

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

**Service Appeal No. 7453/2020**

**BEFORE:** SALAH UD DIN --- MEMBER(J)  
MIAN MUHAMMAD --- MEMBER(E)

**Mst. Hena Begum D/o Abdur Rauf W/O Abdul Wahid R/o Village  
Mangai, Tehsil Balambat, District Dir Lower**  
..... (Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa; through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar
  2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar
  3. District Education Officer (Female), Dir Lower at Timergara.
- ..... (Respondents)

**Present:**

SARDAR WAQAR SHEHZAD,  
Advocate --- For Appellant.

MUHAMMAD RIAZ KHAN PAINDAKHEL,  
Assistant Advocate General --- For respondents.

Date of Institution.....27.01.2020  
Date of Hearing.....09.09.2022  
Date of Decision .....15.09.2022

**JUDGEMENT.**

**MIAN MUHAMMAD, MEMBER(E):-** The service appeal has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 with the prayer that “on acceptance of the service appeal the official respondents be directed to reinstate the appellant with all back benefits and allow the transfer application of the appellant.”

02. Brief facts, as per memorandum of appeal, are that the appellant was appointed as Drawing Master (BS-15) in the respondent department on 01.11.2014 and was posted at Government Girls

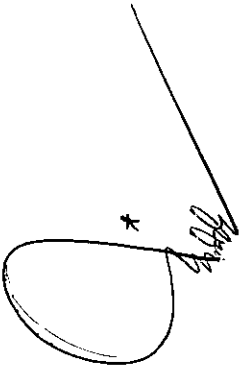
Middle School, Gall, Maidan Dir Lower. The appellant was allegedly unable to continue her services in GGMS, Gall, Maidan, Dir Lower due to security threats, therefore, she submitted an application on 07.11.2014 to respondent No. 3 with the request for transfer from the said school to any other school. The application was however, not responded by respondent No. 3. Her appointment order dated 01.11.2014 was recalled on 09.05.2015. The appellant has submitted the instant service appeal for redrassal of her grievance in Service Tribunal on 27.01.2020.

03. On admission of the service appeal in preliminary hearing on 24.08.2021, the respondents were put on notice to submit written defence through reply/para-wise comments. Reply/Parawise comments were submitted on 07.06.2022. We have heard learned counsel for the appellant as well as learned Assistant Advocate General for the respondents and gone through the record with their assistance.

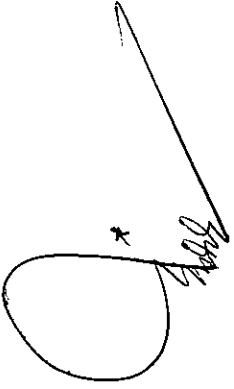
04. Learned counsel for the appellant argued that while serving in Government Girls Middle School Gall Maidan, the appellant received life threats, therefore, she filed application for her transfer to some other school but her application was not responded. The absence of appellant was not intentional rather the same was due to threats to her life. He contended that the impugned termination order was never communicated to the appellant and the same was passed at the back of appellant without affording her any opportunity of self defense and personal hearing. Moreover, that the appellant has not been treated in accordance with law and rules, which is against the fundamental rights

of appellant as enshrined in Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973. The services of other colleagues appointed with the appellant have been regularized in 2018 but she has been ignored which is discrimination with the appellant. The appellant is the sole bread earner of her family, therefore, respondents may be directed to re-instate the appellant into service with all back benefits and allow the transfer application of the appellant, he concluded.

05. Learned Assistant Advocate General conversely contended that the appellant was appointed as Drawing Master (BS-15) vide order dated 01.11.2014 on adhoc basis for a period of one year, therefore, the appeal of appellant is not maintainable under Section 4 of the Khyber Pakhtukhwa Service Tribunal Act, 1974 and which is liable to be dismissed on this score alone. He further argued that after her appointment, she did not perform any duty and remained willfully absent from duty, therefore, vide impugned order dated 09.05.2015 her appointment order was rightly withdrawn. The appellant has neither brought the matter of her life threats to the notice of competent authority with any evidence nor she has filed any application for her transfer to any other school. The impugned order was passed on 09.05.2015, therefore, the appellant was required to have filed departmental appeal within 30 days which she filed on 23.09.2019 and the same is badly time barred. He further argued that the appellant has not filed any application for condonation of delay, therefore, the appeal in hand is liable to be dismissed with cost, he concluded his arguments.

A handwritten signature and initials are present on the left side of the page. The signature is written in black ink and appears to be 'A. A. G.' with a star symbol above the first letter. The initials are written below the signature.

06. On careful perusal of the record, it transpires that the appellant was appointed alongwith 40 others as Drawing Master (Female) (School Based) on fixed pay on adhoc/contract basis vide office order dated 01.11.2014. Serial No. 7 of the terms & conditions of appointment specifically mentioned that appointment will be school based, to serve at the place of posting and the service is not transferable to any other station. The terms and conditions of appointment were accepted by the appellant when she submitted her arrival report in GGMS Gall Maidan District Dir Lower and assumed the charge on 01.11.2014 and within a short span of one week, she submitted an application to respondent No. 3 on 07.11.2014 for transfer on personal/domestic reasons. Thereafter, her absence (18.11.2014 to 09.12.2014) was reported by the school Head Mistress to respondent No.3 on 09.12.2014 in pursuance of which her appointment order dated 01.11.2014 was withdrawn vide impugned order dated 09.05.2015. The claim of appellant that she had not been communicated the impugned order due to which she could not file departmental appeal in time, is self contradictory on the ground that copy of the impugned order was duly endorsed to "the official concerned" based on which she submitted several applications to respondent No. 3 with title/Heading (in urdu) for reinstatement into service, on 21.05.2015, 07.04.2016, 13.03.2017 and 19.09.2018. So far the question of regularization of her 40 other colleagues is concerned, their contract services were used to be extended on yearly basis and ultimately regularized after 03 years vide Notification dated 13.03.2018 when she was admittedly no longer in service since her

A handwritten signature and initials in black ink, located on the left side of the page. The signature consists of a large, stylized letter 'D' with a small star-like mark above it, followed by a series of vertical lines and a long, thin diagonal stroke extending upwards and to the right.

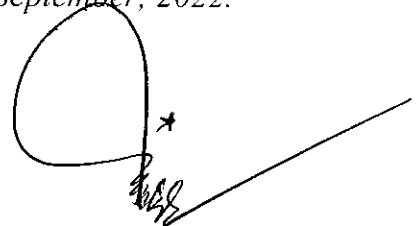
appointment order owing to her absence had been withdrawn on 09.05.2015.

07. As a sequel to the above, the appeal in hand stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

08. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 15<sup>th</sup> day of September, 2022.*



(SALAH UD DIN)  
MEMBER (J)



(MIAN MUHAMMAD)  
MEMBER (E)

**ORDER**

15.09.2022

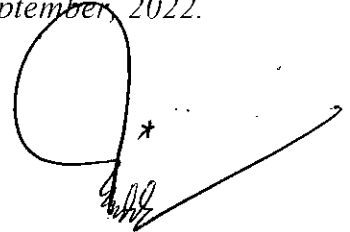
Mr. Sardar Waqar Shehzad, Advocate for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

02. Vide our detailed judgement of today separately placed on file containing (05) pages, the appeal in hand stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

03. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 15<sup>th</sup> day of September, 2022.*



(SALAH UD DIN)  
MEMBER (E)




(MIAN MUHAMMAD)  
MEMBER (J)

05.07.2022

Learned counsel for appellant present.

Noor Zaman Khattak, learned District Attorney for respondents present.

Former made a request for adjournment in order to prepare the brief of the case; granted. To come up for arguments on 04.08.2022 before D.B at Camp Court, Swat.



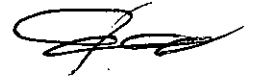
(Fareeha Paul)  
Member (E)  
Camp Court, Swat



(Rozina Rehman)  
Member (J)  
Camp Court, Swat

4.8.22

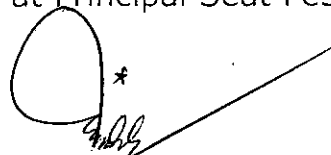
*Due to summer vacation the case is adjourned to 9.9.22 for the same.*



09.09.2022

Learned counsel for the appellant present. Mr. Muhammad Usman, ADEO (Litigation) alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Arguments heard, however order could not be announced due to rush of work. Adjourned. To come up for order on 15.09.2022 at Principal Seat Peshawar.



(Mian Muhammad)  
Member (Executive)  
Camp Court Swat



(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat

13.05.2022

Clerk of learned counsel for the appellant present. Ms. Asmat Ara, DEO (Female) alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and sought further time for submission of written reply/comments. Respondents are directed to submit written reply/comments on the next date positively, failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for submission of written reply/comments on 07.06.2022 before the S.B at Camp Court Swat.



(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

7<sup>th</sup> June, 2022

Mr. Abdul Wahab, husband of the appellant on behalf of the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Muhammad Usman, ADEO for respondent present.

Representative of the respondents has submitted written reply/comments alongwith cost of Rs. 2000/-. A copy of written reply/comments is handed over to the husband of the appellant. To come up for arguments on 05.07.2022 before the S.B at camp court Swat.



(Kalim Arshad Khan)  
Chairman  
Camp Court Swat



07.02.2022

Tour is hereby cancelled. Therefore, the case is adjourned to 04.04.2022 for the same as before at Camp Court Swat.


  
Reader

04.04.2022

Nemo for the appellant. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General present.

Previous date was changed on Reader Note, therefore, notices be issued to the respondents through registered post and to come up for submission of written reply/comments on 11.05.2022 before the S.B at Camp Court Swat.

Notice also be issued to the appellant/counsel for the appellant for the date fixed.



(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

11.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned Additional Advocate General shall contact the respondents to positively submit reply/comments on 13.05.2022 before the S.B at Camp Court Swat.

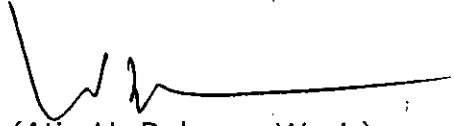


(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

06.12.2021


Mr. Abdul Wahid, Husband of the appellant present Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

Written reply/comments on behalf of respondents not submitted. Learned D.D.A is required to contact the respondents for submission of reply/comments. Last opportunity is granted. To come up for reply/comments on 03.01.2022 before S.B at Camp Court Swat.

  
(Atiq Ur Rehman Wazir)  
Member (E)  
Camp Court, Swat

03.01.2022

Learned counsel for the appellant present. Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents and again requested that time may be granted for submission of reply/comments. Adjourned. Last opportunity given subject to payment of cost of Rs. 2000/-. To come up for written reply/comments on 07.02.2022 before the S.B at Camp Court Swat.

  
(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

Mst Hina Begum

24.08.2021

Nemo for the appellant.

The appeal was preferred on 27.01.2020 and is still lying in the channel for preliminary hearing. If the appeal is dismissed in default and then an application is made for restoration, it will cause further delay and result into aging of the appeal. Therefore, it is deemed appropriate to admit the appeal for regular hearing in absence of appellant subject to all just and legal objections including that of limitation to be determined during the course of full hearing. However, appellant and his counsel be put on notice for deposit of security and process fee within 20 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 02.11.2021 before S.B at camp court, Swat.

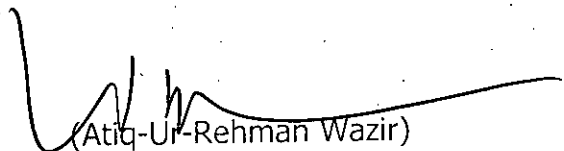
Appellant Deposited  
Security & Process Fee

  
Chairman  
Camp Court, Swat.

02.11.2021

Mr. Abdul Wahid, Husband of the appellant present. Mr. Riaz Khan Paindakheil, Assistant Advocate General for the respondents present.

Written reply/comments on behalf of respondents not submitted. Learned Assistant Advocate General is required to contact the respondents for submission of reply/comments. To come up for reply/comments before the S.B on 06.12.2021 at Camp Court Swat.

