

03.02.2022

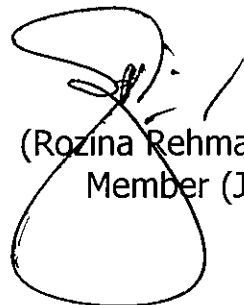
The Tribunal is non-functional, therefore, the case is adjourned to 11.04.2022 before S.B for the same.

  
Reader

11.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 15.06.2022 before S.B.

  
(Rozina Rehman)  
Member (J)

15<sup>th</sup> June 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hamid Saleem (Law Officer) for respondents present.

Respondent No.03 has submitted written reply/comments while respondents No.01 & 02 have not submitted written reply/comments. Learned AAG seeks further time to furnish reply/comments. Last chance is given. To come up for written reply/comments on 04.08.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

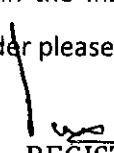

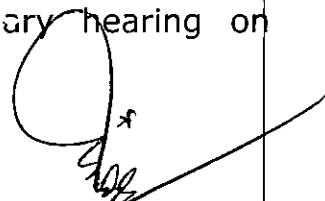
*Rs-500/-  
Amount deposited  
Security & Process Fee  
15/4/22*

Form- A

FORM OF ORDER SHEET

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

Case No.- 7550 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/10/2021	<p>The appeal of Mst. Naheed Akhter presented today by Mr. Noor Muhammad 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>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>10/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
10.	12.2021	<p>Junior of learned counsel for the appellant stated at the bar that senior counsel is busy in Peshawar High Court, Peshawar and is not in a position to attend the Service Tribunal today. To come up for preliminary hearing on 03.02.2022 before the S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member (E)</p>

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

SERVICE APPEAL NO. 7550 /2021

NAHEED AKHTAR

V/S

EDUCATION DEPTT:

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Dated: \_\_\_\_\_10.2021

**APPELLANT**

Through:

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

FLATE NO. 04, 2<sup>ND</sup> FLOOR,  
JUMA KHAN PLAZA, NEAR FATA SECRETARIAT,  
WARSAK ROAD, PESHAWAR

**0345-9383141**

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

APPEAL NO. \_\_\_\_\_/2021

Mst: Naheed Akhtar, SST (BPS-16),  
GGMS Musa Khan Kalli, District Khyber.

..... **APPELLANT**

**VERSUS**

- 1- The Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Chairman Khyber Pakhtunkhwa Public Service Commission, Fort Road, Peshawar.

..... **RESPONDENTS**

**SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 25-06-2021 WHEREBY THE APPOINTMENT NOTIFICATION DATED 25-06-2012 HAS BEEN DISOWNED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned Notification dated 25.6.2021 may very kindly be set aside and the appellant may kindly be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

**R.SHEWETH:**

**ON FACTS:**

- 1- That the Khyber Pakhtunkhwa Public Service Commission advertised various posts including the post of SST (G) (BPS-16), the appellant having the requisite qualification applied for the said post and resultantly recommended by the KP public Service Commission. Copies of the advertisement and Educational testimonials are attached as annexure ..... **A and B.**
- 2- That in light of the ibid recommendation the respondents appointed the appellant as Secondary School Teacher (BPS-16) vide Notification dated 25-06-2012. That in response the appellant got herself medically examined and also submitted

arrival report. That where after the appellant was adjusted at GGMS Musa Khan Killi, Loishilmani, Landi Kotal District Khyber vide Notification dated 29-06-2012 and in response the appellant started performing her duty at the concerned station quite efficiently and up to the entire satisfaction of her superiors. Copies of the Notification and order/ charge report are attached as annexure.....**C & D.**

- 3- That after proper verification of Educational antecedents and service documents the salary of the appellant has been released/started by the concerned authorities. That it is pertinent to mention that during the said period the appellant has successfully completed his probationary period and as such the Department confirmed the appellant against the post of SST (BPS-16).
- 4- That while performing her duties with zeal and zest the appellant was transferred vide order dated 24-03-2017 to GGHS Landi Kotal Khyber and took over the charge. Copies of the transfer order and charge report are attached as annexure.....**E.**
- 5- That unfortunately during service vide impugned Notification dated 25.6.2021 the appointment Notification dated 25-06-2012 of the appellant has been disowned by the respondents without any reason and clear justification. Copy of the impugned Notification is attached as annexure ..... **F.**
- 6- That feeling aggrieved the appellant filed Departmental appeal but no reply has been received so far. Hence the instant appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure ..... **G.**

**GROUND:**

- A- That the impugned order dated 25.6.2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned Notification dated 25.6.2021 has been issued by the concerned authority in violation of the Principle of locus Poenitentiae.

