

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 4993/2021

Date of Institution ... 04.05.2021

Date of Decision ... 10.11.2021

Shamim Bibi D/o Spin Gul Ex-Pst R/o P/O Bagan Qoom, Watizai Tehsil Lower Kurram.
District Kurram. ... (Appellant)

VERSUS

The Director Elementary & Secondary Education merge Area Khyber Pakhtunkhwa
Peshawar and two others. ... (Respondents)

Miss Roeeda Khan,
Advocate

... For Appellant

Mr. Muhammad Rasheed,
Deputy District Attorney

... For Respondents

SALAH-UD-DIN ...

MEMBER (JUDICIAL)

ATIQ-UR-REHMAN WAZIR ...

MEMBER (EXECUTIVE)

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):-

This single judgment shall

dispose of the instant service appeal as well as the connected service appeal bearing No. 4994/2021 "titled Parveen Bibi Vs Director Elementary & Secondary Education Merged Area Khyber Pakhtunkhwa Peshawar and two others" as common question of law and facts are involved therein.

02. Brief facts of the case are that the appellants Shamim Bibi and Parveen Bibi were appointed as primary school teacher (PST) on 28-05-2010 and 23-05-2010 respectively. During the course, both were selected to the post of Drawing Master (DM) on 15-01-2013, which order was rescind vide order dated 11-12-2015. The appellants were re-adjusted against their original posts of PST vide

order dated 20-11-2020. After their adjustment against their respective posts of PST, one Mr. Khadim Hussain lodged a complaint against re-adjustment of both the appellants as PST, upon which an inquiry committee was constituted and in light of recommendations of the inquiry report, adjustment order dated 20-11-2020 of both the appellants was withdrawn vide impugned order dated 19-04-2021. Feeling aggrieved, both the appellants preferred departmental appeals dated 28-04-2021, which were rejected vide orders dated 30-04-2021, hence the instant service appeals with prayers that both the impugned orders dated 19-04-2021 and 30-04-2021 may be set aside and the appellants may be re-instated in service with all back benefits.

03. Learned counsel for the appellants has contended that the impugned cancellation/withdrawal orders and rejection of departmental appeals dated 19-04-2021 and 30-04-2021 respectively are illegal as the same has been passed without fulfilling the codal formalities; that there is no proof or evidence in respect of the allegations leveled against the appellant in the inquiry report as well as in the impugned orders, hence are liable to be set aside; that the inquiry officer did not bother to record statement of witnesses and complainant in presence of the appellants, nor the appellants were afforded opportunity to cross-examine witnesses; that no reference of law has been mentioned in the impugned orders as well as in the inquiry report, which is illegal and unlawful; that no charge sheet/statement of allegations or any show cause notice was served upon the appellants and the appellants were condemned unheard.

04. Learned Deputy District Attorney for the respondents has contended that the appellants were initially appointed as PST and later on appointed as DM, but upon recommendations of oversight committee, the appellants were terminated from the post of DM due to the reason that they were lacking in professional qualification of diploma in drawing; that the appellants requested for their adjustments against their original posts of PST, which however was not acceded

to due to the reason that there was no vacant post at that time, as other similarly placed employees were adjusted against such post vide order dated 06-06-2016; that after availability of posts, the appellants were re-adjusted against their original posts of PST vide order dated 20-11-2020, but upon submission of a complaint against re-adjustment of the appellants, an inquiry committee was constituted and the inquiry committee found that their appointment orders as PST seems to be doubtful, hence their re-adjustment order dated 20-11-2020 was withdrawn.

05. We have heard learned counsel for the parties and have perused the record.

06. Record reveals that both the appellants were initially appointed as PST vide orders dated 28-05-2010 and 23-05-2010. During the course, both the appellants were appointed as DM vide order dated 15-01-2013. An over sight committee was constituted, which had declared some of the teaching/non teaching staff in lower and central Kurram including the appellants as ineligible Vide order dated 11-12-2015. Instructions were also issued to the ex-agency education officer to adjust the terminated in-service teachers against their original posts occupied before their appointment to the higher posts. To this effect a batch of four teachers was adjusted vide order dated 05-06-2016, but the appellants were kept on waiting and the appellants had submitted numerous applications for their adjustment against their original post. Finally both the appellants were re-adjusted as PST against their original posts vide order dated 20-11-2020, but after their adjustment, one Mr. Khadim Hussain lodged a complaint against such adjustment, upon which a fact finding inquiry was conducted and the inquiry committee found that their initial appointments seems to be doubtful, which is required to be cleared from the appointing authority, but the respondents without conducting a regular inquiry and without affording opportunity of defense to the appellants, had withdrawn their adjustments orders

as PST vide impugned order dated 19-04-2021 mere on the basis of suspicion, which however was not warranted, as it is a well settled legal proposition that regular inquiry is must before imposition of major penalty, which however was not done in case of the appellants. We are conscious of the fact that responsibility of appointments of the appellants as PST and later on as DM squarely falls upon the shoulders of the respondents and there was no fault of the appellants in being adjusted as PST with or without adopting proper procedure, it would therefore be wholly unjust and unfair, if they were made to suffer for the follies and indolence of ^{their} ~~his~~ superiors, after a lapse of considerable time, where the appellant having been served for quite longer time could not be denied their rights accrued to them. It is also an established legal proposition that once a right was accrued to a civil servant, the same could not be taken away on mere assumption, supposition, whims and fancy of an executive authority. Such rights once vested, could not be destroyed or withdrawn, as legal bar would come into play under the doctrine of locus poenitentiae. Reliance is placed on 2015 SCRM 1418.

07. We are of the considered opinion that the appellants has not been treated in accordance with law and have been dealt with unlawfully, hence the impugned orders dated 19-04-2021 and 30-04-2021 are set aside and the appellants are re-instated in service with all back benefits. Parities are left to bear their own costs. File be consigned to record room.

ANNOUNCED
10.11.2021



(SALAH-UD-DIN)
MEMBER (J)



(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)


ORDER
10.11.2021

Miss Roaeda Khan, Advocate for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal as well as connected Service Appeal bearing No. 4994/2021 "titled Parveen Bibi Versus The Director Elementary & Secondary Education merge Area Khyber Pakhtunkhwa, Peshawar and two others", the impugned orders dated 19-04-2021 and 30-04-2021 are set aside and the appellants are re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
10.11.2021


(SALAH-UD-DIN)
MEMBER (J)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

25.06.2021

Counsel for the appellant presents Preliminary arguments heard on account of engagement of learned counsel for the appellant in Hon'ble Peshawar High Court today points raised need consideration. The appeal is admitted to regular hearing. 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 in office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 10.11.2021 before the D.B.

Appellant Deposited
Security & Process Fee

28/6/21


Chairman

Form- A

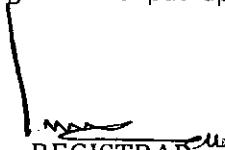

FORM OF ORDER SHEET

Court of _____

Case No.-

4993

/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/05/2021	<p>The appeal of Mst. Shamim Bibi resubmitted today by Roeda Khan 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-	27/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on 25/06/21</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Shamim Bibi d/o Spin Gul r/o Ex-PST District Kurram received today i.e. on 04.05.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of the appellant is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures-F, K and L of the appeal are illegible which may be replaced by legible/better one.


No. 768 /S.T,

Dt. 04/05 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Roeeda Khan Adv. Pesh.

objection No 1 & 2
has been removed


6/5/2021

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

Service Appeal No. _____ of 2021

Shamim Bibi

VERSUS

The Director Elementary & Secondary Education Merge Area KPK
Peshawar & Others.

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Grounds of Appeal		1 To 6
2.	Affidavit		7
3.	Address of the parties		8
4.	Copy of appointment order, service book, service certificate & pay slip	A, B, C, D	9 To 17
5.	Copy of promotion order dated 1/01/2013 and termination order dated 11/12/2015	E, F	18 To 20
6.	Copy of further proceeding order and appointment order of other colleagues	G, H	21 To 22
7.	Copy of application further proceedings orders & order dated 18/05/2017	I, J, J1 & K	23 To 26
8.	Copy of application, further proceeding order & application dated 14/10/2020	L, M, N	27 To 29
9.	Copy of appointment order dated 20/11/2020	O	30
10.	Copy of inquiry report & cancellation order dated 19/04/2021	P, Q	31 To 32
11.	Copy of Departmental appeal & rejection order	R, S	33 To 36
12.	Wakalat Nama		

(S) Shamim Bibi Appellant
Through

(R) Roeda Khan

Advocate, High Court Peshawar.

