

Misc. Application No. 127/2020

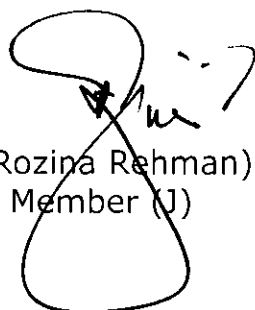
O R D E R
15.07.2022

Petitioner's husband namely Muhammad Arif Present. Mr. Shah Wali Ullah ADEO Litigation (Female) Upper Kohistan alongwith Mr. Riaz Ahmad Painsdakhel, Assistant Advocate General for the respondents present and submitted an affidavit that as per the record maintained by their office, the name of the petitioner/appellant is entered as Mst. Nazia Qazi D/O Qazi Faiz Ul Haq, therefore, respondents are having no objection on acceptance of the application submitted by the petitioner/appellant.

2. The application in hand has been submitted by petitioner, seeking correction of name of her father, which was inadvertently mentioned as Muhammad Akbar instead of Faiz Ul Haq in the Service Appeal and the said discrepancy also crept into judgment dated 27.08.2019 passed by this Tribunal in Service Appeal No. 372/2016 titled "Mst. Nazia Qazi Versus Director (E&SE), Khyber Pakhtunkhwa, Peshawar and five others". This Tribunal within the meaning of sub-section-2 of Section-7 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 is deemed as Civil Court under the Code of Civil Procedure, 1908. In view of Section-152 of CPC, this Tribunal is legally empowered to correct any mistake in judgments, decrees or orders or errors arisen therein due to an accidental slip or omission. Representative of the respondents has submitted duly sworn affidavit to the effect that the name of the appellant is entered in their record is Mst. Nazia Qazi D/O Qazi Faiz Ul Haq and the respondents are having no objection on correction of the same.

3. In view of the above, the application in hand is accepted and office is directed to correct the name of father of the petitioner/appellant as Faiz Ul Haq in the judgment dated 27.08.2019 as well as relevant record accordingly. Copy of this order be placed on file of Service Appeal No. 372/2016 as well as Execution Petition No. 35/2020. After necessary correction in the concerned judgment, certified copy of the same be sent to the respondents for information. File be consigned to the record room.

ANNOUNCED
15.07.2022


(Rozina Rehman)
Member (J)


(Salah-ud-Din)
Member (J)

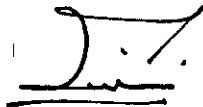
01.04.2022

Petitioner's husband namely Muhammad Arif present. Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General for the respondents present.

Vide order dated sheet dated 23.06.2021, respondents were directed to submit copy of inquiry report after its conclusion. Learned Assistant Advocate General requested that time may be granted for submission of copy of inquiry report on the next date. Adjourned. To come up for submission of inquiry report as well as further proceedings before the D.B on 09.05.2022.



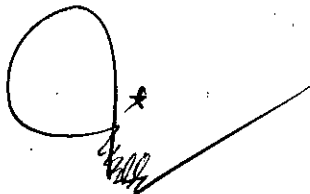
(Rozina Rehman)
Member (J)



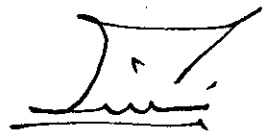
(Salah-Ud-Din)
Member (J)

09.05.2022

Petitioner's husband namely Muhammad Arif present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present and requested that an opportunity may be granted for submission of inquiry report. Last opportunity given. To come up for submission of inquiry report as well as arguments before the D.B on 15.07.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

23.06.2021

None for the appellant present.

Mr. Muhammad Adeel Butt, learned Additional Advocate General alongwith Mr. Shah Wali Ullah, ADO (Litigation) for respondents present.

The reply submitted by the respondents revealed that doubt certain tempering in the service record and for that purpose they have constituted an enquiry. Let the enquiry be concluded and thereafter, the respondents shall furnish the copy of the report for placing on file for further proceedings. on 25.10.2021 before D.B.



(Rozina Rehman)
Member(J)

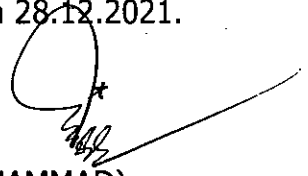


Chairman

25.10.2021

None for the petitioner present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Notices be issued to the petitioner as well as her counsel. To come up for further proceedings before the D.B on 28.12.2021.



(MIAN MUHAMMAD)
MEMBER (E)

28.12.2021

Due to Winter Vacations, the case is adjourned to 01.04.2022 for the same as before.


READER

Mist. Application 127/2020

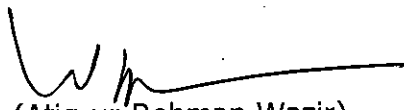
Postscript

26.05.2021

The order dated 24.03.2021 was written but could not be signed by the D.B including the then Chairman who due to unforeseen reason could not attend the office in coming days. He died in the meantime and the order sheet was left unsigned. To bring the proceedings of appeal on track, it is become expedient for ex-post facto completion of the order sheet. The unsigned order dated 24.03.2021 is reproduced below which be given effect accordingly:-

"Counsel for the petitioner and Asstt. AG for the respondents present.

Learned AAG seeks time to furnish reply to application. Adjourned to 23.06.2021 for reply and arguments before the D.B."


(Atiq-ur-Rehman Wazir)
Member


Chairman


27.01.2021

Counsel for the petitioner and Addl. AG alongwith Muhammad Siddique ADO for the respondents present.

It is observed that second copy of the application is not available. The applicant shall provide the same before next date of hearing.

Learned AAG requests for time to dig out the issue which pertains to the District Kohistan: Allowed.

To come up on 24.03.2021 for reply and arguments.


(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

24.03.2021

Counsel for the petitioner and Asstt. A.G for the respondents present.

Learned AAG seeks time to furnish reply to application. Adjourned to 23.06.2021 for reply and arguments before the D.B.

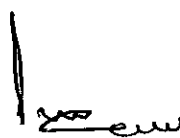

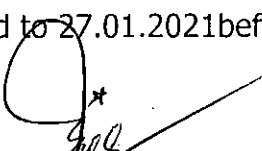

(Atiq-ur-Rehman Wazir)
Member(E)

Chairman

FORM OF ORDER SHEET

Court of _____

Misc. Application No. 127 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	11/08/2020	<p>The misc application for correction of father name of applicant in appeal no. 372/2016 submitted by Mr. Khaled Rehman Advocate, may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This misc. application be put up before D.Bench on <u>2-12-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-	02.12.2020	<p>Counsel for the petitioner present.</p> <p>Notices be issued to respondents for 27.01.2021 before the D.B. They shall submit the reply of application on the date fixed. The record of Service Appeal No. 372/2016, decided on 27.08.2019, shall also be made available by the office on next date of hearing.</p> <p>Adjourned to 27.01.2021 before the D.B.</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="text-align: center;">  (Mian Muhammad) Member(E) </div> <div style="text-align: center;">  Chairman </div> </div>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 372 /2016

Mst. Nazia Qazi..... Appellant

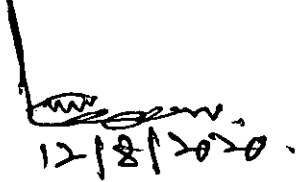
Versus

The Govt. etc.....Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Misc: Application with Affidavit			1
2.	Judgment	27.08.2019	A	
3.	CNIC of applicant		B	
4.	Wakalat Nama			

Put up to the court with relevant appeal.


12/8/2020

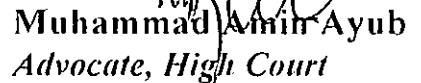
Reader.

Through

Applicant


Khaled Rahman
Advocate,
Supreme Court of Pakistan

&


Muhammad Amin Ayub
Advocate, High Court

4-B, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458
Cell # 0345-9337312

Dated: 11 /08/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 372 /2016

Mst. Nazia Qazi..... Appellant

Versus

The Govt. etc..... Respondents



APPLICATION FOR CORRECTION OF FATHER NAME OF APPLICANT.

Respectfully Sheweth,

1. That applicant had been removed from service which was challenged before this Hon'ble Tribunal in titled Service Appeal which was allowed on 27.08.2019, (Annex:-A).
2. That at the time of drafting, inadvertently, the father name of the applicant was mentioned as *Muhammad Akbar* instead of Faiz-ul-Haq as is evident from the CNIC (Annex:-B) of the applicant.

It is, therefore, humbly prayed that on acceptance of this application, the name of the father of applicant may kindly be rectified as *Faiz-ul-Haq* instead of Muhammad Akbar.

Applicant/Appellant

Through

Khaled Rahman,
Advocate, Peshawar

Dated: 11 /08/2020.

Affidavit

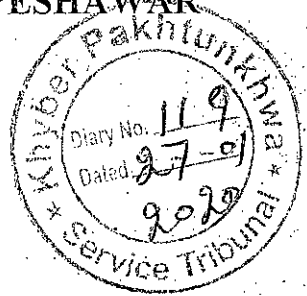
I, Mst. Nazia Qazi D/o Faiz-ul-Haq, R/o Mohallah Dagai, Banda, Qazi Abad, Tehsil & District Swabi, do hereby affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

نازیا قازی
Deponent

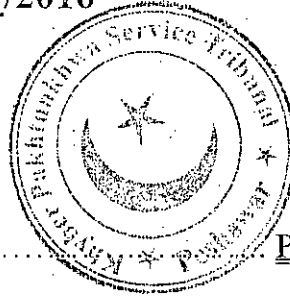
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 35 /2020

IN

Service Appeal No. 372 /2016

Mst. Nazia Qazi D/o Muhammad Akbar,
R/o village Yaqubi Tehsil Lahore Swabi,
Ex: PST Teacher GPS Razi Bahadar
Kotay Yaqoobi Swabi.....

Petitioner

Versus.

1. The Govt. of Khyber Pakhtunkhwa
through Secretary
Elementary & Secondary Education Department,
Civil Secretariat. Peshawar
2. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female)
District Kohistan.
4. District Education Officer (Female)
District Swabi.
5. District Account Officer,
District Swabi.
6. District Account Officer,
District Kohistan.....

Respondents

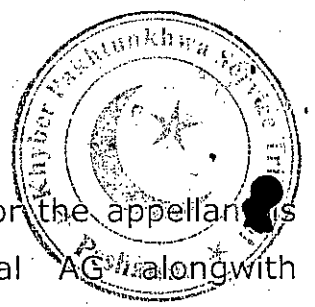
Execution Petition for directing the Respondents to implement the Judgment of this Hon'ble Tribunal dated 27.08.2019 passed in Service Appeal No.372/2016.

Respectfully Sheweth,

1. That petitioner had filed Service Appeal No.372/2016 which was allowed by the Hon'ble Tribunal vide Judgment dated 27.08.2019 (*Annex:-A*) in the following terms:

Certified to be true copy
[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Nazia Qazi
22.07.2020



Mr. Muhammad Amin Ayub, Advocate for the appellants is present. Mr. Kabirullah Khattak, Additional AG along with representatives of the department Rehana Yasmeen, District Education Officer (Female) Upper Kohistan and Mr. Muhammad Saddique, Litigation Officer are also present.

2. Learned counsel for the petitioner submitted that the judgment of this august Tribunal dated 27.08.2019 has not been implemented in its letter and spirit and undue delay in its implementation has been made to her prejudice violating her rights as the order was passed by the District Education Officer (Female) Kohistan with inordinate delay. That her colleagues having a similar grievance has been adjusted much earlier and posted in their home districts but discriminations have been meted out to petitioner she is seeking the indulgence of this Hon'ble Tribunal.

3. On the other hand, learned Additional AG submitted that the judgment referred to above passed by the Khyber Pakhtunkhwa Services Tribunal, has been implemented by virtue of reinstatement order made by the District Education Officer (Female) Kohistan on 16.07.2020 vide Endorsement bearing No. 7109-16/DEO (F) KH/liti: therefore, nothing remains to be executed before this S.B. As regard making of reference to the appeal of other Government officials, the Hon'ble Tribunal in its judgment has stipulated a definite time span within which the de-novo inquiry has to be completed whereas in the referred to judgment for implementation in the instant execution petition no period for conclusion of de-novo inquiry has been given therefore, the stance taken by the petitioner is not tenable.

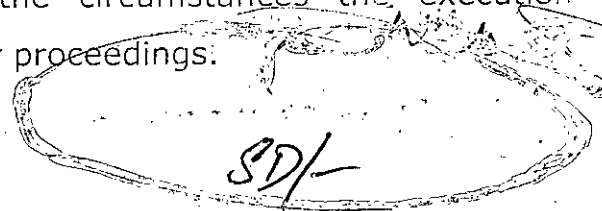
4. It is on record that by virtue of the judgment of this Tribunal dated 27.08.2019, on acceptance of appeal of petitioner, the impugned order dated 22.10.2015 was set-aside and respondents were directed to conduct de-novo inquiry strictly in accordance with law and rules. In compliance thereof the respondents by virtue of endorsement bearing no. 7109-16/DEO (F) KH/liti: made by the District Education Officer (Female) Kohistan, the judgment of this august Service Tribunal has been given effect and accordingly the petitioner has been reinstated into government

Certified to be true copy

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

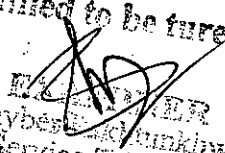
PUNJAB

service against the post of PST (B-12) at GGPS Goshali District Kohistan, subject to the result of findings of de-novo inquiry here it is to be observed with concern that the judgment passed by this Tribunal has been implemented belatedly but one may also observe that due to spread of pandemic COVID-19 there was complete lock down for a substantial period of three months which could not be ignored and that period has to be excluded when no official work was performed. As regard the posting and transfer in the home district this is the internal matter of the department which can post a civil servant to one place or another or one district or the other though the order passed in this regard should not be arbitrary or based on discrimination. Posting and transfer of a civil servant is included in his terms and conditions of service and no one is exempted from the same therefore, in case of acting upon the judgment of this Tribunal passed on 27.08.2019 no other issue remain to be pondered and consequently executed. In the circumstances the execution petition is filed without further proceedings.



(MUHAMMAD JAMAL KHAN)
MEMBER

ANNOUNCED
22.07.2020

Certified to be true copy

MEMBER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA, PESHAWAR

M.A.# 127/20
Appeal No. 372/2016

NAZIA QAZIAPPELLANT.

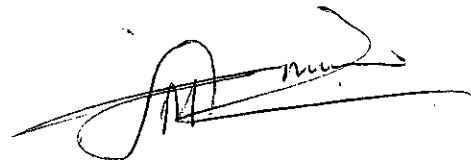
VERSUS

The Govt. etc.....RESPONDENTS.