- D- That no charge sheet and statement of allegation has been issued by the concerned authority before issuing the impugned Notification dated 25.6.2021.
- E- That no show cause notice has been issued to appellant before issuing the impugned Notification dated 25.6.2021.
- F- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.
- G- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 25.6.2021.
- H- That the appellant was also assigned seniority in the cadre of SST (BPS-16) and was due for promotion to the next higher scale but unfortunately the authority without any reason & rhyme and without following codal formalities straight away issued the impugned Notifications dated 25.6.2021 whereby the appointment Notification of the appellant dated 25.06.2012 has been disowned by the authority.
- I- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 25.6.2021.
- J- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

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

Dated: 30.9.2021

**APPELLANT**

  
**NAHEED AKHTAR**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**

  
**KAMRAN KHAN**

  
**SAID KHAN**

  
**UMAR FAROOQ**

  
**HAIDER ALI**  
**ADVOCATES, PESHAWAR**

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

SERVICE APPEAL NO. \_\_\_\_\_/2021

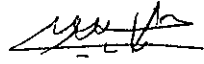
**NAHEED AKHTAR**

**VS**

**EDUCATION DEPTT:**

**AFFIDAVIT**

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.

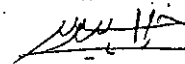


**DEPONENT**



**CERTIFICATE:**

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.



**CERTIFICATION**

**NWFP PUBLIC SERVICE COMMISSION**

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

**ADVERTISEMENT No. 01 / 2009.**

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

**AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:**

**(S.No. 01)** One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

**QUALIFICATION:** M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

**(S.No. 02)** Two (2) Posts of Research officers Fodder. In L&DD Deptt:

**QUALIFICATION:** M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:**

Merit	Zone-1
01	01

**CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.**

**(S.No. 03)** Five (05) Posts of Data Entry Operators:

**QUALIFICATION:** (i) 2<sup>nd</sup> Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

**AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes. **ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

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**DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.**

**(S.No. 04)** One (01) Post of Male Inspector Mines

**QUALIFICATION:** (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1<sup>st</sup> Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi Government Mining Industries registered under the Mines Act, 1923.

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:** NOTE: In case of non-availability of candidates possessing the

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provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

**ALLOCATION:**

S.No	Subject	No. of Posts	Allocation
5	Islamiyat	02	Merit Quota
6	Pak. Study	03	Merit Quota
7	History-Cum-Civics	02	Merit Quota
8	Economics	02	Merit Quota
9	English	02	Merit Quota
10	Statistics	02	Merit Quota
11	Maths	02	Merit Quota
12	Biology	02	Merit Quota
13	Chemistry	02	Merit Quota
14	Physics	02	Merit Quota

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

(S.No. 54) Ninety Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

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(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.  
For Secondary School Teacher (Science) (i) BSc. Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.  
ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.  
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
AGE LIMIT: 21 to 40 years. years (10 years age relaxation)  
PAY SCALE: BPS-16 ELIGIBILITY: Female.  
ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.  
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.  
ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

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QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.  
OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.  
AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.  
ALLOCATION: Merit.

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

QUALIFICATION: (a) Ph. D. in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

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(S.No. 66) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Male.

ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

(S.No. 67) One (01) Post of Female office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.

ALLOCATION: Merit.

### CORRIGENDUM

1. The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt. No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advtt. No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

### GENERAL CONDITIONS.

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tannwal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangha, Gadoon Area in Swabi, Backward areas of Manshara and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

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- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
  - (a) Written Test in the Subject.
  - (b) General Knowledge or Psychological General Ability Test.
  - (c) Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- (i) Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Manshra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

ATTESTED

(Atta Ur Rehman)  
Secretary

NWFP Public Service Commission  
2-Fort Road Peshawar Cantt: Ph: 9212962

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ATTESTED



## UNIVERSITY OF PESHAWAR

(Pakistan)

Detailed Marks Certificate

Required: Pass Percentage - 40, Aggregate Pass Percentage - 45%

Bachelor of Education (B.Ed)

