

Page-2

TT, GGMS Shala Khail and to produce evidences if any, in support of his allegation. (Annex-1)

The accused teacher, Ms. Bushra Begum was also called vide letter No.137-38 Inquiry file Ms. Bushra, GGMS, Shala khail dated 26-03-2016 to appear before the Enquiry Officer to produce any evidence, documentary or others, to prove herself not guilty / innocent. (Annex-2)

The complainant appeared before the Enquiry Officer on the scheduled date, time and venue and stated that he stands by his written statement and that he has already provided sufficient documentary evidences in support of his statement. (Annex-3)

The accused teacher presented herself before the Enquiry Officer on 26/3/2016 and filled out a questionnaire form designed for the purpose of inquiry. (Annex-4)

Allegation No:-1

She was appointed as TT teacher under Endstt: no:915-33/TT dated 17-01-1998, While her academic/Professionals certificates/Degrees have been verified from the concern Boards / Universities under Endstt: No. 14479-84/EDO(E&SE)NSR/Clearance/SST(G)/M. Dated 17-11-2012 but in fact no document regarding verification of istiadadi sanad shoba elimo Deniyat (TT Certificate) is available on record in the office of EDO/DEC(F), Nowshera OR Teacher concern

(Annex-5,6)

A letter No:139/ complaint/f/Nowshera/Bushra Begum was written to Madrasa Saadat Darul Aloom Toru, Mardan for the verification and confirmation of genuineness of the Sanad, titled Istiadadi Sanad Shoba Elmo Daniyat (TT Certificate) District Mardan issued to the accused teacher on the basis of which she was appointed as Theology Teacher vide Notification 915-33 dated 17-01-1998 (Annex-7)

Page no-3

The reply dated 10/05/2016 received back from the said Madrassa states,

"That there was no arrangement of female education,

nor the Madrassa issued any sanad to any female"

(Annex-8),

Hence the sanad found fake.

Allegation No:-2

The accused teacher got job in Education Department when she was appointed as Theology Teacher on 17-01-1998 but at the same time she was a regular student of B.A in GGDC Nowshera. She remained student at GGDC Nowshera till June 1998, a fact not refuted by the accused teacher.

(Annex - 9, 10, (Annex-4 Answer NO: 8)

Hence the allegation found correct.

Allegation No:-3

The head Mistress GGHS, Dheri Katti Khail stated that the accused teacher took charge as TT at local school vide no: 915-33 dated 17-01-1998. She further stated that in the light of order of then EDEO E&SE Nowshera, she was detailed to GGMS Khattak Building from 01-01-2009 to 03-07-2012. She further stated that later on her order had been cancelled but the accused teacher performed duty regularly at GGMS Khattak Building Nowshera. The same was verified by the attendance register and found correct.

(Annex-11 A,B)

Hence the allegation found correct.

Allegation No:-4

The Sanad called Shahadatul Alia issued by Tanzeem Ul Madaris (Ehl-e-Sunnat) Lahore is not owned by the accused teacher, therefore no action for the verification of the same was deemed appropriate. Although she stated that she disowns the sanad, however she was

29/10

promoted to BPS 14 and also has received financial benefits accruable on the basis of the said sahad.

(Annex-12, 13, 14, 15, Annexure 16...Answer-6) Annexure-17..Service Book page No:7

Annex-No: 18)

Allegation No:-5

Her B.Ed degree was acquired from Shah Abdul Latif University, while she have sought departmental permission for B.Ed degree-examination from Peshawar University for which her degree was suspicious. (Annexure 19, 20)

The matter was inquired in detail. Her B.Ed degree was verified on 10-11-2012 vide NO: Exam/very/SALU/KHP/207 and Re verified by the Shah Abdul Latif University Khairpur on 09-05-2016. (Annexure 21-22)

The accused teacher obtained B.Ed degree from the Shah Latif University Khairpur under session 1999-2000. However at the time of enrollment for B.Ed programme she didn't qualify her B.A, which is a precondition for the enrollment.

(Annexure-23 B.Ed. Notification Note No.5 Admission form page No: 7)

Annexure 24-Examination Form-Column No-6, regulations for Private (date -2)

During the course of inquiry a chronic disorder came under notice regarding her B.ED Program and was discussed with the controller of examination SALU Khairpur.

- (i) She appeared in B.A Examination in July
- (ii) According to the statement of the accused teacher she appeared for B.A examination from 6th June 1999 to 31 August 1999
- (iii) She registered with SALU Khairpur in September 1999 (Annexure-25)

30

a

- (iv) Her date of result declaration of B.A is November 1999
- (v) She got Departmental Permission for B.Ed examination from University of Peshawar on 29-05-2000 vide Endstt: No: 3564 office of DEO(f) Primary, Nowshera. (Annexure -19)

(According to policy of HEC the Degrees with time clash are not allowed in any case.)

(Annexure No:-26 HEC Policy Guide line for two degrees page-1, Note No-2, page-2-note-2,3)

Hence the allegation found correct.

Allegation No:-6

The recommendation by the Public Service Commission for the post of SST was verified by the PSC, Khyber Pakhtunkhwa under letter No: 156 dated 07-04-2016 and her recruitment against the said post found correct vide no. PSC/SR-II Dated 20-04-2016. (Annexure No: 27)

Hence the allegation was not correct.

Allegation No:-7

The attendance register was checked and found no irregularity regarding performing frequent duties under BISE in various examination.

Hence the allegation is not correct.

FINDINGS/CONCLUSION

The above proceedings clearly establish three facts;

1:- That the accused teacher has committed certain serious irregularities which warrant appropriate punishment(s) as defined by section 26 of KPK civil servant Act, 1973 (Act NO XVIII of 1973) E&D Rule 26.11, Para III & b 1.11.

