

20.01.2021

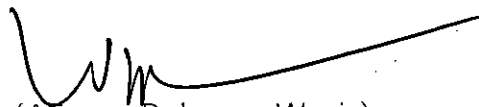
Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.

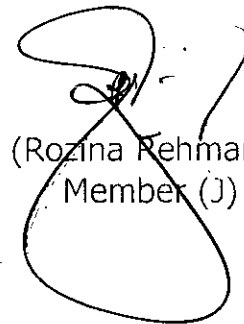
Vide detailed judgment of today of this Tribunal placed on file of connected service appeal No.1014/2019 tilted Mst. Ishrat Vs. Education Department, the impugned orders stand set aside and the appellant is reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellant be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

Announced.

20.01.2021



(Atiq-ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

09.12.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Salim Law Officer, Fahim Ullah Law Officer and Murtaza Superintendent for respondents present.

File to come up alongwith connected appeal No.1014/2019, on 12.01.2021 for before D.B.



(Atiq ur Rehman Wazir)
Member (E)



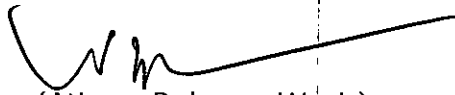
(Rozina Rehman)
Member (J)

12.01.2021


Appellant with counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer for respondents present.

File to come up alongwith connected appeal No.1014/2019 on 20.01.2021 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

12.08.2020

Due to summer vacations case to come up for the same on
~~15.08~~ 2020 before D.B.


Reader


15.10.2020

Mr. Khalid Khan Mohmand, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Hazrat Shah, Section Officer, are also present.

Learned counsel submitted that his senior has proceeded to Dar-ul-Qaza Mingora bench of the Hon'ble Peshawar High Court, Peshawar, and cannot attend the Tribunal today. Requested for adjournment. Adjourned to 17.11.2020 on which to come up for arguments before D.B.



(Atiq-ur-Rehman Wazir)
Member (Executive)



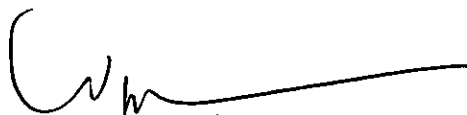
(Muhammad Jamal Khan)
Member (Judicial)

17.11.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Saleem Law Officer for respondents present.

To come up alongwith connected file No.1014/2019, on 09.12.2020 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.


Reader

23.06.2020

Counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Muhammad Irfan Assistant, representative of respondents No.1 & 2 present and submitted reply on behalf of the said respondents.

Muhsin Hassan Khan present and submitted authority letter on behalf of respondent No.3 with a request for another adjournment; adjourned but on cost of Rs.2000/-. To come up for written reply/comments of respondent No.3, on 22.07.2020 before S.B


Member

22.07.2020

Appellant himself is present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Mohsin, Litigation Officer on behalf of respondent No. 3 are also present.

Joint para-wise comments on behalf of respondents No. 1 & 2 have already been submitted while representative of respondent No. 3 submitted written reply today which is placed on record. Representative of respondent No. 3 also paid Rs. 2000/- as per previous order sheet dated 23.06.2020 which is handed over to appellant and receipt thereof also obtained from the appellant, which is placed on record. File to come up for arguments on 12.08.2020 before D.B. The appellant may submit rejoinder within a fortnight, if so advised.


(MUHAMMAD JAMAL KHAN)
MEMBER

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.

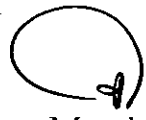

Reader

23.06.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith representatives M/S Irfan Ullah Assistant and Mohsin Hassan Khan for the respondents present.

Representatives of the respondents submitted written reply which is placed on record. To come up for rejoinder, if any, and arguments on 21.08.2020 before D.B.


Member

10.02.2020

Learned counsel for the appellant present. Written reply not submitted. M/S Irfan Ali Assistant (for respondents No.1 & 2) and Mehtab Gul Law Officer (for respondent No.3) present. Representatives of respondents requested for a short adjournment to furnish reply. Granted. To come up for written reply/comments on 24.02.2020 before S.B.


Member

24.02.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hayat Khan, AD and Mehtab Gul, Law Officer for the respondents present. Respondents still seek time to submit reply/comments. Last chance is granted. To come up for written reply/comments on 12.03.2020.


(Hussain Shah)
Member

12.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith M/S Hayat, Assistant Director on behalf of respondents No. 1 & 2 and Iftikhar Bangash on behalf of respondent No. 3 present. Written reply on behalf of respondents not submitted despite last chance. Both the representatives of the department seek further time to furnish written reply/comments. Last chance is extended to 31.03.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

19.12.2019

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of respondents seeks further time to furnish reply/comments. Adjourned to 08.01.2020 on which date the requisite reply/comments shall positively be submitted.

Chairman 

08.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Irfanullah, Assistant for respondents No. 1 & 2 present. Nemo for respondent No. 3.

Representative of respondents No. 1 & 2 seeks time. Fresh notice be issued to respondent No. 3. To come up for written reply/comments on 24.01.2020 before S.B.

Chairman 

24.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of the respondents seeks short adjournment for submission of reply/comments. Adjourned to 10.02.2020 on which date the requisite reply/comments shall positively be furnished.