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

Service Appeal No. 4993 of 2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 5210

Dated 04/15/2021

Shamim Bibi D/O Spin Gul Ex-Pst R/o P/O Bagan Qoom,
Watzai Tehsil Lower Kurram District Kurram.

..... Appellant

VERSUS

- 1) The Director Elementary & Secondary Education merge Area
KPK Peshawar.
- 2) The District Education officer District Kurram.
- 3) The Additional District Education Officer Sadda District
Kurram.

..... Respondents

**APPEAL U/S 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED CANCELLATION/WITHDRAWN
ORDER DATED 19/04/2021 WHEREBY THE
SERVICE OF THE APPELLANT HAS BEEN
CANCELLED/WITHDRAWN WITHOUT ANY
REASON AGAINST WHICH THE APPELLANT
FILED DEPARTMENTAL APPEAL ON 28/04/2021
WHICH HAS BEEN REJECTED ON 30/04/2021
ON NO GOOD GROUNDS.**

Filed to-day

Registrar

04/05/2021

Re-submitted to -day
and filed.

Registrar

6/5/2021

Prayer:

On acceptance of this appeal both the impugned order dated 19/04/2021 and 30/04/2021 may kindly be set aside and the Appellant may kindly be reinstated in her service along with all back benefits. Any other remedy which this august Tribunal deems fit that may also be onward granted in favor of Appellant.

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The appellant submits as under:

- 1- That the appellant has been appointed as PST on 28/05/2010 and after appointment the Appellant performed her duty regularly and with full devotion and hard work and no complaint whatsoever has been made against the Appellant. (Copy of appointment order, service book, service certificate and pay slip is attached as Annexure-A, B, C & D).
- 2- That the appellant has been promoted to DM Post on 15/01/2013 and later on, on dated 11/12/2015 the service of the Appellant as a DM has been terminated without any reason. (Copy of the promotion order dated 15/01/2013 & termination order dated 11/12/2015 is Attached as E & F).
- 3- That after the said termination order the Appellant has been submitted an application to Respondent Department for her appointment on her previous post as PST which has been forwarded for further proceedings but in vain while other colleagues of the Appellant has been appointed/adjusted as PST in 2016 through Departmentally and the Appellant has not been adjusted which is a clear cut discrimination on part of Respondent Department. (Copy of further proceeding order and appointment order of other colleagues is attached as Annexure G & H).

4- That after that the Appellant submitted an application on 13/10/2016 to Respondent Department for her adjustment which is forwarded for further proceedings and on response of which the direction of eligibility and similar treatment according to other colleagues has been issued to the Appellant as PST on 18/05/2017 but instead of the said direction the Appellant has not been appointed/adjusted on the ground of the said order dated 18/05/2017. (Copy of application, further proceeding order and order dated 18/05/2017 is attached as Annexure-I, J, J1 & K).

5- That due to the reason mention in para-4 the appellant submitted in application to Respondent Department for her adjustment in response of which the Appellant has been stated that the said post has been filled with Court orders wait for vacant post and forwarded the said application for further proceedings and after that the Appellant submitted another application for her adjustment/appointment on 14/10/2020. (Copy of application & further proceeding order & application dated 14/10/2020 is attached L, M & N).

6- That on response of the said application dated 14/10/2020 the Appellant has been appointed as PST by the Respondent Department on 20/11/2020 and after appointment performed her duty regularly

and with hard work. (Copy of appointment order dated 20/11/2020 is attached as Annexure-O).

- 7- That on 19/04/2021 without providing opportunity of defense to the Appellant an improper inquiry has been conducted on the ground of which the service of the Appellant has been cancelled/withdrawn by the Respondent Department on 19/04/2021 without any reason. (Copy of inquiry report & cancellation order is attached as Annexure-P & Q).

- 8- That the Appellant submitted a Departmental appeal on 28/04/2021 against the impugned order dated 19/04/2021 which has been rejected on 30/04/2021 on no good grounds. (Copy of Departmental appeal and rejection order is attached R & S).

- 9- That feeling aggrieved the Appellant preferred the instant service appeal before this Hon' able Tribunal on the following grounds inter alia.

Grounds:

A) That the impugned cancellation/withdrawn order dated 19/04/2021 and 30/04/2021 of the Respondent Department issued against the Appellant has been void and illegal because it has been passed without fulfilling the codal formality.

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- B) That the cancellation order of service is also illegal because there is no illegality on part of the Appellant.
- C) That there is no prove and evidence regarding the allegation level against the Appellant in the inquiry report as well as in the impugned orders.
- D) That no statement of any witness and complainant has been recorded by the inquiry officer.
- E) That no reference of any law and provision has been mention in the impugned order as well as in the inquiry report.
- F) That no show cause notice no charge sheet has been issued before passing the impugned order.
- G) That no opportunity of defense and personal hearing has been provided to the Appellant.
- H) That no final show cause notice has been issued before issued the impugned order dated 19/04/2021.
- I) That the Respondent Department has also been committed discrimination.

It is therefore, most humbly prayed that on acceptance of this appeal both the impugned order

(b)

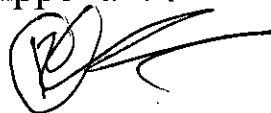
dated 19/04/2021 and 30/04/2021 may kindly be set aside and the Appellant may kindly be reinstated in her service along with all back benefits.

Any other remedy which this august Tribunal deems fit that may also be onward granted in favor of Appellant.

Dated 04/05/2021



Appellant.

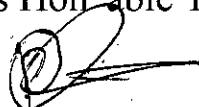


Through

Roeeda Khan Advocate
High Court Peshawar

Note:

As per information furnished by my client no such like appeal for the same Petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'able Tribunal.



Advocate

7

BEFORE THE HONABLE SERVICE TRIBUNAL
PESHAWAR

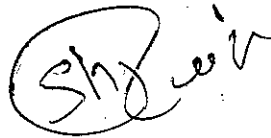
Shamim Bibi D/O Spin Gul R/o Ex-Pst District Kurram.
..... Appellant

VERSUS

The Director Elementary & Secondary Education merge Area
KPK Peshawar & others.

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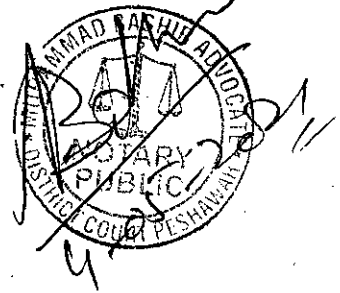
Shamim Bibi D/O Spin Gul R/o Ex-Pst District Kurram., do
hereby solemnly affirm and declare that all the contents of the
instant appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed from this Hon' able
Court.



DEPONENT

Identify By 
Roeda Khan
Advocate High Court Peshawar

ATTESTED



8

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

Service Appeal No. _____ of 2021

Shamim Bibi D/O Spin Gul R/o Ex-Pst District Kurram.
..... Appellant

VERSUS

- 4) The Director Elementary & Secondary Education merge Area
KPK Peshawar.
- 5) The District Education officer District Kurram.
- 6) The Additional District Education Officer Sadda District
Kurram.

..... Respondents

APPELLANT

THROUGH

**ROEEDA KHAN ADVOCATE
HIGH COURT PESHAWAR**

"A" (9)

OFFICE ADD: AGENCY EDUCATION OFFICER SADDA KURRAM AGENCY

APPOINTMENT

Consequent upon the approval by the selection committee. The appointment of the following PTC Female teachers is hereby ordered in the school noted against her names against vacant PTC posts purely on Temporary basis in BPS No7/BPS 9 if passed FA/FSc in 2nd division plus usual allowances as admissible under the rules with effect from the date of her taking over charges.

S.#	Name of Candidate/Father Name	School where Appointe	Remarks
1	Shamim bibi D/O Spin Gul	GGPS Said Karam Cental Kurram Agency	Against Vacant Post

TERMS/CONDITIONS.

1. She is directed to produce her Medical certificate from the Medical supdt: AIQ Hospital Parachinar.
2. Their age should be between 18-33 years 18-40 for Female.
3. Her appointment is purely made on temporary and contract basis
4. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the Issuing Authorities concerned.
5. If she failed to take over charge within 15 days, his appointment will automatically be considered as cancelled.
6. Charge reports should be submitted to this office.
7. Has appointment will be consider as regular but without pension/gratuity on the terms of section -15 of the NWFP Civil Servant Act 1973 as amended with civil Servants amended with civil Servants amendement act 2003 but will be entitled to contribution provident Fund at such rate as may be prescribed by the govt

[Signature]
 Add: Agency Education Officer
 Sadda Kurram Agency.

o 1169-72 /Edu Dated 28/5 /2010

Copy Forwarded to the:-

- Director of Education FATA NWFP Peshawar.
- Asstt: Political Agent Central Kurram Sadda.
- Agency Account Officer Parachinar.
- Headmaster concerned.
- Office file.

