

26.07.2022

Junior to counsel for appellant present.

Naseer Ud Din Shah learned Assistant Advocate General for respondents present.

Reply on behalf of respondents is still awaited. Learned AAG requested for time to submit reply/comments. Opportunity is granted. To come up for written reply/comments on 13.10.2022 before S.B.



(Rozina Rehman)
Member (J)

25.05.2022

Mr. Muhammad Irshad Mohmand, Advocate for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant is aggrieved of the impugned order of respondent No. 3 dated 22.01.2022 whereby her appointment order as CT (BS-15) dated 04.11.2021 was withdrawn on the ground of possessing B.A degree from fake, illegal, unlawful and unrecognized institute of (Islamic University of Pakistan Sialkot, Punjab). Feeling aggrieved the appellant submitted departmental appeal which does not contained any date but the same was not decided within the statutory period whereafter the instant service appeal was filed in the Service Tribunal on 13.05.2022. It was further argued that the appellant acquired B.A degree from the (Islamic University of Pakistan Sialkot, Punjab) in the year April, 2011 and which also exists even today duly recognized by the Higher Education Commission. However, the appellant has been condemned unheard as no enquiry has ever been conducted before imposition of the said penalty i.e. withdrawal of her appointment order dated 04.11.2021 only after about 2 and half months. On a question from the court that had the appellant received salary during the period? It was replied that salary was not paid to the appellant by the respondents despite the fact that she took over the charge on the very next of her appointment date i.e. 05.11.2021 and did perform her duty, he concluded.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 26.07.2022.

(Mian Muhammad)
Member (E)

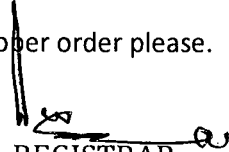

Rs-600/-
Appellant Deposited
Security & Process Fee
A. J. 02/6/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 788/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/05/2022	<p>The appeal of Mst. Chaman Sultan presented today by Mr. Muhammad Irshad Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	23/5/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>25-5-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No: 788 /2022

Chaman Sultan

(Appellant)

VERSUS

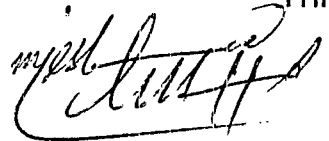
Govt of KPK, through Secretary E & SE Department Peshawar and
Others

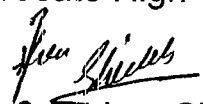
(Respondents)

INDEX

S.No.	Description of document	Annex	Pages
1	Service Appeal		1-6
2	Affidavit		7
3	Address of parties		8
4	Copy of Academic Records	"A"	9-14
5	Copy of Advertisement	"B"	15
6	Copy of the Result	"C"	16
7	Copy of Appointment order, issued vide dated 04-11-2021.	"D"	17-19
8	Copy of Charge / Arrival Report	"E"	20
9	Copy of impugned office order Endst No 416-28 dated 22/01/2022	"F"	21
10	Copy of Departmental Appeal / Representation	"G"	23
11	Wakalatnama		24

چمان سلطان
Appellant:-Chaman Sultan
Through


Muhammad Irshad Mohmand
Advocate High Court


& Farhan Sheikh
Advocate

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No:

/2022

Chaman Sultan w/o Saud Nawaz R / o Quom Utmankhel,
Tappa Abba Khel Tehsil Abba Khel Lower, District Orakzai

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department, Peshawar
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. District Education Officer (DEO) District Orakzai
4. Higher Education Commission through its Chairman, Sector H-9 Islamabad.

(Respondents)

Service Appeal Under Section 4 Of Khyber Pakhtunkhwa Service Tribunal Act 1974 against the office order Endst No 416-28 dated 22/01/2022 whereby the appointment order of petitioner has been withdrawn / cancelled, And the Departmental Appeal / Representation of the Appellant has not been responded & decided within the stipulated period.

PRAYER

On acceptance of this Service Appeal on behalf of Appellant, the impugned office order Endst No 416-28 dated 22/01/2022 whereby the appointment order of Appellant has been withdrawn / cancelled be declared illegal against the service rules and is liable to be set-aside and the Appellant be reinstated to her service along with back benefits.

Any other remedy which this August Tribunal deems fit and appropriate may also be granted to the Appellant.

