

No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	03.02.2020	<p style="text-align: center;"><b><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u></b> <b><u>AT CAMP COURT SWAT</u></b></p> <p style="text-align: center;"><u>Appeal No.196/2019</u></p> <p style="text-align: center;">Date of Institution ... 17.12.2018 Date of Decision ... 03.02.2020</p> <p style="text-align: center;">-----</p> <p>Mst Shahida Hassan PET Govt. School Gari Usman Khail Dargai Malakand.</p> <p style="text-align: right;">----- Appellant</p> <p style="text-align: center;"><b><u>Versus</u></b></p> <p>Head Mistress G.G.H.S School Gari Usman Khail Dargai Malakand and others</p> <p style="text-align: right;">----- Respondents</p> <p style="text-align: center;"><b>Muhammad Hamid Mughal.....Member(J)</b> <b>Mr. Hussain Shah .....Member(E)</b></p> <p><b><u>JUDGMENT</u></b></p> <p><u>Mr. HUSSAIN SHAH</u>:-Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present.</p> <p>2. The instant appeal has been filed U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned order No. 4955-59 dated 30.10.2018 of the respondent No.2 and the impugned order dated 15.11.2018 with prayer that the above mentioned two (02) impugned orders may be set aside and the appeal may be accepted with direction to the respondents for the payment of the arrears of the salary and conduct an inquiry against the respondent No. 1 &amp; 2 for misuse of their official powers and committing the violation of the fundamental rights of the appellant and her minor children on the basis of the facts &amp; grounds as noted in the memo of appeal.</p> <p>3. The appellant was serving as a PET in the GGHS Ghari Usman Khail Dargai Malakand since 1999 while she was serving in the same</p>

school for the last twenty (20) years. She was posted out vide impugned order dated 30.10.2018 by respondent No.2 which was delivered to the appellant on 07.11.2018. Being aggrieved by this order she preferred a departmental appeal on 14.11.2018 before respondent No.3 which was referred back to respondent No.2 for submitting detail report on 15.11.2018. Where after the instant service appeal was preferred on 18.12.2018.

4. The learned counsel for the appellant contended that the impugned order of 30.10.2018 was issued on the behalf of respondent No.1 by respondent No.2 on malafide intentions, without merit and in violation of fundamental rights and service discipline. Further contended that respondent No.1 the Headmistress of the school was involved in inappropriate attitude and behaviors with the appellant and the appellant was despite performing her duties subjected to misbehaviors. Further contended that the appellant is a cardiac patient and has minor children and a jobless husband. Being PET the respondent No.1 were asking her to attend the classes of subjects in addition to her PET job. He further stated that the appellant used to attend such additional classes over and above her job description and delivered good result in examination in her subjects. Further informed that the appellant lodged complaints against respondent No.1 to higher authorities resultantly an inquiry was conducted in which the inquiry officer recommended that a warning be issued to the Headmistress (respondent No.1) on grounds of loose administration and with direction to cooperate with her subordinate staff and keep conducive and peaceful environment for teaching learning process. It was also recommended that the appellant may be warned to extend cooperation with respondent No.1. The learned counsel for the appellant further contended that the appellant was posted out vide

impugned order dated 30.10.2018 while respondent No.1 is still working as the Headmistress of the same school.

5. Learned Deputy District Attorney contested the facts, grounds of the appeal and arguments of the learned counsel for the and stated that the transferred of the appellant was caused by her own conduct as she was not cooperating with respondent No.1, consistent refusal to take classes other than her own subject specifically the classes of those teachers who were on leave for one reason or other. The dispute between the appellant and the Headmistress (respondent No.1) was disturbing the environment of the education and learning of the children in the school. Moreover the appellant was serving in the same school since 1999, for almost twenty (20) years. Vide impugned order the appellant was posted to the school located in her own village in the same premises. Moreover it was contended that four (04) inquiries were conducted and where-after the appellant was transferred to her home station. Hence no malafide has been committed by the respondent as the post of PET at GGHS Dargai is in BPS-15 and the post in GGHS Ghari Usman Khail has been filled by another PET in the same grade. As regarding the action on the part of the respondent on her departmental appeal the same was not finalized as the appellant filed the instant service appeal while action <sup>on it</sup> of her appeal was under process.

6. Arguments heard. File perused.

7. After the detailed scrutiny of the documents record on file arguments and counter arguments of learned counsel for the appellant, and learned Deputy District Attorney, this Tribunal observes that the appellant has completed almost twenty (20) year service in the same premises so the grounds on which the appellant has based her appeal are not sufficient to seek favor from this Tribunal specifically keeping in

view that the school to which she has been posted is at her village and at a distance of six (06) kilometer from her previous school.

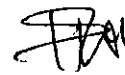
8. This may observed that as per material on file, respondent No.1 has failed to maintain discipline in the school and she lacks administrative skills in maintaining cooperation with the staff and teachers. As the first inquiry conducted in the case the inquiry officer recommended that warning may be issued to the Headmistress (respondent No.1).

9. In view of the above discussion we are of the considered view to dismiss the present service appeal with the observation that the respondents may also consider the posting transfer of the respondent No.1. Parties are left to bear their own costs. File be consigned to the record room.

Disposed off accordingly.



(Muhammad Hamid Mughal)  
Member  
Camp Court Swat



(Hussain Shah)  
Member  
Camp Court Swat.


ANNOUNCED


03.02.2020

06.01.2020

Husband of the appellant on behalf of the appellant present. Mr. Usman Ghani, District Attorney alongwith M/S Bashir Ahmad, Headmaster and Sher Azam, Assistant for official respondents No. 1 to 4 and husband of private respondent No. 5 present.

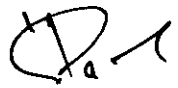
Vide order sheet dated 03.09.2019, the case was adjourned on the request of husband of the appellant at cost of Rs. 1000/- but today neither counsel for the appellant is present nor cost has been paid so far and the husband of the appellant again requested for adjournment, therefore, last chance is given to the appellant to produce counsel on the next date positively with further direction to pay the cost on that date. Case to come up for arguments and payment of cost of Rs. 1000/- on 03.02.2020 before D.B at Camp Court Swat.

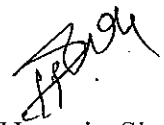
  
(Hussain Shah)  
Member  
Camp Court Swat

  
(M. Amin Khan Kundi)  
Member  
Camp Court Swat

03.02.2020

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Vide our detail judgment of today of this Tribunal placed on file we are of the consider view to dismiss the appeal with the observation that the respondents may also consider the posting of the respondent No. 1 ~~of~~ Parties are left to bear their own costs. File be consigned to the record room.

  
(Muhammad Hamid Mughal)  
Member  
Camp Court Swat

  
(Hussain Shah)  
Member  
Camp Court Swat.


ANNOUNCED


03.02.2020

Service Appeal No. 196/2019

05.11.2019

Counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Sher Azam Khan, Assistant on behalf of official respondents No. 1 to 4 and Mr. Imtiaz Khan, husband of private respondent No. 5 present. Husband of private respondent No. 5 requested for adjournment on the ground that he is going to engage counsel. Last chance is granted to private respondent No. 5 for arguments. Adjourned to 04.12.2019 for arguments before D.B at Camp Court Swat.

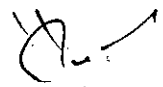
  
(Hussain Shah)  
Member  
Camp Court Swat

  
(M. Amin Khan Kundi)  
Member  
Camp Court Swat

04.12.2019

Lawyers are on strike on the call of Bar Association. Adjourn. To come up for further proceedings/arguments on 06.01.2020 before D.B at Camp Court, Swat.

  
Member


  
Member  
Camp Court, Swat

03.09.2019

Jehanzeb husband of the appellant on behalf of appellant present. Bashir Ahmad husband of respondent No.1 on behalf of respondent No.1 present. Sher Azam Khan Assistant for official respondents present. Husband of the appellant seeks adjournment on the ground that learned counsel for the appellant is not available. Being a case of transfer posting, adjourned at the cost of payment of Rs.1000/- to be paid on behalf of appellant to the respondents. Last opportunity is granted. To come up for arguments on 07.10.2019 before D.B at Camp Court, Swat.

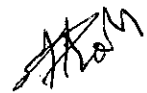
Husband of the appellant submitted an application for transfer of the present service appeal to Principal Seat Peshawar. To also come up for arguments on the said application on the date fixed.


Member

  
Member  
Camp Court, Swat.

07.10.2019

Counsel for the appellant and Mr. Anwar-ul-Haq, Deputy District Attorney alongwith Mr. Bashir Ahmed, Headmaster for official respondents No. 1 to 4 present. None present on behalf of private respondent No. 5 therefore, notice be issued to her for attendance and arguments for 05.11.2019 before D.B at Camp Court Swat.