  
(Atiq-Ur-Rehman Wazir)  
Member (Executive)  
Camp Court, Swat

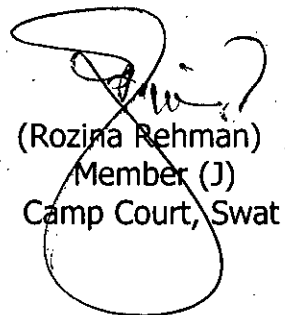
04.03.2021

Appellant present through counsel.

Noor Zaman Khan Khattak learned District Attorney is absent. Representative of respondents is also absent.

It was on 09.09.2020 when pre-admission notice was ordered to be served upon respondents with direction to submit termination order of the appellant, if any, but till today, nothing was produced in this regard. A notice be issued to all the respondents to comply with the directions on or before date. While copy of this order be sent to learned A.A.G as well.

Adjourned 5/5/2021 for production of relevant record and preliminary hearing, before S.B at Camp Court, Swat.

  
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

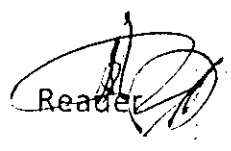
26.07.2021

To come up for preliminary hearing on 24.08.2021 before S.B at Camp Court, Swat. Notices be issued to appellant/counsel for the date fixed. Notices shall also be issued to respondents as well as learned AAG for production of requisite record on the date fixed.

  
Chairman

S-8- .2020


Due to COVID19, the case is adjourned to 9/9/2020 for the same as before.

  
Reader

09.09.2020

Counsel for appellant present.

As per office note, copy of impugned termination order has not been annexed with the appeal. Learned counsel for appellant submitted that despite repeated requests, copy was not provided by the concerned department. As such, pre-admission notice be served upon AAG and respondents with direction to submit termination order of the appellant, if any, on 05.11.2020. To come up for preliminary hearing and further proceedings on the date fixed before S.B at Camp Court, Swat.


  
Member (J)  
Camp Court, Swat

05.11.2020

Husband of appellant on behalf of appellant present.


Muhammad Jan learned Deputy District Attorney for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 07.01.2021 for preliminary hearing, before S.B at Camp Court, Swat.


  
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

7.1.2021

*Due to COVID 19, the case is adjourned to 4.3.2021 for the same.*



Due to corona virus tour  
to camp court swat has been cancelled.  
To come up for the same on  
04-06-20

  
Reader


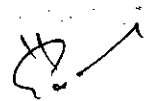
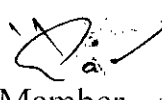
04.06.2020

Due to COVID-19, the case is adjourned. To come up  
for the same on 05.08.2020, at camp court Swat.

  
Reader

Form-A  
FORM OF ORDERSHEET

Court of \_\_\_\_\_  
Case No. \_\_\_\_\_/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	28/02/2020	<p>As per direction of the Leaned Member this case is submitted to the touring S. Bench at Swat on office objection. To be put up there on <u>3.3.2020</u></p> <p style="text-align: right;"> REGISTRAR 28/2/2020</p>
	03.03.2020	<p>Nemo for the appellant. Adjourn. To come up for preliminary hearing on 05.03.2020 before S.B at Camp Court, Swat.</p> <p style="text-align: right;"> Member Camp Court Swat</p>
	05.03.2020	<p>Appellant absent. Learned counsel for the appellant absent. Adjourned for 09.04.2020 before S.B at Camp Court, Swat. Notice be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;"> Member Camp Court, Swat.</p>

**BEFORE THE PUBLIC INFORMATION**  
**OFFICER/ADDITIONAL DEPUTY COMMISSIONER, DIR**  
**LOWER**

Subject: Right to Information (RTI) Application U/S 7 of Khyber Pakhtunkhwa  
Right to Information Act, 2013, Khyber Pakhtunkhwa for provision of  
attested copies of the required documents

Respected Sir,

As cited above, I Mst. Hina Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village Mangai, Tehsil Balambat, Distt: Dir Lower, and being a citizen of Islamic Republic of Pakistan and the rights conferred in the Khyber Pakhtunkhwa RTI Act 2013 to the citizens, I would please request to provide me with the attested copies of the following documents under section 7 of the ibid Act:

- 1) Termination Order (If any)
- 2) Any disciplinary proceedings taken against the applicant

Applicant



Hina Begum W/O Abdul Wahid

Cell No. 0348-8101321

(Ex-Drawing Master (DM)

GGMS, Galshegai, Maidan, Dir lower

Received

Reader 15 AD 27  
17/2/20  
Additional  
Deputy Commissioner  
Dir Lower




The appeal of Mst. Hena Begum D/O Abdur Rauf w/o Abdul Wahid r/o Village Mangai Tehsil Balambat District Dir Lower received today i.e. on 27.01.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ 1- Memorandum of appeal is unsigned which may be got signed by the appellant and her counsel.
- ✓ 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- ✓ 3- Copy impugned termination order mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- ✓ 4- Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- ✓ 5- Annexures of the appeal may be attested.
- ✓ 6- Affidavit may be got attested by the Oath Commissioner.
- ✓ 7- Annexures of the appeal may be flagged.
- ✓ 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal which may be placed on it.

No. 257 /S.T,

Dt. 27-01 /2020.

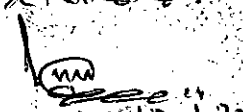
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Sardar Waqar Shahzad Adv.  
District Court Swat

OBJECTION/REMOVED


[2] CHARGE SHEET, STATEMENT OF ALLEGATIONS, SHOW CAUSE NOTICE, ENQUIRY REPORT AND REPLIES WERE ORAL AND NOT PROVIDED DOCUMENTATION

[3] TERMINATION ORDER NOT PROVIDED THROUGH DOCUMENTS, ORALLY GIVEN

[4] Application to RTI to provide Termination order attached dated: 17/02/2020  
Dated: 07/02/2020  
No 320-ST  
Dated 7-2/2020  
AFSHA NAZ  
(AHC)  
20 days time further extended  


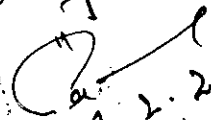
Sir

The objection No-3 of this office  
is still stand. The objection and reply  
of counsel from the appellant is sub-itted  
for order please.

  
28/2/2020

Hon'ble Member (J)

Put up before S.B

  
28.2.2020

1728

10-11

[5]

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

Service Appeal No. 12345 of 2020

Mst. Hena Begum

... **Appellant**

**VERSUS**

Government of KP and others.

... **Respondents**

**INDEX**

S #	Description of documents	Annexure	Pages
1.	Memorandum of service appeal	.....	1-5
2.	Certificate	.....	6
3.	Affidavit	.....	7
4.	Memo Of Addresses	.....	8
5.	Copies of CNIC and order dated 01.11.2014	A	9-12
6.	Copies of charge report dated 01.11.2014 and medical report	B	13-14
7.	Copy of transfer application dated 07.11.2014	C	15
8.	Copies of representations/appeals dated 21.05.2015, 07.04.2016, 13.03.2017, 19.09.2018 and 23.09.2019	D	16-20
9.	Wakalat Namas	.....	21

APPELLANT THROUGH  
Counsels

  
Sardar Waqar Shahzad  
Advocate High Court

Off: 2<sup>nd</sup> 8<sup>9</sup> Floor, Continental Plaza,  
Makanbagh, Mingora, District Swat.  
Cell No: 03339484842

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,****PESHAWAR**Khyber Pakhtunkhwa  
Service TribunalService Appeal No. 7453 of 2020Diary No. 831Dated 27-01-2020

Mst. Hena Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village  
Mangai, Tehsil Balambat, Distt: Dir Lower

... **Appellant****VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Female), Dir Lower at Timergara

... **Respondents**

Service Appeal Under Section 4 of Service Tribunal Act, 1974, against the actions and inactions of respondents whereby the appellant has been kept in a hanging position by not responding her cogent and plausible transfer application and terminating her services without any notification.

**Filed to-day****Registrar**

27/01/2020

**Prayer:****Re-submitted to -day  
and filed.****Registrar**

On acceptance of this service appeal, the official respondents may please be directed to re-instate the appellant with all back benefits and allow the transfer application of the appellant in accordance with law.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Respectfully Sheweth:

1. That appellant is the bonafide resident of Village Mangai, Tehsil Balambat, Distt: Dir Lower and was appointed as Drawing Master (DM) vide order dated 01.11.2014. **(Copies of CNIC and order dated 01.11.2014, are annexed as annexure "A")**
2. That after completion of all codal formalities, the appellant took charge at Government Middle School, Galshegai, Maidan, Dir lower on 01.11.2014 and continued her services with zeal and zest and to the satisfaction of her high ups. **(Copies of charge report dated 01.11.2014 and medical report are annexed as annexure "B")**
3. That the appellant was unable to continue her services in GMS, Galshegai, Maidan due to security issues and life risks which was at a distance far flung from the appellant. Therefore, the appellant processed application for transfer from the aforementioned school vide application dated 07.11.2014 to respondent no.3. **(Copy of transfer application dated 07.11.2014 is annexed as annexure "C")**
4. The appellant was waiting for reply of the transfer application from respondent no.3, which is not responded till date. During this period the appellant was unable to attend her duty during to life and security threats. Furthermore, the husband of the appellant was abroad for job and her father is being an old aged ill person, and no one was there to help the appellant to reach the station of her duty, consequent upon the appellant was absent from her service for a long time.
5. That the appellant during the period of her absentia from the school visited the school but come know from the school staff and the headmistress through word of mouth that due to longer absentia her services have been terminated.

Furthermore, the appellant received no termination letter in black and white.

6. That the appellant during the period of wait after filing the application for transfer to respondent no.3, time and again inquired about the status of her transfer application by one or the other way from the office of respondent no.3, but was responded satisfactorily rather was kept at wait by the official staff of respondent no.3 in a hanging position.
7. That **the application of the appellant has been cancelled** by respondent no.3 vide order Endst;No.2520-22/D.No.03-Trans;DEO/F/Dir(U) dated. 02.07.2019 without any cogent and plausible reasons at the behest of political interference of respondent no.4. That the appellant filed representation/appeal before respondent no.3 time and again to inform her of the situation the appellant is going through, to inquire about her transfer application and to reinstate her services, but got no response till date. The representations/appeals before respondent no.3 were filed on 21.05.2015, 07.04.2016, 13.03.2017, 19.09.2018 and 23.09.2019. **(Copies of representations/appeals dated 21.05.2015, 07.04.2016, 13.03.2017, 19.09.2018 and 23.09.2019 are annexed as annexure "D")**
8. That appellant's husband returned to home from abroad permanently after winding up his job and tried for job/work in his home country but failed to do so and so the family of the appellant is living a famish life of deprivation and hardships as there is no single bread earner in the family.
9. That, actions and inactions of respondents No. 3 by not responding and considering the case of the appellant and keeping her at hanging position are illegal, ultra vires, ultra

shariah and against the established norms of administration, therefore, the appellant having no other adequate, speedy and efficacious remedies, but to approach this august court inter alia on the following grounds:

**Grounds:**

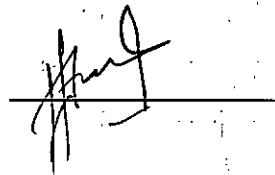
- i. That, actions and inactions of respondents No. 3 and 4 are illegal, ultra vires, ultra shariah and against the established norms of administration, therefore, are not tenable in the eyes of law.
- ii. That, appellant has not been dealt with in accordance with law, which is the worst example of discrimination, therefore, is against the fundamental rights of the appellant, as enshrined in Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- iii. That, appellant has been deprived of her legal right of service, safeguarded by constitution of Islamic republic of Pakistan, 1973.
- iv. That no opportunity of personal hearing has been provided to the appellant.
- v. That, appellant is the soul bread earner of his family, keeping him in hanging position by not allowing neither her transfer, nor re-instatement of service, is the worst example of maladministration, which is not tenable in the eye of law.
- vi. Any other ground not specifically raised will be argued with the prior permission of this August Court.