=====

Respectfully Sheweth:-

The brief facts leading up to the filing of this Service Appeal are as under:-

1. That the Appellant is law abiding citizen of Pakistan belonging to respectable family and resident of Orakzai Agency Now Tribal District and having qualification up to B.A.(Copy of Academic Records is attach as Annex "A")
2. That the Respondents advertised different posts in Education Department through ETEA and invited application from legible and qualified candidates and as per advertisement the Appellant applied for the post of Certified Teacher (CT) in BPS-15 mentioned at Serial No 01 in the advertisement against the vacant post.(Copy of Advertisement is attach as Annex "B")
3. That thereafter the Appellant appeared in the written test conducted through ETEA by the Respondents, wherein the Petitioner has got 40 marks out of 100 and it is pertinent to mention here that the total post were 55 but the ETEA test was only qualified by 25 candidate including the Appellant in the entire District(Copy of the Result is Attach as Annex "C")

3

4. That after passing of written test, the Appellant was called for interview conducted by the Respondents and the same was also qualified by the appellant being on better position, and thereafter the Respondent issued the appointment order of appellant vide office order dated 04-11-2021, wherein the name of appellant is mentioned at S.No 19. **(Copy of Appointment order issued vide dated 04-11-2021 is attach as Annex "D")**

5. That after adopting all the legal formalities, the Appellant also submitted her charge / arrival report on 05-11-2021 in the concerned school.**(Copy of Charge Report is Attach as Annex "E")**

6. That from the date of joining of duty, the Appellant was performing her duty with honestly and no complaint has been made by any staff members against the appellant but the Respondent No 3 / District Education Officer Orakzai without any lawful justification and without conducting inquiry issued office order Endst No 416-28 dated 22/01/2022 whereby the appointment order of Appellant was withdraw / cancelled **(Copy of impugned office order Endst No 416-28 dated 22/01/2022 is attach as Annex "F")**

7. That thereafter the Appellant filed Departmental appeal / representation before the Respondent No.3 for reinstatement into her service but the same was not responded & decided in the stipulated / statutory period.**(Copy of Appeal / Representation is attach as Annex "G")**

8. That the Appellant being mortally aggrieved from the impugned office order Endst No 416-28 dated 22/01/2022 and non responding of departmental appeal / application filed by the appellant, therefore approach this Honorable Tribunal for declaring the impugned office order Endst No 416-28 dated

4

22/01/2022 whereby the appointment order of Appellant has been withdrawn / cancelled be declared to be illegal, without jurisdiction, without lawful authority, unwarranted based on malafide and ulterior motive and liable to be struck down by directing the Respondents to reinstate the Appellant to her service with all back benefits on the following grounds:-

GROUND

- A.** That the impugned office order Endst No 416-28 dated 22/01/2022 issued by the Respondent No.3 is illegal, unlawful, without lawful authority, without jurisdiction and ineffective upon the valuable rights of the Appellant, hence not tenable and liable to be set aside by reinstating the appellant with all back benefits.
- B.** That the appellant has been gone through the long process of recruitment including of qualifying of ETEA test and the ETEA test was only qualified by 25 candidates including the appellant, and thereafter the appointment order of appellant was issued vide order dated 04-11-2021 and after joining the service, the appellant performed her duty for more than 3 months but no salary has been paid for that period, moreover the Respondent without proper inquiry in the instant matter and with one stroke of pen the appointment order of appellant has been withdraw / cancelled in disregard of law.
- C.** That it is pertinent to mentioned here that the appellant has obtained her Bachelor Degree from the Islamic University of Pakistan Sialkot in the year 2011, therefore the appellant is entitle to be reinstated into her service with all back benefits, and the impugned office order is liable to be set aside.

5

- D. That Respondents while issuing the impugned withdrawal order of the appellant has referred a letter of HEC in the impugned order but no detail has been provided regarding the university from where the appellant has obtained her bachelor degree. and without any solid or authentic evidence illegally declared the degree of the appellant to be issued by unrecognized university, and the appointment order of appellant has been withdrawal which is totally illegal and is not supported by any provision of law, therefore is liable to be set aside.
- E. That the appellant was rightly appointed after due process of law & procedure, and properly obtained the bachelor degree in the year 2011 from the Islamic university of Pakistan Sialkot, moreover at the time of obtaining degree from the university by the appellant, there was no such allegation on the affiliation of the university with Higher Education Commission as now alleged by the Respondent, therefore at this stage when the appellant has been gone through the long process of recruitment, and now cancelling the appointment order of appellant on such flimsy ground is illegal, unwarranted & unjustified and is liable to be set aside.
- F. That before issuing the impugned office order no notice has been given to the appellant, no inquiry has been conducted nor the required procedure provided under the law has been followed, nor the Respondents has provided any opportunity of hearing before the issuance of withdrawal order of appellant, which amount to condemned unheard the appellant and is against natural justice & fair play.
- G. That the Respondent while issuing the impugned order has not only violated the law but also infringed the constitutional rights provided under Article 4, 10A & 25 of the Constitution of Islamic Republic of Pakistan 1973.

- ⑥
- H. That the Appellant is will qualified and had obtained the service through proper procedure duly constituting selection committee, therefore without adopting the proper procedure of inquiry in the matter, and the withdrawal / cancelling of appointment order of appellant service is illegal, and unjustified.
- J. That the Appellant seeks the permission of this Honorable Tribunal to rely on additional grounds at the time of hearing of this petition.

