 5 shall be made on the recommendations of the Departmental Selection Committee through the District Employment Exchange concerned at Flag-U. However coddle formalities laid down in the subject issue have not fulfilled.

Further more in term of the sub-para 2 of the decisions / directives of the Chief Minister Khyber Pakhtunkhwa held in the meeting on 26-01-2015 which was further circulated to the E&SE Department reveals that the Education Department will ensure appointments of Class-IV from the concerned constituency on the recommendations of MPA instead of outsiders. Up gradation of schools to be considered as per share of all MPAs at flag-V. However the MPA concerned recommended out sider candidate to his constituency which deprived the local candidates of their right.

In the instant case both the Class-IV employees namely Mr.Shafiullah Khan s/o Zaram Jan and Mr. Amer Khan s/o Sheraz Khan (Flag-W) were appointed by the accused officer on the recommendations of Mr.Fakhr-e-Azam Wazir Ex.MPA PK-71 Bannu as well as through Employment Exchange of Bannu District. However the MPA concerned recommended one candidate Mr. Amer Khan s/o Sheraz Khan of Tehsil Bannu against the post of Chowkidar in Tehsil Domail i.e in his constituency (Halqa).

The accused officer belongs to District Karak. She also submit a copy of FIR No. 47 dated 31-01-2017 regarding attack of 10 / 12 youths on the office of DEO(F) Bannu and pressurizing the DEO(F) Bannu for illegal appointment of a PTC female teacher at Flag-X....

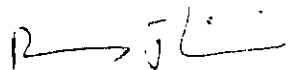
**FINDINGS / CONCLUSIONS:**

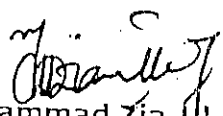
From perusal of the record, reply of the accused, statements of the members of the DSC, cross examination and discussion, the following findings / conclusions were arrived:

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- i. The charge regarding violation of the recruitments rules in the appointments of class-IV and depriving the eligible candidates from their due rights "stands proved" against the accused officer as no proper procedure according to the recruitment policy of the Provincial Government have been adopted. No call letters were issued to the candidates, nor the DSC meeting held for the recruitments as all the members of the DSC denied their presence and declared their signatures as fake.
- ii. Disciplinary action may be taken under E&D Rules 2011 against Mr. Sher Daraz Khan the then Deputy Director (P&D) Directorate of E&SE presently serving as DEO(M) Bannu as his role become doubtful as on one side he signed the minutes of the DPC regarding promotion of Class-IV to the post of J/Clerk while on 16-08-2016 on other side he had not attended the selection process for appointments of Class-IV on the same date, as the Director E&SE has nominated the said officer for both the meetings on the same date and venue, which comes to the domain of misconduct.
- iii. Disciplinary action may be taken against all the 32 appointees /officials in terms of Rule-2 (1)(L)(vi) under the heading "misconduct" of Khyber Pakhtunkhwa E&D Rules, 2011, as their appointments were made without observance of laid down procedure / DSC.

  
 Mst. Rana Jabeen  
 Senior Instructor  
 RITE(F) Bannu.  
 MEMBER

  
 Muhammad Zia-Ul-Haq (PAS)  
 Special Secretary  
 Forestry, Env't, & Wildlife Department  
 CONVENER

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## SHOW CAUSE NOTICE

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I, Mehmood Khan, Chief Minister Khyber Pakhtunkhwa, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Mst. Bibi Razia (BS-18) Ex-DEO (Female) Bannu now Principal GGHSS Chowkara Karak, as follows:

- a. You violated recruitment rules in the appointments of Class-IV, thus depriving eligible candidates from their due right.

I am satisfied that you have committed the act of "Miss-conduct/ In-efficiency" as specified in Rule-3 of the said rules.

In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

As a result, thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty(s) under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

- i. Impulsory Retirement
- ii. \_\_\_\_\_

You are, thereof, required to show cause as to why the aforesaid penalty/ penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this notice is received within seven days or not more than fifteen days of its delivery, in the normal circumstances, 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.

A copy of the findings of the fact-finding inquiry is enclosed.

**ATTESTED  
TO BE TRUE COPY**

(MEHMOOD KHAN)  
CHIEF MINISTER KHYBER PAKHTUNKHWA  
COMPETENT AUTHORITY

Mst. Bibi Razia (BS-18),  
Ex-DEO (Female) Bannu,  
Now Principal GGHSS Chowkara Karak,  
(Accused)

To,

The Chief Minister,  
Government of Khyber Pakhtunkhwa,  
Peshawar.  
(Competent Authority)

Through:- PROPER CHANNEL.

