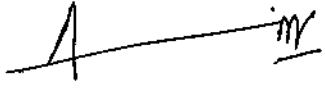


FORM OF ORDER SHEET

Court of _____

Case No. - _____ **144/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/1/2023	<p>The appeal of Mst. Saina resubmitted today by Mr. Amjad Ali Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Saina d/o Muhammad Siyar r/o village and post office Yar Hussain Tehsil Razzar Swabi received today i.e. on 02.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Page no.32 & 33 are illegible which may be replaced by legible/better one.

No. 57 /S.T.

Dt. 5/1 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amjad Ali Adv. Madan.

Respected sir

~~All Objections removed
and resubmit appeal
completed~~

16/1/2023

Amjad Ali
Advocate
Supreme 

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1114 /2023

Saina D/O Muhammad Siyar R/O Village and Post Office Yar Hussain Tehsil Razzar and District Swabi

..... (Appellant)

VERSUS

Govt of KPK through Secretary Elementary and Secondary Education at Block A, 3rd Floor, Building A, Civil Secretariat Peshawar and others

..... (Respondents)

INDEX

S.No	Description of Documents	Annexure	Page
1	Service appeal along with affidavit		1-5
2	Copy of the academic documents	A	6-15
3	Copy of the appointment order dated 29/7/2019	B	14-15
4	Copy of the minutes of the Departmental Selection Committee meeting dated 28/07/2019	C	16-19
5	Copy of the medical certificate	D	20
6	Copy of the pay release order dated 25/09/2019	E	21
7	Copy of the induction training program	F	22-27A
8	Copy of the monthly salary statement for the month of February 2022	G	28-28A
9	Copy of the notification dated 31/12/2020	H	29
10	Copy of the notification dated 26/03/2021	I	30-31
11	Copy of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act 2022	J	32-33
12	Copy of the duty certificate dated 01/03/2021	K	34
13	Copy of the application dated 19/04/2022	L	35

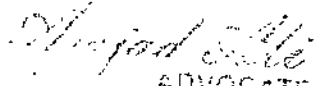
14	Copy of the notification dated 05/08/2022	M	36-
15	Copy of the departmental appeal dated 05/09/2022 along with post office receipt	N	37-40
16	Wakalatnama		611

Appellant 

Through


Amjad Ali (Mardan)
Advocate
Supreme Court

Dated: 2/1 /2023


ADVOCATE
SUPREME COURT

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 11/4 /2023

Saina D/O Muhammad Siyar R/O Village and Post Office Yar
Hussain Tehsil Razzar and District Swabi

..... (Appellant)

VERSUS

- 2631
2/01/2023
1. Govt of KPK through Secretary Elementary and Secondary Education at Block A, 3rd Floor, Building A, Civil Secretariat Peshawar.
 2. Director General, Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar at Hashtnagri Chowk near Qila Bala Hisar Peshawar.
 3. Director of Education KP, at Hashtnagri Chowk near Qila Bala Hisar Peshawar.
 4. District Education Officer (female) Swabi at District Education Office female Swabi.

..... (Respondents)

SUBJECT: *Appeal under section 4 of Service Tribunal Act against the notification bearing Endst No 1914-1919/File Dated 05/08/2022 passed By District Education Officer Female Swabi received on 15/08/2022 wherein The DEO(F) Swabi has opined to disown the appointment order of the appellant which is illegal against law and facts and liable to be set aside.*

Respected Sir,

Appellant humbly submits as under:

1. That appellant is qualified upto PTC, BEd, MA (Education) of the academic documents are attached as Annexure A)
2. That appellant was appointed as Theology Teacher (TT) in BPS-15 w.e.f 01/09/2019 vide appointment order dated 29/07/2019 which is duly signed by the DEO(F) Swabi (Copy of the appointment order dated 29/07/2019 is attached as Annexure B)
3. That appellant was appointed as TT after due

recommendation of the Departmental Selection Committee wherein the minutes of the meeting dated 28/07/2019 clearly states that all codal formalities have been completed for appointment and the appellant is recommended for appointment on merit **(Copy of the minutes of the Departmental Selection Committee meeting dated 28/07/2019 is attached as Annexure C)**

- 4. That appellant's medical is conducted by the Medical Superintendent DHQ Teaching Hospital Swabi wherein appellant is declared medically fit **(Copy of the medical certificate is attached as Annexure D)**
- 5. That after observing all codal formalities and due verification, the District Education Officer (Female) Swabi issued the pay release order dated 25/09/2019 of the appellant **(Copy of the pay release order dated 25/09/2019 is attached as Annexure E)**
- 6. That appellant attended Induction Training Program on the orders of the respondent no 4 **(Copy of the induction training program is attached as Annexure F)**
- 7. That appellant performed her duty to the entire satisfaction of her superiors and was holding the post of Theology Teacher (TT) in GGHS Zaida Swabi and received salaries **(Copy of the monthly salary statement for the month of February 2022 is attached as Annexure G)**
- 8. That District Education Officer (F) Swabi extended the contract period of the appellant from 01/09/2020 to 31/08/2021 vide notification dated 31/12/2020 **(Copy of the notification dated 31/12/2020 is attached as Annexure H)**
- 9. That respondent no 4 vide notification dated 26/03/2021 further extended the contract period of appellant **(Copy of the notification dated 26/03/2021 is attached as Annexure I)**
- 10. That the appellant at the time of appointment was given the assurance by the Department that the contractual service of the appellant would be regularized as the services of other similarly placed employees and previous employees have been regularized by the Department and to this effect an Act by the name of Khyber Pakhtunkhwa Teachers (Appointment and

Regularization of Services) Act 2022 been passed by the Provincial Assembly of KP to regularize the services of all teachers and therefore the services of the appellant are to be considered as regular (**Copy of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act 2022 is attached as Annexure J**)

- 11. That the Head Mistress GGHS Zaida has issued a duty certificate dated 01/03/2021 in respect of the appellant wherein she affirmed that the appellant is on duty at GGHS Zaida as TT (**Copy of the duty certificate dated 01/03/2021 is attached as Annexure K**)
- 12. That the salary of the appellant was stopped, for release of salary the appellant submitted an application dated 19/04/2022 (**Copy of the application dated 19/04/2022 is attached as Annexure L**)
- 13. That neither any inquiry is conducted nor the appellant is associated with any such inquiry.
- 14. That vide notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022, the DEO(F) Swabi has opined to disown the appointment order of the appellant which is illegal against law and facts (**Copy of the notification dated 05/08/2022 is attached as Annexure M**)
- 15. That appellant filed departmental appeal dated 05/09/2022 against the notification dated 05/08/2022 received on 15/08/2022 which is duly dispatched through registered post which departmental appeal remained un-responded (**Copy of the departmental appeal dated 05/09/2022 along with post office receipt is attached as Annexure N**)
- 16. That the impugned notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022 is illegal against law and facts on the following grounds:

GROUND:

- A. Because appellant is innocent and falsely charged.
- B. Because appellant was not associated with the enquiry

(4)

proceedings nor any witness was examined in presence of the appellant nor appellant was confronted with any documents/record.


- C. Because appellant has neither been charge sheeted nor statement of allegation has been issued to the appellant nor show cause notice has been given to the appellant nor regular inquiry has been conducted.
- D. Because the concerned officers were neither interrogated nor arrayed as an accused in the instant case which is a glaring illegality and appellant being a low-paid employee has been made a scapegoat.
- E. Because all codal formalities have been completed and appellant is eligible for the post of Theology Teacher (TT).
- F. Because the whole inquiry and the whole proceedings are illegal as appellant cannot be targeted alone while excluding all the concerned government servants, their DEOs(F), the DA II/EMIS etc which is against the judgments of the Honorable Supreme Court of Pakistan and the appellant alone cannot be made a scapegoat.
- G. Because a vested right in favour of the appellant has been created wherein appellant have performed duty for almost 03 years and appellant cannot be divested of the same.
- H. Because the principle of Audi Alteram Partem is to be read into every statute.
- I. Because as per the principle of Audi Alteram Partem (No one can be condemned unheard), which principle has been defeated in the instant case as the appellant has neither been charge sheeted, nor statement of allegation has been issued nor show cause notice has been issued nor any opportunity of hearing has been afforded nor the appellant has associated with any inquiry nor any witness has been examined in presence of the appellant nor any opportunity of cross examination has been provided.
- J. Because the appointment order has been passed after observing all codal formalities and in accordance with law and once the appointment order has been acted upon and the appellant has performed duty for almost 03 years,

then the Department cannot back-track as per principle of locus poenitentiae as a vested right has been created in favour of the appellant.

- K. Because there is no provision of disowning an appointment order in service laws/ Govt Servant E&D Rules 2011.
- L. Because the DEO(F) Swabi has transgressed her authority by issuing the impugned notification.
- M. Because there is no reason much less plausible for disowning the appointment order.
- N. Because the DEO(F) Swabi who signed the appointment order has not even been questioned to this effect.
- O. Because appellant has no approach to the official record of Education Department.
- P. Because the DEO(F) Swabi who signed the appointment order has never been inquired about the appointment order and she has never disowned the said appointment order and in such eventuality, the disowning of appointment order by the current DEO(F) Swabi has no legal significance and illogical.
- Q. Because appellant is jobless and entitled for back benefits.

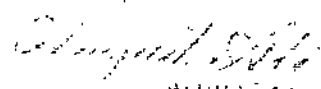
It is therefore humbly prayed that on acceptance of this service appeal, impugned notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022 wherein the DEO(F) Swabi has opined to disown the appointment order of the appellant may please be set aside and appellant may please be reinstated in service with all back benefits.