2:- The concern officials of the department have miserably failed to timely verify the

31 8

credentials of the accused teacher and the genuineness of her documents the time of appointment /Promotions due to which the accused teacher stayed on Job for past (18) Eighteen Years.

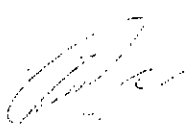
3:- Shah Abdul Latif University is equally responsible for Enrollment/Registration/issuing of verified B.Ed degree to an ineligible candidate As no submission of any fake document by the candidate for enrollment / Registration of B.Ed Examination was found on record of Shah Abdul Latif University.

No justification by the controller of Examination was provided.

RECOMMENDATIONS.

It is therefore, recommended that the following penalties be imposed on the accused teacher:

- 1:- A Recovery of financial benefits derived on account of Shahadat ul Alim and B.Ed.
B: - Removal from service on account of acquiring Govt Job on the basis of false samathe deniyat (TT Certificate)and other irregularities committed by her.
- 2:- The concern officials of Department may be punished under E&D Rule being inefficient.
- 3:- The case may be forwarded to Higher Education Commission against Shah Abdul Latif University Khairpur for Registration of an ineligible candidate and issuance of B.Ed Degree to a candidate who did not qualify her B.A, Which is a pre requisite for enrollment in B.Ed program.


Farida Begum

PRINCIPAL

RITE (F), PESHAWAR

rk
Degree of B.ed is verified by Shah Abdul Latif University Khairpur but she got herself admitted in the B.ed programme at a time when she had not yet qualified her BA which is the prerequisite qualification.

An early reply from your end shall be highly appreciated.

Yours sincerely,

Principal

RITE (C), PESHAWAR

Endst:-238-1

Copy to: - Director E&SE, Peshawar.

SHOW CAUSE NOTICE

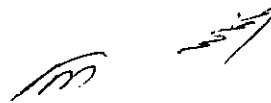
Aux - H

I, Muhammad Rafiq Khattak Director Elementary & Secondary Education Khyber Pakhtunkhwa as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Bushra Begum SST GGMS Shala Khel Nowshera, as follows:-

- (33)
- As per recommendation of inquiry officer Mst. Farida Begum Principal RITE(F) Peshawar vide No.248 dated 30-05-2016.
 - The TITLED ISTADADI SANAD SHOBA ELM -O-DANIYAT (TT certificate) District Mardan issued to you on the basis of which you were appointed as TT vide Notification No.915-33 dated 17-1-1998 is found fake.
 - ① You were appointed as TT on 17-1-1998 but at the same time you were a regular student of BA in GGDC Nowshera.
 - ② Your B.Ed degree was acquired from Shah Abdul Latif University while you have sought departmental permission for B.Ed degree examination from Peshawar University for which your degree is suspicious.
 - ③ At the time of enrollment for B.Ed Programme you did not qualify your BA degree which is a pre-requisite/precondition for the enrollment in B.Ed course.
 - ④ Thus on the basis of BA/B.Ed Degree you were recommended by PSC KPK under letter No.166 dated 07-04-2016 and appointed as SST vide Notification No.5001-8 dated 03-10-2012 by this Directorate is doubtful.
 - I am satisfied that you are guilty of misconduct and inefficiency as specified in rules 3 (a,b) of the said rules. Thus you have rendered yourself liable to be proceeded against under the said rules.

In exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the competent authority, is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice with a the direction to submit your defense in writing within 07(seven) days of the receipt of this notice as to why one of the major or minor penalty of rule-4 of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person.

In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and an ex-parte decision will be taken against you.


COMPETENT AUTHORITY

Mst. Bushra Begum, SST
GGMS Shala Khel Nowshera

A
Aux-I
34
6

To,

Inquiry Officer,

Subject: REPLY TO SHOW CAUSE NOTICE

I, Mst. Bushra Begum SST GGMS Shala Khel Nowshera submit my reply to the Show Cause notice to your Honour and benevolent consideration as I am sanguine that your Honour will accept my reply to the show cause notice:

Respectfully Sheweth,

1. That the said show cause notice is illegal, unlawful, void and without jurisdiction.
2. That the same is against the principle of natural justice also.
3. That allegations leveled against me in the show cause notice is illegal void as the Sanad obtained by me is according to law and procedure because the "Darulullom" was registered with education department, but the inquiry officer did not took notice of the said registration, it is also brought in your kind notice that so many other teacher still serving in Education Department also appointed through the said Sanad and at the time of appointment the certificate had duly been verified by education department, and not only this but according to the Education Department rule and

procedure the whole educational documents have been duly verified each and every year also. So the whole allegations is based on malafide intentions just to the hairs and mentally tortured me and my family, as I am only bread winner for my family, because my husband has been died and I have to look after my four little daughters and if there is any illegality or irregularity, then the competent authority at the time of my appointment i.e. 17/01/1998 will have ample power to cancel my appointment order.

4. That the allegations in the show cause notice no.2 is baseless and without jurisdiction because I was appointed as T.T. Teacher on 17/01/1998, while I appeared in BA Part I Examination in year 1997 and then the BA part II examination, the session has almost completed and then I joined the services, and for BA Part II examination I obtained permission from my High Ups so after appointment I was not in position to cancel my admission rather I adopted legal procedure to complete BA degree Course, during that period I performed my duties to the utmost satisfaction of my high-ups and never gave any chance of complaint to my high Ups.