Chairman 

06.09.2019

Counsel for the appellant present.

Contends that through notification dated 04.04.2019 the respondent No. 2/Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar "disowned" the appointment/adjustment notification of the appellant ostensibly on the ground that at the time of initial appointment the appellant had provided fake/bogus documents. Even the appointment order itself was not genuine. It was argued that while dispensing with the service of appellant the respondents did not resort to mandatory departmental proceedings and the appellant was not provided with any opportunity of putting forth his defence. The respondents did not care to issue any show cause notice nor a proper/regular enquiry was conducted before issuing of impugned notification.

In view of available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11.2019 before S.B.


Appellant Deposited
Security & Process Fee


Chairman

18.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Hamid Saleem Law Officer for the respondents present.

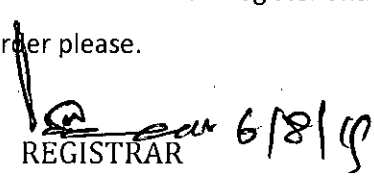

Representative of the respondents seeks time to furnish written reply/comments. Adjourned to 19.12.2019 on which date the requisite reply/comments shall positively be submitted.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1027/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/08/2019	<p>The appeal of Mst. Sarwat Jehan presented today by Mr. Amin-ur-Rehman Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 6/8/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/09/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

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

1027
Service Appeal No. ___/2019

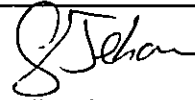
Mst. Sarwat JehanAppellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 othersRespondents

I N D E X

S.No.	Description of documents	Annex	Pages
1.	Service Appeal		1-4
2.	Application for Grant of Status Quo alongwith Affidavit		5-6
3.	Addresses of the parties		7
4.	CNIC	"A"	8
5.	CV	"B"	9
6.	Educational Testimonials	"C"	10-14
7.	Advertisement dated: 26.01.2009	"D"	15-19
8.	Appointment Notification dated: 30.01.2012 alongwith Medical Certificate dated: 23.12.2011	"E"	20-22
9.	Adjustment order dated: 16.02.2012 alongwith charge report dated: 22.02.2012	"F"	23-24
10.	Impugned Notification dated: 05.04.2019	"G"	25
11.	Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number	"H"	26-27
12.	Wakalatnama		28



Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

1

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

Service Appeal No. 1027/2019

Mst. Sarwat Jehan D/O Gul Rehman, Ex-SST (Gen),
R/o Village Ganjai, Tehsil Takhbhai, District Mardan

Khyber Pakhtunkhwa
Service Tribunal

Appellant

Diary No. 1140

....VERSUS....

Dated 06/08/2019

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt. Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:

NOTIFICATION ENDORSEMENT NO.5861-66, DATED: 05.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 30.01.2012 ALONGWITH ADJUSTMENT ORDER DATED: 16.02.2012, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

PRAYER-IN-APPEAL:

On Acceptance of Instant Appeal, the Impugned Notification dated 05.04.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, Hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Filed to-day
Registrar
6/8/19

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of District Mardan.
(Copy of CNIC, is attached as Annexure "A")
2. That appellant obtained Master degree, in the year 2005, from University of Malakand and having passed B.Ed & M.Ed Degree Courses from University of Peshawar & AIOU, Islamabad, respectively.
(Copies of CV and Educational Testimonials, are attached as Annexure "B" & "C", respectively)
3. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16), vide Advertisement No.01/2009, dated: 26.01.2009.
(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "D")

4. That appellant, being qualified, applied for one of the aforementioned advertised posts of SSTs (BPS-16) and gone through the entire process of selection successfully, eventually she, on the recommendation of KP PSC, was appointed as SST (Gen) BPS-16, on regular basis, vide Notification Endorsement No.4969-79/File No.2/A-14/SST(F)/PSC/Apptt: dated: 30.01.2012.
(Copy of Appointment Notification dated: 30.01.2012 alongwith Medical Certificate dated: 23.12.2011, is attached as Annexure "E")
5. That appellant was subsequently adjusted in Govt Girls High School, Sra Shah, Tribal District Mohmand i.e. against vacant Post, vide Order dated: 16.02.2012.
(Copy of Adjustment order dated: 16.02.2012 alongwith charge report dated: 22.02.2012, is attached as Annexure "F")
6. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however she has unilaterally been shunt-out from service, vide impugned Notification dated: 05.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.
(Copies of Impugned Notification dated: 05.04.2019, is attached as Annexure "G")
7. That appellant preferred departmental appeal dated: 16.04.2019 to respondent No.1 which was received vide Diary No. 1001 dated: 16.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.
(Copy of Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number, is attached as Annexure "H")
8. That appellant, being aggrieved of impugned notification dated: 05.04.2019 and not considering her departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

G R O U N D S:

- A. That impugned Notification dated: 05.04.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor she has been provided equal protection of law, rather she has not been provided fair opportunity to defend himself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
- C. That neither regular enquiry was conducted into the guilt of the appellant nor she has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterm-partem.

D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.

