

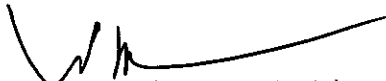
20.01.2021

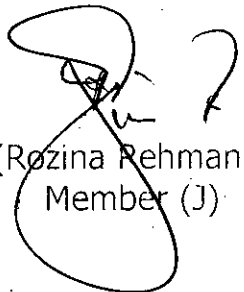
Appellant present through counsel.

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)

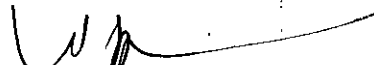
  
(Rozina Rehman)  
Member (J)


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

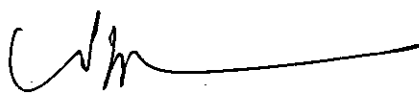
Due to summer vacations case to come up for the same on ~~25.08~~.2020 before D.B.

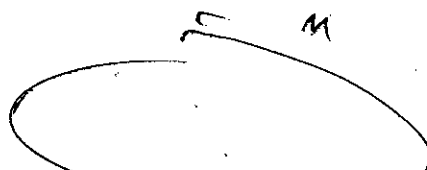
  
Reader

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

06.09.2019 Court of Counsel for the appellant present.

Case No.- 1015/2019

Contends that through notification dated 04.04.2019 the

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	respondent No. 2/Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar "disowned" the appointment/
1-	02/08/2019	adjustment notification of the appellant ostensibly on the ground that at the time of 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.
2-		<p>The appeal of Mst. Ghazala presented today by Mr. Anwar-Behman 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 05/09/19</p> <p style="text-align: right;">CHAIRMAN</p> <p style="text-align: right;">Chairman</p>

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

Service Appeal No. 1015/2019

Mst. Ghazala .....Appellant

....VERSUS....

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

**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"	10-13
7.	Advertisement dated: 26.01.2009	"D"	14-18
8.	Appointment Notification dated: 31.12.2012 alongwith Medical Certificate dated: 16.01.2013	"E"	19-21
9.	Adjustment order dated: 16.04.2013 alongwith charge report dated: 03.05.2013	"F"	22-23
10.	Impugned Notification dated: 05.04.2019	"G"	24
11.	Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number	"H"	25-26
12.	Wakalatnama		27

  
Ghazala  
Appellant

Through

Amin ur Rehman Yusufzai

  
Sajjad Mensud

&

  
Khalid Khan

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

Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

①

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

Service Appeal No. 1015/2019

Mst. Ghazala D/O Ikram Uddin, Ex-SST (Gen),  
R/o Mohalla Malakanano Kelli, village Jamal Ghari, Tehsil & District Mardan.

**Appellant**

....VERSUS....

Diary No. 1128

Dated 02/8/2019

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.5797-801, DATED: 05.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 31.12.2012 ALONGWITH ADJUSTMENT ORDER DATED: 16.04.2013, 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  
2/8/19

**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 2009, from University of Peshawar and having passed PTC & B.Ed Degree courses from Govt Elementary College (F) Dargai & 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.7387-94/File No.2/A-14/SST(F)Gen/PSC/Apptt: dated: 31.12.2012.  
**(Copy of appointment Notification dated: 31.12.2012 alongwith Medical Certificate dated: 16.01.2013, is attached as Annexure "E")**
5. That appellant was subsequently adjusted in Govt Girls Middle School, Lal Mela, Tribal District Orakzai i.e. against vacant Post, vide Order dated: 16.04.2013  
**(Copy of Adjustment order dated: 16.04.2013 alongwith charge report dated: 03.05.2013, 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.  
**(Copies 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:

**GROUND 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 appellant 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.

*Ghazala*  
Appellant

Through

Amin ur Rehman Yusufzai

*(Signature)*

Sajjad Mehsud

&

*(Signature)*

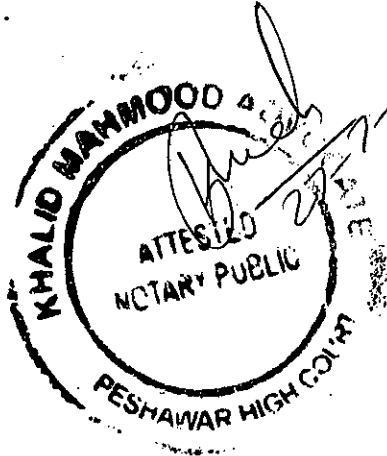
Khalid Khan

Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

**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.



*Ghazala*  
Deponent

5

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

C.M No.\_\_\_\_/2019

In

Service Appeal No.\_\_\_\_/2019

Mst. Ghazala .....Appellant

.....VERSUS.....

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

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

Respectfully Sheweth:-

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.

*Ghazala*  
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: 29.07.2019

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

C.M No.\_\_\_\_/2019  
In  
Service Appeal No.\_\_\_\_/2019

Mst. Ghazala .....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others .....Respondents

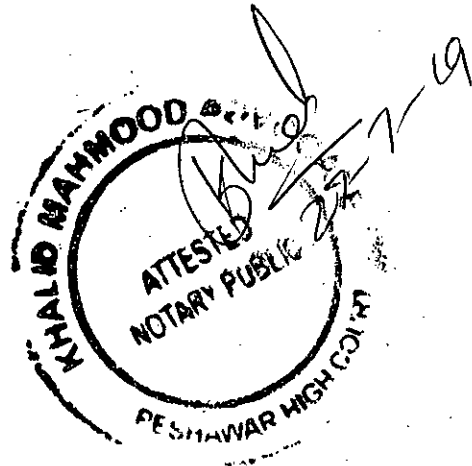
**AFFIDAVIT**

I, Mst. Ghazala D/O Ikram Uddin, Ex-SST (Gen), R/o Mohalla Malakanano Kelli, village Jamal Ghari, Tehsil & 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.

Identified By:

*Ghazala*  
DEPONENT  
CNIC #: 16101-3368903-4

**Amin-ur-Rehman Yusufza**  
Advocate, Peshawar





①

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

Service Appeal No.\_\_\_\_/2019

Mst. Ghazala..... **Appellant**

....**V E R S U S**....

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

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Mst. Ghazala D/O Ikram Uddin, Ex-SST (Gen),  
R/o Mohalla Malakanano Kelli, village Jamal Ghari, Tehsil & 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

*Ghazala*  
Appellant

Through

**Amin ur Rehman Yusufzai**

**Sajjad Mensud**

&

**Khalid Khan**

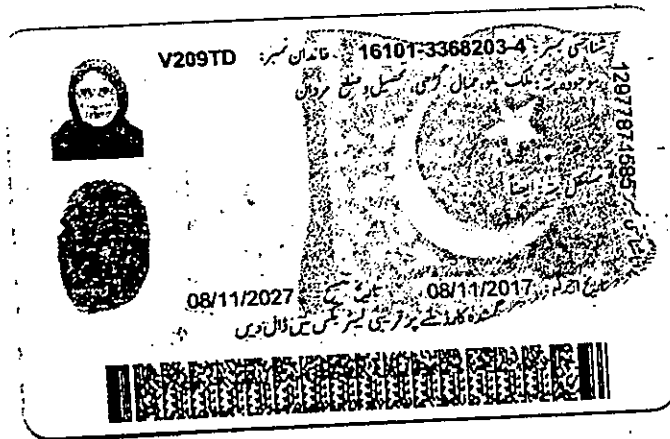
Advocates, Peshawar,  
3-A, Park Avenue, Bhattani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

ANNEX A<sup>4</sup>

(8)



~~ATTESTED~~

# CURRICULUM VITAE

ANNEX 'B'  
9

## GHAZALA

Mohallah Malakanano Killi Village Jamal Garhi  
Tehsil & District Mardan, KPK Pakistan  
Cell # 0092-342-0971635

### Objectives:

To seek a challenging job using my work experience and qualification. I am looking for an opportunity that would help me in build up my skill and enjoy my growth. I am confident that I will be able to fulfill my duties in conformity to requirement of the organization.

### Personal Information

Father's Name : Ikram Ud Din  
Date of Birth : 14-03-1977  
Date of Appt : 16-04-2013 (SST)  
CNIC : 16101-3368203-4  
Religion : Islam  
Nationality : Pakistani  
Marital Status : Single  
Domicile : Mohmand Agency  
Gender : Female

### Academic Career

DEGREE/CERTIFICATE	MARKS/TOTAL	BOARD/UNIVERSITY
S.S.C	464/850	BISE Peshawar
F.A	504/1100	BISE Peshawar
B.A	280/550	University of Peshawar
M.A (Pashto)	610/1100	University of Peshawar
M.A (Urdu)	501/1100	AWKU Mardan

### Professional Career

DEGREE/CERTIFICATE	MARKS/TOTAL	BOARD/UNIVERSITY
B.Ed	582/900	AIOU Islamabad
P.T.C	780/1200	Govt Elementary College (F) Dargai

### Experience

- ◆ 08 Years Teaching experience as a "SST (G)" at GGMS Zarif Khan Dheri Katlang

### Languages

- ◆ English, Urdu & Pashto.