Prayer


It is therefore most humbly prayed that on acceptance of this Service Appeal on behalf of Appellant, the impugned office order Endst No 416-28 dated 22/01/2022 whereby the appointment order of Appellant has been withdrawn / cancelled be declared illegal against the service rules and is liable to be set-aside and the Appellant be reinstated to her service along with back benefits.

Any other remedy which this August Tribunal deems fit and appropriate may also be granted to the Appellant.

Appellant:-Chaman Sultan

Through


Muhammad Irshad Mohmand
Advocate High Court


& Farhan Sheikh
Advocate

(7)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No:

/2022

Chaman Sultan

(Appellant)

VERSUS

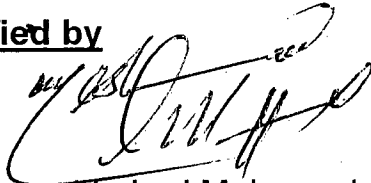
Govt of KPK, through Secretary E & SE Department Peshawar and
Others **(Respondents)**

AFFIDAVIT

I Chaman Sultan w/o Saud Nawaz R / o Quom Utmankhel, Tappa
Abba Khel Tehsil Abba Khel Lower, District Orakzai do hereby
solemnly affirm and declare that all the contents of the accompanied
Service Appeal are true and correct to the best of my knowledge and
belief and nothing has been concealed or withheld from this
Honorable Tribunal


DEPONENT

Identified by



Muhammad Irshad Mohmand
Advocate High Court
Peshawar

8

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No:

/2022

Chaman Sultan

(Appellant)

VERSUS

Govt of KPK, through Secretary E & SE Department Peshawar and
Others

(Respondents)

ADDRESSES OF PARTIES

Chaman Sultan w/o Saud Nawaz R / o Quom Utmankhel,
Tappa Abba Khel Tehsil Abba Khel Lower, District Orakzai

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department, Peshawar
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. District Education Officer (DEO) District Orakzai
4. Higher Education Commission through its Chairman, Sector H-9 Islamabad.

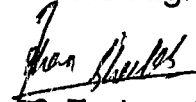
(Respondents)

چومان سلطان

**Appellant:-Chaman Sultan
Through**



Muhammad Irshad Mohmand
Advocate High Court



& Farhan Sheikh
Advocate

9

Annex

"A"

S.No.KB 20353Roll No. 51574

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



KOHAT

(N.W.F.P. Pakistan)

Secondary School Certificate Examination


SESSION 2003 (Annual)

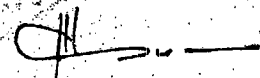
THIS IS TO CERTIFY THAT CHAMAN SULTAN
 Son/Daughter of SAYED ZARIN KHAN and a
 student of ORAKZAI AGENCY has passed
 the *Secondary School Certificate Examination* of the Board of Intermediate and
 Secondary Education, Kohat held in MARCH, 2003 as a PRIVATE
 candidate. He/She obtained 401 Marks out of 850 and has been placed in
 Grade D Representing Fair

The Candidate passed in the following subjects:

- | | | | |
|----------------|--------------------|--------------|-----------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak. Studies |
| 5. Mathematics | 6. <u>Gen. Sc.</u> | 7. <u>IS</u> | 8. <u>ART</u> |

Date of birth according to admission form is 03-Mar-1984


 Asstt. Secretary


 Secretary

This certificate is issued without alteration or erasure.

S.No. KB

32346

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 39586

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

KOHAT
(N.W.F.P. Pakistan)
INTERMEDIATE EXAMINATION



HUMANITIES GROUP
Session 2008 (ANNUAL)

This is to Certify that Chaman Sultan

Son/Daughter of Sayed Zarin Khan

and a student of Orakzai Agency

Registered No. 695-BK/P-2007 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Kohat held in May, 2008 as a Private candidate. He/She obtained 573 marks out of 1100 and has been placed in C Grade Representing Good.

The Examination was taken as a whole / in parts.

[Signature]
Asstt. Secretary

[Signature]
Secretary

Serial No: 1365480

Registration No: 7467-E-2009

Roll No: 60427

Islamic University Of Pakistan
Sialkot



جامعة الإسلامية باكستان
سيالكوت

Certified that CHAMAN SULTAN
Son/ Daughter of SYED ZARIN KHAN
Institute / District IUP SIALKOT
has obtained the Degree of BACHELOR OF ARTS

نشہد بان چمن سلطان
بن / نیت سید زرین خان
من طلب الجامعہ الاسلامیہ پاکستانیہ سیالکوٹ
قد حصل / حصلت علی بکالوریوس فنون

In this University at the Examination held in APRIL, 2011
securing 670/800 marks and was placed in the A Grade / Division
The Examination was taken as a whole / in parts