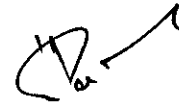
  
(Hussain Shah)  
Member  
Camp Court Swat

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Swat

10.06.2019

Learned counsel for the appellant present. Bashir Ahmad Headmaster and Toseef Ahmad Litigation Officer present. Reply on behalf of official respondents submitted. Written reply on behalf of private respondent No.5 not received.

Posting transfer order has been made impugned in the present service appeal, as such the present service appeal is assigned to D.B for further proceedings. Fresh notice be issued to private respondent No.5 for reply before D.B on the date fixed as 02.07.2019 at Camp Court, Swat.



Member  
Camp Court, Swat.

02.07.2019

Husband of the appellant on behalf of the appellant present. Mian Amir Qadir, DDA alongwith Mr. Muhammad Bashir, H.M for respondents present. Arguments could not be heard due to general strike of the Bar. Adjourn. Case to come up for arguments on 03.09.2019 before D.B at camp court Swat.



Member



Member  
Camp Court Swat




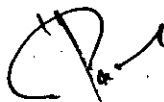
05.04.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant has filed the present service appeal being aggrieved against the posting transfer order dated 30.10.2018 regarding her transfer from Government Girls High School Gari Usman Khel Tehsil Dargai to Government Girls High School Dargai.


It transpired that vide impugned posting transfer order the appellant has been transferred from one school to another at the same station. In the interest of justice, the present service appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 06.05.2019 before S.B at Camp Court, Swat.

  
Appellant Deposited  
Security & Process Fee

  
Member  
Camp Court, Swat.

07.05.2019

Appellant with counsel present. Written reply not submitted. Bashir Ahmad Headmaster representative of respondent No.2 and Toseef Ahmad Litigation Officer representative of respondent No.3 absent. Posting transfer order is made impugned in the present service appeal. Notice of attachment of salary be issued to the absent representatives. Fresh notice be issued to the respondents for submission of reply/parawise comments. Adjourn. To come up for written reply/comments on 10.06.2019 before S.B at Camp Court Swat.

  
Member  
Camp Court, Swat.

Form- A

FORM OF ORDER SHEET

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

Case No. 196/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/2/2019	<p>The appeal of Mst. Shahida Hassan resubmitted today by Mr. Rahim Khan 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;"><i>[Signature]</i> REGISTRAR 12/2/19</p>
2-	15-2-19	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>05-04-2019</u>.</p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>


Reference your reply submitted in response to our observations, it is reiterated that the objection/observations raised by this office have not been removed and still stand as it is:

"the appeal, in hand, is premature and cannot be entertained/processed by this office unless and until the objections are removed. There is no final order; annexure-H is original impugned order but not a final order of the appellate authority".

The appeal, being premature, therefore, returned again in original and be submitted when cause of action arises the matter.

No. 116 /S.T,

Dt. 17/01 /2019

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Rahim Khan Advocate,  
District Court Buner.

*Re-Submitted with the request that the Service appeal returned under observation to be premature is now after the lapse of the Statutory period 90 days.*

*Hence Submitted please in a Revised manner.*

*The Honable;*  
*Registrar,*  
*Service Tribunal*  
*IS-P. K. Peshawar.*  
*Please.*

*Rahim Khan*  
*Adv.*  
*Dated 02-02-2019.*


This is an appeal filed by Mst. Shahida Hasssan today on 17/12/2018 against the order dated 30.10.2018 against which she preferred/made departmental appeal/representation on 14.11.2018 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa, Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiency.

- 1- Memorandum of appeal is not signed by the counsel.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be flagged.
- 4- Annexures-A & B of the appeal are missing.
- 5- Annexures of the appeal are not in sequence which may be annexed serial as mentioned in the memo of appeal.
- 6- Six more copies/sets of the appeal along with annexures i.e. complete in all respects may also be submitted with the appeal.

No. 2405 /ST,

Dt. 18-12-2018

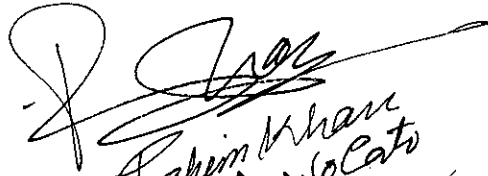
  
 REGISTRAR  
 SERVICE TRIBUNAL  
 KHYBER PAKHTUNKHWA  
 PESHAWAR.

Mr. Rahim Khan Adv.  
Distt. Court Buner.

*Re-Submitted with the request that Final order of Resp. No. 3 <sup>vide stick</sup> who on dt. 15/11/2018, the Departmental appeal of the appellant dated 14/11/2015, has endorsed (copy of the order impugned) to the Respondent, no 2, For consideration, is annexed as "H" P-36.*

*Therefore keeping in view the above the Service appeal of the appellant is mature. Hence Re-submitted, with the request to be fixed at an early date as application for temporary injunction is also on pages 6+7 has to be argued. Furthermore the entire observations have also been attended to and removed the Short Falls or discrepancies, pointed out by <sup>deleting the needful</sup> Submitted Please.*

*In the Honor of*  
*the Registrar*  
*Service Tribunal KP*  
*Peshawar.*

  
 Rahim Khan  
 Advocate  
 26.12.2018.

*Re-submitted again with the request that Justice the instant Service appeal has been*

P. TO.

Resubmitted by hand through  
appellant herself, but sorry  
to submit that despite to entertain  
the same appeal, the same has <sup>orally</sup> again  
and again returned with out recor-  
ding any thing in response to my  
Reply/Comments (i.e. in written).

Hence the same is Resubmitted  
with the Request that Final order <sup>Non P. 36</sup>  
by the Appellate Authority/Resp. NO 3  
has been passed on 18/11/18 Received  
Priority on 18/11/18 and the appeal  
is mature + ready in time.

Please entertain it or otherwise  
Please Return it to avoid writ oppor-  
tunity being unavoidable because pay of  
the appellant has been stopped wrongly  
and further suffering is also expected.

Submitted please

Honorable  
Registrar  
K.P. Service Tribunal  
Mumbai

Rahim Khan  
Adv. High Court.  
12/01/2018


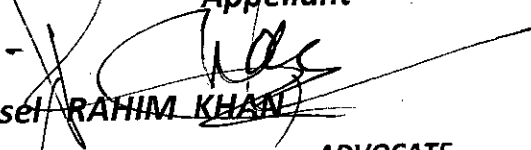
**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTONKHWAW PESHAWAR.**

Service Appeal No. 196 /2018

**Mst, Shahida Hassan**                      **VERSUS**      **Head Mistress and others..**

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5	Copies of testimonials of the appellant	"B"	12-15
6	Copies of diagnostic and treatment papers of the appellant	"C"	16-31
7	Copy of application dated 28-11-2018 of the appellant for requisition of attested copies of inquiry etc if any. + app/ Complaint.	"D"	0-32
8	Copy of impugned order dated 30-10-2018 of respdt No.2	"E"	33-34. 0-35
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11	copy of impugned order endorsed by respondent No.3 dated 15-11-2018 + Copy of letter No. 154 dt. 28-11-018 of Resp. + Job Description.	"H"	39-40 41-42 43-44
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**Appellant**  
  
**Through Counsel RAHIM KHAN**  
**ADVOCATE**  
**HIGH COURT PESHAWAR**  
 Office; at Distt; Courts DaggarBuner.  
 Cell= 03439049185  
 Dated;12//12/2018.

(1)

**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTONKHWA PESHAWAR.**

Service Appeal No. 196 /2018

Mst, Shahida Hassan PET Govt; Girs High School Gari Usman Khail Dargai  
Distt; Malakand at Batkhaila .

" APPELLANT "

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 1762

Dated 17-12-2018

VERSUS

1. Head Mistress G.G.H.School Gari Usman Khail Dargai Malakand.
- 2 D.E.O Female Malakand at Batkhaila.
- 3 Director Elementary & Secondary Education Khybar Pukhtoonkhwa Peshawar.
- 4 Secretary Elementary & Secondary Education Khybar Pukhtoonkhwa Peshawar.
- 5 Seema (NTS APPOINTEE) PET GGSS KOT Distt; Malakand.

