


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1398/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/09/2022	<p>The appeal of Mst. Afshan Samin presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL No. 1398 /2022


Mst. Afshan Samin VS EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with Affidavit	1-4
2.	Notification Dated 21.10.2011	"A"	5-6
3.	Charge Report	"B"	7
4.	Service Book	"C"	8-12
5.	Letter Dated 09.03.2014	"D"	13
6.	Transfer Order Dated 24.02.2015	"E"	14
7.	Impugned Notification Dated 04.04.2022	"F"	15
8.	Departmental Appeal	"G"	16
9.	Rejection Letter	"H"	17
10.	Vakalatnama		18


APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE
SUPREME COURT OF PAKISTAN

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1398 /2022

Mst. Afshan Samin, Arabic Teacher (BPS-15),
Govt. Girls Middle Talam Khan Killi, Peshawar.

.....**APPELLANT**

VERSUS

- 1- The Secretary Elementary & Secondary Education, Civil Secretariat Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (Female) Peshawar.

.....**RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUNGED ORDER DATED 04.04.2022 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE AND AGAINST THE APPELLATE ORDER DATED 13.09.2022 WHEREBY THE DEPARMETNAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS.

PRAYER:

That on acceptance of this appeal the impugned orders dated 04.04.2022 and 13.09.2022 may very kindly be set aside and the appellant may please be reinstated in the service with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was appointed as Arabic Teacher (AT) (BPS-15) at GGMS Taleem Khan Kelly Peshawar vide order dated 21.10.2011. Copy of the notification dated 21.10.2011 is attached as annexure**A.**
- 2- That the respondent took over charge on 25.10.2011 as AT Teacher at GGMS Taleem Khan, Kally Peshawar. Copy of the charge report is attached as Annexure..... **B.**

- 3- That after taking charge the petitioner started performing her duties whole heartedly, regularly, punctually and to the best of the satisfaction of high ups. Thereafter the service book of the appellant was accordingly prepared by the concerned authorities. Copy of the Service Book is attached as Annexure**C.**
- 4- That the appellant among other, performed examination duty as Invigilator for SSC examination in 2014 vide letter dated 09.03.2014. Copy of the letter dated 09.03.2014 as Annexure....**D.**
- 5- That while performing her duties up to the entire satisfaction of her high ups the appellant was transferred from GGMS Talam Khan Killi to GGMS Bar Bar Opazai Peshawar vide order dated 24.02.2015. Copy of the transfer order dated 24.02.2015 is attached as Annexure**E.**
- 6- That astonishingly the respondent department imposed major penalty of removal from service upon the appellant vide notification dated 04.04.2022. As if it was not enough in the same notification recovery of Rs.3023550/- from the appellant was also sought. Copy of the impugned notification dated 04.04.2022 as attached as Annexure.....**F**
- 7- That the appellant filed an appeal on 23.04.2022 to DE&SE Khyber Pakhtunkhwa requesting to withdraw impugned removal order issued by EDO (F) Peshawar. Copy of the Departmental Appeal with diary number 1745 dated 25.04.2022 is attached as Annexure.....**G.**
- 8- That the departmental appeal of the appellant was regretted on no good grounds vide appellate order dated 13.09.2022. Copy of the Rejection Letter is attached as Annexure**H.**
- 9- That appellant, having no other remedy, prefer the instant appeal on the following grounds amongst the others.

GROUNDS:

- A- That the action of the respondents by issuing the impugned order dated 04.04.2022 and appellate order dated 13.09.2022 are against the law, facts, norms of natural justice and materials on the record, hence not tenable in the eye of law therefore are liable to be set aside.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

-4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL No. _____/2022

MST. AFSHAN SAMIN VS EDUCATION DEPTT:

AFFIDAVIT:-

I, Mst. Afshan Samin, Arabic Teacher (BPS-15), Govt. Girls Middle Talam Khan Killi, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.