Appellant



Through

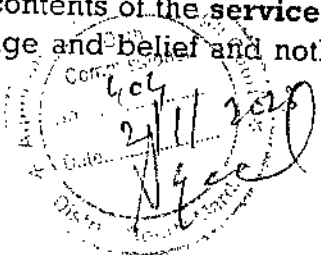
Amjad Ali (Mardan)
Advocate
Supreme Court



ADVOCATE
SUPREME COURT

Dated: 2/1 /2022

AFFIDAVIT

I, Saina D/O Muhammad Siyar R/O Village and Post Office Yar Hussain Tehsil Razzar and District Swabi (appellant), do hereby solemnly affirm and verify that the contents of the service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



Deponent 

Ann-A

(6)

Roll No. 2396

Serial No. 499865

Board of Intermediate and Secondary Education
Peshawar
Hyber Pakhtunkhwa Pakistan



REVISED

Secondary School Certificate Examination

SESSION 2001-ANNUAL

(HUMANITIES GROUP)

Certified that Saina Son/Daughter Of Muhammad Siyar
Student of Govt. Girls High School, Yar Mussain, Swabi

has qualified for award of Secondary School Certificate in the Examination held in March/April, 2001
as a Regular student and obtained 503 marks out of 850 and has been placed in Grade C

Representing Good The Candidate passed in the following subjects.

- | | |
|---------------------|---------------------|
| 1. English | 2. Urdu |
| 3. Islamiyat (comp) | 4. Pakistan Studies |
| 5. Mathematics | 6. General Science |
| 7. Islamic Studies | 8. Pashto |

His/Her date of birth according to Admission Form is February 01, 1985

In Words (First February One Thousand Nine Hundred Eighty Five)

Issued in lieu of OC # 331616 (Annual-2001)



Asstt. Secretary

Secretary

Printed Date & Time March 16, 2022 4:13:29 PM
This certificate is issued without alteration or erasure.

[Handwritten Signature]
Advocate
District Courts Mardan

7

S. No. 203711

Roll No. 222

Group. MEDICALS



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MARDAN
INTERMEDIATE EXAMINATION
SESSION 2004 - Supplementary

This is to certify that SAINA

and resident of District Swabi

Registration No. 116-BIGSHK-01

Daughter of MUHAMMAD SYAR

Examination of the Board of Intermediate & Secondary Education Mardan held in NOV/Dec 2004

as a PURVIS Candidate she obtained 511 Marks out of 1100 and has been placed in

Grade D Representing Fair

Asst. Secretary



Secretary

Approved For: Advocate
District Courts Mardan

This certificate is issued only in the form of return

(2)

DEPARTMENT OF PUBLIC INQUIRY
(P.I.)

Section Annual Group 1908
and a private candidate of Shah / Magister of Mardan District of Swat Province of Swat

having passed the prescribed examination held in June 1908
is this day admitted by the University of Peshawar to the degree of

BACHELOR OF ARTS

in Arabic Division

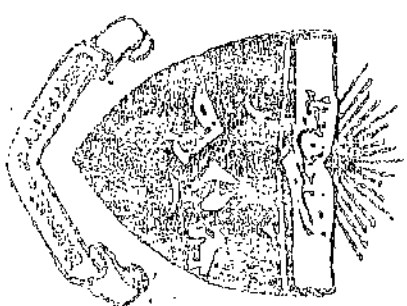
The Examination was held at Peshawar in 1908

Serial No 0128549

REGISTRATION No. 3005-PO-5447

Roll No. P.I.

Examinations held on 27th November, 2008



Muhammad Pasha Khan
President
Muhammad Pasha Khan
Magister
Muhammad Pasha Khan
Registrar

Muhammad Pasha Khan
Advocate
District Courts Mardan

No. 002802

UNIVERSITY OF PESHAWAR

(9)



Pakistan
Detailed Marks Certificate
Master of Arts in Islamiyat

Final

Annual Examination 2011

District Swabi



Private

Name: SAINA ASIF

Gender: Female

Roll No: 37724

Father's Name: MUHAMMAD SEYAR

Registration No: 2005-PC-6447

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	56	Fifty Six
Principles of Islamic Jurisprudence-VII	100	61	Sixty One
Islam & Other World Religions-VIII	100	51	Fifty One
Islam & Contemporary Muslim World-IX	100	52	Fifty Two
Islam, Modren Thought & Islamic Law of Inheritance-X	100	47	Ferty Seven
Viva Voce	100	50	Fifty Only
Previous	500	277	Two Hundred and Seventy Seven
Final	1100	594	Five Hundred and Ninety Four

Errors & omissions are subject to subsequent rectification

Chances Availed: 3

Examination held From 14-Jul-2011 to 04-Aug-2011

Result Declared on Monday, January 30, 2012

Issue Date: 29-Feb-2012

9:21 am

(Iftekhar Hussain Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

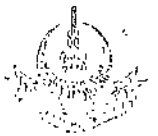
Computerized by RTC

Swabi Area

Muhammad Ali Khan
Advocate
District Courts Mardan

Serial No.
147524

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Name SAIBA
Father's Name MUHAMMAD SYAR
Address VILL. DOBIAN W/O ASLF.
Tehsil LAHORE
District SWABI

Roll No. T645257
Registration No. 06NST0309
Final Semester AUF- 2006

10

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	62
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	56
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	59
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	65
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	85
AUT- 06	0617	TEACHING OF URDU	100	56
AUT- 06	0618	TEACHING OF MATHEMATICS	100	67
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	63
AUT- 06	0620	TEACHING OF ISLAMIC & SOCIAL STUDIES	100	33

CREDITS : 5

Total Marks / Obtained 900 / 572

Result Declared on SEPTEMBER 20, 2007

Percentage / Grade 64 B

Date of issue SEPTEMBER 25, 2007



[Signature]

Controller of Examinations

Disclaimer :

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

[Signature]

District Courts Mardan

Serial No. -067049

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
TRANSCRIPT

11



Serial No 159436

Roll No. AY670858

Name SAJNA

Registration No 06NCT0309

Father's Name MUHAMMAD SIYAR

Enrollment Semester SPR-2014

Address

Final Semester AUT-2016

C/O ASIF INVESTIGATION OFFICE SHAH MANSOOR TOWN

Tehsil SWABI

District SWABI



has successfully completed MASTER OF EDUCATION (M.ED)
TEACHER EDUCATION

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 14	0831	FOUNDATIONS OF EDUCATION	100	68
SPR- 14	0837	EDUCATIONAL RESEARCH	100	70
SPR- 14	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	67
SPR- 14	0840	EDUCATIONAL PSYCHOLOGY	100	61
AUT- 14	0826	ELEMENTARY EDUCATION	100	62
AUT- 14	0827	SECONDARY EDUCATION	100	70
AUT- 14	0828	HIGHER EDUCATION	100	57
SPR- 15	6505	ISLAMIC SYSTEM OF EDUCATION	100	54
SPR- 15	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	68
SPR- 15	6552	TEXTBOOK DEVELOPMENT-I	100	54
SPR- 15	6553	TEXTBOOK DEVELOPMENT-II	100	64
AUT- 16	0829	TEACHER EDUCATION IN PAKISTAN	100	59

Credit Hours 36

Result Declared on OCTOBER 10, 2017

Date of Issue OCTOBER 19, 2017

Total Marks/Obtained 1200 / 754

Percentage/Grade 63 / B



Controller of Examinations

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

Advocate

District Courts Marican

DOMICILE CERTIFICATE

(12)

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

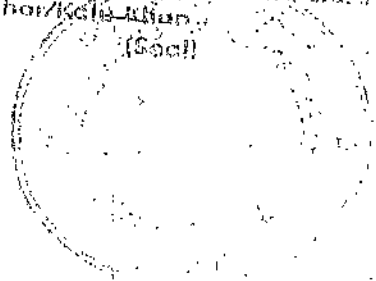
I was born at Village/Mohallah YARMOUS SALES / MUHAMMAD KHAN Tehsil LAHOR District Swabi.

Saiena
Signature of the declarant
Date 9-7-2001

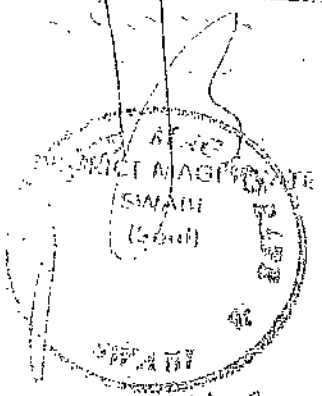
Pursuance to the declaration dated: 9-7-2001 filed by SAIENA Son/Daughter of MUHAMMAD SYARIF domiciled in North West Frontier Province, it is hereby certified, that the said SAIENA is born of parents who are permanent residents of the North-West Frontier Province having been born/settled within it. I have satisfied my self from personal knowledge/verification that the above declaration is true and certify accordingly.

This 10th Day of July 2001

Name: [Signature]
Designation: MAGISTRATE 1st Class
Tehsil/Lahor/Kala Khan (Swabi)



COUNTERSIGNED



11097

[Signature]
Advocate
District Courts Mardan

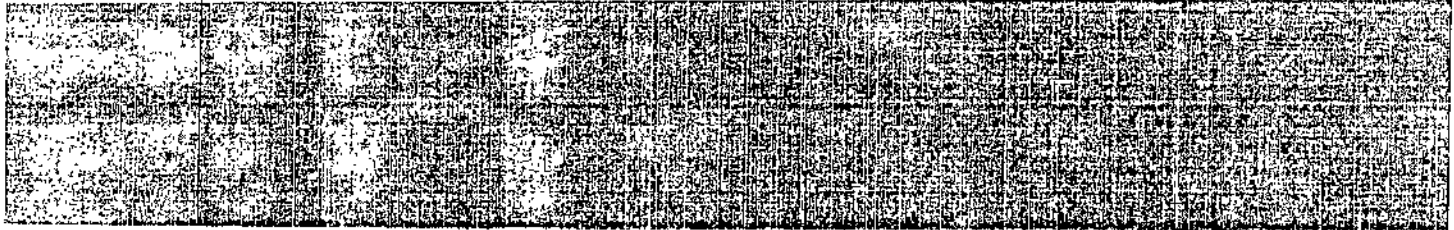
(13)

Handwritten text in Urdu script, possibly a title or header, including the number 13.

Handwritten notes or dates, including the number 92 and the year 2007.

Main body of handwritten text in Urdu script, consisting of several lines of cursive writing.

Official stamp and signature area. The stamp includes the text 'REGISTERED AND ADDED' and 'Tahsil Dar Azhar'. A signature is written over the stamp, and the number 101 is written below it.