" Respondents "

SERVICE APPEAL U/S 4 OF THE KHYBER PUKHTONKHWA , SERVICE TRIBUNAL ACT 1974, AGAINST THE ORDER IMPUGNED, Endors; NO.4955-59 DT,30/10/2018,ISSUED BY THE RESPONDENT NO.2, WHEREBY, THE APPELLANT, BEING PET BPS 15, HAS WRONGLY BEEN TRANSFERRED ON ADMINISTRATIVE GROUNDS, TO the G.G.H.S.DARGAI , ON WRONG POST OF BPS 16, WITH OUT PROPOSING HER COUNTERPART , ON MALAFIDE INTENTION AND ILL WILL, JUST TO DISLOCATE AND DISAPPOINT, THE APPELLANT, FOR NO FAULT OF HER, WITHOUT REASONABLE GROUNDS OR JUSTIFICATION. AGAINST WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT dt,14/11/2018, BY THE WORTHY RESPONDENT No.3 , WHILE CONSIDERING, FAVOURABLY ON GOOD WELL , HAD ENDORSED COPY OF THE IMPUGNED ORDER ON dated, 15/11/2018, IMPUGNED, (got an attested copy on dt,18/11/018), FALLOWED BY AN OTHER LETTER ALSO, DATED, 28/11/2018, WHICH THE RESPONDENT NO.2, HAS NOT COMPLYING WITH , JUST TO KEEP THE APPELLANT , BEING CARDIAC PATIENT , IN AGONIZING STATE FOR UNLIMITED PERIOD AGAINST THE LAW. WHILE, ADDITIONALLY, IN VIOLATION OF STANDING RULES AND INSTRUCTIONS OF THE LAW AND PARLEMENTARY AFFAIRS & HUMAN RIGHTS DEPARTMENT K.P,S LETTERS DATED 26/3/2012 FOLLOWED BY 11/12/2012, BY VIOLATING THE FUNDAMENTAL RIGHTS, OF THE APPELLANT AND HER DEPENDENTS, MONTHLY SALARIES OF THE APPELLANT, HAS ALSO BEEN STOPPED AND ATTACHED, SINCE 10/11/2018. JUST FOR UNLAWFULL AND UNDULY TORTUR OF THE APPELLANT AND HER DEPENDENTS, FOR NO FAULT OF HER/THEME.

Respectfully sheweth;

**PRAY IN APPEAL**

On acceptance of the instant service appeal of the appellant, being cardiac patient , the transfer order impugned, End; No.4955-59 dated 30/10/2018, passed by the respondent No.2 , totally based , on mala intention and ill well, which falls against the interest of public

Filed to-day

Registrar

17/12/18  
Re-submitted to-day  
Registrar

interest and also is against the interest of the students of both the schools too, passed on administrative grounds, disapproved by the worthy respondent No.3, vide his aforementioned endorsement, dated, 15/11/2018, being not complied with, so far and is still on ground, too, may graciously,, both be set aside, in favour of the appellant, with further relief as this august Tribunal deems suitable and fit, under the law and policies exist, may also be granted to the appellant. and directions for the payment of the arrears of the so attached monthly salaries from the due date and future continuously payment, without any break, may also be issued to the respondents No.1 & 2 by imposing special cost and damages on them.

The Respondent No.4 may also be directed, to arrange inquiry against the Respondents No.1 & 2, for miss use of their official powers and violation of fundamental rights of the appellant and her five minor school going children and a jobless husband, by un lawfully stoppage and attaching the monthly salary, of the appellant depending on, for further proceeding against them.

#### **FACTS.**

1. That the appellant has performing her duty for about the last twenty years with great keen and devotion by maintaining the duly punctuality. She always remained almost obedient to all of her bosses. As no complaint has so far been made against her.. Copy of appointment order is annexed as "A".
2. That the appellant has gained and have a handsome academic and professional qualification ie M.A, B.ED, M.ED and DPED and by dint of that she always gets hundred percent results of her duty as teacher. Copies all of her testimonials are annexed as "B".
3. That the appellant having five(5) schools going children and a jobless husband. So she has to look after and satisfy numbering six dependents too, apart from her official duty and always remained under stress of huge responsibilities being cardiac ailing female sex and teacher. While her adjustment in present school, GGHS Gari Usmankhail, was most helpful and useful towards both of her duty and family set up, being cardiac female patient.
4. That the attitude of the respondent No.1, remained rough and negative for no fault or blunder of the appellant. She constantly disgraces and degrades the appellant, not only in presence of her colleagues teachers, but also of her pupils too, which resultantly caused un due tension to the appellant. So consequently, the appellant, became cardiac patient and is under treatment of cardiologist, for which she(the appellant) reserve the right to sue against respondent N.1, 2 for claiming of damages in a competent





(3)

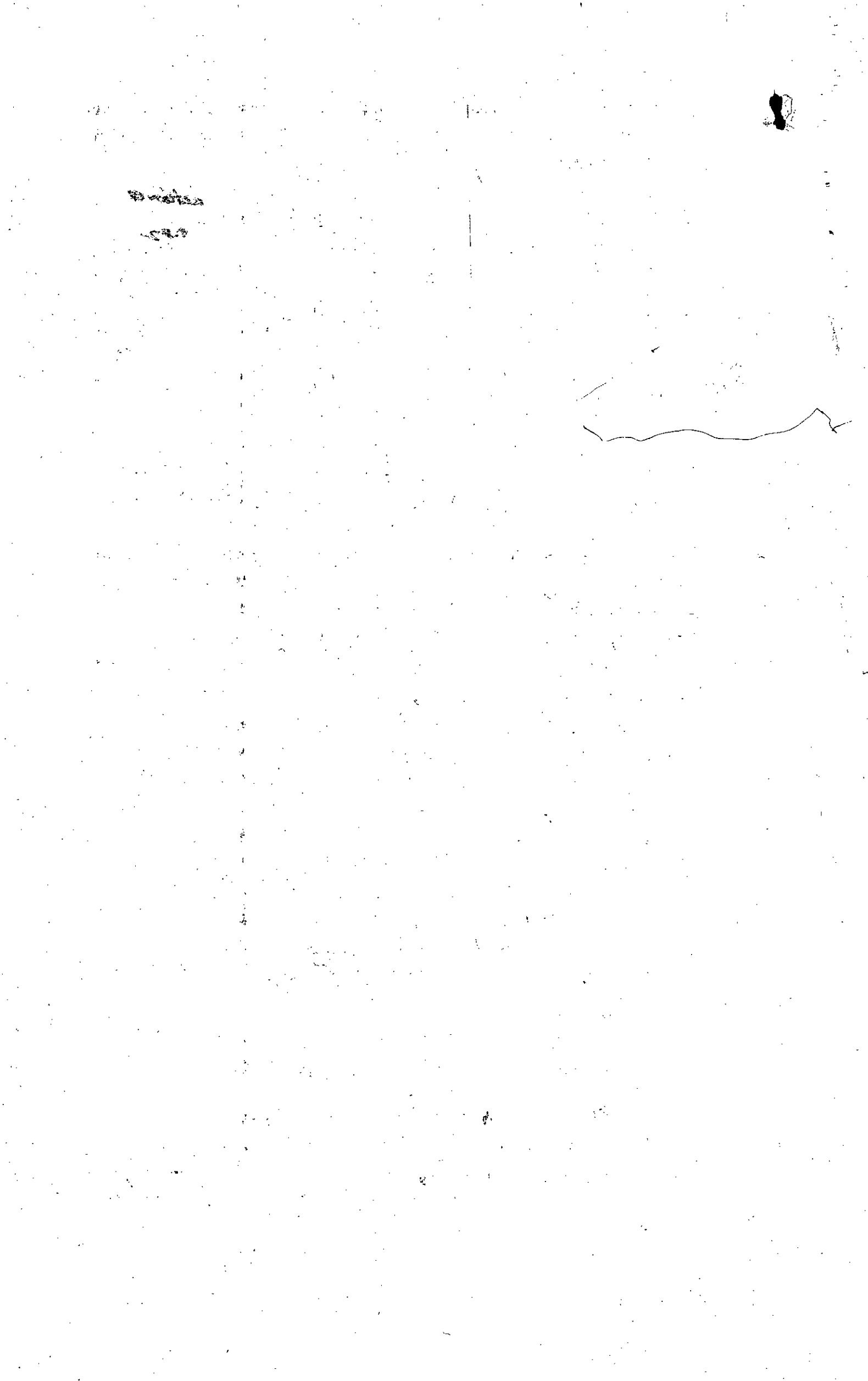
forum/court .For ready reference, copies of diagnostic and treatment papers(available) are annexed as "C".

5. That the respondent No. 1, always remained in her negative activities and efforts against the appellant which has badly suffered the decorum of the school and also owing to that she cannot pay her due attention to the school administration and other important task. Which needs impartial inquiry as the respondent No.2 wrongly supports that too. Which will badly effect the school atmosphere if not timely intervened .