5. That allegations leveled against me in show cause notice is highly baseless and liable to be set aside as the whole procedure adopted by me, was legal and lawful because I took migration certificate from Peshawar University at that time and then I appeared in B.Ed examination at Shah Abdul

(36)
(4)

Latif University as private candidate, the whole procedure is legal and genuine one and I requested the competent authority to verified my degree there from the said university and the competent authority will be able to understand the whole situation as the whole allegations which is based upon a complaint is illegal and unlawful and there is malafide intention because I obey the law of land and also obey the rule and regulation of department also.

6. That the allegations leveled against me in the show cause notice NO. 4, is without facts and jurisdiction because it is impossible to get admission in High Program without having requisite qualification for the same, but this fact has totally ignored by the competent authority also, which is against the law, facts and also against the rules and procedure of education department. It is also portent to bring into your kind notice that Shah Abdul Latif University did not object and the same B.Ed degree had also been verified time and again by the education department also. So the said allegation may please be set aside according to law.
7. That public service commission is recognized department for recruitment in the whole province of Khyber Pakhtunkhwa and before appointment they had thoroughly checked all the educational documents not only from the concerned department but also from the concerned university also. So in my case the PSC KPK also adopted the same procedure

(37)

(3)

and after due satisfaction my appointment order had been issued as according to law.

8. That from the last 18 years I am serving Education Department to the utmost satisfaction of my high ups and never face any inquiry before this and nor I received any adverse remarks in my annual ACR as I have unblemished service record.

So, it is therefore most humbly requested that on acceptance of this reply to the how cause notice that allegations leveled against me may please be set aside and the show cause notice may please be withdrawn as according to law and in the best interest of justice.

Dated: 19/7/2026



MST. BUSHRA BEGUM

W/o Syed Jamil Shah

Presently serving as

SST GGMS Shela Khel,

District Nowshera



OFFICE OF THE
ADMINISTRATOR AUQAF
KHYBER PAKHTUNKHWA

Eidgah Charsadda Road, Peshawar
Phone: 2043428 Fax: 2043427

No. 2041/16/11/1

Dated // 10/12/2017

To:

Miss: Farhat,
Retired Principal,
Govt. Girls Degree College Rustam, Mardan

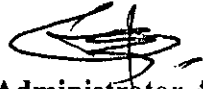
Subject: **OPEN ENQUIRY NO. 90/2016 EDUCATION AGAINST MISS BUSHRA (SST)
EDUCATION DEPARTMENT, DISTRICT NOWSHERA**

Reference your application dated "Nil", on the subject noted above.

It is submitted that this office has already sent a letter to EDO, Nowshera vide No. 9042/ME/Auqaf, dated 21.12.2005 within detail, (copy enclosed), that this Darul Uloom was recognized by the Education Department since 18.12.1978. (copy enclosed)

Therefore, students (Male & Female) who wanted to appear in the examination as private candidates, were allowed, in case of passing the examination and then the successful candidates were issued Sanad accordingly.

Hence the Sanad issued to private candidates including Miss: Bushra Begum D/O Nawab Ali Khan R/O District Nowshera under Roll No. 187, dated 29.04.1996 may be considered in the light of the above factual position.


Administrator Auqaf
Khyber Pakhtunkhwa
Peshawar


Ans K.

OFFICE OF THE PRINCIPAL GOVT. GIRLS DEGREE COLLEGE NOWSHERA

(39)

ATTENDANCE CERTIFICATE

It is certify that Miss. Bushra Begum D/O Nawab Ali Khan was a late college student of this institution, under Roll No. 178, Registration No. 96-NG-1408, Session 1996-97. Moreover our college complete record is destroyed in 2010, flood.


PRINCIPAL
Govt. Girls Degree College
Nowshera 24-10-2016
Principal
Govt. Girls Degree College
Nowshera

Handwritten signature or name in Arabic script, possibly reading "Said bin..."

Handwritten signature or name in Arabic script, possibly reading "Abdullah bin..."

BEFORE THE *Khyber pakhtunkhwa Service Tribunal*

SA/No.829/2018

Bushra Beugm..... Petitioner

Versus

Secretary E&SE KP, Peshawar and others..... Respondents

INDEX

S.No.	Description of documents.	Annexure	Pages.
1.	Replication on behalf of petitioner		1-3
2.			
3.	Copy of BA DMC Part-I	R/1	4
4.	Copy of BA DMC Part-II	R/2	5
5.	Copy of Late College Student Certificate in original by Principal GGDC, Nowshera	R/3	6
6.	Copy of Attendance / Record destruction Certificate by Principal GGDC	R/4	7
7.	Copy of Application for attendance"	R/5	8
8.	Copy of appellant order as TT dated 17.11.1998	R/6	9-10

W/O

Petitioner

Through

Amjad Ali
Amjad Ali (Mardan)

Advocate

Supreme Court of Pakistan

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE PESHAWAR

SA No.829/2018

Bushra Beugm..... Petitioner

Versus

Secretary E&SE KP, Peshawar and others..... Respondents

REPLICATION ON BEHALF OF PETITIONER

Sir,

PRELIMINARY OBJECTIONS:

All the preliminary objections are misconceived, incorrect, hence denied.

ON FACTS:

1. That Para-1 of appeal is correct and that of reply is incorrect, hence denied.
2. That Para-2 of appeal is correct and that of reply is incorrect, hence denied.
3. That Para-3 of appeal has been admitted as correct.
4. That Para-4 of reply is incorrect, hence denied.
5. That Para-5 of appeal is correct that of the reply is incorrect, hence denied. However, respondent did not deny exoneration of appellant through Denovo Inquiry Report dated 07.04.2017.
6. That Para-6 of appeal is correct and that of reply is incorrect, hence denied.
7. That Para-7 of appeal is correct and that of reply is incorrect, hence denied.