Annual Examination, 2005

The Candidate appeared from: Mardan

Roll No. Name: NAHEED AKHTAR

1910

Father's Name: MUSAFAR KHAN

Division in Theory: 2nd

Division in T. Practice: 1st

Registration No. 96-PS-3602

Gender: Female

Overall Division: 2nd

Papers	Maximum Marks	Marks Obtained		
		In Figures	In Words	
Educational Psychology, Guidance & Counselling	100	46	Forty Six	
Perspectives of Education & Contemporary Social Issues	100	50	Fifty Only	
Curriculum and Instructions	100	41	Forty One	
Islamiyat and Islamic Ethics / Islamic History (for Non Muslims)	50	40	Forty Only	
School Organization and Classroom Management	50	21	Twenty One	
Functional English	50	20	Twenty Only	
Evaluation Techniques	50	25	Twenty Five	
Methods of Teaching - I English	100	40	Forty Only	
Methods of Teaching - II Urdu	100	69	Sixty Nine	
Elective Subject: Foundation of Education	100	61	Sixty One	
Practice of Teaching	200	123	One Hundred and Twenty Three	
<i>Errors &amp; omissions are subject to subsequent rectification.</i>	Total:	1000	536	Five Hundred and Thirty Six

The Examination was passed In Parts


Examination Held in July 26 --- Sept 28, 2005

Result Declared on December 22, 2005


Dated:- 24/12/2005

Designed &amp;

Prepared by: Ahmad Jan

  
 Controller of Examinations  
 University of Peshawar

NO 023007

  
 ATTESTED

GG No 430429

11

# Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)  
Session 19 93 (Annual/Supplementary)

Name Nabeed AkhtarFather's Name Musafar KhanRoll No. 8118

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	67	Three hundred thirty
2. Urdu	150	62	
3. Islamiyat Comp:	75	33	
4. Pakistan Studies	75	25	
5. Gen: Mathematics	100	34	
6. General Science	100	44	
7. Art	100	33	
8. P.A	100	52	
<b>Total</b>	<b>850</b>	<b>330</b>	<b>D</b>

This certificate is issued errors and omissions excepted.

Prepared by \_\_\_\_\_Checked by \_\_\_\_\_Date \_\_\_\_\_ 19 \_\_\_\_\_

Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR


NOTED

S. No. PBP. 0092962

Roll No. 8118

Revised

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**  
**SESSION 1993 (ANNUAL)**  
**(HUMANITIES GROUP)**

THIS IS TO CERTIFY THAT Naheed Akhtar  
 Son/Daughter of Musafar Khan  
 and a resident of Mardan District

has passed the Secondary School Certificate Examination  
 of the Board of Intermediate and Secondary Education, Peshawar held in April, 1993  
 as a *Private candidate*. He/She obtained 330 Marks out of 850  
 and has been placed in Grade E Representing Satisfactory

The Candidate passed in the following subjects:

- |            |                     |                     |           |
|------------|---------------------|---------------------|-----------|
| 1. English | 3. Islamiyat        | 5. Gen. Science     | 7. Pashto |
| 2. Urdu    | 4. Pakistan Studies | 6. Gen. Mathematics | 8. E:H:E  |

Date of birth according to admission form is First February,  
 one thousand nine hundred and Seventy Eight (01-2-1978)

Issued in lieu of Oc. No. 0092347

Asst. Secretary

7th August, 1993

This certificate is issued without alteration or erasure.

Secretary

ATTESTED



13

S. No. 302954



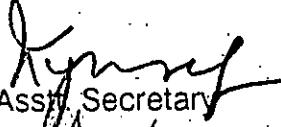
Roll No. 161478


**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**

Peshawar N.W.F.P. Pakistan  
**INTERMEDIATE EXAMINATION**  
 \_\_\_\_\_ Group  
 Humanities  
 SESSION-1995 (ANNUAL)




THIS IS TO CERTIFY THAT Naheed Akhtar  
 Son/Daughter of Musafar Khan  
 and a resident of Mardan District  
 Registered No. 8343-B/P-94 has passed the *Intermediate Examination* of the  
 Board of Intermediate and Secondary Education, Peshawar held in May/June 1995  
 as a *Private candidate*. He/She obtained 465 Marks out of 1100  
 and has been placed in Grade  Representing Fair  
 the Examination was taken as a whole/in parts.

  
 Asst. Secretary

  
 Secretary

*This certificate is issued without alteration or erasure.*

ATTESTED 



# Board of Intermediate & Secondary Education PESHAWAR

## DETAILED MARKS CERTIFICATE Intermediate Examination Humanities Group



23174 SESSION 19 15-16 (Annual/Supplementary)

Sr. No.

Name

*Naheed Akhtar*

Father's Name

*M. A. Farooq Khan*

Roll No. 161478

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200	<i>100</i>	<i>100</i>	<i>200</i>	<i>200</i>
2. Urdu	200	<i>100</i>	<i>100</i>	<i>200</i>	<i>200</i>
3. Islamic Education	50	<i>25</i>	<i>25</i>	<i>50</i>	<i>50</i>
4. Pakistan Studies	50	<i>25</i>	<i>25</i>	<i>50</i>	<i>50</i>
5. <i>1H</i>	200	<i>100</i>	<i>100</i>	<i>200</i>	<i>200</i>
6. <i>pa</i>	200	<i>100</i>	<i>100</i>	<i>200</i>	<i>200</i>
7. <i>95</i>	200	<i>100</i>	<i>100</i>	<i>200</i>	<i>200</i>
Total	1100	<i>550</i>	<i>550</i>	<i>1100</i>	<i>1100</i>

Note: Errors/Omissions excepted.