1. That without any lawful justification or fault of the appellant, she has been condemned un heard, and transferred , to GGHS Dargai, just on mala fide intention and ill well, vide the order impugned dated,30/10/2018, passed by respondent No.2, delivered on dated,07/11/2018, being falsely basing to be grounded the action impugned as an administrative one, which the appellant by challenging the same preferred and filed departmental appeal, on dated 14/11/2018, before the respondent No.3, who being competent authority despite sitting aside the same and asking the respondents concerned, No.1 & 2, to stop un due mala fide activities against the appellant, (who is dutiful and obedient in fact to both of them, ie res; 1 & 2), respondent No.3, by good well, endorsed copy of the order impugned on 15/11/2018,while considering departmental appeal of the appellant, though was favourable but the same could not prove favourable being not complied with and disobeyed it .Because due to the same the appellant had become again, on the mercy of the respondents No.1 & 2.Who without any intimation or notice to the appellant , at the most earliest stage have stopped and attached the monthly salary for about 20 days of the month of November ,2018 and in full onward, unlawfully and unconstitutionally , being in violation of Fundamental human rights . Hence the appellant having no alternative efficacious adequate remedy, except to file the instant service appeal on the following grounds among other inter alia .

#### GROUNDS

A. That both the orders, impugned dated 30/10/2018 and stoppage/ attachment of the monthly salary of the appellant, is totally based on mala fide intention and ill well, of the respondent No.1 and 2, while just to spoil the handsome service carrier of the appellant and is against the public interest too. While the endorsement impugned dated 15/11/2018 of the respondent No.3, being not straightaway the sitting a side of the



(4)

order impugned to which the res; No.3, was full competent, was also of no help to the appellant, hence is also liable to be set aside in addition to the order impugned.

- B. That both the order impugned dated 30/10/2018 and <sup>action of</sup> stoppage/ attachment of the monthly salary of the appellant are un authorize being not APPROVED and favoured by the appellate authority/respondent No.3 while referring the departmental appeal of the appellant with the remarks " Request of the appellant may be considered " hence the order impugned has lost its legal value and is no more effective in the eyes of law. While the subsequent letter dated 28/11/2018 was more authentication of the same plea . copy annexed.
- C. That the order impugned dated 30/10/2018 is one of which has been passed on administrative grounds but as required under the Efficiency and Disciplinary rules 1973 and other relevant laws, no show cause notice, either 1<sup>st</sup> or final has been given to the appellant. Neither she has been given any chance of personal hearing, but even, no inquiry has been conducted .Hence the order impugned is also not tenable but liable to be set aside in favour of the appellant on this score.
- D. That the order impugned dt,30/10/2018 has been passed, being an Ex parte and also the action, impugned, has been taken, is on mala fide intention and ill well . So the appellant has been condemned unheard being falls against the standing principle of law and justice. The respondent No.2 , has also misused their official power against the mandate, vested in her and totally acted against the public interest while passing the order impugned, to which she was not entitled and authorized to do so . Hence the same action impugned including the stoppage of salary impugned both are against the law and justice on this score too and liable to be set aside.
- E. That no impartial inquiry was conducted before passing of the order impugned, dt,30/10/2018, except once an inquiry was proposed to be conducted against the appellant through a stranger male person, who accompanied the Miss,, Shaheen bagum SDEO (F) Batkhaila had attended the GGH school Gari usmankhail , but when the male

(5)

concerned did not identify himself , that who he is, the appellant had refused to join the proceeding of the said proposed inquiry . Hence the same was also not conducted on this genuine account and reason.

- F. That the appellant remained obedient to all of her bosses, including the respondents No.1 & 2 and also she remained cooperative to all of her teaching and other colleagues. The appellant being Master of Education while taking the period of her other colleagues and also extra periods of English ,Pashto and Islamiyat etc as a routine, in addition to her own periods and duty of PET, had always been achieved 100% goal and progress. So allegation of disobedience or noncooperation which was orally intimated all were mere a lame excuse. So the same was just based wrongly for passing the order impugned because nothing has in no way proved against the appellant, and therefore she is innocent.
- G. That vide the order impugned dt. 30/10/018, the appellant has been wrongly transferred against a wrong post of Senior PET BPS 16, without proposing any alternative/substitute or counterpart, of the appellant, which is against the posting and transfer policy exist. So the present school of the appellant was left without PET by passing the order impugned. While just recently after lapse of more than 90 days a junior most PET HAVING HARDLY SERVED ONLY A PERIOD OF A YEAR, made as respondent No.5, has transferred PRE MATURE AND WITHOUT HAVING RIGHT OF TRANSFER ,( copy of which is not being handing over to the appellant.) being near and dear to the respondents No.1 & 2, being also an act of irregularity as there is no vacant post of PET, while the appellant has not so for relinquished her charge, keeping in view the remarks and letter of the respondent No.3, being competent superior authority to whom both the respondents NO.1 & 2, are subordinates . Therefore the ACTION AND INACTION OF THE respondents No.1 & 2 are totally against the law and policy and is a committing of gross irregularity, which needs impartial inquiry. However the order impugned being also against the interest of both, public and of the students too, may be set aside in favour of the appellant.
- H. That the departmental appeal of the appellant though was so genuine that by considering the same, the order impugned, could be straight away set aside. However the worthy Respondent No.3 had endorsed vide endorsement impugned, dated 15/11/2018, to the respondent No.2 for the same purpose may be on good well, being alternative of the farmer. How ever the respondent No.2, by disobeying by it, and an other

letter dated 28/11/2018, of respondent No.3, as the same is still pending on her mercy and grace for no valid reason, except to keep the appellant in further agony wrongly against the law and therefore the salary of the appellant in the same un lawful sequence has been stopped in violation of all rules, regulations and policy, and of the fundamental rights too. Which is not sustainable in the eyes of law.

- I. That further argument supporting the instant appeal will be made with due permission of this honourable Tribunal at the time of arguments,

Therefore it is humbly prayed that on acceptance of this service appeal the order impugned dated 30/10/2018 and other if any passed wrongly, for premature and unlawful transferring of the respondent No.5 and letter impugned endorsement of respondent No.3, dated, 15/11/2018, which did not comply with, may graciously be set aside from the date of its issue, with the directions to the respondents No. 2, to release the monthly salary of the appellant from the due date and pay <sup>it</sup> without further hindrance for future. And the respondent No.4 may be directed to arrange inquiry committee and take further initiatives against the respondents No.1 & 2. with further relief in favour of the appellant if available under the law though not specifically prayed for, in the instant service appeal may be granted to the appellant.

Through Counsel

  
APPELLANT

RAHIM KHAN

ADVOCATE

HIGH COURT PESHAWAR

Office; at Distt; Courts DaggarBuner.

Cell= 03439049185

Dated; 01 /02/2019.

Certificate

It is to certify that the entire contents of this service appeal are true and correct and that nothing has been concealed.

  
APPELLANT

7

**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTONKHWA PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2018.

Mst, Shahida Hassan

VERSUS

Head Mistress and others..

**AFFIDIVATE**

I, *Shahida Hassan PET Govt; Girs High School Gari Usman Khail Dargai Distt; Malakand at Batkhaila / APPELLANT*, do hereby solemnly affirm and declare on oath that the entire contents of this service appeal are true and correct. And that neither such like service appeal on the same subject matter or issue has earlier been filed by appellant nor on the same subject is pending before this Honourable Tribunal.

*Sd/-*

Appellant /Deponent.

CNIC = 15401-9784457-6



(8)

**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTONKHWA PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2018.

**Mst, Shahida Hassan VERSUS Head Mistress GGHS Gariusman-khail Dargai and others.**

**ADDRESSES OF PARTIES**

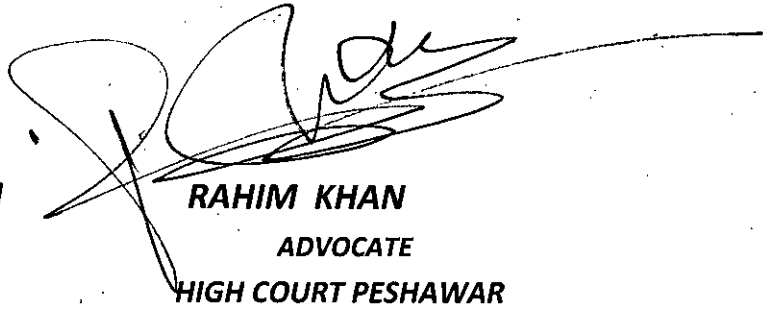
**Mst, Shahida Hassan PET Govt; Girs High School Gari Usman Khail Dargai  
Distt; Malakand at Batkhaila . " APPELLANT**

1. **Head Mistress G.G.H.School Gari Usman Khail Dargai Malakand.**
- 6 **D.E.O Female Malakand at Batkhaila.**
- 7 **Director Elementary & Secondary Education Khybar Pukhtoonkhwa Peshawar.**
- 8 **Secretary Elementary & Secondary Education Khybar Pukhtoonkhwa Peshawar.**
- 9 **Seema (NTS APPOINTEE) PET GGHS KOT Distt; Malakand.**

**"Respondents "**

**APPELLANT**

**Through Counsel**



**RAHIM KHAN**

**ADVOCATE**

**HIGH COURT PESHAWAR**

**Office; at Distt; Courts Daggar Buner.**

**Cell= 03439049185**

**Dated;01 /02/2018.**

(9)

*[Signature]*

**BEFORE THE SERVICE TRIBUNAL KHYBER-PUKHTONKHWA PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2018.

**Mst, shahida Hassan PET Govt; Girs High School Gari Usman Khail Dargai Distt;  
Malakand at Batkhaila .**

**" APPELLANT "**

**VERSUS**

1. Head Mistress G.G.H.School Gari Usman Khail Dargai Malakand.
- 2 D.E.O Female Malakand at Batkhaila.
- 3 Director Elementary & Secondary Education Khyber Pokhtoonkhwa Peshawar.
- 4 Secretary Elementary & Secondary Education Khyber Pokhtoonkhwa Peshawar.