In view of the above, it is therefore very humbly prayed that, on acceptance of this writ petition, the official respondents may please be directed to re-instate the appellant with all back benefits and allow the transfer application of the appellant in accordance with law.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Appellant

Through Counsel



**Sardar Waqar Shahzad**

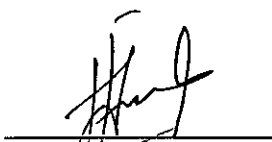
Advocate High Court

**Interim Relief:**

By way of interim relief, the respondent No. 3 may kindly be directed to allow the appellant to continue her services at her school, till disposal of the captioned service appeal.

Appellant

Through Counsel



**Sardar Waqar Shahzad**

Advocate High Court



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

Service Appeal No. \_\_\_\_\_ of 2020

Mst. Hena Begum

... **Appellant**

**VERSUS**

Government of KP and others.

... **Respondents**

**Certificate**

As per instructions received from my client, it is certified that no such like service appeal against the impugned orders, has been earlier filed before this Hon'ble Court.

**Appellant**  
**Through Counsel**

  
\_\_\_\_\_  
**Sardar Waqar Shahzad**  
**Advocate High Court**

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

Service Appeal No. \_\_\_\_\_ of 2020

Mst. Hena Begum

... **Appellant**

**VERSUS**

Government of KP and others.

... **Respondents**

**Address of Appellant:**

Mst. Hena Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village Mangai, Tehsil  
Balambat, Distt: Dir Lower

**NIC No:**

**Cell No. 03488101321**

**Addresses of Respondents:**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Female), Dir Lower at Timergara

**Appellant  
Through Counsel**

  
\_\_\_\_\_  
**Sardar Waqar Shahzad  
Advocate High Court**

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

Service Appeal No. \_\_\_\_\_ of 2020

Mst. Hena Begum

... **Appellant**

**VERSUS**

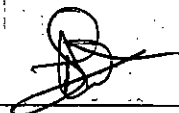
Government of KP and others.

... **Respondents**

**Affidavit**

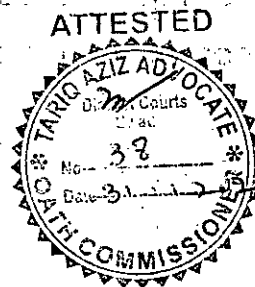
I Abdul Wahid S/O Bacha Hazrat R/O Village Manjai, Tehsil Balambat, Distt: Dir Lower (**Husband and Attorney of the Appellant**), do hereby solemnly affirm and declares on oath that, all the contents of the accompanying **service appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this Hon'ble court.

Deponent

  
 \_\_\_\_\_  
**Abdul Wahid**  
**(Attorney of the Appellant)**  
**CNIC: 15302-0962858-7**

Identified By:

  
 \_\_\_\_\_  
**Sardar Waqar Shahzad**  
**Advocate High Court**



# District Education Officer (F) Dir Lower

PH No. 0945-9250082,

E-mail emisdirlower@yahoo.com



## OFFICE ORDER:

Consequent upon the recommendation / approval of the District Selection Committee / District Promotion Committee Dir Lower in its meeting held on 10/10/2014, the following DM (Female) (School based) are hereby appointed in BPS-15 (Rs.8500-7029500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below:

S#	Name	Father Name	Address	Name of School	Score
1	SHEHLA BIBI	SahibZada Naveed Anjum	Village: and P.O Hayasari.	GGMS KHAN ABAD	101.16
2	NODIA	Siraj Uddin	Village: Basharo, P.O Ziarat Talash.	GGMS Soghalay	99.26
3	NAILA BEGUM	Gul Nawaz Khan	Village: & P.O Saddo, Timergara	GGHS BISHEGRAM	99.21
4	SEEMA GUL	Muhammad Nawaz Khan	Village: & P.O Odigan.	GGMS LAJBOOK	98.78
5	ADILA	Fazal Qahar	Village: Safary P.O Khall.	GGMS Khall Colony	97.31
6	NAGEENA BEGUM	Rahman Uddin	Village: Soghalay P.O Ziarat Talash	GGMS HANFIA	97.25
7	KHASHIA BEGUM	Irfan Ullah	Village: & P.O Munjai.	GGMS DAROO MAJAN	96.71
8	SAIMA	Altaf Hussain	Village: Moh: Ghari P.O Chakdara.	GGHS INZARO	94.77
9	GHAZALA NAZ	Fateh Khan	Village: Gul Muqam P.O Chakdara.	GGMS Dara Ramor	93.95
10	SUMAIRA BIBI	Gul Sahib Zada	Village: & P.O Hayasari	GGHS Zaimdara	93.14
11	ALIA BEGUM	Gul Nawaz Khan	Village: Shago Kass, P.O Bandaqai	GGMS SADBAR KAL	92.66
12	RUQIA BEGUM	Zainul Abidin	Village: & P.O Khall	GGMS Seer Tormar	92.62
13	ASMA SHAHZADI	Abdul Ghafar	Village: & P.O Chakdara.	GGHS Tawda China	92.18
14	FAZILAT	Muhammad Salar	Village: & P.O Shawa	GGMS JANGO	91.73
15	TAJ BEGUM	Mohammad Karim	Village: & P.O Danwa	GGMS Saligram	90.99
16	NAHIDA BEGUM	Khan Mula Khan	Village; Paloso Dog P.O Khazana	GGMS Maskihi	90.93
17	MALAK FAKHRA NAZ	Malak Wazir Zada	Village; Chargori P.O Balambat	GGMS ATTO	89.63
18	FAZEELAT BIBI	Muhammad Wali	Village: Ch. P.O Ziarat Talash	GGMS NIMAZ KOT	89.44
19	ZAINAB BEGUM	Muhammad Zamin Khan	Village; Khema P.O Timergara	GGMS SHAH KANDI	88.96
20	BUSHRA GHAFOR	Muhammad Ghafoor Khan	Village; & P.O Timergara	GGMS Adam Dheri	88.74
21	RUKHSANA NASIR	Nasir Ul Haq	Village; & P.O Timergara	GGHS BEYARI	88.73
22	UZMA SUNDASS	Naveed Ahmad	Village; & P.O Saddo.	GGHS SAMARBAGI	88.69
23	FAIZA FAIZ	Faiz Muhammad	Village; & P.O Manyal	GGMS KANDO MAC	87.76

Intikhab Photo State  
Near National Bank Colony,  
Balambat Chowk, Timergara.  
Ph: 0945-822994, Mob: 0300-9398707

	HIDAYAT BEGUM.	Fateh Muhammad			
25	SHAZIA AZIZ	Aziz Ullah	Village; & P.O Munda	GGMS DHERI KAM	86.78
26	GHAUSIA KHAN	Qareeb Ullah Khan	Village; & P.O Khungi	GGHS Moranai	86.39
27	SHABINA SAEED	Saeed Khan	Village; Pito P.O Khungi	GGMS KHAIR ABA	84.68
28	SALMA ISRAR	Muhammad Israr	Village; & P.O Tindodog.	GGMS MATOOR	84.62
29	LUBNA BEGUM	Mubarak Said	Village; Gul Muqam P.O Chakdara.	GGMS Bagh Kandi	84.37
30	SALMA BIBI	Fath Ur Rehman	Village; & P.O Haji Abad.	GGHS MANYAL	82.29
31	JAMILA BIBI	Shah Zamin Khan	House No. 151 Muhalla Mufti Abad Peshawar.	GGMS MARKHANI	82.16
32	ABIDA	Mohibullah	Village; Khan Sari P.O Ziarat Talash	GGMS BARKHANA	81.95
33	UZMA BAIG	Amin Ul Haq	Village; Mohalla Dellie, Mardan.	GGMS LIKOR KAM	81.69
34	SAMAN HUMA	Muzafar Said	Village; & P.O Mian Banda	GGMS Toormang	81.61
35	SAIQA..	Shah Sawar	Village: P.O Timergara	GGMS BANDAI MAIDAN	80.98
36	NAGINA BIBI	Amir Baz Khan	Village; Tora Tiga P.O Timergara	GGMS Tekni Bala	80.46
37	SHABINA BIBI	Muhammad Wali	Village; Khan Sari P.O Ziarat Talash	GGMS Terona	78.87
38	SHAHEEN KANWAL	Riaz Muhammad	Village; Chino Talash P.O Ziarat Talash	GGMS GALKOR LUQMAN BANDA	78.51
39	UZMA BIBI	Sher Zaman Khan	Village: & P.O Khanpur.	GGMS Tali Sia	77.74
40	HINA BEGUM	Abdur Rauf	Village: & P.O Balambat	GGMS Shagai	77.44
41	TAUID AHMAD	Ahmad Habib Ullah	Village: & P.O Timergara	GGMS GALL	75.08
			Village; Palo Shah P.O Chakdara	GGMS Bambo	71.21

*(Handwritten signature)*

**TERMS AND CONDITIONS:**

1. This order will commence from 01/11/2014 and shall continue til 31/10/2015 and shall not be construed in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
2. They will be entitled to emoluments of Rs. Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract per month for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
3. Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
4. They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
5. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rule framed from time to time.
7. Their appointment will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
8. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
9. NO TA/DA will be paid to them on joining the post.
10. Their age may not exceed 35 years or below 18 years.
11. Charge reports should be submitted to all concerned,

*(Handwritten initials)*

*(Handwritten signature)*

**Intikhab Photo State**  
Near National Bank Colony,  
Balambat Chowk, Timergara.  
No. 822994, Mob: 0300-9398707

- 12. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
- 13. This order is issued, errors and omissions accepted, as a notice only.
- 14. 40 % candidates have been initially recruited from amongst those candidates who have qualified NTS test for the purpose purely on merit.

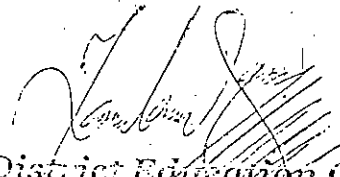
(Zaib Un Nisa)  
 District Education Officer (F)  
 District Dir Lower

Endst. No. 3690-93

Dated Timergara the 01/11/2013

Copy of the above is forwarded to:

- 1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. The Principals / Headmistresses of the institute concernd.
- 4. The Offcails concernd.

  
 District Education Officer (F)  
 District Dir Lower

CTC



**Intlichab Photo State**  
 Near National Bank Colony  
 Balambhat Chowk, Timergara.  
 Ph: 0945-822994, Mob: 0300-9398707

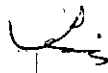
## CHARGE REPORT

In compliance with the orders issued vide DEO Dir Lower at Timergara No. 3690-93 dated Timergara the 1.11.2014.

I Mst Hina Begum D.M. took over the complete charge of my duties at Government Girls Middle School Gallshegai Maidan Dir Lower today on respectively 10.11.2014.  
Endst No. 369093

Dated 1.11.2014

T. Begum  
Head Mistress  
GGMS Gallshegai (Maidan)  
Distt: Dir (Lower)



CTL



MEDICAL CERTIFICATE

Name of official: Mrs' Hina Begum  
 Caste or race: MUSLIM  
 Fathor's name: Mr' Abdul Rauf w/o Abdul Wahid  
 Residence: Village and P.O. Manjar Teh' Balambhat  
Dir (Lower)  
 Date of birth: 01-01-1986  
 Exact height by measurement: 5' 3"  
 Personal mark of identification: A mole on the side chin  
 Signature of the official: Hina Begum  
 Signature of head of office: \_\_\_\_\_

Seal of office \_\_\_\_\_

I do hereby certify that I have examined Mr. Mrs' Hina Begum a candidate  
 for employment in the Office of the Education Department  
 and cannot discover that he had any disease communicable or other constitutional affection or bodily  
 infirmity except NIL

I do not consider this as disqualification for employment in the office of the Educat Dept  
 His age according to his own statement (28) year and by appearance about  
 year. Twenty Eight years.