AIQ/1001
BY

[Circular Stamp]

[Signature]
 Add: Agency Education Officer
 Sadda Kurram Agency.

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Name of Post	Whether Substantive of officiating any whether permanent or temporary	It officiating state. (1) subatative appointment of (ii) whether service counts for pension under rule 3-20 C.S.R. (Pb) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of government servant
	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو رول کے مطابق پیشین کا مستحق ہے؟	تختواہ بطور عارضی ملازمت	زائد تختواہ بطور قائم مقام	ماسوائے تختواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
			Rs. Ps.	Rs. Ps.			
① Passed (SSC Exam (A) 2007) under Roll No 724488 from BISE Kohat secured 627/900 marks.							
verified vide AAED office no 316/Edii dated 15/1/2013.							
BISE Kohat no 4204/sec/verify/SSC BISE K dated 22/3/2013							
② Passed (FA Exam (A) 2009) under Roll No 27550 from BISE Kohat secured 735/1100 marks.							
verified vide AAED office no 316/Edii dated 15/1/2013							
BISE Kohat no 1294/sec/verify/inter/BISE Kohat 5/4/2013							
③ Passed BA Exam (A) 2011 under Roll No 30763 from BISE KUST (Kohat) secured 311/550 marks.							
Registration no 2010-PCU-378. Result declared on 29/9/2011							
④ Passed P.T. exam (ATI 2010) under Roll No AC 640946. Registration no 09 AKM 00111 from Aioie Islam Abad secured 610/900 marks. Result declared on 07-07-2011							

(Signature)

1 Name of Post	2 Whether Substantive or temporary	3 It officiating state. (1) substantive appointment of (ii) whether service counts for pension under rule 3-20 C.S.R. (Pb) Volume ii	4 Pay in substantive position		5 Additional pay for officiating		6 Other emoluments falling under the term pay	7 Date of appointment	8 Signature of government servant
			Rs.	Ps.	Rs.	Ps.	ما سوائے تنخواہ دیگر الاوائس	تاریخ تقرری	دستخط سرکاری ملازم
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- do -		BDS12 (9055-60-28555)			11005			1/7/2015	SD
					11655			1/12/2015	SD
		BDS11 (1140-980-35140)			14340			1/7/2016	SD
					15140			1/12/2016	SD
- do -		BDS12 (13380-960-42120)			18120			1/7/2017	SD
					19680			1/12/2017	SD
					20040			1/12/2018	SD
					21000			1/12/2019	SD

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Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the Head of the office or other attesting officer	Reference to any recorded punishment of censure, or reward, or praised of the Government servants
					Period	Government to which debitable		
دستخط افسر مجاز	تاریخ انقطاع ملازمت 30/11/2010	وجہات انقطاع ملازمت ترقی جاز یا برطرفی	دستخط افسر مجاز	رضت کی نو عیت و معیار	چار ماہ تک کی رضت کے لے اوسط خواہ کا قہین		دستخط افسر مجاز	سزا یا جزا غیر مناسب کارکردگی کا ریکارڈ
<i>Nalwani</i> Add: A.E.O Sadda Kurram	30/11/2010		<i>Nalwani</i> Add: A.E.O Sadda Kurram				<i>Nalwani</i> Add: A.E.O Sadda Kurram	Appointed as p/c vide AEO office L & C Kurram No 1189-72 edu. Dated 28/5/2010 at 99 ps Said Kurram Central Kurram
<i>Official</i> Add: A.E.O Sadda Kurram	30/6/2011	pay revision	<i>Official</i> Add: A.E.O Sadda Kurram				<i>Official</i> Add: A.E.O Sadda Kurram	
<i>Official</i> Add: A.E.O Sadda Kurram	6/7/2011	Allowed PS 9 ps PTC	<i>Official</i> Add: A.E.O Sadda Kurram				<i>Nalwani</i> Add: A.E.O Sadda Kurram	
<i>Official</i> Add: A.E.O Sadda Kurram	30/11/2011	less than 6 months	<i>Official</i> Add: A.E.O Sadda Kurram				<i>Official</i> Add: A.E.O Sadda Kurram	Service Verification Service Verified from 29.5.2010 to 30-11-2010
<i>Official</i> Add: A.E.O Sadda Kurram	30/11/2012	Inc	<i>Official</i> Add: A.E.O Sadda Kurram				<i>Official</i> Add: A.E.O Sadda Kurram	
<i>Official</i> Add: A.E.O Sadda Kurram	30/11/2013	Inc	<i>Official</i> Add: A.E.O Sadda Kurram				<i>Official</i> Add: A.E.O Sadda Kurram	Service Verification Service Verified from 01-12-2010 to 30-11-2011
<i>Official</i> Add: A.E.O Sadda Kurram	1/12/2012	upgraded to 9/15					<i>Official</i> Add: A.E.O Sadda Kurram	
<i>Official</i> D.E.O Kurram	30/11/2013	Inc	<i>Official</i> D.E.O Kurram				<i>Official</i> Add: A.E.O Sadda Kurram	Service Verification Service Verified from 01-12-2011 to 30-11-2012
<i>Official</i> D.E.O Kurram	30/11/2014	Inc	<i>Official</i> D.E.O Kurram				<i>Official</i> Add: A.E.O Sadda Kurram	

1	2	3	4	5	6	7	8
Name of Post	Whether Substantive of officiating any. whether permanent or temporary	If officiating state. (1) substantive appointment of (ii) whether service counts for pension under rule 3-20 C.S.R. (Pb) Volume II اگر عارض ہے تو رول کے مطابق پیشکش کا مستحق ہے؟	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of government servant
			Rs. Ps.	Rs. Ps.	ماسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
P.T.C Post	(3530-190-9230)	BPS-7		3530		29/5/2010	Sh...
SSPS Social Karam ch.							
do	do			3530		1-12-2010	Sh...
do	do	BPS (5800-320-15400)		5800		1-7-2011	Sh...
do	do	BPS 9 (6200-380-17600)		6200		7-7-2011	Sh...
do	do			6200		1-12-2011	Sh...
do	do			6580		1-12-2012	Sh...
do	do			6960		1-12-2013	Sh...
P.T.C Post	upgradation to BPS-12						
GCPS Uchat	to all PST teacher wif						
Lowos Cum	1-7-2012	Pay fixed 7000 or 5200					
	BPS 12 (7500-500-22000)			7500		12-2-2012	Sh...
do	do						
do	do			8000		1-12-2013	Sh...

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9 Signature and designation of the Head of the Office or other attesting officer in attestation of column 1 to 8 دستخط افسر مجاز	10 Date of termination or appointment تاریخ انقطاع ملازمت	11 Reason of termination (such as promotion, transfer, dismissal etc.) وجوہات انتقال ملازمت ترقی تبادلہ یا برطرفی	12 Signature of the head of the office or other Attesting Officer دستخط افسر مجاز	13 Nature and duration of leave taken رخصت کی نوعیت و معیار	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government. چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین Period Government to which debitable	14 Signature of the Head of the office other attesting officer دستخط افسر مجاز	15 Reference to any recorded punishment of censure, or reward, or praised o the Government servants سزا یا جزایا غیر مناسب کارکردگی کا ریکارڈ
							Service Verification Service Verified from 01-12-2012 30-11-2014 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2014 30-11-2017 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2017 30-11-2018 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2017 30-11-2018 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2018 30-11-2019 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2019 30-11-2020 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2019 30-11-2020 from office records
							Case I D.E.O Kurrum Service Verification Service Verified from 01-12-2019 30-11-2020 from office records

ANSWER
BY
P

16

Kurram at Ara C

S#: 1

P Sec:001 Month:August 2012
KM1118 -ADDITIONAL AGENCY EDU OFFR
Min. Of K.A & N.A & S.F.R

Pers #: 00674643 Buckle:
Name: Shamim Bibi

NTN:
GPF #:
Old #: 30251878090

PRIMARY SCHOOL TEACHER
CNIC No.2130251878090
CPF Interest Applied
09 Regular / Contract

KM1118 -CK1

PAYS AND ALLOWANCES:

0001-Basic Pay	6,580.00
1000-House Rent Allowance	1,146.00
1210-Convey Allowance 2005	1,500.00
1300-Medical Allowance	1,000.00
1505-Charge Allowance	40.00
1528-Unattractive Area Allow	1,528.00
1865-Teaching Allowance (2006)	500.00
1948-Adhoc Allowance 2010@ 50%	1,910.00
1970-Adhoc Relief Allow 2011	573.00
Gross Pay and Allowances	16,093.00

DEDUCTIONS:

3661-E.E.F.(Exchange)	75.00
3701-Benevolent Fund(Exchange)	180.00
3704-Group Insurance(Exchange)	67.00
3711-Addl Group Insuranc(Exch)	7.00

Subrc:

Total Deductions.