### Hobbies

- ◆ Reading News Paper, Books.

Annex 204  
10

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 334896

## PROVISIONAL RESULT CARD

Name: GHAZALA  
 Father's Name: IRAM UD DIN  
 Address: VILL & P/O JAMAL GARHI, MOH:  
 MALIK PALO

Roll No. AE616661  
 Registration No. 07NMD3224  
 Final Semester AUTUMN 2008

Tehsil: MARDAN  
 District: MARDAN

has successfully completed BACHELOR OF EDUCATION (B.ED)

The detailed of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 08	0518	EDUCATIONLA PSYCHOLOGY & CURRICULUM	100	68
AUT- 08	0651	ENGLISH (COMPULSORY	100	53
AUT- 08	0514	EVALUATION, GUIDANCE 7 RESEARCH	100	69
AUT- 08	0513	SCHOOL ORGANIZATION	100	63
SPR- 09	0654	TEACHING OF ISLAMIAT	100	65
SPR- 09	0517	TEACHING OF PAKSITAN STUDIES	100	64
AUT- 09	0655	WORKSHOP & TEACHING PRACTICE	100	79
AUT- 09	0512	PERSPECTIVES OF EDUCATION	100	68
AUT- 09	0652	ISLAM, PAKSITAN AND MODERN WORLD	100	61

**CREDIT** 6  
 Result Declared on July 18, 2009  
 Date of Issue Sep 29, 2009

Total Marks / Obtained 900 / 582  
 Percentage / Grade 65 B

**ATTESTED**   
 Controller of Examinations

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

Roll No. 11228  
 CHAYLA  
 IRAN UD DIN  
 VILL & PWD JAMAL SARH MOH  
 MALIK PALO  
 FARIDAN  
 FARIDAN  
 District: FARIDAN  
 City: FARIDAN  
 has successfully completed

**BACHELOR OF EDUCATION (B.ED)**

Roll No. 11228  
 CHAYLA  
 IRAN UD DIN  
 VILL & PWD JAMAL SARH MOH  
 MALIK PALO  
 FARIDAN  
 FARIDAN  
 District: FARIDAN  
 City: FARIDAN  
 has successfully completed

The details of passed courses are as under:

Sl. No.	Course Code	Title of Course	Grade	Year
01	6210	EDUCATIONAL PSYCHOLOGY & CURRICULUM	B	1998
02	6221	ENGLISH (COMPELLORY)	B	1998
03	6214	EVALUATION, GUIDANCE & RESEARCH	B	1998
04	6213	SCHOOL ORGANISATION	B	1998
05	6224	TEACHING OF ISLAMIC	B	1998
06	6215	TEACHING OF PAKISTAN STUDIES	B	1998
07	6222	WORKSHOP & TEACHING PRACTICE	B	1998
08	6212	PERCEPTIVES OF EDUCATION	B	1998
09	6223	ISLAM, PAKISTAN AND MODERN WORLD	B	1998

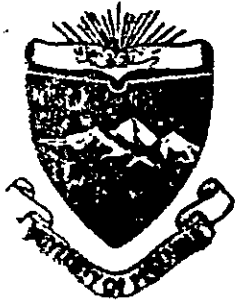
Total Marks Obtained: 210 / 210  
 Percentage: 100%  
 Date: 17/11/2008  
 Signature: \_\_\_\_\_  
 Controller of Examinations

CREDIT  
 17/11/2008  
 Signature: \_\_\_\_\_  
 Controller of Examinations

No 0032551

# University of Peshawar

(11)



## Position Detailed Marks Certificate

Master of Arts in Pashto

Final

Annual Examination 2009

Mardan



Name: **GHAZALA**

Gender: *Female*

Roll No: 28823

Father's Name: **IKRAM UDDIN**

Registration No: 2001-PC-446

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Modren Poetry-VI	100	40	Forty Only
Modren Prose-VII	100	76	Seventy Six
Detail Study of Khushal-VIII	100	53	Fifty Three
Critical Literature Rhetoric-IX	100	55	Fifty Five
Essay-X	100	57	Fifty Seven
Viva Voçe	100	60	Sixty Only
<b>Previous</b>	<b>500</b>	<b>269</b>	<b>Two Hundred and Sixty Nine</b>
<b>Final</b>	<b>1100</b>	<b>610</b>	<b>Six Hundred and Ten</b>

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken In Parts

Examination held From 24-Jul-2009 to 20-Aug-2009

Result Declared on Thursday, January 28, 2010

Issue Date: 29-Jan-2010

9:06 am

(Dr. Mohammad Shafi)

ADDITIONAL CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

Prepared by Computer Cell

Computerized by RTC

**ATTESTED**

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بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# University of Peshawar (Pakistan)

Session ANNUAL 2003

GHAZALA

XXXXX

Son / Daughter of

IRAMUD DIN

DISTRICT MARDAN

and a student/private candidate of

having passed the Prescribed examination held in

JUNE 2003

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

## Bachelor of Arts

in SECOND Division

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

Serial No. 0120124

Registration No. 2000-PC-4460

Roll No. 98395

Result declared on 3RD MAY 2007



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*[Signature]*  
Registrar

Countersigned  
*[Signature]*  
Vice-Chancellor

S.No. 56448

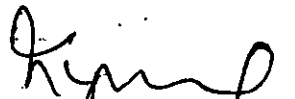
Roll No. 8597

Group. Humanities



**Board of Intermediate and Secondary Education**  
**Peshawar N.W.F.P. Pakistan**  
**INTERMEDIATE EXAMINATION**  
**SESSION 1999-SUPPLEMENTARY**

This is to Certify that Ghazala Daughter of Ikram Uddin  
and a resident of Mardan District Registered No. 130-B/GM-95  
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar  
held in December, 1999 as a Private Candidate. She obtained 504 Marks out of 1100  
and has been placed in Grade D Representing Fair. She has been awarded Grade - on the  
basis of internal assessment by the institution concerned. The Examination was taken in private

  
Asstt. Secretary

  
Secretary

ATTESTED



## NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

14

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) 2<sup>nd</sup> 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) 1<sup>st</sup> 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:** 2<sup>nd</sup> 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 Phisic, 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 Phisic, 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 Phisic, 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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(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 Inistiture.**

**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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(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

1. 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.
2. 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.

- (i) 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 uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Manshara 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.
- (ii) 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.
- (iii) 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.
- (iv) 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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- (18)
- (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 Mansehra.
- 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**

**ATTESTED**

**(Atta Ur Rehman)**

**Secretary**

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



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936  
E-mail [desekpk@yahoo.com](mailto:desekpk@yahoo.com)

19

### 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 General) 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 his Services placed at the disposal of Director Education FATA for further posting against vacant SST Genral posts:-

S. #	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1.	Shabeena Naz	Noor Hassan	Mohmand Agency	1	Village Metai Dara Tehsil Upper Mohmand Distt: Mohmand Agency	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.
2.	Ghazala	Ikram Ud Din	Mohmand Agency	1	Vill Malak Palo Jamal Garhi Distt: & Tehsil Mardan	.....Do.....

#### **Terms and conditions:-**

- 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.
- In case, she is already in Government: service and working against pensionable post on regular basis before 1<sup>st</sup> 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.
- 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 there post within one month of issuance of this notification her appointment will expire automatically and no subsequent appeal etc shall be entertained.
- She would be on probation for a period of one year extendable for another one year.

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Appointment Order No.45 SST(G) FATA Adut No.1/2009

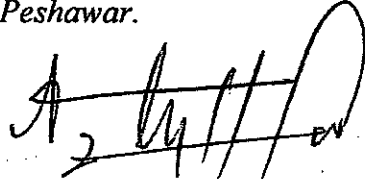
- 7. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
- 8. Charge report should be submitted to all concerned
- 9. The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
- 10. The DEO(F) 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 his duty.

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

Endst: No. 7387-94 /File No.2/A-14/SST(F) Gen/PSC/Apptt: Dated Peshawar the 31-12/2012

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 Officers 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: Directoress (Estab)**  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar  
 31/12

  
**ATTESTED**

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MEDICAL CERTIFICATE

Name of Official Mst. Ghazala  
 Caste or race Mohmand  
 Father's name Iqbaluddin  
 Residence vill. Jamal Goshi Teh P DIST.  
Mardan  
 Date of birth 14-03-1977  
 Exact height by measurement 5-3  
 Personal mark of identification NK  
 Signature of the Official Ghazal  
 Signature of head office

Seal of Office

I do hereby certify that I have examined Mst. Ghazala SSI candidate for  
 employment in the Office of the Education Department SSI(G)  
 and can not discover that he had any disease communicable or other constitutional affection or bodily  
 infirmity except NK

I do not consider this as disqualification for employment in the office of the NK  
 His age according to his own statement 35 year and by  
 appearance about 35 years.