**DISTRICT EDUCATION OFFICE
(FEMALE) SWABI**

Phone No: 0938-280339

Email: emisfswabi@yahoo.com

[/deofswabi](http://deofswabi)

A
B
(14)



APPOINTMENT OF TT(LEFT OVER)

Consequent upon the recommendation of the Departmental Selection Committee as contained in its minutes Issued vide this office No: 3989 Dated 29-07-2019, appointment of the following candidate is hereby ordered against the posts of **TT in BPS-15 (Rs.16120-1330-56020) @ Rs. 16120/-** fixed plus usual allowances as admissible under the rules on adhoc basis on Contract in under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from 01-09-2019.

TT-Female BPS-15						
Sr	Name	Father Name	Date Of Birth	Total Score	CNIC & Address	School
1	SAINA	MUHAMMAD SIYAR	01/02/1985	98.02	16201-4858520-2 VPO Yar Hussain, Tehsil Razzar, District Swabi	GGHS ZAIDA

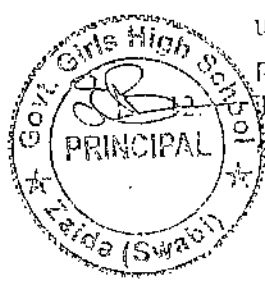
Terms & Conditions.

1. TA/DA is not allowed to any one.
2. Charge reports should be submitted to all concerned.
3. This appointment is purely on temporary & contract basis, initially for one year wcf. 01/09/2019 to 31/08/2020.
4. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DDO (concerned). If any one found producing bogus certificate will be reported to the law enforcing agencies for further action.
5. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
6. Pay will not be drawn until and unless a certificate to the effect by DDOs (concerned) is issued that her/their certificates are verified.
7. They should join their posts within 15 days after 01-09-2019. In case of failure to join their posts within 15 days from 01-09-2019 appointments will expire automatically and no subsequent appeal etc; shall be entertained.
8. Health and age certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. They must take nine (09) months mandatory Professional training from RJE/PITE Colleges of Khyber Pakhtunkhwa.
10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
11. 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 rules framed from time to time.

Their appointments are made on school based. They will have to serve at the places of posting and their services are not transferable to any other station.

[Handwritten Signature]

[Handwritten Signature]
District Courts Mardan



12. Their appointments are made on school based. They will have to serve at the places of posting and their services are not transferable to any other station.
13. Before handing over charge once again their documents may be checked if they have not the required relevant qualifications they may not be handed over charge.
14. If anyone wrong position holder candidate (having low score) was appointed erroneously, her appointment shall be cancelled any time in the best interest of the entitled/right position holder candidate.

(15)

(DILSHAD BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI
Dated Swabi the 29-07-2019

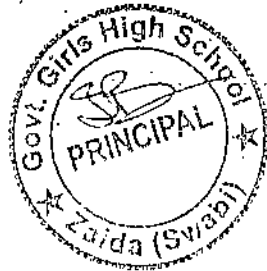
Endst No:3993 - G/DA-II

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

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Swabi.
3. District Monitoring Officer (IMU) Swabi.
4. District Accounts Officer, Swabi.
5. B&AO Local Office.
6. Sub.Div Educational Officer Female Concerned.
7. Principals/Head Masters concerned schools.
8. Officials concerned.



DISTRICT EDUCATION OFFICER
(FEMALE) SWABI
Distt: Education Officer
(Female) Swabi



Manager
District Courts Mardan



DISTRICT EDUCATION OFFICER
FEMALE SWABI
PH No. 0938-280339

Ann-C

MINUTES OF THE MEETING OF DEPARTMENTAL SELECTION
COMMITTEE HELD ON 29-07-2019 AT 10:00 AM IN OFFICE OF THE
District Education Officer Female Swabi

(16)

Meeting Agenda: Appointment of CT, AT, PET, DM, and PST Disabled
Candidates female

1. A meeting of the Departmental Selection Committee was held on 29-07-2019 at 10:00 AM under the chairmanship of District Education Officer Female Swabi to discuss the Appointment case of CT, AT, PET, DM, and PST Disabled Candidate Female on Adhoc School based, in the Elementary & Secondary Education Department. The following attended the meeting:

1. **DILSHAD BEGUM** In Chair
DISTRICT EDUCATION OFFICER
FEMALE SWABI

2. **SUAKH MULK**
DY. DISTRICT EDUCATION
OFFICER FEMALE SWABI
REPRESENTATIVE OF THE
DIRECTOR
ELEMENTARY & SECONDARY
EDUCATION KHYBER
PAKHTUNKHWA

3. **ABIDA FARVEEN**
DEPUTY DISTRICT EDUCATION
OFFICER FEMALE SWABI

4. **FARHA DEEBA**
ADEO SECONDARY
DISTRICT EDUCATION OFFICE
SWABI

2. The meeting started with recitation from the Holy Quran. The Chair welcomed the participants and apprises that Posts of SST were advertised on 05-07-2019, last date for submission of applications was 22-07-2019. Tests have been conducted through NTN, on 02nd, 03rd, 09th and 10th March 2019. Merit lists and Provisional selection lists were prepared as per the following selection criteria.

Interview was conducted by District Education Officer Female, all the Documents and Disability Certificates were scrutinized by Committee, and Final Merit List were Disphoned on 28-05-2019. Selection Criteria:

District Education Officer
Female Swabi
District Courts Mardan

I. Appointment through initial recruitment on adhoc shall be made through Merit on School based.

II. For selection of suitable candidate by initial recruitment, Total 200 marks shall be distributed in the following manner: -

(a) Screening Test conducted by Independent third party(NTS)= 100 Marks

(b) Academic Qualification = 100 Marks

These 100 marks will be further distributed as under:-

Category of Qualification	(Total marks 100)
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/ BSc	Marks obtained X 20 / total marks =
MA/MSc	Marks obtained X 20 / total marks =
BED/MA Education	Marks obtained X 5 / total marks =
MED/MA MedEducation	Marks obtained X 5 / total marks =
Mphil/PHD	Marks obtained X 10 / total marks =

In case 4 year BS programme/BSs Hon if equivalent to Master Degree shall be calculated as marks obtained X 40 / Total Marks

In case of MA Education marks will be calculated as under:

Marks Obtained X 10 / total Marks (05 Numbers for B.Ed and 05 Numbers for M.ed).

The following items were considered by the Departmental Selection Committee and the decisions recorded below:

ITEM NO.1 APPOINTMENT OF CT FEMALE BPS-15(DISABLE)

Total No of Posts Advertised= 04

Tests was conducted through NTS. Merit lists were prepared and displayed on the Website of NTS and their appointment orders according to the Final Selection lists were issued of the candidates in the schools noted against their names, which were advertised.

As per final merit list the following candidates may be appointed being on merit.

Sr	Name	Father Name	Date Of Birth	MIC	Total Score	CNIC & Address	School
1	NEELAM IQBAL	MUHAMMAD IQBAL	15/02/1987	16202-1873708-0	123.87	16202-1873708-0 HOUSE NO 405 ST NO 19 SECTOR F-5 PHASE 6 HAYATABAD PESH	GGHS Manki
2	SABAHA KHAN	HABIB KHAN	05/05/1985	16201-9197640-4	108.42	16201-9197640-4 VILLAGE ANDPOST OFFICE YAQUBI TEH RAZZAR DISTT SWABI	GGMS Jaganath
3	ERAM NAZIR	MUHAMMAD NAZIR	04/05/1989	16202-8619737-0	98.56	16202-8619737-0 VILL AND PO KARNAL SHER KILLI MOH JALALABAD DIST SWABI	GGMS Narangi
4	NIGHAT SHOUKAT	SHOUKAT ALI	12/04/1982	16202-2950883-2	90.86	16202-2950883-2 MOH ALLAHQAD KHIL VILL AND PO DAGI TEH RAZZAR DIST SWABI	GGMS Jaganath

Muhammad Nadeem
Muhammad Nadeem
District Courts Mardan

ITEM NO.2 APPOINTMENT OF AT FEMALE BPS-15 (DISABLE)**Total No of Posts Advertised= 01**

Tests was conducted through NTS, Merit lists were prepared and displayed on the Website of NTS and their appointment orders according to the Final Selection lists were issued of the candidates in the schools noted against their names, which were advertised.

As per final merit list the following candidates may be appointed being on merit.

Sr	Name	Father Name	Date Of Birth	Total Marks	CNIC & Address	School
1	NAILA	HAKEEM KHAN	21/07/1981	86.88	16202-6683770-2 ISLAMIA ENGLISH MEDIUM SCHOOL MANERI TEH SWABI SDI9STT SWABI	GGHS Jhanda

ITEM NO.3 APPOINTMENT OF DM FEMALE BPS-15 (DISABLE)**Total No of Posts Advertised= 01**

Tests was conducted through NTS, Merit lists were prepared and displayed on the Website of NTS and their appointment orders according to the Final Selection lists were issued of the candidates in the schools noted against their names, which were advertised.

As per final merit list the following candidates may be appointed being on merit.

Sr	Name	Father Name	Date Of Birth	Total Marks	Address	School
1	SAMREEN BEGUM	KHANIM ULLAH	10/02/1991	72.89	16202-2810723-4 MOH SIRAJ PUR KARNAL SHER KILLI TEH RAZAR DIST SWABI	GGMS Juma Khan Ghari

ITEM NO.4 APPOINTMENT OF PET FEMALE BPS-15 (DISABLE)**Total No of Posts Advertised= 01**

Tests was conducted through NTS, Merit lists were prepared and displayed on the Website of NTS and their appointment orders according to the Final Selection lists were issued of the candidates in the schools noted against their names, which were advertised.

As per final merit list the following candidates may be appointed being on merit

Sr	Name	Father Name	Date Of Birth	Total Score	Address	School
1	MALIKA	SAEED ULLAH	03/04/1985	69.39	16202-8710725-2 VILL AND PO KALU KHAN MOHALLAH BAZED KHIL DIST SWABI TEH KAZZAR	GGMS Naranji

ITEM NO.5 APPOINTMENT OF TT FEMALE BPS-15 (DISABLE)**Total No of Posts Advertised= 01**

Tests was conducted through NTS, Merit lists were prepared and displayed on the Website of NTS and their appointment orders according to the Final Selection lists were issued of the candidates in the schools noted against their names, which were advertised.