Subject:- REPLY TO THE SHOW CAUSE NOTICE.

Respected Sir,

With due respect and humble submission, I, the undersigned, Bibi Razia, Ex-DEO (Female) Bannu received captioned show cause notice on 10/12/2019 and do hereby submit my reply to the charge mentioned therein as under:-

1. Total 39 candidates applied for the available posts amongst which 10 were against 25% retired servants son/daughters quota and 27 applied in open merit against the newly created posts in the newly established schools (Annexure-I) and only 2 candidates were to be appointed against the newly created posts in office of SDEO (Female) Domel (District Bannu) (Annexure-II).
2. The posts were internally advertised amongst all concerned (Annexure-III). The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar was requested to nominate a representative of his office for the meeting of DPC/DSC to be held on 16/8/2016 in the office of DEO (Female) Bannu (Annexure-IV), who nominated Mr. Sher Daraz Wazir, Deputy Director (P&D), as his representative (Annexure-V).
3. The meeting of DPC/DSC was accordingly held on 16/8/2016 in the office of the undersigned wherein two class-IV employees of the office were cleared for the promotion to the posts of Junior Clerk against 33% quota prescribed by the government (Annexure-VI).

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13/12/19

4. Besides the above, 09 candidates amongst the 10 applied for appointment against 25% quota for retired persons sons/daughters were also cleared whereas one was absent hence dropped (**Annexure-VII**).
5. Amongst the remaining candidates 05 were absent and 22 were appointed on open merit in the newly established schools from amongst the kith and kins of land donors as per the usual routines.
6. Only 02 candidates namely, **Shafiullah S/O Zaram Jan and Amer khan S/O Sheraz khan** were appointed afresh against open merit quota for the posts created in the office of SDEO (Female) Domel (**Annexure-VIII**).

The issue raised as a charge against the undersigned in the instant case is appointment of the said two persons for obvious reasons.

7. Mr. Sher Daraz, the then Deputy Director (P&D) representative of Director Elementary and Secondary Education signed the DPC minutes only and refused to sign the minutes of the DSC on the plea that since he belongs to Tehsil Domel and the office posts belong to his area, he therefore not signed the minutes as representative whereas the fact is that he was compelling the undersigned to appoint one of his candidate against one post amongst the two but the undersigned showed her inability to consider a candidate who had not applied for the post. One other person namely Noor Alam Wazir, the then Budget Officer, Elementary & Secondary Education Department, Peshawar was also stressing upon to appoint one of his person against one of the post amongst the two. Obviously it was not possible for the undersigned so they both started a campaign against me to malign me for the so-called charge that (**Annexure-IX**).

"You violated recruitment rules in the appointment of class-IV, thus depriving eligible candidates from their due right".

8. It may be pointed out that no rules have been indicated which have been violated by the undersigned nor the names of the eligible candidates who

have been deprived from their due rights. Moreover, the so-called complainant namely Khanzada S/O Mohammad Sher Khan, resident of Speena Tangi Patool Khel, Tehsil Domel, District Bannu has allegedly submitted this complaint to the Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar which has not been made available neither to the enquiry committee nor the undersigned which was based for the instant enquiry claiming that the undersigned appointed a non-local person against different posts of Class IV. Again names of the so-called non-locals have not been mentioned.

9. Attention is drawn that in terms of S&GAD circular letter No SOR-II (S&GAD) 5(29)/97-II dated 22/7/1998 (S:No-3 page-206 of the ESTA-Code of Establishment Department, 2012) (**Annexure-X**), "the complainant while submitting a complaint against a civil servant, he should be asked to furnish an affidavit to the effect that all the facts stated in his complaint are true, and if his affidavit is proved false, he would be prepared to face legal actions which would be taken against him". Thus requirements of the policy instructions have not been fulfilled.
  10. Moreover, one of the member of the Enquiry Committee **Mst. Rana Jabeen Wazir Instructor**, RITE (Female) Bannu belongs to Tehsil Domel and she cannot be a neutral observer of the fact. Mr. Sher Daraz Wazir and Noor Alam Wazir managed to include her in the committee.
  11. Above all, the undersigned has not deviated from any rule as according to the 2<sup>nd</sup> proviso of Rule-10 (b) of the KPK, Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 (**Annexure-XI**), that "appointment to posts in BPS 1-4 shall be made on the recommendations of DSC, through the District Employment Exchange concerned" which has been duly done in the instant case (**Annexure-XII / 1-2**).
  12. Besides, in terms of Rule-12 (2) of the rules *ibid* (**Annexure-XIII**), "Initial Appointment to posts in BPS 3-15 born on Divisional or District cadre shall be made from amongst Bonafide residents of the Division or District concerned, as the case may be."
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There is no provision in the rules for Tehsil based appointment. From the impugned two appointees, one belong to Bannu while the other to Domel and have been appointed on merit as such no eligible candidates have been deprived. Besides, the complainant mentioned above had not applied for the posts.