DEPONENT



"A"

-5-

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

NOTIFICATION:

Consequent upon the selection and recommendations by the District Selection Committee the competent authority is pleased to appoint the following in-service/ Fresh (Female) candidates of District Peshawar against the AT (Arabic Teacher) posts on regular basis (Non Pensionable Pensionable) at the school noted against each their name in BPS (15) of the National Pay Scale (RS.00, 000-29500) plus usual allowances as admissible under the rules on the terms and conditions given below:-

Sr	Name of the Candidate	IM No	Score	Posted at	Remarks
1	Mrs. Anida D/O Jehanzeb Khan Chankani Peshawar	01	71.21	GGMS Masho Khel Peshawar	Against Vacant Post
2	Mrs. Qurat-ul-Ain D/O Faiz Muhammad Tarnab Farm Peshawar	02	67.49	GGMS Peshawar Budhai	Against Vacant Post
3	Mrs. Shahida Jan D/O Jan Muhammad Gul Bela Peshawar	03	66.05	GGMS Nelavi Peshawar	Against Vacant Post
4	Mrs. Lubna Nooren D/O Bashir Ahmad Lahori Gate Peshawar	04	65.04	GGMS Banda Kachori Peshawar	Against Vacant Post
5	Mrs. Amina Shaikat D/O Shaikat Ali Awarafa Colony Peshawar	05	65.24	GGMS Peshawar Karyana	Against Vacant Post
6	Mrs. Nehwish D/O M. Shahid Kamal Sardar Ahmad Jan Colony Peshawar	06	63.53	GGMS Shakar Pura Peshawar	Against Vacant Post
7	Mrs. Saddam-ul-Ain D/O Sahib Zada Natha Peshawar Cantt	07	63.26	GGMS Ahmad Khel Peshawar	Against Vacant Post
8	Mrs. Foza D/O Izzat Khan Hashimnari Peshawar	08	60.38	GGHS Kaga Wala Peshawar	Against Vacant Post
9	Mrs. Aishan Samin D/O Samin Jan Chankani Peshawar	09	60.17	GGMS Taleem Khan Kelly Peshawar	Against Vacant Post
10	Mrs. Nadia D/O Faqir Muhammad Kakshal Peshawar	10	59.82	GGHS Peshawar Passani	Against Vacant Post
11	Mrs. Farkhanda Zeb D/O Aurangzeb Chankani Peshawar	11	58.62	GGHS Suleman Khel Peshawar	Against Vacant Post
12	Mrs. Anjshida Begum D/O Jan Muhammad Gul Bela Peshawar	12	57.17	GGHS Alizai Peshawar	Against Vacant Post
13	Mrs. Shahida D/O Faqir Muhammad Kakshal Peshawar	13	57.12	GGMS Peshawar Mattani	Against Vacant Post
14	Mrs. Azmat Begum D/O Arsala Khan University Road Peshawar	14	57.00	GGHS Sufaid Sung Peshawar	Against Vacant Post
15	Mrs. Samra D/O Abdul Salam Kohari Gate Peshawar	15	56.92	GGMS Bara Sheikhan Peshawar	Against Vacant Post
16	Mrs. Sumera Naz D/O Mahmood Ul Hassan Peshawar Cantt.	16	56.92	GGMS Ghari Chiragh Shah Peshawar	Against Vacant Post
17	Mrs. Samina Gul D/O Wilayat Shah Sardar Pura Peshawar	17	54.91	GGHS Urmar Miana Peshawar	Against Vacant Post
18	Mrs. Nisha Begum D/O Saif Ur Rahman Ramdas Bazar Peshawar	18	54.87	GGMS Kas Koroonia Peshawar	Against Vacant Post
19	Mrs. Alsheen D/O Mumtaz Khan Fahseel Peshawar	19	54.73	GGMS Ghari Jalal Din Peshawar	Against Vacant Post
20	Mrs. Rabia Qazi D/O Qazi Jehanzeb Chankani Peshawar Cantt	20	54.08	GGMS Feroz Abad Peshawar	Against Vacant Post

22-10-2011

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

NOTIFICATION.

Consequent upon the selection and recommendations by the District Selection Committee the competent authority is pleased to appoint the following in-service/ Fresh (Female) candidates of District Peshawar against the AT (Arabic Teacher) posts on regular basis (Non Pensionable) at the school noted against each their name in BPS (15) of the National Pay Scale (8500-200-29500) plus usual allowances as admissible under the rules on the terms and conditions given below.

