


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 2012/2022

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1-    | 28/12/2022                | <p>The appeal of Mst. Amina presented today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on_____. Notices be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"><br/>REGISTRAR</p> |

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

Appeal No. 2012 of 2022

Mst Amina D/o Farhad Khan PST, GGPS No. 1 Pibbi District  
Nowshera.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer Female Nowshera.

..... Respondents

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Dated 24/12/2022

  
Appellant

Through

  
Kabir Ullah Khattak

  
Roeda Khan

Advocates High Court,  
Peshawar.

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
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- 2) Director Education KPK Peshawar.
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..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, FOR THE ADJUSTMENT/ALLOWING THE APPELLANT FOR PERFORMING HER DUTY WITH RESPONDENT DEPARTMENT AS THE APPELLANT HAS BEEN RESTRAINED ILLEGALLY AND WITHOUT ANY REASON FOR PERFORMING HER DUTY AGAINST WHICH THE APPELLANT FILED A DEPARTMENTAL APPEAL 27/06/2022 WHICH HAS NOT BEEN DECIDED WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**Prayer:**

On acceptance of the instant service appeal the appellant may kindly be treated accordance to law and rules by adjusting/releasing her salary as well as allowing her to performed her duty with respondent Department alongwith all back benefits.

Respectfully Sheweth: <sup>2-</sup>

**FACTS**

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as Primary School Teacher (BPS-07) at GGPS Pibbi No. 1 District Nowshera. (Copy of appointment order is attached as Annexure A).
- 2) That after appointment the appellant performed her duty with full deviation and hard work and no compliant whatsoever has been made against the appellant.
- 3) That the appellant continuously perform her duty with Department w.e.f 13/04/2010 to 30/09/2010. (Copy of charge report and attendance register are attached as Annexure B and C).
- 4) That although the appellant performed her duty regularly but the respondent Department not release the salary of the appellant from the date of charge report.
- 5) That the appellant submitted an application for the release of her salary to respondent Department in response of which the appellant has been restrained from performing her duty orally. (Copy of application is attached as Annexure-D).
- 6) That the appellant submitted another application for her adjustment/release of her salary to the respondent Department through Diary dispatch No. 655 dated

25/01/2018 in response of which the respondent Department constituted in inquiry through Diary No. 1464 dated 12/03/2018 but no response so far. (Copy of application is attached as Annexure-E).

- 7) That the appellant has been submitted Departmental Appeal on 27/06/2022 Diary No. 868 for her adjustment in response of which the respondent No. 3 DEO (Female) Nowshera constituted a committee and nominated Mst. Sajida Headmistress GGHS Dagi Qadeem Nowshera to probe into the matter and prepare detail report. (Copy of Departmental Appeal and inquiry committee are attached as Annexure-F&G).
- 8) That the above recommendation of the inquiry report are as under.
  - i) Mst Amina D/o Farhad may be reinstated in her service as soon as possible so that justice to the some extent to be provided to her.
  - ii) The period she has not perform her duty may be sanctioned as leave without pay.
  - iii) Before releasing her pay all academic and professional documents may be verified from the concerned Boards/Universities if not verified already. (Copy of inquiry report as well as statement of Headmistress and other teacher in the shape of questionnaire are attached as Annexure-H&I).
- 9) That despite the fact and after the recommendation of the inquiry officer the respondent No. 3 not adjusted the appellant still on her post.

- 4
- 10) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

**GROUNDS**

- A). That the appellant is a Civil Servant with respondent Department which has been clarified from the appointment order, medical certificate, charge report.
- B). That the appellant has never been removed nor dismissed meaning there by that the appellant is still on the strength of respondent Department.
- C) That no charge sheet no statement of allegation and no show cause notice has been issued/communicate against the appellant.
- D) That no proceeding/explanation has been received to the appellant by the respondent Department.
- E) That any other grounds will be raised at the time of arguments with the prior permission of this Hon' able court.

It is therefore most humbly prayed that On acceptance of the instant service appeal the appellant may kindly be treated accordance to law and rules by adjusting/releasing her salary as well as allowing her to performed her duty with respondent Department alongwith all back benefits.

- ~w~
- 10) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

**GROUND**

- A). That the appellant is a Civil Servant with respondent Department which has been clarified from the appointment order, medical certificate, charge report.
- B). That the appellant has never been removed nor dismissed meaning there by that the appellant is still on the strength of respondent Department.
- C). That no charge sheet no statement of allegation and no show cause notice has been issued/communicate against the appellant.
- D). That no proceeding/explanation has been received to the appellant by the respondent Department.
- E). That any other grounds will be raised at the time of arguments with the prior permission of this Hon' able court.

It is therefore most humbly prayed that On acceptance of the instant service appeal the appellant may kindly be treated accordance to law and rules by adjusting/releasing her salary as well as allowing her to performed her duty with respondent Department alongwith all back benefits.

5)  
Any other remedy which this august tribunal deems fit  
that may also onward granted in favor of appellant.


Dated 24/12/2022

  
Appellant

Through

Kabir Ullah Khattak

&

  
Roeeda Khan  
Advocates, High Court,  
Peshawar.

**Verification:**

Verified that the contents of the above appeal are true  
and correct to the best of my knowledge and belief.

  
Deponent



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

Appeal No. \_\_\_\_\_ of 2022

Mst Amina D/o Farhad Khan PST, GGPS No. 1 Pibbi District  
Nowshera.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer Female Nowshera.

..... Respondents

**ADDRESSES OF THE PARTIES**

**Appellant**

Mst Amina D/o Farhad Khan PST, GGPS No. 1 Pibbi District  
Nowshera.

**Respondents**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer Female Nowshera.

Dated 24/12/2022

Appellant

Through

Kabir Ullah Khattak

Rooeda Khan

Advocates, High Court,  
Peshawar.

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

Appeal No. \_\_\_\_\_ of 2022

Mst Amina D/o Farhad Khan PST, GGPS No. 1 Pibbi District  
Nowshera.

..... Appellant

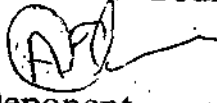
**VERSUS**

- 1) Government of KPK through Secretary Education Khyber  
Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer Female Nowshera.

..... Respondents

**AFFIDAVIT**

I, Mst Amina D/o Farhad Khan PST, GGPS No. 1 Pibbi District  
Nowshera do hereby solemnly and oath that 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

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

Appeal No. \_\_\_\_\_ of 2022

Mst Amina D/o Farhad Khan PST, GGPS No. 1 Pibbi District  
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..... Respondents

**APPLICATION FOR CONDINATION OF DELAY**  
**IF ANY**

**Respectfully Sheweth:**

**Petitioner submits as under:-**

1. That the above mentioned appeal is filing before this Hon' able Court in which no date is fixed for fixed for hearing so far.
2. That the appellant continue her duty with respondent Department w.e.f 13/04/2010 to 30/09/2010.
3. That although the appellant performed her duty regularly but the respondent Department not release the salary of the appellant from the date of charge report.