[Signature]  
 MEDICAL SUPERINTENDENT  
 & C Hospital Manjar  
 Dir (Lower)  
 CIVIL HOSPITAL \_\_\_\_\_



[Signature]

[Signature]



خدمت ضابط دسترکٹ ایجوکیشن آفسر صاحب (فنی قیلم) ضلع دیرپا میں جہاں تمام غنہ گروہ

درخواست براد تبادله از MS کا گل میدان تحصیل لعل قلمہ  
ضلع دیرپا میں تاکسی قریبی سٹیشن تحصیل بلا صیٹ

جناب عالی! سائلہ حسب ذیل عرض رساں ہے۔

(1) یہ کہ سائلہ کی تقدری بحیث ڈرائنگ ماسٹر محترمہ 01-11-2014 بجھان کرڈر مذکورہ  
بلا صیٹ کو رخصت کر لیں مگر فیصلہ ملوں گل میدان میں تعینات کی گئی۔

(2) یہ کہ سائلہ نے باقاعدہ سکول میں ڈیوٹی کا چارج لیکر ڈیوٹی شروع کر کے تقریباً ایک  
ہفتہ باقاعدگی سے فرائض منصبی انجام دیتی رہی۔ (نقل چارج رپورٹ لیا ہے)۔

(3) یہ کہ سائلہ کو ڈیوٹی سٹیشن پر سیکوری وجوہات کی بناء پر آنے جانے میں شدید مشکلات کا  
سامنا ہے۔ شہر سائلہ لبرانی محنت مزدوری سعودی عرب میں مقیم ہے کور و لاد شہر  
بیمار ہے۔ لہذا سائلہ مذکورہ بالا سٹیشن پر ڈیوٹی انجام دینے سے قاصر ہے۔

استدعا ہے کہ سائلہ کو یہ منظوری درخواست ہذا سائلہ کا  
تبادله فرما کر MS کا گل سے کسی قریبی سٹیشن واقع  
تحویل بلا صیٹ پر تعینات کرنے کا حکم صادر فرمایا جائے۔

تعمیر 7/11/2014

منی

C TC

[Handwritten signature]

سائلہ! صیٹ ضابطہ تعلیم و ثقافت سیدہ العزیزہ زوجہ عبدالواحد سکنہ نئی  
تحویل بلا صیٹ ضلع دیرپا

درخواست فیاد بحالی بوجلاؤمت

جناب عالی! سائیکل حسب ذیل عرض رساں ہے۔

- ① یہ کم سائیکل کی تقدری کھیٹ ڈرائنگ ماسٹر محروسہ 11-2014ء مطابق اردو مذکورہ بالا پتہ پر سائیکل گورنمنٹ گرنڈ سکول گل میدان میں تعمیرات کی گئی۔
- ② یہ کم سائیکل نے اقدہ سکول میں ڈیوٹی کا جان لیوے ڈیوٹی شروع کرتے تقریباً ایک ہفتہ باقدعتی سے فرائض منصبی انجام دئیے ہیں۔ (نقل جان رپورٹ لف ہے)
- ③ یہ کم سائیکل نے سیکوریٹی خدمات کے بناء پر بناء کی درخواست بھی کی۔ مگر بناء نہ ہو کر سائیکل کو بامر مجبوری تعمیر اجازت طویل غیر حاضری کرنا پڑی۔
- ④ یہ کم سائیکل کو ملاؤمت پر بحال کرنا ضروری اور قدرتی انصاف ہے۔

امداداً ہے کہ سائیکل کو ملاؤمت پر بحال کرنا ضروری اور قدرتی انصاف ہے۔

CTC



مورخہ 21-05-2015

منسل

سائیکل! مسماہ حنا دیکم رضیر عبدالرؤف زوجہ عبدالواحد  
سکنہ فکالی کھیل پلاٹ نمبر 10 دیر پانچ

خبردار سے جناب ڈیپٹی کمشنر کے رجسٹریشن آفیسر صاحب (ف) بھکرہ

دروازت سے برادری علی بر ملازمت

جناب عالی! سائید صاحب نے ذیل مرضی ارسال کی ہے۔

(1) یہ کہ سائید کی تقرری ٹیٹ ڈرائیونگ ماسٹر عوامی 2014 11 01 بتایا گیا اور مذکورہ بالا پورے سائید کو زونٹ گرانڈل سکول گل مہال میں تعینات کی گئی۔

(2) یہ کہ سائید نے باقاعدہ سکول میں ڈیوٹی کا حراج لیگڈ ریوٹی شروع کر کے نوٹس بک یافتہ باقاعدگی سے فراٹن منجی انجام دینا ہی۔ (محل حراج اور ٹیٹ ٹیٹ)

(3) یہ کہ سائید نے سیکورٹی خدشات کے بنا پیر تبادہ کی درخواست میں ہی مگر تبادہ نہ ہو کر سائید کو یہ امر جموری بغیر اجازت طویل عرصہ 4 فری کرنا پڑی۔ حالانکہ سائید نے حراج 05 21 کو ملازمت پر بحالی کیلئے درخواست میں دے رکھی ہے۔

(4) یہ کہ سائید کو ملازمت پر بحال کرنا اور فرینٹ انفاس ہے۔

انتہا ہے کہ سائید کو ملازمت پر بحال کرنا اور فرینٹ انفاس ہے

CTC  
[Signature]

تاریخ: 07 04 2016

[Signature]

سائید صاحبہ صاحبہ بیگم دلہز عبدالرؤف زوالہ عبدالواحد صاحبہ صاحبہ

درخواست نمبر ایڈووکیٹ بائبل لکچر نمبر

جناب عالی! سائلہ صاحبہ ذیل عرض ارسال ہے۔

- (1) یہ کہ سائلہ کی تقرری بحیثیت ڈرائیونگ ماسٹر مورف  $11/2014$  و  $05/11/2014$  بقاعدہ سڈن بنگلورہ بالا ہو کر سائلہ کی ڈرائیونگ سیکولر اسکول قلم میدان میں تعینات کی گئی۔
- (2) یہ کہ سائلہ نے بقاعدہ سڈن اسکول میں ڈیوٹی کا چارج سیکر ڈیوٹی سروس کی طرف تقریباً ایک ہفتہ بقاعدہ سے خالی رہنے کی اجازت لی اور اس دوران (نقل و حرکت اور ٹرانسفر) سے سائلہ نے سیکورٹی خدمات سے بنا کر تیار رہی۔
- (3) یہ کہ سائلہ نے سیکورٹی خدمات سے بنا کر تیار رہی اور اس دوران بھی کسی ملکہ تیار رہی نہ ہو کر سائلہ کو یہ امر سمجھنا پڑا کہ اس کی درخواست بھی گئی۔ ملکہ تیار رہنے سے مورف  $05/2015$  اور  $07/2015$  کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے اور اس سے سائلہ کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے اور اس سے سائلہ کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے۔
- (4) یہ کہ سائلہ کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے اور اس سے سائلہ کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے۔

اسلئے دعا ہے کہ سائلہ کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے اور اس سے سائلہ کو ملازمت پر بحالی کیلئے درخواست دی گئی ہے۔  
اور فریقین الصاف ہے۔

C. T. C  
[Signature]

مورف 2017-3-15

---

سائلہ عنیٰ عاتق و صبح وقتہ العبد العارف زود بعد الوالد سائلہ عنیٰ انفسہ بلالہ اللہ صبراً و  
[Signature]

درخواست برائے بحالی بملازمت

جناب عالی! سائیکل حسب ذیل عرض رسیاں ہے۔

(1) یہ کہ سائیکل کی تقرری بحیثیت ڈرائیونگ ماسٹر مورخہ 01-11-2014

مطابق اور ڈرامہ کورس بالا ہو کر سائیکل گورنمنٹ گڈ لرننگ سکول  
مگل سیران میں تعینات کی گئی۔

(2) یہ کہ سائیکل نے باقاعدہ سکول میں ڈیوٹی کا چارج ٹیکر ڈیوٹی  
شروع کر کے تقریباً ایک ہفتہ یا قاعدگی سے فرائض منصبی انجام  
دیتی رہی۔ (نقل چارج رپورٹ لف ہے)


(3) یہ کہ سائیکل نے سکپورٹی خدشات کے بناء پر تبادلے کی درخواست  
بھیجی۔ مگر تبادلہ نہ ہو کر سائیکل کو یہ امر مجبوری بغیر  
اجازت طویل عرصہ چاہری کرنا پڑی۔ حالانکہ سائیکل نے

مورخہ 21-05-2015 اور 07-04-2016 اور 13-03-2017 کو  
ملازمت پر بحالی کیلئے درخواست ہائے بھیجی رہی ہے۔

(4) یہ کہ سائیکل کو ملازمت پر بحال کرنا ضروری اور فریب  
انصاف ہے۔

استدعا ہے کہ سائیکل کو ملازمت پر بحال

کرنا ضروری اور فریب انصاف ہے۔

C.T.C  


مورخہ 19-09-2018

سائیکل! سہماة حناء بیگم دختر عبد الرؤوف زوجہ عبد الواحد سکندر ضلع  
مگل بلومنگ ضلع دیر نائین

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (فی میل) ضلع دیرپائین بمقام میجر گمرہ

درخواست بمراد بجالی بر ملازمت بمطابق آرڈر نمبر 93-3690 مورخہ

20

01-11-2014 بہ سلسلہ نمبر 40

جناب عالی! سائیلہ حسب ذیل عرض رساں ہے۔

(1) یہ کہ سائیلہ کی تقرری بحیثیت ڈرائیونگ ماسٹر مورخہ 01-11-2014 بمطابق آرڈر نمبر کورہ بالا ہو کر سائیلہ گورنمنٹ گرلز مڈل سکول گل میدان میں تعینات کی گئی۔

(2) یہ کہ سائیلہ نے باقاعدہ سکول میں ڈیوٹی کا چارج لیکر ڈیوٹی شروع کر کے تقریباً ایک ہفتہ باقاعدگی سے فرائض منصبی انجام دیتی رہی۔ (نقل چارج رپورٹ لف ہے)

(3) یہ کہ سائیلہ کو سیکیورٹی خدشات اور دیگر مسائل کی وجہ سے فاصلہ دراز ہونے کی وجہ سے ڈیوٹی انجام دینے میں مشکلات کا سامنا رہا۔ بدیں وجہ سائیلہ نے مورخہ 07-11-2014 کو دفتر حضور میں تبادلہ کی درخواست دے کر سائیلہ درخواست پر عمل درآمد کا انتظار کرتی رہی۔ مگر کوئی شنوائی نہیں ہوئی اور سائیلہ جان کی آمان کی خاطر مزید ڈیوٹی انجام دینے سے قاصر رہی۔ کیونکہ شوہر سائیلہ بھی بغرض محنت مزدوری بیرون ملک مقیم تھا اور والد سائیلہ شدید بیمار ہو کر سائیلہ کیساتھ ڈیوٹی سٹیشن پر کوئی ذمہ دار شخص نارینہ موجود نہ تھا۔ بدیں وجہ سائیلہ کو بہ امر مجبوری طویل عرصے تک غیر حاضر ہونا پڑا۔

(4) یہ کہ کچھ عرصہ بعد شوہر سائیلہ بیرون ملک کام کاج سے فارغ ہو کر گھر آیا اور شوہر سائیلہ بھی بیروزگاری کی زندگی گزار رہا ہے۔ سائیلہ نے شوہر کی بیروزگاری ہونے کے بعد متعدد بار دفتر حضور کو درخواست دے رکھی۔ مگر صدا بہ صحرا ثابت ہوئی۔ سائیلہ نے ایک عدد درخواست بمورخہ 21-05-2015 کو ایک عدد درخواست بمورخہ 07-04-2016 اور اسکے بعد 13-03-2017 اور اسکے بعد 19-09-2018 کو ملازمت پر بجالی کیلئے دے دئے۔ مگر سائیلہ کی حالت ذار پر رحم نہیں کی گئی۔ اور سائیلہ اور سائیلہ کی شوہر دونوں بیروزگاری کی زندگی گزار کر بچوں کی تعلیم اور گھر کا معاشی صورت حال انتہائی ازیت میں گزار رہے ہیں۔ کاپی لٹھی ہے استدعا ہے کہ سائیلہ کو بہ منظوری درخواست ہذا ملازمت پر بحال کر کے سائیلہ کی خاندان کو فاقوں سے بچانے میں مدد فرما کر مشکور فرمائے۔ درخواست ہذا پر عمل درآمد نہ ہونے کی صورت میں سائیلہ عدالت کا دروازہ کھٹکھٹانے پر مجبور ہوگی۔

C T C

مورخہ: 23-09-2019

صحت

سائیلہ: مسماۃ حناء بیگم دختر عبدالرؤف زوجہ عبدالواحد سکنہ منجائی تحصیل بلا مٹ ضلع دیرپائین۔

کاپی برائے اطلاعاتی

(1) ڈپٹی کمشنر صاحب ضلع دیرپائین بمقام میجر گمرہ (2) ڈائریکٹر ایجوکیشن صوبہ خیبر پختونخواہ بمقام پشاور

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

22

**WAKALAT NAMA**

Service Appeal No. \_\_\_\_\_/2020

Titled

Mst. Hena Begum Versus Government of KPK & others

**I Mst. Hena Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village Mangai,**  
**Tehsil Balambat, Distt: Dir Lower** do hereby appoint **Sardar Waqar Shahzad**  
**Advocate, High Court (s)**, in the above mentioned case, to do all or any of the  
following acts, deeds and things:-


- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this /01/2020.