S. N	Name & Father Name of the Candidate	M List No.	Score	Posted at	Remarks
1	Mst Anila D/O Jehanzeb Khan Chamkani Peshawar	1	71.24	GGMS Jogani Peshawar	Against Vacant Post
2	Mst. Qurat-ul-Ain D/O Faiz Muhammad Tarnab Farm Peshawar	2	67.49	GGMS Budai Peshawar	Against Vacant Post
3	Mst. Shahida Isr D/O Jan Muhammad Gul Bela Peshawar.	3	66.08	GGMS Nelavi Peshawar	Against Vacant Post
4	Mst. Lubna Noreen D/O Bashir Ahmad Lahori Gate Peshawar	4	65.94	GGMS Banda Kachor Peshawar	Against Vacant Post
5	Mst Amna Shaukat D/O Shaukat All Ashrafia Colony Peshawar	5	65.24	GGMS Karyana Peshawar	Against Vacant Post
6	Mst Mehwish D/O Shahid Kamal Sardar Ahmad Jan Colony Peshawar	6	63.53	GGMS Shakar Pura Peshawar	Against Vacant Post
7	Mst Sadaf-ul-Ain D/O Sahib Zada Nothia Peshawar Cantt	7	63.26	GGMS Ahmad Khel Peshawar	Against Vacant Post
8	Mst Fozia D/O Izzat Khan Hashtnagri Peshawar	8	60.38	GGHS Kaga Wala Peshawar	Against Vacant Post
9	Mst Afshan Samin D/O Samin Jan Chamkani Peshawar	9	60.17	GGMS Taleem Khan Kelly Peshawar	Against Vacant Post
10	Mst. Nadia D/O Faqir Muhammad Kakshal Peshawar	10	59.82	GGHS Passani Peshawar	Against Vacant Post
11	Mst. Farkhanda Zeb D/O Aurangzeb Chamkani Peshawar	11	58.62	GGHS Suleman Khel Peshawar	Against Vacant Post
12	Mst. Mujahida Begum D/O Jan Muhammad Gul Gul Bela, Peshawar	12	57.17	GGHS Alizai Peshawar	Against Vacant Post
13	Mst Shahida D/O Faqir Muhammad Kakshal Peshawar	13	57.12	GGMS Mattani Peshawar	Against Vacant Post
14	Mst Azmat Begum D/O Arsala Khan University Road, Peshawar	14	57.60	GGHS Sufaid Sang Peshawar	Against Vacant Post
15	Mst Saira D/O Abdul Salam Kohati Gate Peshawar	15	56.92	GGMS Barha Sheikan Peshawar	Against Vacant Post
16	Mst. Sumera Naz D/O Mahmood Ur Hassan Peshawar Cantt.	16	56.92	GGMS Garhi Chiragh Shah Peshawar	Against Vacant Post
17	Mst Samina Gul D/O Wilayat Shah Shandar Pura Peshawar	17	54.91	GGHS Urmar Miana Peshawar	Against Vacant Post
18	Mst Nishat Begum D/O Saif Ur Rehmand Ramdas Bazar Peshawar	18	54.87	GGMS Kas Korona Peshawar	Against Vacant Post
19	Mst Afsheen D/O Mumtaz Khan Tehsil Peshawar	19	54.73	GGMS Ghari Jala Din Peshawar	Against Vacant Post
20	Mst. Rabia Qazi D/O Qazi Jehanzeb Peshawar Cantt.	20	54.08	GGMS Feroz Abad Peshawar	Against Vacant Post

21. Ms. Kalsom D O Fazal Hadi Madrassa Peshawar	54	GGMS Sheikli Kellay Peshawar	Against Vacant Post
22. Miss Ruby D O Ghulam Nabi Dulzakh Road Peshawar	53/54	GGMS Peshawar	Jogani Against Vacant Post

TERMS AND CONDITIONS.