As per final merit list the following candidates may be appointed being on merit.

S.No	Name	Father Name	Date Of Birth	Score	Address	School
1	SAINA	MUHAMMAD SIYAR	01/02/1985	98.02	16201-4858620-2	GGHS ZAIDA

ITEM NO.6 APPOINTMENT OF PST FEMALE BPS-12 (DISABLE)**Total No of Posts Advertised= 03**

Tests was conducted through NTS, Merit lists were prepared and displayed on the Website of NTS and their appointment orders according to the Final Selection lists were issued of the candidates in the schools noted against their names, which were advertised.

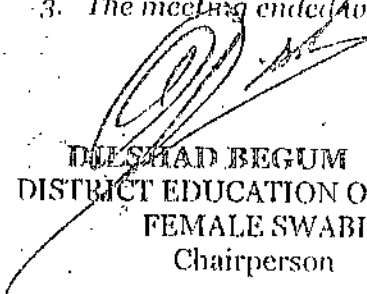
As per final merit list the following candidates may be appointed being on merit

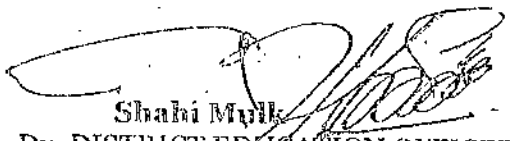
S.No	Name	Father Name	Date Of Birth	Score	Address	School
1	SAIMAARA	ABDUL MALIK	01/04/1990	85.96	16201-1315588-6 MOHALLAH AYCOUB KHIL VILLAGE TEHSIL PO LAHOR SWABI	GGPS Dhab Koroon Lahor


Muhammad Farhan
Muhammad Farhan
Advocate
District Courts Mardan


HAIRA	WARIS KHAN	01/03/1986	85.36	16202-5505556-6 MOHALLAH BABU KHEIL VILLAGE & P/O ZAIDA DISTT SWABI	GGPS No.3 Zaida
HAIRA RAUF	RAUF KHAN	22/03/1998	83.22	16202-3793547-0 MOH ALI KHEL VILLAGE KALABAT DISTRICT SWABI TEHSIL TOBI	GGPS No.2 Kalabat

3. The meeting ended with a vote of thanks to and from the chair.


DILESHAD BEGUM
DISTRICT EDUCATION OFFICER
FEMALE SWABI
Chairperson


Shahi Mulk
Dy: DISTRICT EDUCATION OFFICER
MALE SWABI
Representative of the Director E&SE
Peshawar

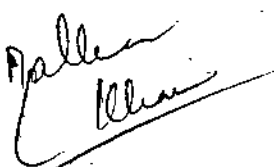

ABIDA PARVEEN
DEPUTY DISTRICT EDUCATION OFFICER
FEMALE SWABI


FARHA DEEBA
ADEO SECONDARY
DISTRICT EDUCATION OFFICE SWABI

Endost No: 3989/DA-II/Estab/2019

Dated: 28/7/2019


DISTRICT EDUCATION OFFICER
FEMALE SWABI


Mohammad Talib Khan
Advocate
District Courts Mardan



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ TEACHING HOSPITAL SWABI

Telephone & Fax #: 0938-221267
dhqteachinghospitalswabi@gmail.com

MEDICAL CERTIFICATE

Annex-D

Official's Name : Miss Sains

Father's Name : Muhammad giyar

Religion : Muslim

Residence : Village & P/O Yar Hussain Tehsil
Razzar District Swabi,

Date of Birth : 01/02/1985

Exact height : 5'2"

Mark of Identification : mark of: wide face.

Official Signature : S.A.

Signature of Deptt: Incharge: _____

Seal of Deptt: Incharge: _____

(20)

I do hereby certify that I have examined Miss Sains a candidate for employment in the office of the Education Department Swabi and cannot discover that he had any disease communicable or other constitutional infection or bodily infirmity except

nip

I do not consider this as disqualification for employment in the office of the above (TT- Female) H/s/Her age according to his/her own statement is 34 years and by appearance about THIRTY FOUR (34) years.

[Signature]
Medical Superintendent
DHQ Teaching Hospital
Swabi
Medical Superintendent
DHQ Teaching Hospital
Swabi

8
31
2019

Left/Right hand thumb and fingers impression:



[Signature]
District Courts Mardan




(21) *Ann - E*

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

Phone No: 0938-290339

Email: emistswabi@yahoo.com

 /deefswabi

PAY RELEASE ORDER

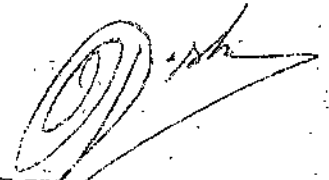
Consequent upon the verification of all academic / professional documents Pay in respect of the following teaching staff is hereby release w.e.f their date of taking over charge.


S#	Name	Designation	School
1	SABAHAT KHAN	CT	GGMS JAGANATH
2	ERAM NAZEER	CT	GGMS NARANJI
3	NIGHAT SHAUKAT	CT	GGMS JAGANATH
4	NAILA	AT	GGHS JHANDA
5	SANREEN BEGUM	DI	GGMS BATA
6	MILIKA	PE	GGMS NARANJI
7	SAINA	TT	GGHS ZAIDA

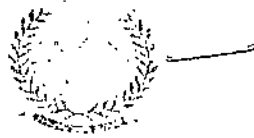
(DILSHAD BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endors: No. 4754 DA-EMISABLE PAY RELEASE Dated 25/9/2019
Copy of the above is forwarded for information and necessary action to the:-

5. District Accounts Officer Swabi.
6. ADO (B&A) Local Office.
7. Principal of concerned schools.
8. Official Concerned.


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI


Muhammad Talha Khan
Advocate
District Courts Mardan



Ann-F (22)

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

(Office phone & Fax No 0938280339, emisfswabi@yahoo.com)
No: 179-6 / EMIS/AP/ Prp/Induction 2019-20

Dated: 25/1/2020

To,

Principal, Head Mistresses
Concerned School as per the teachers list below

Subject: INDUCTION TRAINING OF AT, T, QARIA, PET & DM
Memo,

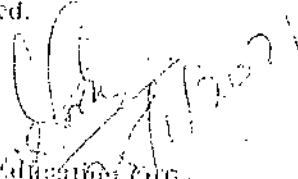
Reference to Principal RITE Female Swabi office Memo No: 2089 Dated 23-01-2021 on the subject cited above, The Nine Months mandatory Induction training of the teachers for the cadre AT, T, Qaria, PET, DM who were appointed in 2018 & 2019 through NTS is going to be started from 1st February 2021 at RITE Female Kunda.

In this connection you are directed to inform the teachers enlisted in the attached Annexure - A to report to RITE Female Swabi situated at Kunda Near GGHSS Kunda for their training as Induction Program being mandatory for them as per their appointment order terms and conditions and policy.

The heads of the concerned schools will be responsible to inform them well in time so the teacher in the list may report for their training on 1st Feb 2021 to the Center RITE Female Swabi situated near to GGHSS Kunda, KUNDA District Swabi. The Training is mandatory and absence from training will lead to strict disciplinary action as per rules.


All the teachers given in the attached list must attend RITE FEMALE KUNDA on 1st February 2021.
Note: Heads of the concerned schools are further directed to verify the EMIS Codes / school and CNIC No of these teachers and report if any correction is required.

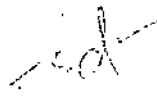
Enclosed As : Annex- A


District Education Officer
Female Swabi


Copy for information to:

1. PA to Director E& SE, KP, Peshawar.
2. Director DCTE KP, Abbot Abad.
3. Director PITTE KP, Peshawar.
4. Principal RITE Female Swabi situated at KUNDA near GGHSS Kunda with reference to this No and dated stated.


District Courts Mardan


District Education Officer
Female Swabi

S.N O	Name of Teacher	Father,s-Name	Desig	Name of School	CNIC No	EMIS Code
1	ANAR KALLI	SAID WALI SHAH	PET	GGHSS GULSHAN ABAD	16202-5347521-0	37403
2	BASRA BIBI	SAR ZAMEEN	PET	GGMS Jamal Abad	16202-8948579-4	34471
3	MADEEHA,	FAZAL-E-WAHID	PET	GGMS Marghuz	17301-1888055-8	34476
4	SABA GUL	MUHAMMAD ZADA	PET	GGMS SEEN KHEL	16202-2636770-4	40009
5	KAMNI GUL	FAZAL UR REHMAN	PET	GGMS JANGI DHIER	16202-8753598-0	41180
6	SAMIA BIBI	MUHAMMAD ANWAR	PET	GGMS KOTHA	16202-8600509-6	40866
7	ALEENA	GULZAR KHAN	PET	GGMS KULADHAND BAIKOT	16202-8848774-6	39099
8	FAREEHA ZAMAN	SHER ZAMAN KHAN	PET	GGHS JHANDA	16202-9453437-4	38414
9	ZAINAB SYED	SYED RASHEED AHMAD	PET	GGHS YOUSAFI	16202-6159968-6	39100
10	ASMA	AMIE SHER	PET	GGMS ALADHER	16201-5364345-4	40868
11	SHAHANA RAZA	RAZA MUIHAMMAD	PET	GGMS CENTER SAPROONA	16202-1652836-2	39388
12	AYESHA IRSHAD	IRSHAD ALI	PET	GGHS Gulshan Abad	16202-2356000-6	37403
13	SAMREEN	SHERIN KHAN	PET	GCMS PALO DANDA	16202-3684514-4	37175
14	SIDRA	GUL MANZAR	PET	GGMS SHAMROZ ABAD DAGAI	16202-5064289-6	38130
15	HIRA ABIDA AHMED	IFTIKHAR AHMED	PET	GGHS MALAK ABAD (GADOON)	17301-8829382-4	37013
16	SHEHLA IKRAM	IKRAM ULLAH KHAN	PET	GGHS BAZAR	17301-5724701-2	38141
17	SANA HABIB	HABIB KHAN	PET	GGMS JUMA KHAN GARHI MAINI	35201-6985743-0	37250
18	GUL RUKH	MUHAMMAD QAMAR	PET	GGMS DAGAI	16204-9619217-6	37145
19	HINA MUMTAZ	MUMTAZ AHMAD	PET	GGMS OCH KHWAR	16201-5784607-4	41177
20	SONIA SALEEM	MUHAMMAD SALEEM	PET	GGMS KALABAT	16203-9611881-4	41195
21	ANUM GUL	IMTIAZ AHMAD	PET	GGMS GAJAI (GADOON)	41308-5714362-0	37019