8. That Para-8 of appeal is correct and that of reply is incorrect, hence denied. (2)

GROUNDS

- A. Ground "A" appeal is correct and that of reply is incorrect, hence denied. Moreover, respondent didn't deny that charge sheet/ statement of allegations has been given.
- B. Ground "B" appeal is correct and that of reply is incorrect, hence denied. Respondent didn't deny that on fact finding inquiry dated 17.03.2016 appellant is dismissed from service.
- C. Ground "C" appeal is correct and that of reply is incorrect, hence denied.
- D. Ground "D" appeal is correct and that of reply is incorrect, hence denied.
- E. Ground "E" appeal is correct and that of reply is incorrect, hence denied.
- F. Ground "F" appeal is correct and that of reply is incorrect, hence denied.
- G. Ground "G" appeal is correct and that of reply is incorrect, hence denied.
- H. Ground "H" appeal is correct and that of reply is incorrect, hence denied.
- I. Ground "I" appeal is correct and that of reply is incorrect, hence denied.
- J. Ground "J" appeal is correct and that of reply is incorrect, hence denied.
- K. Ground "K" appeal is correct and that of reply is incorrect, hence denied.

L. Ground "L" appeal is correct and that of reply is incorrect, hence denied. (3)

M. Ground "M" appeal is correct and that of reply is incorrect, hence denied.

N. Ground "N" appeal is correct and that of reply is incorrect, hence denied.

O. Ground "O" appeal is correct and that of reply is incorrect, hence denied.


P. Ground "P" appeal is correct and that of reply is incorrect, hence denied.

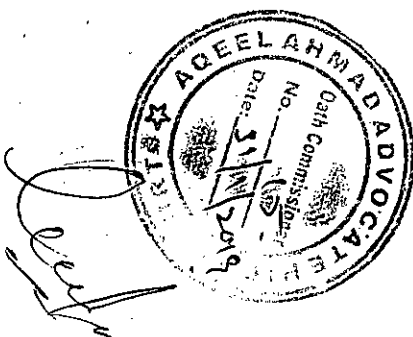
Q. Ground "Q" of appeal has not been specifically denied, means admission. BA DMC Part-I is Annex "R/1", BA DMC Part-II is Annex "R/2", Late College Student Certificate in original by Principal GGDC, Nowshera is Annex "R/3", Attendance / Record destruction Certificate by Principal GGDC is Annex "R/4", Application for attendance is Annex "R/5", appellants order as TT dated 17.11.1998 is Annex "R/6".

It is, therefore, humbly prayed that ~~my~~ petition my please be Accepted with cost alongwith.


Petitioner

Through


Amjad Ali (Mardan)
Advocate
Supreme Court of Pakistan





UNIVERSITY OF PESHAWAR
(Pakistan)

Ann-R/L 013433

(4)

B.A. Part-1 Examination, 1997

Detailed Marks Certificate

Roll No. 13433

Mr. / Ms. Bushra Begum
Certified that the subjects offered and marks obtained by the candidate are as under:

S U B J E C T S	M A R K S		
	MAXIMUM	O B T A I N E D :	
		In figures	In Words
1. English	75	26	Twenty six
2. Punjabi	75	37	Thirty seven
3. Pakistan Studies	75	59	Fifty nine
4. Islamiyat (Compulsory)	60	38	Thirty eight
		/	/
TOTAL	285	160	One hundred and sixty

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a WHOLE / IN PARTS.

Result Declaration Date _____

Date _____

Controller of Examinations,
University of Peshawar.

Amjad Ali
ADVOCATE
SUPREME COURT

UNIVERSITY OF PESHAWAR

(PAKISTAN)

No. 080180



Ann R/12
(5)

DETAILED MARKS CERTIFICATE

Roll No. 20150

B.A. PART - II EXAMINATION. 1999 (Annual/Supplementary)

Name Bushra Begum

Father's Name Muhammad Ali Durrani

Certified that the candidate secured the following marks and is placed in II Division.

S U B J E C T S	M A R K S O B T A I N E D		
	M A X I M U M M A R K S	I N F I G U R E	M A R K S I N W O R D S
1. English	75	24	Twenty four
2. Pashto	75	42	Forty two
3. Islamic Studies	75	40	Forty only
4. Pakistan Studies	40	23	Twenty three
B.A. Part - I marks	285	160	One hundred & sixty only
TOTAL	550	229	Two hundred & twenty nine


Errors & omissions are subject to subsequent rectification.


The Examination was taken as a Whole / in Parts.

RESULT DECLARATION DATE _____

CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Date _____


Amjad Ali
 ADVOCATE
 SUPREME COURT


 Assistant District Officer
 Peshawar
 Nowshera


Ans - R103


OFFICE OF THE PRINCIPAL GOVT. GIRLS DEGREE COLLEGE NOWSHERA

(6)

ATTENDANCE CERTIFICATE

It is certify that Miss. Bushra Begum D/O Nawab Ali Khan was a late college student of this institution, under Roll No. 178, Registration No. 96-NG-1408, Session 1996-97. Moreover our college complete record is destroyed in 2010, flood.


PRINCIPAL
Govt. Girls Degree College
Nowshera
Principal
Govt. Girls Degree College
Nowshera
24-10-2016


Go Amjad Ali
ADVOCATE
SUPREME COURT

حضرت جناب پرنسپل صاحبہ گورنمنٹ گرلز ڈگری کالج نوشہرا

Ans R14

عنوان: لیٹ کالج سٹوڈنٹس کی تحریری وضاحت

(7)

جناب عالیہ!