[Signature]  
 Secretary  
 Standing Medical Board  
 Police Service Hospital  
 Peshawar

[Signature]  
 Medical Superintendent  
 Standing Medical Board  
 Police Service Hospital  
 Peshawar  
 16/1/13  
 MEDICAL SUPERINTENDENT,

Civil Hospital

LEFT HAND THUMB AND FINGER

IMPRESSION [Signature]

[Signature]  
 Physician  
 Standing Medical Board  
 Police Service Hospital  
 Peshawar  
 16/01/13

ATTESTED





Annex F

22

**ADJUSTMENT**

Consequent upon their appointment as SST (General) in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 7387-94/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 31-12-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect: -

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Shabeena Naz D/o Noor Hassan (Mohmand) Village Metai Dara Tehsil Upper Mohmand Distt: Mohmand Agency	GGMS Ainposh Orakzai Agency	Against vacant post
2	Ghazala D/o Ikram-ud-Din (Mohmand) Vill Malak Palo Jamal Garhi Distt: & Tehsil Mardan.	GGMS Lal Mela Orakzai Agency	Against vacant post

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. However the Agency Education Officer concerned will verify their documents before release of pay.

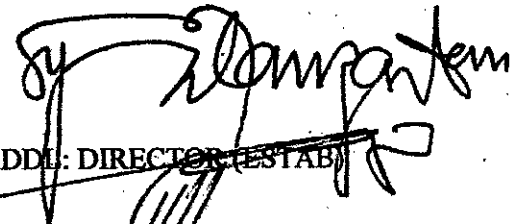
(ROZ WALI KHAN)

DIRECTOR EDUCATION (FATA)

Endst: No. 6134-38 A-1/ Apptt: of SST (General) (PSC) 2013 Dated Pesh: the 16-4-2013

Copy forwarded to the: -

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar  
w/r to his Notification cited above.
- 2 Agency Education Officer Orakzai Agency.
- 3 Agency Account Officer Orakzai Agency
- 4 Candidate Concerned
- 5 P.A to-Director Education FATA

  
ADDL: DIRECTOR (ESTAB)

**ATTESTED**



**ADJUSTMENT**

Consequent upon their appointment as SST (General) in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Director Education, FATA vide Director Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 1387-94/116 No. 2A-14221(FV)G-PS/C Appnt dated 31-12-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:-

S#	Name of Applicant/Address	Posted at	Remarks
1	Shabeena Niaz D/o Noor Hassan (Mohmand) Village Metan Dera Tehsil Upper Mohmand Distt. Mohmand Agency	GCMS Airosh Orakzai Agency	Against vacant post
2	Ghazala D/o Irtaza-Um (Mohmand) Vill. Alask Fero Jansai Gdhi Dera & Tehsil M. Dera	GCMS Tal Metan Orakzai Agency	Against vacant post

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, Ferozpur. However the Agency Education Officer concerned will verify their documents before release of pay.

FATA No. 1387-94/116 No. 2A-14221(FV)G-PS/C Appnt of SST (General) (PSC) 2013 Dated Ferozpur the 31-12-2012  
DIR. OF EDUCATION (FATA)  
ROU WAI KHAN

Copy forwarded to:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2 w/o to the Notification cited above.
- 3 Agency Education Officer Orakzai Agency
- 4 Agency Account Officer Orakzai Agency
- 5 Candidates Concerned
- 6 P.A. to Director Education FATA

ADCL. DIR. (FATA)

# Charge Report.

(23)

I Mst Chayla SSI(S) took over charge of my post at GGMS Lalmela Orakzai Agency to day on 03-05-2013 P/N Under Director of Edu: PATA NO 6134-38 dated 16-04-2013 and K.P.K Director of Education NO 7387-94 dated 31-12-2012.

Report is submitted for further impact please

VACANT.

Signature of Relieved  
officer.

Signature of Relieving  
officer.

*Chayla SSI*

Chayla SSI

Attested

*Poolba*  
HEADMISTRESS  
GGMS Lalmela  
Orakzai Agency

ATTESTED

ANNEX 'G'  
94

Substituted by even No & date:



DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA

**NOTIFICATION**

1. WHERE AS: one Mst. Ghazala D/O Ikram Ud Din Khan who herself appointed as SST (G) in GGMS Zarif Khan Dairi Mardan Settle Side vide appointment Notification No. 7387-94 dated 31/12/2012 which was not issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, hence fake and bogus.
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 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. Ghazala D/O Ikram Ud Din, having no legal status of the said appointment 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 Notification No. 7387-94 dated 31/12/2012 is hereby declared as fake/bogus ab initio and subsequently "disowned" with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Ghazala D/O Ikram Ud Din in the interest of Public Service.

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 5797-801 dated 05/04/2019

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 Orakzai.
2. District Education Officer Tribal District Orakzai with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer Tribal District Orakzai 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.
6. Principal/Head Mistress concerned.

ATTESTED

Deputy Director (Estab)  
Merged Districts

## بھجور جناب سیکرٹری E&SE ڈیپارٹمنٹ KP پشاور

محکمہ اہل بر خلاف نوٹیفیکیشن محررہ 04-04-2019 جس کی رو سے ڈائریکٹر صاحب E&SE کے ڈیپارٹمنٹ KP پشاور نے Applicant کے بھرتی کے احکامات بحیثیت SST محررہ 31-12-12 کو یکطرفہ طور پر جعلی و فرضی بتلا کر Applicant کو ملازم ماننے سے انکار کر دیا۔ استدعا نوٹیفیکیشن محررہ 04-04-2019 مجازیہ جناب ڈائریکٹر صاحب E&SE ڈیپارٹمنٹ KP پشاور کو کالعدم کر کے Applicant کو ملازمت پر تمام مراعات کے ساتھ بحال کیا جائے۔

جناب عالی!

- 1- یہ کہ Applicant ضلع مہمند کا پیداہی باشندہ ہے۔
- 2- یہ کہ Applicant، M.A, B.Ed تک تعلیم یافتہ ہے۔
- 3- یہ کہ محکمہ E&SE ڈیپارٹمنٹ KP پشاور نے بذریعہ اشتہار محررہ 2009 مجازیہ KPPSC میں صوبہ سرحد (اب KP) کے اہل امیدواروں سے SST کی پوسٹوں کیلئے درخواستیں طلب کیے۔ چونکہ Applicant تمام شرائط پر پورا اتر رہا تھا۔ اسلئے بذریعہ Through Proper Channel اپلائی کی۔
- 4- یہ کہ بھرتی کے مروجہ طریقہ کار سے نکلنے ہوئے Applicant میرٹ لسٹ میں جگہ بنانے میں کامیاب ہوا۔
- 5- یہ کہ Applicant کو KPPSC میں باقاعدہ E&SE ڈیپارٹمنٹ KP پشاور کو منظور کیا جو کہ محکمہ نے بذریعہ نوٹیفیکیشن محررہ 31-12-12 تعیناتی کے احکامات جاری کر کے بعد از روئے حکم محررہ 31-12-2012 تعیناتی کے احکامات جاری کر کے بعد از روئے حکم محررہ 31-12-12 ٹرانزائل ڈسٹرکٹ اور کزنٹی میں پرکام کر رہی ہوں تقریباً 8 سال سے۔
- 6- یہ کہ بغیر چارج شیٹ اور شوکا زونٹس و پرسنل ہیمبرنگ اور ریگولر انکوائری کے Applicant کی طرفہ احکامات محررہ 04-04-2019 کی رو سے نوکری سے برخاست کیا گیا۔ بلکہ بھرتی احکامات کو جعلی و فرضی گردانہ کیا جو کہ ظلم اور نا انصافی کا منہ بولتا ثبوت ہے۔ اس لیے قابل منسوخی ہے۔
- 7- یہ کہ Applicant کے 8 سال سے زیادہ عرصہ ملازمت کو بہ یک جنبش قلم ختم کر کے نہ صرف گھر بھیج دیا گیا بلکہ دو روز ملازمت کی تمام تنخواہیں واپس لی جانے کے احکامات جاری کیے گئے جو کہ آئین اور قانون کے منافی ہے۔

لہذا التماس ہے کہ بمظوری درخواست ہذا نوٹیفیکیشن محررہ 04-04-20؛ 9 کو کالعدم کر کے Applicant ملازمت پر بحال کیا جائے۔