- (91)
4. That the appellant submitted an application for the release of her salary to respondent Department in response of which the appellant has been restrained from performing her duty orally.
  5. That the appellant has been submitted Departmental Appeal on 27/06/2022 Diary No. 868 for her adjustment in response of which the respondent No. 3 DEO (Female) Nowshera constituted a committee and nominated Mst. Sajida Headmistress GGHS Dagi Qadeem Nowshera to probe into the matter and prepare detail report.
  6. That the appellant there are many Judgments of the superior court that cases should be decided on merit rather than on technicalities.
  7. That the appellant has never been removed nor dismissed meaning there by that the appellant is still on the strength of respondent Department.

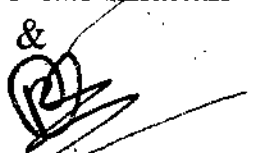
It is therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.

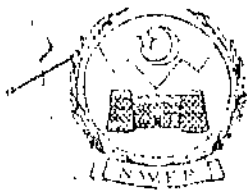
Dated: 24/12/2022

  
Appellant

Through

  
Kabir Ullah Khattak

&  
  
Roeda Khan Advocate  
High Court Peshawar



(6) Appoint

EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION  
NOWSHERA

Dated Nowshera the Friday, April-09, 2010

NOTIFICATION

Consequent upon recommendations of Departmental Selection Committee (DSC), the competent authority is pleased to appoint the following candidates as PST (Female) in the BPS-07, plus usual allowances as admissible under the rules on regular basis (but without pension and gratuity) in the schools noted against each in the interest of public service with immediate effect.

PST (Female) Open Merit (25%)

| S.No | Name / Qualification / Address                 | Father's Name      | Union Council   | Score | Name of School                      |
|------|--|--------------------|-----------------|-------|-------------------------------------|
| 1    | Aqeela Naz MA/PST, Meta Khel Khesghi Bala      | Kashmir Khan       | Khesghi Bala    | 68.46 | GGPS Mula Killi                     |
| 2    | Amna BA/PST, Pabbi Nowshera                    | Farhad Khan        | Pabbi           | 65.81 | GGPS No.1 Pabbi                     |
| 3    | Rani Gul BA/PST, Pabbi Nowshera                | Wali Muhammad      | Pabbi           | 62.38 | GGPS Khudrizar                      |
| 4    | Nadia Wahab MA/PST, Narri Jahangera            | Abdul Wahab        | Jahangira       | 62.29 | GGPS Banda Karim                    |
| 5    | Saima Begum BA/PST, Titara, Taru Jabba         | Muhammad Sharif    | Balu            | 61.74 | GGPS Nazar Muhammad Koroona Shahkot |
| 6    | Nabila Khan BA/PST, Dag Behsood                | Shah Jahan         | Dag Behsood     | 61.45 | GGPS Mera Wazir Garhi               |
| 7    | Saima Azam BA/PST, Khesghi Payan               | Fazal Azim Khan    | Khesghi Payan   | 61.37 | GGPS Ibad Gul Koroona               |
| 8    | Robina Akbar BA/PST, NSR Kalan                 | Akbar Ali          | Chowki Town     | 61.17 | GGPS Zando Banda Chel               |
| 9    | Razia Begum BA/PST, Pir Sabaq                  | Abdul Nabr         | Pir Sabaq       | 60.71 | GGPS Sher Khan Killi                |
| 10   | Uzma Ambreen FA/PST, Shaidu                    | Zari Bad Shah      | Shaidu          | 59.75 | GGPS Gandhab Inzari                 |
| 11   | Naheed Begum BA/PST, Kurvi NSR                 | Muhammad Shafi     | Kurvi           | 59.51 | GGPS Nazar Muhammad Koroona Shahkot |
| 12   | Tazeen BA/PST, Khesghi Bala                    | Muhammad Saeed     | Khesghi Bala    | 59.33 | GGPS Baba Gee Killi                 |
| 13   | Syeda Lubna Gul BA/PST, ZKK                    | Mian Insaaf ud Din | ZKK Sahib       | 59.27 | GGPS Wali Aba Khel                  |
| 14   | Neelam Jabeen BA/PST, Tarkha Akbar Pura        | Said Khan          | Akber Pura      | 59.25 | GGPS Hameed Abad J/T                |
| 15   | Fatima Begum MA/PST, Kurvi NSR                 | Muhammad Ali Khan  | Kurvi           | 59.25 | GGPS Khesari                        |
| 16   | Aisha Bi Bi BA/PST, Hisariang Mandori Nowshera | Haq Nawaz Khan     | Mandori         | 58.74 | GGPS Char Pani                      |
| 17   | Noor Jehan BA/PST, Dag Ismail Khel             | Inzar Gul          | Dag Ismail Khel | 58.43 | GGPS No.2 Spin Kani Kalan           |
| 18   | Rehana Hussain BA/PST, Khair Abad              | Mumtaz Hussain     | Khair Abad      | 58.19 | GGPS Mir Kalan                      |
| 19   | Khudija Bi Bi BA/PST, Kurvi NSR                | Sayed Bahadur Shah | Kurvi           | 58.07 | GGPS Awan Tangi Khattak             |
| 20   | Kausar Begum BA/PST, Pir Sabaq                 | Faqir Khan         | Pir Sabaq       | 58.04 | GGPS Talab Koroona                  |
| 21   | Gul Rukh Farid BA/PST, NSR Kalan               | Ghulam Farid Sawal | Nowshera City   | 58.01 | GGPS Kass Koroona                   |
| 22   | Sajida BA/PST, Khesghi                         | Abdul Mattin Khan  | Khesghi Payan   | 57.91 | GGPS Haji Bacha Koroona             |
| 23   | Saira Begum BA/PST, ZKK Sahib                  | Mehthab ud Din     | ZKK Sahib       | 57.74 | GGPS Sharif Abad Walai              |
| 24   | Seema Gul MA/PST, Rashakai                     | Khushdil Khan      | Rashakai        | 57.56 | GGPS Khelab Koroona                 |
| 25   | Ansa Usman BA/PST, Khair Abad                  | Usman Ghani        | Khair Abad      | 57.54 | GGPS Cheshmai                       |
| 26   | Zakira Yasmin BA/PST, Jallozai                 | Gul Bostan Khan    | Jallo Zai       | 57.49 | GGPS Mera Jallozai                  |
| 27   | Sultana Mir BA/PST, Aman Garh                  | Afzal              | Aman Garh       | 57.49 | GGPS Nandrak                        |
| 28   | Parveen BA/PST, Taru Jabba                     | Said Rehman        | Taru Jabba      | 57.43 | GGPS Haji Abad Shahkot              |
| 29   | Hameeda Begum BA/PST, Aza Khel, Payan          | Jehan Bahadar      | Aza Khail Payan | 57.39 | GGPS Gul Faraz Koroona Zara Miana   |
| 30   | Saba Gul BA/PST, Adamzai                       | Khan Said          | Adam Zai        | 57.34 | GGPS Masam Khel                     |
| 31   | Saneela Begum BA/PST, Mohib Banda              | Murad Ali          | Mohib Banda     | 57.33 | GGPS Tapwan Shahkot                 |