E. That appellant has served the department with zeal, devotion and to the best of her abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

I. 2011 SCMR 1581

“Appointment order found to be bogus/fake/irregular Validity Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possession of requisite qualification by him or his appointment to be made by an incompetent officer Department had not found performance of employee to be unsatisfactory Impugned order was set aside in circumstances”

II. 2004 SCMR 303

“Appointment of Civil Servants were made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities.”

III. 2016 SCMR 1299

“The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program.”

IV. 2010 PLD SC 483

“Principle of Audi-alterm-Partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him”

F. That any other grounds, with the permission of this Hon’ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 05.04.2019 of respondent No.2 alongwith Pre and Post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, hence be set at naught and appellatant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case, may also be granted.

J Jehan

Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Mehsud

&

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

VERIFICATION:

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

J Jehan
Deponent
MAHMOOD AHMED
ATTESTED
NOTARY PUBLIC
PESHAWAR HIGH COURT

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

C.M No.____/2019
In
Service Appeal No.____/2019

Mst. Sarwat JehanAppellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 othersRespondents

**APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE
TITLED SERVICE APPEAL**

Respectfully Sheweths-

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
4. That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.
5. That there is no legal bar to grant the subject relief, rather grant of status quo will prevent miscarriage of justice to be occasioned.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.

Sarwat Jehan

Appellant

Through

Amin ur Rehman Yusufzai

Sajjad Mehsud

&

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019

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

C.M No.____/2019
In
Service Appeal No.____/2019

Mst. Sarwat JehanAppellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 othersRespondents

AFFIDAVIT

I, Mst. Sarwat Jehan D/O Gul Rehman, Ex-SST (Gen), R/o Village Ganjai, Tehsil Takhbhai, District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying 'Petition' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

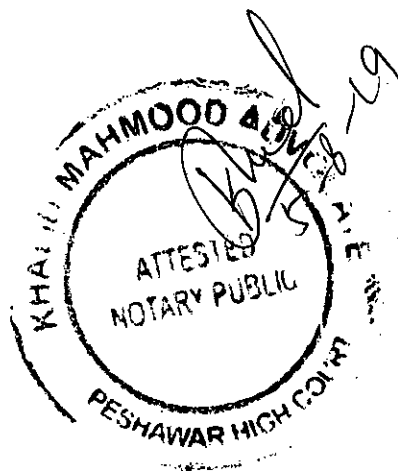
Sarwat Jehan

Identified By:

DEPONENT
CNIC #: 1602-0107092-0

Amin-ur-Rehman Yusufzai
Advocate, Peshawar

Amin-ur-Rehman Yusufzai



⑤

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

Service Appeal No.____/2019

Mst. Sarwat Jehan. **Appellant**

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others **Respondents**

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Sarwat Jehan D/O Gul Rehman, Ex-SST (Gen),
R/o Village Ganjai, Tehsil Takhbhai, District Mardan.

RESPONDENTS:

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt



Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 05.08.2019



حکومت پاکستان

قانون شناسی کورس

16102-0107092-0

نام: *محمد امجد*

پتہ: *گورنمنٹ*

پتہ کورس: *ایچ ایچ*

درجہ: *بی اے*

19/04/198

Amjad

Amjad



TT130M

16102-0107092-0

قانون شناسی کورس
پتہ کورس: *ایچ ایچ*

13282013100

سکول پتہ: *ایچ ایچ*

26/01/2022

26/01/2012

تاریخ: *26/01/2022*



ATTESTED

RESUME

SARWAT JEHAN

ANNEX "B"

9

Address: Village Ganjai Tehsil Takht Bhai District Mardan.
Cell No: 0345-9471608

Objective

I seek a challenging career that utilize my skills, abilities and provide an opportunity to work in a professional environment. I solemnly believe in hard work and devotion and hence, offer my services to the best of my capabilities.

Personal Profile

Father Name : Gul Rahman
D/O/B : 19-04-1982
Religion : Islam.
CNIC : 16102-0107092-0
Domicile : Mohmand (KPK)
Nationality : Pakistani.
Marital Status : Single

Educational Qualifications

Degree / Certificate	Marks/Obt	Division	Board/University
MSc (Botany)	702/1200	2 nd	University of Malakand
BSc	330/550	1 st	University of Peshawar
M.Ed	730/1200	1 st	AIOU Islamabad
B.Ed	560/1100	2 nd	University of Peshawar

EXPERIENCE :

- 10 years experience as a Teacher.

Languages :

- English
- Urdu
- Pashto

ATTESTED

University of Peshawar
(Pakistan)

Session ANNUAL 2007

SARWAT JEHAN

DAUGHTER

of

GUL REHMAN

and a student / Private Candidate of MARDAN COLLEGE OF EDUCATION, MARDAN

having passed the prescribed Examination held in AUGUST 2007 is this day admitted by the

University of Peshawar to the Degree of

Bachelor of Education

In SECOND Division in Theory

In FIRST Division in Teaching practice

In SECOND Division in Aggregate

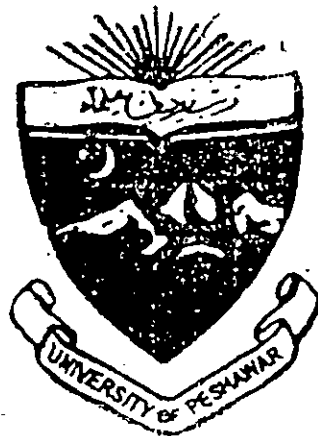
~~The~~ She Passed also in FOUNDATION OF EDUCATION as an ELECTIVE Subject
The Examination was taken as a whole ~~in parts~~