آپ کی مخلصہ

غزالہ ایس ایس ٹی جنرل

مورخہ: 16-04-2019

ATTESTED

اسماء کنیزان

- 1- (1) عتیقہ بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 2- (2) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 3- (3) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 4- (4) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 5- (5) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 6- (6) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 7- (7) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 8- (8) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 9- (9) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 10- (10) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 11- (11) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 12- (12) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم

- 13- (13) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 14- (14) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 15- (15) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 16- (16) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 17- (17) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 18- (18) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 19- (19) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 20- (20) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 21- (21) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 22- (22) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 23- (23) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 24- (24) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 25- (25) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 26- (26) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 27- (27) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم
- 28- (28) بیگم بیگم - ۹۸۳۵ - بیگم بیگم - بیگم بیگم



ATTESTED

بعدالت دیکر منظور ہو گا  
صاحب منظور  
نام گورنمنٹ

مجاہد  
دعویٰ اجرم سروس ریسٹ

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 و کیل 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 مظر حاضر نہ ہو 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 مظر 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 پرداخت صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و دگرانی 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 کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر 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 فیس 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 ایات اور ایسی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

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

Sajjad Ahmad Mehsud  
Advocate High Court  
Peshawar

Sajjad  
Khalid Khan  
Advocate

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

Service Appeal No. 1015/2019

Mst. Ghazala.....Appellant

**VERSUS**

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

**I N D E X**

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Parawise Comments of the Commission		1-3
2.	Copy of PSC Advertisement 01/2009	"A"	4
3.	Copy of PSC Merit list	"B"	5-15
4.	Copy of Authority Letter		16

UMS88642532



Senior Law Officer  
Khyber Pakhtunkhwa  
Public Service Commission Peshawar

UMS No.  
88642532  
Date. 05/06/2020



1

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

Service Appeal No. 1015/2019

Mst. Ghazala.....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).

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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 concerned 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.

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

*Shahin*

3

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

*F2 M Juss*  
CHAIRMAN  
KHYBER PAKHTUNKHWA  
PUBLIC SERVICE COMMISSION  
PESHAWAR  
(RESPONDENT NO.03)

4

Annex-A<sup>5</sup>**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.**

**(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

R-SBT (S) Annex-B

## MERIT LIST of female SST (Suzanne)

S. No	Total Marks	Interview Marks	D/O Birth	Name with Father's Name	District	
1.	71	46	16/9/81	Sajma Raqib D/O Raqib Baz Khan	Bannu/4	M
2.	70	46	17/11/85	Malghalarah D/O Mahboob ur Rahman	Karak/4	M 15/9
3.	69	46	25/2/83	Rafia Tareen D/O Munir Ahmad Tareen	D.I Khan/4	M 21/9
4.	69	46	12/4/83	Afshan Ali D/O Muhammad Ali	Karak/4	M 13/9
5.	69	45	7/12/78	Safia Jabeen D/O Haris Maqbool Khan	D.I Khan/4	
6.	69	45	30/3/80	Zakia Mehboob D/O Mian Mehboob Ullah	Nowshera/2	x 11
7.	69	45	4/5/83	Fatima Anwar D/O Muhammad Anwar	D.I Khan/4	M 22/9
8.	69	45	7/4/84	Nasima Akhtar D/O Umer Khan	Tank/4	M
9.	68	46	22/8/81	Sajida Syed D/O Kachkol Shah	Kohat/4	
10.	68	46	14/3/84	Nabeela D/O Sarfaraz Khan	Swabi/2	x 12
11.	68	46	8/9/85	Nabeela Gul D/O Faizullah Khan	Kohat/4	M 15/9
12.	68	45	9/10/81	Nazia Nasreen D/O Zuriat Khan	Karak/4	M 20/9
13.	68	45	5/11/33	Sahira Fatima D/O Muhammad Usman	Karak/4	M 22/9
14.	68	45	1/5/84	Sumera Abdus Sattar D/O Adus Sattar	D.I Khan/4	
15.	68	44	18/9/83	Irum Nigah D/O Nizab Hussain	Peshawar/2	x 13
16.	67	45	20/2/80	Safia Zaman D/O Muhammad Zaman Khan	D.I Khan/4	M
17.	67	45	16/5/83	Jameela Bano D/O Muhammad Aslam Azad	Lakki Marwat/4	
18.	67	45	10/4/84	Salma Mehnaz D/O Rahmat Ali Khan	Karak/4	M
19.	67	45	19/5/84	Nadla Begum D/O Kamli Khan	Kohat/4	M 15/9
20.	67	45	27/4/85	Nasrah Rubah D/O Zawar Hussain	D.I Khan/4	
21.	67	45	10/8/85	Misra Riya Bibi D/O Attaullah Khan	D.I Khan/4	M
22.	67	44	1/4/84	Shahnaz Gul D/O Musafir Gul	Peshawar/2	4
23.	67	44	15/6/84	Sadla Ibad D/O Ibadullah	Nowshera/2	5
24.	67	44	5/1/85	Shalsta Khan D/O Farhad Khan	Mardan/2	6
25.	66	46	13/11/71	Syeda Saima Anjum D/O Syed Hashim Ali Shah	Bannu/4	M
26.	66	45	31/3/81	Shahla Gul Siddiqi D/O Muhammad Javed Siddiqi	Nowshera/2	7
27.	66	45	23/11/81	Sanebar Khan D/O Sohrab Khan	Kohat/4	M 22/9
28.	66	45	10/3/86	Nazla Qayyum D/O Abdil Qayyum	D.I Khan/4	20/9
29.	66	44	17/5/78	Mehreen Fida D/O Fida Muhammad	Peshawar/2	8
30.	66	44	11/4/83	Iram Khan D/O Sher Dil Khan	Swabi/2	9
31.	66	44	4/10/83	Beenish Gul Bangash D/O Naseer Ahmad Bangash	Kohat/4	M
32.	66	44	10/10/84	Tabassum Rana D/O Aftab Khan	Bannu/4	
33.	66	44	1/5/85	Tahira Javed Malik D/O Malik Javed Hussain	D.I Khan/4	M

34.	66	44	28/3/86	Nazla Riaz D/O Muhammad Riaz Akhtar	Haripur/5
35.	66	43	4/1/84	Mamoon Gul D/O Ahmad Khan	Charsadda/2
36.	66	43	1/8/84	Rizwana Bibi D/O Sahib Jan	D.I Khan/4
37.	66	43	27/10/84	Farah Ayub D/O Muhammad Ayub Khan	FR Tank/1
38.	66	43	3/4/86	Sana Jamal D/O Hazrat Jamal	Mardan/2
39.	66	42	23/12/83	Shebana D/O Farhad	Swabi/2
40.	66	42	24/12/83	Saba Suleman D/O Muhammad Suleman	Haripur/5
41.	65	46	15/3/84	Sania Nizam D/O Nizam ud Din	Kohat/4
42.	65	46	16/2/86	Fatima D/O Abdul Nazeer	Swabi/2
43.	65	45	31/3/83	Shahida Mehreen D/O Fazal Haq	Karak/4
44.	65	45	13/4/84	Noshreen D/O Khanan Khan	Swabi/2
45.	65	44	1/3/79	Amlina Ramzan D/O Muhammad Ramzan	D.I Khan/4
46.	65	44	30/12/80	Rukhsana Gul D/O Gul Mar Khan	Lakki Marwat/4
47.	65	44	12/10/81	Sadja Anwar D/O Prof. Muhammad Anwar Khan	Charsadda/2
48.	65	44	15/3/82	Nusrat Begum D/O Mustafa Kamal	Khyber Agy/1
49.	65	44	14/4/85	Samreen Noor D/O Noor Muhammad	S.W Agy/1
50.	65	43	20/3/82	Shabnam Fatima D/O Ghulam Hassan	D.I Khan/4
51.	65	43	3/4/83	Nadia Noreen D/O Muhammad Sherin Khan	Charsadda/2
52.	65	43	17/4/85	Salma Kifayat D/O Kifayat Ullah	Mardan/2
53.	65	42	1/1/81	Taskeen Bibi D/O Shamas Khan	Swabi/2
54.	65	42	1/5/83	Maria Khatoon D/O Muhammad Niaz	Abbottabad/5
55.	65	42	10/5/83	Hajra Bibi D/O Fateh Hussain Shah	Haripur/5
56.	65	42	22/11/85	Irum Naz D/O Mukhtiar Khan	Mardan/2
57.	64	45	11/4/73	Latafat Bibi D/O Mushtaq Hussain Shah	D.I Khan/4
58.	64	45	20/2/82	Shamshad Bibi D/O Sultan Baksh	D.I Khan/4
59.	64	44	23/3/80	Umara Noshreen D/O Meher Zaman	Nowshera/2
60.	64	44	4/12/83	Farja Inayat D/O Inayat Ullah Khan	Charsadda/2
61.	64	44	1/11/86	Sajda Noorin D/O Abdul Wasoo	Lakki Marwat/4
62.	64	43	27/3/85	Salma D/O Zubair Shah	Mohmand Agy/1
63.	64	42	4/4/79	Naila Noreen D/O Muhammad Anwar	Peshawar/2
64.	64	42	28/8/83	Nazla Shahoon D/O Muhammad Miskeen	Mansohra/5
65.	64	42	14/4/85	Hadia Naz D/O Jan Muhammad	Mardan/2
66.	64	41	10/2/82	Naveeda Tariq D/O Malik Muhammad Tariq	Peshawar/2
67.	64	41	16/4/83	Nadia Malik D/O Abdul Malik	Mardan/2
68.	64	41	9/8/83	Huma Akram Khan D/O Akram Khan	Mardan/2
69.	64	41	21/3/85	Kalsoom Mumtaz D/O Mumtaz Hussain	Peshawar/2
70.	64	41	29/3/86	Arj Naseer D/O Muhammad Naseer Joya	D.I Khan/4