PST (Female) Earthquake Quota (5%)

| S.No | Name / Qualification / Address                            | Father's Name  | Domicile | Score | Name of School           |
|------|---|----------------|----------|-------|--------------------------|
| 1    | Robina FA/PST Vill: Baina Usaira Guz, Teh: Puran, Shangla | Mir Ahmad Khan | Shangla  | 42.92 | GGPS Hanif Ullah Koroona |
| 2    | Fazilat Bi Bi FA/PST Vill: Bangali, Teh: Puran, Shangla   | Ahmad Ullah    | Shangla  | 40.56 | GGPS Uch Khwar           |

Friday, April 09, 2010

1 of 5

EDO E&SE Nowshera

(11)  
 (c) Disabled Quota (2%)

| S.No | Name / Qualification / Address                 | Father's Name     | Union Council   | Score | Name of School          |
|------|--|-------------------|-----------------|-------|-------------------------|
| 1    | Madhina Bi Bi BA/PST, Dehri Kati Khel Nowshera | Aslam Khan        | Dehri Kati Khel | 57.21 | GGPS Shah Nawaz Koroona |
| 2    | Hifsa Beenish BA/PST, Dag Ismail Khel          | Gul Muhammad Shah | Dag Ismail Khel | 51.91 | GGPS No.2 Spin Khak     |

PST (Female) Minority Quota (0.5%)

| S.No | Name / Qualification / Address             | Father's Name | Union Council   | Score | Name of School |
|------|--|---------------|-----------------|-------|----------------|
| 1    | Maitha Wilson FA/PST ASC Colony NSR Cantt. | George Maseeh | Nowshera-Cantt. | 39.72 | GGPS Kana Khel |

PST (Female) Union Council Wise (75%)

| S.No | Name / Qualification / Address                             | Father's Name        | Union Council   | Score | Name of School                |
|------|--|----------------------|-----------------|-------|-------------------------------|
| 1    | Mihnaz BA/PST, Issori Payan Adamzai                        | Zerdil               | Adam Zai        | 56.53 | GGPS Mali Khel Bala           |
| 2    | Raima FA/PST, Issori Payan Adamzai                         | Muhammad Shuaib      | Adam Zai        | 54.15 | GGPS Mali Khel Payan          |
| 3    | Gul Naz BA/PST, Adamzai                                    | Abdul Hanan          | Adam Zai        | 53.64 | GGPS Mali Khel Payan          |
| 4    | Shahnaz Wazir FA/PST, Masam Khel Arjanzai                  | Wazir Khan           | Adam Zai        | 50.48 | GGPS Masam Khel               |
| 5    | Bibi Zainab BA/PST, Ali Shah Akbar Pura                    | Misal Khan           | Akber Pura      | 56.58 | GGPS Nala                     |
| 6    | Sidra Altaf FA/PST, Balu                                   | Altaf Hussain        | Balu            | 54.54 | GGPS Garhi Pegham Shah        |
| 7    | Rozi Gul BA/PST, Dag Behsud                                | Saad Ullah Jan Barq  | Dag Behsood     | 54.58 | GGPS Awaf Khan Koroona        |
| 8    | Noreen Akhtar BA/PST, Dag Behsud                           | Musharaf Shah        | Dag Behsood     | 53.24 | GGPS Mera Wazir Garhi         |
| 9    | Tabinda Aman BA/PST, Dagai                                 | Aman Ullah           | Dagai           | 57.12 | GGPS No 2 Dagai Qadeem        |
| 10   | Ambreen Zarba BA/PST, Dag Ismail Khel                      | Majnoon Ali          | Dag Ismail Khel | 52.81 | GGPS Chappri                  |
| 11   | Saima Bi Bi MA/PST, Gandehri                               | Ansar Ullah          | Gandehri        | 54.33 | GGPS Shpano Killi             |
| 12   | Hamida BA/PST, Behram Killi, Gandehri                      | Abdul Ghafar Khan    | Gandehri        | 53.65 | GGPS Khotab Killi             |
| 13   | Shabana Bi Bi BA/PST, LocoMolo Factory (Risalpur) Gandehri | Inayat Ullah         | Gandehri        | 52.59 | GGPS Shah Nawaz Koroona       |
| 14   | Arjum Begum BA/PST, Spin Kani Gandehri                     | Aman Ullah Khan      | Gandehri        | 50.26 | GGPS Spin Kani Mera           |
| 15   | Naima FA/PST, Afrido Killi Gandehri                        | Alam Gul             | Gandehri        | 49.68 | GGPS Zando Banda Chel         |
| 16   | Jasmin BA/PST, Gandehri                                    | Muhammad Usman       | Gandehri        | 49.61 | GGPS Banda Chel               |
| 17   | Zaib Un Nisa BA/PST, Inzari                                | Mehboob Khan         | Inzari          | 57.27 | GGPS Gandab                   |
| 18   | Nighat Ara BA/PST, Inzari                                  | Subaidar Ghuncha Gul | Inzari          | 56.83 | GGPS Toha                     |
| 19   | Ruqia Begum BA/PST, Inzari                                 | Subaidar Ghuncha Gul | Inzari          | 53.97 | GGPS Gharib Pura              |
| 20   | Shakita Naz BA/PST, Jallozai                               | Hussain Muhammad     | Jallo Zai       | 57.21 | GGPS Shah Berra               |
| 21   | Tahira Naz BA/PST, Jallozai                                | Tilawal Khan Khattak | Jallo Zai       | 50.45 | GGPS Umar Khan Killi          |
| 22   | Safia Begum BA/PST, Shagai Kahi                            | Shaista Din          | Kahi            | 54.96 | GGPS Shagai                   |
| 23   | Ulfat BA/PST, Shagai Kahi                                  | Khiyal Madin         | Kahi            | 52.64 | GGPS Tar Khel Payan           |
| 24   | Iram BA/PST, Amir Killi Kahi                               | Mumtaz Khan          | Kahi            | 52.11 | GGPS Tar Khel Payan           |
| 25   | Anila Gul BA/PST, Shewangi Kahi                            | Wahid Gul            | Kahi            | 51.07 | GGPS Shewangi                 |
| 26   | Shamra Bi Bi BA/PST, Khawrai Khair Abad                    | Rahim Khan           | Khair Abad      | 55.16 | GGPS Pitawo Payan             |
| 27   | Roobi Gul BA/PST, Moh: Mandori, Keshgi Bala                | Mumriaz Khan         | Keshgi Bala     | 56.94 | GGPS Ibad Gul Koroona         |
| 28   | Amna Begum BA/PST, Doran Abad Keshgi Bala                  | Muhammad Saqad       | Keshgi Bala     | 56.71 | GGPS Mubarak Shah Koroona     |
| 29   | Bi Bi Zainab BA/PST, Gul Abad Keshgi Bala                  | Khush Khuram         | Keshgi Bala     | 56.08 | GGPS Nawab Sner Koroona       |
| 30   | Rohia Fand BA/PST, Shewgai Koroona Keshgi Bala             | Fand Ullah           | Keshgi Bala     | 55.82 | GGPS Wali Jan Koroona         |
| 31   | Gul Zia MA/PST, Meta Khel Keshgi Bala                      | Abdul Ghayas         | Keshgi Bala     | 55.82 | GGPS Gundai Koroona           |
| 32   | Raheela Tabassum BA/PST, Meta Khel Keshgi Bala             | Sardar Ali           | Keshgi Bala     | 54.88 | GGPS Khalil Ur Rahman Koroona |
| 33   | Sadia BA/PST, Moh: Peran, Keshgi Payan                     | Shaukat Ali Khan     | Keshgi Payan    | 56.13 | GGPS Azeem Abad               |
| 34   | Haira Islam FA/PST, Moh: Janda Khel, Keshgi Payan          | Muhammad Islam       | Keshgi Payan    | 54.39 | GGPS Saadat Abad              |
| 35   | Kaisoom BA/PST, Janda Khel, Keshgi Payan                   | Sangin Khan          | Keshgi Payan    | 53.59 | GGPS Gudam Koroona            |