**" Respondents "**

**APPLICATION FOR INTEREM RELIEF IN A SHPE OF SUSPENDING THE OPERATION THE ORDER IMPUGNED END; 4955-59 DATED 30/10/2018, PASSED BY RESPONDENT No.2 WHEREBY THE APPELLANT ~~IS~~ WRONGLY ON MALA FIDE INTENTION AND AGAINST THE PUBLIC INTEREST HAS BEEN TRANSFEED , WITHOUT COUNTER PART ,AGAINST A WRONG POST.**

---

**Respect fully sheweth;**

1. That the service appeal of the applicant /appellant is being filing before this Honourable service Tribunal. And no date in the same is fix .
2. That order impugned dated,30/10/2018 , has been passed , on administrative grounds on mala fide intention and ill well of the respondent s No.1 & 2, by the respondent No.2, as the applicant /appellant has committed no blunder or mistake . As she is dutiful and punctual and also remained obedient to both of the respondents . Hence strong prima facie case is in favour of the applicant/appellant.
3. That the order Impugned dated 30/10/018, passed by respondent No.2, is totally falls against the public interest and also against the interest of the students of both the schools concerned , because the transfer impugned of the applicant/appellant is against the higher/wrong post of BPS 16,while the applicant/appellant is PET B-15. And by proposing no counter part of the applicant/appellant , the present school of the applicant/appellant has been left without PET i.e vacant. So BALANCE OF CONVENIENT is also in favour of the applicant /appellant
4. That the applicant /appellant is a female gender, cardiac patient , depending over five school going children and a jobless Husband . So the present adjustment of the applicant/appellant , in the present school of the applicant /appellant , surely will sustain IRREPAIRABLE LOSS being ailing female teacher , feeding six family members.
5. That further supporting arguments , will be made during the session of arguments with the permission of this Honourable Tribunal .

Therefore it is most humbly prayed that on acceptance of this application the order impugned dated 30/10/2018 may be suspended and further relief to which

(Contd: P-2nd.)



⑦  
10

the applicant/appellant is entitled under the rules may also be granted in favour of the applicant/appellant though not specifically prayed for.

*Spur*

APPLICANT/APELLANT

*[Signature]*

Through Counsel

RAHIM KHAN

ADVOCATE

HIGH COURT PESHAWAR

Office; at Distt; Courts DaggarBuner.

Cell= 03439049185

Dated;12//12/2018.

CERTIFICATE

*Certified that the entire contents of this application are true + correct*

*Spur Applicant/Appellant*

P-11  
Amir

APPOINTMENT ORDER

Mr. Shahida Hussain Qualification .....

D/O. Hussain Gul R/O Kherkai .....

is hereby appointed purely on adhoc/Temporary and as stop-gap arrangements against the vacant post of PST @ Rs. 1605/- P.M plus usual allowances admissible under the rules at Govt; Higher Secondary/High/Middle Schools, GGMS Kalpanai Distt; Buner with effect from 01.04.2016 of

taking over charge subject to the terms and conditions mentioned below:-

TERMS AND CONDITIONS.

1. He/She will be governed by such rules and regulations as prescribed by the Government of the NWFP from time to time.
2. He/She will vacate the post on the arrival of the appointment of trained teacher belonging to the same cadre and service and his services will cease automatically.
3. His/Her services are purely temporary and terminable at any time without assigning any reason or notice and his service will be liable to termination on one month notice from either side. In case of resignation notice his one month pay will be forfeited in lieu thereof.
4. He/She should join the post within a week of this notification, otherwise this order will be deemed cancelled automatically.
5. His/Her original certificate/Degrees should be checked and verified from the concerned Board/University immediately by the concerned DEO/Principal/Headmasters/Headmistress/DEO and verification submitted to this office within one month.
6. The Service Book of the teacher must be checked before handing over charge.
7. He/She should produce health and age certificate from Medical authority concerned before taking over charge.
8. His/Her age should not exceed that 25+5=30 years and no overaged certificate be given charge.
9. Charge reports should be submitted to all concerned within stipulated time.
10. No TA/DA is allowed.
11. He will get himself trained/qualified within one year as per rules.
12. The appointee may be given charge against clear vacancies only and NO over and above appointments be accepted what so ever the circumstances may be.

(GHULAM MUSTAFA)  
DIVL: DIRECTOR OF SECT. EDUCATION  
(S) MALAKAND DIVISION AT GULKADA

Encl: No. 126-64

Dated 13/3/2016 1936.

- Copy to the:-
1. District Education Officer (Male) & (female) Secy; Distt; Agency: MIRAN SWAT .....
  2. Principals/Headmasters/Headmistresses GGMS Kalpanai Buner
  3. District Accounts Officer/Agency Accounts Officer .....
  4. P.S to Mr. Sher Akbar Khan MPA Buner w/r to his own recommendation.
  5. Supdt; Establishment Local office.

Mohd. Khalid  
DDS/DDW/ADEO

DIVL: DIRECTOR OF SECT. EDUCATION (S)  
MALAKAND DIVISION AT GULKADA SWAT.

*[Handwritten signatures and initials]*

Annex "B" P-12

# Alama Iqbal Open University Islamabad



Serial No 237951

Certified that *Ms/Ms* **SHAHIDA HASSAN**  
*Son/Daughter of* **HUSSAIN GUL**  
*Registration No* **09NMD01166** *Roll No* **AC491953**  
*Semester* **Autumn 2012** *having met all the requirements under*  
*the semester system is this day awarded the degree of*

## Bachelor of Arts Group - General

*He/She has secured* **60** *% marks*  
*and has been placed in* **B** *grade*

*attester*

*Ha B*

*M. Anwar*

CONTROLLER OF EXAMINATIONS



HAJIRA BEGUM  
S.D.M BPS-10  
Kharkai Distt: Muzaffargarh

VICE-CHANCELLOR

Result declared on: **August 07, 2013**

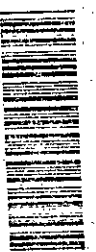
Date of issue: **May 25, 2016**

*12/16*

UNIVERSITY OF MALAKAND  
PAKISTAN



Serial No. 031469



Session 2013-2015

SHAHIDA HASSAN Daughter of HUSSAIN GUL Registration No. 1365621 Private Candidate of Malakand Agency  
having passed the prescribed examination held in Aug-Sep, 2015 under Roll No. 11875 is admitted by the University of  
Malakand to the degree of

**Master of Arts**

in Pashto in Second Division

The examination was taken as a whole

*Attested*  
Controller of Examinations

*[Signature]*  
Countersigned

Result Declared on 08-Dec-2015

Examination Date 04-May-2016

HAJIRA BEGUM  
S.D.M.  
M.A.