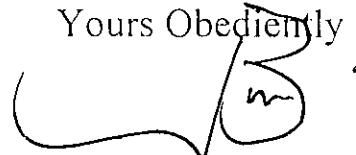
In view of the above, it is clearer than crystal that the so-called charge of deviation by the undersigned from the rules in making appointments of the said two candidates is baseless, false and unfounded and liable to be set aside.

It is therefore requested that the undersigned may please be exonerated from the aforesaid baseless charges and the service career of the undersigned may please be saved from the concocted, malafidely fabricated conspiracies of the ill wishers of the undersigned.

It is requested that the undersigned may please be allowed an opportunity of personal hearing.

Dated: 13/12/2019

Yours Obediently



**(Bibi Razia)**

Ex- DEO (Female) Bannu

Now Principal GGHSS Chokara Karak

*Principal*  
Govt. Girls Higher Secondary School  
Chokara, Distt. Karak





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**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**

Dated Peshawar the November 04<sup>th</sup>, 2020

**NOTIFICATION**

**NO. SO(S)/E&SED/4-17/2019/Bibi Razia**: WHEREAS Mst. Bibi Razia (MC BS-18), the then DEO (F) Bannu, now Principal, GGHSS Chokara, Karak was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 due to violation of recruitment rules in the appointments of Class-IV employees and depriving the eligible candidates from their due right.

2. **AND WHEREAS** Mr. Zia ul Haq (PAS BS-19), the then Special Secretary Environment Department and Mr. Rana Jabeen (TC BS-19) Senior Instructor, RITE (F) Bannu conducted formal inquiry against the accused.

3. **AND WHEREAS** the inquiry committee after having examined the charges, evidence on record and explanation of the accused, submitted the report.

4. **AND WHEREAS** major penalty of "compulsory retirement from service" was tentatively imposed upon the accused by the competent authority (Chief Minister, Khyber Pakhtunkhwa).

5. **AND WHEREAS** Secretary Relief, Rehabilitation & Settlement Department afforded personal hearing to the accused on behalf of Competent Authority on 24.09.2020.

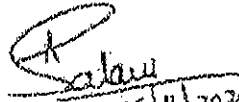
6. **NOW, THEREFORE**, in exercise of the powers conferred under Rule-14 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister) is pleased to impose the penalty of "withholding of one increment for one year" upon Mst. Bibi Razia, (MC BS-18), the then DEO (F) Bannu now Principal, GGHSS Chokara, Karak with immediate effect.

**SECRETARY**

**Endat: of Even No. & Date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
3. District Education Officer (Female) Karak.
4. District Accounts Officer, Karak.
5. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. PS to Chief Secretary, Khyber Pakhtunkhwa.
7. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
8. Mst. Bibi Razia (MC BS-18), Principal, GGHSS Chokara, Karak.
9. Master File.

  
16/11/2020  
(ABDUS SALAM)  
SECTION OFFICER (S/T)

APPEAL OF BIBI RAZIA EX-DEO (FEMALE) BANNU AGAINST  
PENALTY OF STOPPAGE OF ONE INCREMENT FOR ONE YEAR  
VIDE GOVERNMENT OF KHYBER PAKHTUNKHWA SECRETARY  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
NOTIFICATION NO. SO(S/F)E&SED/4-17/2019/BIBI RAZIA DATED  
PESHAWAR THE NOV 04<sup>th</sup>, 2020.

To,

The Honourable chief Minister  
Khyber Pakhtunkhwa, Peshawar

Respected Sir,

With due respect and humble request the undersigned put forth the following points in the case in which penalty of "stoppage of one increment for one year" has been imposed upon the undersigned vide Government of Khyber Pakhtunkhwa Secretary Elementary & Secondary Education Department Notification No. SO(S/F)E&SED/4-17/2019/Bibi Razia dated Peshawar the Nov 04<sup>th</sup>, 2020. (Annexure-A).

1. The enquiry proceeding initiated against me was based on complaint from a synonymous so-called complainant one Mr. Khanzada S/o Muhammad Sher Khan of Domel, Bannu, claiming that the recruitment rules were violated by me in appointment of class-iv employees against two posts of Naib Qasid and Chowkidar in the office of SDEO (Female) Domel, Bannu without indicating as to which rules have been deviated from and whose particular eligible candidate has been deprived. It may also be pointed out that during this entire proceeding, no such complaint came to notice. Only the complainant has been mentioned here and there. No copy thereof is available on record (Annexure-B).