Date

19

Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR

Prepared by

Checked By

ATTESTED



# University of Peshawar

(Pakistan)

15

Roll No. 81322

## DETAILED MARKS CERTIFICATE

B.A. Part-II Examination 1989 Annual/Supplementary

Name: Wahid Akhtar

Father's Name: Musafar Khan

Certified that the candidate secured the following detailed marks and is placed in 1st Division.

S. No.	Subject	Maximum Marks	MARKS OBTAINED	
			IN FIGURES	IN WORDS
1.	English	75	25	33.33%
2.	Urdu	75	25	33.33%
3.	Islamic Studies	75	25	33.33%
4.	Pakistan Studies	40	15	37.50%
Part-II Marks		285		
TOTAL		550		

Errors & Omissions are Subject to subsequent rectification.

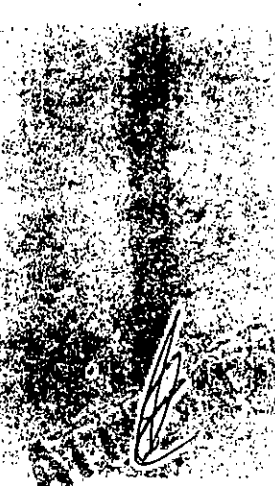
The Examination was taken as a whole / in Parts Peshawar - 2005

Prepared by: \_\_\_\_\_

Date: 5.5.2006

S No 007313

CONTROLLER OF EXAMINATIONS,  
UNIVERSITY OF PESHAWAR.



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

16

# University of Peshawar

(Pakistan)

Session ANNUAL 1999

NAHEED AKHTAR

DAUGHTER

of

MUSAFAR KHAN

and a

student of

DISTRICT MARDAN

having passed the prescribed examination held in

JULY 1999

and is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Arts

in THIRD Division

The Examination was taken as ~~xxxxxx~~ whole / in parts.

Serial No: 077141

Registration No. 96-PS-3602

Roll No: 81322

Result Declared on 22ND NOVEMBER, 1999



M. Farooq Khan  
Registrar

Countersigned  
Vice-Chancellor

ATTACHED



UNIVERSITY OF PESHAWAR  
(Pakistan)

17

Detailed Marks Certificate  
Master of Arts (FINAL) in  
Urdu Annual Examination 2002

Private Candidate from Mardan

Name: Naheed Akhtar

Gender: Female Roll No. 28818

Father's Name: Musafar Khan

Registration No. 96-PS-3602

Papers	Marks Obtained		
	Maximum Marks	In Figures	In Words
Poetry "Nazam" (VI)	100	41	Forty One
Qasida, Masnavi and Marsia (VII)	100	52	Fifty Two
Iqbaliyat (VIII)	100	62	Sixty Two
Criticism (IX)	100	46	Forty Six
Essay etc. (X)	100	44	Forty Four
Viva Voce	100	50	Fifty Only
M.A Previous Marks	500	248	Two Hundred and Forty Eight
Total:			1100 543 Five-Hundred and Forty Three

Verified & Found Correct  
 Deputy Controller of Examinations,  
 University of Peshawar

Controller of Examinations  
 University of Peshawar

Errors and omissions are subject to subsequent rectification

The examination was passed in Parts in Second division.

Examination Held in Theory (92-96) B. Arts Year (I, II, III, IV) 2002 Result Declared on March 21, 2007

No. 020067

DMC issued on: 10/04/03 at 08:43:00

M.A. in English, First Year Exam in History of Peshawar University

*attested*  
ASH

*[Signature]*  
Controller of Examinations  
University of Peshawar

ASHFAQ RAZA  
Subject Specialist  
In English  
G.H.S. School Ismaila  
*in abi*

*[Signature]*



UNIVERSITY OF PESHAWAR  
(Pakistan)

18

*Detailed Marks Certificate*  
Master of Arts (PREVIOUS) in  
Urdu Annual Examination, 2000