**REPLY OF APPLICATION FILED BY THE APPELLANT FOR
CORRECTION OF FATHER NAME**

INDEX

S.No	Description of documents	Annexure	Pages
1	Comments of Respondents		1
2	Affidavit		2
3	Copy of Service Book	"A"	3-4
4	Copy of Medical Certificate	"B"	5
5	Copy of DMC & Provisional Certificate	"C" & "D"	6-7



DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN

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

M.A # 127/20
APPEAL No. 372/2016 IN

NAZIA QAZI.....APPELLANT

VERSUS

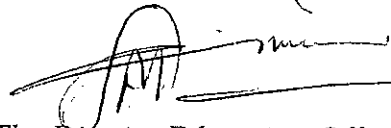
The Govt. etc.....RESPONDENTS

**REPLY OF APPLICATION FILED BY THE APPEALANT FOR CORRECTION
OF FATHER NAME ON BEHALF OF RESPONDENTS.**

FACTUAL OBJECTIONS:-

1. That the Para No.01 of the appeal is correct.
2. Reply of Para No.02 of the appeal is that as per service book the father name of the appellant is Qazi Faiz ul Haq. The requisite qualification for the post of PTC Teacher at that time was Secondary School Certificate, the appellant gained job on the basis of Secondary School Certificate. As per Secondary School Certificate the father name of the appellant is Qazi Faiz ul Haq. Further stated that the documents submitted by the appellant there is ambiguity in the documents, to clear the controversy of appellant documents the answering respondent sent her SSC Certificates for verification vide No. 869 dated 19/03/2021 It is pertinent to mention here that the thumb print in the service book of the appellant has been tempered and replaced by another, it is objectionable. The answering respondent constituted a committee to probe the matter vide Notification No.7535 Dated 19-03-2021

*(Copy of Service Book, Medical Certificate, DMC & provisional certificate
are annexed as Annexure "A", "B", "C" & "D")*


The District Education Officer,
(Female) Kohistan

BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR.

M.A # 127 / 20 IN.

APPEAL No. 372/2016

NAZIA QAZI.....APPELLANT

VERSUS

The Govt. etc.....RESPONDENTS

AFFIDAVIT

I, Mr. Muhammad Amin, District Education Officer (F) Kohistan do, hereby solemnly affirm and declare that the Para wise comments of the of the application in Service Appeal No.372/2016 titled Mst: Nazia Qazi versus Government is true to the best of my conviction and belief and nothing has been concealed from this Honorable Court.



DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN.

SERVICE BOOK

NIC No. 16202-8299245-8 ✓

Old Nicno - 13085-924812

سروس بک

Per. No. 00398866

کتاب ملازمت

NBP-Pattana A/Loto 13516-7



NIC No. 16202-8299245-8 ✓

Name	نام	Nazia Qazi
Father's Name	والد کا نام	
Qualification	قابلیت	
Designation	عہدہ	
Department	محکمہ	
Permanent Address	مستقل پتہ	

icer
an

Name NAZI'9 RAZI

(نام)

Nationality and Religion Pakistani (Razi)

(قومیت اور مذہب)

Residence Dagai Sambar

(مستقل رہائش)

Father's name and residence Razi Faizul Haq

(والد کا نام اور پتہ)

Date of birth by Christian era as nearly as can be ascertained 4-1-1985

(تاریخ پیدائش مطابق سن عیسوی)

Exact height by measurement 5-6

(قد و قامت)

Personal mark of identification N/A

(نشان شناخت)

Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Index Finger (چھنگا)

Ring Finger (چھنگیا کے ساتھ کی انگلی)

Middle Finger (انگشت میاں)

Little Finger (انگشت شہادت)

Signature of Government Servant NAZI'9 RAZI

(سرکاری ملازم کے دستخط)

Signature and designation of the Head of the office or other Attesting officer DR. DIST. OFFICER (S&J) (FEMALE) KOHISTAN

Corrigendum order issued vide EOD

KT about Residency of the Officer

Please read District Swabi instead of

Komila Encl NO: 8795-98 Dated 11/11/2008

The entries in this page should be renewed/re-aggested at least every five years

the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after

every 5 years under this rule.

اس صفحہ کے مندرجات کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر ۹ اور ۱۰ میں دستخطوں کے نیچے تاریخ لکھنی چاہئے۔

انگلیوں کے نشانات کے لیے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

Annexure B

5

MEDICAL CERTIFICATE.

Name of Official..... Nazia Dazi

Caste or race..... Dazi

Father's name..... Dazi Faizul-Haq

Residence..... Vill: Dagen Dist: Samakh

Date of birth..... 4-1-1985

Exact height by measurement..... 5' 0"

Personal mark of identification.....

Signature of the Official..... Dia

Signature of head of office..... Golam Nabi

Seal of Office..... [Signature]

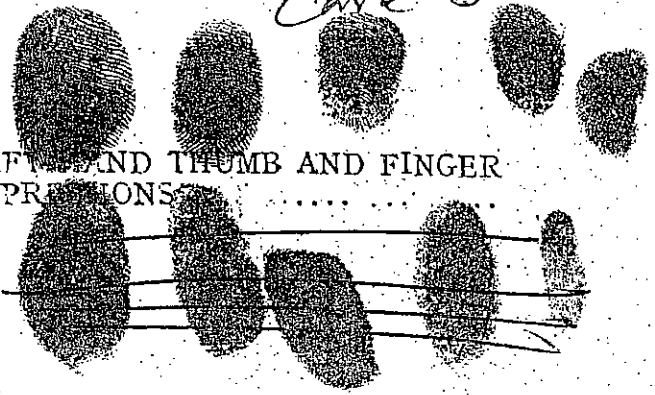
I do hereby certify that I have examined Mr. Nazia Dazi candidate for employment in the office of the..... Educator and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except.....

I do not consider this as disqualification for employment in the office of the..... His age according to his own statement..... 21 years and by appearance about..... 21 years.

MC No. 16202-8299245-8

A beg Mole for Pait and dan Care

LEFT HAND THUMB AND FINGER IMPRESSIONS



Medical Superintendent Civil Hospital

33532

Serial No: _____

Amendment

Roll No: 7651

6

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

PESHAWAR

DETAILED MARKS CERTIFICATE



Secondary School Certificate Examination: S-241

Name: Nazia Gazi Father's Name: Gazi Faizul Haq

Institution/District: _____ Date of Birth: _____

SUBJECTS	Marks Obtained						Remarks
	Max:	P/M	Theory	Practical	Total	P/F	
English	150	49			72		<i>Attested</i> Controller of Examinations Board of Intermediate and Secondary Education, Peshawar.
Urdu	150	49			87		
Islamiyat (Comp)	75	25			51		
Pak. Studies	75	25			36		
Riazi (New)	100	33			34		
General Science	100	33			51		
<i>CS</i>	100	33			70		
<i>PC</i>	100	33			41		
Total	850				462	-C	

Total (in words): Four forty two

Prepared by: S

Checked by: _____

Dated: 15 NOV 2001

Controller of Examinations
 Board of Intermediate and Secondary Education, Peshawar.

Notes: Errors/Omissions excepted

Annexure D

7

No. 2933

2651



Peshawar N.W.F.P. Pakistan
PROVISIONAL CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION

Session 2001-2002 Supplementary

I, SIS TO CERTIFY THAT **NAZIA QAZI**

Daughter of **QAZI FAIZUL HAQ**

and a candidate of **SWABI DISTRICT**

has passed the **Secondary School Certificate Examination** of the

Board of Intermediate and Secondary Education, Peshawar held in **September 2001**

as a **Private** candidate. She obtained **442** marks out of **850** and has been

placed in **Grade C** **Good**

The candidate passed in the following subjects:

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Mathematics
- 5. Physics
- 6. Chemistry

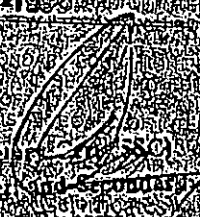
Date of birth according to government form: **04 January 1975**

Report by **Computer Cell**

Checked by **Asstt. Secretary**

Director of Examinations **2001**

Board of Intermediate and Secondary Education, Peshawar



LAST PAY CERTIFICATE

P.No.398866

Last pay certificate of **NAZLA QAZI**, Primary School Teacher, Government Girls Primary School, **GOSHALI**, Tehsil & District, Kohistan, proceeding on Transfer to District ~~Kohistan~~ **Swabi**

She has been paid up-to & for 28.02.2022 as per following rates:-

B-Pay	18120/-
HRA	2940/-
CA	2856/-
MA	1500/-
UAA	1500/-
Special Allo	800/-
AR 2013	327/-
AR 2015	226/-
AR 2016	1620/-
AR 2017	1812/-
AR 2018	1812/-
AR 2019	1812/-
AR 2021	1812/-
Teaching Allo	2664/-

Total: Rs.39801/- P.M

Deductions:

G.P.F. Accumulation No.IV/ EDU/	Rs.nil/-
G.P.F. Advance	Rs.nil
Contributory Provident Fund	Rs.nil
Income Tax	Rs.nil
Additional Group Insurance	Rs.nil
Group Insurance	Rs.nil
Benevolent Fund	Rs.nil
Employees Education Fund, KFK	Rs.nil

Total: Rs.0/- p.m.
Net Payable. Rs.39801/- P.M.

LPC No. 333 dt. 20/02/2022
[Handwritten signature]

LPC No. 333 dt. 20/02/2022
Counter signed
[Handwritten signature]
District Account Officer
Kohistan
2/2/22

i. She left over charge as Primary School Teacher of G.G.P.S, Goshali, Tehsil & District, Kohistan **by Transfer** on the after noon of **07.02.2022** while She has been paid up-to **28.02.2022**.

ii. Recoveries are to be made from the pay of the Government Servants as detailed on the reverse.

iii. She has been paid leave salary as detailed below.

Deductions have been made as noted on the reverse.

From _____ to _____ at Rs. _____
From _____ to _____ at Rs. _____
From _____ to _____ at Rs. _____

She is entitled to draw the following:-
She is also entitled to joining time for usually admissible days.
The details to the income Tax recovered from his up-to the date from the beginning of the current year are noted on reverse.

SDEO (Female)
Kohistan

[Handwritten signature]
District Education Officer
(Female) Kohistan

Sub Divisional Education Officer
(Female) Dasso Kohistan Upper

[Handwritten signature]
District Edt. Officer
(Female) Swabi

[Handwritten signature]
ASDEO
(Female) Dasso Kohistan Upper

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER

Consequent upon approval by the Competent Authority Mst. Nazia Qazi, PST, BPS-12, GGPS Goshali Kohistan Upper is hereby transferred/ adjusted against the vacant post of PST BPS-12 at GGPS, Rokhani District Swabi on her own pay & BPS in the interest of public service with immediate effect.

Note:-

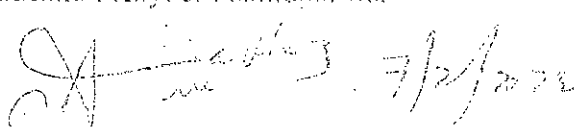
- 1 Charge report should be submitted to all concerned.
- 2 No TA/DA etc. are allowed
- 3 The DEOs concerned is directed to check /verify her original service documents before handing over charge to her under intimation to this office.
- 4 Her seniority will be determined at the bottom of the seniority list of PST (11-12) as per rules

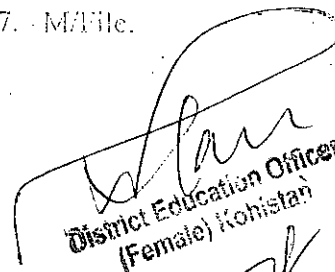
Director
Elementary & Secondary
Education Khyber Pakhtunkhwa

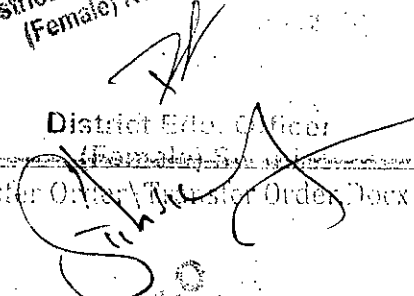
Endst:No. ²⁷⁸²⁻⁸⁵ /P.No.574/Vol-III/F/G, Transfer Dated Peshawar the 57 / 07 / 2022

Copy for information to the:-

1. District Education Officers (Female) Kohistan Upper.
2. District Education Officers (Female) Swabi.
3. District Account Officers Kohistan Upper
4. Head teacher concerned
5. Teacher concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
7. M/File.


Assistant Director (Female)
Elementary & Secondary
Education Khyber Pakhtunkhwa


District Education Officer
(Female) Kohistan


District E/Co. Officer
(Female) Kohistan

D:\MUNAWAR\Transfer Order\Transfer Order.docx

Page 195

Attested
SDEO (Female)
Kohistan


SDEO
(F) Kohistan

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)

KOHISTAN

No. 5355 Dated 10-2-2022


To:

The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject: - VERIFICATION OF POSTING TRANSFER ORDER

Memo:

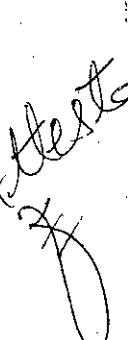
Copy of transfer order in respect of Nazia Qazi PST GGPS Goshali Kohistan Upper is hereby transferred Adjusted against the vacant post of PST at GGPS Rokhani District Swabi on her own pay & BPS vide Enstt: No 2782-2022 No.574 Vol-III/F-G.Transfer Dated Peshawar The 7-2-2022 in best interest of public service with immediate effect is submitted for verification/ confirmation and return to this office please

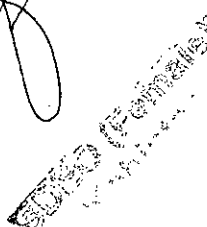

District Education Officer
(Female) Kohistan
10/2/2022

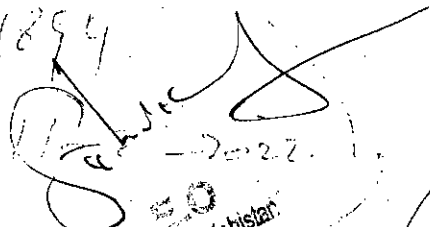
E/No: Estt/ Prr/ _____ DEO (F) Dated ____ / ____ /2022

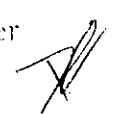
Copy of the above is forwarded to:

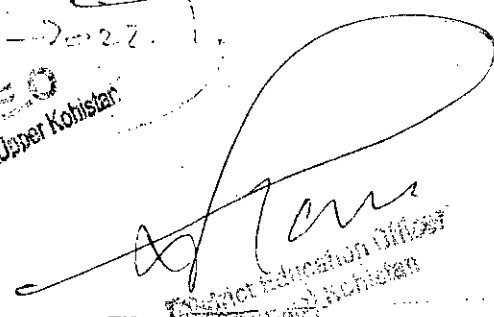
1. Deputy District Education Officer (Female) Kohistan Upper.
2. Sub-Divisional Education Officer (Female) Dasso Kohistan Upper
3. PA to DEO(F) Local Office

Attested




1894

-2022
DEO
(F) Circle Dasso Upper Kohistan


District Edu. Officer
(Female) Swabi
District Education Officer
(Female) Kohistan


District Education Officer
(Female) Kohistan



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

No. 4344 / F.No.574/vol-III//F/G.Transfer

Dated Peshawar the 11 / 02 /2022

To

The District Education Officer
(Female) Kohistan Upper

Subject:- VERIFICATION OF TRANSFER ORDER

Memo:

I am directed to refer to your letter No. 5355 dated 10.2.2022 on the subject noted above and to inform you that the transfer order issued vide this office Endst:No.2782-85/F.No.574/Vol-III/F/G.Transfer dated 7.2.2022 in respect of Mst. Nazia Qazi, PST, GGPS, Gosliali Kohistan Upper to GGPS, Rokhani District Swabi has been verified/checked and found correct.