2. While submitting the so-called fake complaint to the Chief Secretary Khyber Pakhtunkhwa recommending disciplinary action against me, the Director of Elementary and Secondary Education and Education Secretariat altogether ignored the policy instructions contained in S&GAD circular letter No. SOR-II(S&GAD)5(29)97-II, dated 22.07.1998 (S.No.3 page -207 of the P.S.A. Code of

Establishment Department 2012 (Annexure-C) where under it is mandatory that "the complainant while submitting a complaint against a civil servant, he should be asked to furnish an affidavit to the effect that all the facts stated in his complaint are true, and if his affidavit is proved false, he would be prepared to face legal actions which would be taken against him" these requirements of the policy instructions have not been followed by the directorate and Secretariat of Elementary and Secondary Education and I have been subjected to disgrace, mental torture and agony since 2016 till date.

3. Attention is drawn to the fact that the so-called complainant was neither candidate of any post as he did not apply for any post nor he was representative of the area. His complaint was entertained despite of the fact that it was not fulfilling the requirements of the policy Instructions.
4. Moreover he was neither called by any of the enquiry officer/committee to put forth his point of view. Even DEO (Male) Bannu blindly Okayed his complaint which is an ample proof of the fact that it was an extensive concocted plot against me as I have not fulfilled the illegal demands of certain influential persons and stood courageously against their illegal pressure.
5. The DEO (Male) Bannu, in the capacity of preliminary enquiry officer, concluded that (Annexure-D).
  - I. The signatures of ADEO (Establishment) DEO (Female) office not tally in the list of candidates and DSC minutes.
  - II. Similarly, the Superintendent of DEO (Female) office Signatures also not tally in these both documents.
  - III. The DSC minutes not signed by the nominee of the Directorate as nobody was nominated by the quarter

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- concerned. Complaint regarding appointment of non-local persons Tehsil Domel is ok to the extent of one candidate.
6. If the signatures of the ADEO (Female) and Superintendent of DEO (Female) office do not tally, the undersigned cannot be held responsible as no chairperson of any meeting at any level tally the correctness or otherwise of the signatures of the participants and are never scrutinized as to whether these are genuine or not while the signatures were actually put by the concerned on the spot.
7. It is wrong on the part of preliminary enquiry officer that nobody was nominated by the quarter concerned (Directorate of Education). It is an obvious proof of the fact that while preparing a report, no heed as given to my letter addressed to Director Education on 13/08/2016 (Annexure-E) wherein he was requested to nominate a member for the meeting of DPC/DSC to be held on 16/08/2016.
8. The Director of Education in response nominated Mr. Sher Daraz Deputy Director (P&D) of that office to participate in the meeting of DSC/DPC (reference is made to letter of Director Education dated 15/08/2016) (Annexure-F).
9. According to the findings and recommendations to the enquiry committee in Para-7(5) and Para-9(i) held that the role of Mr. Sher Daraz, the then Deputy Director (P&D) Education Directorate Peshawar now DEO (Male) Bannu was doubtful as he was nominated for both the meetings of DPC and DSC but he signed the minutes of DPC and refused to sign the DSC minutes. He may be proceeded against as the Director Education had nominated him for both the meetings. However, no action has so far been taken against him whereas according to my firm conviction he is the main figure behind the whole

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meaneouring to depose me from the post of DEO (Female) and my conviction proved correct that immediate after the meetings of DSC and DPC, instead of proceedings against him under the law, he was posted as DEO (Male) Bannu and given dual charge of the post of DEO (Female) also, so that he could prevail upon the other two members of the DSC and muddle the Situation to save his own skin and to punish me for not obeying his legal orders to appoint his candidate who had never been applied for the post.

10. Since, the undersigned was straightforward and did her duties with utmost honesty, so most of the influential Maliks, MPAs and these officers like Sher Daraz were striving hard to oust and depose me from the post. Resultantly for a long period of 4 years, I being an officer of Management cadre have been placed against teaching post without a slightest wrong on my part.
11. In this connection, it may be mentioned that vide Notification of S&GAD dated 17/06/1989 (Annexure-G), the DPC and DSC for filling the posts by promotion and initial recruitment are the same so for the members and proceedings are concerned and as such the meetings of DPC and DSC are held simultaneously and it has been routine that in a meeting of DPC/DSC held on the same date must be participated by the members concerned without a break/pause. So all statement of the members that they participated the meeting of DPC but not the DSC are absolutely wrong and no proper investigation was made by the preliminary and formal enquiry committee by asking the members to give statements on oath to the effect that they are true in not attending DSC meeting and the DEO had dared to proceed the meeting and prepared a bogus minutes unilaterally.