- They will be governed by such rules & regulation as may be prescribed by the Government from time to time for category of the Government servants to which they belongs.
- In case of resignation prior notice of one month should be given by the teacher concerned, other wise one month pay allowances will be forfeited in lieu thereof.
- Seniority will be determined in accordance with the merit determined by the District Selection Committee.
- Those teachers who have pension able service before 1st day of July 2001 with out any service break should be required to give option either to the benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contributory provident fund, all as to them under their new appointment.
- These appointments are purely temporary and liable to termination reverted at any stage with out any surcharge notice reason.
- These teachers will be liable to termination, reversion at any stage if their Certificates, Degrees etc. are found fake, and FIR will be lodged against them under the law and recovery of the paid salary.
- These declaration of assets should be obtained and kept in safe custody by the D.D.O concerned.
- They should take over charge of their posts with in one month after the issuance of this appointment order.
- They should produce Health and age certificate from the Civil Surgeon Peshawar.
- Charge report should be submitted to all concerned.
- D.D.O is not allowed to all Candidates.
- D.D.O concerned will not honour submit their salary bills to D.D.O till the verification of their documents.

NOTE: CHARGE WILL NOT BE HANDED OVER UNTIL THE VERIFICATION OF THEIR APPOINTMENT ORDER FROM THIS OFFICE.

(SIRAJ AHMAD)
DISTRICT COORDINATION OFFICER
CITY DISTRICT GOVT PESHAWAR

ENDS-T: NO. 208-284/DATED 21/10/2011.

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

1. PS to Secretary to Government of Khyber Pakhtunkhwa (E. & S. Education) Department Peshawar.
2. PA to Director (E. & S. Education) Khyber Pakhtunkhwa Peshawar.
3. P.S to District Coordination Officer City District Government Peshawar.
4. District Accounts Officer Peshawar with the request that the bills of the above named teachers may not be honoured till the verification of their Certificates, Degrees etc from the concerned agencies duly authenticated by this office as required under rule 115 of the APF Rules 1989.
5. Principals, Head Masters concerned with the remarks that
 (i) charge report should submit along with original fee receipt for each degree/certificate in duplicate for the purpose of verification to this office
28. PA to E.D.O (E. & S. Education) local office.
29. Assistant Programmer (E. & S. Education) local office.
30. A.D.O (Dist.) Secondary (Male) E. & S.E. Peshawar.
- 31-32 Teachers concerned.
- 33-35 Personal Files
36. Office concerned

Rahima Anees
DISTRICT OFFICER (FEMALE)
(E&S) EDUCATION PESHAWAR
2011

BETTER COPY 6

21	Mst. Kalsoom D/O Fazle Hadi Mathra Peshawar	41	54.--	GGMS Sheikh Kellay Peshawar	Against Vacant Post
22	Mst. Rubi D/O Ghulam Nabi Dalazak Road, Peshawar	22	53.94	GGMS Jogani Peshawar	Against Vacant Post

TERMS & CONDITIONS:-

1. They will be governed by such rules & regulation as may be prescribed by the govt: from time to time for the category of the Govt: servant which they belong.
2. In case of resignation prior notice of one month should be given by teacher concerned otherwise one month pay/allowances will be forfeited in lieu thereof.
3. The seniority will be determined in accordance with the merit determined by the District Selection Committee.
4. The teachers who have pension able service before 1st day July of 2001 without any service shall be required to give option either to the benefit of pension and gratuity as allowed to them under their previous terms of appointment or to avail the benefit of contribution provident fund allowed to them under their new appointment.
5. Their appointment are purely on temporary and liable to termination reverted at any stage without showing any notice or reason.
6. Their declaration of assets should be obtained and kept in safe custody by the D.D.O concerned.
7. Their service will be liable to termination or reversion at any stage if their Certificates, Degrees, NIC, Domicile and other testimonials are found fake and FIR will be lodged against them under the law and recovery of the paid salary.
8. They should take over charge of their post within one months after the Issuing of this notification order.
9. They should produce their Health and Age Certificates from the Civil Surgeon Peshawar.
10. Charged report should be submitted to all concerned.
11. TA/DA Is not allowed to all concerned.
12. DDO concerned will not submit salaries bill to DAO till the verification of their documents.

NOTE: CHARGE WILL NOT BE HANDED OVER UNTIL THE VERIFICATION OF THEIR APPOINTMENT ORDER FROM THIS OFFICE.

(SIRAJ AHMAD)
DISTRICT COORDINATOR OFFICER
CITY DISTRICT GOVT. PESHAWAR

ENDST: NO.208-284/DATED 21/10/2011.