(12)

|    |   |                          |                      |   |
|----|---|--------------------------|----------------------|---|
|    | Lajbar Khan   | Kheslgi Payan            | 53.08                | GGPS Sikandar Abad  |
| 38 | Zobia Basri BA/PST, Khan Sher Garhi                   | Abdus Sattar             | Khudrizai/Khan sherG | 54.21 GGPS Khudrizai  |
|    | Rohila Sadeeq BA/PST, Khudrizai, Pabbi                | Khan Sadeeq              | Khudrizai/Khan sherG | 52.99 GGPS Khudrizai  |
| 39 | Saima Nawaz BA/PST, Kurvi                             | Abdul Thawab             | Kurvi                | 57.26 GGPS Banda Mula Khan  |
| 40 | Nuzhat Begum FA/PST, Hisartang Mandori                | Muhammad Saeed           | Mandori              | 54.58 GGPS Char Pani  |
| 41 | Hina Ashiq BA/PST, Mandori                            | Ashiq Khan               | Mandori              | 51.73 GGPS Aman Pura  |
| 42 | Shah Haram FA/PST, Kana Khel, Manki                   | Khan Sher                | Manki Sharif         | 49.76 GGPS No 2 Kana Khel   |
| 43 | Salma Begum FA/PST, Tangi Khattak Manki Sharif        | Miftahulhaq              | Manki Sharif         | 48.79 GGPS Awan Tangi Khattak   |
| 44 | Shakira FA/PST, Malik Abad Manki                      | Wazir Gul                | Manki Sharif         | 38.97 GGPS Asha Khel  |
| 45 | Nizakat Naik FA/PST, Spin Kani Kalan Pahan Katti Khel | Naik zaman Khattak       | Manki Sharif         | 45.06 GGPS Meraji Payan (Adjacent to U/C Pahari Katti Khel on temporary basis & non-transferable as per policy) |
| 46 | Asima Nawaz FA/PST, Marhati Banda Misri Banda         | Muhammad Nawaz           | Misri Banda          | 44.65 GGPS Maneri   |
| 47 | Rani Chaman Gul FA/PST, Hasan Khel Misri Banda        | Israr Ali Khan           | Misri Banda          | 38.88 GGPS Kass Koroona   |
| 48 | Kalsoom Begum SSC/PST, Marhati Banda, Misri Banda     | Zar Sad Khan             | Misri Banda          | 31.41 GGPS Sher Khan Koroona  |
| 49 | Aisha Bashir BA/PST, Akora Khattak                    | Bashir Ahmad Mazdoor     | Misri Banda          | 57.30 GGPS Islamabad (Adjacent to U/C Akora Khattak on temporary basis & non-transferable as per policy)        |
| 50 | Saiqa Gul MA/PST, Akora Khattak                       | Shir Afzal Khan          | Misri Banda          | 57.19 GGPS Zinda Patti (Adjacent to U/C Akora Khattak on temporary basis & non-transferable as per policy)      |
| 51 | Farhanda Naz MA/PST, Akora Khattak                    | Abdul Qadeem             | Misri Banda          | 56.14 GGPS Zinda Patti (Adjacent to U/C Akora Khattak on temporary basis & non-transferable as per policy)      |
| 52 | Hajera Jamil BA/PST, Garhi Momin, Mohib Banda         | Abdul Jamil              | Mohib Banda          | 56.20 GGPS No.3 Mohib Banda   |
| 53 | Gul Sanga BA/PST, Mohib Banda                         | Hazrat Ali               | Mohib Banda          | 55.87 GGPS No.3 Mohib Banda   |
| 54 | Gulnaz BA/PST, Mian Essa Mughalki                     | Muhammad Yaqoob          | Mughulkai            | 50.24 GGPS Uch Khwar  |
| 55 | Samina FA/PST, Usman Abad, Mughalki                   | Zari da Khan             | Mughulkai            | 46.44 GGPS Usman Abad   |
| 56 | Tanzeel Shams FA/PST, Mughalki                        | Shamsul Haq              | Mughulkai            | 45.04 GGPS Meshak   |
| 57 | Nasim FA/PST, Mughalki                                | Gul Zareen               | Mughulkai            | 42.50 GGPS Nandrak  |
| 58 | Waheeda Ismail BA/PST, Garu Nizampur                  | Dost Ismail              | Nizam Pur            | 50.62 GGPS Garu   |
| 59 | Sahera Bi Bi FA/PST, Namal Bala Nizampur              | Samar Gul                | Nizam Pur            | 49.90 GGPS Mir Kalan  |
| 60 | Sajida Mumtaz FA/PST, Nizampur                        | Mumtaz Khan              | Nizam Pur            | 49.35 GGPS Garu   |
| 61 | Zahida FA/PST, Banda Karim Nizampur                   | Said Wali Khan           | Nizam Pur            | 48.47 GGPS Maroba   |
| 62 | Fozia Begum BA/PST, Tekadaran Pabbi                   | Zarbaz Khan              | Pabbi                | 54.79 GGPS No.2 Pabbi   |
| 63 | Fadia Irshad BA/PST, Tarkanam Pabbi                   | Irshad Muhammad          | Pabbi                | 54.67 GGPS No 2 Pabbi   |
| 64 | Shabana Gul BA/PST, Sadu Khel, Pahari Katti Khel      | Khana Gul                | Pahari Katti Khel    | 53.84 GGPS No 1 Spin Kani Kalan   |
| 65 | Maryam Misal Khan FA/PST, Shiekh, Pahari Katti Khel   | Misal Khan               | Pahari Katti Khel    | 48.43 GGPS No 2 Spin Kani Kalan   |
| 66 | Shaheen Akhtar BA/PST, Pahari Katti Khel              | Lal Muhammad Khan        | Pahari Katti Khel    | 48.43 GGPS No.1 Pahari Kati Khel  |
| 67 | Afsal Jehan BA/PST, Palosi Payan, Pahari Katti Khel   | Wazeef Ullah             | Pahari Katti Khel    | 48.29 GGPS No.2 Pahari Kati Khel  |
| 68 | Robina Bahadar BA/PST, Rashakai                       | Bahadar Khan             | Rashakai             | 57.02 GGCMS Hasan Abad  |
| 69 | Nosheen Gul BA/PST, Bakhtai Shahkot                   | Samin Gul                | Shah Kot             | 57.19 GGPS Hameed Abad  |
| 70 | Ruqia BA/PST, Kotli Kalan Shahkot                     | Khurshid Ali             | Shah Kot             | 52.57 GGPS Jabba Khushk   |
| 71 | Roshna FA/PST, Bakhtai Shahkot                        | Zoran Gul                | Shah Kot             | 47.63 GGPS Jabba Tar  |
| 72 | Robina Yasmin FA/PST, Tor Khel Shahkot Payan          | Solamal Gul              | Shah Kot             | 47.16 GGPS Wahid Abad   |
| 73 | Sahera FA/PST, Noor Abad Shah Kot                     | Nasoor Ud Din Shah Jahan | Shah Kot             | 44.16 GGPS Noor Abad Shah Kot   |
| 74 | Nalces FA/PST, Zao Banda Shah Kot                     | Imandar Khan Khattak     | Shah Kot             | 43.39 GGPS Tapwan   |
| 75 | Mihnaz Khattak FA/PST, ShahKot Payan                  | Sheraz Gul               | Shah Kot             | 42.30 GGPS Haji Abad Shah Kot   |
| 76 | Shamim Akhtar FA/PST, Shahkot Payan                   | Sheraz Gul               | Shah Kot             | 41.39 GGPS Shah Kot Payan   |