 Advocate
 District Courts Mardan

22	GUL RUKH	AMIR BAHADAR	PET	GGMS BAKAR SERAI	16204-0596792-6	41178
23	HUMA	HIDAYATULLAH	PET	GGMS BAZARGI	16201-2071254-4	34483
24	BRIKHNA	BAKHITAR	PET	GGMS GAR PANJPIR	16202-7150856-8	39783
25	TAMJEEDA	AURANGZEB	PET	GGMS DALORI BALA	16202-4480026-4	40859
26	ZAINAB BIBI	ZAIBAR KHAN	PET	GGHSS SHAIH MANSOOR	16201-9019577-6	34480
27	SADIA GUL	MUHAMMAD ZAHID KHAN	PET	GGMS KUNDA	16201-8122204-0	37410
28	NARGAS	ABDUL GHANI	PET	GGMS NAZAR ISMAILA	16202-8030929-8	39790
29	KHUSHNAMA	IHSAN UL HAQ	PET	GGMS MASUD ABAD	16204-0570317-2	41176
30	AJMEENA	AZIZ KHAN	PET	GGMS SHER NABI BANDA	16201-0685779-8	41170
31	MEHWISH	HAJI BAHADUR	PET	GGHSS PABAINI	16202-4456199-4	37020
32	NAVEEN AKHTAR	MUHAMMAD BASHIR	PET	GGMS PAK KYA	16202-0302677-6	37746
33	NIDA RAFIQ	RAFIQ AHMAD	PET	GGMS BAZARGI	16202-0590987-4	34485
34	AYESHA ZAMAN	KHAN ZAMAN	PET	GGMS JAMRA	16201-5173659-4	39096
35	FAHMEEDA	FATEH UDDIN	PET	GGHS PANJMAN	42401-1587547-0	38136
36	NIDA	MUHAMMAD SARDAR	PET	GGHS DODHER	61101-1990686-6	37021
37	TABASSUM HUMA	MUHAMMAD HUMAYUN KHAN	PET	GGHS PEHUR HEMLET	16202-6636095-6	34475
38	MILKA	SAEED ULLAH	PET	GGMS NARANJI	16202-8710725-2	38606
39	HASEEBA BIBI	JEHAN ZEB KHAN	DM	GGMS KALABAT	17301-7072814-6	41175
40	AFSHANA BIBI	SAIF UR REHMAN	DM	GGMS KADDI DAGI	16204-0583977-4	40869
41	TEHREEM	SABIR KHAN	DM	GGMS DANDOQA	16202-3236792-4	39095
42	MEHREEN IKRAM	IKRAM ULLAH KHAN	DM	GGMS Sher Nabi Banda	17301-8813783-0	41170
43	SALMA KHAN	HIDAYAT ULLAH	DM	GGMS Mahra Bachai	16202-1295352-6	34475
44	FARYAL BAHADAR	SHER BAHADAR	DM	GGMS BAKAR SERAI	16202-3855477-2	41178
45	SAHIBZADI AALIA GUL	SAHIBZADA SAEED AHMAD	DM	GGMS SAPROONA	16202-1890853-4	37404
46	NAYAB ALI KHAN	FARMAN ALI	DM	GGMS OCH KHWAR	16101-8098334-8	41177

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Fahma
Ullah

47	AMMARA WAHAB	RAHM UL WAHAB	DM	GGPS ZAHIR ABAD	16201-6455131-0	23995
48	ABRI SHEEMA	SAFDAR ALI	DM	GGMS ALADHER	16202-3715712-8	40868
49	YUSRA KARIM	FAZLI KARIM	DM	GGMS MASUD ABAD	16204-0588976-6	41178
50	FARZEENA GUL	AFZAL KHAN	DM	GGMS JANGI DHER	16202-4052198-6	41180
51	HASEENA AKHTAR	SYED AKHTER SHAH	DM	GGMS GAR PANJPIR	16202-5692267-0	39783
52	SHABANA ALAM	ALAM ZEB	DM	GGMS JAMRA	16202-6919856-6	39096
53	KANA PERVEN	MUHAMMAD SALEEM	AT	GGMS KALABAT	16202-9355370-2	41175
54	ZAINAB	AMROOD KHAN	AT	GGMS MARGHUZ	16202-7762608-6	34476
55	AMNA NAZ	FAZAL BAHADAR	AT	GGMS BAZAR	16203-2011317-2	38141
56	AMINA BIBI	IHSAN ULLAH	AT	GGMS BASHARAT ABAD	16204-2061491-8	40870
57	SARA	NAJEEM KHAN	AT	GGMS KADDI DAGI	16202-3988161-0	40869
58	NAILA NOREEN	SHER ALI KHAN	AT	GGMS SHAHDAD KILLI	16202-9922681-6	40211
59	RESHMA	ZUBAIR KHAN	AT	GGMS BAKAR SERAI	16202-8602340-2	41178
60	NOSHIN	IHSAN MUHAMMAD	AT	GGMS JANGI DHER	16202-9431081-6	41180
61	FARZIA	MUHAMMAD SAEED	AT	GGMS HARYAN	16202-6722373-0	34487
62	HAMSIA BIBI	WAFADAR KHAN	AT	GGMS TOR DHER	16201-0685495-4	35140
63	NAZIA BIBI	IBRAHIM SHAH	AT	GGMS SHER NABI BANDA	16202-2308488-2	41179
64	NOORIN QAIM	MUHAMMAD QAIM	AT	GGMS ALADHER	16202-5906580-8	40868
65	MADIHA GUL	ZARNAIS KHAN	AT	GGMS SHERA GHUND	16202-8936681-0	37106
66	SHEEBA SOHNI	KHILR SHAID	AT	GGMS MASUD ABAD	16202-1654706-0	41176
67	ANDALEEB ANWAR	MOHAMMAD ANWAR	AT	GGMS Bal Banda yaqubi	16202-2387510-4	
68	AMBREEN JAVAID	NASEEM JAVAID	AT	GGMS KOTHA	37405-8310612-8	40866
69	SHABANA KHALIQ	FAZLE KHALIQ	AT	GGMS JALBAI	16202-9617608-2	36293

25

Mahmood Talib Khan

Mahmood Talib Khan
 Addressee
 District Courts Mardan

70	SAMIA KHALIL	KHALIL UR RAHMAN	Qaria	GGHS ZAIDA	16202-7714086-2	36276
71	KHALIDA BEGUM	SAID RAZIQ	Qaria	GGHS DODHER	16202-5354880-8	37021
72	RAHEELA IQBAL	IQBAL MUHAMMAD	Qaria	GGHS BAZAR	16202-4009488-3	58141
73	MARIA GOHAR	GOHAR KHAN	Qaria	GGHS LAHOR SHARQI	16101-7894506-0	34490
74	JASMIN ARA	FAZAL ILAHI	Qaria	GGHSS SHEWA	16101-2615496-4	36387
75	SORIA KHAN	ALI GOHAR KHAN	Qaria	GGHS MANGAL CHAI	16203-0613053-2	74474
76	ANAR KALI	HAKHEEM KHAN	TT	GGMS MANAGI	16202-0764201-2	40863
77	ZAINAB KHATOON	MOHAMMAD SIYAR	TT	GGHS YAR HUSSAIN	16202-6677334-0	36294
78	HALEEMA	KHAN GHALIB	TT	GGHS LAHOR SHARQI	16201-4383027-0	34190
79	FARZANA	ATAB KHAN	TT	GGMS NAKANI	16202-0452239-2	38606
80	WAGMA	AWAL SHER	TT	GGMS THANDKOT	16202-1274795-8	38807
81	FATIMA SOHEBA	SAID UL ABRAR	TT	GGMS KOTHA	16203-5578638-6	40860
82	MUSARRAT SHAHEEN	SARDAR NAWAB	TT	GGMS LAHOR	16201-7177152-4	10869
83	LUBNA MARYAM	SHER AMAN KHAN	TT	GGMS BASHARAT ABAD	16201-1814981-2	10870
84	MEHREEN ANWAR	ANWAR SHER	TT	GGMS Marghaz Serai	16202-9682221-4	11183
85	SHAKEELA NAZ	KHAIR MUHAMMAD	TT	GGMS GULO DHERI	16202-0889105-0	40865
86	HENA	DUR JAMIL KHAN	TT	GGMS SHAHDAD KILLI	16201-5137405-0	40211
87	FATIMA TU ZOHEBA	FAZAL GHAFOR	TT	GGMS CENTER SAPROONA	16201-4923302-2	39788
88	RAHEELA	SARFRAZ KHAN	TT	GGMS MARGHAZ	16201-4234150-0	34476
89	SAFEDA BEGUM	SHER BAHADAR KHAN	TT	GGHS BARYAN	16201-2343752-0	34487
90	NOSHEEN AHMAD	JAMIL AHMAD KHAN	TT	GGHS DAGAI GADOON	16203-0588095-6	39792
91	TANZILA BAGEES	MU TAHIR SHAH	TT	GGMS MUSA BANDA	16202-6918871-2	40861