Assistant Director (Female)
(E&SE) Khyber Pakhtunkhwa,

A.S.P.E.O.
(F) Circle, District Upper Kohistan

DEO
15/02/2022

Attested

District Education Officer
(Female) Swabi

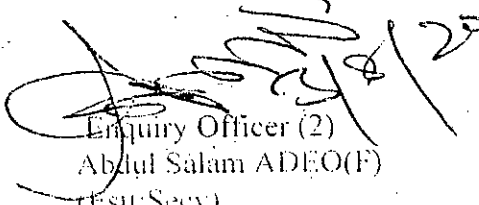
District Education Officer
(Female) Kohistan

The DEO (F) Kohistan issued a group office order of removal from service of seven teachers on 22-10-2015 among MST: Nazia Qazi PST GGPS Bar Komila placed at sr no 2 on the bases of inquiry report submitted on 24-08-2015 with the reference of the Director E&SE. The date of inter district transfer cancelation order and the removal from service order stands at the same date. It is clear that the said teacher was under the competency of the DEO (F) Swabi during the enquiry conducted on 24/08/2015 and the action of the DEO (F) Kohistan can be considered the err on his end.

RECOMMENDATIONS:

1. The teacher may be re stored permanently on her designated post in the light of the honorable court decision as it is.
2. The teacher posses the right of back benefits from the issue of court decision i.e. from 04-09-2019 and up to the re instatement order issued on 16-07-2020 by the DEO (F) Kohistan and onward for her duty performance.
3. The Honorable court has set-aside the removal from service order of DEO(F) Kohistan which reveals that the office has put obstacles in the path of the performance of the teacher due to the same dates of the cancellation inter District transfer order by the Director E&SE and the removal from service order of the teacher, which makes the teacher, rightful for back benefits from the date of her termination of intervention period but the teacher has enlarged the trail period in the court. Therefore the DEO will be justified if the back benefits of the interventional period of 16 months given to the teacher comparing the average time of the court for such decision.


Enquiry Officer (1)
Mst:Fozia SDEO (F) Dassu


Enquiry Officer (2)
Abdul Salam ADEO(F)
(Estt:Secy)

DE-NOVO ENQUIRY IN RESPECT OF MST: NAZIA QAZI PST

in the reference of the office order no 7117-18 dated 20-07-2020 consequent upon the decision/ directions of the honorable service tribunal Khyber Pakhtunkhwa at Peshawar regarding de-novo enquiry in respect of Mst. Nazia Qazi PST as under.

PROCEDURE /METHODOLOGY

- To go-through the service record
- To match the transfer/cancellation of transfer orders and office orders of both the DEOs Swabi & Kohistan
- Performance/school record

BACK GROUND:

The teacher initially appointed on 07-12-2006 vide District Education Officer (M&F) Kohistan No, 8836-42 at GGPS Kai Seo mentioning the teacher as resident of Kohistani while corrigendum office order regarding residency has been issued on 04-12-2010 bearing Endstt: No 8795-98 by the same office. During the service the teacher transferred to GGPS Gayal and than GGPS Bar Komila.

The teacher was transferred to District Swabi by the Director E&SE Vide 4980-85 dated 20-09-2011 and adjusted at GGPS Razi Bahader kotty Swabi. And the inter district transfer order was withdrawn on 22-10-2015 vide Director E&SE 3887-24.

The teacher was removed from service vide DEO (F) Kohistan No7105-10 dated 22-10-2015 in the light of recommendation of the inquiry report submitted on 24-08-2015.

The teacher filed the appeal before the honorable service tribunal of KPK at Peshawar appeal no 372/2016 and the court set-aside the impugned order No No7105-10 dated 22-10-2015 on 04-09-2019 with the direction of de-novo inquiry and the teacher reinstated by the DEO(F) Kohistan on 16/7/2020 bearing Endstt:No 7109-16.

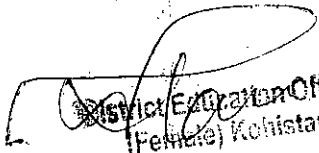
FINDINGS:


The teacher was initially appointed on 07-12-2006 by the DEO (M&F) Kohistan representing as local but the corrigendum order was issued by the same office on 04-12-2010 that shows an awkward official approach of the DEO (M&F) Kohistan.

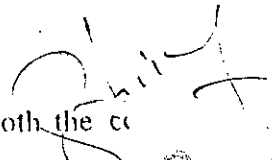
The performance record of the teacher of her school period in District Kohistan was thoroughly checked while the signed marked attendance register reflects her duty that she performed at different stations of the above mentioned schools. Copy of attendance register produced during the inquiry.

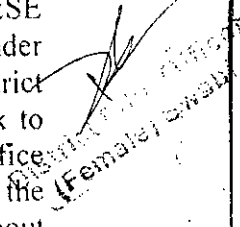
The teacher was transferred to the District Swabi on 20-09-2011 by the Director E&SE bearing Endstt; No 4980-85 on 20-09-2011 and she was adjusted at GGPS Razi Bahader kotty swabi where she performed services till the cancelation/withdrawal of the inter district transferred order no 4980-85 on 22-10-2015. The teacher made efforts to report back to DEO(F) Kohistan. Whereas the DEO (F) Kohistan issued the removal from services office order of the said teacher on 22-10-2015 bearing Endstt; No 7105-10 in the light of the recommendation of inquiry report submitted on 24-08-2015 with one strike of pen without any charge sheet or a show cause notice.

The salary of the teacher was not stopped in District Kohistan as well as District Swabi the removal from services (22-10-2015). Which shows the satisfaction of the DEO Offices.


District Education Officer
(Female) Kohistan


SDEO (Female)
Kohistan


District Education Officer
(Female) Kohistan

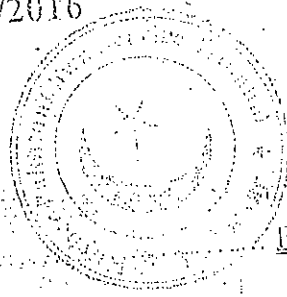

District Education Officer
(Female) Swabi

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 35 /2020

IN

Service Appeal No. 372 /2016



Mrs. Nazia Qazi D/o Muhammad Akbar,
village Yaqubi Tehsil Lahore Swabi,
PST Teacher GPS Razi Bahadar
Kotay Yaqubi Swabi.....

Petitioner

Versus

1. The Govt. of Khyber Pakhtunkhwa
through Secretary
Elementary & Secondary Education Department,
Civil Secretariat, Peshawar

2. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

District Education Officer (Female)
District Kohistan.

District Education Officer (Female)
District Swabi.

District Account Officer,
District Swabi

District Account Officer,
District Kohistan.....

Respondents

Execution Petition for directing the Respondents to implement the Judgment
of this Hon'ble Tribunal dated 27.08.2019, passed in Service Appeal
No.372/2016.

[Signature]
SDEO (Female)
Kohistan

Respectfully Sheweth,

That petitioner had filed Service Appeal No.372/2016 which was allowed
by the Hon'ble Tribunal vide Judgment dated 27.08.2019 (Annex-A) in the
following terms:

Certified to be true copy

[Signature]

[Signature]
District Education Officer
(Female) Kohistan

[Signature]
District Edu. O
(Female) Swabi

service against the post of PST (B-12) at GGPS Goshali District Kohistan, subject to the result of findings of de-novo inquiry here it is to be observed with concern that the judgment passed by this Tribunal has been implemented belatedly but one may also observe that due to spread of pandemic COVID-19 there was complete lock down for a substantial period of three months which could not be ignored and that period has to be excluded when no official work was performed. As regard the posting and transfer in the home district this is the internal matter of the department which can post a civil servant to one place or another or one district or the other though the order passed in this regard should not be arbitrary or based on discrimination. Posting and transfer of a civil servant is included in his terms and conditions of service and no one is exempted from the same therefore, in case of acting upon the judgment of this Tribunal passed on 27.08.2019 no other issue remain to be pondered and consequently the petition is filed without further proceedings.

SD/-

(MUHAMMAD JAMIL KHAN)
MEMBER

ANNOUNCED
22.07.2020

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

07.2020

Mr. Muhammad Amin Ayub, Advocate for the appellants is present. Mr. Kabirullah Khattak, Additional AG along with representatives of the department Rehana Yasmeen, District Education Officer (Female) Upper Kohistan and Mr. Muhammad Saddique, Litigation Officer are also present.

2. Learned counsel for the petitioner submitted that the judgment of this august Tribunal dated 27.08.2019 has not been implemented in its letter and spirit and undue delay in its implementation has been made to her prejudice violating her rights as the order was passed by the District Education Officer (Female) Kohistan with inordinate delay. That her colleagues having a similar grievance has been adjusted much earlier and posted in their home districts but discriminations have been meted out to petitioner she is seeking the indulgence of this Hon'ble Tribunal.

3. On the other hand, learned Additional AG submitted that the judgment referred to above passed by the Khyber Pakhtunkhwa Services Tribunal, has been implemented by virtue of reinstatement order made by the District Education Officer (Female) Kohistan on 16.07.2020 vide Endorsement bearing No. 7109-16/DEO. (F) KH/liti; therefore, nothing remains to be executed before this S.B. As regard making of reference to the appeal of other Government officials, the Hon'ble Tribunal in its judgment has stipulated a definite time span within which the de-novo inquiry has to be completed whereas in the referred to judgment for implementation in the instant execution petition no period for conclusion of de-novo inquiry has been given therefore, the stance taken by the petitioner is not tenable.

4. It is on record that by virtue of the judgment of this Tribunal dated 27.08.2019, on acceptance of appeal of petitioner, the impugned order dated 22.10.2015 was set-aside and respondents were directed to conduct de-novo inquiry strictly in accordance with law and rules. In compliance thereof the respondents by virtue of endorsement bearing No. 7109-16/DEO (F) KH/liti made by the District Education Officer (Female) Kohistan, the judgment of this august Service Tribunal has been given effect and accordingly the petitioner has been reinstated into government.

[Signature]
A.S. Dasgupta
District Education Officer (Female) Kohistan

[Signature]
SDEO (Female)
Kohistan

Filed to be true copy
[Signature]
Assistant



[Signature]
District Education Officer (Female) Kohistan

جارج رپورٹ

۴ نومبر ۲۰۲۲ء کو جاری کی گئی اور تاریخ ۰۷-۲-۲۰۲۲

BPS-12 Endst no 2782-85

کوئٹہ گورنمنٹ کالج کراچی

ایڈیشن تاریخ ۰۷-۲-۲۰۲۲ء کو جاری کیا گیا

از دیویر ایف ایف جی کالج کراچی

جارج ڈسٹریکٹ کالج جارج ڈسٹریکٹ کالج

Principal
G.C.P.S. Qambar
Razzar Dist: Swabi

HEAD MISTRESS
G.C.P.S. Qambar
Razzar Dist: Swabi

Date: 2/2/2022

DEO (Female)
Kohistan

District Edu. Officer
(Female) Swabi

District Education Officer
(Female) Kohistan

Before The Hon'able Service Tribunal of KPK at Peshawar

1

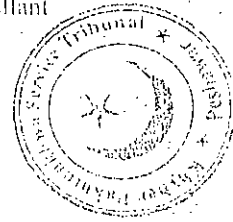
Appeal No. 379 /2016

A.W.P. Peshawar
Service Tribunal
Salary No. 341
Date: 06-11-2016

Mst. Nazia Qazi daughter of Muhammad Akbar resident of village
Yaqubi Tehsil Lahore District Swabi, Ex: PST Teacher GPS Razi
Bahadar Kotay Yaquobi SwabiAppellant

VERSUS

1. Director (E & SE) KPK Peshawar.
2. D.E.O (Female) Kohistan
3. D.E.O (Female) Swabi
4. District Account Officer Swabi
5. District Account Officer Kohistan.
6. Secretary of Education KPK Peshawar Respondent



A.S.D.
District Swabi

Appeal U/S-4 of the Service Tribunal Act 1974, against order of respondent No.1 dated 22/10/2015 & order of respondent No.2 dated 22/10/2015, whereby appellant is removed from service without any reason, which is illegal, against law & facts.

SDEO (Female)
Kohistan

Respectfully Sheweth;

Appellant humbly submits as under

1. That appellant is lady by her very personal status and is parda nasheen lady and employee of respondent department.
2. That respondents have advertized the post of PST for which appellant has properly applied and after completion of all codal formalities, appellant was appointed as a PST Teacher in District Kohistan vide order dated 07/12/2008.

(Copy of appointing order is attached as Annex "A").

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

[Signature]
District Officer
(Female) Kohistan

District E&S Officer
(Female) Swabi

6/9/16

[Signature]

[Signature]

[Signature]

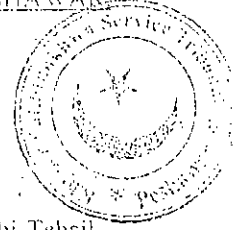
[Signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 372/2016

Date of Institution ... 06.04.2016

Date of Decision ... 27.08.2019



Mst. Nazia Qazi daughter of Muhammad Akbar resident of Village Yaqubi Tehsil
Lahore District Swabi, Ex-PST Teacher GPS Razi Bahadar Kotay Yaqoobi Swabi.
(Appellant)

VERSUS

The Director (E&SE), Khyber Pakhtunkhwa, Peshawar and five others.
(Respondents)

Present:

MR. YAQOOB KHAN,
Advocate --- For appellant.

MR. KABRULLAH KHATTAK,
Additional Advocate General --- For respondents.

MR. AHMAD HASSAN, --- MEMBER (Executive)
MR. MUHAMMAD HAMID MUGHAL --- MEMBER (Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the
parties heard and record perused.