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|    | Begum BA/PST, Shaidu                           | Muhammad Amin         | Shaidu     | 56.31 | GGPS Khattak Koroona  |
|    | Juhal Ul Ain BA/PST, Shaidu                    | Ubaid Ur Rahman       | Shaidu     | 54.50 | GGPS Khattak Koroona  |
| 80 | Rukhsana BA/PST, Spin Khak                     | Sadbar Khan           | Spin Khak  | 47.32 | GGPS Gul Din Koroona  |
|    | Basirat Naz FA/PST, Spin Khak                  | Lai Muhammad          | Spin Khak  | 44.82 | GGPS Gul Din Koroona  |
| 81 | Rozina FA/PST, Spin Khak                       | Muhammad Noor Khattak | Spin Khak  | 44.18 | GGPS Mera Spin Khak   |
| 82 | Shahida Sawab Din FA/PST, Spin Khak            | Sawab Din             | Spin Khak  | 43.39 | GGPS Jaroba   |
| 83 | Nazia Jamil FA/PST, Zara Miana                 | Muhammad Jamil        | Zara Miana | 41.77 | GGPS Turlandi   |
| 84 | Shabana BA/PST, Dehri Kati Khel NSR            | Roshan Zamir          | Zara Miana | 56.22 | GGPS Mera Zara Mena Hukam Khan Koroona (Adjacent to U/C Dehri Katti Khal on temporary basis & non-transferable as per policy) |
| 85 | Mehnaz Begum BA/PST, Spin Kani Khurd ZKK Sahib | Muhammad Iqbal        | ZKK Sahib  | 56.32 | GGPS Tarkhel Bala   |
| 86 | Kanwal Hilal BA/PST, Mir Kalani ZKK            | Syed Abd Ullah Shah   | ZKK Sahib  | 56.13 | GGPS Sarangi Bagh   |
| 87 | Rina Bi Bi BA/PST, ZKK Sahib                   | Nasir ud Din          | ZKK Sahib  | 55.74 | GGPS Baitul Garib   |
| 88 | Sumayya Saeed MA/PST, Shahab Khel ZKK Sahib    | Saeed Ud Din          | ZKK Sahib  | 55.69 | GGPS Durran   |
| 89 | Naveeda Akhtar BA/PST, Shahi Bagh ZKK Sahib    | Sikandar Khan         | ZKK Sahib  | 54.13 | GGPS Gul Dehri  |
| 90 | Anifa Naz BA/PST, Risal Pur Cantt.             | Muhammad Qadeer       | Pir Sabaq  | 54.77 | GGPS No 2 Pir Sabaq (Adjacent to U/C Risal Pur Cantt. on temporary basis & non-transferable as per policy)                    |
| 91 | Naheed BA/PST, Risal Pur Cantt.                | Furqan Ahmad Abbasi   | Pir Sabaq  | 51.01 | GGPS Mian Gul Koroona (Adjacent to U/C Risal Pur Cantt. on temporary basis & non-transferable as per policy)                  |

#### TERMS & CONDITIONS

1. The appointee will get initial scale including usual allowances as admissible under the rules. They are entitled for annual increment after completion of one year service; however they are not eligible for pension and gratuity as per current policy of the Govt. of NWFP.
2. The Deputy District Officer E&S Education (M/F) concerned must obtain surety bond as well as agreement bond executed by each candidate to obey policy of the Govt. of NWFP Act-2005 and will have no right to challenge the policy in any court of law.
3. Their Services will be considered as per current rules and regulation of the NWFP.
4. Their services are liable to be terminated on one month's prior notice from either side. In case of resignation without prior notice one month pay and allowances, if any shall be forfeited in favors of Govt. through treasury challan.
5. Their Services will be on probation for two years and they will not be transferred to other station before completion of probation period.
6. Contribution of CIP Fund will be made as per rules and regulations of Govt. of NWFP.
7. The appointees should re-verify their names from the undersigned and join their posts within 15 days of the issuance of this order positively otherwise the appointment shall stand as cancelled.
8. Their services can be terminated at any time, in case their performance is found unsatisfactory and they will be removed from service under the rules framed from time to time.
9. They are directed to furnished copies of all sort of certificates/degrees etc. along with their original receipts and photo copies of all testimonial pertaining to the verification fee of concerned examination bodies (Board/University) to the Executive District Officer E&SE Nowshera. If any certificate/degree etc. of any candidate found fake in verification process, he/she will be removed from service under the existing rules.
10. The appointing authority shall arrange verification of all the certificates and degrees (academic and professional) etc. of the appointee and will issue clearance certificate of each appointee to the DAO for the release of his/her pay.
11. The Pay Source-1 should not be submitted to DAO Nowshera prior verification of the certificates/degrees from the concerned institutions.



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- 1. The ADOs concerned should personally check their original certificates, degrees, domiciles and CMC before handing over charge.
- 2. Overage candidates should not be handed over charge, appointed in Open Merit, Deceased children, Disabled and Earthquake quotas unless the age relaxation awarded to them. The age limit in respect of PST is 18-35.
- 14. The appointment of the deceased quota are made subject to the provision of the certificate issued by the concerned authority i.e. death certificate during service, pension book and affidavit reflecting non-availing of benefits in the appointment.
- 15. The disable candidates should produce fresh certificate from the Standing Medical Board (SMB) to the effect that their disability will not obstruct in their job.
- 16. Health and age certificate should be provided from the Medical Superintendent before taking over charge.
- 17. Charge report should be submitted to all concerned.
- 18. No TA/DA etc. shall be allowed to the appointees for joining their duties.

(Haji Hasanat Gul Kkattak)  
 Executive District Officer  
 Elementary & Secondary Education  
 Nowshera

Endst. No. 519-660/EDO E&SE NSR/PST(F) /Establishment branch Dated 09/04/2010

Copy forwarded for information and necessary action to the:-

- 1. PS to Minister for E&S Education NWFP Peshawar.
- 2. PS to Secretary E&S Education NWFP Peshawar.
- 3. Director, E&S Education NWFP Peshawar.
- 4. Section Officer (PE) Govt. of NWFP. E&S Education Peshawar.
- 5. District Coordination Officer Nowshera.
- 6. Senior District Accounts Officer Nowshera.
- 7. Human Resource Development Officer (DCO Office Nowshera.
- 8. District Officer/Deputy District Officer (M/F) E&S Education Nowshera.
- 9. Assistant District Officer Concerned E&S Education Nowshera
- 10. Head Teacher concerned.
- 11. Candidates Concerned.