*[Signature]*  
In-charge

P-14

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



Serial No. 641211

Name: SHAHIDA HUSSAN  
Father's Name: HUSSAN GUL  
Address: VILL KHARRAI P.O DARGAI

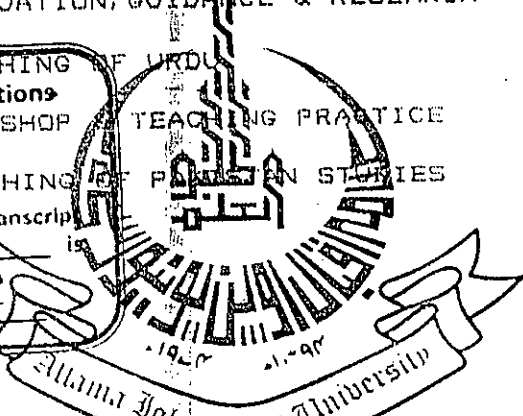
Roll No. AV640245  
Registration No. 09NMD01166  
Final Semester SPR-2014

Tehsil: DARGAI  
District: MALAKAND  
has successfully completed BACHELOR OF EDUCATION (B. ED)

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 13	0513	SCHOOL ORGANIZATION	100	55
AUT- 13	0651	ENGLISH (COMPULSORY)	100	64
AUT- 13	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	58
AUT- 13	0512	PERSPECTIVES OF EDUCATION	100	65
AUT- 13	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	54
AUT- 13	0514	EVALUATION, GUIDANCE & RESEARCH	100	58
SPR- 14	0658	TEACHING OF URDU	100	69
SPR- 14	0655	WORKSHOP ON TEACHING PRACTICE	100	85
SPR- 14	0656	TEACHING OF PAKISTAN STUDIES	100	59

Department Of Examinations  
(Certificate Section)  
**VERIFIED**  
Certificate/Degree/Diploma/Transcript  
bearing Sr. No. 641211 is  
Checked & Found Correct.  
Signatures:-



*Attested for the purpose of verification*

**GHAZALA AF SAR**  
S.S.T (Gen) P.S.C  
G.G.H.S.....G.G.M.S.....

(MUSHAMMAD IQBAL)  
Assistant DPS No. 16  
D.E.O (F) Mkd at Bakkh...

CREDITS: 6

Total Marks / Obtained 900 / 567

Percentage / Grade 63 B

Result Declared on JANUARY 16, 2015

Date of issue JANUARY 20, 2015

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.

Serial No. 066650

P-15  
B

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
TRANSCRIPT



Serial No 159309 Roll No. BC657139  
 Registration No. 09NMD01166  
 Name SHAHIDA HASSAN Enrollment Semester SPR-2015  
 Final Semester AUT-2016  
 Father's Name HUSSAN GUL  
 Address VILL KHARKAI P.O DARGAI  
 Tehsil DARGAI  
 District MALAKAND



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

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 15	0831	FOUNDATIONS OF EDUCATION	100	63
SPR- 15	0837	EDUCATIONAL RESEARCH	100	60
SPR- 15	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	58
SPR- 15	0840	EDUCATIONAL PSYCHOLOGY	100	55
SPR- 16	6505	ISLAMIC SYSTEM OF EDUCATION	100	61
SPR- 16	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	56
SPR- 16	6552	TEXTBOOK DEVELOPMENT - I	100	70
SPR- 16	6553	TEXTBOOK DEVELOPMENT - II	100	61
AUT- 16	0826	ELEMENTARY EDUCATION	100	70
AUT- 16	0827	SECONDARY EDUCATION	100	62
AUT- 16	0828	HIGHER EDUCATION	100	69
AUT- 16	0829	TEACHER EDUCATION IN PAKISTAN	100	64

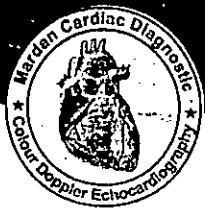
Credit Hours 36  
 Result Declared on OCTOBER 10, 2017  
 Date of Issue OCTOBER 19, 2017  
 Total Marks/Obtained 1200 / 749  
 Percentage/Grade 62 / B

Controller of Examinations

Disclaimer:

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

Anelz "e" P-16  
 R R R



# MARDAN CARDIAC DIAGNOSTIC



## Colour Doppler Echocardiography

Aman Plaza Opposite DIG House Malakand Road, Mardan  
 Ph: 0937-870426 Mob: 0334-8446408

Patient Name: Mrs Jehan Zeb Age: 45 years 23 MAY 2018

Sex: Female Echo Cardiography Report Weight: Adult

Ref-By: Dr.H.Rahman Address: Dargai Malakand.

M-Mode / 2D Measurements	Observed	Normal
Left Vent Diastolic Dimension	4.3	5.7
Left Vent Systolic Dimension	3.0	
Left Atrial Dimension	3.2	4.0
Right Vent Dimension	2.2	2.6
Aortic Root Dimension	2.6	3.7
Inter Vent Septal Thickness	0.9	1.1
Left Vent Post Wall Thickness	0.9	1.1
VSD Size	0.0	---
LPA Size	0.0	---
RPA Size	0.0	---
LV Fractional Shortening %	30.2	---
LV Ejection Fraction %	66.5	---
Mitral Valve Area (2D)	0.0	---

Doppler Study	Gradient mm-HG		Regurgitation
	Peak	Mean	
Mitral Valve Peak	0	0	---
Tricuspid Valve Peak	0	0	---
Aortic Valve Peak	0	0	---
Pulmonic Valve Peak	0	0	---
VSD(G)	0		---
RVSP	0		---
MVA	0.0		---

**Comments on M-Mode / 2D:**

LA / LV / RV are normal in size.  
 Normal valvular structures.  
 Good LV function.  
 No definite segmental wall motion abnormality seen.  
 No pericardial effusion seen.  
 No MVP seen.  
 No ASD / VSD seen.

**Comments on Doppler:**

Normal Doppler Study.  
 Final Impression:  
**NORMAL ECHO STUDY.**

*Handwritten signature: Dr. H. Rahman*

*Handwritten signature: Dr. Hamid ur Rahman*  
 Signature

Dr. Hamid ur Rahman  
 Senior Consultant Cardiologist  
 MARDAN

ETT at MMC

#17 Echo

**Dr. Hamid-ur-Rahman**  
Senior Consultant Cardiologist

هو الشافى

ڈاکٹر حمید الرحمن

Tarkhan Baba Canal Road Bijli Ghar Mardan.  
0334-8446408

ماہر امراض قلب - بلڈ پریشر  
پتہ: ترکھان بابا، کنال روڈ بجلی گھر مردان۔  
فون: 0334-8446408



Name Mrs. Jehan Zah Age 45 yrs Sex F Date 5 23 MAY 2018

Clinical Record

- 1) Tab. Coucor 5mg  
W.C. 1/1 O.D.  
و.ج. ایک بار دن میں
- 2) Tab. Lowplat Plus 75/75  
W.C. 1/1  
و.ج. ایک بار دن میں
- 3) Tab. Sustac 2.5mg  
W.C. 1+1  
و.ج. ایک بار دن میں
- 4) Tab. Rovista 20mg  
W.C. 1/1 O.D.  
و.ج. ایک بار دن میں

B.P. - 130/90  
(before walking)  
Chest - Clear

CVS: - NAD  
No  
R/S Chest  
pain off on  
ESOB on  
exertion.

Pulse - 84/min  
Reg.  
ECG: - ST-T4  
in sup. KV3 → 1/6

Normal  
Echo Study

ETT +ve for  
ischemia.

Hamid-ur-Rahman

Handwritten signature and notes at the bottom of the page.



(18) ~~17~~ B

Dr. Hamid-ur-Rahman  
Senior Consultant Cardiologist

هو الشافي

ڈاکٹر حمید الرحمن

Tarkhan Baba Canal Road Bijli Ghar Mardan.  
0334-8446408



ماہر امراض قلب۔ بلڈ پریشر  
پتہ: تارخان بابا کنال روڈ بجلی گھر مردان۔  
فون: 0334-8446408

Name Mrs Jehan Leb Age 45yrs Sex ♀ Date 1 JUL 2018

Clinical Record

ETT done  
at MMC on  
04/06/2018 →

Neg. for athero-  
sclerotic  
changes  
positive for  
ischemia

(ST-T in infer-  
lat. leads)

Pulse - 84/min  
reg

B.P. - 130/90  
mm Hg

Chest clear

CVS: - NA

1) Tab. Concor 5mg  
ایک بار روزانہ صبح

2) Tab. Lowplac Plus  
ایک بار روزانہ 75/75

3) Tab. Sustac 2.6mg  
ایک بار روزانہ

4) Tab. Simvazef 20mg  
ایک بار روزانہ (صبح)

Rahman

Tab. Agised 5/12  
505

تھریٹ ایک گھنٹہ زبان کے نیچے رکھیں  
(جب سینے میں درد ہو)

Handwritten notes in Urdu, partially illegible.

Adv: Coronary  
Angiography

Handwritten notes in Urdu, including 'CCU' and '8.1/2'.