329.00

15,764.00

D.O.B LFP Quota:
03.03.1986 Payment through DDO.

02 Years 03 Months 005 Days

Kurram at Ara C

S#: 2

P Sec:001 Month:August 2012
KM1118 -ADDITIONAL AGENCY EDU OFFR
Min. Of K.A & N.A & S.F.R

Pers #: 00674643 Buckle:
Name: Shamim Bibi

NTN:
GPF #:
Old #: 30251878090

PRIMARY SCHOOL TEACHER
CNIC No.2130251878090
CPF Interest Applied
09 Regular / Contract

KM1118 -CK1

PAYS AND ALLOWANCES:

2118-Adhoc Relief Allow (2012) 1,316.00

AM/Atul
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P

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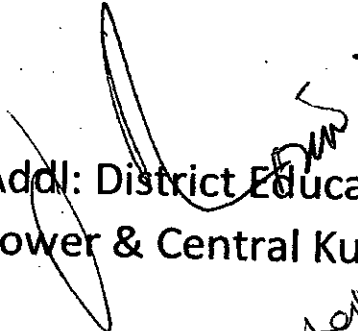
SERVICE CERTIFICATE.


Certified that Miss Shamim Bibi

D/S/O SPIN GULL has been serving in
Education Department since 2010.

Presently he/she working as PST

at GGPS Uchat Lower Kurram


Addl: District Education Officer
Lower & Central Kurram Sadda

Attest
By 

171

Kurram at Ara C

S#: 1

P Sec:001 Month:August 2012
KMI118 -ADDITIONAL AGENCY EDU OFFR
Min. Of K.A & N.A & S.F.R

Pers #: 00674643 Buckle:
Name: Shamim Bibi
PRIMARY SCHOOL TEACHER
CNIC No.2130251878090
CPF Interest Applied
09 Regular / Contract

NTN:
GPF #:
Old #: 30251878090

KMI118 -CK1

PAYS AND ALLOWANCES:

0001-Basic Pay	6,580.00
1000-House Rent Allowance	1,146.00
1210-Convey Allowance 2005	1,500.00
1300-Medical Allowance	1,000.00
1505-Charge Allowance	40.00
1528-Unattractive Area Allow	1,528.00
1865-Teaching Allowance (2006)	500.00
1948-Adhoc Allowance 2010@ 50%	1,910.00
1970-Adhoc Relief Allow 2011	573.00
Gross Pay and Allowances	16,093.00

DEDUCTIONS:

3661-E.E.F. (Exchange)	75.00
3701-Benevolent Fund (Exchange)	180.00
3704-Group Insurance (Exchange)	67.00
3711-Addl Group Insuranc.(Exch)	7.00

Total Deductions

329.00

15,764.00

D.O.B

LFP Quota:

03.03.1986

Payment through DDO.

02 Years 03 Months 005 Days

Kurram at Ara C

S#: 2

P Sec:001 Month:August 2012
KMI118 -ADDITIONAL AGENCY EDU OFFR
Min. Of K.A & N.A & S.F.R

Pers #: 00674643 Buckle:
Name: Shamim Bibi
PRIMARY SCHOOL TEACHER
CNIC No.2130251878090
CPF Interest Applied
09 Regular / Contract

NTN:
GPF #:
Old #: 30251878090

KMI118 -CK1

PAYS AND ALLOWANCES:

2118-Adhoc Relief Allow (2012) 1,316.00

AKW
BY
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(E)

ADD: AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY.
PHONE: 0926 370674 FAX: 0926520674
No. _____ /Edu
Dated Sadda the _____ /2013

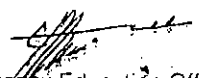
APPOINTMENT.

Consequent upon the approval by the Selection Committee, the appointment of the following DM Female teachers are hereby ordered in the school noted against their names against vacant posts purely on Regular contract basis in BPS No 9 Plus usual allowances as admissible under the rules with immediate effect.

S #	Name of Candidate	Father Name	School where Appointed	Remarks
1	Samreena Sadaf	Haji Ameen Khan	GGMS Tarali	Against Vacat Post
2	Shamim Bibi	Spin Gul	GGMS Dogar	Against Vacat Post
3	Parveen Bibi	Spin Gul	GGMS Ossaj	Against Vacat Post
4	Bibi Jamila	Niaz Bahadar Khan	GGMS Tabikhonikhel	Against Vacat Post

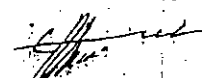
TERMS/CONDITIONS.

1. They are directed to produce their Medical certificate from the Medical Supdt: AIHQ Hospital Sadda Kurram Agency.
2. Their age should be between 18-40 years.
3. Their appointment is purely made on temporary and Regular contract basis and liable to termination at any time without assigning any notice, in case they want to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
4. No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the Issuing Authorities concerned.
5. If they failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
6. Charge reports should be submitted to this office.
7. Their appointment will be consider as regular but without Pension/gratuity on the term of section-15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act. 2003 but will be entitled to contribution Provident Fund at such rate as may be prescribed by the govt.


Add: Agency Education Officer
Lower & Central Kurram Sadda

No 125-33 / Edu Dated 15/11 /2013
Copy forwarded to the.

1. Director of Education FATA KPK, Peshawar.
2. Agency Account officer Parachinar.
3. Political Agent Kurram Parachinar.
4. Asstt: Political Agent Central Kurram.
5. Teachers Concerned.
6. Headmistress concerned.
6. Office file.


Add: Agency Education Officer
Lower & Central Kurram Sadda

AMK
13/11
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BETTER COPY

Dated 11/12/2015

Termination order

Consequent upon the direction by the competent authority, directorate of education FATA Peshawar vide his No. _____ DATED 07/12/2015 on the _____ over sign committee the following in eligible teaching/non teaching appointee (M/F) BPS-7-9 appointed during _____ 2013 in lower and central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S.No.	Name	Father Name	Desgn	BPS	Name of Institution	Remarks
1.	Aqib Zaman	Saeed Amir Shah	CT	09	GHS Bagan	Due to excess in Sub Division Quota
2.	Muhammad Asif	Syal Khan	CT	09	GHS Makhi Zai	Due to excess in Sub Division Quota advance appoint against on fill post
3.	Sara Bibi	Sakhi Marjan	DM	09	GGMS Bagan	DM Diploma found fack and bogus
4.	Shahid Mehmood	Haji Sher Shah	PET	09	GMS Sra Ghurga	Diploma JDPE found fake and bogus
5.	Muhammad	Haji Shah Wazir	PET	09	GMS Arawall	Having no professional qualifacation
6.	Muhammad Alam Khan	Salam Khan	J/C	07	GMS Makhi Zai	Failed in typing test and rejected by inquiry officer
7.	Zubair Khan	Ghafoor Khan	J/C	07	GDC Bagan	Rejected by PA enquiry
8.	Muhammad	Gul Marjan	J/C		GGDC Ali Zai	Failed in typing test as per advertisment and rejected by enquiry officer
9.	Sakh akbar	Sadiq Akbar	J/C	07	GHS Kochi	Failed in typing test as per advertisment and rejected by enquiry officer
10.	Saida Batool	Abid Alam Jan	Lab/A sstt	07	GGDC Ali Zai	Documents not provided for verification
11.	Muhammad Saeed	Zarbat Khan	CT	09	GHS Baza	Terminated due to excess in Sub Divisional Quota
12.	Muhammad Sadiq	Abdul Rasheed	CT	09	GHS Ossai	Terminated due to excess
13.	Latif Hussain	Inam Hussain	CT	09	GHS Angori	Domicile Holder of uper Kurram
14.	Wahid Zaman	Zota Khan	CT	09	GHS Dogar	Terminated due to excess Sub Divisional Quota
15.	Farooq Muhammad	Ara Gul	CT	09	GMS Taudy Oby	Out of merit M.Ed his wrongly been consider in place of M.A
16.	Ajmal Akbar	Akbar Khan	CT	09	GGMS Dogar No. 2	Terminated due to excess in Sub Divisional Quota
17.	Miss Sakina	Said Akbar	CT	09	GGMS Tahi Khonkad	Terminated due to excess in Sub Divisional Quota
18.	Sambreen	Zaman Khan	CT	09	GGMS Pairah	Document not provided
19.	Shamim Bibi	Spin Gul	DM	09	GGMS Dagar No. 2	Having no DM Certificate and has not provide B.A Degree for the verification
20.	Parveen Bibi	Spin Gul	DM	09	GGMS Ossai	Having no DM Certificate and has not provide B.A Degree for

