

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
- TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD

Appeal No. 3242/2021

Safia Bibi.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & Others..... Respondents

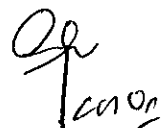
SERVICE APPEAL

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

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Dated: 27-01-2023


District Education Officer (F)
Torghar.
(Respondent No. 3)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD**

Appeal No. 3242/2022

Safia Bibi.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & Others..... Respondents

Khyber Pakhtunkhwa
Service Tribunal

SERVICE APPEAL

Case No. 3659

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Dated 17/2/2023

Respectfully Sheweth:-

Comments on behalf of respondents are submitted as under:-

PRELIMINARY OBJECTIONS:-

1. That the appellant has no cause of action to file the instant appeal against the answering respondents.
2. That as per directions of Peshawar High Court Abbottabad Bench in Writ Petition No. 752-A/2022 dated 17-01-2013 Respondent No. 1 constituted inquiry committee in order to probe into allegations levelled against the appellant and inquiry committee submitted report wherein, it was recommended that the Notification No. 2031 dated 18-09-2012 regarding the Removal from Service of appellant was based on facts and valid. Hence, Respondent No. 1 regretted the representation of appellant accordingly vide Notification dated 18-01-2021 and appellant badly failed to impugn the Notification dated 18-01-2021 before this Honorable Tribunal hence, Service Appeal in hand is liable to be dismissed on this score alone from this Honorable Tribunal.
3. That the appellant has no locus standi to file the present Service Appeal.
4. That the appellant did not come to this Honorable Tribunal with clean hands. Hence, not entitled for any relief.
5. That the Notification No. 2031 dated 18-09-2012 regarding the Removal from Service was issued in accordance with the Rules, Law & Policy by the Competent Authority. Hence, same is liable to be maintained.

6. That instant Service Appeal is hopelessly time barred hence, liable to be dismissed.
7. That the instant Service Appeal is not maintainable in its present form hence, liable to be dismissed.
8. That the appellant has suppressed the material facts from this Honorable Tribunal, hence, not entitled for any relief and appeal is liable to be dismissed without any further proceeding.

Factual Objections:-

1. That the Para No. 1, of the instant Service Appeal pertains to record hence, need no comment.
2. That the Para No. 2, of the instant Service Appeal is correct.
3. That the Para No. 3, of the instant service appeal as composed is incorrect hence, denied and not admitted. Inquiry committee intimated the appellant through Registered letter No. 1717 dated 08-03-2013 to appear before the committee on 12-03-2013 but appellant appeared on 14-03-2013 and questionnaire was served to the appellant and she submitted a written reply accordingly. (Copy of the questionnaire & reply of the appellant is annexed herewith as Annexure "A" & "B" respectively)
4. That the Para No. 4, of the instant service appeal as composed is incorrect hence, denied and not admitted. In pursuance to the directions of Peshawar High Court Abbottabad Bench in Writ Petition No. 752-A/2022 dated 17-01-2013 Respondent No. 1 constituted inquiry committee in order to probe into allegations levelled against the appellant and inquiry committee submitted report wherein, it was recommended that the Notification No. 2031 dated 18-09-2012 regarding the Removal from Service of appellant was based on facts and valid. Hence, Respondent No. 1 regretted the representation of appellant accordingly vide Notification dated 18-01-2021 and appellant badly failed to impugn the Notification dated 18-01-2021 before this Honorable Tribunal hence, Service Appeal in hand is liable to be dismissed on this score alone from this Honorable Tribunal. (Copy of the inquiry report and Notification dated 18-01-2021 is annexed herewith as Annexure "C" & "D" respectively)

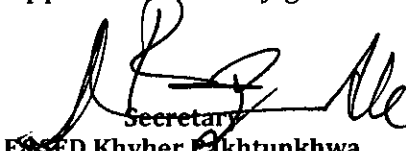
GROUNDS:-

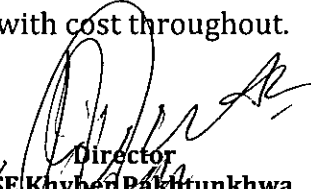
- i. That ground i, as composed is incorrect hence, denied and not admitted. Inquiry committee intimated the appellant through Registered letter No. 1717 dated 08-03-2013 to appear/participated before the committee on 12-03-2013 but

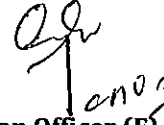
appellant appeared on 14-03-2013 and questionnaire was served to the appellant and she submitted a written reply accordingly.