CHARGE REPORT

"B"

-7-

I Mst. Afshan Samin D/O Samin Jan appointed as AT (Arabic Teacher)

Vide Order No. 208-284 dated 21/10/2011 i. . . took over charge on 25/10/2011 as AT teacher at
Govt Girls Middle School Taleem Khan Kelly Peshawar.

Rohio Anees
25/10/2011
District Officer (Female)
E&SE Peshawar

SERVICE BOOK

"C"
-8-

OF

Mrs

AFSHAN SAMEEN

S/o

(AT)

Designation

Department

Price : Rs. 30/-

PRINTED BY:

STATIONERY & PRINTING DEPARTMENT, GOVERNMENT OF N.W.F.P., PESHAWAR.

(For use in Police Department only)

-9-

Heirs:

- 1. _____
- 2. _____
- 3. _____

Verification Roll No. dated received back

Left Thumb Impression

Qualification	Date	Qualification	Date
English	Passed SSC (A) 1996 R.M. 162468 R.No. 2057 Sec 538/85 B Grade	First Arts	
Pushto	Passed PAF (A) 1998 R.M. 162468 M.No. 599/Nov C Grade	B.L. Or B.A.	
Urdu	Passed PAF (A) 2007	Pledership examiantion	
Plan-drawing	Pass Urdu University RAO 74307 Result on 25/9/2007	Training School Final examiantion	
Finger Print	Passed PAF (A) 2007 Urdu University RAO 74303 Result on 20-2-2007	Other qualification:-	
Drill Instructing	20-2-2007		
Court Duties	Shahadat Aahia Fy uloom Istaimiq Ahmora R.No. 6591 Mark 34/6		
Reserve Duties	Result 677-1-9-2008		

Recd A us
D. O.

N.B.— Line to be drawn under the qualification possessed.

1. _____

2. _____

3. _____

4. _____

5. _____

6. _____

7. I

8. L

o

Li

Mi

Th

Sig

0. Sign
Hea
Offic

NIC No. 17301-1352177-0

3

-10-

Note:- The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name: Afshan Samreen

2. Race: Afghan

3. Residence: Village P. Chamkani






4. Father's name and residence: Samreen Jan

Date of birth by Christian era as nearly as can be ascertained: 4-6-1981

Exact height by measurement: 5-4"
Female June 11th Eighty One

Personal marks for identification: A mole on upper lip

Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger		Ring Finger	
Middle Finger		Fore Finger	
Thumb			

Signature of Government Servant: [Signature]

Signature and designation of the Head of the Office, or other Attesting Officer: Raja Annes

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating.	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
AT G.A.S. Khan Khan Khan			RS 8500/-			25/10/2011	[Signature]
				RS 8500/-		11/2011	
				RS 9200/-		12/01/2012	
				RS 9900/-		12/2013	
				RS 10600/-		12/2014	
		B-152 B. 10985-905-38135					
				RS 13700/-		12/2015	



10	11	12	13		
			14	15	
Date of termination or appointment.	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Nature and duration of leave taken.	Leave	
				Allocation of period of leave on average pay of four months for which salary is payable to another Government.	Period.
<p>Per Arees</p> <p>D.O.</p> <p>(F) E. & S. Edu</p> <p>Peshawar;</p>				<p>12/7</p> <p>Appointed as</p> <p>Vice EDO Peshawar</p> <p>with effect from 27/10/2012</p> <p>dt. 21/11/2012</p> <p>Per Arees</p> <p>D.O.</p> <p>(F) E. & S. Edu</p> <p>Peshawar;</p>	
<p>D.O (F)</p> <p>Peshawar.</p>	<p>30/11/2012</p> <p>27/10/12</p>	<p>D.O (F)</p> <p>Peshawar.</p>		<p>release order issued vide</p>	
<p>D.O (F)</p> <p>Peshawar.</p>	<p>30/11/2013</p> <p>27/10/13</p>	<p>D.O (F)</p> <p>Peshawar.</p>		<p>the office nos 3254-87 dt 26/5/12.</p> <p>Per Arees</p>	
<p>D.O (F)</p> <p>Peshawar.</p>	<p>30/11/2014</p> <p>27/10/14</p>	<p>(F) E. & S. Edu</p> <p>Peshawar.</p>		<p>TR No: dated 12/9/12</p>	
<p>D.O (F)</p> <p>Peshawar.</p>	<p>TR NO. 910</p> <p>13/11/2014.</p>			<p>Source - I verified</p> <p>for standing of pay and allowances.</p>	
<p>D.O (F)</p> <p>Peshawar.</p>	<p>Drawn Rs. 2442/- on</p> <p>A/C of pay and allowances for the month</p> <p>of October-2014.</p>			<p>AAO (PR-2)</p> <p>11/9/12</p>	
	<p>Wd 21/11/14</p> <p>AAO</p> <p>Seti</p> <p>21/11/2014</p>			<p>TR No: 236 dated 12/9/12</p> <p>Draw Rs 171440/- on</p> <p>A/C of pay and Allowances</p> <p>w.e.f 25/10/2011 to 31/8/2012.</p>	