مؤدبانہ گزارش ہے کہ سائلہ کو سائلہ کی درخواست نمبر

24¹⁰ پر Attendance سرٹیفکیٹ کالج سے جاری شدہ ہے جس کے

2016

مطابق سائلہ کو بطور لیٹ کالج سٹوڈنٹ ظاہر کیا گیا ہے اب سائلہ

کو برائے مزید کارروائی چھلکانہ لیٹ کالج سٹوڈنٹس کی تحریری وضاحت

دراکار ہے جس کے لیے سائلہ عاجزانہ استدعا کرتی ہے۔ سائلہ اور اسکی چار

بہنیں پچھلیاں تاحیات دعائیں دیں گی۔ نقل درخواست Attendance سرٹیفکیٹ

لغیہ

عمر حسنہ

سائلہ بشری بیگم دفتر نواب علی خان

سکنہ نوشہرہ قلاں

مورخہ 03 07 2018

نوٹ: لیٹ کالج سٹوڈنٹس کا وہ طلبہ ہے کہ سٹوڈنٹس بھاری اس

اجیٹ ہو اور لیٹ میں آکر اسکی کوئی دیکھ کر قتل ہو جائے تو وہ

بھاری ادارہ کی Strenuous دیکھیں گی اور ہم اسکو لیٹ کالج

سٹوڈنٹس کہتے ہیں۔

Principal
Govt. Girls Degree College
Nowshera

حضرت جناب پرنسپل صاحبہ گورنمنٹ ٹرنرز ڈگری کالج نوشہرہ

عنوان :- حصول حاضری ریکارڈ وزیر قانون RTI

(8)

جناب عالیہ! گزارش کی جاتی ہے کہ سائلہ زیر رجسٹریشن نمبر 1408-NG-96-96 کالج پبلسٹیٹن 1996 تا 1997 ریگولر طالبہ ہجرتے بی۔ اے کی تھی۔ سائلہ نے بی۔ اے بلور لیٹ کالج سٹوڈنٹ زیر رول نمبر 80180 سیشن 1999 پاس کی تھی۔ اب سائلہ کو مذکورہ سیشن 1996 تا 97 کی حاضری ریکارڈ جو کچھ بھی ہو بمطابق تادیب RTI معقہ طور پر صہیا فرمایا جائے کیونکہ اسکی سائلہ کو مستند ضرورت ہے۔ اگر کسی نالزیرہ بیادتی بنا پر آپ جناب مذکورہ ریکارڈ میں کسلی تو وہ بھی تحریری طور پر طبعہ وجوہ صہیا فرمائی جائیں۔ سائلہ اور اسکی چار سہمہ بچیاں آپ کو شصت دہائی دیں گی۔

عرفی (صہیا)

Date:-


24/10/2016

سائلہ بشیرہ بیگم دختر نواب علی خان
سکنہ نوشہرہ قلعہ

کاپی برائے اطلاع و ضروری کارروائی :-
1- سکریٹری ہائبرڈ ریگولیشن ڈیپارٹمنٹ KPK پشاور -

2- کمیشنر (RTI) Right to information

3- ڈائریکٹر انٹرنیٹ اینڈ مسٹری ایجوکیشن KPK پشاور -


ADVOCATE
SUPREME COURT

OFFICE OF THE DISTRICT EDUCATION OFFICER (M&F) SECONDARY NOWSHERA.

APPOINTMENT

Consequent upon the Selection by the Departmental Selection Committee, District Nowshera. The following TT Teachers (Female) are appointed at the schools noted against their names in BPS-07 at (Rs.1480-31-2695) plus usual allowances as admissible under the rules with immediate effect to the following existing terms and conditions.

S.#	Name and Address	Date of Birth	No in Intev; M/List	Score	Name of School.	Vacant Post
1.	Bushra Begum D/o Nawab Ali Durrani Moh: Bara Khel Nowshera Kalan.	04.04.78	2/13	66	GGMS, Dheri Kati Khel Nowshera	TT V/Post
2.	Kosar Khalid D/o Khalid Ahmad Opposite Imam Bara Saddar Bazar Risalpur	10.04.78	3/38	65	GGMS, Kotli Kala Nowshera	TT V/Post
3.	Nigena Nazneen D/o Fida Muhammad Armour Housing Society Manki Road Nowshera.	11.02.68	4/3	63	GGMS, Manki Sharif NSR	TT V/Post
4.	Faresa Begum D/o Muhammad Idrees Shah Moh: Qasim Khel Cheshmai PO Akora Nowshera.	05.01.75	5/7	62	GGMS, Chashmai Nowshera	TT V/Post
5.	Rafyat Hussain D/o Ghyyas Ahmad Moh: Sheikh Ala Din Akora Khattak Nowshera.	01.09.77	6/25	62	GGMS, Kahu Nowshera	TT V/Post
6.	Roheena Naz D/o Abdul Wakeel Village Aza Khel Balá NSR.	05.05.79	7/18	62	GGMS, Tarkha Nowshera	TT V/Post
7.	Nasra Iqbal D/o Muhammad Iqbal 344/1 Moh: Durrani Street Nowshera Cantt.	01.01.72	8/2	61	GGMS, Inzari Nowshera	TT V/Post
8.	Sitara Gul D/o Aurangzeb Village Aza Khel Nowshera.	01.01.73	9/6	61	GGMS, Bara Banda	TT V/Post
9.	Mubshira Saleem D/o Muhammad Saleem Aman Garh NSR.	18.02.75	10A/10	61	GGHS, Jalozai.	TT V/Post
10.	Perveen Akhtar TT GGHS Jalozai	Adjusted at			GGMS, Risalpur Cantt.	TT V/Post
11.	Nazaneen Akhtar TT GGMS, Manki Sharif NSR	Adjusted at			GGHS, Rashaki.	TT V/Post

TERMS AND CONDITIONS.