*H. Hasanat Gul Kkattak*  
 Executive District Officer  
 Elementary & Secondary Education  
 Nowshera

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(تقریری / تبادلہ / بیانی)

بجوالہ (تقریری / تبادلہ / بیانی) کلمہ نامہ / پبلشرز / ایڈیٹرز / ڈسٹریبیوٹرز / ایکسپنڈیٹرز / پریس / نوٹس /

نمبر: 519-660 مورخہ: 13-02-2015 اسپتال / کالج / مدرسہ / کالج / مدرسہ / کالج / مدرسہ

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تاریخ و وقت: 7:30 13-02-2015

تاریخ و وقت: 7:30 13-02-2015

ڈاکٹر / بیگم

HEAD MISTRESS  
G. G. P. S. No. 1  
PABBI (Nowshera)

ڈاکٹر / بیگم

ڈاکٹر / بیگم

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روزنامه‌های تهران

| ردیف | روزنامه | تاریخ | قیمت | ملاحظات |
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HEAD P. P. ...  
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مجلس التعليم العالي  
البحرين

رقم الملف

اسم الطالب

رقم الامتحان

اسم المادة

الدرجة

ملاحظات

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| 26  | AS 159     | 23           | AS 23      | 23     |         |
| 27  | AS 159     | 23           | AS 23      | 23     |         |
| 28  | AS 159     | 23           | AS 23      | 23     |         |
| 29  | AS 159     | 23           | AS 23      | 23     |         |
| 30  | AS 159     | 23           | AS 23      | 23     |         |
| 31  | AS 159     | 23           | AS 23      | 23     |         |
| 32  | AS 159     | 23           | AS 23      | 23     |         |
| 33  | AS 159     | 23           | AS 23      | 23     |         |
| 34  | AS 159     | 23           | AS 23      | 23     |         |
| 35  | AS 159     | 23           | AS 23      | 23     |         |
| 36  | AS 159     | 23           | AS 23      | 23     |         |
| 37  | AS 159     | 23           | AS 23      | 23     |         |
| 38  | AS 159     | 23           | AS 23      | 23     |         |
| 39  | AS 159     | 23           | AS 23      | 23     |         |
| 40  | AS 159     | 23           | AS 23      | 23     |         |
| 41  | AS 159     | 23           | AS 23      | 23     |         |
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| 45  | AS 159     | 23           | AS 23      | 23     |         |
| 46  | AS 159     | 23           | AS 23      | 23     |         |
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| 55  | AS 159     | 23           | AS 23      | 23     |         |
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| 87  | AS 159     | 23           | AS 23      | 23     |         |
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| 89  | AS 159     | 23           | AS 23      | 23     |         |
| 90  | AS 159     | 23           | AS 23      | 23     |         |
| 91  | AS 159     | 23           | AS 23      | 23     |         |
| 92  | AS 159     | 23           | AS 23      | 23     |         |
| 93  | AS 159     | 23           | AS 23      | 23     |         |
| 94  | AS 159     | 23           | AS 23      | 23     |         |
| 95  | AS 159     | 23           | AS 23      | 23     |         |
| 96  | AS 159     | 23           | AS 23      | 23     |         |
| 97  | AS 159     | 23           | AS 23      | 23     |         |
| 98  | AS 159     | 23           | AS 23      | 23     |         |
| 99  | AS 159     | 23           | AS 23      | 23     |         |
| 100 | AS 159     | 23           | AS 23      | 23     |         |

G. G. & S. No. 1  
p. 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) ڈسٹرکٹ نوشہرہ

جناب عالیہ!

گزارش کی جاتی ہے کہ سائلہ کی تقرری بطور پی ایس ٹی ٹیچر برطانیہ  
آڈر نمبر 519-660 تاریخ 09-04-2010 کو ہوئی تھی۔ سائلہ اپنی ڈیوٹی انتہائی ایمانداری سے  
رہی تھی اور ڈیوٹی کر دوران کسی کو بھی مجھ سے کوئی شکایت نہیں تھی میں باقاعدگی سے سکول جاتی تھی لیکن  
میری تنخواہ شروع نہیں کر رہے تھے کافی دفعہ اپیل کر کے آفس والوں کو یاد کرواتی تھی لیکن کوئی مثبت پیش  
رفت نہ ہوتی اور آخر میں سیاسی مداخلت پر مجھے زبانی کہنے پر فارغ کر دیا کہ آپ کی ضرورت نہیں ہے  
آپ ڈیوٹی پر مت آیا کریا اور ہیڈ ٹیچر کو کہہ دیا کہ اس کو سکول کے ٹیچر کی خاضری رجسٹر میں خاضری نہ لگو  
جائے۔ جناب عالیہ کافی درخواستیں، اپیلیں کی لیکن کوئی جواب نہیں ملا آپ سے گزارش کی جاتی ہے کہ  
میرے درخواست پر غور کیا جائے اور مجھے اپنی ڈیوٹی پر بحال کیا جائے۔ بڑی مہربانی ہوگی۔

العرض

آپ کے لیے دعا گوآمینہ دختر فرہاد خان

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) نوشہرہ

جناب عالیہ!

جناب عالیہ آپ کی توجہ میں اپنے ایک اہم اور درینہ حق کی طرف دلاتا چاہتی ہوں۔ جناب عالیہ میں نے متعدد بار آپ کے زیر سایہ مختلف تاریخ میں آپ کو اپیل کی تھی اور شنوائی نہ ہو۔ کی صورت میں Next High Authority کو کئی بار درخواست دے چکی ہوں اور پھر آخر میں ان ڈائری نمبر 655 تاریخ 25-01-2018 کو اپیل جمع کروادی جس پر ان کو ترس آیا اور میری اپیل میں انکو آری کے لیے ڈی ای او نوشہرہ کو بھجوا دی جس میں آپ کے آفس یعنی ڈی ای او آفس کے دائری نمبر 1464 تاریخ 12-03-2018 کو موصول ہوئے اور وصول کر دی گئی لیکن تا حال اس پر کوئی کارروائی نہیں ہوئی متعدد بار آپ کی آفس کے آفسران بالا کے چکر لگا لگا کر تھک چکی ہوں 2010 سے لے کر آج تک میرے ساتھ نا انصافی کا سلسلہ جاری ہیں اس دوران کئی مرتبہ نوکری کی آسامیاں آئی جس کے لیے میں اہل تھی تعلیمی معیار بھی پوری تھی اور میں صرف اس وجہ سے رہ جاتی تھی اپلائی کرنے سے کہ میں آپ لوگوں کی جواب کی منتظر تھی میں ایک غریب عورت ہوں میرے علاوہ میرے کام کے پیچھے بھاگنے والا کوئی نہیں ہے اس لیے آپ صاحبان سے گزارش ہے کہ ڈائریکٹریٹ کی طرف سے آر کونولیسٹر بھجوائی گئی ہے اس پر انکو آری کر کے مجھے میرے پوسٹ پر بحال کیا جائے سینیارٹی سمیت میں زندگی بھر مشکوذاہر ممنوع رہوں گی۔