Serial No 019596

Registration No. 2001-ME-32

Roll No. 1028

Result declared on JANUARY 12, 2008



Attested
Zehan

Zeenat Jehan
Senior Subject Teacher
BPS-16
G.G.H.S.S Takht Bhui

Registrar

Countersigned

Vice-Chancellor

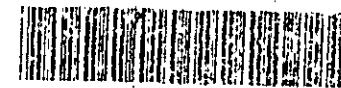
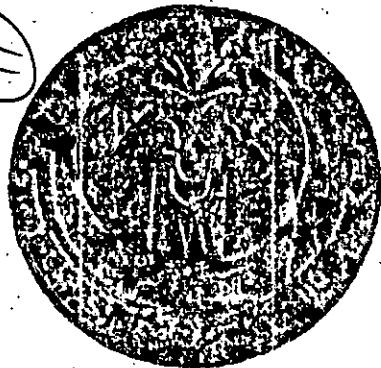
ATTESTED

ANNEX

10

UNIVERSITY OF MALAKAND
PAKISTAN

Serial No. 001515



Session 2003-2005

SARWAT JEHAN Daughter of GUL REHMAN Registration No. 2004570037 Student of Govt. Jahanzeb College, Saidu Sharif Swat having passed the prescribed examination held in Oct-Nov, 2005 under Roll No. 30483 is admitted by the University of Malakand to the degree of

Master of Science

in Botany in Second Division

The examination was taken as a whole.

ATTESTED

Controller of Examinations

Countersigned

Result Declared on 21-Mar-2006

Issuance Date 20-Dec-2010

m. Rasool
Vice-Chancellor

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar
(Pakistan)

Session ANNUAL 2003

SARWAT JEHAN

DAUGHTER

of

GUL REHMAN

and a student of GOVT. GIRLS DEGREE COLLEGE MARDAN

having passed the prescribed examination held in JUNE 2003

is this day admitted by the University of Peshawar to the Degree of
Bachelor of Science

in FIRST Division

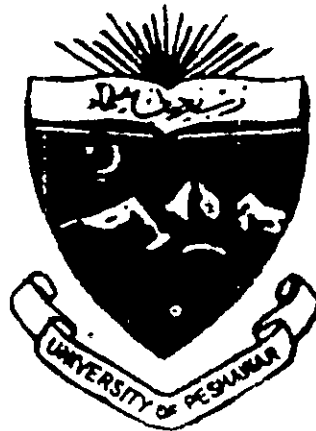
The Examination was taken as a whole / ~~in parts~~

Serial No. 028098

Registration No. 2001-MG-32

Roll No. 5426

Result declared on OCTOBER 11, 2003



Registrar

Countersigned

MANJUN

Vice-Chancellor

ATTESTED

S.No. 118589
Roll No. 51119

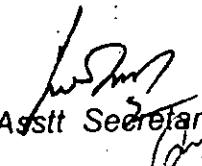
Group: Pre-Medical



Marks Improved

Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2002-ANNUAL

This is to Certify that Sarwat Jehan Daughter of Gul Rehman
and a resident of Mardan District Registered No. 76-B/GM-99
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2002 as a Private Candidate. She obtained 766 Marks out of 1100
and has been placed in Grade B Representing Very Good. She has been awarded Grade - on the
basis of internal assessment by the institution concerned. The Examination was taken as a whole.


Asstt Secretary

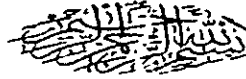

Secretary

ATTESMED

Issued in lieu of Certificate Roll No. 50820 (Inter Annual - 2001)
This certificate is issued without alteration or erasure.

S.No. 55249

Roll No. 107516



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1999 – ANNUAL
(Science Group)

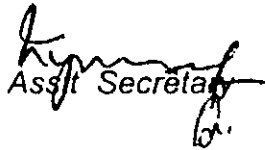
This is to Certify that Sarwat Jahan Son / Daughter of Gul Rehman
and a student of Govt. Girls High School Takht Bhai Mardan has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1999 as a Regular
candidate. He / She obtained 609 Marks out of 850 and has been placed in Grade A Representing Excellent

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

He / She has been awarded Grade A on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form April 19, 1982


Ass't Secretary


Secretary

ATTESTED

NWFP PUBLIC SERVICE COMMISSION**2- Fort Road Peshawar Cantt:****Website: www.nwfppsc.gov.pk**Dated: 26-01-2009**ADVERTISEMENT No. 01 / 2009.**

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:**

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators:

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute. (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes. **ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

DIRECTORATE OF INDUSTRIES, COMMERCE, MINERAL DEV, LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:** NOTE: In case of non-availability of candidates possessing the

ATTESTED

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5.	Islamiyat	02	Merit Quota
6.	Pak: Study	03	Merit Quota
7.	History-Cum-Civics	02	Merit Quota
8.	Economics	02	Merit Quota
9.	English	02	Merit Quota
10.	Statistics	02	Merit Quota
11.	Maths	02	Merit Quota
12.	Biology	02	Merit Quota
13.	Chemistry	02	Merit Quota
14.	Physics	02	Merit Quota

(S.No. 52) **Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) **Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 54) **Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram , Mansehra , Shangla , Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

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17

(S.No. 55) **Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) **Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

(S.No. 57) **Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) **Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.**

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

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(S.No. 59) **Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.**

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

ATTESTED

1-12 (18)

(S.No. 66) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.
AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-14. **ELIGIBILITY:** Male.
ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

(S.No. 67) One (01) Post of Female office Assistant.