- ii. That ground ii, as composed is incorrect hence, denied and not admitted. Appellant submitted her reply before the inquiry committee. Detailed reply in this regard has already been given in Para No. 03 of the factual objections.
- iii. That ground iii, as composed is incorrect hence denied and not admitted.
- iv. That ground iv, as composed is incorrect hence denied and not admitted. Comprehensive reply has already been given in Para No. 4 of the factual objections.
- v. That ground v, as composed is incorrect hence, denied and not admitted as comprehensively reply has already been given in above Paras.
- vi. That the respondents seek leave of this Honorable Tribunal to raise additional points at the time of arguments.

It is, therefore, very humbly prayed that in the light of forgoing comments the service appeal in hand may graciously be dismissed with cost throughout.


Secretary
E&SE Khyber Pakhtunkhwa
Peshawar
(Respondent No.1)


Director
E&SE Khyber Pakhtunkhwa
Peshawar
(Respondent No.2)


District Education Officer (F)
Torghar

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD**

Appeal No. 3242/2021

Safia Bibi.....Appellant

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SERVICE APPEAL

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

AFFIDAVIT

I, Mst. Nadia Begum, District Education Officer (F) Torghar,
do hereby affirm and declare on oath that the contents of forgoing comments
are correct and true according to the best of my knowledge and belief and
nothing has been suppressed from this Honorable Tribunal.

Nadia Begum

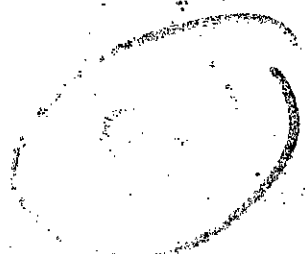
DEPONENT

ATTESTED



17-02-2021

مسماة صفیہ بی بی دختر سیدی شاہ لیدی ٹیچر گورنمنٹ گریجویٹ سکول لوہانہ



(109)

سوال نامہ سلسلہ انٹروی

یہ کہ زبردستی کو آپ کے کس میں بحوالہ نوٹیفکیشن نمبر E & SED/4-4/ENQ/Tangrai/12 مورخہ 25/2/2013 سیکرٹری ایجوکیشن خیر بختون خواہ کی جانب سے انٹروی آفیسر کے پاس کو ڈسٹرکٹ ایجوکیشن آفیسر آرڈر نے لکھی ہے برطرف کیا ہے اور آفیسر کے حکم سے ایجوکیشن آفیسر کے پاس سے اس میں حکم تعلیم نے آفیسر کے احکامات جاری کیے ہیں۔ اس سے اس میں آپ سے کچھ مسائل کے جانے میں جو حال نامہ جان کر صفائی پر جینی خواہتے ہیں تاکہ زبردستی کو صفائی برطرف ہو سکیں۔

سوالیات

- 1- آپ کے اس سکول میں کیفیات پوری ہوں؟
- 2- آپ کے الزام ہے کہ آپ نے صرف ایک ہی مورخہ 18/11/2009 کو صفائی کی ہے اور اس کے بعد ڈیڑھ سال سے اس کو صفائی کی گئی ہے۔ اس کو صفائی کی گئی ہے۔
- 3- آپ کے تحت Pst ٹیچر تک خواہ وہ سول کی ہے اور تک ہے آپ کے تحت اسکول کی صفائی ٹیچر بشیر بالا اور ملازم درج چہارم عظیم اور صفائی باغیچہ کے پیمانے آپ 18/11/2009 کے بعد اب تک مسلسل پیمانے میں جس کی بنا پر ESD کے پیمانے کو دیا گیا ہے اس کو صفائی کی گئی ہے۔ اس کو صفائی کی گئی ہے۔
- 4- آپ کے تحت محکمہ اللہ تعالیٰ کو حال نامہ جان کر تحریری طور پر وضاحت کریں کہ آپ نے اس کو صفائی کی ہے اور اس کو صفائی کی ہے؟
- 5- عام تاثر ہے کہ صفائی ٹیچر اس سکول پر رہتے ہیں اور استاد/اساتذہ ان کو صفائی کی ہے۔ اس میں اس کو صفائی کی گئی ہے۔ اس کو صفائی کی گئی ہے؟