ARGUMENTS

02. Learned counsel for the appellant argued that after observance of all codal formalities, she was appointed as PST in District Kohistan vide order dated 07.12.2008. As she possessed the domicile of District Swabi, therefore, through order dated 20.09.2011, she was posted in District Swabi and started performing duty. After putting in nine years service, she was removed from service vide order dated 22.10.2015 issued by respondent no.3. Feeling aggrieved, she filed departmental appeal on 20.12.2015, which remained unanswered. Hence, the present service

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

SDEO (Kohistan)

District Edu. Officer
(Female) Swabi

[Handwritten signature]

appeal. Impugned order was not served on the appellant and subsequently, obtained through personal efforts. It was issued without fulfillment of requirement laid down in the relevant rules thus was arbitrary, illegal and unlawful. The appellant was denied the opportunity of defense. Reliance was placed judgment of this Tribunal dated 22.03.2019 passed in service appeal no. 716/2016, whereby a case of similar nature was referred to the respondents to conduct de-novo enquiry.

03. Learned Adjt. Advocate General that she was illegally appointed and when the matter came to the notice of respondents the then DEO, Kohistan was directed to conduct enquiry. Enquiry report confirmed that her appointment was not in the prescribed manner laid down in the rules thus the same was illegal. On the basis of the said enquiry major penalty of removal from service was imposed on the appellant and other teachers. All codal formalities were observed before passing the impugned order.

CONCLUSION

04. The stance of the appellant about her regular appointment vide order dated 07.12.2008 and subsequent transfer to District Swabi through order dated 20.09.2014 was vehemently opposed by the respondents. They leveled allegations of serious irregularities in the appointment process which was confirmed on the basis of enquiry conducted by the then DEO, Kohistan. Enquiry report revealed that her appointment was illegal and made in utter disregard to the laid down criteria. As a sequel to enquiry report major penalty of removal from service was awarded to the appellant vide order dated 22.10.2015 issued by respondent no.3.

DEO (Female)
Kohistan

ATTESTED

District Education Officer EXAMINER
(Female) Kohistan
Hyder Pakhtunkhwa
Services Tribunal,
Peshawar

District Education Officer
(Female) Swabi

05. We will not dispute that the respondents had every right to probe into the irregularities that surfaced during the appointment of the appellant. However, they made a serious mistake by conducting fact finding enquiry that has no legal sanctity and any penalty awarded on the basis of such enquiry is not sustainable in the eyes of law. In order to award punishment to a civil servant he was required to be proceeded under E&D Rules 2011. Needless to point out that in the enquiry in question, the appellant was not associated with the proceedings thus condemned unheard. The only saner course left with the respondents is to conduct enquiry in accordance with the spirit of E&D Rules 2011 and thereafter may pass any order as deemed appropriate. The principle of consistency also demands that the case of the appellant be dealt with as per judgment of this Tribunal dated 22.01.2019 and 22.03.2019, as similar question of facts and law are involved.

06. As a sequel to the above, the instant appeal is accepted, impugned order dated 22.10.2015 is set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with law and rules. Parties are left to bear their own costs. File be consigned to the record room.

[Handwritten signature]

A.S.D.F.C.I
 District Education Officer Swabi

[Handwritten signature]
SDEO (Female)
 Kohistan

[Handwritten signature]
 (MUHAMMAD HAMED MUGHAL)
 MEMBER

[Handwritten signature]
 (AHMAD HASSAN)
 MEMBER

District Edu. Officer
 (Female) Swabi

ANNOUNCED
 27.08.2019

Date of Presentation of Application: 04-09-19
 Number of Pages: 1600
 Copying Fee: 20-00
 Urgent: 4-00
 Total: 24-00
 Name of Clerk: [Signature]
 Date of Receipt: 04-09-19
 Date of Delivery of: 04-09-19

[Handwritten signature]
 Certified to be true copy
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar

05. We will not dispute that the respondents had every right to probe into the irregularities that surfaced during the appointment of the appellant. However, they made a serious mistake by conducting fact finding enquiry that has no legal sanctity and any penalty awarded on the basis of such enquiry is not sustainable in the eyes of law. In order to award punishment to a civil servant he was required to be proceeded under E&D Rules 2011. Needless to point out that in the enquiry in question, the appellant was not associated with the proceedings thus condemned unheard. The only sane course left with the respondents is to conduct enquiry in accordance with the spirit of E&D Rules 2011 and thereafter may pass any order as deemed appropriate. The principle of consistency also demands that the case of the appellant be dealt with as per judgment of this Tribunal dated 22.01.2019 and 22.07.2019, as similar question of facts and law are involved.

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[Handwritten signature]

A.S.D.F.C.
 District Education Officer, Swabi

[Handwritten signature]
SDEO (Female)
 Kohistan

[Handwritten signature]
 (MUHAMMAD HAMID MUGHAL)
 MEMBER

[Handwritten signature]
 (AHMAD HASSAN)
 MEMBER

District Edn. Officer
 (Female) Swabi

ANNOUNCED
 27.08.2019

Date of Presentation of Application: 04-09-19
 Number of Words: 1600
 Copying Fee: 20-00
 Urgent: 4-00
 Total: 24-00
 Name of Clerk: *[Signature]*
 Date of Completion: 04-09-19
 Date of Delivery of: 04-09-19

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 Certified to be true copy
 Kh. E. S. Khan
 Service Tribunal,
 Islamabad

(Female)

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 35 /2020

IN

Service Appeal No. 372 /2016

Mst. Nazim Qazi D/o Muhammad Akbar,
village Yaqubi Tehsil Lahore Swabi,
Ex: PST Teacher CPS Razi Bahadar
Kohat Yaqoobi Swabi.....

Petitioner

Versus

1. The Govt. of Khyber Pakhtunkhwa
through Secretary
Elementary & Secondary Education Department,
Civil Secretariat, Peshawar.
2. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female)
District Kohistan.
4. District Education Officer (Female)
District Swabi.
5. District Account Officer,
District Swabi.
6. District Account Officer,
District Kohistan.....

Respondents

Execution Petition for directing the Respondents to implement the Judgment
of this Hon'ble Tribunal dated 27.08.2019 passed in Service Appeal

No. 372/2016

SDEO (Female)
Kohistan

Respectfully Sheweth,

District Edn. Officer
(Female) Swabi

That petitioner had filed Service Appeal No. 372/2016 which was allowed
by the Hon'ble Tribunal vide Judgment dated 27.08.2019 (Annex-A) in the
following terms:

District Education Officer
(Female) Kohistan

Certified to be true copy
Kohistan

Office of the District Education Officer (F) Kohistan

REINSTATEMENT

Consequent upon the judgment dated 20/11/2016 of the Honorable Khyber Pakhtunkhwa Service Tribunal (KPS) Appeal No.372/2016, in case lit no Mst. Hozia Gami, the applicant is hereby re-instated into Government service to join the post of SDO (F) Goshali District Kohistan subject to the conditions mentioned below:-

1. TA/DA is allowed

2. Charge report should be submitted to all concerned.

District Education Officer (F) Kohistan

- 1. A copy of the above is forwarded to:-
- 2. The Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar
- 3. The Additional Advocate General Khyber Pakhtunkhwa Peshawar
- 4. The Section Officer (Lit. II) E&SE Department Peshawar
- 5. The Deputy Commissioner Kohistan
- 6. The Deputy District Education Officer (F)
- 7. The District Account Officer Kohistan
- 8. The Sub-Divisional Education Officer (F) Kohistan
- 9. The Officer in Charge

Handwritten signature and stamp of the District Education Officer (F) Kohistan.

District Education Officer (F) Kohistan

SDEO (Female) Kohistan

District Edu. Officer (Female) Swabi

District Education Officer (Female) Kohistan

OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) KOHISTAN

OFFICE ORDER

WHEREAS Mrs Nazia Qazi PST was appointed as PST teacher at GGPS Kai Sado on 17/08/2015 and was transferred to District Swabi by the Director E&SE vide 4989 dated 24/08/2015 and the said transfer order withdrawn on 23/10/2015 bearing Enclstt No. 7109/15.

WHEREAS Mrs Nazia Qazi PST was proceeded under the Khyber Pakhtunkhwa Government I servani (Efficiency & Discipline) rule 2011 on account of fact finding report submitted to the DEO (F) Kohistan on 24/08/2015 and the DEO (Female) Kohistan issued an intervention service office order on 23/10/2015 bearing Enclstt No. 7109/15. The said teacher was on the jurisdiction of DEO (F) Swabi.

WHEREAS the teacher filed the writ petition in the honorable service tribunal on 09/01/2016 and the said writ petition set aside the office order of removal from service bearing Enclstt No. 7109/15 dated 23/10/2015 with the direction of de-no-ta-creta.

WHEREAS the DEO (F) Kohistan issued an intervention office order of the teacher for the purpose of de-no-ta-creta on 10/07/2020 bearing Enclstt No. 7109/15 and the copies of the said office order were sent to the concerned offices.

WHEREAS the inquiry officers conducted the inquiry of the said teacher and submitted the report with the draft and recommendations of period of intervention and the back benefits were to be provided up to the expiry of the said sixteen months of intervention period.

IN CONSEQUENCE of the court decision and the recommendations of the inquiry officers, the said teacher reinstated permanently with the recommended back benefits to the date of the said office order and retained the office order no. 7109/15.

TERMS/CONDITIONS:

- 1. The teacher is allowed to work on a temporary basis until the permanent position is created.
- 2. The seniority of the intervention period will be considered with the previous service of the post.

[Handwritten Signature]
 District Education Officer
 (Female) Kohistan

(Behana Yasmeen)
 District Education Officer
 (Female) Kohistan

Enclstt No. 7307-14 (D.O. dated 10/11/2020)
 The above is forwarded to:
 1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

SDEO Kohistan

- 2. The Deputy Commissioner, District Kohistan
- 3. The District Monitoring Officer, Kohistan
- 4. The Registrar, service tribunal, Khyber Pakhtunkhwa, Peshawar
- 5. The Addl. Advocate, service tribunal, Khyber Pakhtunkhwa, Peshawar
- 6. The Sub-Divisional Education Officer, (F) Derasa
- 7. The Teacher concerned
- 8. The District Office

[Handwritten Signature]
 District Edu. Officer
 (Female) Swabi

[Handwritten Signature]
 District Education Officer
 (Female) Kohistan

[Handwritten Signature]
 District Education Officer
 (Female) Swabi

Report - 16/7/2022

چارج رپورٹ

میں نے جی ایچ ایڈو صاحبہ ضلع کوہستان - DEO کوہستان کو چارج سنبھالا ہے۔

1201ء سے 1202ء تک کی تفصیل میں آج سموریہ 1202ء سے 1203ء تک کی تفصیل اور دوپہر

کاپیاں

میں اپنی منصب نشہت کے تحت تمام کاموں کو سرکار کو پیش کرنا ہے۔
میں اپنے ذمہ داریوں کو سرکار کو پیش کرنا ہے۔
میں اپنے ذمہ داریوں کو سرکار کو پیش کرنا ہے۔

چارج کرنے والے کا نام

Head Mistress
GC Kohistan

Sub-District Education Officer
Female Dept
Kohistan

Signature
District Education Officer
Kohistan

Signature
District Edu. Officer
(Female Dept)

Signature
SDEO
Kohistan

Signature

Salary Statement (July-2021)



NAZIA QAZI d/w/s of QAZI FAZAL HAQ

CNIC: 1620282992458

NTN:

Entry into Govt. Service: 07.12.2006

Length of Service: 14 Years 07 Months 026 Days

Category: Active Temporary

Position: PRIMARY SCHOOL TEACHER

80002563-DISTRICT GOVERNMENT KHAYBE

Office Code: KP6016-DY.DG PRIMARY (FEMALE) KOHISTAN DASSU

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: No

GPF Balance:

414.00

Vendor Number:

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 12

Pay Stage: 4

Code	Wage type	Amount	Code	Wage type	Amount
0601	Basic Pay	17,160.00	1001	House Rent Allowance 45%	2,724.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1550	Special Allowance	800.00	1920	UAA-KOHISTAN 40%	1,500.00
2148	15% Adhoc Relief All-2013	327.00	2199	Adhoc Relief Allowance 10%	2,664.00
2211	Adhoc Relief All 2016 10%	1,632.00	2224	Adhoc Relief All 2017 10%	1,716.00
2247	Adhoc Relief All 2018 10%	1,716.00	2264	Adhoc Relief All 2019 10%	1,716.00
2409	Adhoc Relief All 2021 10%	1,716.00	2316	Teaching Allowance 2021	2,664.00

Contact: [illegible]

Wage type	Amount	Wage type	Amount
[illegible]	[illegible]	[illegible]	[illegible]

Contact: [illegible]

Loan	Description	Principal amount	Deduction	Balance
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Reductions - Income Tax

Payable: 0.00 Recovered till July-2021: 0.00 Exempted: 0.00 Recovered till: 0.00

Gross Pay (RS.): 38,457.00 Deductions: (RS.): 0.00 Net Pay: (RS.): 38,457.00

Payee Name: NAZIA QAZI

Account No: 8070563711001699

Bank Details: MCB BANK LIMITED, 241781 DASSU KOHISTAN KOMILA DASSU KOHISTAN KOMILA BRANCH KOHISTAN

Notes: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: SWAT

Domicile: -

Homeing Name: [illegible]

Temp. Address:

City:

Email:

[Handwritten Signature]
District Education Officer
Kohistan

[Handwritten Signature]
District Edu. Officer
(Female) Swabi

[Handwritten Signature]
District Education Officer
(Female) Swabi

457106/27.07.2021/4:14:54 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

(*Strike out which ever is not applicable)

3

FORM 15 (02/82) CASE DESIGN: PUNJAB SCHE. OF P. & C. CONTROLLED BY GRADE 12 (11) A. A. S. D. I. D. U. C. T. I. O. N. S. A. M. O. U. N. T. 1994-1995 PRINCIPAL H. U. A. I. D. 1995

Adm. Exp.	341,750.00	3012 GPF Subscription	2,020.00	600.00
House Rent Allowance	1,961.00	3503 Benevolent Fun		125.00
Convey Allowance 20	7,356.00	3990 Emp. Edu. Fund GPF		600.00
Medical Allow.	1,100.00	4004 A. Benefits & Death C		500.00
Special Allowance				
L.A. KHORISTAN COMPT. 1				1,500.00
Adm. Exp. Resst. All.				375.00
Adm. Exp. Resst. All.				1,000.00
Adm. Exp. Resst. All.				1,810.00
Adm. Exp. Resst. All.				1,010.00
Adm. Exp. Resst. All.				1,810.00

DEBITS 1720 35,591.00 CREDITS 3,545.00

MUSHTAQ CAMARSHEL BANK NCB FARM KHORISTAN AT DAW

Signature

Signature
SDEO (Female)
Kohistan

District P. & C. Officer
(Kohistan)

Total	850		442	7
-------	-----	--	-----	---

Total (in words): Four Four Two

Prepared by: S
Checked by: [Signature]

Confidential to
Board of P. & C.
District

15 NOV 2001

(*Strike out which ever is not applicable)

Roll No. 758



Board of Intermediate and Secondary Education
Peshawar N.W.F. Pakistan
Secondary School Certificate Examination
SESSION 2001-SUPPLEMENTARY
(Humanities Group)

[Signature]
 District Education Officer
 (Peshawar Division)

[Signature]
 District Edu. Officer
 (Peshawar Div.)