فی العلوم الاسلامیہ والعربیہ
بعد اجتياز الامتحان المنعقد باشراف الجامعة الإسلامية باكستانية

فی ۲۰۱۱ بتقدير ممتاز وعده درجاتها ۶۷۰/۸۰۰

Issue Date: JULY, 2013

Chancellor چانسلر

Controller Of Examinations
کنٹرولر امتحانات

(12)

Islamic University Of Pakistan

Roll Number: **60427**

Result : **Pass**



Regd Number: **7467-E-2009**

PROVISIONAL RESULT INTIMATION

Bachelor of Arts Annual Par I/II Examination, 2011

Name : **CHAMAN SULTAN**

Father's Name : **SYED ZARIN KHAN**

Institution/District : **Islamic University of Pakistan Sialkot, Campus**



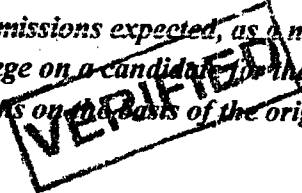
He/She has secured the marks as detailed below against subjects.

Sr. No.	Subjects	Total Marks	Part-I	Part-II	Total	Status	
						I	II
1	English	200	89	90	179	PASS	PASS
2	Islamic Education	50	40		40	PASS	
3	Pak Studies	50		43	43		PASS
4	Punjabi	200	76	85	161	PASS	PASS
5	Education	200	81	87	168	PASS	PASS
6	Arabic	100		79	79		PASS
Total		800			670	Grade: "A"	

The Candidate has passed and Obtained Marks **Six Hundred & Sevevty**

Disclaimer:

This card is issued provisionally, error and omissions expected, as a notice only Any entry appearing in this card does not itself 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.



Prepared By:

Checked By:

Date: **05 November, 2011**



Controller of Examinations

TRIBAL DOMICILE CERTIFICATE (13)

ORAKZAI AGENCY

(Prescribed vide Commissioner Peshawar Division, memo: No. 20611-23/CP/12/1316/TA. dated 3.11.1960 read with memo: No. 9704/13 FR, dated 10.7.1969)

Certified that Mr/Mrs [Handwritten Name] son/daughter of [Handwritten Name] belongs to a recognised tribe of ORAKZAI Section [Handwritten] Sub-Section [Handwritten] residence/Village [Handwritten] and his/her father is/are a Permanent bonafide resident of the Tribal Area of ORAKZAI AGENCY and he/she is an eligible candidate to avail himself/herself of the seats reserved for the SPEACIALAREAS of KOHAT DIVISION (ORAKZAI AGENCY).

POLITICAL TEHSILDAR/ NAIBTEHSILDAR [Handwritten Signature]

ASSISTANT POLITICAL AGENT [Handwritten Signature] ORAKZAI AGENCY Lower Orakzai

COUNTERSIGNED POLITICAL AGENT, ORAKZAI AGENCY



No. 1305 PAO'

Dated 21-3-1993

بیون ملکاتان... ۱۔ سک محمد رفیع ولد سک حاجی نور محمد خان گاڈن ربا خیل شہ فقہ خان قبیل قوم عثمان خیل اور کوری

۲۔ رحمت اللہ... مجال خان... " " " " " "

۳۔ ارمان اللہ خان... نور محمد خان... " " " " " "

۴۔ ملوک خان... سرور خان... " " " " " "

۵۔ لعل درخان... " " " " " "

۶۔ دریا خان... سمل خان... " " " " " "

(۱۶)

بارہ قرص مع مشرکہ طور میں کیا۔ کہ احاطہ چمن سلطان ڈھتر میرزا زین گاڈن ربا خیل شہ فقہ خان قبیل قوم عثمان خیل اور کوری اور جنسی کو ہم ذاتی طور پر جانتی ہیں۔ ساٹھ گاڈ اور قوم کیساتھ لفظ واقعات میں برابر کا شریک ہے۔ ہمہ در صورت ہے۔ اپنا ہم مورث بہتہ سک حاجی محمد رفیع و سمل کرتا ہے۔ جہاں ربا خیل ساٹھ کے والد

راہ نشینی مکان شریعی اررا ہے۔ ایک کوری ہے۔ غلط بیان کی صورت میں ہم گروہ خود سے فی فی سبب ہیچاں ہزار روپے جرمانہ ادا کرینگے فقط

سک محمد رفیع تسلیم کیا۔
ATTESTED.