						the verification
21.			DM	09	GGMS Khoni Kel	Having no DM Certificate/Diploma
22.	Said Rehman		DM	09	GMS Dappa	IDPE Diploma found Bogus
23.	Gul Aslam	Khan Bahadar	PET	09	GMS	IDPE Diploma found Bogus
24.	Kifayat Ullah		PET	09	GMS KIMAL SAZA	Having no professional documents
25.	Zartaj Bibi	Haji Ajmir Khan	PET	09	GGMS Ossai	Having no professional documents and lower Kurram Domicile Holder while she was appointed in Central Kurram
26.	Sajid Rehman	Said Aslam Khan	I/C	07	GHS Paloseen	Has been excluded by PA Inquiry
27.	Siraj Ud Din	Wilayat Khan	I/C	07	GHS Mantoo	Failed in typing test as per advertisement and rejected by inquiry Officer

Additional Agency Education

Lower & Central Kurram Sadda

No. 2987-93/Edu Dated 11/12/2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Central Kurram.
6. Principal/Headmaster concerned for similar action.

Additional Agency Officer

Lower & Central Kurram Sadda

(19)

"F"

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TERMINATION ORDER

Dated 11/ 12 /2015

Consequent upon the direction by the competent authority, Director of Education (FA) Peshawar vide his No 12228 dated 07.12.2015 on the oversight committee the following in-eligible teaching/Non teaching appointed (M/FE) APS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S #	Name	Father Name	Desg:	B P S	Name of Institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota
2	Muhammad Asif	Syal Khan	CT	9	GHS Makhizai	Terminated due to excess in sub divisional quota advanced against on fill post
3	Sara Bibi	Sakhi Mar Jan	DM	9	GGMS Bagan	DM diploma found fake & bogus
4	Shahid Mehmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of IDPE found fake & bogus
5	Muhammad Usmani	Haji Shah Wazir	PET	9	GMS Arawali	Having no professional qualification
6	Muhammad Alam Khan	Salam Khan	I/C	7	GHS Makhizai	Failed in typing test & rejected by enquiry officers
7	Zubair Khan	Ghafoor Khan	I/C	7	GGDC Bagan	Rejected by PA enquiry
8	Muhammad Sadiq	Gul Mar Jan	I/C	7	GGDC Alizai	Failed in typing test as per advertisement & rejected by enquiry officers
9	Sakhi Akbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officers
10	Sadia Batool	Abid Alam Jan	Lab/A-ssit	7	GGDC Alizai	Documents not provided for verification
11	Muhammad Saeed	Zor Bat Khan	CT	9	GHS Baza	Terminated due to excess in sub divisional quota
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GHS Ossai	Terminated due to excess in sub divisional quota
13	Latif Hussain	Inam Hussain	CT	9	GHS Angori	Domicile holder of upper kurram
14	Wahid Zaman	Zawta Khan	CT	9	GHS Dogar	Terminated due to excess in sub divisional quota
15	Farooq Muhammad	Arab Gul	CT	9	GMS Taudy Obi	Out of merit (M.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogar No-2	Terminated due to excess in sub divisional quota

ATTESTED

Handwritten signature and initials at the bottom of the page.

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1	Sakina	Haji Amir Khan	DM	9	GGMS Tabi Khanikhel	Terminated due to ex in sub divisional quot
2	Samreen	Haji Amir Khan	DM	9	GGMS Farahi	Documents not provi for verification
3	Sajida Bibi	Haji Amir Khan	DM	9	GGMS Dogar NO-2	Having no DM certifi & has not provide BA degree for verification
4	Samreen Bibi	Haji Amir Khan	DM	9	GGMS Ossai	Having no DM certifi & has not provide BA degree for verification
1	Rooh Jamila	Nizam Bahadar	DM	9	GGMS Tabi Khanikhel	Having no DM certificate/diploma
22	Sajid Rehman	Haji Hader Khan	PET	9	GMS Dappa	JDPE diploma found & bogus.
23	Zia ul Alam	Noor Alam	PET	9	GMS Khazeena	JDPE diploma found & bogus.
24	Gul Hassan	Khan Bahadar	PET	9	GMS Ilamai	JDPE diploma found & bogus.
25	Kafayatullah	Haji Jehan	PET	9	GMS Kimal Saza	Having no profession documents.
26	Zar Taj Bibi	Haji Amir Khan	PET	9	GGMS Ossai	Having no profession documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared in CT (LK) while appointed as PET (CK)
27	Sajid Rehman	Said Aslam Khan	I/C	7	GHS Paloseen	Has been excluded by PA enquiry.
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add: Agency Education Officer
Lower & Central Kurram Sadda.

No 2987-93 /Edu: Dated 11 / 12 /2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Add: Agency Education Officer
Lower & Central Kurram Sadda.

ATTESTED

Amir
BY
[Signature]

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"G"

ADD: AGENCY EDUCATION



FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARAK ROAD PESHAWAR, PAKISTAN

NO. 6077
DATED 26/5

AD16 176 GENERAL APPL

To:

The Additional Agency Education Officer
Lower/Central Kurram

Subject:

ADJUSTMENT OF IN-SERVICE PTC TEACHERS:

Memo:

I am directed to refer to your letter No.3923-24 dated 09/5/2016 on the subject noted above and to ask you that the in-service teachers who were promoted to next higher post in Lower/Central Kurram and then removed from services by oversight committee on different grounds may be adjusted on their own posts occupied before promotion to higher post, subject to checking their service record on available vacant post out of those posts given to NTS observing rules and policy in vogue.

[Signature]
Assistant Director (Estab)

Endst.No.: 6078-81
Copy to:

Dated 26/5 2016

1. Agency Education Officer Kurram Agency with the remarks to adjust the teacher at S.No.7 against vacant PST post reveals from Upper Kurram after checking his service record (list enclosed).
2. Agency Accounts Officer Kurram Agency at Parachinar.
3. PS to Secretary SSD FATA
4. P.A to Director Education, FATA.

[Signature]
Assistant Director (Estab)

Ahsan
BY
PO



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H

ADD: AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY
PHONE: 0936-570674 FAX: 0936-570674
No. _____/Edu:
Dated Sadda: the ____/____/2016

ADJUSTMENT ORDER

Consequent upon approval of the Over Sight Committee and Directorate of Education FATA Endst No 6077 dated 26-05-2016. The following PST Teachers promoted to CT/DM Posts and their promotion has been withdrawn is hereby adjusted as PTC in the following Schools noted against their names with effect from the date of their posting against higher posts.

S/#	Name/Desig:	School where adjusted	Remarks
1	Farooq Muhammad PTC GPS Audh CK promotion as CT to GMS Taudy Oba CK whose order has been cancelled.	GPS Khazina CK	Against Vacant Post
2	Ajmal Akbar PTC GGPS Uchat LK promotion as CT to GGMS Dogar CK whose order has been cancelled.	GGPS Ismail Khan Kalai LK	Do
3	Bibi Jamila PTC GGPS Khormana CK promotion as DM to GGMS Khani Khel CK whose order has been cancelled.	GGPS Badama CK	Do
4	Bibi Sakina PTC GGPS Shamkanri CK promotion as CT to GGMS Khani Khel CK whose order has been cancelled.	GGPS Shamkhai CK	Do

Note: - Charge report should be submitted in duplicate to the undersigned.

Add: Agency Education Officer
Lower & Central Kurram Sadda

Endst No 4467 - 73 /Edu Dated 06/06/2016.

- 1:- Director of Education FATA Warsak Road Peshawar.
- 2:- Agency Account Officer Kurram Parachinar.
- 3:- Political Agent Kurram Parachinar.
- 4:- Teachers concerned.