AAO (PR-2)

12/9/12

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION PESHAWAR

No. 33/CE/SSC/EXAM/14

Dated: 09-03-2014

"D"
-13-

Name: AFSHA SAMIN, AT

Phone: 9216262, 9216264.

Fax No: 9222037.

Address: GHSS YOUSAF ABAD

District: PESHAWAR

Subject: - EXAMINATION DUTY FOR SSC (ANNUAL) EXAMINATION COMMENCING ON MARCH 12, 2014

Memo:

It is to inform that you have been appointed as INVIGILATOR in the SSC (ANNUAL) Examination 2014, commencing on March 12, 2014, at Center No : "17" CentreName : Hudailia Model School Gulbahar.

You are directed to reach the Examination Centre ONE DAY before the commencement of Examination for making necessary arrangements.

Please note that:-

1. In case of refusal, the concerned competent authority shall initiate disciplinary action against the teachers, under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.
2. Regrets/refusal shall be entertained only in case where the near relative is appearing in the above mentioned examination. However, relationship in such cases must be supported by documentary proof.
3. "Near relative" includes wife, husband, son, daughter, brother and sister as per rules of the Board.

MOST IMPORTANT

The use of mobile phone is strictly prohibited for supervisory staff in the examination hall. In case of violation, the superintendent concerned of the examination hall will be liable for disqualification.

Note: Contingent / TA.DA bill must be submitted in the Board Office within Ten days after end of the examination.

You are further requested to provide bank account number, along with name of the bank, for paying your remuneration online.

(Mussawar Jan Durani)

Controller of Examinations

Board of Intermediate & Secondary Education, Peshawar.

Unite And Help Us In Fighting Against Cheating In Examinations

NOTE:- PLEASE SUBMIT THIS ACKNOWLEDGEMENT TO THE CONCERNED CENTER SUPERINTENDENT ON FIRST DAY OF THE EXAM.

From

Name: AFSHA SAMIN, AT

(Invigilator)

Address: GHSS YOUSAF ABAD PESHAWAR

Name of Centre: Hudailia Model School Gulbahar

To

Superintendent,
Centre No: "17"

CNIC No:

17301-1352177-0

Mobile No:

9993551167

Subject: - ACKNOWLEDGEMENT/ACCEPTANCE

Bank Name:

Mutual Bank

Memo:

Confirmed:

Branch Code/Account No:

0001 / 1010101010

Signature/Date:

[Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) PESHAWAR

Office Order:

-14- "E"

The competent authority is pleased to order the transfer of the Mst: Afshan Samin AT, GGMS Talam Khan Killi against newly upgraded vacant post at GGMS Bar Bar Opazai Peshawar on her own pay and scale in the interest of public service with effect from his taking over charge.

Note: - Charge Report should be submitted to all concerned.
No TA/DA etc is allowed.


(Samina Ghani)
District Education Officer,
(Female) Peshawar

Endst: No. 2770-73

Dated Peshawar the 24 /02/2015

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar
2. Headmistress Concerned.
3. Official Concerned.


District Education Officer,
(Female) Peshawar



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

"F"
-15-

NOTIFICATION.