✓ 8-19 ~~14~~ 2

Associate Professor

# Dr. Mushtaq Ahmed

MBBS, FCPS (Cardiology)  
MMC Teaching Hospital Mardan

w/o Jehan Beg

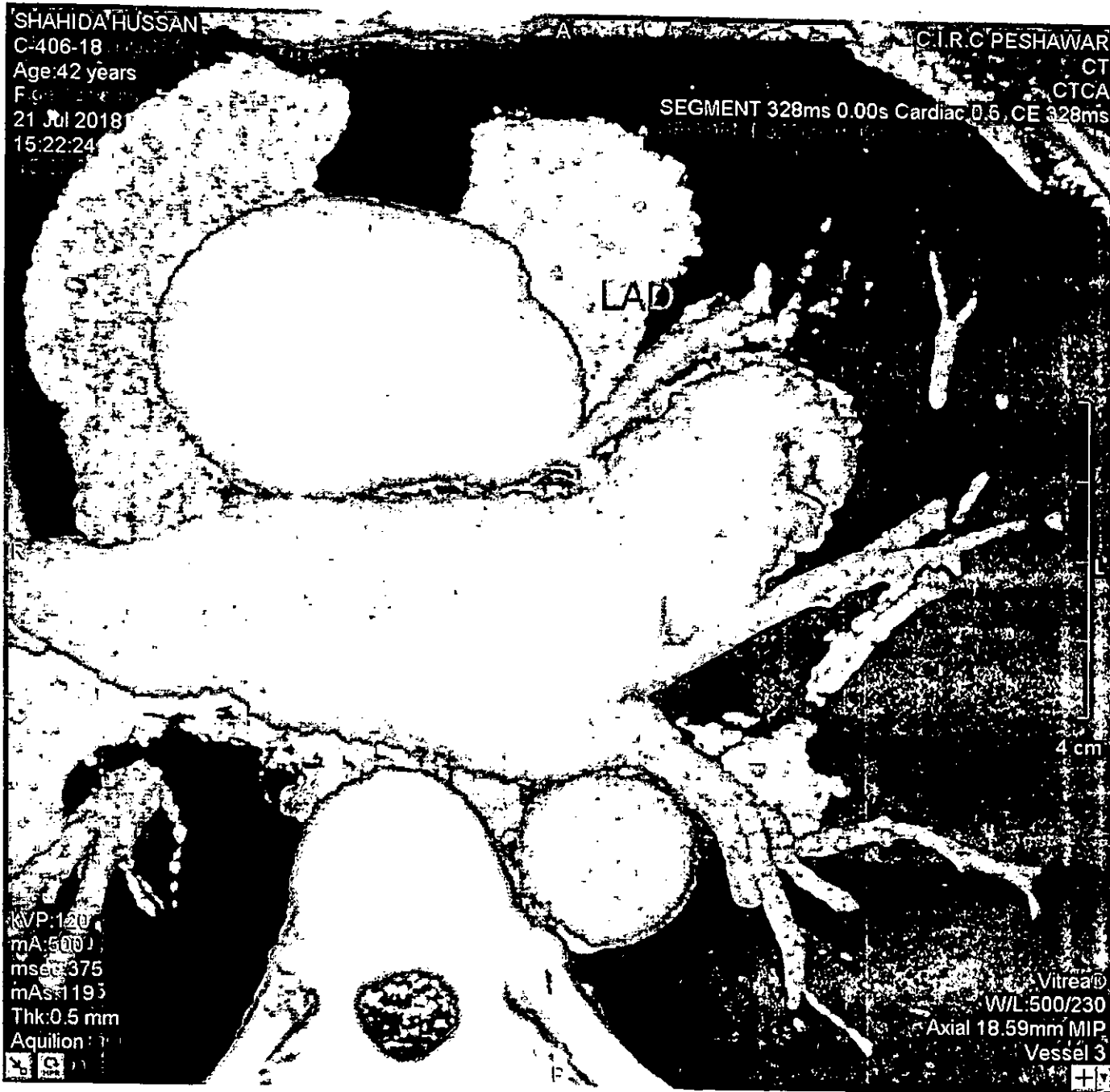
18 OCT 2017

Darja Malakmal

- 19 TB NOAET  
 - 19 A<sub>2</sub> A<sub>50</sub>  
 1 5 3 2 etc  
 - 19 Mohiud  
 - A less than 1  
 P/1 3 1

7

*P-1720*  
*15*



*etc*  
*Dr. J. J. J.*  
*15/07/18*  
*15:22*

Patient Name: SHAHIDA HUSSAN  
Patient ID: C-406-18

Page 3 of 7

**VITAL**  
The image of understanding

P - 18/21 (18) R2



Handwritten notes in Urdu script, including a signature and some illegible text.