***Signature of Executants:***

  
\_\_\_\_\_

**ACCEPTED BY:**

  
\_\_\_\_\_

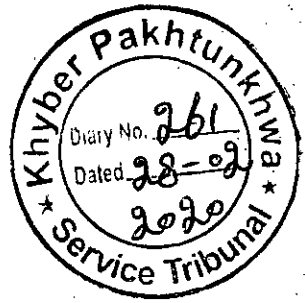
**SARDAR WAQAR SHAHZAD**  
**Advocate, High Court (s)**

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Mst. HENA BEGUM

vs

Govt. KPK



Post up 30 Ru  
Secret charges  
original file.

28/02/2020

Application for early hearing

X

X

Respectfully sheweth;

- 1) That the petitioner has submitted the above mentioned titled case before the Honorable Services Tribunal Peshawar.
- 2) Pet that the petitioner seeks transfer of the titled case to Services Tribunal Sوات (Camp Court); at the earliest in next week of 'March' 2020.
- 3) That the petitioner has already suffered for five years.

It is therefore humbly prayed that the case be transferred to Sوات camp court at earliest.

Dated: 28/02/2020

Through

*[Signature]*

AFSPA WA 2 (AUC)



**"A"**

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

No. *Office objection*

APPEAL No..... of 20

*Mst. Hema Begum*

Appellant/Petitioner

Versus

*Through Secy: Edu: KPSC Pesh:*

RESPONDENT(S)

Notice to *Council* Appellant/Petitioner

*Sardar Waqar Shahzad  
Advocate High Court  
Swat*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *9-4-2020* 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.

*at Camp Court Swat*

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

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

**Service Appeal No.7453/2020**

1. Mst.Hena Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village  
Munjai, Tehsil Balambat District Dir Lower... .. (Appellant)

Versus

1. Government of KPK through Secretary Elementary and secondary  
Education Khyber Pakhtunkhwa Peshawar.

2. Director, Elementary and secondary Education Khyber  
Pakhtunkhwa Peshawar.

3. District Education Officer (F) Dir Lower:

(Respondents)

Index:

S.No	Description	Annexure	Page
1	Para wise comments		1-2-3-4-5
2	Affidavit		6
3	Authority Letter		7
4	Copies of Extension orders dated 02- 11-2015 & 21-11-2016	"A"	8-9-10-11
5	Copy of Regularization order dated 12-03-2018	"B"	12-13-14-15-16-17



District Education Officer (F)

Dir Lower

①

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

**Service Appeal No.7453/2020**

1. Mst.Hena Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village  
Munjai,Tehsil Balambat District Dir Lower... .. (Appellant)

Versus

1. Government of KPK through Secretary Elementary and secondary  
Education, Khyber Pakhtunkhwa Peshawar.

2. Director, Elementary and secondary Education, Khyber  
Pakhtunkhwa Peshawar.

3. District Education Officer (F), Dir Lower.

(Respondents)

**PARA WISE COMMENTS ON BEHALF OF RESPONDENT**

**No. 1 to 3.**

**Respectfully sheweth:-**

**PRELIMINARY OBJECTIONS**

1. That the Appellant is not the "aggrieved" persons within the meaning of Article 212 of the Constitution of the Islamic Republic of Pakistan 1973.

2. That the Appellant has got no cause of action /locus standi to file this Service Appeal because the Appellants did not come on merit.

3. That the Appellant has not come to this Honorable court with clean hands rather than the instant petition is mainly based on malafide intentions, just to put pressure on the respondent department for illegal reinstatement.

4. That the Appellant is estopped by his own conduct.

5. That the instant Service Appeal is badly time barred and barred by law.

6. That the petition in hand is barred by the relevant provision of Law/Rules/Policy in Field.

7. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.

8. That as per report of the Head mistress concerned, the Appellant assumed charge on 01-11-2014 and assuming of charge, she remained continuously absent from her duty.

9. That the appellant was a contract employee, appointed just for a period of one year, on adhoc basis, hence the jurisdiction of this court is ousted under the express provisions of the Constitutions.

### **REPLY ON FACTS**

1. Para -1 is correct to the extent of the appointment of the Appellant appointment as D.M vide order dated 01-11-2014 Aneex-A) with the terms & Condition No.1 "This order will commence from 01/11/2014 and shall continue till 31/10/2015 and this offer will, however, not construe in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department". and in terms and conditions No 6, it is mentioned that "their service shall be terminated at any time; in case their performance is found unsatisfactory during their contract period. In case of miss conduct, they shall be proceeded under the rule framed from time to time." Hence the appellant was appointed on contract period just for a specific period of one year in which she did not performed her duties" so her appointment order was withdrawn vide Endstt: No.2313-16 dated 09-05-2015. (Annex-B)

2. Para -2 is correct to the extent of the charge, report of the Appellant taken on 01-11-2014, but after taking of charge the Appellant remained continuously absent from her duty for a long time. The Head mistress concerned informed her time and again for resuming of her duty but she did not join her duty, that's why her appointment order was withdrawn vide office order dated 09-05-2015. It is also pertinent to mention here that all those

candidate/appointees of the appointment order dated 01-11-2014, who were in service, extension were made in their service on

Yearly basis and later on were regularized into service vide Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of services) Act 2018. While the appellant was not in service as her appointment /Contract was withdrawn due to will full absence vide order dated 09-05-2015.

**(Copy of the extension orders dated 21-11-2015 and 21-11-2016 are attached as "C" and copy of regularization order dated 12-03-2018 is attached is "D")**

3. Para -3 is incorrect, hence denied. Further stated that the claim of the appellant regarding security risk is fake as she did not filed any application for transfer neither she had provided any documents/proof regarding security risk to the office of the DEO (F) Dir Lower, nor she was entitled for transfer, due to her appointment on contract school base for a specific period of one year. Furthermore, appellant was appointed vide office order dated 01-11-2014 as D.M on Adhoc, School based just for one year contract and she was bound to follow the terms and conditions of the appointment order dated 01-11-2014 in which she failed, so her appointment order/contract was withdrawn vide order dated 09-05-2015.

4. Para-4 is incorrect, hence denied and further stated that the appellant did not approached the office of the respondent No.2 nor she had filed any appeal.

5. Para -5 of the facts is also incorrect regarding school visit, hence denied, and further stated that although, being adhoc /contract employee the Appellant was bound to follow the terms and conditions mentioned in the appointment order ,but she failed and

due to non-compliance, her contract order was withdrawn accordingly.

6. Incorrect, hence denied. Detail reply has been submitted in the Para-5 above.

7. Para-7 is incorrect, hence denied. The appellant had not filed any application for any redressal, however the captioned application (Available at Para-7 of the service appeal) having Endstt; No.2520-22/D.No. 03- Trans; DEO/F/Dir (U) dated 02-07-2019 pertains to the office of the DEO (F) Dir Upper while the appellant belongs to the office of the DEO(F) Dir Lower, furthermore neither appellant has filed any application nor decided by answering respondent and respondent. Hence, on the ground of limitation too, the instant service appeal filed on malafidely intention for illegal reinstatement is liable to be dismissed in favour of the answering respondents.

8. Para-8 is not relevant to answering respondents reply.

9. Para-9 is also incorrect, hence denied. Details have been submitted in the Paras ibid. Moreover the instant appeal is not maintainable on following grounds.

### **REPLY ON GROUNDS**

I) Incorrect, hence denied, the respondent always follow rules and policies in letter and spirit. The Appellant has been treated as per law and rules. Furthermore, DEO Female Dir Upper has not been made party in the instant service appeal.

II) Para-B is incorrect, hence denied; the Appellant did not join her duty that's why, her contract was withdrawn as per law and rules.

III) Incorrect, hence denied. Again, it is stated that the Appellant was appointed on contract /school basis for a specific period of one

year, the Appellant was bound to follow the terms and conditions mentioned in the appointment order, but she failed to do so and due to non compliance, her contract/appointment order was withdrawn accordingly.

IV) Incorrect, hence denied, detail reply has been submitted in the above paras.

V) Incorrect hence, denied, detail reply has been submitted in the Facts above.

VI) Legal, However the respondent also seeks permission for additional grounds during arguments.

It is, therefore, humbly prayed that on acceptance of the above submission, the instant Service Appeal filed with Malafide intention, just for the purpose of illegal reinstatement, may very graciously be dismissed in favor of the answering respondents with heavy cost.

District Education Officer (F)  
Dir Lower  
Respondent No.3

Director  
Elementary and secondary Education  
Khyber Pakhtunkhwa Peshawar  
Respondent No.2

Secretary,  
Elementary and secondary Education  
Khyber Pakhtunkhwa Peshawar  
Respondent No.1

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

**Service Appeal No.7453/2020**

1. Mst.Hena Begum D/O Abdur Rauf W/O Abdul Wahid R/O Village  
Munjai,Tehsil Balambat District Dir Lower... .. (Appellant)

Versus

1. Government of KPK through Secretary Elementary and secondary  
Education Khyber Pakhtunkhwa Peshawar.

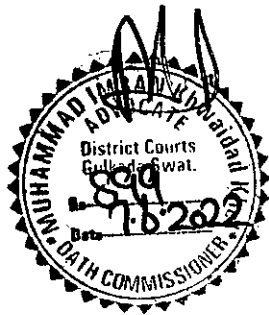
2. Director, Elementary and secondary Education Khyber  
Pakhtunkhwa Peshawar.

3. District Education Officer (F) Dir Lower.

(Respondents)

**Affidavit**

I, **Muhammad Usman ADEO** (Primary establishment)  
o/o DEO (F) Dir Lower do hereby solemnly affirm and state on oath that the  
whole contents of this reply are true and correct to the best of my knowledge  
and belief and nothing has been concealed from this August court.