Add: Agency Education Officer
Lower & Central Kurram Sadda

AMR
By

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بصورت - ڈائریکٹر انچارج ایف ایف ایف

رہنما / ڈائریکٹر ایف ایف ایف

صاحب عالی! ڈائریکٹر ایف ایف ایف کے پاس آئیے، اسٹیشن ہاؤس اور ایف ایف ایف

رہنما ڈائریکٹر ایف ایف ایف سے 2012ء میں DM کے زیر دہریہ کی
تعمیراتی ڈائریکٹر ایف ایف ایف کے پاس ایف ایف ایف کی بنیادی دستاویزوں کی
تعمیراتی ڈائریکٹر ایف ایف ایف سے 2016ء میں DM کے پاس ایف ایف ایف کی

ایک بعد اسٹیشن کے ڈائریکٹر ایف ایف ایف کے پاس ایف ایف ایف کی
DEFATA کے ڈائریکٹر ایف ایف ایف کے پاس ایف ایف ایف کے پاس
ڈائریکٹر ایف ایف ایف کے پاس ایف ایف ایف کے پاس ایف ایف ایف کے پاس
تمام ڈائریکٹر ایف ایف ایف کے پاس

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FATA SECRETARIAT
 DIRECTORATE OF EDUCATION
 WARSAR ROAD PESHAWAR, PAKISTAN
 PHONE: 091-9210166 FAX 091-9210216
 No. 14853 /Date Pesh: the 14/11 /2016
 E-6, New AD(W)-Kurram

To

The Additional Agency Education Officer
Lower/Central Kurram

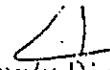
Subject: APPEAL FOR ADJUSTMENT IN SERVICE PST TEACHERS


I am directed to enclose herewith a self-explanatory appeal in respect of Mst. Shamim Bibi Ex- PST and Mst. Parveen Bibi Ex-PST Lower Central Kurram on the subject cited above, for your comments/detail report alongwith documentary proofs in the light of this Directorate letter No. 6077.dated 26.07.2016.

Encls. No. 14853 / Dated 14/11 2016.
Copy to:

PA to Director Education, FATA.


Deputy Director (Estab)


Deputy Director (Estab)

Attched
By


REMINDER-1


To

The Additional Agency Education Officer
Lower & Central Kurram Agency at Sadda

Subject: APPEAL FOR RE-INSTATMENT

Memo:

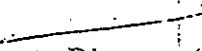
In continuation of this Directorate letter No.14852 dated 14/11/2016 on the above noted subject and to stat that the requisite information/comments is still awaited at your end which may be expedited without any further loss of time please.

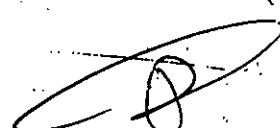

Deputy-Director (Estab)

Endst.No. _____ / Dated _____ 2016.

Copy to:-

PA to Director Education, FATA.


Deputy Director (Estab)

Ame
B7


BETTER COPY

(K)

Addl: Agency Education Office

Sadda Lower Kurram Lower

No. 141

Dated 18/5/2017

To:

The Direction Education

FATA Warsak Road Peshawar.

Subject:- ADJUSTMENT OF IN SERVICE PST TEACHERS

MEMO:

Please refer to your letter No. 9580 dated 15-5-2017 regarding subject cited

Above.

It is obvious from the reports of the Then Additional Agency Education Officer LK/CK vide his No. 3923-24/Edu Dated 09/05/2016, in which 5 PSTs have already been adjusted on their own posts after their removal from DMs posts, so as per policy the remaining candidates i.e Parveen Bibi and Shamim Bibi are also eligible for adjustment against PST posts., However, their adjustment made as per under please.

S.No	Name	Adjusted at	Remarks
1.	Shamim Bibi PST	GGPS Said Karim	Against vacant post
2.	Perveen Bibi PST	GGPS Said Ali Mela CKDo.....

Addl: Agency Education Office

LK/CK at Sadda Lower Kurram Lower

(26)

K

Addl: Agency Education Office

Sadda Lower Kurram Agency

No. 1141 /Edu

Dated 18/5 /2017

To:

The Director Education
FATA Warsak Road Peshawar

Subject:-

ADJUSTMENT OF INSERVICE PST TEACHERS

Memo:-

Please refer to your letter No. 9580 dated 15-5-2017 regarding subject cited above.

It is obvious from the response of the Then Additional Agency Education Officer LK/CK vide his No.3923-24/Edu dated 09-5-2016, in which 05 PSTs out of 07 PSTs have already been adjusted on their own posts after their removal from DM posts, so as per policy the remaining candidates i.e Perveen Bibi and Shamim Bibi are also eligible for adjustment against PST posts. However their adjustment made as under please:-

S.No	Name	Adjusted at	Remarks
1.	Shamim Bibi PST	GGPS Said Karam CK	Against vacant post
2.	Perveen Bibi PST	GGPS Said Ali Mela CK

19/5/2017

E-6

3075
19/5/2017

Addl: Agency Education Officer
LK/CK at Sadda Kurram Agency

AWM
BY
D

جناب ڈائریکٹر آف ایجوکیشن فائناپشاور

عنوان: اپیل اور خواست برائے Adjustment کرنے PTC پوسٹ

جناب عالی:

گزارش قابل غور ہے کہ سائیلان نے پہلے بھی Adjustment کے لیے اپیل کیا تھا۔ جس کے نتیجے میں Additional اے ای اولور سینٹرل گرم ایڈجسٹمنٹ خواہی لکھا تھا مگر تا حال التواء کا شکار ہے۔

لہذا آپ صاحبان کی خدمت میں التجا کی جاتی ہے۔ کہ ایڈیشنل اے ای او برائے ایڈجسٹمنٹ ہدایت جاری کرے۔ اور مزید تاخیر نہ کرے۔

عین نوازش ہوگی

مورخہ: 02/06/2017

Additional Education LK+CK

file issue appointment order of the appointees.

۱۔ پروین بی بی PTC

۲۔ شمیم بی بی PTC

دانشگاه کربلا / مرکز تحقیقات فنی

موضوع: ... / ...

PTC

دانشگاه کربلا / مرکز تحقیقات فنی

موضوع: ... / ...

دانشگاه کربلا / مرکز تحقیقات فنی

دانشگاه کربلا

Ad: No 10522 / 5/117
No 10522 / 5/117
Ad: No 10522 / 5/117
No 10522 / 5/117

Sh. PTC
Pervin PTC

FATHI ...
02/06/17

Amer
P

بیرہ صاحب ڈسٹرکٹ ایجوکیشن آفیسر کرم پانڈیٹ

درخواست برائے ایڈمنٹیشن در سائے

- 1 سماجی سروس ایسوسی ایشن
- 2 سماجی سروس ایسوسی ایشن

صوبائی اور مورخانہ ڈسٹرکٹ ایجوکیشن آفیسر کے پاس درخواستیں دے سکتے ہیں

جن کے منتور درخواست گزار کو منتخب ہے۔ (ملاؤ ٹر) کوئی 866 سٹی/اسامیان

اسامیان کے منتور، جس کے ذریعے درخواست گزار کے پاس اسامیان موجود ہے

کہ ساری ریکارڈیں اور درخواست گزار کو منتخب ہے۔ لیکچر درخواست ہے

ملاؤ ٹر مگر بیماری اور ایڈمنٹیشن کا ارڈر ملانے کے لیے

تاریخ 14/10/2020

سماجی سروس ایسوسی ایشن SH

سماجی سروس ایسوسی ایشن P

AMT

(Signature)



OFFICE OF THE DISTRICT EDUCATION OFFICER
KURRAM TRIBAL DISTRICT

No. 1760 /Edu Dated 20-11/2020
Email:- deokurram110@gmail.com

ADJUSTMENT

Consequent upon the approval of the Over Sight Committee and Directorate of Education Merged Areas Peshawar endst No.6077 dated 26-5-2016 and decision of the committee, the following PST teachers were promoted to DM posts and their promotion had been withdrawn are hereby adjusted as PST on their own pay and scales in the following schools noted against their names with effect from the date of their posting against DM posts:-

S.No	Name and Designation	School Where Adjusted	Remarks
1	Ms. Perveen Bibi PST	GGPS Bhutoo Kali LK	Against vacant post
2	Shamim Bibi PST	GGPS Hchat LK	Against vacant post

Note:- Charge report should be submitted to this office.

District Education Officer
Tribal District Kurram

Endst No. 1761-65 /Edu Dated 20 /11/2020

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer District Kurram.
3. Additional District Education Officer LK/CK.
4. Teachers concerned.
5. Office file.