خدمت جناب چیرمین انٹونیٹری کمیٹی صاحب

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جوابات سلسلہ انٹونیٹری

جناب والا -

1- میڈیا رپورٹ 16/11/2009 کو میڈیا آرڈر سوجا ہے . اور 17/11/2009 کو میں نے حاضر و

2- میرے خلاف جو الزام ^{انہوں نے} پیش کیا ہے بالکل غلط اور بے بنیاد ہے . میری حاضری کا ریکارڈ تو

کے پیرا لف ہے . جو کہ باقاعدہ طور پر دفتر متعلقہ ذرا سے تعداد شدہ ہے

3- ماہ جون اور ماہ اگست 2011 اور مئی از 2012 تا مارچ 2013 یہ وہ

ہے . اور اس کے علاوہ صرف 17/11/2009 نوٹورہ بالا 2 ماہ کے علاوہ اس

میں نہ ایسا ٹیگ انڈیکس ہوا ہے . جو کہ یہ میڈیا کمیٹی و قانونی

4- سٹیٹس کی میڈیا ٹیگ شدہ بالور اور ملازم : میں چار مہینے اور فقہانہ

میں مہینے کے دوران میں نے اپنے تمام کاموں کو مکمل کر لیا ہے

تعمیراتی کاموں کے متعلق میں نے اپنے تمام کاموں کو مکمل کر لیا ہے

دبلیو ڈی اے میں سلیبس میں باقی رقم : اپنے سٹوکار نوٹس میں

اور کتب 500 کے نیچے سٹوکار نوٹس میں اہلکار لیا ہے . جو کہ یہ

انہوں نے : مذکورہ سٹوکار نوٹس باقی صاف فراڈ پر مبنی ہے . جسے

دستخط : کارڈنگ سٹیشن مذکورہ صاحبزادہ حامد محمود کا ہے . بنیاد اصل دست

بطور مستند ہے . جواب : ہزارے پیرا لف ہے .

5- میں بحیثیت معلم اللہ پاک . کو حاکمہ مائتہ خان ٹرک ٹریڈر اور غیر وادعا

6- میں نے اپنی ذمہ داری سنبھالی ہے اور اس سلسلہ میں

7- میں نے اپنے تمام کاموں کو مکمل کر لیا ہے

8- میں نے اپنے تمام کاموں کو مکمل کر لیا ہے

9- میں نے اپنے تمام کاموں کو مکمل کر لیا ہے

Amended "E"
V. 407 June please
SA
SA

OFFICE OF THE PRINCIPAL GOVT CENTENNIAL MODEL SCHOOL (BOYS) MANSEHRA.

No: 1740
Dated 08-04-2013

To

(85)

The Secretary to Govt
(E & SE) Department
Khyber Pakhtun Khwa Peshawar.

Subject: INQUIRY REPORT IN RESPECT OF MST. SAFIA BIBI EX PST
GGPS LONIA BASI KHALI DISTRICT TORGHAR.

Memo:

Kindly refer to your Notification No: SO (AB) E & SED/4-4/ENQ/TORGHAR/12 dated Peshawar the 25-02-2013 regarding the subject cited above:

Enclosed please find here with an inquiry report in respect of the subjected teacher for further course of action please.

PRINCIPAL
Govt Centennial Model School
(Boys) Mansehra.

9/11
DSL
19/4/13
440
9/14
S.D (AB)

Govt of Khyber Pakhtunkhwa
Elementary & Secondary
Education Department
S & SE No. 944
Date: 10/4/13

Please speak
20/4/13

Govt of Khyber Pakhtunkhwa
Elementary & Secondary
Education Department
Serial No. 107/2013
Date: 10/4/13

Annex - "E"

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INQUIRY REPORT IN RESPECT OF MST. SAFIA BIBI EX PST
GGPS LONIA BASI KHAIL DISTRICT TORGHAR.

REFERENCE:

Govt of KPK (E & SE) Peshawar vide notification # SO (AB) E & SED/4-4/ENQ/TORGHAR/12 dated Peshawar the 25-02-2013 issued from the office of worthy Secretary KPK (E & SE) Peshawar appointed the following Inquiry committee to probe the allegations leveled against the above mentioned lady teacher.