1. They will be governed by each rules & regulation as may be prescribed by the Govt: from time to time for the category of the Government Servants to which they belong.
2. Their Services will be liable to termination on one month's notice from either side. In case of resignation without notice, one month pay will be forfeited in lieu thereof.
3. The should join the posts with in one month of issue of this Notification.

[Signature]
ADVOCATE
SUPREME COURT

Better copy

BETTER COPY

(10)

4. Charge report should be submitted to all concerned.
5. Their original Certificate/ Degrees/ Sand should be checked and verified from concerned University/BISE/RDE and Islamic madrassas concerned before handing over charge by the Principal/ Headmistress of the concerned schools.
6. Service Books of the Teacher's concerned must be prepared complete in all respect after taking over charge.
7. Their declaration of assests should be obtained and be kept in safe custody by the Principal/ Headmistress concerned.
8. They are required to produce and age certificate from Medical authority before taking over charge in case of new servants.
9. No TA/DA is allowed.
10. The above selection has been made on the following criteria:-

	I	II	III	IV
1. SAND/MATRIC	50	35	20	
2. FA/FSc	10	7	5	
3. BA/BSc	13	10	7	
4. MA/MSc	17	14	10	

Sd/-

DISTRICT EDUCATION OFFICER(M&F),
SECONDARY NOWSHERA.

Endst:No. 915-33/F.HSE-5/TT/Appointments(F) dated: 17.11.1998

Copy forwarded for information and necessary action to the:-

1. P.S to Minister for Education NWFP, Peshawar.
2. P.S to Secretary to Govt: of NWFP, Education Department, NWFP, Peshawar.
3. PA to Director of Secondary Education NWFP, Peshawar.
4. Divisional Director of Education (S), Peshawar Division Peshawar.
5. District Accounts Officer, Nowshera.
6. Headmistress Govt: Girl High School Concerned.
7. Headmistress Govt: Girls Middle Schools concerned.
8. Candidate concerned.
9. Pay clerk (Female) Section local office.
10. P/File.

Sd/-

DISTRICT EDUCATION OFFICER(M&F),
SECONDARY NOWSHERA.

Amjad Ali
ADVOCATE
SUPREME COURT

BEFORE THE *Khyber Pakhtunkhwa Service Tribunal*

No.829/2018

Bushra Beugm..... Petitioner

Versus

Secretary E&SE KP, Peshawar and others..... Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1.	Replication on behalf of petitioner		1-3
3.	Copy of BA DMC Part-I	R/1	4
4.	Copy of BA DMC Part-II	R/2	5
5.	Copy of Late College Student Certificate in original by Principal GGDC, Nowshera	R/3	6
6.	Copy of Attendance / Record destruction Certificate by Principal GGDC	R/4	7
7.	Copy of Application for attendance"	R/5	8
8.	Copy of appellant order as TT dated 17.11.1998	R/6	9-10

VPD

Petitioner

Through

Amjad Ali
Amjad Ali (Mardan)

Advocate

Supreme Court of Pakistan

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE PESHAWAR

No.829/2018

Bushra Beugm..... Petitioner

Versus

Secretary E&SE KP, Peshawar and others..... Respondents

REPLICATION ON BEHALF OF PETITIONER

Sir,

PRELIMINARY OBJECTIONS:

All the preliminary objections are misconceived, incorrect, hence denied.

ON FACTS:

1. That Para-1 of appeal is correct and that of reply is incorrect, hence denied.
2. That Para-2 of appeal is correct and that of reply is incorrect, hence denied.
3. That Para-3 of appeal has been admitted as correct.
4. That Para-4 of reply is incorrect, hence denied.
5. That Para-5 of appeal is correct that of the reply is incorrect, hence denied. However, respondent did not deny exoneration of appellant through Denovo Inquiry Report dated 07.04.2017.
6. That Para-6 of appeal is correct and that of reply is incorrect, hence denied.
7. That Para-7 of appeal is correct and that of reply is incorrect, hence denied.

8. That Para-8 of appeal is correct and that of reply is incorrect, hence denied. (2)

GROUNDS

- A. Ground "A" appeal is correct and that of reply is incorrect, hence denied. Moreover, respondent didn't deny that charge sheet/ statement of allegations has been given.
- B. Ground "B" appeal is correct and that of reply is incorrect, hence denied. Respondent didn't deny that on fact finding inquiry dated 17.03.2016 appellant is dismissed from service.
- C. Ground "C" appeal is correct and that of reply is incorrect, hence denied.
- D. Ground "D" appeal is correct and that of reply is incorrect, hence denied.
- E. Ground "E" appeal is correct and that of reply is incorrect, hence denied.
- F. Ground "F" appeal is correct and that of reply is incorrect, hence denied.
- G. Ground "G" appeal is correct and that of reply is incorrect, hence denied.
- H. Ground "H" appeal is correct and that of reply is incorrect, hence denied.
- I. Ground "I" appeal is correct and that of reply is incorrect, hence denied.
- J. Ground "J" appeal is correct and that of reply is incorrect, hence denied.
- K. Ground "K" appeal is correct and that of reply is incorrect, hence denied.