QUALIFICATION: Bachelor degree from recognized University.
AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-14. **ELIGIBILITY:** Female.
ALLOCATION: Merit.

CORRIGENDUM

- The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
- The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

- Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

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ATTESTED

- (143/19)
- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
- Written Test in the Subject.
 - General Knowledge or Psychological General Ability Test.
 - Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Manshra.
- Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

ATTESTED

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(Atta Ur Rehman)

Secretary

**NWFP Public Service Commission
2-Fort Road Peshawar Cantt: Ph: 9212962**

ANNEX 'E'
90

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@tchgo.com



Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST Sc) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further Services placed at the disposal of Director of Education FATA for further posting against vacant SST Sc. posts:-

SNO	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1	2	3	4	5	6	7
1	Sarwat Jehan	Gul Rahman	Khyber Agy	1	Ithad Colony Dist & Tehsil Takht Bhal Mardan	Services placed at the disposal of Director of Education FATA for Further posting against vacant SST Sc posts
2	Robta Shams	Shams Ur Rahman	Mohmand Agy	1	Village Matti Dara Musa Khel Mohmand Agency	Services placed at the disposal of Director of Education FATA for Further posting against vacant SST Sc posts
3	Zahra Niaz	Fazal-e-Dayan	Mohmand Agy	1	House No. 545 Sector 9 Street 5 Hayat Abad	Services placed at the disposal of Director of Education FATA for Further posting against vacant SST Sc posts

Terms and conditions:-

1. Her services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
2. In case, she is already in Government service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.
3. Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.
4. She should join her post within 30 days of the issuance of this notification. In case of failure to join her post within one month of issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.

(Signature)

ATTESTED

(90) A

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**
Ph No. 091-9210389, 9210938
Email: desekpk@yahoo.com

NOTIFICATION:

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of secondary School Teacher (SST Sc) in BPS-16 (Rs. 10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in teaching Cadre on the terms and conditions given below with immediate effect and further services placed at the disposal of Director of Education FATA for further posting against vacant SST Sc Posts:

S.No	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1.	Sarwat Jehan	Gul Rahman	Khyber Agy	1	Ithad Colony Dist & Tehsil Takht Bhai Mardan.	Service Placed at the disposal of Director of Education FATA for further posting against vacant SST Sc Post.
2.	Robia Shams	Shams ur Rahman	Khyber Agy	1	Village Matti Data Musa Khel Mohmand Agency	Service Placed at the disposal of Director of Education FATA for further posting against vacant SST Sc Post.
3.	Tahira Naz	Fazal-e-Dayan	Khyber Agy	1	House No. 545 Sector 9 Street 5 Hayatabad	Service Placed at the disposal of Director of Education FATA for further posting against vacant SST Sc Post.

Terms and conditions:

- Her services will be considered regular but without pension & gratuity in terms of section 19 of the NWFP civil servants Act, 1973 as amended vide NWFP civil servants (Amendments) Act, 2005. she will however be entitled to contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
- In case, she is already in government; service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of contributory provident fund allowed of her under new appointment.
- Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one month pay/allowances shall be forfeited to the government.
- She should join her post within 30 days of the issuance of this notification. In case of failure to join her post within one month of issuance of this notification her appointment will expire automatically and no subsequent appeal etc shall be entertained.

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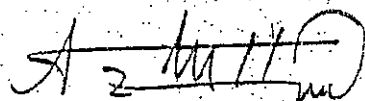
5. She would be on probation for a period of one year extendable for another one year.
6. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned
9. The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of her posting orders.
10. The EDOs concerned will verify their documents before release of pay.
11. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining her duty.

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

4769...75
Endst: No. 1 File No.2/A-17/SST(F)/PSC/Apptt: Dated Peshawar the 30/01/2012

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Director of Education FATA Warsak Road Peshawar.
4. All Agency Account: Officer in FATA.
5. Official Concerned;
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File



Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

30/1/2012


ATTESTED

(21)
A

5. She would be on probation for a period of one year extendable for another one year.
6. she will governed by such rules and regulations as may be issued from time to time by the Govt.
7. Her services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted at all concerned.
9. The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post of otherwise after one month of the issue of her posting orders.
10. The EDOs concerned will verify their documents before release of pay.
11. Her Seniority will be maintained as determined by the Khyber Pakhtunkhaw public service commission.
12. No TA/DA will be allowed to the appointee for joining her duty.

Muhammad Rafiq Khattak
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endost No. 4969.....79/File No. 2/A -17/SST(F)/PSC/Apptt: dated Peshawar the 30/01/2012
Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Secretary Khyber Pakhtunkhwa Public service Commission Peshawar
3. Director of Education FATA Warsak Road, Peshawar
4. All Agency Accounts Officer in FATA.
5. Official Concerned.
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
8. M/File.