BACKGROUND:

(I) Mst. Safia Bibi Ex PST GGPS Lonia Basi Khail Torghar Was appointed as PST in BPS-5 vide EDO (E&SE) Mansehra No19626-34 dated 16-11-2009 at GGPS Lonia Basi Khail KD as per record available in her service book.

(II) The EDO (E&SE) Torghar personally visited the said school on 20-06-2012 & noted that the teacher concerned was absent from duty since 18-11-2009 as per attendance register of the said school. The EDO (E&SE) Torghar comprehensively inquired/investigated the absent period through Head Teacher, parents of the children & local inhabitants & got their statements. (copies of attendance register, statement of Head Teacher & statements of Locals/Parents are attached as Annex A-1 to A-3)

(III) The EDO (E & SE) Torghar served the show cause notice vide # 1736/TG/EDO dated 20-06-2012. The teacher concerned submitted the reply of the show cause notice. Therefore, she was removed from services vide notification # 2031/PST (F/P) proceedings (Safia Bibi)/EDO/TG dated 18-09-2012. The said removal order was conveyed to the teacher concerned through registered post at her home address vide post office receipt # 33 dated 23-09-2012. (copies of show cause notice, Reply & Removal order are attached as Annex B-1 to B-3)

(IV) The teacher concerned approached the Honorable Peshawar High Court Abbottabad Bench against the aforesaid removal order dated 18-09-2012 through writ petition # 752 A/2012 titled Safia Bibi Vs Govt of KPK etc.

- (88)
- (2) As per statements on oath dated 20-06-2012 of (08) Nos of locals/parents whose mobile Nos & NIC Numbers & thumb impression are given in the statements clearly state that Mst Safia Bibi was absent from duty since her appointment.
 - (3) The statement dated 20-06-2012 of the Head Teacher Mst Sherbano also proves that Mst Saffia Bibi was absent w.e.f 18-11-2009.
 - (4) The reply of the questionnaire dated 11-03-2013 submitted by the Head Teacher Mst Sherbano before the committee also proves that Mst safia Bibi was absent from duty w.e.f 18-11-2009 & Mst Safia Bibi posses fake & bogus attendance Register at her home.
 - (5) Statement of the chowkidar of the said school also proves that she was absent since 18-11-2009 & Mst Safia bibi has fake attendance Register with her at home.
 - (6) Statement of the locals/parents also proves that she was absent from her duty since her appointment.
 - (7) The reply of the questionnaire dated 14-03-2013 submitted by Mst Safia Bibi Ex PST is not supported by cogent reason, proof/evidence on record .However she denied all the charges leveled against her.
 - (8) The statement of DDO (F) Primary KD Mst Rashida Begum presently SDEO (F) primary Mansehra admitted that she visited the under reference school on 24-11-2010 and Mst Safia Bibi was present on the day of her visit DDO (F) further stated that she signed the register which was presented by Mst Safia Bibi however she did not know about the authenticity of the attendance register as it was told that Mst Sherbano Head Teacher has gone to her home due to illness of her father. The DDO(F) stated that she reached the school at 12:00 pm.It is worth mentioning here that on examining the register signed by the said DDO(F) primary during her visit it has been noted that Mst Sherbano was not present at the spot inspite she was present in the disputed/Fake attendance register. The said DDO (F) primary reached at 12:00 pm as per her statement whereas MST Sherbano has been shown to leave the school at 1:30 pm in the attendance register presented by Mst Safia Bibi. Then why the DDO (F) did not mark Mst Sherbano as absent. If Mst Sherbano was not present then it was the responsibility of DDO(F) to mark her as absent in the said register.

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(V) The honorable court passed a judgment dated 17-01-2013 by treating the said petition as a representation and send the same to respondent No1 (Secretary E&SE) Peshawar with the direction " to probe the matter and passed appropriate order and if the grievance of the petitioner is not redress then she be informed accordingly". The petition was disposed of. (copy of Judgment dated 17-01-2013 is attached as Annex "C")

In compliance with the court direction the worthy Secretary (E & SE) Peshawar appointed the aforementioned inquiry to probe the matter.