Private Candidate from Mardan

Required: Pass Percentage - 40; Aggregate Pass Percentage - 45

Name: *Naheed Akhtar*

Gender: *Female* Roll No. *16137*

Father's Name: *Musaffar Khan*

Reg. No. *96-PS-3602*

Papers	Maximum of Marks	Marks Obtained	
		In Figures	In Words
History of Urdu Literature	100	44	Forty Four
Fiction	100	40	Forty Only
Prose	100	54	Fifty Four
Modern Prose	100	55	Fifty Five
Ghazal	100	55	Fifty Five
Total:		500	248
Errors and omissions are subject to subsequent rectification.		Two Hundred and Forty Eight	

The examination was passed *as a Whole*

Examination Held in 14-27, 2000  
Result Declared on May 07, 2001

*Musaffar Khan*  
Controller of Examinations  
University of Peshawar

Nº 050673

ATTACHED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar

(Pakistan)

Session ANNUAL 2002

NAHEED AKHTAR

DAUGHTER

of

MUSAFAR KHAN

and a student

of DISTRICT HARDAN having passed the prescribed examination  
held in SEPTEMBER 2002 is this day admitted by the University of Peshawar

to the Degree of  
**Master of Arts**

in SECOND Division

The Subject of Examination being URDU

The examination was taken as ~~a whole~~ in parts.

Serial No 039116

Registration No. 95-PG-3602

Roll No. 28818

Result Declared on MARCH 31, 2003



M. Farid Khan  
Registrar

Countersigned  
Vice-Chancellor

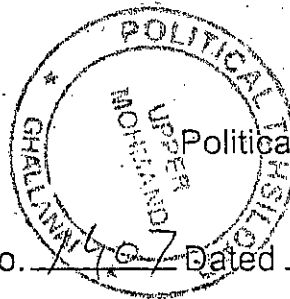
(20)

OFFICE OF THE  
**POLITICAL AGENT MOHMAND AGENCY**  
**Domicile Certificate**

Certified that Mr./Miss Maheed Akhtar  
Son/Daughter of Mulafar KHAN  
Belongs to a recognized tribe of MOHMAND  
section Musa Khel Sub section Rahmat 100  
Residence / Village Motlan Dargah

and his / her father is a permanent bonafide of the tribal area of Mohmand Agency.  
He / She is an eligible candidate to avail himself / herself of the Seats reserved for  
FATA Mohmand Agency.

Category B3



M  
Political Naib Tehsildar  
2

No. 1130 Dated 21/03/2003

Countersigned

Jansari

Political Agent  
Mohmand Agency

No. 1737  
15-3-2003

[Signature]

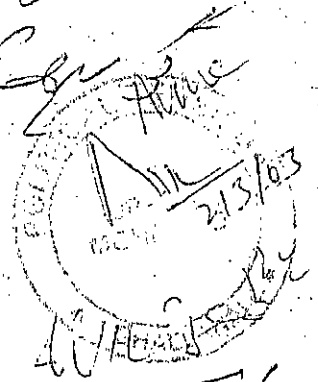
Assistant Political Agent  
Mohmand Agency

No. 1130 Dated 11/3/2003

[Signature]

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
مَنْ كَانَ مِنْكُمْ فَاعْلَمْ أَنَّ اللَّهَ يَنْزِلُ فِيهِ  
مَنْ كَانَ مِنْكُمْ فَاعْلَمْ أَنَّ اللَّهَ يَنْزِلُ فِيهِ  
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مَنْ كَانَ مِنْكُمْ فَاعْلَمْ أَنَّ اللَّهَ يَنْزِلُ فِيهِ  
مَنْ كَانَ مِنْكُمْ فَاعْلَمْ أَنَّ اللَّهَ يَنْزِلُ فِيهِ  
مَنْ كَانَ مِنْكُمْ فَاعْلَمْ أَنَّ اللَّهَ يَنْزِلُ فِيهِ



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

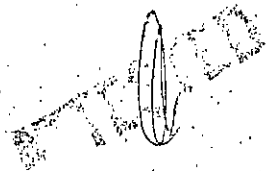
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21406-7341403-7

21406-7341102-6

21407-2100141-7

21406-5211636-3







Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936  
E-mail [desekpk@quikoo.com](mailto:desekpk@quikoo.com)

### Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST General) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his Services placed at the disposal of Director Education FATA for further posting against vacant SST General posts:-

SNO	Name	Father's Name	Domicile	Zone	Permanent Address	Place of Posting
1.	Naheed Akhtar	Musafar Khan	Khyber Agency	I	Hayat Abad Phase-VI, Tehsil & Distt: Peshawar.	Services placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
2.	Basmina Begum	Mir Alam Khan	Mohmand Agency	I	Village Shamlat P.O Shergarh Tehsil Takht Bhai Distt: Mardan	... Do ...
3.	Farzana	Riwaj-ul Din	Mohmand Agency	I	Moh: Jan Abad Tehsil & District Mardan	... Do ...
4.	Ishrat	Bahadar Sher	Mohmand Agency	I	Musakhail, Rahmatkot, Tehsil Upper Mohmand, Mohmand Agency	... Do ...