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar


ATTESTED

MEDICAL CERTIFICATE

Name of official SARWAT JEHAN
 Caste or race KHYBER
 Father's name GUL RAHMAN
 Residence Village: Ganjoi, Teh. Jarkht Bhai,
District: Mardan.
 Date of birth 19-04-1982
 Exact height by measurement 5-6"
 Personal mark of identification NIL
 Signature of the official _____
 Signature of head of office _____

Seal of office _____

I do hereby certify that I have examined Mr. SARWAT JEHAN a candidate
 for employment in the Office of the Education Deptt SET.
 and cannot discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except NIL.

I do not consider this as disqualification for employment in the office of the _____
 His age according to his own statement 24 years year and by appearance about
 year. 29 years

Secretary
 Standing Medical Board
 Police Services Hospital,
 Peshawar

Medical Superintendent
 Police Services, Hospital
 Peshawar
 MEDICAL SUPERINTENDENT, 23/12/011

ATTESTED

CIVIL HOSPITAL: _____

LEFT HAND THUMB AND FINGER IMPRESSIONS _____
 Physician
 Police Services, Hospital,
 Peshawar.



DIRECTORATE OF EDUCATION FATA

WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

NO. ANNEX 154 / DATE 16/2

(23)

ORDER

Consequent upon their appointment as Secondary School Teachers (Science) in BS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Directorate of Education FATA vide Director Elementary & Secondary Education, Khyber Pakhtunkhwa's Notification No. 4969-76/File No.2/A-17/SST(F)/PSC/Apptt: dated 30-01-2012, the following SSTs(Science) are hereby adjusted in the schools noted against each with immediate effect:-

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Ms. Sarwat Jehan D/O Gul Rahman (Khyber) Ithad Colony Tehsil Bhai Distt:Mardan	GGHS Sra Shah Mohmand Agency	Against newly created post
2	Ms. Robia Shams D/O Shams Ur Rehman (Mohmand) Village Matti Dara Musa Khel, Mohmand Agency	GGHSS Ghallanai Mohmand Agency	Against vacant post
3	Ms. Tahira Naz D/O Fazal-e-Dayan (Mohmand) House No. 545 Sector 9 Street 5 Hayat Abad, Peshawar	GGHS Subhan Khawar, Mohmand Agency	-do-

Note:-

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

(FAZLI MANAN)
DIRECTOR EDUCATION
FATA PESHAWAR

Endst: No. 2408-15 /A-I/Apptt: of SST Science(F)/(PSC) Dated Peshawar the 16/2 /2012

Copy forwarded to the:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar w/r to his Notification cited above.
- 2 Agency Education Officer, Mohmand Agency at Ghallanai
- ✓ 3 Agency Accounts Officer, Mohmand Agency at Ghallanai
- 4 Principal/Headmistress concerned
- 5 Officials concerned

ATTESTED

ADDL. DIRECTOR (ESTAB)

CHARGE REPORT.

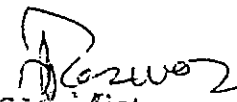
Miss Sarwat Jehan D/o Gul Rahman
has been appointed as SST (SCIENCE)
in Govt Girls High School which has
recently upgraded to high section
(G.G.H.S Sra Shah (Mohmand Agency))

Endst: No: 2408-15 Dated: 16-02-2012.
Notification NO: 4989-76
File No: 2/A-17 /SST (F) PSC /
APPT: 16-02-2012


Charge giver

Charge Taker

SJehan


Reserve
District Officer
G.G.H.S

22-02-2012


REGISTERED



ANNEX 'B'

25

NOTIFICATION

1. WHERE AS: one Mst. Sarwat Jehan D/O Gul Rehman who herself appointed/adjusted as SST (G) in GGHS Sra Shah District Mohmand vide Notification No. DE FATA 2408-15 dated 16/02/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Sarwat Jehan D/O Gul Rehman, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. DE FATA 2408-15 dated 16/02/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Sarwat Jehan D/O Gul Rehman in the interest of Public Service.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa-Peshawar

5861-66
Endst. No. _____ dated 5-4 2019

Copy forwarded with the request to take legal action and recover the outstanding amount from the aforesaid person/individual to the:-

1. Deputy Commissioner, Tribal District Mohmand.
2. District Education Officer Tribal District Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer Tribal District Mohmand to co-operate in the matter.
4. Head Mistress GGHS Sra Shah District Mohmand,
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

ATTESTED

Deputy Director (Constn)
Merged Districts

~~ATTENDED~~

2018
MST Govt of Jharkhand SST (S)
GPHS Saa Sraah
Mekhand Distt

Dear Sir,
I am writing to you regarding the matter of my removal from post and charge. I have long service to the Government of Jharkhand.

I am a qualified teacher and have long service to the Government of Jharkhand. I was appointed as SST in 1988. I have been appointed as SST in 1988. I have been appointed as SST in 1988.

I have been appointed as SST in 1988. I have been appointed as SST in 1988. I have been appointed as SST in 1988.

I am writing to you regarding the matter of my removal from post and charge. I have long service to the Government of Jharkhand.