This is to Certify that Nazia Qazi Son / Daughter of Qazi Faizul Haq
 and a resident of Swabi District has passed the Secondary School Certificate
 Examination of the Board of Intermediate and Secondary Education, Peshawar held in September, 2001 as a Private
 candidate. He / She obtained 442 Marks out of 850 and has been placed in Grade C Representing Good

- The Candidate passed in the following subjects:
- | | |
|------------|---------------------|
| 1. English | 3. Islamiyat |
| 2. Urdu | 4. Pakistan Studies |

- | | |
|--------------------|--------------------|
| 5. Mathematics | 7. Islamic Studies |
| 6. General Science | 8. Pashto |

Date of birth according to admission form January 04, 1985

[Signature]
 Secretary

[Signature]
 Secretary

[Signature]
SDEO (Female)
Kohistan



3127
 Strike out / G. No.

Roll No. 76

BOARD OF INTERMEDIATE & SECONDARY EDUCATION PESHAWAR



PESHAWAR

DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination 8/20

Name: Nazia Gazi Father's Name: Muhammad
 Institution: _____ Date of Birth: _____

SUBJECTS	Marks Obtained					
	Writ.	Prq.	Theory	Practical	Total	Per
English	150	49			72	
Urdu	150	49			87	
Islamiyat (Comp)	75	25			51	
Pak. Studies	75	25			36	
Riazi (New)	100	33			34	
General Science	100	33			51	
	100	33			70	
	100	33			61	
Total	850				462	54

Total (in words): Four Forty Two

Prepared by: _____

Checked by: _____

Dated: 15 NOV 2001

District Edu. Officer
(Female) Swabi

(Note: Errors/Omissions excepted)

SDEO (Female)

Board of Intermediate & Secondary Education, Peshawar

3022 /G. Dated 16-1
 (*Strike out which ever is not applicable)



Board of Intermediate and Secondary Education
Mardan P.O. F.P. Pakistan
INTERMEDIATE EXAMINATION

SESSION 2006 - ANNUAL

Director of Education
Mardan

This is to certify that NAZIA QAZI Daughter of QAZI FAZUL HAQ
and resident of District Swabi Registration No. 599-BIMP-02 has passed the Intermediate
Examination of the Board of Intermediate & Secondary Education, Mardan held in May/June, 2006
as a Private Candidate. She obtained 471 Marks out of 1100 and has been placed in
Grade D representing Fair

Rashid
Asst. Secretary

[Handwritten Signature]

[Handwritten Signature]
SDEO (Female)
Kohistan

[Handwritten Signature]
DISTRICT EDUCATION OFFICER
Mardan

14-6-2006
Dated /6. Dated
(*Strike out which ever is not applicable)



ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
Directorate of Students Advisory & Counselling

No. 157639

Migration / No Objection Certificate

It is certified that Mr./Ms. NAZIA QAZI

Son/Daughter of QAZI FAZUL IQBAL

has passed B.A programme from this University

year 2017 under registration No. 12-NST-0112017

This University has no objection to continue his/her studies in

Date of declaration of result 14-02-2017

Date of issue 16-01-2020

District Education Officer
(Female) Kohistan

1175 /G. Dated 16-1-2020
(*Strike out which ever is not applicable)

13A-DMC

112

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD PROVISIONAL RESULT CARD

Serial No. 568437

Roll No.
Registration No.
Final Semester

AMADPPT
14010000

Name: NAZIA QAZI
Father's Name: QAZI FAZUL HAQ
Address: MOH YOUSIF KHIL YAR HUSSAIN

City: SWABI
District: SWABI

has successfully completed BACHELOR OF ARTS
GROUP-GENERAL
The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	Maximum
SPK- 12	0419	EDUCATION	100	100
ART- 12	0416	ISLAMIAT (C)	100	100
ASP- 12	0436	SERRAT-E-TAYYARA	100	100
AUT- 12	1422	COMPULSORY ENGLISH-I	100	100
AUT- 13	0437	ISLAMIAT (E)	100	100
SPK- 14	0407	MODERN MUSLIM WORLD	100	100
SR- 14	0411	SOCIOLOGY-I	100	100
SP- 14	1424	COMPULSORY ENGLISH-II	100	100
ART- 14	0452	RADIO BROADCASTING	100	100
SP- 16	0417	PAKISTAN STUDIES (2)	100	100
SP- 16	0488	FOOD & NUTRITION	100	100

SDEO (Female)
Kohistan

District Edu. Officer
(Female) Swabi

Total Credits: 8
Result Declared on: FEBRUARY 10, 2017
Date of Issue: FEBRUARY 20, 2017

Total Marks/Obtain
Percentage/Grade

1307- /G. Dated 14-1-2017
(*Strike out which ever is not applicable)

is presented, as a notice only. Any error...

DOMICILE CERTIFICATE

NAZIA QAZI

== See Daughter of FAIZUL HAQ

hereby declare that I was born of parents who are permanently domiciled in North-West Frontier Province having been born/settled in this Province.

I was born at Village/Mohallah DAGAI QAZI ABAD BANDA
Tehsil SWABI District Swabi.

Signature of the declarant

Date 13.6.2001

Pursuance to the declaration dated: 13.6.2001 filled by

Mr/Miss NAZIA QAZI See Daughter of FAIZUL HAQ

domiciled in North West Frontier Province, it is hereby certified, that the said NAZIA QAZI is born of parents who are permanent residents of the North-West Frontier Province having been born/settled* within it.

I have satisfied my self from personal knowledge/verification* that the above declaration is true and certify accordingly.

This 13th Day of June 2001

Name: Nazim Aul
Designation:- MAGISTRATE 1st Class
Top/Lahor/Kalu Khan
(Seal)

COUNTERSIGNED

SDEO (Female)
Kohistan

DISTRICT MAGISTRATE
SWABI
(Seal)

District Education Officer
(Female) Kohistan

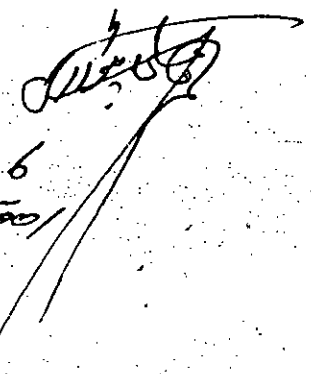
District Education Officer
(Female) Swabi

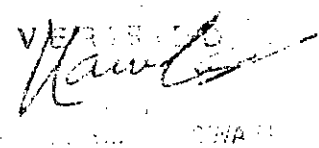
No. 7307

Dated 14.6.2001

(*Strike out which ever is not applicable)

خراب حال!
 لکھنؤ کی حالت ہے۔ برصغیر ہندوستان کی دور میں لکھنؤ
 کو فتح کرنے کے بعد لکھنؤ کی حالت آج بھی گھبراہٹ میں ہے۔
 کہ جس کی حالت دیکھ کر ہر شخص کو ہراساں کرنے کا
 ارادہ ہو رہا ہے۔

14/6/2001


VERIFIED


No. _____
 73027 /G. Dated _____
 *Strike out which ever is not app.
 DISTRICT MAGISTRATE
 SWABI (Seal)
 COUN.

pte pte
Allama Iqbal Open University
Islamabad



Certified that Mr./Ms. NAZIA QAZI
Son/Daughter of QAZI FAIZ UL HAQ
Registration No. 09NSI01302 Roll No. AC630337
Semester AUTUMN 2009 having met all the requirements

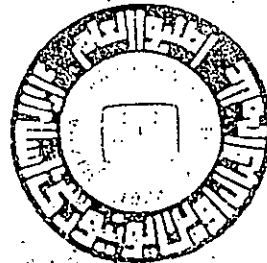
under the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured 82 marks
and has been placed in 3 rank.

SDEO (Female)
Kohistan

District Educ. Officer
(Female) Swabi



District Educ. Officer
(Female)

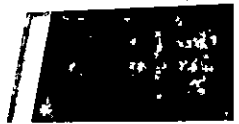
District Educ. Officer
(Female)

Valid till September 17, 2010
February 07, 2020

CONTROLLER OF EXAMINATIONS

Not valid for certificate in degree without attention to detail
The detail of courses is enclosed

No. 7302
(*Strike off) /G n.



NAME OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND
SECONDARY EDUCATION KHYBER PAKHTUNKHWA

CORRESPONDENCE

In continuation of the above mentioned letter, please find the copy of the letter for the information of the District Officer, District Swat.

Respected District Officer
District Swat



Yours faithfully,
District Officer Swat

Copy of the above is forwarded to the District Officer, District Swat.

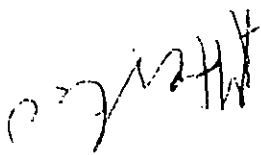
District Officer (Female) Kohistan

District Officer (Female) Kohistan

District Officer (Female) Kohistan



Respected District Officer
District Swat

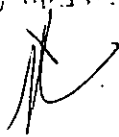


Respected District Officer
District Swat

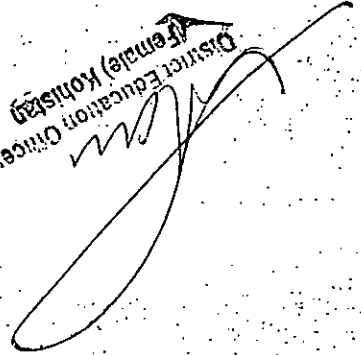
SDEO (Female)
Kohistan



District Officer (Female)
District Swat



District Education Officer
(Female) Kohistan



District Education Officer (Female) Kohistan
District Swat

Serial No: 30192

Roll No: 7651

BOARD OF INTERMEDIATE & SECONDARY EDUCATION PESHAWAR



DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination: S 241

Name: Nazia Gazi Father's Name: Gazi Faiz ul Haq
Institution/District: _____ Date of Birth: _____

SUBJECTS	Marks Obtained						Remarks
	Max:	P/M	Theory	Practical	Total	P/E	
English	150	49			72		<p>Attested</p> <p><i>[Signature]</i></p> <p>Controller of Examinations Board of Intermediate and Secondary Education, Peshawar</p>
Urdu	150	49			87		
Islamiyat (Comp)	75	25			51		
Pak. Studies	75	25			36		
Riazi (New)	100	33			34		
General Science	100	33			51		
<u>13</u>	100	33			70		
<u>Pr</u>	100	33			41		
Total	850				442	-C	

Total (in words): Four Forty Two

Prepared by: S

Checked by: _____

Dated: _____

15 NOV 2001
SDEO (Female)
Kohistan

District In. Officer
(Female) Swabi

Controller of Examinations
Board of Intermediate and Secondary
Education, Peshawar.

Note: Errors/Omissions excepted

District In. Officer
(Female) Kohistan

41584

S. No.

Roll No. 35521

Group. Humanities



Board of Intermediate and Secondary Education

Mardan N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

SESSION 2006 - ANNUAL

This is to certify that NAZIA QAZI Daughter of GAZI FAZUL HAQ
 and Student of District Swabi Registration No. 599-B/MP-02 has passed the Intermediate
 Examination of the Board of Intermediate & Secondary Education, Mardan held in May/June, 2006
 as a Private candidate. She Obtained 471 Marks out of 1100 and has been placed in
 Grade D Representing Fair

[Signature]
 BDEO (Female)
 Kohistan

[Signature]
 Asstt. Secretary

[Signature]
 Deputy Education Officer
 (Female) Mardan

[Signature]
 Secretary

This certificate is issued without alteration or erasure

District Office
 (Female) Swabi



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MARDAN N.W.F.P PAKISTAN

S. No. MB 011457

Roll No: 35521

Registration No: _____

PROVISIONAL AND DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION - 2006
HUMANITIES (Part-II)

NAZIA QAZI

Son/Daughter of QAZI FAZUL HAQ

of Institution/District SWABI

has secured the marks shown against each subject in the Higher Secondary School Examination held in the month of MAY/JUNE as PRIVATE Candidate.

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	34	--	38	--	72	Seventy-Two
Urdu	200	--	--	--	--	75	Seventy-Five
Pak-Studies / Islamic Education	100	--	--	--	--	37	Thirty-Seven
Civics	200	--	--	--	--	89	Eighty-Nine
Islamic Studies	200	--	--	--	--	85	Eighty-Five
Pashto	200	--	--	--	--	113	One Hundred Thirteen

Total : 1100

471-D Four Hundred Seventy-One Only.

Remarks :

Prepared by :

Checked by :

Result Date : 05 August, 2006

SDEO (Female)
Kohistan

Note: Error/Omission accepted. Any mistake in above particulars must be intimated within 30 days after declaration of result.

Controller of Examinations
BISE Mardan

District Education Officer
(Female) Kohistan

District Education Officer
(Female) Kohistan

District Education Officer
(Female) Dassu Kohistan Upper

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 215697

PROVISIONAL RESULT CARD

Name: NAZIA GAZI
 Father's Name: GAZI FAIZ UL HAQ
 Address: VILLAGE KADY, GAZIABAD P. O. GHS
 SIKANDARY C/O SHARA FAT SHAH
 Tehsil: SWABI
 District: SWABI

Roll No. AC839837
 Registration No. 09NSIG1302
 Final Semester: AUT- 2009

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 09	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	70
SPR- 09	0614	EDUCATIONAL PSYCHOLOGY	100	70
SPR- 09	0613	PRINCIPLES OF EDUCATION	100	70
SPR- 09	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	70
AUT- 09	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	54
AUT- 09	0618	TEACHING OF MATHEMATICS	100	75
AUT- 09	0617	TEACHING OF URDU	100	70
AUT- 09	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	70
AUT- 09	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	70

**SDEO (Female)
Kohistan**

(Signature)
District Education Officer
(Female) Kohistan

(Signature)
District Education Officer
(Female) Kohistan

CREDITS: 5

Total Marks Obtained: 500

Result Declared on: SEPTEMBER 17, 2010

Percentage Grade: 62

Date of issue: SEPTEMBER 19, 2010

Disclaimer:

This result card is issued provisionally, errors and omission excepted as a notice only. Any entry appearing in this card does not confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Controller of Examinations

**District Education Officer
(Female) Kohistan**

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD

Serial No. 568437

Roll No. AN423583

Name NAZIA QAZI

Registration No. 12NST00304

Final Semester SPR-2016

Father's Name QAZI FAZUL HAQ

Address MOH YOUNIS KHEL YAR HUSSAIN

Tehsil SWABI

District SWABI

has successfully completed BACHELOR OF ARTS
GROUP-GENERAL

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR-12	0419	EDUCATION	100	59
AUT-12	0416	ISLAMIAT (C)	100	56
AUT-12	0436	SERAT-E-TAYYABA	100	69
AUT-12	1423	COMPULSORY ENGLISH-I	100	62
AUT-13	0437	ISLAMIAT (E)	100	61
SPR-14	0407	MODERN MUSLIM WORLD	100	71
SPR-14	0411	SOCIOLOGY-I	100	55
SPR-14	1424	COMPULSORY ENGLISH-II	100	61
AUT-14	0453	RADIO BROADCASTING	100	52
SPR-16	0417	PAKISTAN STUDIES (C)	100	59
SPR-16	0484	FOOD & NUTRITION	100	67

[Signature]
SDEO (Female),
Kohistan

[Signature]
District Officer
(Female) Swabi

[Signature]

Total Credits 8
Total Marks/Obtained 1100 / 607
Result Declared on FEBRUARY 14, 2017
Percentage/Grade 61 / B
Date of Issue FEBRUARY 20, 2017

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules regulations of the University.