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- 12. Besides, the enquiry committee could call for the concerned candidates appeared before the DSC and get their statements on oath whether these two persons ADEO (Female) and Superintendent of DEO (Female) were present in the DSC meeting or not. But nobody bothered to do so.
- 13. In terms of Rule-10(6) 5 Proviso page-18 of the ESTA-code (Annexure-H), appointment to posts in BPS-1 to 4 shall be made on the recommendations of the DSC through the District Employment Exchange concerned, or where in a District the office of Employment Exchange does not exist, after advertising the posts in the leading newspapers. In the instant case the appointments have been recommended by the DSC through Employment Exchange (Annexure-I1, I2). Internal advertisement was also made (Annexure-J). Besides, both candidates in question were recommended by the MPA concerned of Domel, Bannu (Annexure-J1, J2).
- 14. Besides, under Rule-12(2) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Transfer and Promotion) Rules, 1989, initial recruitment in Basic Pay Scales 3-15 born on Divisional or District cadre shall be made from amongst Bonafide residents of the Division or District concerned (page-20 of ESTA-code) (Annexure-K). There is no mention of Tehsil cadre anywhere in the rules. So it is absolutely wrong and misleading stance that appointments are made in the Domel from Bannu is of non-locals. All the posts in BPS-3 to 15 in the District are transferable amongst the Tehsil of a District being District cadre. So no deviation from any rules has been made. Rather the rules have been complied with in letter and spirit. It may be mentioned that the appointment orders issued by other districts (e.g) by DEO (Female) Lakki Marwat appointment order No. 2797-2805, dated 03/08/2016 contained

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- appointment of Mr. Muhammad Sadiq of Menakhel Lakki. Marwat city has been appointed against the posts of Naib Qasid in Tehsil Serai Naurang (Annexure-L).
15. At may be mentioned that total 39 candidates (Annexure-M) applied for various class-iv posts, in District Bannu including Tehsil Domel. Amongst these 39 posts:
- I. 10 posts fall within the 25% quota of retired class-iv sons amongst which only 9 applied who were appointed.
  - II. 27 posts fall were created in the newly established schools from amongst 27 candidates, 5 were absent and 22 were appointed from amongst the kith and kins of the land owners as per policy of the Government.
  - III. Only two posts were meant to be filled in directly by initial recruitment. Mr Shafiullah S/o Zaram Jan and Mr. Amer Khan S/o Sheraz Khan were appointed against open merit through District Employment Exchange (Annexure-N). Both these candidates were also recommended by the MPA concerned namely Fakhre Azam Wazir who belong to Domel (Annexure J1, J2).
16. Mr. Sher Daraz, the then Deputy Director (P&D) representative of Director elementary and Secondary education signed the DPC minutes only and refused to sign the minutes of the DSC on the plea that since he belongs to Tehsil Domel and the office post belongs to his area, he therefore not Signed the minutes as representatives whereas the fact is that he was compelling the undersigned to appoint one of his candidate against one post among the two but the undersigned showed her inability to consider a candidate who had not applied for the post. One other person namely Noor Wazir, the then Budget Officer, Elementary & Secondary education

Department, Peshawar was also stressing upon to appoint one of his person against one of the post amongst the two. Obviously it was not possible for the undersigned so they both started a campaign against me to malign me for the so-called charge that you violated recruitment rules in the appointment of class-IV, thus depriving eligible candidates from their due right.

17. It may be pointed out that District Bannu is a hard station for the Civil Servants, particularly for education staff officers posted in District Bannu as Malikism is dominant there and some of them are habitual to pressurize the officers to do illegal tasks for them. Not only the MPAs but the failed candidates also pressurizing them to do any wrong for them.

18. In my case one Malik Pakhtunyar pressurized me to release pay and allowances of a chowkidar, for 17 years who remained absent for 19 years. In 2014, he somehow re-instated him but with immediate effect. The remaining 17 years absence in 2014 passed was without pay for which he pressurized me to release his pay and allowances for the last 17 years absence. Obviously it was neither my competency to do so nor I had any logic to submit the case upward as that case was not covered under any law. He along with his body guards assaulted me and my son who was also with me as driver on our way to my home from office and threatened us to death. I lodged an FIR against him on that very date and time but no action so far has been taken against his despite lapse of 4 years (Annexure-O). It was not only me but many others suffered a lot and left Bannu with tears and disgracement. Even my successor DEO (Female) Bannu faced such situation which compelled her to lodge FIR on 31/01/2017 (Annexure-P). It is a proved fact that the present case was initiated against the undersigned on the malafide

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36

intention and conspiracy of the influential officers and their sponsors in elite circles.