[Handwritten signature]

سک رحمت اللہ قوم عثمان خیل

147-89-061936

محمد رفیع

سک محمد رفیع ولد سک حاجی نور محمد خان قبیل قوم عثمان خیل

147-45-034926

سک محمد رفیع

ملوک خان

سک ملوک خان قوم عثمان خیل

147-89-049867

ارمان اللہ

سک ارمان اللہ خان قوم عثمان خیل

147-49-001197

سک دریا خان قوم عثمان خیل

147-51-006682

لعل درخان

سک لعل درخان قوم عثمان خیل

147-54-016216

اشتہار برائے نوکری

محکمہ تعلیم و تربیت کے زیر نگرانی کے ذریعہ انتظام (2020-21) میں نوکریوں کی فراہمی کے لئے شیخ اہل انیس اڈوں کے سبکی ڈال امیدواروں سے تعلق رکھنے والے امیدواروں کو 07/12/2020 تک درخواستیں طلب ہیں درخواست فارم ETEA کی ویب سائٹ (<http://www.etaa.edu.pk>) پر دستیاب ہے۔ مقررہ تاریخ گزرنے کے بعد وصولی ہو سکتی ہے اور درخواستیں مانی جانے والی درخواست اور حاصل کرنا شروع کیا جائے گا۔ اور یہی امکان شروع کیا جائے گا۔

35x19 سال	(i) کسی بھی تعلیم شدہ و پروفیشنل سے بطور (ii) سیکشن اور تقرری کے دوران کی لازمی فریڈنگ سوتھی اداروں RITE/PITE/GCET/FITE سے حاصل کرنی ہوگی۔	پہلی (BPS-15)	1
35x19 سال	(i) کسی بھی تعلیم شدہ و پروفیشنل سے بطور (ii) سیکشن اور تقرری کے دوران کی لازمی فریڈنگ سوتھی اداروں RITE/PITE/GCET/FITE سے حاصل کرنی ہوگی۔	دوئی (BPS-15) (مرواٹ 27)	2
35x19 سال	(i) کسی بھی تعلیم شدہ و پروفیشنل سے بطور (ii) سیکشن اور تقرری کے دوران کی لازمی فریڈنگ سوتھی اداروں RITE/PITE/GCET/FITE سے حاصل کرنی ہوگی۔	تینئی (BPS-15) (مرواٹ 27)	3
35x19 سال	(i) کسی بھی تعلیم شدہ و پروفیشنل سے بطور (ii) سیکشن اور تقرری کے دوران کی لازمی فریڈنگ سوتھی اداروں RITE/PITE/GCET/FITE سے حاصل کرنی ہوگی۔	چارئی (BPS-15) (مرواٹ 27)	4
35x19 سال	(i) کسی بھی تعلیم شدہ و پروفیشنل سے بطور (ii) سیکشن اور تقرری کے دوران کی لازمی فریڈنگ سوتھی اداروں RITE/PITE/GCET/FITE سے حاصل کرنی ہوگی۔	پنچئی (BPS-12) (مرواٹ 27)	5
35x19 سال	(i) کسی بھی تعلیم شدہ و پروفیشنل سے بطور (ii) سیکشن اور تقرری کے دوران کی لازمی فریڈنگ سوتھی اداروں RITE/PITE/GCET/FITE سے حاصل کرنی ہوگی۔	چھئی (BPS-12 (PST)) (مرواٹ 27)	6

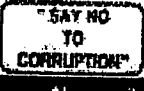
سلیکشن کو خطوط اور ہالڈنگ کے ذریعے کی جائے گی۔ ہر وارنٹ میں ہے کہ 200 نوکریوں کی صورت میں ہر وارنٹ سے کی جائے گی۔ (ب) (تعمیلی ڈیوٹی = 100 نوکریوں کی صورت میں ہر وارنٹ سے کی جائے گی۔)

تعمیلی ڈیوٹی	نوکری
100	مائل کروہ نمبر 20x سیکشن نمبر
100	مائل کروہ نمبر 20x سیکشن نمبر
100	مائل کروہ نمبر 20x سیکشن نمبر
100	مائل کروہ نمبر 20x سیکشن نمبر
100	مائل کروہ نمبر 05x سیکشن نمبر
100	مائل کروہ نمبر 05x سیکشن نمبر
100	مائل کروہ نمبر 05x سیکشن نمبر
100	مائل کروہ نمبر 05x سیکشن نمبر

لی ایئر چار سالہ نوکری کی صورت میں ہر وارنٹ سے کی جائے گی۔ مائل کروہ نمبر 40x سیکشن نمبر کے لئے ہر وارنٹ سے کی جائے گی۔ ایک ایسے امیدوار کو مائل کروہ نمبر 10x تعلیم کی ہے۔ (5) ہر وارنٹ سے 15 امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (6) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (7) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (8) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (9) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (10) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (11) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (12) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (13) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (14) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (15) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (16) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (17) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (18) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔

مستحق امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (1) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (2) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (3) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (4) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (5) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (6) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (7) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (8) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (9) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (10) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (11) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (12) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (13) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (14) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (15) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (16) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (17) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (18) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (19) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔ (20) ایسے امیدواروں کے لئے ہر وارنٹ سے کی جائے گی۔

فرید اللہ، ڈسٹرکٹ ایجوکیشن آفیسر (مرواٹ 27) حکمہ تعلیم و تربیت، ایجوکیشن ٹھکانہ، علاقہ جات، شیخ اہل انیس اور کٹرئی۔



Enter your Roll No here.