- PROCEEDINGS:
- (1) The inquiry committee contacted telephonically to Mst. Sherbano (Head Teacher) GGPS Lonia Basi Khail, Chowkidar of the concerned school and local inhabitants/parents who were asked to appear before the committee on 11-03-2013. They appeared before the committee on the date fixed the questionnaire was served to Head teacher sherbano who submitted her reply in written .The statement of the chowkidar and local inhabitants were also obtained/recorded. (copies of questionnaire & Reply of Mst Sherbano, statement of chowkidar & statement of local are attached as Annex D-1 to D-4)
 - (2) Mst Safia Bibi Ex-PST was also contacted telephonically & through Registered letter No 1717 dated 08-03-2013 to appear before the said committee on 12-03-2013 at 10:00 am but who appeared on 14-03-2013 at GCMS (Boys) Mansehra . A questionnaire was served to the said teacher who submitted her written reply. (copies of questionnaire & reply is attached as Annex E-1 to E-2)
 - (3) The then DDO (F) KD Mst Rashida Begum presently serving as SDEO (F) Mansehra was also contacted regarding the matter who submitted her written statement. (copy of her statement is attached as Annex "F")

FINDINGS:

The inquiry committee investigated the record provided by the office of DEO (F) Torghar, reply of the Head Teacher Sherbano, statements of chowkidar, & local inhabitants the following facts have been observed/noted.

- (1) As per attendance register provided by the office of DEO(F) Torghar / Head Teacher sherbano which is duly signed by ADO(E&SE) Torghar named Mushtaq Ahmad ,Bahadar Khan Marwat former EDO(E &SE) Torghar ,Ehsan-ullah, mentor teacher Zahidullah and EDO(E & SE) Torghar Mr. Sahibzada Hamid Mehmood during their visit on different dates. It has been noted that Mst Safia is absent from duty since 18-11-2009.

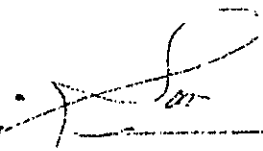
(85)

Secondly in the fake register the signature of the Sherbano is different than the register provided by the office of the DEO (F) Torghar and other staff of GGPS Lonia. Mst Sherbano has straightaway denied the signature put in the fake register and declared it as bogus /fake.

It is also pertinent to mention here that the pay of Mst Safia bibi has been stopped in the past and released without any justification/inquiry and an amount of Rs 74178/- has been paid vide No 404 dated 16-04-2011 similarly pay & allowances paid for absent period which is unlawful for which DDO(F) concerned is responsible.

RECOMMENDATIONS: In the light of all the relevant record & evidences/facts discussed above, the committee is of the view/opinion that the order passed by EDO (E&SE) Torghar vide notification No 2031 dated 18-09-2012 regarding the removal from service of Mst Safia Bibi is based on facts and valid. In compliance with the judgment of the Peshawar High court Abbottabad Bench dated 17-01-2013 the teacher concerned may be informed accordingly alongwith her removal order dated 18-09-2012 which was concealed by her from the Honorable court in writ petition No 752/2012 as referred by the honorable court in its judgment dated 17-01-2013.


INQUIRY COMMITTEE.

(1) 
SHAHZADA KHAN
PRINCIPAL Govt Centennial
Model School (boys) Mansehra

(2) 
KHAN AFSAR
Dy: DEO (F) Torghar

MOST IMPORTANT/MOST IMMEDIATE

Ammer D.

	GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
	Block "A" Civil Secretariat, Peshawar. Phone No. 091-9211128

Dated Peshawar the 18-01-2021

NOTIFICATION

W.P#752-A/2012 SAFIA BIBI D/O SYED NABI SHAH VS GOVT OF KP.

WHEREAS Safia Bibi D/O Syed Nabi Shah filed a Writ Petition (W.P) No. 752-A/2012 before Peshawar High Court, Abbottabad Bench, with the prayer "The impugned showcase notice may graciously be ordered to be set-aside and Petitioner may kindly order to be restored to her post and her salaries of six months may also be ordered to be paid forthwith".

AND WHEREAS the Honorable Peshawar High Court, Abbottabad Bench disposed of the subject Writ Petition with the direction, that "We would not like to dilate upon merits of the case and feel it appropriate to send the petition by treating it as a representation to the Respondent No. 01 for the redressed of her grievances. The Respondent No. 01 is directed to probe into the matter and then pass appropriate order and if the grievances of Petitioner is not redressed then she be informed accordingly".