So, it is requested to kindly exonerate the undersigned in the present case as due to the present case I have been suffered a long for the last 04 years being deferred from promotion to BPS-19 in the DPC dated 17-05-2019 and also working in a school w-e-f 01-10-2016 inspite of the fact that I belong to management cadre. So, very humble requested for exoneration to proceed my file for promotion to BPS-19

Thanking you in anticipations



Yours Obediently

**BIBI RAZIA**

Ex-DEO (Female) Bannu

Now Principal

GGHSS Chokara (Karak)

Dated: 20-11-2020

**ATTESTED  
TO BE TRUE COPY**



(37)  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(S/F)E&SED/4-17/2020/Mst. Bibi Razia  
Dated Peshawar the April 16<sup>th</sup>, 2021

To ✓  
Mst. Bibi Razia,  
Ex-DEO BANNU,  
Now Principal GGHSS Chokara, Karak.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE PENALTY IMPOSED UPON  
MST. BIBI RAZIA (BS-18) EX-DEO (F) BANNU NOW PRINCIPAL GGHSS  
CHOKARA, KARAK**

I am directed to refer to your appeal, dated 02.12.2021 on the subject and to inform that the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) has been pleased to regret your appeal, being devoid of merits.

  
(FAWAD KHATTAK)  
SECTION OFFICER (S/F)

Copy of the above forwarded to:

1. Director E&SE, Khyber Pakhtunkhwa, Peshawar.
2. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. PS to Chief Secretary, Khyber Pakhtunkhwa.
4. PS to Secretary E&SE, Department.
5. PA to DS (Admn) E&SE Department.

  
SECTION OFFICER (S/F)

~~38~~      38

Ann-71

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BANNU**

**Office Order:**

Consequent upon the recommendation of District Placement/Promotion Committee, the following Class Iv servants are hereby promoted ( Against 33% Quota) to the post of junior clerk BPS-11 (RS: 10510-740-32710) plus usual allowances as admissible to them under the rules on regular basis at the schools/Office noted against each in the interest of public service with immediate effect.

<u>S.No</u>	<u>Name of Candidate</u>	<u>Fathers Name</u>	<u>Design:School/Office/where working</u>	<u>School/Office where appointed</u>	<u>Remarks</u>
1	Abdul Wahab	Muhammad Zahir Shah	Daftari at DEO (Female) Office Bannu.	DEO (Female) Office Bannu	Against vacant post of junior clerk (BPS_11)
2	Wahid Ullah Khan	Rahmat Ullah Khan	Naib Qasid at GGHS Ismail Khel Bannu	GGHS Jhangi Daud Shah Bannu	Against vacant post of Junior Clerk(BPS_11)

**Note:** (1) Charge Report should be submitted to all concerned.  
(2) Necessary entry to this effect should be made in their service books accordingly.

*(MST:BIBI RAZIA)*  
*District Education Officer*  
*(Female) Bannu*

Endst. No. 4188-93

Dated: Bannu / 16 / 08 /2016

Copy forwarded to:

- i. Director, Elementary & Secondary Education KPK, Peshawar.
- ii. Deputy District Education Officer (Female) Bannu.
- iii. Sub Divisional Education Officer (Female) Bannu.
- iv. District Accounts Officer, Bannu.
- v. Headmistress Concerned School.
- vi. Candidate Concerned.

  
*District Education Officer*  
*(Female) Bannu*

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BANNU.

APPOINTMENT ORDER:-

Consequent upon the recommendation of District Selection Committee, the appointment of below named candidates are hereby ordered as Class IV Servant in BPS 03@Rs 8040-325-17790 plus usual allowances as admissible under the rules on regular basis, under the provision of Govt:Khyber Pakhtunkhwa Finance Department(Regulation Win ) Circular No KC/FD/SO(FR/7-20/2015-16 Dated Peshawar the 23 -02-2016 and Establishment & Administration Department circular bearing No.SOR-6 (E&AD) 13/01/2005 on the terms & conditions given below in the interest of Public service from the date of taking over charge.