Search

(16)

Annex "C"

Result Date: 25/Jun/2021

Roll No 223038

Name CHAMAN SULTAN

Father Name SYED ZARIN KHAN

Post CT (BPS-15)

Domicile ORAKZAI

MARKS/ 100 40

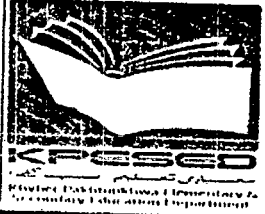
Result Date Jun-24-2021

Errors and Omissions are accepted with-in 05 days of the declaration of Result

Close


OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Hangu.
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzai2020@gmail.com



17

OFFICER ORDER.

Consequent upon approval given by the competent authority and recommendation of the Departmental Selection Committee (DSC) meeting held on 30-10-2021, appointment of the following candidates is hereby ordered against the vacant posts/newly created posts of **Certified Teacher (CT) in BPS: 15 (Rs. 16120-1330-56020) @ Rs. 16120/-** fixed plus usual allowances as admissible under the rules on adhoc basis on contract in E&SED Orakzai under the existing policy of the Provincial Government, in teaching cadre on the terms and conditions given below with effect from the date of their taking over charge:

S#	ETEA ROLL NO.	NAME	FATHER/HUSBAND NAME	DOB	CNIC	MERIT	SCHOOL NAME	REMARKS
1.	223558	SAMIA KHAN	MEHBOOB KHAN	17/02/1998	1430108272464	113.30	GGMS Chuntra	Against N/C Post
2.	233607	SADIA BIBI	MUHAMMAD YUNAS	18/11/1995	2160362912046	110.35	GGMS Toor Khawri	Against N/C Post
3.	223449	ZULAIKHA BIBI	AHMAD KHAN	08/05/1995	2160348551088	106.80	GGMS Kar Mela	Against N/C Post
4.	223521	KARISHMA KHATOON	ZERAB ALI	24/03/1997	1430145352234	100.48	GGMS Landaghar	Against N/C Post
5.	223579	NAHEEDA ISHAQ	MUHAMMAD ISHAQ	12/11/1998	2160345061062	99.93	GGMS Ster Bezot	Against N/C Post
6.	223561	MARYAM	MAQSAD ALI	10/03/1998	1430199713592	95.55	GGMS Khadizai	A.V.P
7.	234096	SAMREEN ALAM	ALAM ZEB	02/08/1998	1610204934904	94.44	GGMS Farid Khan Mela	Against N/C Post
8.	223444	QURAT UL AIN	SHAUKAT ULLAH	11/04/1995	1410137843298	93.87	GGMS Kot Ali Khel	Against N/C Post
9.	223564	NOSHEEN SAIRAB	SAIRAB ALI	27/03/1998	2160331089890	93.56	GGMS Penzari	Against N/C Post
10.	223584	NOORIN SIHRAB	SIHRAB ALI	15/01/1999	2160317927320	93.36	GGMS Ain Posh	A.V.P
11.	223089	SOFIA JEHAN	MUHAMMAD ISHAQ	10/02/1987	2160345900086	90.57	GGMS Goeen	Against N/C Post
12.	223587	NOSHEEN BEGUM	MUHAMMAD ZAKI	17/02/1999	1430117425296	87.04	GGMS Ain Posh	A.V.P

18

13.	223476	BIBI KHADIJA	RUSTAM KHAN	03/02/1996	2160408749872	82.99	GGMHSS Ghiljo	A.V.P
14.	223001	RIZWANA KHATOON	ISMAIL	12/05/1985	7150196981058	82.65	GGMS Sharo Dogula	Against N/C Post
15.	223199	MEHNAZ	MUHAMMAD ALAM	10/01/1990	1430186696632	82.35	GGMS Khando	Against N/C Post
16.	223398	SHABNUM MIRAJ	SAID MIRAJ	07/05/1994	2160351465434	78.47	GGMS Ster Bezot	Against N/C Post
17.	223091	SHOMAL BEGUM	MUHAMMAD ALI	10/02/1987	2160330507926	78.43	GGMS Kalaya	Against N/C Post
18.	223543	TANZEELA	FARID KHAN	20/11/1997	2160374955262	78.05	GGMS Chuntra	Against N/C Post
19.	223038	CHAMAN SULTAN	SAYED ZARIN KHAN	03/03/1984	2160388204354	76.60	GGMS Kala Panra	Against N/C Post
20.	223277	BOSHRA SHAHEEN	LIAQAT ALI	08/01/1992	2160312632502	75.68	GGMS Zera Navi Wajid Ali Killi	Against N/C Post
21.	223593	NOOR AINAZ	IKHTIAR ALI	10/03/1999	2160188816202	74.51	GGHS Ahmed Khel	A.V.P
22.	223424	SAKINA HALIM	HALIM KHAN	22/12/1994	1430130364112	74.00	GGMS Ghundaki	Against N/C Post
23.	223062	UZRA KHATOON	NAZAR ALI	15/12/1985	2160390939896	72.34	GGMS Nadir Garhi	Against N/C Post
24.	223390	NARJIS KHATOON	JAWAD ALI	08/04/1994	1430112061662	71.84	GGMS Landaghar	Against N/C Post
25.	234043	BIBI QURAT UL AIN SHERAZI	SYED MUHAMMAD ALIAIN SHERAZI	19/03/1998	6110180911912	71.26	GGMS Sara Khuna	Against N/C Post