1. WHEREAS Mst. Afshan Sameen (AT, BPS-15) Govt. Girls Middle School Talam Khan Killi Peshawar under transfer Govt. Girls Middle Barbar Opzai Peshawar, marked herself absent from duty with effect from 01.03.2015 without informing the office and was getting salary regularly till November 2021.
2. AND WHEREAS Mst. Sajida Begum Principal GGHSS University Town Peshawar & Sabina Yusrat SSS of same school was appointed as inquiry officer vide this office Notification No. 3623 dated 15.12.2021 to enquire against the above-named teacher who was absent from duty w.e.from 01.03.2015 till date to submit detail report.
3. AND WHEREAS Charge sheet was also issued to her vide this office letter No. 552 dated 06.01.2022.
4. AND WHEREAS the enquiry Officer has submitted report vide this office diary No. 1484 dated 25.01.2022 with the recommendations to recover the salary amount taken with effect from 01.03.2015 till November 2021 (Absent Period) & take disciplinary action against her as deem fit under the rules.
5. AND WHEREAS The competent authority, District Education Officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charges of misconduct/willful absence from duty and received salary w.e.from 01.03.2015 to November 2021 during absentia against the accused has been proved.
6. NOW THEREFORE, in exercise of the powers under Rules-4(b)iii of Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary Rules 2011), I, the competent authority District Education Officer (Female) Peshawar is pleased to impose Major Penalty of "Removal from Service" upon Mst. Afshan Sameen, AT GGMS Talam Khan Killi (Under Transfer to GGMS Barbar Opzai Peshawar) with immediate effect. The period of her absence with effect from 01.03.2015 to November 2021 is hereby treated as unauthorized absence from duty without pay. Moreover, the illegitimate payment on account of pay and allowances received by the aforesaid accused teacher during the period from 01.03.2015 to November 2021 amounting to Rs. 3023550/-(App) is liable to be recovered from her in line with rules 4(i)(a) (iii) of the E&D rules 2011.

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

Endst: No. 5361-68 /P.F Afshan Sameen/ Dated Peshawar the 04 /04/2022

Copy of the above is forwarded to the:-

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. District Monitoring Officer (EMA) Peshawar.
4. Deputy District Education Officer (Female) Local office, Peshawar.
5. Cashier local office.
6. Head Teacher, Govt. Girls Middle School Talam Khan Killi Peshawar.
7. Head Teacher, Govt. Girls Middle School Barbar Opzai Peshawar.
8. Mst. Afshan Sameen (AT) Mohalla Yaseen Khel Chamkani Peshawar with the direction to submit the amount of Rs. 3023550/-(App) (Absentia Period) in the Govt. Treasury and receipt (In Original) thereof be submitted to this office immediately otherwise legal action will be initiated against you.

Samin
04/04/2022
District Education Officer,
(Female) Peshawar.

بخدمت جناب ڈائریکٹر ایلیمینٹری اینڈ سیکنڈری ایجوکیشن صوبہ خیبر پختونخوا پشاور۔

"6"

اپیل :- withdraw removal order issued by EDO (F) Peshawar vide E.O No.

-16-

5361-68 dated 04-04-2022..

جناب عالی

نہایت ادب و احترام کے ساتھ گزارش ہے کہ سائلہ گورنمنٹ گرلز ہائی اسکول تالم خان کھلے پشاور میں بطور (BS-15) AT خوش اسلوبی سے سرانجام دے رہی تھی۔ اس کے بعد سائلہ کو 2015 میں گورنمنٹ گرلز ہائی اسکول بڑا پازری پیر ٹرانسفر (تبدیل) کر لیا گیا۔ سائلہ جب مذکورہ بالا اسکول چارج لینے کے لئے گئی تو اسکول بڑا میں وہاں کے لینڈ اوور ٹیم تھے۔ اور ان کا کہنا تھا کہ جب تک ہمارے کا اس فور میں ہاری گورنمنٹ بھرتی نہیں ہوگی ہم اسکول بڑا کو نہیں چھوڑیں گے۔ اس مسئلے کی وجہ سے میں نے سارا ماجرہ ڈسٹرک ایجوکیشن آفیسرز نامہ پشاور کے علم میں لایا اور کئی بار سائلہ نے آفس میں اسکول بڑا سے ٹرانسفر کے سلسلے میں جاتی رہے لیکن کوئی سنوائی نہیں ہوئی۔ اس دوران سائلہ تنخواہ بھی لیتی رہی اور باقاعدہ سروس بک میں انٹری بھی ہوتی رہی۔ اسکول بڑا کے ساتھ لینڈ اوور کا شو جھاتا رہا۔ اور اسکول بند تھا۔