District Education Officer
Tribal District Kurram

BY
[Signature]

(31)

The District Education Officer
District Kurram

Subject:- INQUIRY REPORT

With reference to your memo No.3378 dated 04-4-2021 regarding inquiry into the allegation made by Mr. Khadim Muhammad against the adjustment of Two Female PSTs.

INTRODUCTION

A complaint filed by Khadim Muhammad of village Uchat Lower Kurram against the appointment/adjustment of Ms. Perveen Bibi PST and Ms. Shamim Bibi PST D/O Speen Gul of Village Bagan and handed over to the undersigned for facts, finding and recommendation.

FINDINGS

It has been observed from available record of Two PSTs i.e Ms: Perveen Bibi and Ms. Shamim Bibi D/O Speen Gul of village Bagan Lower Kurram were appointed by the Then Additional AEO Lower/Central Kurram (Mr. Rahim Dad) during May 2010. Later on both were promoted/adjusted as Drawing Masters in 2013 by the Then Additional AEO LK/CK (Mr. Maen Gul).

In 2013 the Directorate NMD Peshawar was constituted oversight committee to inquire into the promotion of these teachers, as a result they were dropped from the DM posts due to illegal promotion. They were approached through appeal to the Director Education FATA Peshawar for adjustment against their own PST posts in 2016 and Directorate of Education FATA vide his No. 6077 dated 26-5-2016 addressed the Additional Agency Education Officer Lower/Central Kurram to adjust them on their posts, but they have not been adjusted on their own posts due to unknown reasons inspite of laps of 07 years. Here it is mentioning that their appointment are not clear whether they were initially appointed through legal process or other wise.

RECOMMENDATION

After thoroughly analysis and checking the record, We the inquiry committee reached to the conclusion that:-

1. The initial appointment is seems to be doubtful which requires to be cleared from the appointing authority whether the appointment was made as per policy.
2. At present scenario it needs that the adjustment order may be withdrawn.
3. Both may be placed at liberty to approach the Legal Forum to attain their rights as per Law.

To adopt the legal way for the purpose, it is recommended that the adjustment may be withdrawn and the appellants is on liberty to knock the door of Legal Forum for availing their rights.

1. Wajid Ali Principal B-19

2. Inayat Ali Principal B-18

19-04-2021

19/04/2021

Handwritten signature and initials in the bottom center of the page.

(32)

11/19/21



OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT KURRAM
No. 3511 /Edu Dated: 19/4/2021
Email: deokurram110@gmail.com

NOTIFICATION FOR CANCELLATION

Consequent upon the recommendations of the enquiry committee formed to probe into the Adjustment border No, 1746 dated 20/11-2020, issued by this office regarding reinstatement of two teachers, the order stand cancelled/ withdrawn from the date of issue.

[Signature]

District Education Officer
District Kurram

Copy for info to:

Copy for information to:-

- 1) Deputy Commissioner District Kurram
- 2) Director Elementary & Secondary Education KP Peshawar.
- 3) Office Copy.

[Signature]

District Education Officer
District Kurram

Accepted
BY
[Signature]



'R" (33)

**TO THE DIRECTOR ELEMENTARY & SECONDARY
EDUCATION MERGE AREA KHYBER PAKHTUNKHWA
PESHAWAR.**


Through: Proper Channel

**DEPARTMENTAL APPEAL AGAINST THE
ORDER DATED 19/04/2021 WHEREBY THE
APPOINTMENT/ADJUSTMENT ORDER
DATED 20/11/2020 OF THE APPELLANT HAS
BEEN CANCELLED/ WITH DRAWN WITH
OUT ANY REASON.**

Respectfully Sheweth:

The appellant submits as under:

- 1- That appellant has been appointed as PST on 28/05/2010 and after appointment the Appellant performed her duty with full devotion and hard work.
- 2- That the appellant has been promoted to DM Post on 15/01/2013 and later on, on dated 11/12/2015 the service of the Appellant as a DM has been terminated without any reason.
- 3- That after the said termination the Appellant has been submitted an application to Respondent Department for her appointment on her previous post as PST which has been forwarded for further proceedings but in vain while other colleagues of the Appellant has been appointed/adjusted as PST on 2016 Departmentally and the Appellant has not

Attest
BY 

34

been adjusted which is a clear cut discrimination on part of Respondent Department.

- 4- That after that the Appellant submitted a Departmental appeal on 02/06/2017 to Respondent Department for her adjustment and on response of which the Appellant has been appointed as PST on 18/05/2017 but the Appellant has not been allowed for due to on the ground of the said appointment/adjustment order dated 18/05/2017.
- 5- That due to the reason mention in para-4 the Appellant submitted an application to Respondent Department for her adjustment in response of which the Appellant has been stated that the said post has been filled with Court orders wait for vacant post and forwarded the said application for further proceedings.
- 6- That on 20/11/2020 the Appellant has been appointed as PST by the Respondent Department and after appointment performed her duty regularly and with hard work.
- 7- That on 19/04/2021 the service of the Appellant has been cancelled/withdrawn by the Respondent Department without any reason.

Grounds:



20

A) That the cancellation/withdrawn order dated 19 04 2021 of the Appellant has been void and illegal because it has been passed without fulfilling the codal formality.

B) That the cancellation order of service is also illegal because there is no illegality on part of the Appellant.

C) That no show cause notice no charge sheet has been issued before passing the impugned order.

D) That no opportunity of defense and personal hearing has been provided to the Appellant.

It is, therefore most humbly prayed that on acceptance of this Departmental appeal the appellant may kindly be reinstated on his service alongwith all back benefit of service. Any other remedy which seems fit appropriate may also be granted in favour of the appellant.

Dated 28/04/2021

Appellant

Mst. Shamin Binti

PST

(Signature)

(35)

- A) That the cancellation/withdrawn order dated 19/04/2021 of the Appellant has been void and illegal because it has been passed without fulfilling the codal formality.
- B) That the cancellation order of service is also illegal because there is no illegality on part of the Appellant.
- C) That no show cause notice no charge sheet has been issued before passing the impugned order.
- D) That no opportunity of defense and personal hearing has been provided to the Appellant.

It is, therefore most humbly prayed that on acceptance of this Departmental appeal the appellant may kindly be reinstated on his service alongwith all back benefit of service. Any other remedy which deems fit appropriate may also be granted in favour of the appellant.

Dated 28/04/2021

Appellant



Mst. Shamim Bibi
PST



(30)

S 33

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
(MERGED AREAS) KHYBER PAKHTUNKHWA

NOTIFICATION

1. **WHEREAS**, Mst. Shameem Bibi was appointed as PTC at District Kurram in 2010.
2. **ANDWHEREAS** she was appointed to the post of DM (Drawing Masters) in 2013.
3. **ANDWHEREAS** after the appointment on the posts of DM some allegations / complaints were lodged against the recruitment process and the Political Agent upon the directions of Erstwhile FATA secretariat constituted a committee on Agency base wherein the process was scrutinized and recommendations were submitted to the FATA Secretariat and the FATA Secretariat has constituted an over sight committee to check the report / status of the recruitment process. The FATA Secretariat on the basis of deficiencies recommended her to be terminated w.e.f their appointments date.
4. **ANDWHEREAS** after terminations due to the oversight committee decision along with other appointees, she has submitted an application for adjustment on her previous posts i.e PTC and the same was approved by the appellate authority(Director Education FATA), the Additional Agency Education Officer Lower & Central Kurram was directed for her adjustment on previous post.
5. **ANDWHEREAS** other applicants were adjusted but she was not adjusted at the time.
6. **ANDWHEREAS** in September 2020 another application was submitted to the DEO Kurram, wherein she was adjusted against the post of PST, but after adjustment, someone has made an application against her that her appointment order 2010 is bogus / fake.
7. **ANDWHEREAS**, the DEO Kurram has constituted an enquiry committee in light of the complaint, the committee has placed the following recommendations.
 - i. The initial appointment is seems to be doubtful which requires to be cleared from the appointing authority whether the appointment was made as per policy.
 - ii. At present scenario it needs that the adjustment order may be withdrawn.
 - iii. Both may be placed at liberty to approach the legal forum to attain their rights as per law.
8. **ANDWHEREAS**, the DEO Kurram has cancelled / withdrawn her adjustment order in light of the inquiry recommendations.