District Officer
(Female) Kohistan

84

ENQUIRY IN RESPECT OF MST. NAZIA QAZI PST GGPS GOSHALI

ENQUIRY COMMITTEE:

1. Mr Ghulam Sarwar I/C Principal GCMHS Dassu.
2. Mr. Khurshid Khan SST GHS Seo.

REFERENCES

With reference to the DEO (F) Kohistan office order No 735-39/LI/DEO (M) KH Dated 19/03/2021 enquiry in respect of Mst Naiz Qazi regarding tempering of the thumb print in the service book (Medical certificate enquiry report is as under.

PROCEDURE/ METHODOLOGY:

1. Questionnaire Method.
2. To go through the previous "De-Novo enquiry report", conducted on 03/08/2020.
3. To take thumb/finger print on a plain paper.
4. Personal hearing.

FINDINGS:-

According to the previous enquiry "De-Novo report" the teacher was initially appointed on 07/12/2006 by the DEO (F) Kohistan representing as local but the corrigendum order was issued by the same office on 04/12/2010 that shows an astonishing official approach of DEO (M/F) Kohistan. The performance record of the teacher of her school period in District Kohistan was thoroughly checked which was satisfactory.

The teacher provided written answers to the questionnaire comprising sixteen questions. In the light of court's decision, previous enquiry report, oral responses, written responses and feedback/interviews from various people, it is clear that the teacher is honest and dutiful.

We have taken her thumb/finger print on plain paper as a sample to match with the thumb/ finger print of the service book and medical certificate.

Her service book/ Medical certificate have finger prints twice but according to her written statement the SDEO (F) Dassu office applied them, but she does not know the purpose of it.

The former SDEO (F) Dassu Mst. Zakia Jabeen's (Period 2007 to 2009) attestation on her service book shows that the finger/ thumb print are her own and correct.

District Pdu.
(Female)

Principal
(Female)

DEO (F) Kohistan

SDEO (Female)
Kohistan

2021

District
(Female)

MEDICAL CERTIFICATE.

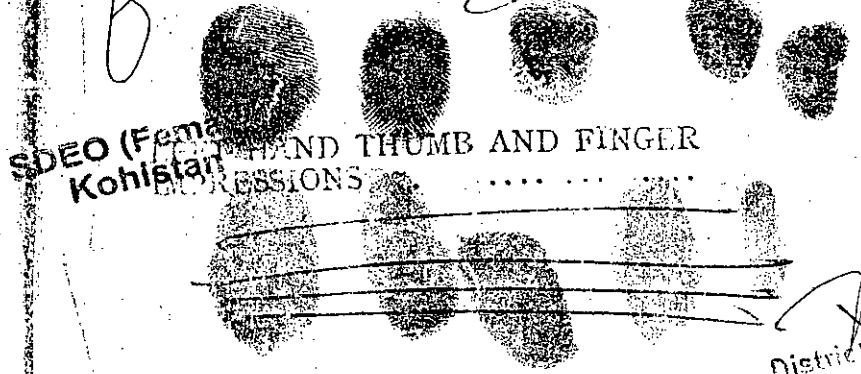
Name of Official, NAZIR QAZI
 Caste or race, Qazi
 Father's name, MR. FAZLUL-HAQ
 Residence, VILL. DAZGA, DIST. SANGHAR
 Date of birth, 4-1-1985
 Exact height by measurement, 5-11
 Personal mark of identification,
 Signature of the Official, [Signature]
 Signature of head of office, [Signature]

Seal of Office, [Signature]

I do hereby certify that I have examined Mr. Nazir Qazi candidate for employment in the office of the Educator and cannot discover that he had any disease communicable or other constitutional affliction or bodily infirmity except
 I do not consider this as disqualification for employment in the office of the
 His age according to his own statement Twenty one years and by appearance about (21) years.

NIC No - 16202-8299245-8

A big Mole on (R) Sait area
 CAVE



Medical Superintendent
 Civil Hospital

District Edu Officer
 (Female) Kohistan

[Signature]
 District Edu Officer
 (Female) Kohistan

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER
SCHOOLS AND LITERACY KHOSHTAN**

①

NOTIFICATION

Consequent upon the approval of departmental selection committee of Schools and Literacy Department Kohistan, the competent authority is pleased to appoint the following fresh (Female) candidates as PTC Untrained Trained Matric Pass in BPS-05 Rs. 2415-115-586.3) plus usual allowances as due and admissible under the Rules on contract basis in the Schools noted against their names according to the Merit Policy issued by the Schools & Literacy Department NWFP in the interest of public service with immediate effect.

S. No.	Name/ Father's Name	Residence	School where appointed	Remarks
1	Nazia Qazi D/O Qazi Fakh-al-Haq	Komila	GGPS Kai	Agst V. Post
2	Nazia Akbar D/O Muhammad Akbar	Jahnu	GGPS Bar Bah	do
3	Fajia Bahar-Zaman D/O Bahar	Gasuli	GGPS Bar Bah	do

CONDITIONS

1. No TA/ DA is allowed to any one
2. Charge report should be submitted to all concerned
3. Their appointments are purely on temporary basis and liable to termination at any time with out assigning any reason/ notice
4. Their certificates if not verified, should be verified by the DDO (F) i.e. Mr. Abdul Rehman I/C Dy: DDO (F) S&L Kohistan before handing over charge to them.
5. They will be governed by such rules & regulation enforced and as prescribed by the Government from time to time for the category of the Government servants to which they belong
6. In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
7. They should produce all the necessary documents from their old institutions.
8. They should not be allowed to take over charge of their respective posts after 18 years & above 30 years.

Executive District Officer
Schools & Literacy Kohistan

Encl: No. 8836-47 Dated Kohistan the 7/12/2000

Copy of the above is forwarded to the:-

1. PS to Secretary Schools & Literacy Department NWFP Peshawar
2. PA to Director Schools & Literacy NWFP Peshawar
3. District Nazim Kohistan
4. District Coordination Officer Kohistan
5. District Accounts Officer Kohistan
6. Deputy District Officer (F) S&L Kohistan
7. Candidates concerned

Executive District Officer
Schools & Literacy Kohistan

SDEO (Female)
Kohistan

District Education Officer
(Female) Kohistan

District Education Officer
(Female) Kohistan

Sub Divisional Education Officer
(Female) Dassew

SERVICE BOOK

NIC No-216202-8299245-8 ✓

Old Nic No-13985-924812

روز بک

Pen. No-00398866

کتاب ملازمت
NBP-Pattan A/C No 13516-7



NIC No-16202-8299245-8 ✓

Name	نام	Nazira Dazi
Father's Name	والد کا نام	
Qualification	قابلیت	
Designation	نہرہ	
Department	مکرم	
Permanent Address	مستقل پتہ	

Star

Suo Di...

noted on reverse, his up to the date

SERVICE BOOK

NIC No-16203-8299245-8 ✓

Old NIC No-13085-924812

روز بک

Per. No-00398866

کتاب ملازمت

NBP-Pattan A/c No 13516-7



NIC No-16203-8299245-84

Name	نام : Nazia Qazi
Father's Name	والد کا نام
Qualification	تالیفیت
Designation	ہجہ
Department	کے
Permanent Address	ستقل پتہ

Name _____

Date of birth _____

Home Distt. _____

DETAILS OF QUALIFICATION

قابلیت کی تفصیل

Examination	Roll No.	Year	Spring Autumn	Division	Grade	Subjects	Signature of Attesting Officer
امتحان	رول نمبر	سال	بہار خزاں	درجہ	گریڈ	مضامین	درستی افہر کے دستخط
Matric میٹرک	Passed SSC Examination from BISE Faisalabad under R. No 7651 held in 2007, Marks obtained 402/850						
Intermediate انٹرمیڈیٹ	Passed Intermediate Examination from BISE Faisalabad under R. No 35521 held in 2007, Marks obtained 471/1100 Result was declared.						
B.A. بی اے	Passed P.T.C examination from AIOU Islamabad under Roll No. AD 639837 during the session AUT: 2009 obtaining marks 556/800 R.D on 17-09-2010						BY DIST. OFFICER (FEMALE) KHANSAH
B.Ed بی ایڈ							
M.A. ایم اے							
M.Ed. ایم ایڈ							
Technical Education if any فنی تعلیم، نام تحریر کیا جائے	Passed BA Examination from AIOU Islamabad under Roll No 423583 obtng mark 1100/667 session 2017						
P.T.C پی-ٹی-سی							
S.V. ایس-وی							
C.T. سی-ٹی							

(i) Date of attaining Sixty years of age _____

(تاریخ ساٹھ سالگی)

(ii) Date of attaining twenty five years service _____

(تاریخ تکمیل ملازمت پچیس سال)

National
Office
13.11

BY DIST. OFFICER (FEMALE) KHANSAH

BY DIST. OFFICER (FEMALE) KHANSAH

Name ----- NAZIA BAZI

(نام)

Nationality and Religion ----- Pakistani (Bazi)

(قومیت اور مذہب)

Residence ----- Dargai Sawabki

(مستقل رہائش)

Father's name and residence ----- BAZI FAIZUL HUSSAIN

(والد کا نام اور پتہ)

Date of birth by Christian era as nearly as can be ascertained ----- 4-1-1985

(تاریخ پیدائش مطابق سن عیسوی)

Exact height by measurement ----- 5-0

(قد و قامت)

Personal mark of identification ----- Nil

(آشنان شناخت)

Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھوٹا) Ring Finger (چھنگلیا کے ساتھ کی انگلی) Middle Finger (انگشت میاند)
Fore Finger (انگشت شہادت)

Signature of Government Servant ----- Nazia Bazi

Signature and designation of the Head of the office or other Attesting officer -----
DISTR. OFFICER (S&L)
FEMALE, KOHISTAN

District Edu. Officer
(Female) Swabi

Handwritten signature and stamp: DISTR. OFFICER (S&L) FEMALE, KOHISTAN

Corrigendum Order issued vide EOD KH about Residency of the officials. Please read District Swabi instead of Kamilla Encl NO: 8795-98 dated 11/11/2008. The entries in this page should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے مندرجات کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 کے خطوطوں کے نیچے تاریخ لکھنی چاہتے ہیں۔ انگلیوں کے نشانات کے لیے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

District Education Officer
(Female) Kohistan

Sub Divisional Education Officer
(Female) Kohistan

SDP KO

1. Name of Post	2. Whether substantive officiating any whether permanent or temporary	3. If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) Volume II	4. Pay in substantive post		5. Additional pay for Officiating		6. Other emoluments falling under the term pay	7. Date of appointment
			Rs.	Ps.	Rs.	Ps.		
DTL GEPs	عارضی مستقل	رول کے مطابق نہیں کا			2415/-			8/12/06
K.A. Sec	عارضی مستقل	رول کے مطابق نہیں کا						
GEPs		R.B.N. No 50/2780-135-18303						
Gajal					2780/-			12/07
					2780/-			12/07
		R.B.S-5 (P) 3340-160-8140						
			Rs		3340/-			12/08
			Rs		3340/-			12/08

S.D.E.O.
Mohi

SDEO (Female)
Mohi

[Large handwritten signature and scribbles covering the bottom half of the page]

10.	11.	12.	13.	14.	15.	
Date of termination of 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	Allocation of periods of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the Office or other attesting Officer	Reference to any recorded punishment to censure, or reward, or praise of the Government servant
2016/07	Resigned	[Signature]	[Signature]	Appointed as PTC Teacher in B/S-5 (2415-115-5865) Plus usual allowances as due & admissible under the rules vide EDO BTL Kohistan under endst. No. 8876-42 Dated 7/19/2006.	[Signature]	
2011/07	Resigned	[Signature]	[Signature]	[Signature]	[Signature]	
2010/08	Resigned	[Signature]	[Signature]	[Signature]	[Signature]	Services Verified w.e.f. 8-12-06 to 2011-07 from acq. Roll & other records of this office.
2010/05	Resigned	[Signature]	[Signature]	[Signature]	[Signature]	Services Verified w.e.f. 1-12-07 to 30-11-08 from acq. Rolls & other records of this office.
2010/05	Resigned	[Signature]	[Signature]	[Signature]	[Signature]	Pay released by EDO (EASE) Kohistan from 1/2/2010 to upto date & the intervening period w.e.f 1/1/2010 to 31/1/2010 one month should be treated extraordinary leave with out pay vide EDO...
2010/05	Resigned	[Signature]	[Signature]	[Signature]	[Signature]	Drawn pay & allow: due to release of pay w.e.f: 1-5-2010 to 30-04-2010. Total 22424/-. dt: 21-5-2010.
2010/05	Resigned	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]

AS.D. (Female) Kohistan

District Edu. Officer (Female) Swat

Deputy Dist. Officer (Female) Kohistan

District Education Officer (Female) Kohistan

Sub Divisional Officer (Female) Kohistan

Reverse Date

1.	2.	3.	4.	5.	6.	
Name of Post	Whether substantive officiating any whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) Volume II	Pay in substantive post	Additional pay for Officiating	Other emoluments falling under the term pay	Date of appointment
درجہ ملازمت	عارضی مستقل یا قائم مقام	اگر عارضی ستاؤ رول کے مطابق پیش کش کا حق ہے؟	تنخواہ بطور عارضی ملازمت	زائد تنخواہ بطور قائم مقام	ماسوائے تنخواہ دیگر	تاریخ تقرری
Revised due to Awarded BPS 7 fixation on PTK & PA w.e.f 17-9-2010						
BPS=07 (3530-190-9230)						
CGPS Bar			3530/4			17/9/2010
Komila						
BPS=7 (5800-320-15400)						
— II —			5800/2			07/12/2011
Emp's cancelled and attested						
CGPS Bar	W/O (Female) Kohistan		3340/2			12/12/2008
Komila						
— II —			3340/2			12/1/10
BPS=05 (5400-260-13200)						
— II —			5400/2			7/12/2011
CGPS Bar			5400			10/1/2011
Komila						

10.	11.	12.	13.	14.	15.	
Date of termination of 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	Allocation of periods of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debit to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment to censure, or reward, or praise of the Government servant
تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا بطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین گروٹ سے رقم ادا ہوگی	دستخط افسر مجاز	سزایا جزا یا غیر مناسب کارکردگی کارپکارڈ
			Period	Government to which debit		
			عرصہ	گروٹ سے رقم ادا ہوگی		

Sora-II verified for 5/2010.