جناب عالی

سائلہ جب آخری دفعہ اپنی تعیناتی کے سلسلے میں ڈپٹی ڈی ای و مسماۃ نادیہ چکھی سے درخواست کی اور سارا مسئلہ سنایا تو بجائے میرا مسئلہ حل کرنے کی بجائے سائلہ کو سروس سے Remove کر دیا گیا اور سائلہ کو غیر حاضری کا نوٹس دیا گیا اور نہ ہی پرسنل سنوائی کا موقع نہیں دیا گیا اور مجھے 1-03-2015 سے غیر حاضر شو کے Remove from service کر دیا گیا جو کہ سراسر نا انصافی ہے، زیادتی ہے، ظلم ہے۔

جناب عالی

جب سائلہ اتنے سال غیر حاضر تھی اور سائلہ کو تنخواہ کیوں دی جا رہی تھی۔ 2015 سے سروس بک میں انٹری کیوں لی گئی۔

کیوں سائلہ کو ایک دن بعد یا ایک مہینے بعد یا ایک سال بعد غیر حاضری کا نوٹس کیوں نہیں لیا گیا۔ جونوٹس 2022 میں میری چارج شیٹ ہوئی یہ کیوں 16-2015 یا اس کے بعد کوئی رپورٹ ہی نہیں لی کیوں میری کسی دوسرے اسکول میں تعیناتی نہیں ہوئی۔ کیوں سائلہ کو کئے بعد وہاں پر ایک اور 2019 میں ایک اور AT ٹیچر بھی تعینات کی گئی ہے آفس سٹاف کو میرے بارے میں پتہ بھی نہیں تھا۔

اس میں میرا کیا قصور ہے۔

اس لئے آپ صاحبان سے درخواست گزار ہوں کہ مندرجہ بالا حقیقت کی بناء پر ڈی ای او اسمبل پشاور کا جاری کردہ removal order ختم کیا جائے اور مجھے کسی دوسرے اسکول میں ایڈجسٹ کیا جائے کیونکہ مذکورہ اسکول میں میری جان کو خطرہ ہے۔ تاکہ سائلہ خوش اسلوبی سے اپنی ڈیوٹی سرانجام دے۔ سائلہ آپ صاحبان کو آئندہ کسی قسم کی شکایت کا موقع نہیں دوں گی۔

العارض

آپ کی فرما بردار ملازمہ

Shahida

افشاں شین، اے ٹی ٹیچر

گورنمنٹ گرلز ہائی اسکول بڑا پازری پشاور۔

موری۔ 23-04-2022

diary number

1745

dated 25/4/2022



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

"H"

AP/

-17-

No. 3468 /F.No: F-7/F/Appeal/Peshawar,

Dated Peshawar the 13/9 /2022

To

The District Education Officer,
(Female) Peshawar

Subject:- APPEAL.

Memo:

I am directed to refer to the subject cited above and to state that the appeals for reinstatement in r/o Afshan Sameen Ex-AT, GGMS Talam Khan Killi Peshawar is hereby rejected by the Competent Authority, the teacher concerned may be informed accordingly.

Endst No. _____/

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO: _____ OF 20____

Afshan Samin

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

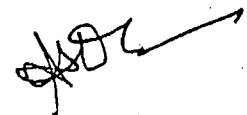
Education Deptt

(RESPONDENT)
(DEFENDANT)

I/We Afshan Samin

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Supreme Court** 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. 27 / 07 / 202



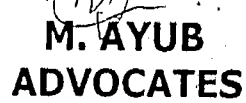
CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK
(BC-10-0853)
15401-0705985-5


UMAR FAROOQ

WALEED ADNAN

&


M. AYUB
ADVOCATES

OFFICE:
Flat No.(TF) 291-292 3rd floor
Deans trade centre Peshawar cantt:
Mobile No. 0334-5277323