*Muhammad Usman*  
**Deponent**  
**Muhammad Usman Khan**





## District Education Officer (F) Dir Lower

Ph# 0945-9250083  
E-mail:- dcofdirlower@yahoo.com

### OFFICE ORDER:

Under the provision of Section 4 of Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011, Contract Period of the following DM female is hereby extended for the period with effect from 01/11/ 2015 to 31/10/2016 on School based in BPS-15 (Rs.10985-905-38135) @ Rs. 10985/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

S#	Name	Father Name	Address	Name of School	Score
1	SHELA BIBI	SAHIB ZADA NAVEED ANJUM	VILLAGE: AND P.O HAYA SERAI	GGHS KHANABAD	101.16
2	NODAI	SIRAJ UD DIN	VILLAGE: BASHARO P.O ZIARAT TALASH	GGMS SOGHALAY	99.26
3	NAILA BEGUM	GUL NAWAZ KHAN	VILLAGE: AND P.O SADDO TIMERGARA	GGHS BISHEGRAM	99.21
4	SEEMA GUL	MUHAMMAD NAWAZ KHAN	VILLAGE: AND P.O ODIGRAM	GGMS LAJBOOK	98.78
5	ADILA	FAZAL QAHR	VILLAGE: SAFARY P.O KHALL	GGMS Khall Colony	97.31
6	NAGEENA BEGUM	RAHMAN UD DIN	VILLAGE: SOGHALY P.O ZIARAT TALASH	GGMS HANFIA	97.25
7	KHASHIA BEGUM	IRFAN ULLAH	VILLAGE: AND P.O MUNJAI	GGMS DAROO MAIDAN	96.71
8	SAIMA	ALTAH HUSSAIN	VILLAGE: MOH: GHARI P.O CHAKDARA	GGHS INZARO	94.77
9	GHAZALA NAZ	FATEH KHAN	VILLAGE: GUL MUQAM P.O CHAKDARA	GGMS Dara Ramora	93.95
10	SUMAIRA BIBI	GUL SHIB ZADA	VILLAGE: AND P.O HAYA SERAI	GGHS Zaimdara	93.14
11	ALIA BEGUM	GUL NAWAZ KHAN	VILLAGE: SHAGO KAS P.O BANDAGAI	GGMS SADBAR KALAI	92.66
12	RUQIA BEGUM	ZAINUL ABIDIN	VILLAGE: AND P.O KHALL	GGMS Seer Tormang	92.62
13	ASMA SHAHZADI	ABDUL GHAFAR	VILLAGE: AND P.O CHAKDARA	GGHS Tawda China	92.18
14	FAZILAT	MUHAMMAD SALAR	VILLAGE: AND P.O SHAWA	GGHS JANGO	91.73
15	TAJ BEGUM	MUHAMMAD KARIM	VILLAGE: AND P.O DANWA	GGMS Saligram	90.99
16	NAHIDA BEGUM	KHAN MULA KHAN	VILLAGE: AND P.O PALOSO DAG P.O KHAZANA	GGMS Maskini	90.93
17	MALAK FAKHRA NAZ	MALAK WAZIR ZADA	VILLAGE: CHARGORI P.O BALAMBAT	GGMS ATTO	89.63
18	ZAINAB BEGUM	MUHAMMAD ZAMIN KHAN	VILLAGE: KHEMA P.O TIMERGARA	GGHS SHAL KANDI	88.96
19	BUSHRA GHAFOOR	MUHAMMAD GHAFOOR KHAN	VILLAGE: AND P.O TIMERGARA	GGMS Adam Dheri	88.74
20	RUKHSANA NASIR	NASIR UL HAQ	VILLAGE: AND P.O TIMERGARA	GGHS BEYARI	88.73
21	UZMA SUNDASS	NAVEED AHMAD	VILLAGE: AND P.O SADDO	GGHSS SAMARBAGH	88.69
22	FAIZA FAIZ	FAIZ MUHAMMAD	VILLAGE: AND P.O MANYAL	GGMS KANDO MACHLA	87.26
23	HIDAYAT BEGUM	FATEH MUHAMMAD	VILLAGE: AND P.O MUNDA	GGMS DHERI KAMBAT	86.78
24	SHAZIA AZIZ	AZIZ ULLAH	VILLAGE: AND P.O KHUNGI	GGHS Moranai	86.39
25	GHAUSIA KHAN	QAREEB ULLAH KHAN	VILLAGE: PAITO P.O KHUNGI	GGMS KHAIR ABAD	84.68

26	SHABINA SAEED	SAEED KHAN	VILLAGE: AND P.O TINDODOG	GGMS MATOOR	84.62
27	SALMA ISRAR	MUHAMMAD ISRAR	VILLAGE: GUL MUQAM P.O CHAKDARA	GGMS Bagh Kandi	84.37
28	LUBNA BEGUM	MUBARA SAID	VILLAGE: AND P.O HAJI ABAD	GGHS MANYAL	82.29
29	SALMA BIBI	FATH UR REHMAN	HOUSE NO. 151 MUHALLA MUFI ABAD PESHAWAR.	GGMS MARKHANI	82.16
30	JAMILA BIBI	SHAH ZAMIN KHAN	VILLAGE: KHAN SARI P.O ZIARAT TALASH	GGMS BARKHANAI	81.95
31	ABIDA	MOHIB ULLAH	VILLAGE: MOHALLA DELLIE MARDAN.	GGMS LIKOR KAMBAT	81.69
32	UZMA BAIG	AMIN UL HAQ	VILLAGE: AND P.O MIAN BANDA	GGMS Toormang	81.61
33	SAMAN HUMA	MUZAFAR SAID	VILLAGE: AND P.O TIMERGARA	GGMS DANDAI MAIDAN	80.98
34	SAIQA	SHAH SAWAR	VILLAGE: TORA TIGA P.O TIMERGARA	GGMS Tekni Bala	80.46
35	NAGINA BIBI	AMIR BAZ KHAN	VILLAGE: KHAN SARI P.O ZIARAT TALASH	GGMS Terona	78.87
36	SHABINA BIBI	MUHAMMAD WALI	VILLAGE: CHINO TALSH P.O ZIARAT TALASH	GGMS GALKOR LUQMAN BANDA	78.51
37	SHAHEEN KANWAL	RIAZ MUHAMMAD	VILLAGE: AND P.O KHANPUR	GGHS Tali Sia	77.74
38	UZMA BIBI	SHER ZAMAN KHAN	VILLAGE: AND P.O BALAMBAT	GGMS Shagai	77.44
39	Tauid Ahmad	AHMAD HABIB ULLAH	VILLAGE: PALO SHAH P.O CHAKDARA	GGMS Bamboli	71.21

Terms and conditions will remain the same as in order No.3690-93 dated 01/11/2014.

(Zaib un Nisa)  
District Education Officer (F)  
District Dir Lower

Endst. No. 6761-64

Dated Timergara the 21/11/2015

Copy of the above is forwarded to:

21-11-2015

1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
2. The District Accounts Officer Dir Lower.
3. The Principals / Headmaster of the institute concerned.
4. The Officals concerned.

  
District Education Officer (F)  
District Dir Lower



10

# District Education Officer (F) Dir Lower

Ph # 0945-9250083  
E-mail:- deofdirlower@yahoo.com

## OFFICE ORDER:

Under the provision of Section 4 of Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011, Contract Period of the following DM female is hereby extended for the period with effect from 01/11/ 2016 to 31/10/2017 on School based in BPS-15 (Rs.13510-1120-47110) @ Rs. 13510/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:-

S#	Name	Father Name	Address	Name of School	Score
1	SHELA BIBI	SAHIB ZADA NAVEED ANJUM	VILLAGE: AND P.O HAYA SERAI	GGHS KHANABAD	101.16
2	NODAI	SIRAJ UD DIN	VILLAGE: BASHARO P.O ZIARAT TALASH	GGMS SOGHALAY	99.26
3	NAILA BEGUM	GUL NAWAZ KHAN	VILLAGE: AND P.O SADDO TIMERGARA	GGHS BISHEGRAM	99.21
4	SEEMA GUL	MUHAMMAD NAWAZ KHAN	VILLAGE: AND P.O ODIGRAM	GGMS LAJBOOK	98.78
5	ADILA	FAZAL QAHR	VILLAGE: SAFARY P.O KHALL	GGMS Khall Colony	97.31
6	NAGEENA BEGUM	RAHMAN UD DIN	VILLAGE: SOGHALY P.O ZIARAT TALASH	GGMS HANFIA	97.25
7	KHASHIA BEGUM	IRFAN ULLAH	VILLAGE: AND P.O MUNJAI	GGMS DAROO MAIDAN	96.71
8	SAIMA	ALTAF HUSSAIN	VILLAGE: MOH: GHARI P.O CHAKDARA	GGHS INZARO	94.77
9	GHAZALA NAZ	FATEH KHAN	VILLAGE: GUL MUQAM P.O CHAKDARA	GGMS Dara Ramora	93.95
10	SUMAIRA BIBI	GUL SHIB ZADA	VILLAGE: AND P.O HAYA SERAI	GGHS Zaimdara	93.14
11	ALIA BEGUM	GUL NAWAZ KHAN	VILLAGE: SHAGO KAS P.O BANDAGAI	GGMS SADBAR KALAI	92.66
12	RUQIA BEGUM	ZAINUL ABIDIN	VILLAGE: AND P.O KHALL	GGMS Seer Tormang	92.62
13	FAZILAT	MUHAMMAD SALAR	VILLAGE: AND P.O SHAWA	GGHS JANGO	91.73
14	TAJ BEGUM	MUHAMMAD KARIM	VILLAGE: AND P.O DANWA	GGMS Saligram	90.99
15	NAHIDA BEGUM	KHAN MULA KHAN	VILLAGE: AND P.O PALOSO DAG P.O KHAZANA	GGMS Maskini	90.93
16	MALAK FAKHRA NAZ	MALAK WAZIR ZADA	VILLAGE: CHARGORI P.O BALAMBAT	GGMS ATTO	89.63
17	ZAINAB BEGUM	MUHAMMAD ZAMIN KHAN	VILLAGE: KHEMA P.O TIMERGARA	GGHS SHAL KANDI	88.96
18	BUSHRA GHAFOOR	MUHAMMAD GHAFOOR KHAN	VILLAGE: AND P.O TIMERGARA	GGMS Adam Dheri	88.74
19	RUKHSANA NASIR	NASIR UL HAQ	VILLAGE: AND P.O TIMERGARA	GGHS BEYARI	88.73
20	UZMA SUNDASS	NAVEED AHMAD	VILLAGE: AND P.O SADDO	GGHSS SAMARBAGH	88.69
21	FAIZA FAIZ	FAIZ MUHAMMAD	VILLAGE: AND P.O MANYAL	GGMS KANDO MACHLA	87.26
22	HIDAYAT BEGUM	FATEH MUHAMMAD	VILLAGE: AND P.O MUNDA	GGMS DHERI KAMBAT	86.78
23	SHAZIA AZIZ	AZIZ ULLAH	VILLAGE: AND P.O KHUNGI	GGHS Moranai	86.39
24	GHAUSIA KHAN	QAREEB ULLAH KHAN	VILLAGE: PAITO P.O KHUNGI	GGMS KHAIR ABAD	84.68
25	SHABINA SAEED	SAEED KHAN	VILLAGE: AND P.O TINDODOG	GGMS MATOOR	84.62

26	SALMA ISRAR	MUHAMMAD ISRAR	VILLAGE: GUL MUQAM P.O CHAKDARA	GGMS Bagh Kandi	84.37
27	LUBNA BEGUM	MUBARA SAID	VILLAGE: AND P.O HAJI ABAD	GGHS MANYAL	82.29
28	SALMA BIBI	FATH UR REHMAN	HOUSE NO.151 MUHALLA MUFI ABAD PESHAWAR.	GGMS MARKHANI	82.16
29	JAMILA BIBI	SHAH ZAMIN KHAN	VILLAGE: KHAN SARI P.O ZIARAT TALASH	GGMS BARKHANAI	81.95
30	ABIDA	MOHIB ULLAH	VULLAGE: MOHALLA DELLIE MARDAN.	GGMS LIKOR KAMBAT	81.69
31	UZMA BAIG	AMIN UL HAQ	VILLAGE: AND P.O MIAN BANDA	GGMS Toormang	81.61
32	SAMAN HUMA	MUZAFAR SAID	VILLAGE: AND P.O TIMERGARA	GGMS BANDAI MAIDAN	80.98
33	SAIQA	SHAH SAWAR	VILLAGE: TORA TIGA P.O TIMERGARA	GGMS Tekni Bala	80.46
34	NAGINA BIBI	AMIR BAZ KHAN	VULLAGE: KHAN SARI P.O ZIARAT TALASH	GGMS Terona	78.87
35	SHABINA BIBI	MUHAMMAD WALI	VILLAGE: CHINO TALSH P.O ZIARAT TALASH	GGMS GALKOR LUQMAN BANDA	78.51
36	SHAHEEN KANWAL	RIAZ MUHAMMAD	VILLAGE: AND P.O KHANPUR	GGHS Tali Sia	77.74
37	UZMA BIBI	SHER ZAMAN KHAN	VILLAGE: AND P.O BALABMBAT	GGMS Shagai	77.44
38	Tauid Ahmad	AHMAD HABIB ULLAH	VILLAGE: PALO SHAH P.O CHAKDARA	GGMS Bamboli	71.21

*Terms and conditions will remain the same as in order No.3690-93 dated 01/11/2014.*

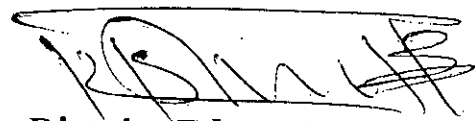
**(Nusrat Bibi)**  
**District Education Officer (F)**  
**District Dir Lower**

Endst. No. 5197-5200

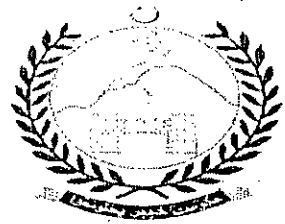
Dated Timergara the 21/11/2016

Copy of the above is forwarded to:

1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
2. The District Accounts Officer Dir Lower.
3. The Principals / Headmaster of the institute concernd.
4. The Offcails concernd.