#### Terms and conditions:-

1. Her services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, she is already in Government service and working against pensionable post on regular basis before 1<sup>st</sup> day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.
3. Her services are liable to termination on one months notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.

*(Signature)*

*(Signature)*

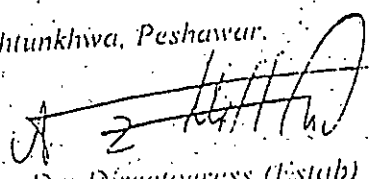
4. She should join her post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification her appointment will expire automatically and no subsequent appeal etc shall be entertained.
5. She would be on probation for a period of one year extendable for another one year.
6. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned
9. The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The EDOs concerned will verify their documents before release of pay.
11. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining his duty.

(Muhammad Rafiq Khattak)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Endst: No. 2816-23/File No. 2/A-14/SST(F) Gen/PSC/Appt: Dated Peshawar the 25/06/2012

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Director of Education FATA Warsak road Peshawar.
4. All Agency Accounts Officers in FATA.
5. Official Concerned
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director. E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File

  
Dy. Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

25/6/12



GOVERNMENT OF KHYBER PAKHTUNKHWA

CERTIFICATE OF TRANSFER CHARGE

Certified that I Mst. NAHEED in Law took over charge of my duty against the vacant post of SSI (General) at GGMS Musa Khan Killi Loishilman Landi Kotal Khyber Agency on the forenoon 29.06.2012 vide Secretary Social Sector Department FATA Secretariat Warsak Road Peshawar. Endst: No. 9074.82 dated 28.06.2012

Station GGMS Musa Khan Killi Loishilman Landi Kotal Khyber Agency

Signature of relieved  
Government Servant Vacant  
Designation SSI (General)

Signature of Government Nahged  
Servant receiving charge  
Designation SSI (General)

Endst: No 2816-23/ File No. 2/A 14 SSI (F) Gen. PSC Apptt: Dated Pesh: 25.06.2012

No. 6255-62 dt 2/7/2012

From Agency Education Officer,  
Khyber Agency at Jamrud.

To.

1. Secretary Higher Education, Archives & Libraries Department Khyber Pakhtunkhwa.
2. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
3. PS to Secretary Social Sector Department FATA Secretariat Peshawar.
4. Director of Education FATA, at Peshawar.
5. Accountant General (PR) Sub Office Peshawar
6. Agency Accounts Officer Khyber Agency at Jamrud.
7. Agency Education Officer Khyber Agency at Jamrud.
8. Officer concerned.

AGENCY EDUCATION OFFICER  
Khyber Agency at Jamrud

**DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR**  
**TRANSFER**

Consequent upon the recommendation of the placement committee, transfer of the following SSTs (Female) are hereby ordered in their own pay and scale in the schools as noted against their names with immediate effect in the interest of public service:-

S/No	Name/Designation/School	Transferred to	Remarks
1	Mst Jamila Bibi SST Sc GGHS Pekar Kurram	GGHS Parachinar Kurram	AVP
2	Mst. Robina SST GGHS Arkho Killi Kurram	GGHS Gandhi Tall Orakzai Agency	-do-
3	Mst, Shamim Fatma AAEO (F) Kurram	GGMS Sra Gala Kurram	-do-
4	Mst. Nasim Akhtar SST GGMS Surak FR Kohat	GGMS Sher Baz Killi FR Kohat	-do-
5	Mst. Asia Sultana SST GGHS Razmak NWA	GGMS Khan Mir Kot NWA	-do-
6	Naheed Akhtar SST GGMS Musa Khan Killi Khyber	GGHS Landi Kotal Khyber	-do-
7	Nagina SST GGMS Spinkai SWA	GGHS Chagmalai SWA	-do-
8	Nafisa Bibi SST GGHS Waris Khan Killi FR Pesh	GGMS Attariwal FR Kohat	-do-
9	Najla Afridi SST GGMS Mir Halder Killi FR Pesh	GGMS Baz Muhammad Kor Mohmand Agency	-do-

**NOTE:-**

- 1 Charge report should be submitted to all concerned
- 2 TA/DA etc is not allowed

6811-40  
DIRECTOR EDUCATION (FATA)

Endst: No.          /A-1/Gen Transfer SST(F)      Dated Pesh: the 24/3 2017

Copy forwarded to the:-

- 1 All Agency Education Officers concerned with the remarks to please check their service documents before handing over charge.
- 2 All Agency/District Accounts Officers concerned
- 3 All Principal/Headmistress concerned
- 4 EMIS Local Directorate
- 5 P.A to D.E FATA
- 6 D/Files