L. Ground "L" appeal is correct and that of reply is incorrect, hence denied. (3)

M. Ground "M" appeal is correct and that of reply is incorrect, hence denied.

N. Ground "N" appeal is correct and that of reply is incorrect, hence denied.

O. Ground "O" appeal is correct and that of reply is incorrect, hence denied.


P. Ground "P" appeal is correct and that of reply is incorrect, hence denied.

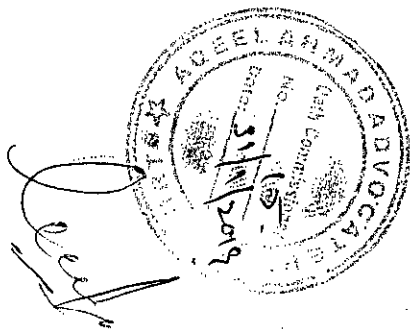
Q. Ground "Q" of appeal has not been specifically denied, means admission. BA DMC Part-I is Annex "R/1", BA DMC Part-II is Annex "R/2", Late College Student Certificate in original by Principal GGDC, Nowshera is Annex "R/3", Attendance / Record destruction Certificate by Principal GGDC is Annex "R/4", Application for attendance is Annex "R/5", appellant order as TT dated 17.11.1998 is Annex "R/6".

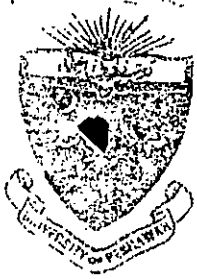
It is, therefore, humbly prayed that ~~serve~~ petition my please be ~~accepted~~ with cost alongwith.


Petitioner

Through


Amjad Ali (Mardan)
Advocate
Supreme Court of Pakistan





UNIVERSITY OF PESHAWAR
(Pakistan)

Ann-R/1 No. 013433

(4)

B.A. Part-1 Examination, 1997

Detailed Marks Certificate

Mr. / Ms. _____

Bushra Begum

Roll No. 13433

Certified that the subjects offered and marks obtained by the candidate are as under:

SUBJECTS	M A R K S		
	MAXIMUM	O B T A I N E D	
		In figures	In Words
1. English	75	26	Twenty six
2. Pashto	75	37	Thirty seven
3. Islamic Studies	75	59	Fifty nine
4. Islamiyat (Compulsory)	60	38	Thirty eight
		/	/
TOTAL	285	160	As indicated by the marks

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a WHOLE / IN PARTS

Result Declaration Date _____

Date _____

Controller of Examinations,
University of Peshawar.

Amjad Ali
ADVOCATE
SUPREME COURT

UNIVERSITY OF PESHAWAR

(PAKISTAN)

No 080180

Ann R/12
(5)



DETAILED MARKS CERTIFICATE

B.A. PART - II EXAMINATION. 1999 (Annual/Supplementary)

Roll No 20180

Name Bushra Begum

Father's Name Muhammad Ali Durrani

Certified that the candidate secured the following marks and is placed in V Division.

S U B J E C T S	M A R K S O B T A I N E D		
	M A X I M U M M A R K S	I N F I G U R E	M A R K S I N W O R D S
1. English	75	24	Twenty four
2. Pashto	75	42	Forty two
3. Islamic Studies	75	60	Forty six
4. Pakistan Studies	40	23	Twenty three
B.A. Part - I marks	285	160	One hundred & sixty
TOTAL	550	209	Two hundred & eight nine

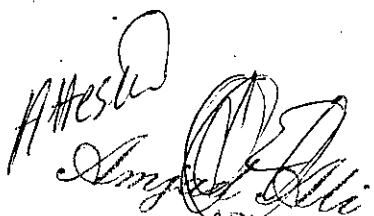
Errors & omissions are subject to subsequent rectification.

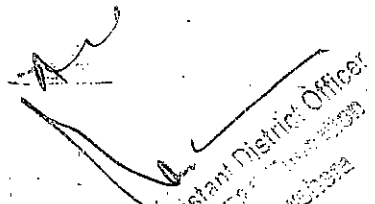
The Examination was taken as a Whole / in Parts.

RESULT DECLARATION DATE _____

Date _____

CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR


 ADVOCATE
 SUPREME COURT


 Assistant District Officer
 Examinations
 Nowshera


OFFICE OF THE PRINCIPAL GOVT. GIRLS DEGREE COLLEGE NOWSHERA


Ans - R1 3

(6)

ATTENDANCE CERTIFICATE

It is certify that Miss. Bushra Begum D/O Nawab Ali Khan was a late college student of this institution, under Roll No. 178, Registration No. 96-NG-1408, Session 1996-97. Moreover our coilege complete record is destroyed in 2010, flood.


PRINCIPAL
Govt. Girls Degree College
Nowshera 24-10-2016
Principal
Govt. Girls Degree College
Nowshera


Go *Amjad Ali*
ADVOCATE
SUPREME COURT

خدمت جناب پرنسپل صاحبہ گورنمنٹ گرلز ڈگری کالج نوشہرہ

Ans R14

عنوان: لیٹ کالج سٹوڈنٹ کی تحریری وضاحت (7)

جناب عالیہ!

موردبانہ گزارش ہے کہ مسائل کو مسائل کی درخواست پھر

۱۰/۲۰۱۶ Attendance سرٹیفکیٹ کالج سے جاری شدہ ہے جس کے

مطابق سائل کو بطور لیٹ کالج سٹوڈنٹ ظاہر کیا گیا ہے اب سائل کو برائے مزید کاروائی چھاننے، لیٹ کالج سٹوڈنٹ کی تحریری وضاحت درکار ہے جس کے لیے سائل عاجزانہ استدعا کرتی ہے۔ سائل اور اسکی چار یتیم بچیاں تاحیات دعائیں دیں گے۔ نقل درخواست Attendance سرٹیفکیٹ لگیں۔

محمد صدق

سائل بشری بیگم دفتر نواب علی خان سکند نوشہرہ قلاں

نوشہرہ ۰۳/۰۷/۲۰۱۸

نوٹ: لیٹ کالج سٹوڈنٹ کی وضاحت طلب ہے کہ سٹوڈنٹ پیارو ایس

اجسٹریٹریٹ سولر لبر میں آکر اسکی کوئی دستخط منسلک ہو جائے تو وہ پیارو ادارہ کی Strengthening میں رہے گی اور میں اسکو لیٹ کالج سٹوڈنٹ کہنے سے