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Zalika Khan

92	KHADIJA JAWAD	JAWAD KHAN	TT	GGHS DARRA	16202-5570853-2	39741
93	SUMAIRA NAZ	MIR WALI KHAN	TT	GGMS DULAT	16202-5042748-8	34486
94	NADIA NAZ	GOHAR ALI	TT	GGMS ALADHER	16201-2028275-6	40868
95	ASMA	MUHAMMAD AFSAR	TT	GGMS URMAI DHERI	16201-4593654-2	40210
96	SHAGUFTA GUL	ZAREEN GUL	TT	GGMS KHESHA MEHER ALI	16202-1246624-0	39097
97	ASIA REHMAN	SAID REHMAN	TT	GGHS KALU DHER	16202-3373444-2	37175
98	AMBARIN	HUSSAIN GUL	TT	GGMS GHULAMA	16202-0560176-8	40862
99	TAHIRA BEGUM	SARAJ AHMAD	TT	GGMS PAK KYA	16202-5008105-0	37746
100	AISHA BIBI	SAID KAMAL	TT	GGMS Kalabat	16202-1505381-2	39768
101	GUL NAZ BEGUM	SAID QURASHI	TT	GGMS BAKAR SERAI	16202-9838498-8	41178
102	ABGEENA SHAHEEN	QAMAR ZAMAN	TT	GGMS BADA	16203-0605501-8	40214
103	JAMILA BEGUM	ABDUR RAUF KHAN	TT	GGMS KARDARO	16201-9140900-0	40860
104	TAHIRA KHAN	KHAN ZAMAN	TT	GGHS MANGAL CHAI	16201-3145113-2	34474
105	SAIMA SIRAJ	SIRAJ AKBAR	TT	GGMS DHAB KORONA	16201-6070036-6	40867
106	NANSY GUL	JEHAN ROZ	TT	GGMS GAJAI (GADOON)	16202-3099926-6	37019
107	SAINA	MUHAMMAD SIYAR	TT	GGHS ZAIDA	16201-4858526-2	36226
108	SHAGUFTA	AMAN ULLAH	TT	GGMS CHANAI	16202-6575217-8	40212
109	HINA HADY	ADUL HADY	TT	GGMS GABASNI	16202-1217364-8	40010
110	ABIDA	ABDUL HALEEM	TT	GGMS SEEN KHEL	16202-5645808-8	40000
111	RIASAT	SHERIN KHAN	TT	GGMS PALODHAND	16202-2560354-2	37176
112	AZRA TABASSUM	AMEER ZAIDA	TT	GGMS LANGI DHER	16201-2543811-4	41180
113	ANJUM SIKANDAR	SIKANDAR ZEB	TT	GGMS BEASAK	16203-0885728-4	39789


(27)

*Zahra
Ullah*

Advocate
District Courts Mardan

(27)A

Induction Result

IP Title	INDUCTION PROGRAM-2
Result Date/Timing	24-SEP-2022 / 12:45
IP Cadre	TT (BPS-15)
Roll No	460
Center Name	RPDC (Female) Swabi.
Total Marks	850
Obtained Marks	623
Percentage	73.29 %
Remarks	PASS
Result Status	Result Available 

Muhammad Faraz Khan
Advocate
District Courts Mardan

Annex-G

28

Dist. Govt. KP-Provincial
District Accounts Office Swabi
Monthly Salary Statement (February-2022)

Personal Information of Mr SAINA ASIF w/s of ASIF IJAZ
 Personnel Number: 00921846 CNIC: 1620148585202 NTN:
 Date of Birth: 01.02.1985 Entry into Govt. Service: 02.09.2019 Length of Service: 02 Years 06 Mths 09 Days

Employment Category: Active Temporary
 Designation: THEOLOGY TEACHER 80004627-DISTRICT GOVERNMENT KHYBER
 DDO Code: SU6419-Principal GGHS Zaida Swabi Cash Center:
 Payroll Section: 005 GPF Section: 001 GPF Interest Free GPF Balance: 0.00
 Vendor Number: -

Wage type		Amount	Wage type		Amount
0001	Basic Pay	16,120.00	1001	House Rent Allowance 15%	2,418.00
1210	Convey Allowance 2005	2,856.00	1500	Medical Allowance	852.00
1211	Adhoc Relief All 2016 10%	1,351.00	2224	Adhoc Relief All 2017 10%	1,012.00
2347	Adhoc Relief All 2018 10%	1,612.00	2261	Adhoc Relief All 2019 10%	1,209.00
2309	Adhoc Relief All 2021 10%	1,612.00	2516	Teaching Allowance 2021	1,209.00

Deductions - General

Wage type	Amount	Wage type	Amount
-----------	--------	-----------	--------

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till FEB-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 35,023.00 Deductions (Rs.): 0.00 Net Pay: (Rs.): 35,023.00

Payee Name: SAINA ASIF
 Account Number: 05002-008
 Bank Details: THE BANK OF KHYBER, 080118 ISLAMIC BANKING BRANCH, SWABI SWABI SWABI

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
 City: SWABI Domicile: Housing Status: No. Other:
 Temp. Address:
 City: Email: sainasif61@gmail.com

Talib Khan

System generated document in accordance with APPM 4.6 12.9(23242822 01.2022) 2.11
 * All amounts are in Pak. Rupee.
 ** Errors & omissions are void (SKBR/EN/28/01/2022/2, B/01)

Dist. Govt. KP-Provincial
District Accounts Office Swabi
Monthly Salary Statement (March-2022)



Personal Information of Mr SAINA ASIF d/w/s of ASIF IJAZ

Personnel Number: 00921846 CNIC: 1620148585202
 Date of Birth: 01/02/1985 Entry into Govt. Service: 02/09/2019

NTN:
 Length of Service: 02 Years 07 Months 000 Days

Employment Category: Active Temporary

Designation: THEOLOGY TEACHER 80004627-DISTRICT GOVERNMENT KHYBE

DDO Code: SU6119-Principal GHS Zaida Swabi

Payroll Section: 003 GPF Section: 001

GPF A/C No: GPF Interest Free

Vendor Number: -

Cash Center:

GPF Balance: 0.00 (provisional)

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: C-1 BPS: 15 Pay Stage: 0

Wage type		Amount	Wage type		Amount
0001	Basic Pay	16,120.00	1001	House Rent Allowance 45%	3,524.00
1210	Convex Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2211	Adhoc Relief All 2016 10%	1,351.00	2224	Adhoc Relief All 2017 10%	1,612.00
2247	Adhoc Relief All 2018 10%	1,612.00	2264	Adhoc Relief All 2019 10%	1,612.00
2309	Adhoc Relief All 2021 10%	1,612.00	2316	Teaching Allowance 2021	3,224.00

Deductions - General

Wage type	Amount	Wage type	Amount
-----------	--------	-----------	--------

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till MAR-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 35,023.00 Deductions: (Rs.): 0.00 Net Pay: (Rs.): 35,023.00

Payee Name: SAINA ASIF

Account Number: 05002-008

Bank Details: THE BANK OF KHYBER, 080118 ISLAMIC BANKING BRANCH, SWABI, SWABI, SWABI

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: SWABI

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: sainuasi061@gmail.com

Muhammad Taha Khan
Advocate
District Courts Mardan

System generated document in accordance with APPM 4.6.12 9/23/2028/25.03 2022A.3.10
 * All amounts are in P.A. Rupees
 * Errors & omissions excepted (SERVICE/SAO/04/2022/15,38/10)

Anx-
H
(29)

DISTRICT EDUCATION OFFICE
(FEMALE) SWABI
Phone No: 0938-280339
Email: emisfswabi@yahoo.com

NOTIFICATION.

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 Theology teacher (TT) BPS-15 is hereby extended for the period with effect from 01-09-2020 to 31-08-2021 on School based in BPS-15 (P.S. 16120-1320-56020) @ RS.16120/- fixed plus usual allowances as admissible under the rules on ad-hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:-

Theology teacher

S.No	Name of Teacher	Father's Name	C.N.C No	Total Score NTSF Acad	Design.	School of Posting	Appointment Order No & Date
1	Saima Agha	Muhammed Syar	16201-4858520-2	98.2	TT	GGHS Zaida	3993-G/29-07-2019

TERMS AND CONDITION.

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. The Extension will not be in favour of those who have not completed one year of service w.e.f. 01-09-2020 to 31-08-2021 or has remained absent from duty or resigned from services and also not for those who were under any proceedings.
4. Appointment is purely on temporary & contract basis initially for one year w.e.f. 1st September, 2020 to 31st August, 2021.
5. Her services are liable to termination on one month pay/allowances shall be forfeited to the Government.
6. She will be governed by such rules and regulations as may be issued from time to time by the Government.
7. Her service shall be terminated at any time in case her performance is found unsatisfactory during her contract period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. All the terms and conditions of her appointment order will remain intact.

(SOFIA TABASSUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst No. 3434-40 /AT/Adhoc/Appnt Dated Swabi the 31/12/2020

Copy forwarded for information and necessary action to:-

1. Director Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar.
2. District Accounts officer Swabi.
3. PS to the secretary to Govt. of Khyber Pakhtunkhwa E&SE Department.
4. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
5. Account Branch Local Office.
6. Principals/Gen. Mistress concerned.
7. Offices concerned.

District Councils Mardan

DISTRICT EDUCATION OFFICER
(FEMALE) SWABI



Phone No: 0938-280339

DISTRICT EDUCATION OFFICE (FEMALE) SWAB

Email: emisfswabi@yahoo.com

Ann - I

(30)

NOTIFICATION.