  
**District Education Officer (F)**  
**District Dir Lower**

### District Education Officer Female Dir Lower



PH No. 0945-9250083,  
Fax : 0945-824083  
E-mail [emisdeofdirlower@gmail.com](mailto:emisdeofdirlower@gmail.com)

### Notification.

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), & Elementary and Secondary Education Govt: of Khyber pukhtonkha notification No.SO(S/F) E&SED/3-2/2018/SITT/Contract dated:16/02/2018, Services of the following Drawing Master's (DM's) appointed on adhoc basis on Contract, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the DM post :-

#### DM-2014

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
1.	2430243	Shehla Bibi	Village & P/O Hayaserai CNIC No 15306-2446214-0	101.16	GGMS Khan Abad	No.3690-93 Date: 01/11/2014	5197-5200 Dated: 21-11-20216
2.	2430149	Nodia	Village Basharo P/O Ziarat TalashCNIC NO 15302-9478295-6	99.26	GGMS Sohgalay	---do--	---do--
3.	2430261	Naila Begum	Village & P/o Saddo Timergara CNIC No.15302-9329221-4	99.21	GGHS Bishgram	---do--	---do--
4.	24302565	Seema Gull	Village & P/O OdigramCNIC NO.15302-3643756-6	98.78	GGMS Lajbook	---do--	---do--
5.	2430297	Adila	CNIC NO 15705-3067303-2	97.31	GGMS Khali Colony	---do--	---do--
6.	2430186	Nageena Begum	Village Soghalay P/O Ziarat Talash	97.25	GGMS Hanfia	---do--	---do--
7.	2430150	Khashia Begum	Village & P/O munjai CNIC NO 15705-4756428-2	96.71	GGMS Daroo Maidan	---do--	---do--
8.	2430285	Saima	Village Ghari P/O chakdaraCNIC NO.15307-8729289-4	94.77	GGHS Inzaro	---do--	---do--
9.	2430284	Ghazala Naz	Village Gull Muqam P/O Chakdara:CNIC NO 15307-5229466-6	93.95	GGMS Dara Ramora	---do--	---do--
10.	2430144	Sumaira Bibi	Village & P/O Hayaserai	93.14	GGHS Zimdara	---do--	---do--
11.	2430226	Alia Begum	Bandagai CNICNO 15322-2229288-4	92.66	GGMS Sadbar Kalai	---do--	---do--

Dir Lower Female Regularization Order DM Adhoc

12.	2430182	Ruqia Begum	Village & P/O Khall CNIC NO15705-8621962-6	92.62	GGMS Seer Tormang	---do--	---do--
13.	2430138	Fazilat	Village & P/O Shawa CNIC NO. 15307-9010867-8	91.73	GGMS Jango	---do--	---do--
14.	2430176	Taj Begum	Village & P/O Danwa 15302-0611391-8	90.99	GGMS Saligram	---do--	---do--
15.	2430122	Nahida Begum	Village Palso Dog P/O Khazana CNIC NO 15304-2248300-0	90.93	GGMS Maskani	---do--	---do--
16.	2430282	Malak Fakhra Naz	Village Chargorai P/O Balambat CNIC NO. 15306-4043319-6	89.63	GGMS Atto	---do--	---do--
17.	2430268	Zainab Begum	Village Hkhema P/O Timergar CNIC NO 15302-8027466-6	88.96	GGMS Shal Kandai	---do--	---do--
18.	2430168	Bushra Ghafoor	Village & P/O Timergara	88.74	GGMS Adam Dheri	---do--	---do--
19.	2430229	Rukhsana Nasir	Village & P/O Timergara 3740525497494	88.73	GGHS Beyarai	---do--	---do--
20.	2430181	Uzma Sundass	Village & P/O Saddo CNIC No. 15302-7397674-0	88.69	GGHSS Samarbagh	---do--	---do--
21.	2430263	Faiza Faiz	Village & P/O manyal CNIC NO 15305-1945068-8	87.26	GGMS Kando Machla	---do--	---do--
22.	2430257	Hidayat Begum	Village & P/O Munda 15304-9374531-0	86.78	GGMS Hdheri Kambat	---do--	---do--
23.	2430219	Shazia Aziz	Village & P/O Khungai CNIC NO . 15302-9846620-6	86.39	GGHS Moranai	---do--	---do--
24.	2430228	Ghausia Khan	Village Pito P/O Khungai CNIC. 15302-5510990-2	84.68	GGMS Khair Abad	---do--	---do--
25.	2430147	Shabina Saeed	Village & P/O Tindodog CNIC NO 15307-1885545-8	84.62	GGMS Mator	---do--	---do--
26.	2430296	Salma Israr	Village Gull Muqam P/O Chakdara CNIC NO. 15307-8179494-8	84.37	GGMS Bagh Kandai	---do--	---do--
27.	2430160	Lubna Begum	Village & P/O Haji Abad CNIC NO. 15306-8286319-2	82.29	GGHS Manyal	---do--	---do--
28.	2430172	Salma Bibi	House No-151 Muhalla Mufi Abad Peshawar CNIC NO. 17301-8840503-2	82.16	GGMS Markhani	---do--	---do--
29.	2730115	Abida	Village Mohalla Dellie Mardan CNIC NO. 15306-2148991-4	81.69	GGMS Likor Kambat	---do--	---do--
30.	2430175	Uzma Baig	Village & P/O Mian Banda Timergara CNIC NO 15302-2944202-6	81.61	GGMS Toormang	---do--	---do--
31.	2430264	Saman Huma	Village & P/O Timergara CNIC NO. 15306-7995766-4	80.98	GGMS Bandai Maidan	---do--	---do--
32.	2430234	Saiqa	Village Tora Tiga P/O timergara CNIC NO. 15302-16512088	80.46	GGMS Tekni Bala	---do--	---do--

Dir Lower Female Regularization Order DM Adhoc

33.	2430166	Nagina Bibi	Village Khan Sari P/O Ziarat Talash CNIC NO. 15302-0383264-0	78.37	GGMS Terona	---do--	---do--
34.	2430286	Shabina bibi	Village chino Talash P/O Ziarat Talash CNIC NO. 15302-7326855-8	78.51	GGMS Galkor Luqman Banda	---do--	---do--
35.	2432016	Shaheen Kanwal	Village & P/O Khanpur CNIC NO 15307-11177334-	77.74	GGHS Tali Sai	---do--	---do--
36.	2430214	Uzma Bibi	Village & P/O Balambat CNIC NO. 15302-5068509-0	77.44	GGMs Shagai	---do--	---do--
37.	2430210	Tauheed Ahmad	Village Palo Shah P/O chakdara CNIC NO 15307-4734906-4	71.21	GGMS Bomboli	---do--	---do--

DM-2015

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointm ent order- No and dated	Extension order No and dated if any
1.	891200039	HAMEEDA BEGUM	TEHSIL BALAMBAT P/O TIMERGARA CNIC. 15306-8704153-8	110.41	GGMS MusaAbad	E/No 997-1000 Date 14-3-2015	2035-38 dated: 15-05-2017
2.	891200083	ROBINA SALMA RAHMAN	VILLAGE AND POST OFFICE SADDO TEH TIMERGARA CNIC 15302-142292-2	107.97	GGMS Dehrai	---do--	---do--
3.	891200037	NERGUS BEGUM	VILLAGE AND POST OFFICE KHALL TEHSIL BALMBAT DISTRICT LOWER DIR CNIC 15705-9403607-6	107.01	GGMS Babagam	---do--	---do--
4.	891200063	SUNDAS HANIF	VILLALGE P/O SADOTEHSIL TIMARGARA DISTRICT DIR LOWER cnic. 15302-2012188-4	105.45	GGMS Gaddar	---do--	---do--
5.	891200022	SHABANA	MALAK ABAD CHARAPRI TEHSIL BALAMBAT DISTRICT LOWER DIR CNIC 15302-5336488-0	101.65	GGMS Mina Batan	---do--	---do--
6.	891200031	MEHNAZ AKHTAR	DISTRICT LOWER DIR TEHSIL TIMEERGARA POST OFFICE TMG SANA ELECTRIC STORE NEAR GENERAL BUS STAND DISTRICT LOWER DIR CNIC 15302-5398788-4	101.1	GGHS Mian Barngola	---do--	---do--
7.	891200103	SUMERA	C O UK MOBILE ZONE MAIN BAZAR SAMAR BAGH DISTRICT LOWER DIR	100.84	GGMS Beroo	---do--	---do--
8.	891200006	FAZEELAT	VILLAGE CHINO TALASH	100.57	GGMS Band	---do--	---do--

Dir Lower Female Regularization Order DM Adhoc

		BIBI	Talash Dir Lower CNIC 15302-4991397-8		Ouch		
9.	891200047	ROBINA BEGUM	KHAZANA TEHSIL MANDA DISTRICT LOWER DIR cnic.15304-2671064-0	98.18	GGMS Banda Talash	---do--	---do--
10.	891200003	SHABANA UZMA	CARE OF AZAM PRINTING PRESS TIMERGARA TIMERGARA CNIC 15302-4678449-4	97.72	GGHS Damtal	---do--	---do--
11.	891200099	SANAM	CHARGORI MALAKABAD TEHSIL BALAMBAT	96.46	GGHS Tawda China	---do--	---do--
12.	891200034	ASMA SHEHZADI	VILLAGE DARBAR POST OFFICE CHADARA TEHSIL ADENZAI DIR LOWER CHAKDARA	94.18	GGMS LARAM	1864-67 Dated: 24-04-2015	2108-11 Dated: 17-05-2017
13.	891200098	DILSHAD BEGUM	VILLAGE MIAN BANDA P/O AND TEHSIL TIMERGARA DISTT DIR LOWER C/O M. JAN ENERPRISES OPP DHQ HOSPITAL TIMERGAR CNIC 15302-2336450-8	94.07	GGMS SANGOLAI	---do--	---do--
14.	891200052	NAZIA ALAM	MOHALLAH BILAL KALONY VILLAGE OUCH GHARBI TEHSIL ADENZAI DISTRICT LOWER DIR CNIC 15307-7066499-6	89.41	GGMS BOCHAKAY	---do--	---do--

DM-2016

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointm ent order No and dated	Extension order No and dated if any
1.	891200070	ASMA GUL	TEHSIL BALABAT P.O TIMERGARA LOWER DIR CNIC 15302-6058730-2	98.31	GGMS Narai Tangi	888-91 dated: 05-03-216	1231-34 dated: 18-04-2017
2.	791200003	FOUWZIA BEGUM	MIAN BANDA, TEHSIL TIMERARA DIR LOWER CNIC 15302-7776893-0	88.34	GGMS Darmal Payeen	---do--	---do--
3.	891200017	NASMA NOOR	MALAKAND PAYEEN TEHSIL BALAMBAT DIR LOWER CNIC 15302-7370327-0	86.17	GGMS Safaray Maidan	---do--	---do--
4.	891200025	SHABANA DARSHKHA NDA	Haji SAIDA GUL AND SONS PLASTIC STORE BALAMBAT ROAD TIMERGARA CNIC 15302-6058768-6	85.60	GGMS GALL	1998-2001 dated 25-04-2016	1235-38 dated: 18-04-2017