آپ کے لیے دعا گو

آپ کی ایس ٹی ٹیچر گورنمنٹ گریڈ پرائمری سکول نمبر 1 پی





CF<sup>u</sup> (22)

9/1/22

SECRET

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Date 27-6-22

رواں اس میں اور...  
نیو جان فارما سے بنانے باوجود اس میں

بخدمت بناب ڈائریکٹر صاحب ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا پشاور  
مقام ایف اے کے لئے

میں  
04-2010) میں سے ہر دورہ کے لئے طلبہ کو اپنی رہائش گاہ پر اپنی  
بیمہ بھجور کے ذریعے اپنی رہائش گاہ پر ہر دورہ کے لئے طلبہ کو اپنی رہائش گاہ پر اپنی  
نوٹرز سے درخواست کرنے کی ہے۔ اس کے ساتھ ساتھ طلبہ کو اپنی رہائش گاہ پر اپنی  
میرٹس سے ہر دورہ کے لئے طلبہ کو اپنی رہائش گاہ پر اپنی رہائش گاہ پر اپنی  
مقامی کونسل کے ذریعے ہر دورہ کے لئے طلبہ کو اپنی رہائش گاہ پر اپنی رہائش گاہ پر اپنی

نوٹ: اتھارٹی رپورٹ اور دیگر کاغذات منسلک ہے۔

تین نوٹرز ہوں گی۔

آپ کے لیے وہ کوآرڈینیٹنگ ایس ٹی جی پی ایس نمبر 1 ہے۔

کاپی برائے اطلاع:

- 1۔ ڈسٹرکٹ ایجوکیشن آفیسر (ٹی ایمیل) ڈسٹرکٹ نوشہرہ
- 2۔ ایس ڈی ای او (ٹی ایمیل) تحصیل جی ڈسٹرکٹ نوشہرہ

Daisy no 351



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OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(FEMALE) NOWSHERA

(Office Phone#0923-9220105, Fax#0923-9220105)

INQUIRY:

Consequent upon application submitted by Mst. Amina D/O Farhad Khan Ex-PST GGPS No. 01 Pabbi District Nowshera Regarding her Removal from Service .

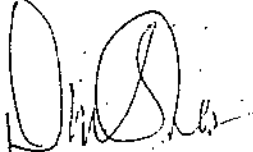
Therefore the Undersigned is pleased to nominate Mst. Sajida Head Mistress GGHS Dagi Qadeem Nowshera to probe into the matter and detailed report (along with clear cut recommendations) be submitted to the undersigned within 07 Days for further necessary action.

(DURE SHAWAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE)NOWSHERA

Endstt: No. 1637-68 /PRY Estab/ Inquiry: File /DEO (F) NSR Dated 18/07 /2022.

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

1. Secretary Elementary & Secondary Education Department Peshawar.
2. Director Elementary & Secondary Education Department Peshawar.
3. Deputy Commissioner Nowshera.
4. Head Mistress GGHS Dagi Qadeem Nowshera.
5. Sub Divisional Education Officer (F) Pabbi.
6. Superintendent Local Office.
7. EMIS Local Office.
8. ASDEO (F) Circle Concerned.
9. Office Copy.

  
DISTRICT EDUCATION OFFICER  
(FEMALE)NOWSHERA

1744 (25)

CONFIDENTIAL

OFFICE OF THE HEAD MISTRESS GOVT. GIRLS HIGH SCHOOL DAGI QADEEM  
NOSHERA

INQUIRY REPORT REGARDING Mst. AMINA D/O FARHAD EX- PST GGPS No.1  
PABBI NOWSHERA.

INTRODUCTION

Mst. Amina D/o Farhad Resident of village Pabbi Nowshera submitted an application to Director Elementary and Secondary Education Khyber Pakhtoon Khwa Peshawar for reinstatement against PST Post. The same application was sent by the honorable Director Elementary and Secondary Education Khyber Pakhtoon Khwa Peshawar for detail inquiry and proper action to DEO (Female) Elementary and Secondary Education Nowshera.

The District Education Officer (Female) Elementary and Secondary Education Nowshera nominated the undersigned for detail inquiry and clear cut recommendations vide office order No. 1637-45/Pry Estab/ inquiry File/DEO (F) NSR Dated 18/07/2022.

HISTORY OF THE CASE

Mst. Amina D/o Farhad Resident of village Pabbi Nowshera submitted an application to DEO (Female) Elementary and Secondary Education Nowshera that she was appointed as PST in Govt Girls Primary School No.1 Pabbi vide Executive District Officer Elementary and Secondary Education Nowshera No.519-660/EDO E&SE NSR/PST (F) Establishment Branch dated 09/04/2010. I was performing my duty regularly for about 09 months. I was verbally directed that you have been removed from service and you are not allowed to come to school more. I filed Several Appeals but No reply given. I submitted last appeal to Director Elementary and Secondary Education Khyber Pakhtoon Khwa Peshawar which has been sent to your office vide Dairy No. 665 dated 25.01.2018.

She submitted an Appeal to District Education Officer (Female) Nowshera with request to decide her appeal on merit at the earliest.

Sajida Begum Head Mistress GGHS Dagi Qadeem

## PROCEEDINGS

(261)

Mst Amina Daughter of Farhad Khan Resident of village Pabbi in her appeal requested that:-

1. She is a Qualified PST and Master Degree holder (MA Urdu).
2. She was appointed as PST on open merit basis vide Executive District Officer Elementary and Secondary Education Nowshera No.519-660/EDO E&SE NSR/PST (F) Establishment Branch dated 09/04/2010 at S.No.2 and posted at Govt Girls Primary School No.1 Pabbi.
3. She performed her duty till September 2010.
4. On verbal direction of high ups she was removed from service without any reason and without any written order.

The undersigned called Mst. Amina D/O Farhad Khan to my school and gave a Questionnaire to her. Her detail reply is as under;

1. My Name is Amina D/O Farhad Khan.
2. My Qualification is MA Urdu/ Primary School Teaching Certificate.
3. I was appointed as PST in GGPS No.1 Pabbi on merit basis vide Executive District Officer Elementary and Secondary Education Nowshera No.519-660/EDO E&SE NSR/PST (F) Establishment Branch dated 09/04/2010.
4. Yes I got my Medical Certificate from District Head Quarter Hospital Nowshera and submitted to SDEO (Female) Nowshera.
5. I performed my duty at GGPS No.1 till September 2010
6. On the verbal direction of ASDEO circle Pabbi the Head Mistress told me that you have been terminated and not to come school more.
7. I was not given any written order neither by the Head Mistress nor by the ADEO (F) Circle Pabbi.
8. Yes. I visited so many time the Office of EDO E&SE Nowshera. I was told by the officials that our record has been destroyed in flood and we have No record.
9. No I have not been paid any pay for my duty period.

Sajida Begum Head Mistress GGHS Dagi Qadeem

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The under signed visited Govt Girls Primary School No.1 Pabbi and checked the record of school. Although attendance register shows that Mst. Amina PST have performed her duty till September 2010 but the Head Mistress told that she did not know about Mst. Amina that why she was stopped from duty as she was not the Head Mistress that time. On inquiry it was informed that Miss Dilshad Begum was the Head Mistress in the said school that time who is presently working as ASDEO (Female) Pabbi, therefore a Questionnaire prepared for the Head Mistress was given to her in Circle Office Pabbi.