AND WHEREAS In compliance to the Honorable Court directions, vide order dated 25-02-2013 Mr. Shahzada Khan Principal GHS No.02 Mansehra and Deputy District Education Officer (F) Torghar has been nominated as an inquiry Officers to probe into the allegations level against the Petitioner


AND WHEREAS the inquiry committee examined & inquired the case and recommended as, "In the light of all the relevant record and evidence/facts discussed above, the committee is of the view/opinion that the order passed by EDO (E&SE) Torghar vide notification No. 2031 dated 18-09-2012 regarding the removal from service of Mst. Safia Bibi is based on facts and valid".

Now THEREFORE, after due consideration of all the points raised by the inquiry officers in their inquiry report, in the light of the facts, rules and policies in vogue the Competent Authority has found no merit in the instant case, which is accordingly regretted.

**SECRETARY
ELEMENTARY & SECONDARY EDUCATION, DEPARTMENT**

Copies

1. Additional Registrar Peshawar High Court, Abbottabad Bench.
2. P.S to Secretary Elementary & Secondary Education, Department.
3. P.A to Deputy Secretary (Legal).
4. SO(Primary) Elementary & Secondary Education, Department.
5. Petitioner Safia Bibi D/O Syed Nabi Shah EX-PST Village Koza Banda Tehsil & District Battagram.


SECTION OFFICER (PRIMARY)

ساز دفتر پرنسپل گورنمنٹ ہائی سکول بڑو مانہرہ - 03005642678

مرسلہ نمبر: 1717

تاریخ: 08-03-2013

عنوان: اطلاع برائے انوائری

سہات صفیہ بی بی دختر سید نبی شاہ سکنہ محوزہ بانڈہ ضلع بگرام آپ کو مطلع کیا جاتا ہے کہ زیر دستخط نوآپ کے کیس میں بحوالہ نوٹیفیکیشن نمبر ENQ/701987/4-4/ENQ/SED/10 مورخہ 25/2/2013 سیکریٹری ایگریکولچر اینڈ سیکنڈری ایجوکیشن خیرپختون خواہ کی جانب سے انوائری آفیسر مقرر کیا ہے۔ یہ کہ آپ کو ڈسٹرکٹ ایجوکیشن آفیسر تو بڑو مانہرہ سے برطرف کیا گیا ہے۔ آپ نے اس آرڈر کے خلاف ہائی کورٹ ایبٹ آباد نیچ میں رٹ دائر کی۔ جس کے سلسلے حکم تعلیم نے آپ کے کیس میں انوائری کے احکامات جاری کیے ہیں۔ یہ کہ بڑو مانہرہ ٹیلیفون نمبر 03449522114 آپ کے ~~کیس~~ سید قیوم شاہ کو مطلع کیا گیا کہ مورخہ 09/03/2013 بوقت 10 بجے گورنمنٹ ہائی سکول بڑو مانہرہ میں آپ کے ہمراہ حاضر ہونے کی ہدایت کی مگر آپ کے ~~حاضر ہونے سے انکار کر دیا۔~~

اب آپ کو ایک بار پھر تحریری طور پر ہدایت کی جاتی ہے کہ مورخہ 12/03/2013 بوقت 10 بجے گورنمنٹ ہائی سکول بڑو مانہرہ میں اپنے دفاع میں پیشی کیے جانے کے لئے رگیا رگیا رگیا ~~حاضر ہوں۔~~ لہذا رٹ دیگر آپ کے خلاف یکطرفہ فیصلہ سمیا جائے گا۔

انوائری آفیسر
شہزادہ خان
پرنسپل گورنمنٹ ہائی سکول

PRINCIPAL
Govt. Centennial Model
School (Boys) Mansehra

Attested
A. F. Sultana
BATTAGRAM



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)1-25 /Torghar /2013
Dated Peshawar the 03-06-2013.

To

The District Education Officer (Female),
Torghar.

Subject:-

INQUIRY REPORT IN R/O MST. SAFIA BIBI EX-PST GGPS LONIA BASI
KHAIL DISTRICT TORGHAR

I am directed to enclose herewith a copy of letter No SO (AB) ESSED/
4-4/ENQ:/Torghar/12 dated 30-05-2013 along with its enclosure received from Section
Officer (AB) Elementary & Secondary Education Department in r/o Ms.Safia Bibi Ex-PST
GGPS Lonia Basi Khail District Torghar for further necessary action as per rules/policy.

Enclos above.

(HINA SAIED)
SECTION OFFICER (PRIMARY)

3/6/13