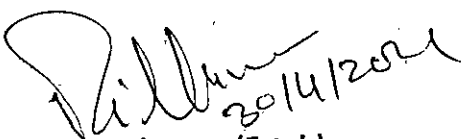
Now therefore, provision under Section-21 of General Clauses Act 1897 as amended in 1956, read with APT Rules 1989 & in exercise of the powers conferred upon the undersigned in a capacity of an Appellate Authority, the Departmental Appeal of the appellant is hereby stand rejected and kept intact the cancellation / withdrawal order of DEO Kurram.

DIRECTOR,
(E&SE) Department Khyber
Pakhtunkhwa, Peshawar.

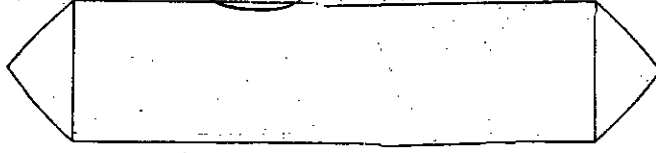
Endst: No: 6149-52 / Dated Peshawar the 30/4 / 2021

Copy forwarded for information & n/action to the: -

1. Additional Director (Estab), Merged Areas.
2. District Education Officer Kurram at Parachinar.
3. Mst. Shameem Bibi, Ex-PST, District Kurram
4. PA to Director local office.


Deputy Director (Estab)
Merged Areas

بعدالت مناجح



اللہ تعالیٰ
الحق کے لئے

2022ء منجانب
سید محمد اسحاق بنام

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکد

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے دائرہ عدالت کے لئے درخواست کی ہے۔
آن مقام کے لئے درخواست کی ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب وہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے 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۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخنتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

سید محمد اسحاق

المرقوم ۱۶ ماہ ۲۰۲۲ء

العہدہ
مقام
کے لئے منظور ہے۔
Accepted BY
PO



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

No. 2548 /ST

Dated: 21/12 /2021

All communications should be
addressed to the Registrar KPK Service
Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To

The District Education Officer,
Government of Khyber Pakhtunkhwa,
Kurram.

Subject: JUDGMENT IN APPEAL NO. 4993/2021 MST. SHAMIM BIBI & 1 OTHER.

I am directed to forward herewith a certified copy of Judgement dated
10.11.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 4993/2021.

Shameem BibiAppellant.

Versus

District Education Officer Kurram & others.....Respondents

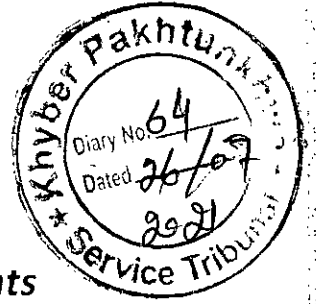
Comments on behalf of Respondent No. 2.

Preliminary objections.

- That the appellant has got no cause of action, locus standi to file the instant appeal.
- That the appellant has not come to this Court with clean hands.
- That the appeal is not maintainable in the present form.
- That the appellant is estopped by his own conduct to bring the instant appeal.
- That the appeal is badly time barred.
- That the appellant has concealed material facts from the Honorable Service Tribunal.

ON FACTS.

1. That Para-1 is Correct to the extent that the appellant has been served the Education Department Kurram as PST Teacher.
2. That Para-2 is correct to the extent that the appellant was appointed as DM 2013 but later on an enquiry was conducted and report was submitted to the oversight committee of the Erstwhile FATA Secretariat, wherein the appellant was terminated due to the reason that she was lacking of professional qualification Diploma in drawing, the plea for re-instatement on the post DM is time barred and closed matter.
3. That para-3 is correct to the extent that the appellant submitted an application for re-instatement on her own previous post i.e PST in light of Directorate of Education Erstwhile FATA letter but she was not re-instated due to the reason that there was no vacant post at time and also correct that other colleagues of the appellant have been adjusted in 2016.
4. That detail reply has already been submitted under para-3 on facts above, hence needs no further comments.
5. That detail reply has already been submitted under para-3 on facts above, hence needs no further comments.
6. That para-6 is correct, the appellant was re-instated on her previous post i.e PST on 20-11-2020.
7. That a complaint against the appointment of the appellant was received, wherein an enquiry was conducted and the enquiry committee placed recommendations for



Shameem Bibi

the cancellation / withdrawing of the re-instatement order, the appellant re-instatement order was cancelled / withdrawn in light of the enquiry recommendations . **(Enquiry Report attached as Annex-A).**

8. That the appellate Authority rejected the appeal legally, as the cancellation withdrawn order by the District Education Officer Kurram was in light of the recommendation of the enquiry report.
9. That respondent department is also submit on the following grounds inter alia.


GROUND.

- A. Incorrect and denied the responded department has acted according to the Law / Policy.
- B. Incorrect and denied, the respondent department has acted according to the inquiry recommendations.
- C. Incorrect and dined, the respondent department has acted as per inquiry recommendations, furthermore as per enquiry report the initial appointment of the appellant seems doubtful which requires to be cleared from the appointing authority whether the appointment was made as per policy.
- D. Incorrect and denied, the inquiry committee after thoroughly analysis and checking the record, recommended the appellant re-instatement for cancellation / withdrawal.
- E. Incorrect and denied, the inquiry committee after thoroughly analysis and checking the record, recommended the appellant re-instatement for cancellation / withdrawal.
- F. That the cancellation / withdrawal of re-instatement order was made in light of inquiry report, the inquiry committee after thoroughly analysis and checking the record, recommended the appellant re-instatement for cancellation / withdrawal.
- G. That the cancellation / withdrawal of re-instatement ,order was made in light of inquiry report, the inquiry committee after thoroughly analysis and checking the record, recommended the appellant re-instatement for cancellation / withdrawal.
- H. The respondent department has acted as per inquiry recommendations, furthermore as per enquiry report the initial appointment of the appellant seems doubtful which requires to be cleared from the appointing authority whether the appointment was made as per policy.
- I. Incorrect. Already explain in above paras.

Prayer:

In the light of the above stated facts, it is humbly prayed that the instant appeal may be ordered as dismiss.

Respondent No.2

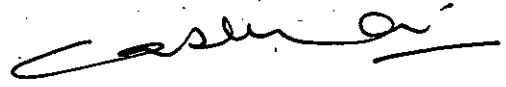


District Education Officer Kurram

AFFIDAVIT

I the above respondent do hereby declare and affirm that the above comments are true and correct to the best of my knowledge and thereof nothing has been concealed from this Honorable Tribunal.

Respondent No.2



District Education Officer Kurram

The District Education Officer
District Kurram

Subject: INQUIRY REPORT

With reference to your memo No.3378 dated 04-4-2021 regarding inquiry into the allegation made by Mr. Khadim Muhammad against the adjustment of Two Female PSTs.

INTRODUCTION

A complaint filed by Khadim Muhammad of village Uchat Lower Kurram against the appointment/adjustment of Ms. Perveen Bibi PST and Ms. Shamim Bibi PST D/O Speen Gul of Village Bagan and handed over to the undersigned for facts, finding and recommendation.

FINDINGS

It has been observed from available record of Two PSTs i.e Ms: Perveen Bibi and Ms. Shamim Bibi D/O Speen Gul of village Bagan Lower Kurram were appointed by the Then Additional AEO Lower/Central Kurram (Mr. Rahim Dad) during May 2010. Later on both were promoted/adjusted as Drawing Masters in 2013 by the Then Additional AEO LK/CK (Mr. Maeen Gul).

In 2013 the Directorate NMD Peshawar was constituted oversight committee to inquire into the promotion of these teachers, as a result they were dropped from the DM posts due to illegal promotion. They were approached through appeal to the Director Education FATA Peshawar for adjustment against their own PST posts in 2016 and Directorate of Education FATA vide his No. 6077 dated 26-5-2016 addressed the Additional Agency Education Officer Lower/Central Kurram to adjust them on their posts, but they have not been adjusted on their own posts due to unknown reasons inspite of laps of 07 years. Here it is mentioning that their appointment are not clear whether they were initially appointed through legal process or other wise. }

RECOMMENDATION

After thoroughly analysis and checking the record, We the inquiry committee reached to the conclusion that:-

1. The initial appointment is seems to be doubtful which requires to be cleared from the appointing authority whether the appointment was made as per policy.
2. At present scenario it needs that the adjustment order may be withdrawn.
3. Both may be placed at liberty to approach the Legal Forum to attain their rights as per Law.

To adopt the legal way for the purpose, it is recommended that the adjustment may be withdrawn and the appellants is on liberty to knock the door of Legal Forum for availing their rights.

1. Wajid Ali Principal B-19

2. Inayat Ali Principal B-18

Wajid Ali
19/04/2021

19-04-2021