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71.	63	45	7/11/80	Safia Naz D/O Habib Ullah	Charsadda/2
72.	63	44	6/8/78	Noshaba Cocab D/O Hameed Ullah	D.I Khan/4
73.	63	44	10/2/86	Noureen Nazir D/O Nazir Muhammad	Charsadda/2
74.	63	43	27/4/78	Shafida Begum D/O Andaz Ali Khan	Bannu/4
75.	63	43	8/1/80	Nazla Begum D/O Wali Jan	Mardan/2
76.	63	43	8/9/82	Shumaila Hussain D/O Muhammad Hussain	Hangu/4
77.	63	43	25/9/82	Aasma Qureshi D/O M. Rehman	Lakki Marwat/4
78.	63	43	5/4/86	Nadla Nosheen D/O Ghulam Rasool	Bannu/4
79.	63	42	3/4/77	Safia Irshad D/O Muhammad Shabih U Hassan	Peshawar/2
80.	63	42	12/9/82	Lubna Saraj D/O Saraj Muhammad	Swabi/2
81.	63	42	13/9/82	Neelam Taj D/O Taj Muhammad	Dir Lower/3
82.	63	42	1/1/83	Sheraz Begum D/O Afraid Khan	Swat/3
83.	63	42	22/6/83	Aisha Bano D/O Muhammad Ashraf	Mansehra/5
84.	63	42	11/7/83	Zahida Sharif D/O Sahrif Ullah Khan	Bannu/4
85.	63	42	23/11/83	Razla Perveen D/O Hajit Bad Shah	Karak/4
86.	63	42	1/1/84	Sadia Bibi D/O Fazal Ghani	Dir Lower/3
87.	63	42	1/2/85	Robina Naz D/O Wasal Khan	Charsadda/2
88.	63	42	8/4/85	Tania Gul D/O Sher Dil Khan	Swabi/2
89.	63	42	5/9/85	Naseem Bano D/O Muhammad Ghulam	Kurram Agy/1
90.	63	42	30/6/83	Aqoola Bibi D/O Abdur Razaq	Abbottabad/5
91.	63	41	11/4/82	Farzana Bibi D/O Muhammad Jan	Tank/4
92.	63	41	28/2/83	Nuzhat Bibi D/O Abdul Malik	Swabi/2
93.	63	41	15/10/84	Nazla Tabassum D/O Muhammad Qasim	Mardan/2
94.	63	41	5/3/85	Kaleem Azam D/O Sher Azam Khan	Peshawar/2
95.	63	40	1/1/79	Nazra Shaheen D/O Shahzada Khan	Haripur/5
96.	63	40	9/8/83	Beena Akram Khan D/O Akram Khan	Mardan/2
97.	63	40	21/11/83	Farhat Naz D/O Aurang Zeb	Mansehra/5
98.	63	40	4/8/84	Mamoona Imtiaz D/O Malik Imtiaz Ahmad	Charsadda/2
99.	63	40	2/3/85	Fozia Amin D/O Muhammad Amin	Mardan/2
100.	63	40	8/8/85	Shahzina D/O Mahabat Khan	F.R Bannu/1
101.	63	40	1/11/85	Bushra Saleem D/O Muhammad Saleem	Haripur/5
102.	63	40	26/3/86	Irum Naz D/O Behram Khan	Mkd Agy/3
103.	62	43	21/9/78	Nagina Rehman D/O Gul Rehman	Peshawar/2
104.	62	42	29/1/85	Alla Bibi D/O Sher Ali	Swabi/2
105.	62	42	12/3/85	Asma Yaqoob D/O Muhammad Yaqoob	D.I Khan/4
106.	62	42	4/9/85	Mahwash Zahoor D/O	Mardan/2

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107.	62	42	30/11/85	Sarwat Iftikhar D/O Iftikhar Ahmad	Mansehra/5
108.	62	42	22/9/86	Amira Jadoon D/O Hamid Ali Khan	Abbottabad/5
109.	62	41	1/3/87	Shazia Naeem D/O Shaukat Ali	Swabi/2
110.	62	40	2/7/78	Rubina Shaheen D/O Manzoor	Haripur/5
111.	62	40	1/3/81	Saira Bano D/O Mira Khan	Mohmand Agy/1
112.	62	40	1/1/82	Hashmat D/O Samand Khan	Swabi/2
113.	62	40	16/4/83	Falza Hamid D/O Hamid Ullah Khan	Charsadda/2
114.	62	40	10/5/83	Minhas Aman D/O Aman Sher	Mardan/2
115.	62	40	12/4/84	Sara Ihsan D/O Ihsan Ullah	Charsadda/2
116.	62	40	12/4/84	Saira Faiz D/O Faiz Muhammad	Charsadda/2
117.	62	40	1/6/84	Nasira Begum D/O Muhammad Zubair	Dir Lower/3
118.	62	40	1/9/84	Gul Bukh D/O Nurul Qudus	Peshawar/2
119.	62	40	1/1/86	Nousheen Raziq D/O S. Fazle Raziq	Abbottabad/5
120.	62	40	11/1/86	Rubika Naeem D/O Naeem Akhtar	Abbottabad/5
121.	62	39	16/3/85	Shahla Jan D/O Jan Nisar	Charsadda/2
122.	61	43	11/4/84	Salma Ayaz D/O Mir Ayaz Khan	F.R Bannu/1
123.	61	43	21/4/84	Humera Shamshad D/O Shamshad Khan	Nowshera/2
124.	61	42	1/9/82	Alaha Qazi D/O Qazi Abdul Wahab	Peshawar/2
125.	61	42	5/2/85	Shazia Ayub D/O Ayub Khan	Khyber Agy/1
126.	61	42	28/2/85	Sheeba Wadud D/O Abdul Wadud	Swabi/2
127.	61	42	1/1/87	Naila Yahya D/O Yahya Gul	Charsadda/2
128.	61	41	11/7/80	Asmat Bibi D/O Ghulam Sarwar	Swabi/2
129.	61	41	1/11/80	Safia Naz D/O Zardullah Khan	Mardan/2
130.	61	40	19/12/77	Shazia Afridi D/O M. Akram Afridi	Khyber Agy/1
131.	61	40	11/11/79	Sara Faiz D/O Faiz ul Hassan	Charsadda/2
132.	61	40	22/2/80	Sarwat Jabeen D/O Muhammad Zaheer	Mardan/2
133.	61	40	28/4/81	Saira Rafiq D/O Muhammad Rafiq	Haripur/5
134.	61	40	4/11/82	Sadia Rauf D/O Abdur Rauf	Mardan/2
135.	61	40	14/3/83	Mehwish Ibrar D/O Muhammad Ibrar	Haripur/5
136.	61	40	20/4/83	Nasira Begum D/O Muhammad Nishat	Swabi/2
137.	61	40	1/7/83	Anila Khan D/O Rasool Khan (Lute)	Peshawar/2
138.	61	40	1/2/84	Nadira Gul D/O Risaal Khan	Nowshera/2
139.	61	40	1/2/84	Salma Bibi D/O Abdul Salam	Haripur/5
140.	61	40	2/3/84	Misbah Wadud D/O Abdul Wadud	Swabi/2
141.	61	40	7/2/85	Salqa Rahoem D/O Abdul Rahim	Karak/4
142.	61	40	1/4/85	Salma D/O Muhammad Younas	Mardan/2
143.	61	40	21/6/85	Sumera Asma D/O Inam	Peshawar/2