*(Handwritten Signature)*  
ATTACHED

GOVT OF NORTH WEST FRONTIER PROVINCE  
CERTIFICATE OF TRANSFER OF CHARGE

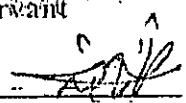
26

Certified that I Mst: Nabeed Akhtar SST have this day 31/3/2017 (D.N) handed over charge of the office of the  
GGMS Musa Khan Killi vide Director Education FATA Secretariat Wansak Road Peshawar. Endst:  
No: 6811-40 dated 24/03/2017  
Transferring Nabeed Akhtar (SST)

To GGHS LANDI KOTAL KHYBER AGENCY

2. Particular of cash and important /secret/confidential documents handed over/taken over are noted on the reverse.

Signature of relieved  
Government servant

Designation: 

Station GGMS Musa Khan Landi Kotal

Signature of Govt.  
Servant Receiving Charge

Designation: \_\_\_\_\_

Dated 31/3/2017

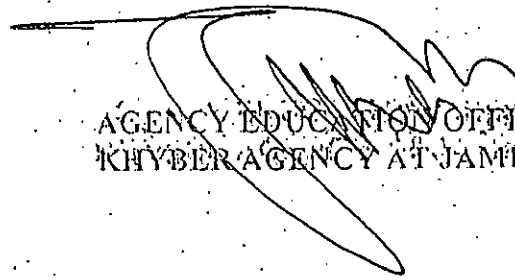
Endst: NO. \_\_\_\_\_ Dated: \_\_\_\_\_

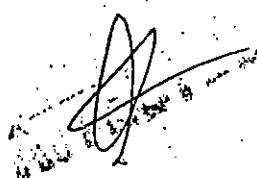
From

Agency Education Officer  
Khyber Agency at Jamrud

To

01. Director of Education FATA N.W.F.P. Peshawar.
02. Agency Account Officer Khyber Agency.
03. Principal GGHS Landi Kotal
04. Office record

  
AGENCY EDUCATION OFFICER  
KHYBER AGENCY AT JAMRUD





DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA PESHAWAR

### NOTIFICATION

1. WHERE AS, one Mst. Naheed Akhtar D/O Musafar Khan who herself appointed as SST (G) in GGMS Musa Khan Killi, now working at GGHS Landi Kotal District Khyber wide Notification No. 2816-23/File No. 2/A-14/SST(F)/Gen/PSC/2012 dated 25/06/2012, which was not issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa is fake bogus.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 778 dated 24-04-2021 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Naheed Akhtar D/O Musafar Khan, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1955 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus; thus her appointment/adjustment Notification No. 2816-23/File No. 2/A-14/SST(F)/Gen/PSC/2012 dated 25/06/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst Naheed Akhtar D/O Musafar Khan in the interest of Public Service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst No. 10306-11 dated 25/06/2021  
Copy forwarded to the:-

1. Regis Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. District Education Officer Khyber with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned
3. District Account Officer Khyber.
4. Principal/Head Mistress concerned
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa

Deputy Director (Data)  
Merged District

Establish  
Mst. Naheed Akhtar  
AD EO (F)

25/7/21

760

*(Signature)*

# ANNEXURE 9

28

To,

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

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE  
IMPUGNED NOTIFICATION DATED 25.6.2021  
WHEREBY APPOINTMENT ORDER OF THE  
APPELLANT HAS BEEN DISOWNED**

**R.SHEWETH:**  
**ON FACTS:**

- 1- That initially the appellant was inducted/ appointed as Secondary School Teacher (BPS-16) on the proper recommendation of Khyber Pakhtunkhwa Public Service Commission vide Notification dated 25.6.2012. That in response the appellant got herself medically examined and also submitted arrival report. That where after the appellant started performing her duty at the concerned station quite efficiently and up to the entire satisfaction of her superiors.
- 2- That after proper verification of Educational antecedents and service documents the salary of the appellant has been released/started by the concerned authorities.
- 3- That it is pertinent to mention that appellant is equipped with the qualification of M.A and professional qualification of Master of Education which is over and above the requisite qualification for the post of SST (BPS-16).
- 4- That it is pertinent to mention that during the said period the appellant has successfully completed her probationary period and as such the Department confirmed the appellant against the post of SST (BPS-16).
- 5- That so much so the appellant was also assigned seniority in the cadre of SST (BPS-16) and was due for promotion to the next higher scale but unfortunately the authority without any reason & rhyme and without following codal formalities straight away issued the impugned Notification dated 25.6.2021 whereby the appointment Notification of the appellant dated 25.6.2012 has been disowned by the authority.
- 6- That appellant feeling aggrieved filed the instant Departmental appeal on the following grounds amongst the others.