District Education Officer
Kohistan
21/5/2010

30-6-2011

9-30-2011 Transfer to Distt: Swat

Service verified from 1-12-08 to 30-11-09 from Reg. Roll of SWS Record of SWS

District Education Officer (Female) Kohistan

30-11-10 Pay fixed

District Education Officer Kohistan

Allowed graded pay on passing P.T.C exam vide EDD EGSE Edu Kohistan under

Order No: 8389-91 Dated 5-11-2010

30-6-2011 S/R

District Education Officer Kohistan

District Education Officer (Female) Swat

9-30-2011 Transfer to Swat

District Education Officer Kohistan

District Education Officer Kohistan

Service verified from 1-12-2009 to 30-9-2011 from Reg. roll & all record of this

30-11-2011 Annual increment

District Education Officer Kohistan

District Education Officer (Female) Kohistan

Sub Divisional Education Officer Kohistan

1.	2.	3.	4.	5.	6.	
Name of Post	Whether substantive officiating any whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service courts for pension under rule 320 of C.S.R. (Pb.) Volume II اگر عارضی ہے تو رول کے مطابق پیش کش کا مستحق ہے؟	Pay in substantive post تنخواہ بطور عارضی ملازمت	Additional pay for Officiating زائد تنخواہ بطور قائم مقام	Other emoluments falling under the term pay ما-وائے تنخواہ دیگر الاؤنس	Date of appointment تاریخ تقرری
			Rs. Ps.	Rs. Ps.		
PST L.P.S. Razi, Bahadur	عارضی مستقل یا قائم مقام		BPS-05 (5400-260-13200)			
Kathy Laxar		Temp/Off	Rs. 5660			12/2011
			(BPS-12 @ Rs. 7000 - S.O. 22000)			
			Rs. 7000			01/12/12
			Rs. 7000			01/12/12
			Rs. 7500			01/12/13
			Rs. 8000			01/12/14
			(BPS-12 @ Rs. 9055-657-28155)			
			Rs. 10355			01/12/15
			Rs. 11005			12/2015
S/R	B-12		(11140-800-35140)			
				13540/-		1/16
				14340/-		1/16
S/R	B-12		(13320-960-42120)			
				17160/-		1/17

SPEC (Female) Kohistan

Handwritten signature and notes on the left side of the table.

10.	11.	12.	13.			
Date of termination of 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 periods of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment to censure, or reward, or praise of the Government servant
تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین گونہ حصہ قابل ادائیگی	دستخط افسر مجاز	سزایا بڑایا غیر مناسب کارکردگی کا ریکارڈ
				Period عرصہ	Government to which debitable گورنمنٹ جسے قابل ادائیگی	

30/12
 SD (F) Lahore
 Sub Divisional Education Officer
 Female, Lahore Swabi

22/12
 SD (F) Lahore
 Sub Divisional Education Officer
 Female, Lahore Swabi

30/12
 SD (F) Lahore
 Sub Divisional Education Officer
 Female, Lahore Swabi

30/12
 SD (F) Lahore
 Sub Divisional Education Officer
 Female, Lahore Swabi

30/12
 SD (F) Lahore
 Sub Divisional Education Officer
 Female, Lahore Swabi

22/12
 SD (F) Lahore
 Sub Divisional Education Officer
 Female, Lahore Swabi

cc 9/8
 9/12
 Drm Rs 657265/-
 on acc of pay and allow.

01/03/2012 to 22/10/2012

SD (F) Kohistan
 District Edu. Officer
 (Female) Swabi
 District Education Officer
 (Female) Kohistan

SD (F) Kohistan
 Sub Divisional Education Officer
 (Female) Kohistan

1. Name of Post	2. Whether substantive officiating any whether permanent or temporary	3. If officiating state (i) substantive appointment or (ii) whether service courts for pension under rule 320 of C.S.R. (Ph) Volume II	4. Pay in substantive post		5. Additional pay for Officiating		6. Other emoluments falling under the term pay	7. Total Pay as per appointment
			Rs.	Ps.	Rs.	Ps.		
درجہ ملازمت	عارضی مستقل قائم مقام	اگر عارضی ہے تو رول کے مطابق پشاور کا تعلق ہے؟						
			Rs. 18120/-					12/17
			Rs. 19080/-					12/18
			Rs. 20040/-					12/19
Reinstatement order vide DEO (F-2) Kohistan No 7109-16 Dated 11-7-2020								
B-12			Rs. 16200/-					4/2019 (80)
			Rs. 17160/-					12/19 (80)
			Rs. 10355/-					12/15
			Rs. 11005/-					12/15
			(11410-800-35140)					
			Rs. 13540/-					12/16
			14340/-					12/16
			(13320-96-42120)					
			Rs. 17160/-					12/17

A.S.D. (F-2)
 P. Dasgupta
 P. Dasgupta

SDEO (Female)
 Kohistan

S/R

S/R

10.	11.	12.	13.	14.	15.	
Date of termination of 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	Allocation of periods of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment to censure, or reward, or praise of the Government servant
تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رضخت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط آوازہ کا تعین	دستخط افسر مجاز	سزایا یا غیر سزا کا کارکردگی کارپکار
			Period	Government to which debitable		

Reinstatement order

Consequent upon the Judgment Dated 27-8-2019 Passed by Honorable KPM Peshawar Service Tribunal Mr. Nazim Dazi Pst District Kohistan is hereby reinstated into Government Service against Vacant Post of G/GPS Goshali Vide Encl No 7109-16 Dated 16-7-2020 DEO (F) Kohistan Upper

Remitted
D/A

Sub Divisional Education Officer (Female) DASSU

Notification

If Demol inquiry officer recommended Recommendation by 16 month pay and office order vide of DEO (F) of recommendation of inquiry officers issued order of DEO (F) Kohistan No 7307-14 Dated 10-9-2020

DEO (Female) Kohistan

District Education Officer (Female) Kohistan

ASD Circle DASSU Kohistan

Sub Divisional Education Officer (Female) DASSU

District Education Officer (Female) Kohistan

SD Kohistan

District Education Officer (Female) Kohistan

Sub Divisional Education Officer (Female) DASSU Kohistan Upper

ASD

56
er,
ista
es:-

Certificate
 All entry Revised entry
 of the book also service verified

9. Name and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8	10. Date of termination of appointment	11. Reason of termination (such as promotion, transfer, dismissal etc.)	12. Signature of the Head of the Office or other Attesting officer	13. Nature and duration of leave taken:	14. Allocation of periods of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	15. Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment to censure, or reward, or praise of the Government servant
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی طبعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین Period Government to which debtible عرصہ	دستخط افسر مجاز	سزایا جزا غیر مناسب کارکردگی کار پیکار

Arrears Bill released by DEO
 Kohistan vide order bearing No
 66-11 dated 07-06-2021 w.e.f.
 4-9-2019 to 31-12-2020

S.D.E.O (F)
 Dassu

S.D.E.O (F)
 Dassu

2350
 22/6/2021
 Source is verified for
 6/2021, due to release
 of pay. adj. for arrears
 w.e.f. 4-9-2019 to 31-12-2020.
 Gram No 446303/2

[Signature]
 SDEO (Female)
 Kohistan

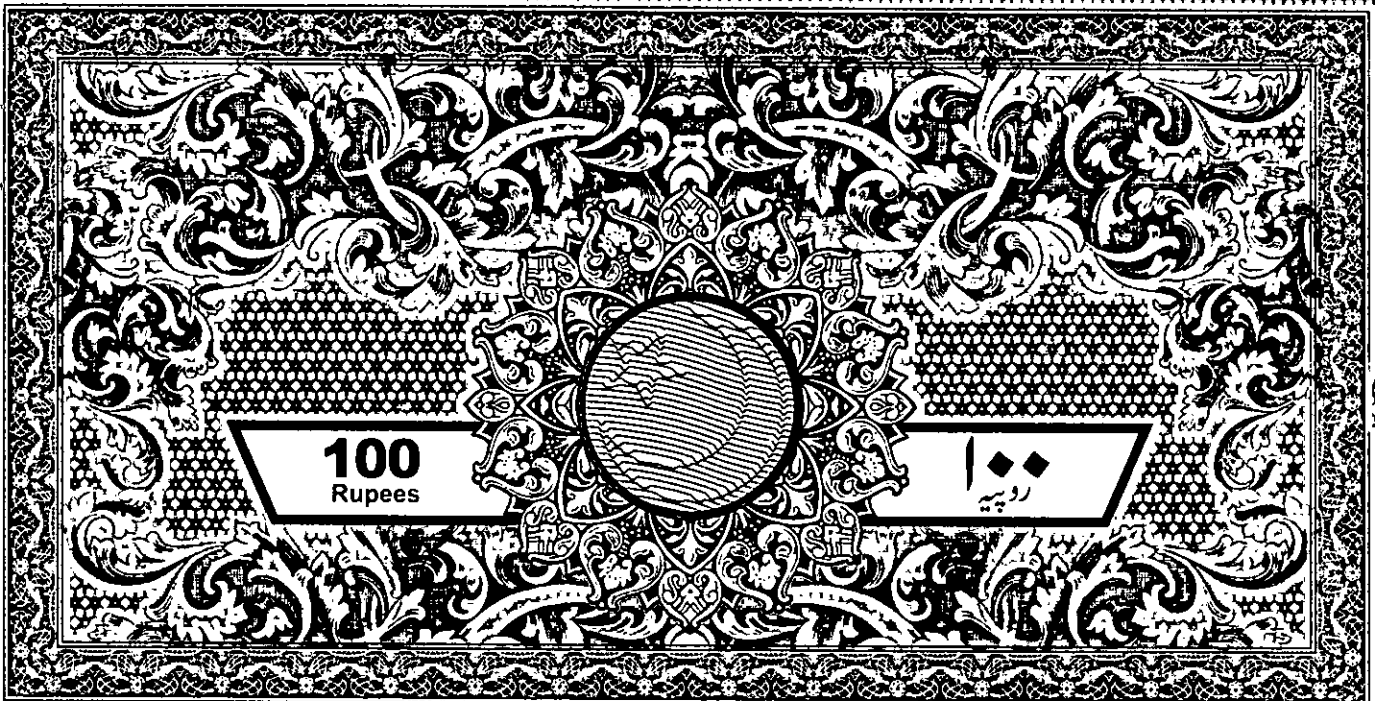
[Signature]
 District Education Officer
 (Female) Kohistan

[Signature]
 District Education Office
 (Female) Kohistan

[Signature]
 A.S.D. (F)
 (District Dassu) Kohistan

[Signature]
 District Education Officer
 Kohistan
 Sub Divisional Ed.
 (Female)

on reverse - date



P.O.F.
15/07/22
Member (Judicial)

بجالات سبزوین ڈیپٹی چیف جسٹس صاحب

بیانِ حلفی
میں کہ شاہ ولی اللہ صاحب زادہ Ado litigation کے نام سے
ذرائع (کے) کے ساتھ میں نے سماعت: نازیب خاص وک
خاصی حق (Appellant) کا نام میں نے یاد رکھا ہے کہ طالب
درست جمع ہے میں حالت نہ سائل کے ذرائع سے نظر ہوا ہے (میں نے) اور

بیانِ حلفی بلکہ (میں) مرتبہ میں حالت کے علم، حق

۱۵ 7 2022
کے مطابق بائبل درست و جمع میں

شاہ ولی اللہ صاحب زادہ

CNIC # 13401-1051239-7
Cell = 0345-9588038



15/9/2022
شماره سند 159/ACC (P) 11-11-2020

Receipts
13 Jul 2022
Peshawar

HAROON YAR MUHAMMAD
STAMP VENDOR
Licence No. 159/ACC (P) 11-11-2020
(District Court Peshawar)
PESHAWAR TREASURY

(84)

ENQUIRY IN RESPECT OF MST. NAZIA QAZI PST GGPS GOSHALI

ENQUIRY COMMITTEE:

1. Mr Ghulam Sarwar I/C Principal GCMHS Dassu.
2. Mr. Khurshid Khan SST GHS Seo.

REFERENCES

With reference to the DEO (F) Kohistan office order No 735-39/Lit/DEO (M) KH Dated 19/03/2021 enquiry in respect of Mst Naiz Qazi regarding tempering of the thumb print in the service book (Medical certificate enquiry report is as under.

PROCEDURE/ METHODOLOGY:

1. Questionnaire Method.
2. To go through the previous "De-Novo enquiry report", conducted on 03/08/2020.
3. To take thumb/finger print on a plain paper.
4. Personal hearing.

FINDINGS:-

According to the previous enquiry "De-Novo report" the teacher was initially appointed on 07/12/2006 by the DEO (F) Kohistan representing as local but the corrigendum order was issued by the same office on 04/12/2010 that shows an astonishing official approach of DEO (M/F) Kohistan. The performance record of the teacher of her school period in District Kohistan was thoroughly checked which was satisfactory.

The teacher provided written answers to the questionnaire comprising sixteen questions, in the light of court's decision, previous enquiry report, oral responses, written responses and feedback/interviews from various people, it is clear that the teacher is honest and dutiful.

We have taken her thumb/finger print on plain paper as a sample to match with the thumb/ finger print of the service book and medical certificate.

Her service book/ Medical certificate have finger prints twice but according to her written statement the SDEO (F) Dassu office applied them, but she does not know the purpose of it.

The former SDEO (F) Dassu Mst. Zakia Jabeen's (Period 2007 to 2009) attestation on her service book shows that the finger/ thumb print are her own and correct.

89

ADDEO (PY)

UP

on

file

11-11-21



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER

Consequent upon approval by the Competent Authority Mst. Nazia Qazi, PST, BPS-12, GGPS Goshali Kohistan Upper is hereby transferred/ adjusted against the vacant post of PST BPS-12 at GGPS, Rokhani District Swabi on her own pay & BPS in the interest of public service with immediate effect.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA etc. are allowed
3. The DEOs concerned is directed to check/verify her original service documents before handing over charge to her under intimation to this office.
4. Her seniority will be determined at the bottom of the seniority list of PST (11-12) as per rules.

Director,
Elementary & Secondary
Education Khyber Pakhtunkhwa

Endst.No: 2782-85 /P.No.574/Vol-III/F/G/Transfer Dated Peshawar the 5/12/2022

Copy for information to:

1. District Education Officers (Female) Kohistan Upper.
2. District Education Officers (Female) Swabi.
3. District Account Officer Kohistan Upper
4. Head teacher concerned
5. Teacher concerned.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
7. M/FILE.