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144.	61	40	1/10/86	Shazma D/O Mir Hassan	Mardan/2
145.	61	39	14/7/83	Angela Rehman D/O Rehman Shah	Peshawar/2
146.	61	39	2/12/83	Saba Gul D/O Ashraf Iqbal	Haripur/5
147.	61	39	29/2/84	Aalia Farid D/O Farid Gul	Charsadda/2
148.	61	39	13/4/84	Nayab D/O Allah Dad	Mardan/2
149.	61	39	12/2/85	Raheela Naz D/O Muhammad Rasheed	Swabi/2
50.	61	39	22/2/85	Shumaila Alam D/O Sher Alam Khan	Mardan/2
151.	61	39	29/3/85	Sadia Nooren D/O Tariq Bahar	Nowshera/2
152.	61	39	3/4/86	Tabassum Gohar D/O Syed Gauhar Shah	Mardan/2
153.	61	39	6/2/87	Rahat Begum D/O Bahadar Sher	Mardan/2
154.	61	38	15/4/80	Aliya Firdos D/O Muhammad Ashiq	Bannu/4
155.	61	38	14/12/81	Kausar Parvalz D/O Muhammad Parvalz	Mkd Agy/3
156.	61	38	9/10/84	Lubna Shafiq D/O Shafiq ur Rehman	Karak/4
157.	61	38	17/1/85	Nazish Iftikhar D/O Iftikhar Ahmad	Haripur/5
158.	61	38	28/2/85	Sadaf Ambreen D/O Muhammad Aslam	D.I Khan/4
159.	60	41	14/10/82	Amreena D/O Mir Ahmed Shah	Nowshera/2
160.	60	41	13/2/84	Badar Samina D/O Syed Sardar Shah	Mardan/2
161.	60	41	1/1/85	Sameena Naz D/O Sultan	Bajaur Agy/1
162.	60	40	2/2/80	Nighat Parveen D/O Muhammad Aslam	Haripur/5
163.	60	40	2/2/82	Farzana Bibi D/O Muhammad Siddique	Haripur/5
164.	60	40	13/10/82	Nazish Bano D/O Sardar Muhammad	Swabi/2
165.	60	40	3/11/82	Nosheen Khan D/O Muhammad Almal Khan	Swat/3
166.	60	40	22/11/82	Shalsta Jabeen D/O Fazal ilahi	Mardan/2
167.	60	40	26/12/83	Neelam Azra Khattak D/O Muhammad Zarin Khattak	Nowshera/2
168.	60	40	21/3/84	Irrum Manzoor D/O Manzoor Ahmad	Mansehra/5
169.	60	40	12/4/84	Nazla Begum D/O Yar Muhammad	Mardan/2
170.	60	40	1/1/85	Sakeena Afridi D/O Muhammad Nawaz	Peshawar/2
171.	60	40	8/5/85	Humaira Pervaz D/O Muhammed Pervaz	Haripur/5
172.	60	40	14/4/86	Shamida Bibi Bangash D/O Gul Muhammad Bangash	Kurram Agy/1
173.	60	40	17/2/87	Urooj Salim D/O Salim Fawad Siddique	Peshawar/2
174.	60	39	10/11/76	Noshaba Malik D/O Muhammad Miskeen	Mansehra/5
175.	60	39	1/1/82	Fatima Sughra D/O Syed Muhammad Baqir	Orakzai Agy/1
176.	60	39	26/12/82	Kokab Al Sabah D/O Abdul Rasheed	Abbottabad/1
177.	60	39	5/1/85	Falza Rahman D/O Abdul Rahman	Mardan/2
178.	60	39	27/7/86	Bushra Haider D/O Shaukat Pervez	Abbottabad/5

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79.	60	38	15/2/78	Farsat Begum D/O Azim Khan	Swabi/2
180.	60	38	11/1/80	Khadija Shakir D/O Muhammad Shakir	Mansehra/5
181.	60	38	13/4/82	Misbah Akram D/O Muhammad Akram	Abbottabad/5
182.	60	38	3/10/85	Shazia Rafiq D/O Syed Rafiq Shah	Charsadda/2
183.	60	37	18/3/78	Javeria Hussain D/O Khadim Hussain	Peshawar/2
184.	60	37	6/12/81	Sarah Mazhar D/O Mazhar ul Haq	Mardan/2
185.	60	37	19/8/84	Adeela Hakeem D/O Hakim Ullah Qazi	Dir Lower/3
186.	60	37	5/1/85	Sumaira Noor D/O Syed Noor ul Basar	Mardan/2
187.	60	36	28/12/80	Zilra Huma D/O Muhammad Jehangir Khan	D.I Khan/4
188.	60	36	12/4/85	Nadia Bibi D/O Zar Wali Khan	Bannu/4
189.	60	36	15/3/86	Tahira Jabeen D/O Muhammad Najib Ullah	Chitral/3
190.	59	41	15/9/83	Zahida D/O Hazrat Bilal	Peshawar/2
191.	59	41	1/1/86	Huma Gul D/O Muhammad Younas	Charsadda/2
192.	59	40	20/3/79	Fazilat Khattak D/O Sarfaraz Khattak	Nowshera/2
193.	59	40	25/4/82	Shahzadi Seema D/O Ahmad Shah	Swabi/2
194.	59	40	9/4/83	Sohaila Rani D/O Sald Muhammad Shah	Chitral/3
195.	59	40	1/4/84	Yasmeen Habib D/O Habib ur Rehman	Lakki Marwat/4
196.	59	40	1/1/85	Marifat Jahan D/O Aurang Zeb	Nowshera/2
197.	59	40	23/3/86	Nazliha Ali D/O Irfad Ali	Nowshera/2
198.	59	39	15/11/78	Shahab Afroz D/O Hashmat Ullah Khan	Charsadda/2
199.	59	39	23/3/80	Sarwat Sohrab D/O Sohrab Ali Khan	Mardan/2
200.	59	39	4/2/82	Sajma Bibi D/O Muhammad Ashraf	Mansehra/5
201.	59	39	1/4/82	Hameeda Naz D/O Abdur Rauf Khan	Swabi/2
202.	59	39	6/1/84	Nazla Sultana D/O Zardad Khan	Karak/4
203.	59	39	20/8/85	Saeeda D/O Ahmed Jan	Mkd Agy/3
204.	59	39	19/7/87	Neelam Asad D/O Asad Khan	Peshawar/2
205.	59	38	1/5/78	Shazia Norin D/O Athar Din	Abbottabad/5
206.	59	38	15/8/80	Farhana Sadia D/O Muhammad Sadia	Abbottabad/5
207.	59	38	6/11/80	Haira Bibi D/O Bakht Eiland	Mardan/2
208.	59	38	4/8/81	Sajida D/O Halder Zaman Khan	Swabi/2
209.	59	38	9/3/83	Safia Shams D/O Shams ur Rehman	Charsadda/2
210.	59	38	9/3/83	Shahla Shafique D/O Shafique ur Rehman	Mansehra/5
211.	59	38	21/10/83	Shagufta Naz D/O Zahir Zaman	Swabi/2
212.	59	38	1/3/85	Gul Sheerazi D/O Aziz ur Rehman	Haripur/5
213.	59	37	6/7/82	Sobia Mashkooor D/O Mashkooor Ahmad Sabar	Mansehra/5
214.	59	37	26/8/82	Rahat Un Nisa D/O Nazam Khan	Abbottabad/5