**GROUND:**

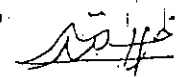
- A- That the impugned order dated 25.6.2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned Notification dated 25.6.2021 has been issued by the concerned authority in violation of the Principle of locus Poenitentiae.
- D- That no charge sheet and statement of allegation has been issued by the concerned authority before issuing the impugned Notification dated 25.6.2021.
- E- That no show cause notice has been issued to appellant before issuing the impugned Notification dated 6.6.2016.
- F- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.
- G- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 25.6.2021.
- H- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

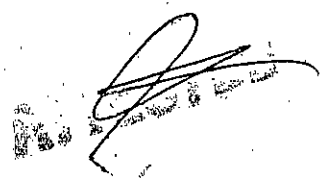
It is therefore most humbly prayed that on acceptance of this Departmental appeal the impugned Notification dated 25.6.2021 may kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

DATED: 28.6.2021

APPELLANT



Naheed Akhtar, SST (BPS-16),  
GGMS Musa Khan Kalli, District Khyber.





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VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

APPEAL NO: \_\_\_\_\_ OF 2021

Naheed Akhtar (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Education Deptt. (RESPONDENT)  
(DEFENDANT)

I/We Naheed Akhtar

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2021

Naheed Akhtar  
CLIENTS

NOOR MOHAMMAD KHATTAK  
ACCEPTED

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN  
KAMRAN KHAN

UMER FAROOQ MOHMAND  
UMER FAROOQ MOHMAND

SAID KHAN  
SAID KHAN

& Haider Ali  
& HAIDER ALI

HAIDER ALI  
ADVOCATES

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

SCANNED  
KPST  
Peshawar

Service Appeal No. 7550/2021

Mst. Naheed Akhtar.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa & others.....Respondents

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Senior Law Officer  
Khyber Pakhtunkhwa  
Public Service Commission

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

Service Appeal No. 7550/2021

Mst. Naheed Akhtar.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

**PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)**

Respectfully Shewth:

**PRELIMINARY OBJECTIONS:**

1. The appellant has not been recommended against any of the advertised posts. She is not a genuine recommendee / selectee of the Public Service Commission in respect of the post in question.
2. That the instant Service Appeal is not maintainable against the replying Respondent No.3.
3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
4. That the appellant is misleading this Honorable Service Tribunal as she never applied to the answering Respondent.
5. That instant Service Appeal is liable to be dismissed with special costs as the same is based on ulterior motives of the appellant.
6. Instant service appeal is based on misrepresentation.

**ON FACTS:**

- 1-2. That the Khyber Pakhtunkhwa Public Service Commission advertised 973 (782 for Arts Group & 191 Science) posts of SETs/SSTs vide Advertisement No. 01/2009 S.No. 55 dated 26.01.2009 with the following qualifications: (Break up of 973 (782 Arts 191 Science) was published in Advt: No. 02/2009 through corrigendum).

*NA*  
*Naheed Akhtar*

**QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second**

Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

**For Secondary School Teacher (Science)** (i) BSc Second Division with at least Two of the Subjects of Physics, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

**(Annex-A)**

A total of 918 candidates qualified. Final merit list is **Annex-B**. According to Zonal allocation 696 candidates were recommended out of 918 candidates on basis of their total marks and interview marks. The remaining posts were conveyed to the parent department, because it went out of the purview of Khyber Pakhtunkhwa Public Service Commission. The appellant neither applied nor recommended against any of the advertised posts. List of the genuine candidates who appeared before the Commission and qualified the viva voce is already annexed as B. Therefore her name not found in the list *ibid*. The rest of the contents does not pertain to Khyber Pakhtunkhwa Public Service Commission


3-6. Not pertaining to Public Service Commission.

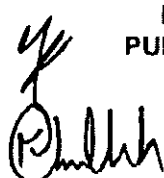
**GROUND.**

A-I. Not pertaining to Public Service Commission.

J. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.

  
 CHAIRMAN  
 KHYBER PAKHTUNKHWA  
 PUBLIC SERVICE COMMISSION  
 PESHAWAR  
 (RESPONDENT NO.03)



**AFFIDAVIT**

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

**DEPONENT**



**MEHTAB GUL**  
**LAW OFFICER**  
**KP PUBLIC SERVICE**  
**COMMISSION Resp.# 3**  
**PESHAWAR**  
**CNIC:17301-1972107-9**  
**MOBILE: 0332-9920894**