TERMS & CONDITIONS:

1. No. TA/DA is allowed for joining his/her duty.
2. Charge assumption report should be submitted to all concerned.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. They should not be handed over charge if they exceed 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned boards/universities/authorities by the District Education Officer (M/F) office, anyone found producing bogus certificate will be reported to the law enforcing agencies for further action and their services shall be terminated accordingly.

(19)

- Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
7. Their pay will be released subject to verification of their documents/testimonials from the concerned boards/universities/authorities by the District Education Officer concerned.
 8. They should join their post within 15 days of the issuance of this notification/office order. In case of failure to join the post within stipulated period, their appointments will stand expired automatically and no subsequent appeal etc. shall be entertained.
 9. Health & Age Certificate should be produced from the Medical Superintendent DHQ Hospital Orakzai before taking over charge to the DDO concerned and the same date of birth shall be reckoned till retirement.
 10. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
 11. Their services shall be terminated at any time, In case their performance is found unsatisfactory during contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
 12. Their appointment is made on school based, they will have to serve at the place of posting, and their service is not transferrable to any other station.
 13. Before handing over charge, once again their document may be checked by the DDO concerned also, if they do not have the required relevant qualification as per rules, they may not be handed over charge of the post.
 14. In case of miscalculation of their marks affecting merit at any stage will be rectified accordingly which may affect the place of posting and even appointment resultantly.
 15. In case one/more than one appointee does not take their charge of his/her post (for any reason) the next on merit shall be appointed and the previous placement may be shuffled/readjusted accordingly.
 16. They will have to complete nine month's service mandatory professional training successfully, failing which their services shall be terminated accordingly.
 17. In case of any discrepancy in documents, oversight or clerical mistake, the competent authority has the right to modify or withdrawn appointment order of a candidate according to rules/policy.
 18. Posting/adjustment on the advertised/available vacancies is the discretionary powers of the appointing authority and no one has the right to claim for adjustment at a specific school.
 19. The competent authority reserved the right of corrigendum if needed.
 20. Errors & omissions will be acceptable within the specified period


DISTRICT EDUCATION OFFICER,
ORAKZAI

Endst: No. 9378-90.....CT-Female/ETEA/2020-21

Dated: 04/11/2021

Copy forwarded for information and necessary action to the:-

- 1) PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department, Civil Secretariat Peshawar.
- 2) PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 3) PA to Additional Director (Estab), Directorate of Education, E&SE, Merged Areas, Peshawar.
- 4) PA to Deputy Commissioner Orakzai.
- 5) Section Officer (PE), Civil Secretariat, Khyber Pakhtunkhwa E&SE Department Peshawar.
- 6) District Accounts Officer, Orakzai.
- 7) Deputy DEO (M/F), local office.
- 8) Principal/Head Master/Head Mistress/Head Teacher concerned.
- 9) District Monitoring Officer, (EMA), Orakzai.
- 10) Superintendent, local office.
- 11) Assistant Programmer/CO, HRMIS Cell local office.
- 12) Accountant/Pay Clerk local office.
- 13) Teacher concerned.


DISTRICT EDUCATION OFFICER,
ORAKZAI

Page 3 of 3

Annex "E"

CHARGE REPORT

(20)

Consequent Upon the District Education Officer District Orakzai
Appointment order vide Endst No 9378-90 Date 4/11/2021 I, Chaman Sultani
D/o Syed Zahir Khan took over the charge of his duty on vacant post CT post
at CGMS Kala Panja District Orakzai today on 5/11/2021 (A/N, B/N)

Chaman Sultani
1. Signature of charge handed over

Syed Zahir Khan
2. Signature of charge taken over

Endst No. 9378-90 / Date the 4/11/2021.