S.No	Name	Fathers Name	Posts	Remarks
1	Shafi Ullah Khan	Zaram Jan	Naib Qasid SDEO (f) office Tehsil Domel Bannu.	N.C.P  (Open Merit)
2	Amer Khan	Sheraz Khan	Chowkidar SDEO (f) Office Tehsil Domel Bannu.	N.C.P  (Open Merit)

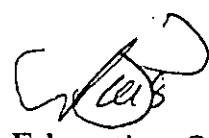
TERMS & CONDITIN:-

1. Their appointment will be considered on regular basis.
2. Their services will be liable to termination on one month notice from either side. In case of resignation without notice one month pay/ allowance will be refunded to Government.
3. Their services will be governed by such rules as the Govt: may issue regulations as from time to time.
4. Their services will be terminated at any time in case their performance is found un- satisfactory during probationary period, in case of misconduct preceded against the Khyber Pakhtunkhwa Govt: Servants (efficiencies and discipline) rules 2011 and the rules framed from time to time.
5. They should not be handed over charge if they exceeds 40 years or below 18 years of age.
6. Charge reports should be submitted to all concerned.
7. No TA/DA is allowed.
8. The DDO concerned is directed to check and verify the certificates/ Degrees of the above named candidates from the concerned Board/ University before the drawl of pay
9. The appointment is liable to termination if the appointee failed to take over charge within fifteen days of the commencement date.
10. The undersigned reserves the right of amendment in the appointment order in case of a mistake.
11. They are required to produce their health and age certificate from the Medical Superintendent DHQ Hospital. Bannu.

(BIBI RAZIA)  
District Education Officer,  
(Female) Bannu.

Endst: No. 5210-15 Dated 22/09/2016

- Copy to the:-
1. Director (E&S) Education Khyber Pakhtunkhwa, Peshawar.
  2. Deputy District Education Officer (F) Bannu.
  3. District Accounts Officer Bannu.
  4. Sub Divisional Education Officer (F) Bannu.
  5. Head Mistress Concerned.
  6. Candidate Concerned.

  
District Education Officer,  
(Female) Bannu.

(40) Ann-VI

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE ) BANNU

MINUTES OF THE MEETING HELD ON 16/08/2016 ABOUT PROMOTION OF CLASS-IV

A meeting of District recruitment /Promotion Committee was held on 16/08/2016 under the Chairpersonship of District Education Officer (Female) in her office. The Chairperson welcomed all the committee members and the meeting was started with the recitation of Holy Quran. The following attended the meeting.

1. Mst: Bibi Razia DEO (F) Bannu. (Chairperson)
2. Sheer Daraqulfi (Member)  
(Representative of Admin: Department)
3. Miss Tujza Abbasi ADEO (f) (Estab:) Bannu. (Member)

The committee members discussed the cases and finalized the promotion process of Class- IV. The committee fully thrashed out and scrutinized the documents/record/applications etc, and put to the local office and decided that the policy in vogue/contract by the Government is to be strictly observed and acted upon in light of directives and rules/regulations meant for the purpose.


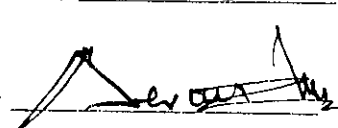

The committee through checking of the documents/record and long discussion reached to the conclusion that the applicants are deserving candidates for promotion against the vacant posts mentioned below and the Committee fully agreed for the promotion of the candidates against the vacant posts.

S.No	Name	Fathers Name	Post and school	Post	right claimed	Remarks
1	Abdul Wahab	Muhammad Zahir Shah	Daftari at DEO (Female) Office Bannu.	Junior Clerk	33% Quota	
2	Wahid Ullah Khan	Rahmat Ullah Khan	Naib Qasid at GGHS Ismail Khel Bannu	Junior Clerk	33% Quota	

**DECISIONS:-**

Promotion orders in respect of mentioned candidates may be issued against vacant posts.

**SIGNATURES OF THE COMMITTEE MEMBERS.**

1. Mst: Bibi Razia DEO (F) Bannu. (Chair Person) 
2. Mr: Sheer Daraqulfi (Member)  
(representative of Admin: Department) 
3. Miss Tujza Abbasi ADEO (F) Estab: Bannu. (Member) 

Annex I 1 "I2" N

(41)

32

I,

پاکستان کے پاس تجارتی کارڈز (X-3) موجود ہیں۔

ان کو تتر روز کارڈ کا نامزد کردہ تصدیق کیا جائے۔

رجسٹر نمبر: 5-89-20 / 05/01

نام: محمد رضا خان

پتہ: سورج

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شامی کارڈ نمبر: 25780/06

تاریخ: 25/06/2022

مقام: سورج

مقامی کارڈ نمبر: 25780/06

مقامی کارڈ نمبر: 25780/06

Annexure

Annexure

I2

I2

میں اس کی کاپی (X-3) کارڈ پر بطور

ایمپلائمنٹ رجسٹریشن کارڈ

رجسٹریشن کارڈ (X-3) موجود نہ ہو۔  
ان کو دفتر روزگار کا نامزد کردہ تصدیق کیا جائے۔