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215.	59	37	25/2/83	Rashida Bibi D/O Muhammad Qadir Khan	Chitral/3
216.	59	37	3/4/83	Nazish Raees D/O Raees Khan	Swabi/2
217.	59	37	10/2/84	Saima Saleem D/O Muhammad Saleem	Haripur/5
218.	59	37	25/3/84	Bibi Aisha Gul D/O Muhammad Bahader Khan	Swabi/2
219.	59	37	13/1/85	Bushra Noreen D/O Shams ur Rehman	Abbottabad/5
220.	59	36	1/2/77	Adeela Rani D/O Muhammad Nawaz Khan	Mansehra/5
221.	59	36	21/3/84	Maryam Rauf D/O Rauf Khan	Kohat/4
222.	59	36	13/9/84	Parveen Balg D/O Sher Balg	Chitral/3
223.	59	36	4/4/85	Afshan Bibi D/O Anwar Khan Anwar	Charsadda/2
224.	58	40	2/3/81	Huma Rashid D/O Abdur Rashid	Mardan/2
225.	58	40	5/10/81	Abida Shaheen D/O Abdul Hakeem	Abbottabad/5
226.	58	40	2/5/83	Saima Riaz D/O Muhammad Riaz Khan	Mardan/2
227.	58	39	2/4/81	Sajqa Begum D/O Muhammad Ghulam	Nowshera/2
228.	58	39	1/4/83	Naila Akbar D/O Fazal Akbar	Swabi/2
229.	58	39	22/5/85	Nabilla Norin D/O Farhad Javed	Mardan/2
230.	58	39	1/9/85	Sobia Saeed D/O Muhammad Saeed	Haripur/5
231.	58	39	5/2/86	Farmina Tabassum D/O Wali Rahmat	Chitral/3
232.	58	39	15/3/86	Saira Sardar D/O Sardar ud Din	Peshawar/2
233.	58	39	1/1/87	Safia Zaibi D/O Ghani ur Rehman	Peshawar/2
234.	58	38	2/3/72	Fozia Shaheen D/O Pir Muhammad	Haripur/5
235.	58	38	13/4/79	Shazia Naz D/O Hidayat Ullah	Nowshera/2
236.	58	38	24/10/80	Sadia Amin D/O Bin Yamin	Swabi/2
237.	58	38	10/12/81	Sadia Kulsoom D/O Syed Ahmed Shah	Swabi/2
238.	58	38	1/5/83	Sameera Saleh D/O Saleh Muhammad	Charsadda/2
239.	58	38	13/3/84	Shahzadi Noreen D/O Mir Zaman Shah	Mardan/2
240.	58	38	20/3/86	Hasin Sahar D/O Mir Azam Shah	Chitral/3
241.	58	38	15/10/87	Sobia Hashmi D/O Khurshid Alam Hashmi	Haripur/5
242.	58	37	1/9/75	Shahnaz Begum D/O Gul Daraz Khan	Karak/4
243.	58	37	1/4/80	Robina Taslim D/O Muhammad Hashim	Chitral/3
244.	58	37	30/6/81	Ghazala Yasmeen D/O Saflullah	Charsadda/2
245.	58	37	29/3/82	Shereen Kifayat D/O Mian Kifayat Ullah	Nowshera/2
246.	58	37	6/6/82	Zubaida Khatoon D/O Taj Muhammad Khan	Karak/4
247.	58	37	6/6/82	Bibi Zainab D/O Gohar Rehman	Abbottabad/5
248.	58	37	15/6/82	Safia Shahzad D/O Shahzad Gul	Peshawar/2
249.	58	37	10/5/84	Nosheen Ramzan D/O Muhammad Ramzan	Haripur/5
250.	58	37	22/8/84	Farhanda Rehman D/O Noor Rehman	Peshawar/2

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251.	58	37	27/8/84	Nadia Afzal Khan D/O Fida Muhammad	Mkd Agy/3
252.	58	37	13/3/85	Nosheen Bibi D/O Khan Muhammad	UDA Mansehra/3
253.	58	37	18/4/86	Sumayya D/O Rahman Ullah	Mardan/2
254.	58	36	2/4/80	Palwasha D/O Abdur Rahmin	Swabi/2
255.	58	36	1/6/80	Sabiha Bibi D/O Muhammad Rafiq	Peshawar/2
256.	58	36	1/3/81	Shabana Gul D/O Gul Zaman	Abbottabad/5
257.	58	36	11/6/81	Zakia Gul D/O Gul Zaman	Abbottabad/5
258.	58	36	2/1/82	Anisa Wali D/O Shah Wali Khan	Mkd Agy/3
259.	58	36	11/9/82	Jawaria Inayat D/O Inayat Ullah Awan	D.I Khan/4
260.	58	36	11/9/82	Nabeela Naz D/O Ghulam Riaz Khan	Bannu/4
261.	58	36	25/2/83	Hussan Ara D/O Muhammad Altaf Hussain	Karak/4
262.	58	36	20/3/84	Aficer Bibi D/O Syed Qasim Shah	Chitral/3
263.	58	36	17/4/84	Noshin Hikmat D/O Hikmat Ullah	Karak/4
264.	58	36	14/5/84	Palwasha Malik D/O Malik Hashmat Ali	Charsadda/2
265.	58	36	5/8/85	Arshiya Iqbal D/O Muhammad Iqbal	D.I Khan/4
266.	58	36	1/9/86	Asifa Ashraf D/O Malik Muhammad Ashraf	D.I Khan/4
267.	57	41	21/8/76	Saima Imran D/O Abdul Qadus	Mohmand Agy/1
268.	57	40	1/12/84	Sana Muzaffar D/O Muzaffar Khan	Nowshera/2
269.	57	40	8/2/85	Fozia Sher Jan D/O Shor Jang	Swabi/2
270.	57	39	17/10/81	Guinaz D/O Saleem Muhammad	Peshawar/2
271.	57	39	26/11/86	Fauzia Tabbasum D/O Israr Ahmad Khan	Chitral/3
272.	57	38	4/4/79	Sadia Rani D/O Muffarab Shah	Mardan/2
273.	57	38	14/12/79	Bilqees Bano D/O Muhammad Suleman Abbasi	Abbottabad/5
274.	57	38	20/6/80	Irum Karim D/O Abdul Karim	Abbottabad/5
275.	57	38	26/6/83	Noreen Bibi D/O Ahmad Khan	Haripur/5
276.	57	38	1/1/86	Sabahat Gul D/O Gullistan Khan	Charsadda/2
277.	57	38	2/9/86	Ghazala Saleem D/O Muhammad Saleem	Chitral/3
278.	57	38	29/12/87	Salma Noor D/O Noor Muhammad	Swabi/2
279.	57	37	15/2/79	Rabihat Begum D/O Khawaja Muhammad	Charsadda/2
280.	57	37	28/3/83	Samra Bibi D/O Muhammad Misri Khan	Haripur/5
281.	57	37	23/6/83	Robina Nazli D/O Jehan Sher Khan	Swat/3
282.	57	37	22/10/83	Latafat Yasmeen D/O Misal Khan	Karak/4
283.	57	37	26/6/84	Bushra Bibi D/O Muhammad Ismail	Haripur/5
284.	57	37	15/3/85	Shaista Naseer D/O Naseer Ahmad	Charsadda/2
285.	57	37	11/1/86	Zeb Faryal Mir D/O Iqbal Shaheen	Chitral/3
286.	57	37	13/6/86	Mehreen Riaz D/O Riaz	Mkd Agy/3

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				Muhammad	
287.	57	37	2/8/87	Saba Naz D/O Muhammad Nawaz Khan	Mansehra/5
288.	57	37	4/11/87	Shumaila Nisar D/O Nisar Ahmad	Mansehra/5
289.	57	36	16/9/79	Shumaila Noureen D/O Muhammad Hayat Khan	Bannu/4
290.	57	36	10/4/80	Suriya Mehnaz D/O Rais Khan	Karak/4
291.	57	36	4/4/82	Nadia Bibi D/O Manzoor Elahi	Haripur/5
292.	57	36	10/2/83	Fareena Mahak D/O Abdul Rasheed Khan	D.I Khan/4
293.	57	36	28/2/83	Samra Tul Ain D/O Haji Mushtaq Ahmad	Peshawar/2
294.	57	36	31/3/83	Salma Saeed D/O Khan Saeed	Charsadda/2
295.	57	36	27/3/84	Salma Saeed D/O Muhammad Saeed	Kohat/4
296.	57	36	3/1/85	Rukhsana Zaib D/O Alam Zaib	Mkd Agy/3
297.	57	36	1/3/85	Rifat Niaz D/O Umar Niaz Khan	Bannu/4
298.	57	36	19/3/85	Sumeerah Yasmin D/O Ahmad Nawaz	D.I Khan/4
299.	57	36	23/3/85	Aisha Naz D/O Mirza Ali Khan	Karak/4
300.	57	36	23/2/86	Zartasha Khan D/O Jehanzeb Khan	Abbottabad/5
301.	56	39	4/2/85	Shagufta Rehman D/O Muhammad Rehman	Bajaur Agy/1
302.	56	38	20/12/84	Najmusahar Bibi D/O Sher Zaman Shah	Mardan/2
303.	56	38	19/7/86	Ayesha Bibi D/O Haq Nawaz	Nowshera/2
304.	56	37	13/4/79	Parveen Nisa D/O Sakhawat Shah	Buner/3
305.	56	37	30/3/80	Musarrat Begum D/O Habib Jan	Dir Lower/3
306.	56	37	12/3/81	Ulfat Begum D/O Tayyab Jan	Mardan/2
307.	56	37	3/12/81	Rohi Omar D/O Hazrat Omar	Mkd Agy/3
308.	56	37	1/3/83	Yasmin Gul D/O Sher Bahadur	Mansehra/5
309.	56	37	11/4/83	Sabeen Begum D/O Gulzar Muhammad	Nowshera/2
310.	56	37	1/1/84	Sheema Rehman D/O Yousaf Rehman	Swabi/2
311.	56	37	15/3/85	Saira Gul D/O Gul Nawaz Khan	Chitral/3
312.	56	37	31/3/86	Salma Gul D/O Abdul Fateh	Charsadda/2
313.	56	36	25/2/75	Saira Bibi D/O Gul Payao Khan	Karak/4
314.	56	36	12/11/77	Gulshan Ara D/O Habib Ullah Khan	Lakki Marwat/4
315.	56	36	4/1/78	Shabnam Ara Bibi D/O Shah Pasand	Mardan/2
316.	56	36	13/9/79	Bibi Mahnaz D/O Muhammad Akram Jadoon	Abbottabad/5
317.	56	36	12/10/80	Syeda Rabana Bukhari D/O Syed Amanat Ali Bukhari	Abbottabad/5
318.	56	36	30/7/82	Nilofar Begum D/O Bakht Foor	Mkd Agy/3
319.	56	36	23/11/83	Rana Pervaiz D/O Muhammad Pervaiz	Haripur/5
320.	56	36	12/12/83	Sabina Bibi D/O Khan Afsar Khan	Abbottabad/5
321.	56	36	1/3/84	Shabina D/O Fazal Gul	Swat/3