Assistant Director (Female)
Elementary & Secondary
Education Khyber Pakhtunkhwa

[Signature]
District Education Officer
(Female) Kohistan

District Education Officer
(Female) Kohistan

Dr. MUNAZIR/Transfer Order/Transfer Order Doc

[Signature]
SDEO (Female)
Kohistan



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE KOHISTAN

OFFICE ORDER

Subject:- **PAY RELEASE AND ARREAR BILL R/O MST: NAZIA OAZI PST GGPS GOSHA**
Memo:-


In the light of the recommendation of inquiry committee report of MST: Nazia Qazi PST Goshali is hereby released of pay and the due arrear bill as per recommendation of inquiry off granted.

District Education Officer
(Female) Kohistan

Endst: No. 1366-71 /DEO (F) KH Dated 07.06 /2021

Copy forwarded to :-

1. District Account officer Kohistan
2. SDEO (F) with the direction for implementation
3. ASDEO Circle Dassu
4. PA to DEO (F) Kohistan
5. Official concerned
6. Office copy.


District Education Officer
(Female) Kohistan

07/6
with original S/Bank of MST
Nazia Qazi PST Goshali
Goshali

7/6/2021

Nazia Qazi
22.07.2020

Mr. Muhammad Amin Ayub, Advocate for the appellant is present. Mr. Kabirullah Khattak, Additional AG alongwith representatives of the department Rehana Yasmeen, District Education Officer (Female) Upper Kohistan and Mr. Muhammad Saddique, Litigation Officer are also present.

2. Learned counsel for the petitioner submitted that the judgment of this august Tribunal dated 27.08.2019 has not been implemented in its letter and spirit and undue delay in its implementation has been made to her prejudice violating her rights as the order was passed by the District Education Officer (Female) Kohistan with inordinate delay. That her colleagues having a similar grievance has been adjusted much earlier and posted in their home districts but discriminations have been meted out to petitioner she is seeking the indulgence of this Hon'ble Tribunal.

3. On the other hand, learned Additional AG submitted that the judgment referred to above passed by the Khyber Pakhtunkhwa Services Tribunal, has been implemented by virtue of reinstatement order made by the District Education Officer (Female) Kohistan on 16.07.2020 vide Endorsement bearing No. 7109-16/DEO (F) KH/liti: therefore, nothing remains to be executed before this S.B. As regard making of reference to the appeal of other Government officials, the Hon'ble Tribunal in its judgment has stipulated a definite time span within which the de-novo inquiry has to be completed whereas in the referred to judgment for implementation in the instant execution petition no period for conclusion of de-novo inquiry has been given therefore, the stance taken by the petitioner is not tenable.

4. It is on record that by virtue of the judgment of this Tribunal dated 27.08.2019, on acceptance of appeal of petitioner, the impugned order dated 22.10.2015 was set-aside and respondents were directed to conduct de-novo inquiry strictly in accordance with law and rules. In compliance thereof the respondents by virtue of endorsement bearing no. 7109-16/DEO (F) KH/liti: made by the District Education Officer (Female) Kohistan, the judgment of this august Service Tribunal has been given effect and accordingly the petitioner has been reinstated into government

service against the post of PST (B-12) at GGPS Goshali District Kohistan, subject to the result of findings of de-novo inquiry here it is to be observed with concern that the judgment passed by this Tribunal has been implemented belatedly but one may also observe that due to spread of pandemic COVID-19 there was complete lock down for a substantial period of three months which could not be ignored and that period has to be excluded when no official work was performed. As regard the posting and transfer in the home district this is the internal matter of the department which can post a civil servant to one place or another or one district or the other though the order passed in this regard should not be arbitrary or based on discrimination. Posting and transfer of a civil servant is included in his terms and conditions of service and no one is exempted from the same therefore, in case of acting upon the judgment of this Tribunal passed on 27.08.2019 no other issue remain to be pondered and consequently executed. In the circumstances the execution petition is filed without further proceedings.


(MUHAMMAD JAMAL KHAN)
MEMBER

ANNOUNCED
22.07.2020

06.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 29.06.2020 for the same. To come up for the same as before S.B.


Reader

29.06.2020



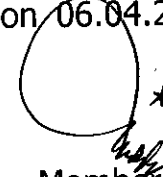
The Worthy Chairman is on leave, therefore, the case is adjourned. To come up on 22.07.2020 before S.B.


Reader

Form- A
FORM OF ORDER SHEET

Court of _____

Execution Petition No. 35 /2020 ○

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	27.01.2020	<p>The execution petition of Mst. Nazia Qazi submitted today by Mr. Khaled Rehman Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR <u>27/11/2020</u></p> <p style="text-align: center;">This execution petition be put up before S. Bench on <u>28/02/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-	28.02.2020	<p>Counsel for the petitioner present. Addl: AG for respondents present. Notices be issued to the respondents for submission of implementation report. To come up for implementation report on <u>06.04.2020</u> before S.B.</p> <p style="text-align: right;"> Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 35 /2020

IN

Service Appeal No. 372 /2016

Mst. Nazia Qazi..... Petitioner

Versus

The Govt. of KPK and others..... Respondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Execution Petition with Affidavit			1-2
2.	Judgment of this Hon'ble in Appeal No. 372/2016	27.08.2019	A	3 - 5
3.	Application		B	6
4.	Wakalat Nama			7

Through

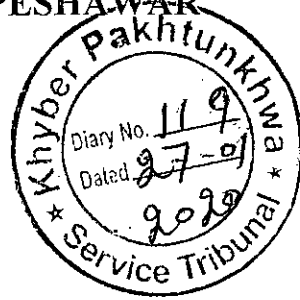
Nazia
Petitioner

Khaled Rahman
Advocate,
Supreme Court of Pakistan
4-B, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458
Cell # 0345-9337312

Dated: 24 /01/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 35 /2020
IN
Service Appeal No. 372 /2016



Mst. Nazia Qazi D/o Muhammad Akbar,
R/o village Yaqubi Tehsil Lahore Swabi,
Ex: PST, Teacher GPS Razi Bahadar
Kotay Yaqoobi Swabi.....

Petitioner

Versus.

1. The Govt. of Khyber Pakhtunkhwa
through Secretary
Elementary & Secondary Education Department,
Civil Secretariat, Peshawar
2. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female)
District Kohistan.
4. District Education Officer (Female)
District Swabi.
5. District Account Officer,
District Swabi.
6. District Account Officer,
District Kohistan.....

Respondents

Execution Petition for directing the Respondents to implement the Judgment of this Hon'ble Tribunal dated 27.08.2019 passed in Service Appeal No.372/2016.

Respectfully Sheweth,

1. That petitioner had filed Service Appeal No.372/2016 which was allowed by the Hon'ble Tribunal vide Judgment dated 27.08.2019 (*Annex:-A*) in the following terms:

"As a sequel to the above, the instant appeal is accepted, impugned order dated 22.10.2015 is set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with law and rules.

2. That after obtaining attested copy of the order, petitioner submitted the same to the Departments through application (*Annex:-B*) for implementation in accordance with law but the Department failed to implement the same as per the directions of the Hon'ble Tribunal.
3. That moreover, at the time of announcement of judgment, the representatives of the Respondents were available and they were fully in the knowledge of the judgment but inspite of the same they failed to honour the above captioned judgment of this Hon'ble Tribunal which amounts to the violation of the lawful order.

It is, therefore, humbly prayed that Execution proceedings may kindly be initiated against the Respondents for implementation of the judgment of the Hon'ble Tribunal.

Through

[Signature]
Petitioner

[Signature]
Khaled Rahman,
Advocate,
Supreme Court of Pakistan

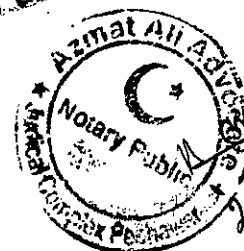
Dated: 24/01/2020

Affidavit

I, Mst. Nazia Qazi D/o Muhammad Akbar, R/o village Yaqubi Tehsil Lahore Swabi, Ex: PST Teacher GPS Razi Bahadar, Kotay Yaqoobi Swabi, do hereby affirm and declare on oath that the contents of this Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

[Signature]
Deponent

ATTESTED



Annex A - 3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 372/2016

Date of Institution: 06.04.2016

Date of Decision: 27.08.2019



Mst. Nazia Qazi daughter of Muhammad Akbar resident of Village Yaqubi Tehsil Lahore District Swabi, Ex-PST Teacher GPS Razi Bahadar Kotay Yaqoobi Swabi (Appellant)

VERSUS

The Director (E&SE), Khyber Pakhtunkhwa, Peshawar and five others. (Respondents)

Present:

- MR. YAQOOB KHAN, Advocate --- For appellant.
- MR. KABIRULLAH KHATTAK, Additional Advocate General --- For respondents.
- MR. AHMAD HASSAN, MEMBER (Executive)
- MR. MUHAMMAD HAMID MUGHAL, MEMBER (Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the parties heard and record perused

ARGUMENTS

02. Learned counsel for the appellant argued that after observance of all codal formalities, she was appointed as PST in District Kohistan vide order dated 07.12.2008. As she possessed the domicile of District Swabi, therefore, through order dated 20.09.2011, she was posted in District Swabi and started performing duty. After putting in nine years service, she was removed from service vide order dated 22.10.2015 issued by respondent no.3. Feeling aggrieved, she filed departmental

ATTESTED
EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

ATTESTED

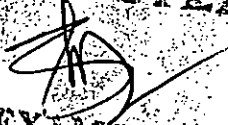
through personal efforts. It was issued without fulfillment of requirement laid down in the relevant rules thus was arbitrary, illegal and unlawful. The appellant was denied the opportunity of defense. Reliance was placed judgment of this Tribunal dated 22.03.2019 passed in service appeal no. 716/2016, whereby a case of similar nature was referred to the respondents to conduct de-novo enquiry.

03. Learned Addl. Advocate General that she was illegally appointed and when the matter came to the notice of respondents the then DEO, Kohistan was directed to conduct enquiry. Enquiry report confirmed that her appointment was not in the prescribed manner laid down in the rules thus the same was illegal. On the basis of the said enquiry major penalty of removal from service was imposed on the appellant and other teachers. All codal formalities were observed before passing the impugned order.

CONCLUSION

04. The stance of the appellant about her regular appointment vide order dated 07.12.2008 and subsequent transfer to District Swabi through order dated 20.09.2011 was vehemently opposed by the respondents. They leveled allegations of serious irregularities in the appointment process which was confirmed on the basis of enquiry conducted by the then DEO, Kohistan. Enquiry report revealed that her appointment was illegal and made in utter disregard to the laid down criteria. As a sequel to enquiry report major penalty of removal from service was awarded to the appellant vide order dated 22.10.2015 issued by respondent no. 3.

ATTESTED



EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

ATTESTED



irregularities that surfaced during the appointment of the appellant. However, they made a serious mistake by conducting fact-finding enquiry that has no legal sanctity and any penalty awarded on the basis of such enquiry is not sustainable in the eyes of law. In order to award punishment to a civil servant he was required to be proceeded under E&D Rules 2011. Needless to point out that in the enquiry in question, the appellant was not associated with the proceedings thus condemned unheard. The only safer course left with the respondents is to conduct enquiry in accordance with the spirit of E&D Rules 2011 and thereafter may pass any order as deemed appropriate. The principle of consistency also demands that the case of the appellant be dealt with as per judgment of this Tribunal dated 22.01.2019 and 22.03.2019, as similar question of facts and law are involved.


06 As a sequel to the above, the instant appeal is accepted. Impugned order dated 22.10.2015 is set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with law and rules. Parties are left to bear their own costs. File be consigned to the record room.


 (MUHAMMAD HAMID MUGHAL)
 MEMBER


 (AHMAD HASSAN)
 MEMBER

ANNOUNCED
 27.08.2019

Date of Presentation of Application 04-09-19
 Number of Pages 1600
 Copying Fee 20-00
 Urgent 4-00
 Total 24-00
 Name of Copy [Signature]
 Date of Completion of Copy 04-09-19
 Date of Delivery of Copy 04-09-19

Certified to be true copy

 Khwaja Muhammad Inayatullah
 Service Tribunal
 Peshawar

ATTESTED

6-
بکھنور جناب ڈائریکٹر صاحب خیبر پختونخوا ایجوکیشن پشاور
Annex 'B'
درخواست بمقام تقرری سائلہ بروئے فیصلہ عدالت سروسز ٹریبونل پشاور

جناب عالی! درخواست حسب ذیل عرض ہے۔

- ۱۔ یہ کہ سائلہ ضلع صوابی میں بطور استانی تعینات تھی جو کہ نوکری سے برخواست کر کے سائلہ نے سروسز ٹریبونل پشاور سے رجوع کی۔ جو کہ اپیل بحق سائلہ منظور ہو چکی ہے۔
- ۲۔ اسی طرح چار (4) اور استانیاں بہ اسم مسماة رقیہ، مسماة عالیہ غفور، مسماة انیلہ اقبال اور مسماة مسرت بیگم بروئے اسی فیصلہ پر بحال ہو چکی ہے۔ اس لئے سائلہ بھی اس فیصلے پر تعیناتی / بحالی کی حقدار ہے۔ (نقل فیصلہ جات اور حکم تقرری لف ہے) استدعا ہے کہ منظور کی درخواست ہذا فیصلہ عدالت سروسز ٹریبونل پر عملدرآمد کر کے سائلہ کی تقرری کی احکامات صادر فرمایا جائے۔

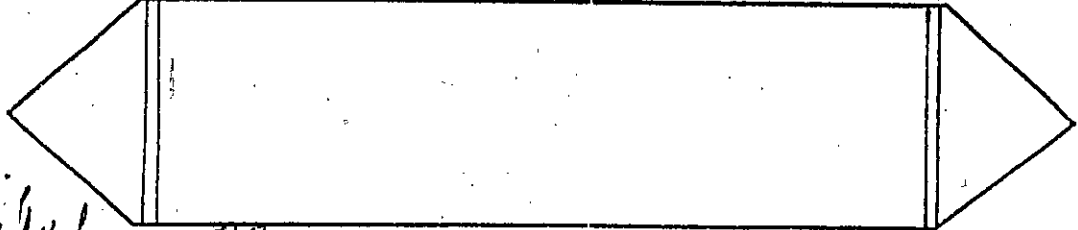
العارضة

مسماة نازیہ قاضی PST صوابی
Jia

9

ATTESTED

بعدالت
سرور سید محمد علی



2020ء منجانب اسلام آباد
مستند

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا اوقات نامہ لکھ دیا کہ سند ہے۔

المرقوم ۲۶ _____ ماہ جنوری 2020ء

العبد _____ واہ العبد _____

بمقام
_____ کے لئے منظور ہے۔