رجسٹریشن نمبر 404/6/6 اکویٹن کوڈ نمبر 5-84-20

تسلیع الیہ صان ولدیت از دیت وارم صان  
مشمول صیل ارن طوعا اول کومیل

شخصی کارڈ نمبر

تاریخ 26-8-016  
تاریخ ہائے تجدید  
Employment Exchange  
BANNU

26-2-017

ضروری اطلاع برائے امیدوار

جب آپ کو ملازمت مل جائے تو فوراً منسلک جوابی کارڈ پر دفتر روزگار  
کو اطلاع کریں۔ اس کارڈ پر ڈاک کا ٹکٹ لگانے کی ضرورت نہیں۔

O.P.S.S.

SERVICE  
UNPAID

خدمت جناب فیج صاحب

دفتر روزگار

ہون

Annexure 'K' Annexure 'J1' Annexure 'N'

(24)

(43)

(J)

# اشتہار برائے بھرتی درجہ چہارم ملازمین

مورخہ: 01-08-2016

بھرتی اور مختلف سکولوں اور دفاتر میں درجہ چہارم ملازمین کی مختلف آسامیاں خالی ہیں۔

خواہشمند امیدواروں سے مورخہ 10-08-2016 تک درخواستیں مع ضروری دستاویزات بشمول رجسٹریشن کارڈ دفتر روزگار

مطلوب ہیں۔

درخواست گزار خالی آسامیوں کی فہرست دفتری اوقات کار میں بورڈ پر آویزاں فہرست سے دیکھ سکتے ہیں۔ اشتہار برائے خالی

آسامیاں مورخہ 16-08-2016 کو دفتر ہذا میں منعقد کی جائے گی۔

بھرتی برطانی بھرتی قوانین درجہ چہارم ملازمین کی جائے گی۔

بی بی رضیہ

ضلعی تعلیمی آفیسر (زنانہ) ضلع بھون

01/08/2016

نقل والا ارسال خدمت ہیں۔

ڈائریکٹر ابتدائی و ثانوی تعلیم صوبہ خیبر پختونخواہ پشاور

بج۔ سب ڈویژن اچو کیشن افسران بھون، ڈومیل

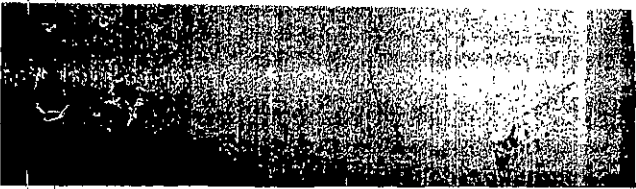
28-4 تمام متعلقہ زنانہ پرائمری، مڈل اور ہائی سکولز

بی بی رضیہ

ضلعی تعلیمی آفیسر (زنانہ) ضلع بھون

01/08/2016





W Anne, J... 'K' 'J1' O Anne 'N'

(44)

(30)  
(J1)

(35)



Fakhar-e-Azam Wazir  
MPA - PK-71 Bannu

Date 19-8-2016

Respected D E O (Female)  
Bannu.

It is stated that Shafiqullah S/O  
Zam Jan should be appointed as  
naib-Darid against the vacant post in  
S.D.E.O domed.

I shall be grateful in this regard  
your own.

F.A.  
Fakhar-e-Azam Wazir  
MPA  
PK-71 Bannu

Fakhar-e-Azam

Contact

0333-5559799  
0345-9416320

Annex 'K' 'J2'

Annex 'N'

(45)

16

J2



Fakhar-e-Azam Wazir  
MPA - PK-71 Bannu

19/08/2016

Respected D. E. ...  
(Female) Bannu.

It is stated with a request that Amer Khan s/o Sherry Khan should be appointed as a ... kidar in D.E. O.P. domain.

I shall be grateful for this regard.

Fakhar-e-Azam Wazir  
MPA  
PK-71 Bannu

Yours truly  
Fakhar-e-Azam

Contact  
0333-5559799  
0345-9416320

دستورالعملی در باره...

Handwritten mark

Handwritten mark

Accepted



Main body of handwritten text in Persian script, partially obscured by a decorative leaf border.

Vertical handwritten text on the left margin: ۱۹۹۸۸۹۲۲-۱۴۲۰۳-۱۹۹۸۸۹۲۲-۶

Form titled 'بازرسی' (Inspection) with fields for name, address, and other details. Includes the Pemasaran Bar Association logo.

Handwritten text below the inspection form: ...

Form with contact information including phone number 0313-5548566, date 8c-19-1121, and address details.



Handwritten number 46 in a circle

Handwritten number 32 in a circle