Principal Govt Girls Degree College

Annex R/S
عنوان :- حصول حاضری ریکارڈ وزیر قانون RTI

(8)

جناب عالیہ! گزارش کی جاتی ہے کہ سائلہ زیر رجسٹریشن نمبر 1408-N-96-96 کالج پریز اسٹین 1996 تا 1997 ریگولر طالبہ ہجرتے بی-اے تھی۔ سائلہ نے بی-اے بلور لیٹ کالج سٹوڈنٹ زیر رول نمبر 80180 سیشن 1999 پاس کی تھی۔ اب سائلہ کو مذکورہ سیشن 1996 تا 97 کی حاضری ریکارڈ جو کچھ بھی ہو بمطابق قانون RTI منفقہ طور پر مہیا فرمایا جائے کیونکہ اسکی سائلہ کو شدید ضرورت ہے۔ اگر کسی ناگزیر وجہ سے یہ سائلہ کو مہیا فرمائی جائے۔ سائلہ اور اسکی چار بیٹھیم بچیاں آپ کو ناميات دعائیں دیں گی۔

عرض (عہدہ)

Date:- 24/10/2016

سائلہ بشیر بیگم دختر نواب علی خان
سکنہ نوشہرہ قلعہ

- کامی ہوائے اطلاع و ضروری کارروائی :-
- 1- سکریٹری فائبر ڈیپارٹمنٹ ڈیپارٹمنٹ KPK پشاور -
- 2- کمشنر (RTI) Right to information
- 3- ڈائریکٹر ایڈمنسٹریشن اینڈ سٹڈیز ایجوکیشن KPK پشاور -

Advocate
SUPREME COURT

OFFICE OF THE DISTRICT EDUCATION OFFICER (M&F) SECONDARY NOWSHERA.

APPOINTMENT

Consequent upon the Selection by the Departmental Selection Committee, District Nowshera. The following TT Teachers (Female) are appointed at the schools noted against their names in BPS-07 at (Rs.1480-31-2695) plus usual allowances as admissible under the rules with immediate effect to the following existing terms and conditions.

(9)

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10.	Perveen Akhtar TT GGHS Jaloza.	Adjusted at			GGMS, Risalpur Cantt.	TT V/Post
11.	Nazaneen Akhtar TT GGMS, Manki Sharif NSR	Adjusted at			GGHS, Rashaki.	TT V/Post

TERMS AND CONDITIONS.

1. They will be governed by each rules & regulation as may be prescribed by the Govt: from time to time for the category of the Government Servants to which they belong.
2. Their Services will be liable to termination on one month's notice from either side. In case of resignation without notice, one month pay will be forfeited in lieu thereof.
3. The should join the posts with in one month of issue of this Notification.

ADVOCATE
SUPREME COURT

Better copy

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(10)

4. Charge report should be submitted to all concerned.
5. Their original Certificate/ Degrees/ Sand should be checked and verified from concerned University/BISE/RDE and Islamic madrassas concerned before handing over charge by the Principal/ Headmistress of the concerned schools.
6. Service Books of the Teacher's concerned must be prepared complete in all respect after taking over charge.
7. Their declaration of assets should be obtained and be kept in safe custody by the Principal/ Headmistress concerned.
8. They are required to produce an age certificate from Medical authority before taking over charge in case of new servants.
9. No TA/DA is allowed.
10. The above selection has been made on the following criteria:-

	I	II	III	IV
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4. MA/MSc	17	14	10	

Sd/-

DISTRICT EDUCATION OFFICER(M&F),
SECONDARY NOWSHERA.

Endst:No. 915-33/F.HSE-5/TT/Appointments(F) dated: 17.11.1998

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5. District Accounts Officer, Nowshera.
6. Headmistress Govt: Girl High School Concerned.
7. Headmistress Govt: Girls Middle Schools concerned.
8. Candidate concerned.
9. Pay clerk (Female) Section local office.
10. P/File.

Sd/-

DISTRICT EDUCATION OFFICER(M&F),
SECONDARY NOWSHERA.

Advocate
SUPREME COURT

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 1760 /ST

Dated 14/10 /2019

To


The Director E&SE
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: -

JUDGMENT IN APPEAL NO. 829/2018, MST. BUSHRA BEGUM.

I am directed to forward herewith a certified copy of Judgement dated
06.09.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.



SHAH ABDUL LATIF UNIVERSITY

KHAIRPUR, SINDH, PAKISTAN

EXAMINATIONS WING

REG. EXAM./SEC.(VERIF)/SALU/KHP: 281/16

Dated 09/05/2016

22

To

The Ms. Farida Begum
Principal

Regional Institute for Teachers Edu (F.E.)
- Dabgor (K.P.K.)

SUBJECT: VERIFICATION OF EDUCATIONAL CERTIFICATES/ DOCUMENTS

Dear Sir / Madam,

With reference to your office letter No. (NYL)

Dated 09-05-16 on the subject cited above, it is to inform you that the Educational Certificates/Documents issued by the Shah Abdul Latif University, Khairpur in favour of students/candidates detailed as under have been verified from the university record and found Correct /Genuine.

Sr. No.	Full Name of Student/Candidate	Name of Examination	Seat No	Year of Passing	Class /Grade
1	Ms. Bushra Begum S/o Nawab Ali Durrani	B.Ed. (Off Campus) (Provy)	66/4	1998 2000	7th
2					
3					
4					
5					
6					
7					
8					
9					
10					

Encl. Attached

20/05/16
(Signature)

(Signature)
Controller of Examinations
(Sen)

15