Copy for information to the

1. District Education Office District Orakzai.
2. District Account Office District Orakzai.
3. Office Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER-ORAKZAI

Umar Plaza, Main Kohat Road, Muslimabad-Fangu.
Phone # 0925-690017 Fax # 0925-690017
Email: daeorakzai2020@gmail.com



OFFICE ORDER:

Annex "F"

(21)

In light of this office letter to the Higher Education Commission (HEC) Islamabad bearing No. 110 dated 11/01/2022 regarding recognition & affiliation of Islamic University of Pakistan Sialkot & subsequent list of Fake, Illegal, Unlawful and Unrecognized Institutions in Punjab at serial No. 96 on HEC URL: <https://www.hec.gov.pk/english/universities/Pages/AJK/illegal-DAIs.aspx>.

Apropos, the undersigned is pleased to hereby withdrawn/cancelled the appointment orders of the following newly ETEA appointees for the year 2020-21 for possessing BA degrees from fake, illegal, unlawful & unrecognized institutions i.e Islamic University of Pakistan Sialkot, Punjab

Order No	ETEA ROLL NO.	NAME	FATHER/HUSBAND NAME	DOB	CNIC	MERIT	POST & SCHOOL NAME	REMARKS
	257035	CHAMAN SULTAN	SAYED ZARIN KHAN	03/03/1984	2160388204354	76.60	CT BPS: 15 at GGMS Kala Panra	Officer order bearing Endst: No. 9378 90 dated 04/11/2021 hence the appointment order to her extent at S. No. 19 is withdrawn with effect from the date of its issuance.
03	31094	FOZIA GUL	GULA KHAN	17/02/1999	2160384178582	92.19	AT BPS: 15 at GGMS Tooti Bagh	Officer order bearing Endst: No. 9391-403, dated 01/11/2021, hence the appointment order to her extent at S. No. 03 is withdrawn with effect from the date of its issuance.

DISTRICT EDUCATION OFFICER,
ORAKZAI

Endst. No. 416-28,

Dated: 22/01/2022

Copy forwarded for information and necessary action to the:-

1. PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department, Civil Secretariat Peshawar.
2. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar with a request to communicate the culprits with ETEA for future reference.
3. PA to Additional Director (Estab), Directorate of Education, E&SE, Merged Areas, Peshawar

خدمت جناب ڈائریکٹ ایجوکیشن آفیسر اور کزن

Annex "6"

درخواست بھرا منسوخ کرنے آفیس آرڈر نمبر 28-416 مورخہ 22/01/2022

23

جناب عالی! سائلہ حسب ذیل عرض رساں ہے۔

من سائلہ آپ صاحبان سے گزارش کرتی ہوں کہ من سائلہ نے آپ جناب

کے آفس میں آ.ت. پوسٹ کے لیے مائنزات جمع کرائے تھے اور

ایٹا ٹیسٹ و انٹرویو وغیرہ پاس کرنے کے بعد من سائلہ کو مورخہ 11/04/2022

کو آپ صاحبان نے آفس میں بھرتی پوری اور تقریباً تین ماہ اپنی

ڈیوٹی بھی کی ہے۔

لیکن من سائلہ کو بغیر سینے ہنر بعد آفس آرڈر مورخہ 22/01/2022

کو نوکری سے نکالا ہے۔

لہذا من سائلہ ایک غیرت خاندان سے تعلق رکھتی ہے اور سائلہ

کا بھرتی کا آرڈر بغیر کسی قانونی جواز کے منسوخ کیا گیا ہے۔

لہذا آپ صاحبان سے گزارش کی جاتی ہے

کہ سائلہ کو نوکری سرورس بحال کیا

جائے۔

سائلہ دھن سلطان

سابقہ C.T. شیگر

50	19534			
ایڈویکٹ: <i>Mr. Asim</i>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <i>be-12-3483</i>		بعدالت جناب: <i>سر جسٹس ایچ بی بی خان</i>		
رابطہ نمبر: <i>0300-5917744</i>				

منجانب: <i>مسائلہ</i>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
باعت تحریر آگے	

کچھ کاغذ لایا
 جج صاحبان

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام *کے ایچ ایم ایچ* کیلئے *محمد اسحاق مسند*، *حسان مسند* اور *سید اسحاق مسند* کو
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کے لئے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ دو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختر منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم: *28/03/2022*

مقام *کے ایچ ایم ایچ* کے لیے منظور ہے۔
 نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. S.B

No.

APPEAL No. 788 of 20 22

Chaman Sultan

Appellant/Petitioner

Versus

Govt. CF KPK Through Secy. ERSE

RESPONDENT(S)

Respondent No. 1

Notice to Appellant/Petitioner

Govt. CF KPK Through Secy.

ERSE Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 26/7/2022 at 9:00 am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

copy of Appeal is attached

for Reply

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.