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322.	56	36	16/3/84	Noushen Kausar D/O Ghulam Rabbani	Peshawar/2
323.	56	36	14/6/84	Irum Nausheen D/O Muhammad Ali Khattak	Karak/4
324.	56	36	1/9/85	Amina Haroon D/O Muhammad Haroon	Mansehra/5
325.	56	36	7/10/85	Surya Anjum D/O Muhammad Nagin	Dir Lower/3
326.	56	36	25/12/87	Nosheen Hamayun D/O Syed Hamayun Shah Bacha	Mardan/2
327.	55	39	1/4/82	Alla Bibi D/O Muhammad Tahirullah	Peshawar/2
328.	55	39	26/3/84	Sadaf Afreen D/O Abdul Rehman	Haripur/5
329.	55	38	11/7/85	Jasmeet Kumari D/O Ram Saroop	Swat/3
330.	55	38	2/2/87	Siyam Akbar D/O Muhammad Akbar	Mohmand Agy/1
331.	55	37	5/2/76	Raheela Rahman D/O Abdur Rehman	Dir Lower/3
332.	55	37	4/6/77	Zahida D/O Abdul Hameed Khan	Buner/3
333.	55	37	19/3/80	Sadaf Saboor D/O Abdus Saboor	Haripur/5
334.	55	37	17/12/82	Saira D/O Abdul Ghafoor	Peshawar/2
335.	55	37	1/1/85	Safena Akhtar D/O Misaal Khan	Nowshera/2
336.	55	37	30/4/85	Zahab Begum D/O Muhammad Khurshid	Swabi/2
337.	55	37	14/8/85	Azra Gul D/O Muhammad Khan	Mardan/2
338.	55	37	14/8/85	Mehwish Mushtaq D/O Mushtaq Ahmad	Abbottabad/5
339.	55	37	20/7/86	Aqeela Subhan D/O Fazil Subhan	Charsadda/2
340.	55	36	16/8/73	Aqeela Naz D/O Ghulam Muhammad	Mardan/2
341.	55	36	14/8/76	Salma Iqbal D/O Muhammad Iqbal	Kohat/4
342.	55	36	1/1/80	Shahida Bibi D/O Muhammad Hashim Khan	Chitral/3
343.	55	36	1/2/80	Aneela Begum D/O Wasil Khan	Swabi/2
344.	55	36	1/2/80	Mumtaz D/O Faiz ur Rehman	Swat/3
345.	55	36	15/10/80	Ishrat Begum D/O Wahab Gul	Mardan/2
346.	55	36	4/2/81	Samina Akhtar D/O Akhtar Shah	Gadoon Swabi/3
347.	55	36	22/2/81	Safia Bibi D/O Iqbal Hussain	Nowshera/2
348.	55	36	2/4/81	Sadia Gul D/O Zain Ullah Khan	Nowshera/2
349.	55	36	27/10/81	Shabnum Bahar D/O Ali Dameaz Khan	D.I Khan/4
350.	55	36	1/12/81	Fuqrat Begum D/O Muhammad Amin	Swabi/2
351.	55	36	1/1/82	Aemat Begum D/O Yar Muhammad	Dir Lower/3
352.	55	36	2/2/82	Fehmeeda Naz D/O Sher Din	Nowshera/2
353.	55	36	3/3/82	Jayida D/O Fazal Rahim	Swat/3
354.	55	36	1/12/82	Farkhanda Hayat D/O Hayat Khan	Swabi/2
355.	55	36	1/5/83	Farhana Naz D/O Lal Muhammad	Mkd Agy/3
356.	55	36	28/2/84	Almas Malik D/O Muhammad Ilyas	Haripur/5
357.	55	36	20/3/84	Bilqies Begum D/O Mir Alam Khan	Charsadda/2

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358.	55	36	15/2/85	Hasina D/O Niamat Ullah	Mkd Agy/3
359.	55	36	18/7/85	Zubairia Ibadat D/O Syed Ibadat Shah	Abbottabad/5
360.	55	36	29/9/85	Lubna Begum D/O Farid Ullah Khan	Mkd Agy/3
361.	55	36	6/3/86	Aasma Ghazala D/O Nisar Muhammad	Mkd Agy/3
362.	55	36	1/4/86	Sheraz Bano D/O Hakim Jan	Karak/4
363.	55	36	8/9/86	Rizwana Habib D/O Habib Ullah	D.I Khan/4
364.	55	36	20/12/87	Sundas Ali D/O Amlad Ali	Charsadda/2
365.	54	38	9/11/83	Fozia Tabassum Afridi D/O Aqil Khan	FR Koha/1
366.	54	38	10/10/86	Nazira Jalal D/O Syed Jalal ud Din	Chitral/3
367.	54	37	18/4/74	Nabila Gul D/O Sabir Khan	Haripur/5
368.	54	37	1/8/80	Sarwar Parveen D/O Muhammad Sarwar	Chitral/3
369.	54	37	1/4/83	Marja Rabani D/O Ghulam Rabani	Haripur/5
370.	54	36	1/4/74	Huma Nadir D/O Qazi Jamil Ahmad Abbas	Nowshera/2
371.	54	36	6/3/80	Fozia D/O Wali Muhammad	Swabi/2
372.	54	36	6/6/80	Najma Anjum D/O Muhammad Karim	Mardan/2
373.	54	36	1/9/81	Nighat Seema D/O Fateh Muhammad	Mardan/2
374.	54	36	2/9/81	Aasma Noreen D/O Fazal Nawab	Nowshera/2
375.	54	36	7/3/82	Sumera Begum D/O Hunar Khan	Nowshera/2
376.	54	36	19/11/82	Sughra Mumtaz D/O Mumtaz Abbas	Abbottabad/5
377.	54	36	3/2/83	Naheed Akhtar D/O Muhammad Saleem	Swabi/2
378.	54	36	25/3/84	Tahira Jabeen D/O Rahmat	Mansehra/5
379.	54	36	6/4/85	Fareena Halder D/O Halder Zaman	Haripur/5
380.	54	36	2/4/87	Hasina Khusrav D/O Nasir Khusrav	Chitral/3
381.	53	36	1/3/80	Uzma Shaheen D/O Fazlur Rehman	Abbottabad/5
382.	53	36	28/2/83	Laila Khalid D/O Bakhtiar Khan	Charsadda/2
383.	53	36	1/4/83	Nabeela Kosar D/O Noor Jamal	Mkd Agy/3
384.	52	36	5/9/83	Noshad Bangash D/O Mohabbat Khan Bangash	Kurram Agy/1
385.	52	36	5/5/85	Bibi Zainab D/O Muhammad Rashid	Mansehra/5

*[Handwritten signature]*

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

**Service Appeal No:1015/2019**

**Mst: Ghazala Ex SST (G) B-16 District Mardan. ...Appellant.**

**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 PAKHATUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

**Service Appeal No: 1015/2019**

**Mst: Ghazala 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 31/12/2012 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 31/12/2012 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 31/12/2012 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

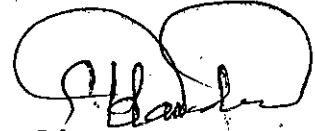
**ON GROUNDS.**

- 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 & 1<sup>st</sup> 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 1<sup>st</sup> appointment Notification dated 31/12/2012 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.

F. 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

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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 &amp; 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&amp;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) 2<sup>nd</sup> 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) 1<sup>st</sup> 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

1/1

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: 2<sup>nd</sup> 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.	Field 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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TESTED

(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 Physis, 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 Physis, 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, Manshira, 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 Physis, 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.

TESTED

(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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o. 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

1. 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.
2. 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.

(i) 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 Mausehra 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.

(ii) 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.

(iii) 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.

(iv) 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.

1/1





ANNEX

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. 5833-37 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