Yours faithfully,
K. P. K. P. K.

To
Secretary of Education
K. P. K. P. K.

ANNEX

(96)



(25)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)/9-4/SST//NMTD/Re-Instatement2019
Dated Peshawar the 26.04.2019

To,

1. The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa,
Peshawar.
2. The Director Education,
Newly Merged Tribal Districts,
Warsak Road,
Peshawar.

Subject: - **APPEAL FOR RE-INSTATEMENT**

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of list bearing No. 1257 dated 19.04.2019 alongwith connected documents in respect of the following female Secondary School Teachers (SSTs) General of merged tribal districts, for further necessary action as per rules/policy. please.

S.No.	Name / F. Name	Address
1.	Mst. Seema D/O Ikramud Din	GGMS Nahqi, Tribal District Mohmand
2.	Mst. Ghazala Sana D/O Sana ullah	GGHS, Azeem Kor, Tribal District Mohmand
3.	Mst. Ishrat D/O Bahadar Sher	GGMS Kachkol, Tribal District Mohmand
4.	Mst. Asma D/O Muhammad Akbar	GGMS Sabz Ali, Tribal District Mohmand
5.	Mst. Tahira Shah D/O Fazli Dayan	GGMS Prang Ghar, Tribal District Mohmand
6.	Mst. Sarwat Jehan D/O Gul Rehman	GGHS Sra Shah, Tribal District Mohmand
7.	Mst. Nizaqat D/O Said Ali Shah	GGHS Shalam Salai, Tribal District Mohmand
8.	Mst. Nasrat D/O Hayat Khan	GGHS Badagai, Tribal District Bajaur
9.	Mst. Nargis D/O Bahadar Khan	GGMS Zarif Abad, Tribal District Bajaur
10.	Mst. Basra Begum D/O Fazli Wahab	GGHS Raghagan, Tribal District Bajaur
11.	Mst. Shabana Bibi D/O Abadul Sattar	GGHS Anayat Kaly, Tribal District Bajaur
12.	Mst. Basmina D/O Mir Alam	GGMS Dag Mula, Tribal District Mohmand

Yours Faithfully,

Encl: as above.

ATTESTED


SECTION OFFICER (PRIMARY)

Endstt: of even Number & Date:

Copy to the:-

PS to Secretary, E&SE Department, Peshawar.

SECTION OFFICER (PRIMARY)

وکالت نامہ

بعدالت فیکر کونوٹو اور سروس ٹرسٹ سوسائٹی

مجاہ ٹرسٹ صبا نام گونٹ

منجانب روہاقت دعویٰ اجرم سروس و سوسائٹی

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکھ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام

امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ، فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ،

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ باعث ہونے یا بزور تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر دائرہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و گمرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہائی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا ایئر سز کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری نمس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند رہے مورخہ _____ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

Amin ur Rehman Yousafzai Advocate High Court, & Federal Shariat Court of Pakistan.

(Signature)

Sajjad Ahmad Mehsud Advocate High Court Peshawar

Adv. Khalid Khan Be 18-11-18 (Signature)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1027/2019

Mst. Sarwat Jehan.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

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for Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission Peshawar

UMS88642533

Date. 05/07/2020

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1027/2019

Mst. Sarwat Jehan.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....**Respondents**

PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)

PRELIMINARY OBJECTIONS:

1. The appellant neither applied nor was recommended against any of the advertised posts. She is not a genuine recommendee / selectee of the Public Service Commission in respect of the post.
2. That the instant Service Appeal is not maintainable against the replying Respondent No.3.
3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
4. That the appellant is misleading this Honorable Service Tribunal.
5. That instant Service Appeal is liable to be dismissed with special cost as the same is based on ulterior motives of the appellant.
6. Instant service appeal is based on misrepresentation.

ON FACTS:

- 1-2. Pertains to personal information of the appellant, no comments.
3. That the Khyber Pakhtunkhwa Public Service Commission advertised 973 posts of SETs/SSTs vide Advertisement No. 01/2009 S.No. 55 dated 26.01.2009 with the following qualifications:

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(Annex-A)

Furthermore recommendation and list of candidates who were recommended to Government for appointment is (Annex-B).

2

4. Incorrect. The appellant neither applied nor was recommended against any of the said posts. List of the genuine recommendees is annexed as B. The appellant has not provided any proof of her recommendation by the Public Service Commission.

5-8. Not pertaining to Public Service Commission.

GROUND.


A-C. Not pertaining to Public Service Commission.

D. Incorrect. The appellant is not a recommendee / selectee of the Khyber Pakhtunkhwa Public Service Commission as explained in Para 4.

E. Not pertaining to Public Service Commission.

F. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.


For 
CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)

Shahid

AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

DEPONENTS

En 
**CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)**

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No:1027/2019

Mst: Sarwat Jehan Ex SST (G) B-16 District MardanAppellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.Respondents

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Asstt: Director (Lit: II)
E&SE Department, Khyber
Pakhtunkhwa, Peshawar.

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 1027/2019

Mst: Sarwat Jehan Ex SST (G) B-16 District Mardan.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.....Respondents.

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No:1-2.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That the instant Service Appeal is not maintainable in its present form.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.

- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 5/4/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 5/4/2019.
- 15 That the appointment letter of the appellant has been declared as fake and bogus by the Respondent Department.
- 16 That the Notification dated 5/4/2019 has correctly been issued by the Respondent Department after observing all the codal formalities.

ON FACTS.

- 1 That Para-1 needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 5/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 30/01/2012 of the appellant is fake & bogus with no cogent record in the Respondents No.2 & 3 offices.
2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct, hence, needs no comments.
- 4 That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 30/01/2012 is baseless & liable to be rejected in favor of the Respondents. **(Copy of the Ad; dated 26/01/2009 is Annexure-A).**
- 5 That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 16/2/2012 at GGHS Sara Shah Mohmand against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 05/04/2019 by the competent authority **(Copy of the said Notification dated 05/04/2019 is Annexure-B).**

- 6 That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 5/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & where against, no departmental has been filed by the appellant, hence the notification dated 5/4/2019 has got final under the rules against the appellant.
- 7 That Para-7 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 5/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & where against, no departmental has been filed by the appellant, hence the notification dated 5/4/2019 has got final under the rules against the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority.
- 8 That para-8 needs no comments , however, the Respondents further submit on the following grounds inter alia

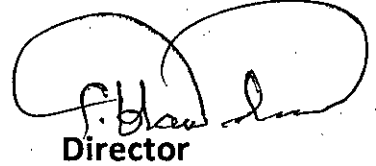
ON GROUNDS.

- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case having no question of violation of Article 10-A of the constitution of 1973, hence, the stance of the appellant is baseless & liable to be rejected.
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as regular inquiry has been conducted vide Notification bearing endst; No.8154-63 dated 4/8/2019 by the competent authority who declared the documents & 1st appointment as fake & bogus, hence, the plea of the appellant is without any justification.
- D **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification on the grounds that his 1st appointment Notification dated 30/01/2012 of the appellant have been found fake & bogus by the Respondent Department, hence, his services against the SST (G) B-16 post has been disowned by the competent authority vide Notification date 4/4/2019 under the relevant provisions of law & rules.
- E **Incorrect & not admitted.** The plea of the appellant is without legal justification & liable to be rejected & the mentioned judgments of the apex courts of law do not apply upon the case of the appellant in the given circumstances of the case.

Legal. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated ___ / ___ /2020



Director

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2)



Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)

AFFIDAVIT

I, Hayat Khan Asstt: Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.



Deponent

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

16

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A effective by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Devt Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.
AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.
ALLOCATION: Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.
AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.
ALLOCATION:

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators:

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.
AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes.
ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV. LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi Government Mining Industries registered under the Mines Act, 1923.
AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.
ALLOCATION: NOTE: In case of non-availability of candidates possessing the

STED

1/1

Annexure : D

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt.

Website: www.nwfppsc.gov.pk

16

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A. by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev; Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..
AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.
ALLOCATION: Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..
AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.
ALLOCATION:

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

S.No. 03) Five (05) Posts of Data Entry Operators:

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.
AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes.
ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

DIRECTORATE OF INDUSTRIES, COMMERCE, MINERAL DEV, LABOUR & TECHNICAL EDUCATION DEPARTMENT.

S.No. 04) One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi Government Mining Industries registered under the Mines Act, 1923.
AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.
ALLOCATION: NOTE: In case of non-availability of candidates possessing the

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provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.
For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5.	Islamiyat	02	Merit Quota
6.	Pak. Study	03	Merit Quota
7.	History-Cum-Civics	02	Merit Quota
8.	Economics	02	Merit Quota
9.	English	02	Merit Quota
10.	Statistics	02	Merit Quota
11.	Maths	02	Merit Quota
12.	Biology	02	Merit Quota
13.	Chemistry	02	Merit Quota
14.	Physics	02	Merit Quota

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 54) Ninety Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Manshra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

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55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUCATION AND MAN POWER TRAINING
DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.

ALLOCATION: Merit.

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

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No. 67) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.
AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Male.
ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

S.No. 67) One (01) Post of Female office Assistant.

QUALIFICATION: Bachelor degree from recognized University.
AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.
ALLOCATION: Merit.

CORRIGENDUM

- The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt. No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
- The Post of Reader Advertised in Advt. No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

- Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored, except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

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NOTIFICATION

1. WHERE AS: one Mst. Shabana Bibi D/O Abdus Sattar who herself appointed/adjusted as SST (G) in GGMS Inayat Killi District Bajaur now working in same side vide Notification No. 7223-29/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 27/10/2012 and No. 12414-17/A-1/Apptt: of SST (General) (PSC)2012 dated 02/11/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Shabana Bibi D/O Abdus Sattar, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. 7223-29/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 27/10/2012 and No. 12414-17/A-1/Apptt: of SST (General) (PSC)2012 dated 02/11/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Shabana Bibi D/O Abdus Sattar in the interest of Public Service.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. _____ dated 5-4-2019

Copy forwarded to the:-

1. Deputy Commissioner, Tribal District Bajaur with the request to take legal action.
2. District Education Officer Tribal District Bajaur with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer Tribal District Bajaur to co-operate in the matter.
4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

ATTESTED

Deputy Director (Estab)
Merged Districts