**Miss Dilshad Begum ASDEO (F) Pabbi stated that;-**

1. I was working as a Teacher in GGPS No.1 Pabbi from 2004 to 2006.
2. I remained Head Mistress in GGPS No.1 Pabbi from 2006 to 2013.
3. On the basis of Appointment Order and Medical Fitness Certificate I handed over the charge of PST Post to Mst. Amina D/O Farhad Khan.
4. She was very dutiful and hardworking teacher. I always found her busy with her students.
5. On the verbal direction of ADEO Circle Pabbi, Mst. Amina PST was relieved from duty. I got no written orders from my offices.
6. Mst. Amina is the permanent resident of this Union Council.

#### FINDINGS

- Mst. Amina D/O Farhad Khan was appointed as PST in GGPS No.1 Pabbi on merit basis vide Executive District Officer Elementary and Secondary Education Nowshera No.519-660/EDO E&SE NSR/PST (F) Establishment Branch dated 09/04/2010. (Order duly verified by the ASDEO (F) Circle Pabbi attached ANNEX----A).
- Mst. Amina EX-PST joined her service and performed duty to the entire satisfaction of her superiors till September 2010 without any break. (Copy of attendance register is attached as ANNEX-----B)
- She is a permanent Domiciled of Village and Union council Pabbi District Nowshera. (Verification of secretary union council Pabbi is attached as ANNEX---C)
- She is a qualified teacher and MA Urdu/ PST from Allama Iqbal Open University. (Copy of MA Urdu and PST certificate is attached as ANNEX----D)
- Reason for removal from service is not available anywhere.


Sajida Begum Head Mistress GGHS Dagi Qadeem

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- No procedure for removal of service has been adopted nor any record available anywhere in offices.
- In case of her reinstatement no body shall be affected.

**RECOMMENDATIONS**

- ❖ Mst. Amina D/O Farhad Khan may be reinstated in service as soon as possible, so that Justice to some extent be provided to her.
- ❖ The period she have not performed duty may be sanctioned as leave without pay.
- ❖ Before releasing her pay all Academic and Professional Documents may be verified from the concerned Boards/ Universities if not verified already.

  
**HEADMISTRESS  
G.G.H.S Dagi Qadeem  
Nowshera**

(SAJIDA BEGUM)

HEAD MISTRESS  
GOVT GIRLS HIGH SCHOOL  
DAGI QADEEM NOWSHERA  
(INQUIRY OFFICER)

Sajida Begum Head Mistress GGHS Dagi Qadeem

سوال نامہ سکول ہیڈ ماسٹریں

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- سوال نمبر 1- آپ کا نام بمعہ عہدہ سکول کا نام (مسابقہ ہیڈ ماسٹریں دلشاد بیگم جی جی جی پی این گلبرگ دیہی)
- سوال نمبر 2- آپ کب سے اس سکول میں ہیں۔ (2004 سے 2013 تک اس سکول میں تھی)
- سوال نمبر 3- آپ کب سے اس سکول میں بطور ہیڈ ماسٹریں ہے۔ (2006 تا 2013 بطور ہیڈ ماسٹریں)
- سوال نمبر 4- مس آئینہ سابقہ پی ایس ٹی ٹیچر کو آپ کس طرح جانتی ہے۔ (بطور PST ٹیچر سکول میں چارج لیا)
- سوال نمبر 5- آپ نے مس آئینہ سابقہ پی ایس ٹی ٹیچر کو چارج دیا تھا۔ (جی ہاں)
- سوال نمبر 6- آپ نے چارج کس بنیاد پر دیا تھا۔ (آؤٹر کی بنیاد پر)
- سوال نمبر 7- کیا آپ نے بھرتی آؤٹر کی معتلقہ آفس سے تصدیق کروائی تھی (جی ہاں)
- سوال نمبر 8- آپ نے بھرتی آؤٹر اور میڈیکل خود چیک کئے تھے۔ (جی ہاں)
- سوال نمبر 9- یہ باقاعدگی سے اپنی ذیوٹی پر حاضر ہوتی تھی اور باقاعدگی سے اپنی خاضری رجسٹر میں لگاتی تھی۔ (جی ہاں)
- سوال نمبر 10- ان کی پڑھائی کیسی تھی اور بچوں کے ساتھ روپ کیا تھا۔ (صحت کھنت کرتی تھی اور بچوں کے ساتھ اچھا)
- سوال نمبر 11- آپ نے ان کو خاضری لگانے سے کیوں روکا۔ (اے ڈی او سرکل دیہی (فیمل) کے کہنے پر)
- سوال نمبر 12- آپ نے کس کے کہنے پر سکول آنے سے روکا۔ (اے ڈی او سرکل دیہی (فیمل) کے کہنے پر)
- سوال نمبر 13- آپ کے پاس ان کو نوکری سے فارغ کرنے کی کوئی تحریری احکامات آئے تھے۔ (نہیں تھی)

HEADMISTRESS  
G.G.H.S Dagi Qadom  
Nowshera

مسابقہ ہیڈ ماسٹریں

دلشاد بیگم

جی جی جی پی این گلبرگ دیہی



سوال نمبر 1- آپ کا نام عمدہ سکول نام۔ مس مسلم خان

سوال نمبر 2- آپ مس آئینہ سابقہ پی ایس ٹی کو جانتی ہے۔ جی ہاں

نمبر 3- آپ ان کو کس طرح جانتی ہے۔ کہ اردو ٹیچر کی حیثیت سے

سوال نمبر 4- کیا یہ آپ کے ساتھ سکول میں ٹیچر تھی۔ جی ہاں

سوال نمبر 5- کیا یہ اسی یونین کونسل کی ہے۔ جس میں سکول ہے اور جس میں اس کی تقرری ہوئی تھی۔ جی ہاں

سوال نمبر 6- کیا یہ باقاعدہ سکول آتی تھی۔ جی ہاں

سوال نمبر 7- آپ کے اور ٹیچر کے ساتھ رویہ کیسی تھی۔ اچھا تھا

سوال نمبر 8- پڑھانے میں کیسی تھی۔

سوال نمبر 9- بچوں کے ساتھ سلوک کیسی تھی۔

سوال نمبر 10- ان کو سکول سے کیسے فارغ کی۔

بہت اچھی تھی  
بہت اچھی تھی  
بہت اچھی تھی

18/2022

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| قیمت<br>50 روپے               | 55798       |  |  |  |
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بعد ازاں جناب: محمد سعید طالپہ

|   |                              |
|---|------------------------------|
| منجانب: <u>السلیم</u>   | دعویٰ: <u>Service Appeal</u> |
|  | علت نمبر:                    |
|   | مورخہ:                       |
|   | جرم:                         |
|   | تھانہ:                       |

**باعت تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کا روائی متعلقہ  
 آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



مقام: پشاور  
 رقم: 55798  
 کے لیے منظور ہے۔  
 نوٹ: اس وکالت نامہ کی کوئی تاخیر قابل قبول نہیں۔  
 Accepted  
 Pleas