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 Theology teacher (TT) BPS-15 is hereby extended for the period with effect from 1st January, 2021 to 31 December, 2021 on School based in BPS-15 (Rs.16120-1330-56020) @ RS.16120/- 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:-

Theology teacher

S.No	Name of Teacher	Father's Name	CNIC No	Total Score NTS+ Acad	Design.	School of Posting	Appointment G. No & Date
1	TAHIRA KHAN	KHAN ZAMAN	16201-5145133-2	123.99	TT	GGHS MANGAL CHAI	8642-G/31-12-2
2	RABEELA	SARFRAZ KHAN	16201-4234150-0	126.78	TT	GGMS PAK KYA	8642-G/31-12-2
3	SUMAIRA NAZ	MIR WALI KHAN	16202-5042748-8	126.01	TT	GGMS DULAT	8642-G/31-12-2
4	SAEEDA BEGUM	SHER BAHADAR KHAN	16201-2342752-0	126.78	TT	GGHS HARYAN	8642-G/31-12-2
5	HALLEEMA	KHAN GHALIB	16201-4383027-0	131.92	TT	GGHS LAHOR SHARQI	8642-G/31-12-2
6	ZAENAB KHATOON	MOHAMMAD SIYAR	16202-6677334-0	134.68	TT	GGHS YAR HUSSAIN	8642-G/31-12-2
7	NANSY GUL	JEHAN ROZ	16202-3099926-6	125.33	TT	GGMS GADAI (GADOON)	8642-G/31-12-2
8	ASIA REHMAN	SAID REHMAN	16202-3373444-2	125.24	TT	GGHS KALI DHIR	8642-G/31-12-2
9	TAHIRA BEGUM	SARAJ AHMAD	16202-5008105-6	125.02	TT	GGMS GGMS MARGHUZ	8642-G/31-12-2
10	PARZANA	AJAB KHAN	16202-0452239-2	130.06	TT	GGMS NARANJI	8642-G/31-12-2
11	HAGMA	AWAL SHER	16202-1274795-8	129.93	TT	GGMS THANDKOI	8642-G/31-12-2
12	SILAGUFTA GUL	ZAREEN GUL	16202-1246624-0	125.37	TT	GGMS KHUSHA MEHER ALI	8642-G/31-12-2
13	MEHREEN ANWAR	ANWAR SHER	16202-9684223-4	128.58	TT	GGMS SERAH BANDA MARGHUZ	8642-G/31-12-2
14	FATIMA TU ZOHRA	FAZAL GHAFUOR	16201-4923302-2	126.87	TT	GGMS CENTER SAIROONIA	8642-G/31-12-2
15	KILADIA JAWAD	JAWAD KHAN	16202-5570853-2	126.24	TT	GGHS DARRA	8642-G/31-12-2
16	NOSHEEN AHMAD	JAMIL AHMAD KHAN	16203-0588095-6	126.34	TT	GGHS DAGAI GADOON	8642-G/31-12-2
17	ABIDA	ABDUL HALEEM	16202-5645808-8	119.47	TT	GGMS SEEN KHEI	8642-G/31-12-2
18	HENA HADY	ABDUL HADY	16202-1217364-8	127.09	TT	GGMS Kandi Dagai	8642-G/31-12-2
19	ASMA	MUHAMMAD AFSAR	16201-4593654-2	125.47	TT	GGMS URMAL DHIRI	8642-G/31-12-2
20	HENA	DUR JAMIL KHAN	16201-6137405-0	127.9	TT	GGMS SILABDAD KHILLI	8642-G/31-12-2
21	ARGEENA SHAHEEN	QAMAR ZAMAN	16203-0605501-8	134.59	TT	GGMS BABI	8642-G/31-12-2
22	JAMILA BEGUM	ABDUR RAUF KHAN	16201-9140900-0	124.25	TT	GGMS KANDARO	8642-G/31-12-2
23	TANZILA BALQEES	MUTAHIR SHAH	16202-0315871-2	126.29	TT	GGMS MUSA BANDA	8642-G/31-12-2
24	AMBARIN	HUSSAIN GUL	16202-0560176-8	125.17	TT	GGMS GHULAMA	8642-G/31-12-2
25	ANAR KALI	HAKHEEM KHAN	16202-0764201-2	137.79	TT	GGMS MANGI	8642-G/31-12-2
26	SILAKEELA NAZ	KHAIR MUHAMMAD	16202-0889105-0	128.25	TT	GGMS GULO OHEBI	8642-G/31-12-2
27	FATIMA SUGHRA	SAID UL ABRAR	16203-0578638-5	129.64	TT	GGMS KODLA	8642-G/31-12-2
28	SAHMA SIRAJ	SIRAJ AKBAR	16201-6070036-6	123.72	TT	GGMS BILAL KORONA	8642-G/31-12-2
29	NADIA NAZ	GHILAR ALI	16201-2428275-6	123.68	TT	GGMS ALADHER	8642-G/31-12-2

Sub-Manager, District Courts
District Courts Mardan

[Signature]

Ann. J

Extraordinary

REGISTERED No. PIII

(38)

Government

GAZETTE

KHYBER PAKHTUNKWA

Published by Authority

Peshawar, Tuesday, 28th September, 2022.

PROVINCIAL ASSEMBLY SECRETARIAT KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar the 20th September, 2022.

No. PA/ Khyber Pakhtunkhwa/ Bills. 245/ 2022/4642. The Khyber Pakhtunkhwa Teachers (Appointment and Regularization of services Bill, 2022 having been passed by the Provincial Khyber Assembly Khyber Pakhtunkhwa on 12th September, 2022 and assented to by the Governor of the Khyber Pakhtunkhwa on 16th September, 2022 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

The Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022. Khyber Pakhtunkhwa act No. XLI of 2022).

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazettee of the Khyber Pakhtunkhwa. (Extraordinary) dated the 20th September, 2022).

AN ACT

To provide for the appointment and regularization of the services of certain teachers appointed on ad hoc contract basis in the Elementary and secondary Education Department in the province of Khyber Pakhtunkhwa

Whereas it is expedient to provide for the appointment and regularization of the services of certain teachers appointed on ad hoc contract basis in the Elementary and Secondary Education Department in the Province of Khyber Pakhtunkhwa in the public interest.

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows:

1. Short title, application and commencement. This Act may be called the Khyber Pakhtunkhwa. (Extraordinary) dated the 20th September, 2022).

(2) It shall apply to all the teachers as defined in clause (d) of sub section of Section 2 of this Act.

(3) It shall come into force at once.

2. Definitions (1) in this act, unless the context otherwise requires.

[Handwritten signature and stamp]

KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 20TH SEPTEMBER, 2022.

(a) "Government" means the Government of Khyber Pakhtunkhwa,
 (b) "law or rules" means the law or rules, for the time being in force, governing the selection and appointment of civil servants:
 (c) "post" means a post of teacher in the Elementary and Secondary Education Department: and

(d) "teachers" mean duly qualified persons, who are appointed as Primary School Teachers, Certified Teachers, Drawing Masters, Physical Education Teachers, Theology Teachers, Arabic Teachers, Qari/Qaria Teachers, Certified Teachers IT, Primary Teachers and Secondary School Teachers, having different pay scales, in the Elementary and Secondary Education Department, on ad-hoc/contract basis, through National Testing Service/the Khyber Pakhtunkhwa Educational Testing and Evaluation Agency (ETEA) or any other testing service, but does not include the teachers engaged on work charge basis or who are paid out of contingencies or engaged by Parent Teachers Council.

(2) The expressions "ad-hoc appointment" shall have the same meaning as is respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. Regularization of services of teachers.---(1) Notwithstanding anything contained in any law or rules, for the time being in force, all the teachers, who are holding various posts from 08.03.2017 till the commencement of this Act, shall be validly appointed, on regular basis, from the date of their initial appointment: provided that.

(a) they possess the same qualification and experience required for a regular post:

(b) they have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground, before the Commencement of this Act:

(c) the service promotion quota of all service cadres shall not be affected; and

(d) they shall be entitled for seniority and pay from the date of their initial appointment on ad-hoc/contract basis

(2) The services of the teachers shall be deemed to have been regularized only on the publication of their names in the official Gazette.

4. Overriding effect. Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules, to the extent of inconsistency to this Act, shall cease to have effect.

BY ORDER OF MR. SPEAKER
 PROVINCIAL ASSEMBLY OF KHYBER
 PAKHTUNKHWA

(KIFAYAT ULLAH KHAN AFRIDI)
 Secretary
 Provincial Assembly of Khyber

Ali
Amir
M

(Signature)

Annex K

OFFICE OF THE HEAD MISTRESS GGHS ZAIDA

34


DUTY CERTIFICATE

It is to certify that MISS SAINA D/O MUHAMMAD SIYAR appointed as TT BPS-15 at GGHS Zaida vide DEO Female Swabi No:3993-G/DA-II Dated 29-07-2019. (Order Attached)

Extension Order issued vide DEO Female Office No: 3434-40 Dated 31-12-2020 for the period for 01-02-2020 to 31-08-2021.

She is still on duty and working in GGHS Zaida at TT .

Dated: 01-03-2021


PRINCIPAL
Govt. Girls High School
GGHS ZAIDA
03/03/2021



District Courts Mardan

Annex-L

بخدمت جناب، ڈی ای او ضلع سوابی زنانہ
عنوان: ماہانہ تنخواہ کی غیر قانونی بندش۔

(35)

جناب عالی:

گزارش ہے کہ مذکورہ مورخہ 01-09-2019 سے گورنمنٹ گریڈ ہائی سکول زیدہ میں بطور
بچی لیٹیج پیرتھینا رہنے والی ہو کہ بریفنگ جی سیل ایل اے علی کہ اپنی تنخواہ 2022-04-01 سے بند ہو چکی ہے۔
حالانکہ وہ یہ اپنی ڈیوٹی بخوبی سرانجام دے رہی ہے۔ جسکی کسی تصدیق متعلقہ سکول اہلکار کسی بھی وقت کی
مبطلتی ہے۔

مزید برآں کرم انکوائری کے حوالے سے سارے اور بیک نل آرڈرز دستاویزات متعلقہ انکوائری افسر کو پیش کر
دیں۔ جو فست میں موجود ہے۔ لہذا انکی تہ ذمہ داری نہیں ہوگی۔

استدعا کی جاتی ہے کہ مذکورہ کی تنخواہ سپریم کورٹ آف پاکستان کے حکم کی روشنی میں
واک گزاری کی جائے جس میں بتایا گیا ہے۔ جو بندہ ڈیوٹی پر موجود ہوتا ہے اسکی تنخواہ بند نہیں کی جاتی۔

بہت سے بار بار دستاویزات متعلقہ افسر کو پیش کیے گئے ہیں۔ لیکن وہ اسکا حکم بند نہ کرتے۔

الغرض

میں فوراً گزارش ہوگی۔

تاریخ: 19-04-2022

مذکورہ دستاویزات گورنمنٹ گریڈ ہائی سکول زیدہ، سوابی (بی پی ایس 15)

Talib
Khan

Advocate Talib Khan
Advocate
District Courts Mardan



DISTRICT EDUCATION OFFICE (FEMALE) SWABI

Phone No: 0938-280339

Email: emjswabi@yahoo.com



/deofswabi



Notification:

1. Whereas the competent authority MS: SOFIA TABASSUM DEO (F) Swabi, during perusal of record, got suspected on her initial recruitment and found that some teachers of various cadres (CT, CT-IT, TT Qaria), have been appointed on extraneous grounds during 2019 & 2020.
2. AND Whereas, the office constituted a fact-finding enquiry committee vide DEO (F) Swabi Endstt No 462 Dated 14/02/2022 and Endstt N0 658-61 Dated 04-03-2022.
3. AND whereas the committee carried out a comprehensive enquiry wherein a full opportunity of defense without any prejudice and fear of reprisal, was provided to the teacher under enquiry. The committee submitted its report to the competent authority wherein the committee declared the appointment orders as flying, fake and bogus. The main apple of discord behind the whole illegal flying, fake and bogus appointments in the office, Mr. Saleem Akhtar Ex-APO was held responsible for all that.
4. AND Whereas the DEO (F) Swabi sent a report regarding appointments on extraneous grounds to the worthy Director E & Sec Education Peshawar consequent upon which vide Endstt No. 789-92/A-23/complaint /Mardan vol-II/2021 Dated Peshawar, Mr. Sharif Gul Principal BPS-19 was nominated as enquiry officer.
5. AND Whereas the enquiry officer conducted his enquiry, wherein he affirmed and agreed with the enquiry report already conducted by DEO (F) Swabi as mentioned above, submitted to the Director E & SED Khyber Pakhtunkhwa vide No. 116 Dated 29/06/2022.
6. AND Whereas the Director E & SED Peshawar, directed the undersigned to disown the appointment order of fake and bogus teachers vide No 1577/A-23/MS/complaint/ Mardan/vol-II/2021/KC.
7. AND Whereas MS: SAINA was appointed as TT under 2% disabled quota vide Endstt No. 3993-G/DA-II Dated 29/07/2019. Astonishingly, in the same Endstt No., she has also been appointed as TT without mentioning disabled. No disabled vacant post was advertised. She has no disability certificate or other evidence either with her or the office record. She affirmed in writing that she was not disabled. Her appointment is on adhoc contract base.
8. Now therefore, in exercise of Powers conferred under the Khyber Pakhtunkhwa Govt servant (Efficiency and discipline) rules, 2011, I, MS: SOFIA TABASSUM DEO (F) Swabi, being competent authority, am of the opinion to disown the flying, fake and bogus appointment order in r/o MS: SAINA TT GGHS Zaida (Swabi) in the best public interest.

(SOFIA TABASSUM)
District Education officer
Female Swabi

Endst. No. 1914-1918 /File, Dated: 05/08/2022

Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Department KPK Peshawar.
2. District Account Officer Swabi.
3. District Monitoring officer Swabi.
4. Superintendent local office.
5. Principal GGHS Zaida (Swabi)
6. MS: SAINA d/o Mr. Muhammad Siyar, VPO Yar Hussain, Tehsil Razzar, District Swabi under the register cover.

District Education office
Female Swabi

To

The Director,
Elementary and Secondary Education KP Peshawar
At Directorate of E&SED Hashtangari Chowk, Near
Qila Bala Hisar Peshawar.

Ann-N

(37)

Subject: Departmental appeal against the notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022 wherein the DEO(F) Swabi has opined to disown the appointment order of the appellant which is illegal against law and facts.

PRAYER: On acceptance of this departmental appeal, impugned notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022 wherein the DEO(F) Swabi has opined to disown the appointment order of the appellant may please be set aside and appellant may please be reinstated in service with all back benefits.

Respected Sir,

Appellant humbly submits as under:

1. That appellant was appointed as Theology Teacher (TT) in BPS-15 vide w.e.f 01/09/2019 vide appointment order dated 29/07/2019 which is duly signed by the DEO(F) Swabi (Copy of the appointment order dated 01/09/2019 is attached as Annexure A)
2. That appellant was appointed as TT after due recommendation of the Departmental Selection Committee wherein the minutes of the meeting dated 28/07/2019 clearly states that all codal formalities have been completed for appointment and the appellant is recommended for appointment on merit (Copy of the minutes of the Departmental Selection Committee meeting dated 28/07/2019 is attached as Annexure B)
3. That after observing all codal formalities and due verification, the District Education Officer (Female) Swabi issued the pay release order dated 25/09/2019 of the appellant (Copy of the pay release order dated 25/09/2019 is attached as Annexure C)
4. That appellant performed her duty to the entire satisfaction of her superiors and was holding the post of Theology Teacher (TT) in GGHS Zaida Swabi.



District Court's Mardan

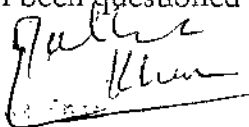
- (38)
5. That the District Education Officer (F) Swabi extended the contract period of the appellant vide notification dated 31/12/2020 (Copy of the notification dated 31/12/2020 is attached as Annexure D)
 6. That the appellant at the time of appointment was given the assurance by the Department that the contractual service of the appellant would be regularized as the services of other similarly placed employees and previous employees have been regularized by the Department and to this effect a resolution has been passed by the Provincial Assembly of KP to regularize the services of all employees and therefore the services of the appellant are to be considered as regular.
 7. That the Head Mistress GGHS Zaida has issued a duty certificate dated 01/03/2021 in respect of the appellant wherein she affirmed that the appellant is on duty at GGHS Zaida as TT (Copy of the duty certificate dated 01/03/2021 is attached as Annexure E)
 8. That the salary of the appellant was stopped, for release of salary the appellant submitted an application dated 19/04/2022 (Copy of the application dated 19/04/2022 is attached as Annexure F)
 9. That appellant performed duty and received salaries as Theology Teacher while being posted at GGHS Ziada Swabi (Copy of the monthly salary statement is attached as Annexure G)
 10. That neither any inquiry was conducted nor the appellant was associated with any such inquiry.
 11. That vide notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022, the DEO(F) Swabi has opined to disown the appointment order of the appellant which is illegal against law and facts (Copy of the notification dated 05/08/2022 is attached as Annexure H)
 12. That the impugned notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022 is illegal against law and facts on the following grounds:

GROUND:

- A. Because appellant is innocent and falsely charged.
- B. Because appellant was not associated with the enquiry proceedings nor any witness was examined in presence of the appellant nor appellant was confronted with any documents/record.


Muhammad Tahir
Advocate
District Courts Mardan

- C. Because appellant has neither been charge sheeted nor statement of allegation has been issued to the appellant nor show cause notice has been given to the appellant.
- D. Because the concerned officers were neither interrogated nor arrayed as an accused in the instant case which is a glaring illegality and appellant being a low-paid employee has been made a scapegoat.
- E. Because all codal formalities have been completed and appellant is eligible for the post of Theology Teacher (TT).
- F. Because the whole inquiry and the whole proceedings are illegal as appellant cannot be targeted alone while excluding all the concerned government servants, their DEOs(F), the DA II/EMIS etc which is against the judgments of the Honorable Supreme Court of Pakistan and the appellant alone cannot be made a scapegoat.
- G. Because a vested right in favour of the appellant has been created wherein I have performed duty for almost 03 years and I cannot be divested of the same.
- H. Because the principle of Audi Alteram Partem is to be read into every statute.
- I. Because as per the principle of Audi Alteram Partem (No one can be condemned unheard), which principle has beend defeated in the instant case as the appellant has neither been charge sheeted, nor statement of allegation has been issued nor show cause notice has been issued nor any opportunity of hearing has been afforded nor the appellant has associated with any inquiry nor any witness has been examined in presence of the appellant nor any opportunity of cross examination has been provided.
- J. Because the appointment order has been passed after observing all codal formalities and in accordance with law and once the appointment order has been acted upon and the appellant has performed duty for almost 03 years, then the Department cannot back-track as per principle of locus poenitentiae as a vested right has been created in favour of the appellant.
- K. Because there is no provision of disowning an appointment order in service laws/ Govt Servant E&D Rules 2011.
- L. Because the DEO(F) Swabi has transgressed her authority by issuing the impugned notification.
- M. Because there is no reason much less plausible for disowning the appointment order.
- N. Because the DEO(F) Swabi who signed the appointment order has not even been questioned to this effect.


 Muhammad Talib Khan
 Advocate
 District Courts Mardan

- O. Because appellant has no approach to the official record of Education Department.
- P. Because the DEO(F) Swabi who signed the appointment order has never been inquired about the appointment order and she has never disowned the said appointment order and in such eventuality, the disowning of appointment order by the current DEO(F) Swabi has no legal significance and illogical.
- Q. Because appellant is jobless and entitled for back benefits.

(40)

It is therefore humbly prayed that on acceptance of this departmental appeal, impugned notification bearing Endst No 1914-1919/File dated 05/08/2022 passed by District Education Officer Female Swabi received on 15/08/2022 wherein the DEO(F) Swabi has opined to disown the appointment order of the appellant may please be set aside and appellant may please be reinstated in service with all back benefits.

Appellant SA
 Saina D/O Muhammad Siyar
 R/O Village and Post Office Yar Hussain
 Tehsil Razzar and District Swabi
 CNIC. 16201-4858520-2

Through

Amjad Ali (Mardan)
 Advocate
 Supreme Court

Dated: 05/09/2022

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Amjad Ali
 Advocate
 District Courts Mardan

بعد التجدد سروس طلبہ میں لکھنؤ

41

2023ء منجانب عدالت

2/11/23

مورخہ:

مقدمہ:

دعویٰ:

جرم:

بنام: Mst Saina

سروس ایڈیشن باجوت نہربر آفک

مقدمہ مندرجہ عنوان بالا اپنی طرف سے واسطے بیرونی وجوہات کی دیکھ کر روائی متعلقہ

ہذا ایڈیشن

ان مقام کیلئے امجد علی ایڈووکیٹ سپریم کورٹ آف پاکستان اسلام آباد

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کابل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دیئے جواب دہی اور اقبالی دعویٰ اور بصورت ڈگری کرنے اجراء وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زاریں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم بیروی یا ڈگری یکطرفہ یا ایپیل کی برآمدگی اور منسوخی نیز دائر کرنے ایپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا بلااشتہار پراختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و جانچ و جانچ

التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہوا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ بیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سنڈر ہے۔

Accepted
Tallia
Mulla

2023ء

صوبہ

2

المرقوم:

District Courts Mardan

العبد

گواہ

العبد

بمقام لکھنؤ کے لیے منظور ہے

Murad
Amjad Ali
Mulla

Amjad Ali
Mulla

S.A
Saina (Appellant)