DM-2017

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
1.	8912000047	NAFEESA SARDAR	FRIENDS MEDIAL STORE SDAMAR BAGH ROAD MUNDA DIR LOER DIR	111.56	GGHS MUNDA	No: 932-38 dated: 28/03/2017	
2.	8912000071	AZRA BEGUM	JAN AMIR DRY FURIT MAIN ADA TIMERGARA DISTRICT LOWER DIR	110.42	GGMS BARKHAN AY	---do---	
3.	8912000118	AZRA SARDAR	MUHAMMD REHMAN BOOK DEP TEMOEUR PLAZA OPPOSITE MN MARKET MAIN BAZAR TIMERGARH LOWR DIR	107.16	GGMS KOTKAY MAIDAN	---do---	
4.	8912000083	NASRA SULTAN	VILLAGE AND POST OFFICE MAINA BATHAN TEHSIL ADENZAI DISTRICT LOWER DIR	106.14	GGMS OUCH MIANA	---do---	
5.	8912000045	SUMAIRA BIBI	VILLAGE NAWAY KALAY TALASH TEHSIL TIMERGARA DIR LOWE RPOST OFFICE NASAFA	102.73	GGMS AJOO	---do---	
6.	8912000043	ASIA	MOHALLA BILAL COLONY VILLAGE AND POST OFFICE OUCH LOWER DIR	100.76	GGMS KOWARO MANAI	---do---	
7.	8912000064	SEEMA	HOUSE NUMBER 151 MULAHHAL MIFTI ABDUL LATIF OUT SIDE BAJORI GATE PESHAWAR	99.88	GGMS DALGRAM	---do---	
8.	8912000033	PUKRAJ	ALSWHAT LABORTRY AZHAR MEDICAL AN DSERYCIAL CENTER TIMERGARA LOWER DIR	93.84	GGMS DARMAL BALA	---do---	
9.	8912000099	GHAZALA ANJUM	CHAKDARA MOHALLAH DISTRICT LOWER DIR	95.18	GGMS AJABAY	2805-11 dated: 13-05-2017	

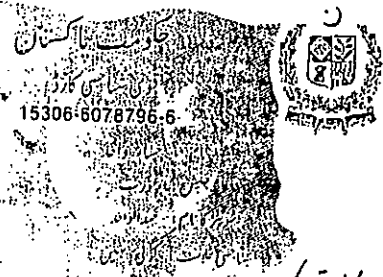
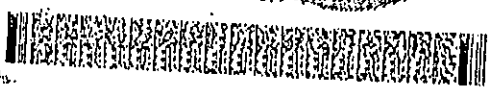
**TERMS & CONDITIONS.**

1. *The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resign from service and also not for those who are under disciplinary proceedings.*
2. *They will be governed by such rules and regulations as may be issued from time to time by the Govt.*
3. *The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa*

TP085Z 15306-6078796-6



04/01/2023 04/01/2019



15306-6078796-6

01/01/1986

وہجور ہسٹوریکل

# District Education Officer (F) Dir Lower

19

PH No. 0945-9250082,

E-mail emisdirlower@yahoo.com



## OFFICE ORDER:

Consequent upon the recommendation / approval of the District Selection Committee / District Promotion Committee Dir Lower in its meeting held on 10/10/2014, the following DM (Female) (School based) are hereby appointed in BPS-15 (Rs.8500-7029500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

S#	Name	Father Name	Address	Name of School	Score
1	SHEHLA BIBI	SahibZada Naveed Anjum	Village: and P.O Hayasari.	GGMS KHAN ABAD	101.16
2	NODHA	Siraj Uddin	Village: Basharo, P.O Ziarat Talash.	GGMS Soghalay	99.26
3	NAILA BEGUM	Gul Nawaz Khan	Village: & P.O Saddo, Timergara	GGHS BISHEGRAM	99.21
4	SEEMA GUL	Muhammad Nawaz Khan	Village: & P.O Odigram.	GGMS LAJBOOK	98.78
5	ADILA	Fazal Qahar	Village: Safary P.O Khall.	GGMS Khall Colony	97.31
6	NAGEENA BEGUM	Rahman Uddin	Village: Soghalay P.O Ziarat Talash	GGMS HANFIA	97.25
7	KHASHIA BEGUM	Irfan Ullah	Village: & P.O Munjai.	GGMS DAROO MAJAN	96.71
8	SAIMA	Altaf Hussain	Village: Moh: Ghari P.O Chakdara.	GGHS INZARO	94.77
9	GHAZALA NAZ	Fateh Khan	Village: Gul Muqam P.O Chakdara.	GGMS Dara Ramor.	93.95
10	SUMAIRA BIBI	Gul Sahib Zada	Village: & P.O Hayasari	GGHS Zaimdara	93.14
11	ALIA BEGUM	Gul Nawaz Khan	Village: Shago Kass, P.O Bandagui	GGMS SADBAR KAI	92.66
12	RUQIA BEGUM	Zainul Abidin	Village: & P.O Khall	GGMS Seer Tormai	92.62
13	ASMA SHAHZADI	Abdul Ghafar	Village: & P.O Chakdara.	GGHS Tawda China	92.18
14	FAZILAT	Muhammad Salar	Village: & P.O Shawa	GGMS JANGO	91.73
15	TAJ BEGUM	Mohammad Karim	Village: & P.O Danwa	GGMS Saligram	90.99
16	NAHIDA BEGUM	Khan Mula Khan	Village; Paloso Dog P.O Khazana	GGMS Maskini	90.93
17	MALAK FAKHRA NAZ	Malak Wazir Zada	Village; Chargori P.O Balambat	GGMS ATTO	89.63
18	FAZEELAT BIBI	Muhammad Wali	Village: Chano P.O Ziarat Talash	GGMS NIMAZ KOT	89.44
19	ZAINAB BEGUM	Muhammad Zamin Khan	Village; Khema P.O Timergara	GGMS SHAL KANDI	88.96
20	BUSHRA GHAFOR	Muhammad Chafoor Khan	Village; & P.O Timergara	GGMS Adam Dheri	88.74
21	RUKHSANA NASIR	Nasir Ul Maq	Village; & P.O Timergara	GGHS BEYARI	88.73
22	UZMA SUNDASS	Naveed Ahmad	Village; & P.O Saddo.	GGHSS SAMARBAGI	88.69
23	FAIZA FAIZ	Faiz Muhammad	Village; & P.O Manjal	GGMS KANDO MAC	87.76

**Intikhab Photo Store**  
Near National Bank Colony,  
Balambat Chowk, Timergara.  
Ph: 0945-822994. Mob: 0300-9398707

*[Handwritten signature]*

25	HIDAYAT BEGUM	Fateh Muhammad	Village; & P.O Munda	GGMS DHERI KAM	T	86.78
26	SHAZIA AZIZ	Aziz Ullah	Village; & P.O Khungi	GGMS Moranai		86.39
27	SHABINA SAEED	Qareeb Ullah Khan	Village; Pito P.O Khungi	GGMS KHAIR ABA		84.68
28	SALMA ISRAR	Saeed Khan	Village; & P.O Tindodog.	GGMS MATOOR		84.62
29	LUBNA BEGUM	Muhammad Israr	Village; Gul Muqam P.O Chakdara.	GGMS Bagh Kandi		84.37
30	SALMA BIBI	Mubarak Said	Village; & P.O Haji Abad.	GGMS MANYAL		82.29
31	JAMILA BIBI	Fath Ur Rehman	House No. 151 Muhalla Mufti Abad Peshawar.	GGMS MARKHANI		82.16
32	JAMILA BIBI	Shah Zamin Khan	Village; Khan Sari P.O Zairat Talash	GGMS BARKHANA		81.95
33	ABIDA	Mohibullah	Village; Mohalla Dellie, Mardan.	GGMS LIKOR KAM	T	81.69
34	UZMA BAIG	Amin Ul Haq	Village; & P.O Mian Banda	GGMS Toormang		81.61
35	SAMAN HUMA	Muzafar Said	Village: P.O Timergara	GGMS BANDAI MAIDAN		80.98
36	SAIQA	Shah Sawar	Village; Tora Tiga P.O Timergara	GGMS Tekni Bala		80.46
37	NAGINA BIBI	Amir Baz Khan	Village; Khan Sari P.O Zairat Talash	GGMS Terona		78.87
38	SHABINA BIBI	Muhammad Wali	Village; Chino Talash P.O Zairat Talash	GGMS GALKOR LUQMAN BANDA		78.51
39	SHAHEEN KANWAL	Riaz Muhammad	Village; & P.O Khanpur.	GGMS Tali Sia		77.74
40	UZMA BIBI	Sher Zaman Khan	Village: & P.O Balambat	GGMS Shagai		77.44
41	HINA BEGUM	Abdur Rauf	Village; & P.O Timergara	GGMS GALL		75.08
42	TAUID AHMAD	Ahmad Habib Ullah	Village; Palo Shah P.O Chakdara	GGMS Bambor		71.21

TERMS AND CONDITIONS:

1. This order will commence from 01/11/2014 and shall continue til 31/10/2015 and this offer will, however, not construe in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
2. They will be entitled to emoluments of Rs. Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract per month for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
3. Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
4. They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
5. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rule framed from time to time.
7. Their appointment will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
8. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
9. NO TA/DA will be paid to them on joining the post.
10. Their age may not exceed 35 years or below 18 years.
11. Charge reports should be submitted to all concerned,

**Intikhab Photo State**  
 Near National Bank Colony,  
 Balambat Chowk, Timergara.  
 Phone: 822994, Mob: 0300-9398707

- 12. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
- 13. This order is issued, errors and omissions accepted, as a notice only.
- 14. 40 % candidates have been initially recruited from amongst those candidates who have qualified NTS test for the purpose purely on merit.

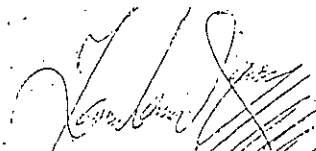
(Zaib Un Nisa)  
 District Education Officer (F)  
 District Dir Lower

Endst. No. 3690-93

Dated Timergara the 01/11/11 A.M.

Copy of the above is forwarded to:

- 1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. The Principals / Headmistresses of the institute concernd.
- 4. The Offcails concernd.

  
 District Education Officer (F)  
 District Dir Lower

**Inulkitab Photo State**  
 Near National Bank Colony,  
 Balambat Chowk, Timergara.  
 Ph: 0945-822994, Mob: 0300-9398707

To  
 The DEO (F) ESFD  
 at Timarpur Dist (L)  
 Subject :- Absence report of Hina Begum (DM)  
 GMS Cal Maldan.

Respected Madam,

It is requested that  
 one Mrs Hina Begum (DM) is absent  
 since 18-11-2014 till this day 09-12-2014  
 Nothing is known to me about  
 her in verbal or in written form.

Therefore, she is reported for  
 necessary action against her.

*Smal An*  
 DISTRICT EDUCATION OFFICER (F)  
 DISTRICT OFFICE

*T. Begum*  
 HEAD MISS  
 G.M.S. Cal Maldan  
 Dist. Lir Lowa.  
 9/12/2014



**~~District Education Officer (F) Dir Lower~~**

Ph: # 0945-9250083

E-mail;- deofdirlower@yahoo.com

**OFFICE ORDER**

The Appointment order in respect Mst, Hena Begum D/O Abdur Rauf DM GGMS Gal Maidan at S.No. 40 is hereby withdrawn due to remained will full absent from duty from the date of taking over charge being a contract/Adhoc appointee for a period of one year w.e.f. 01/11/2014 to 31/10/2015.

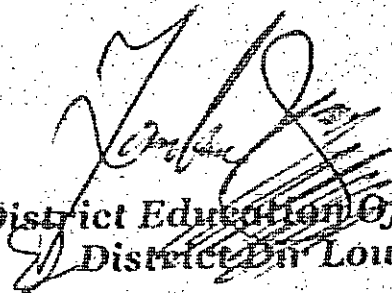
(Zaibun Nisa)  
District Education Officer (F)  
District Dir Lower

Endst: No. 2313-16

Dated Timergara the: 09 /05/2015.

Copy of the above is forwarded to:

1. The District Account Officer Dir Lower.
2. The Incharge GGMS Gall Maidan Dir Lower.
3. The Local Accountant DEO (F) Dir Lower.
4. The Official concerned.

  
District Education Officer (F)  
District Dir Lower