Patient Name: SHAHIDA HUSSAN  
 Patient ID: C-406-18

Page 4 of 7

**VITAL**  
*The image of understanding*

P-22 (18) *[Signature]*



*[Handwritten signature]*  
*[Handwritten Urdu text]*

Patient Name: SHAHIDA HUSSAN  
Patient ID: C-406-18

Page 4 of 7



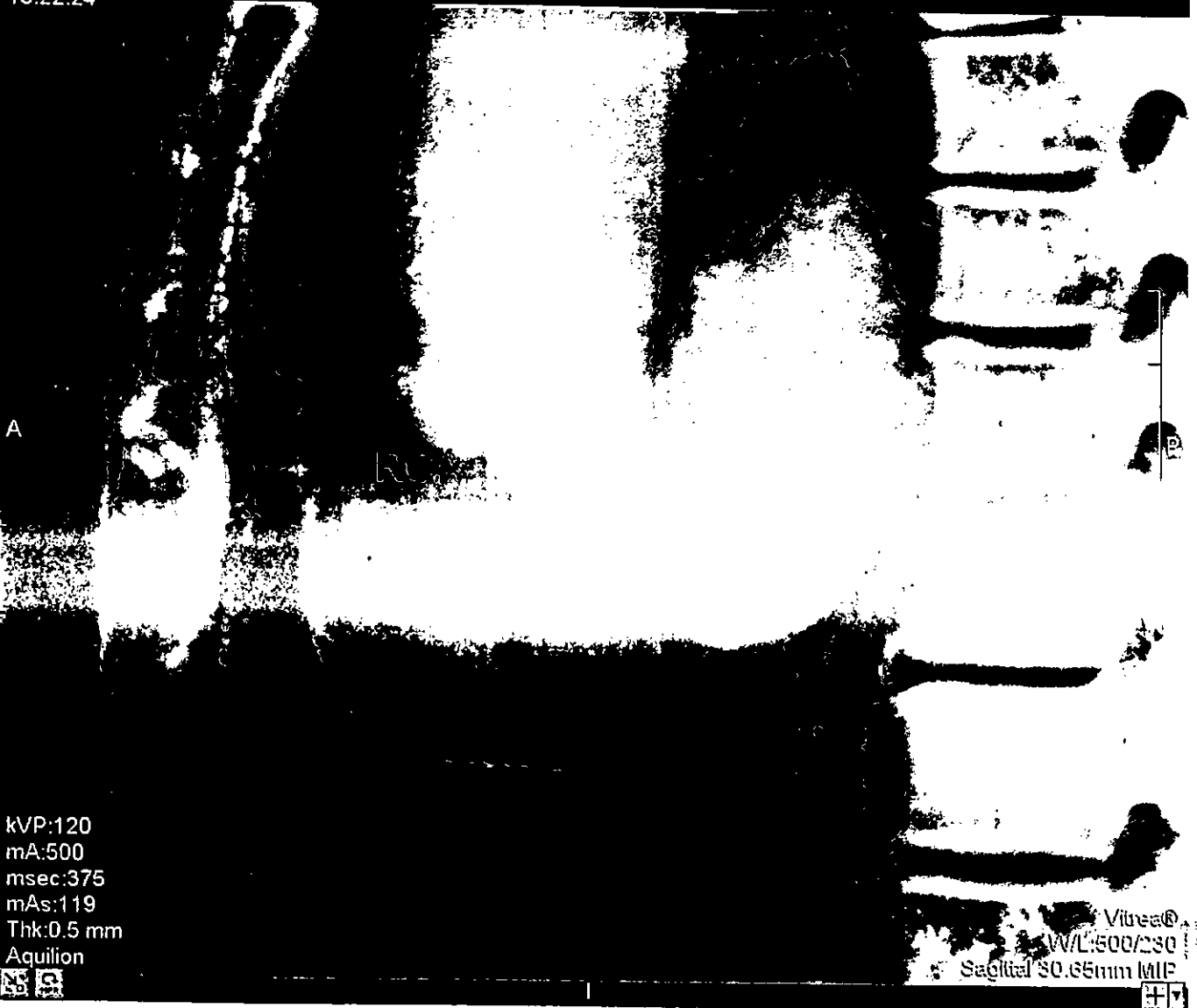
**VITAL**  
The image of understanding

P-200/23  
R2

SHAHIDA HUSSAN  
C-406-18  
Age: 42 years  
F  
21 Jul 2018  
15:22:24

S

C.I.R.C PESHAWAR  
CT  
CTCA  
SEGMENT 348ms 0.00s Cardiac 0.5 CE 348ms



*Handwritten signature*

Patient Name: SHAHIDA HUSSAN  
Patient ID: C-406-18

Page 5 of 7



**VITAL**  
The image of understanding

F-24

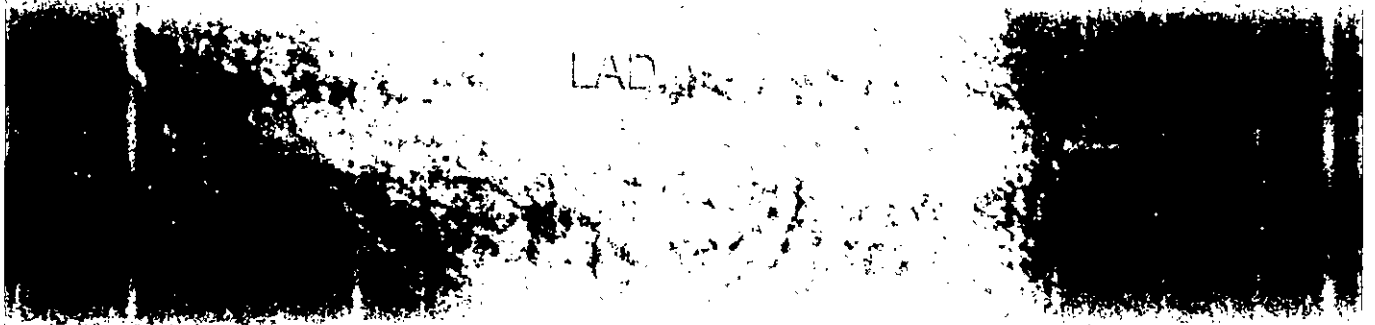
(C) 82

SHAHIDA HUSSAN  
C-406-18  
Age: 42 years  
F  
21 Jul 2018  
15:22:24

C.I.R.C PESHAWAR

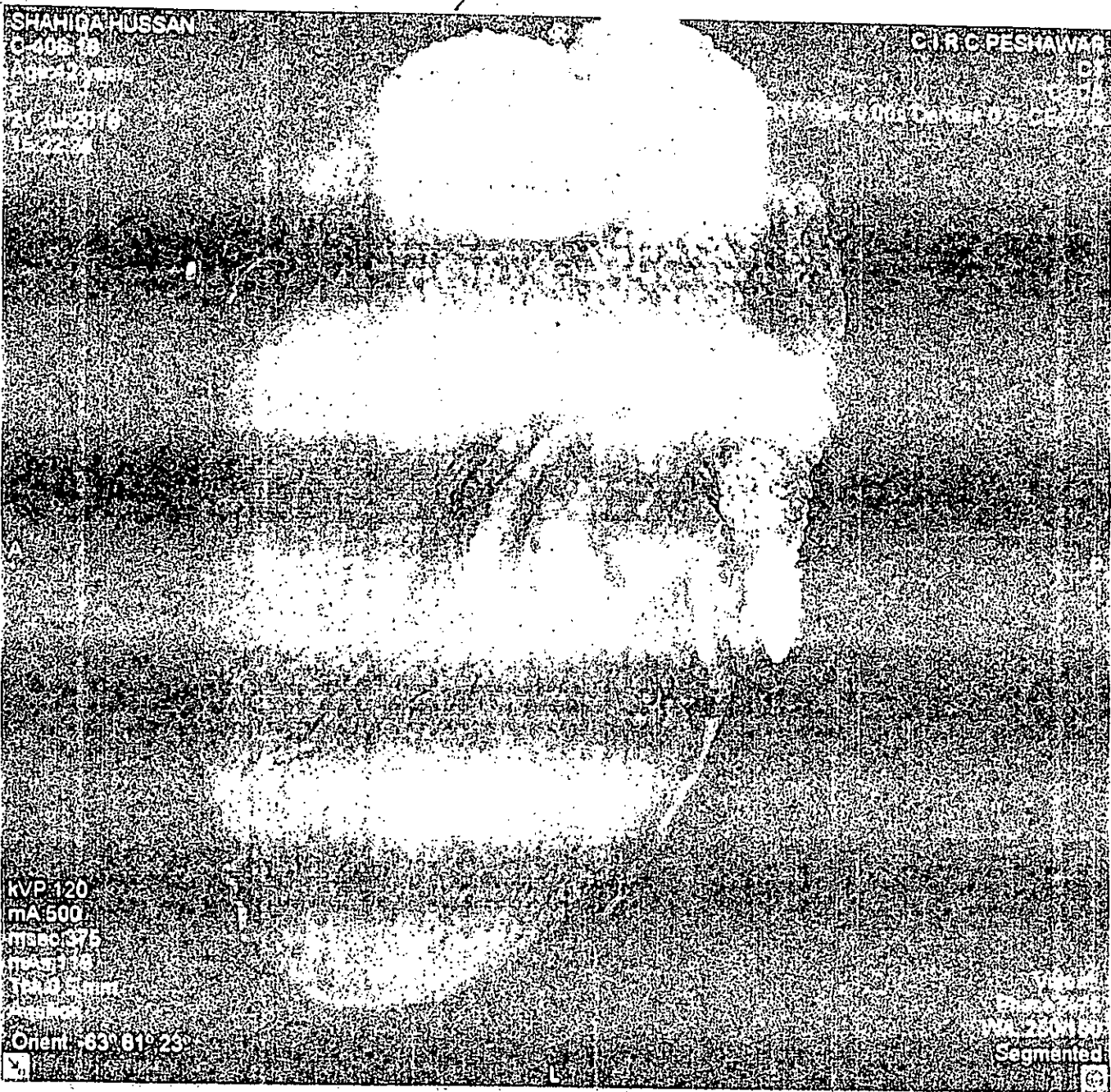
CT  
CTCA

SEGMENT 75% 0.00s Cardiac 0.5 CE 75%



Handwritten notes in Urdu script, including the name 'ع.ح.' and other illegible text.

P-23  
h (circled) m



SHAHIDA HUSSAN  
C-406 18  
18-2-2018  
18-2-2018  
18-2-2018

C.I.R.C. PESHAWAR

KVP: 120  
mA: 500  
mAs: 375  
18-2-2018  
18-2-2018  
Orient: 63° 01' 23"

18-2-2018  
18-2-2018  
18-2-2018  
Segmented

Handwritten signature and notes in Urdu script, including the word 'CTE' at the top.



26  
P-23  
8

CLINICAL IMAGING AND RESEARCH CENTRE KHYBER  
BAZAR PESHAWAR

---

**Patient Information**

Patient ID: C-406-18  
Patient Name: SHAHIDA HUSSAN  
Date of Birth:  
Gender: F

Referring Physician: DR. SHAH SAWAR  
Exam Type: CTCA  
Scan Date: 21 Jul 2018  
Report Date: 7/23/2018

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*[Handwritten signature]*

---

Patient Name: SHAHIDA HUSSAN  
Patient ID: C-406-18



P-27  
-27  
-27

**FINDINGS:**

**LMS: Normal.**

**LAD: Normal.**

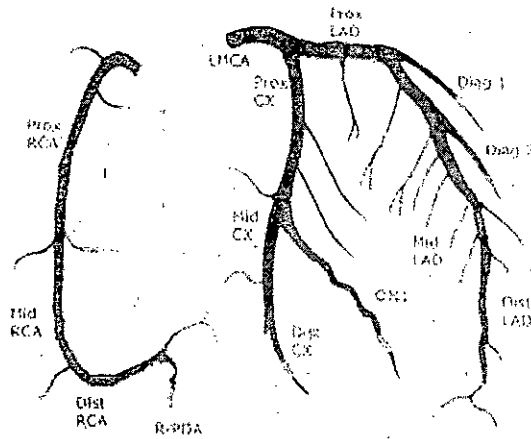
**DIG: No obvious disease.**

**CX: NO flow limiting lesion.**

**OM: Good size vessel. No obvious disease.**

**RCA: Mild disease in mid segment. No flow limiting lesion in other segments.**

**Coronary Tree Diagram**



1. Minimal CAD.
2. Coronary calcium score= 0

*[Handwritten signature]*

**Prof Abdur Rahman Khan  
Consultant Radiologist**

Patient Name: SHAHIDA HUSSAN  
Patient ID: C-406-18



# 1007. Stress Phase ECG Complex Summary

Patient: Shahida Hassan Age: 40 y    Height: NG    Pacemaker: NA    Family: NA Sex: Female    Weight: NG    Smoking: NA    Alcohol: NA	PID: Medication: Test Date: 04-Jun-18, 8:55 AM    Report Date: 04-Jun-18, 9:06 AM
--	---

**Indications:**

**Test Results:**

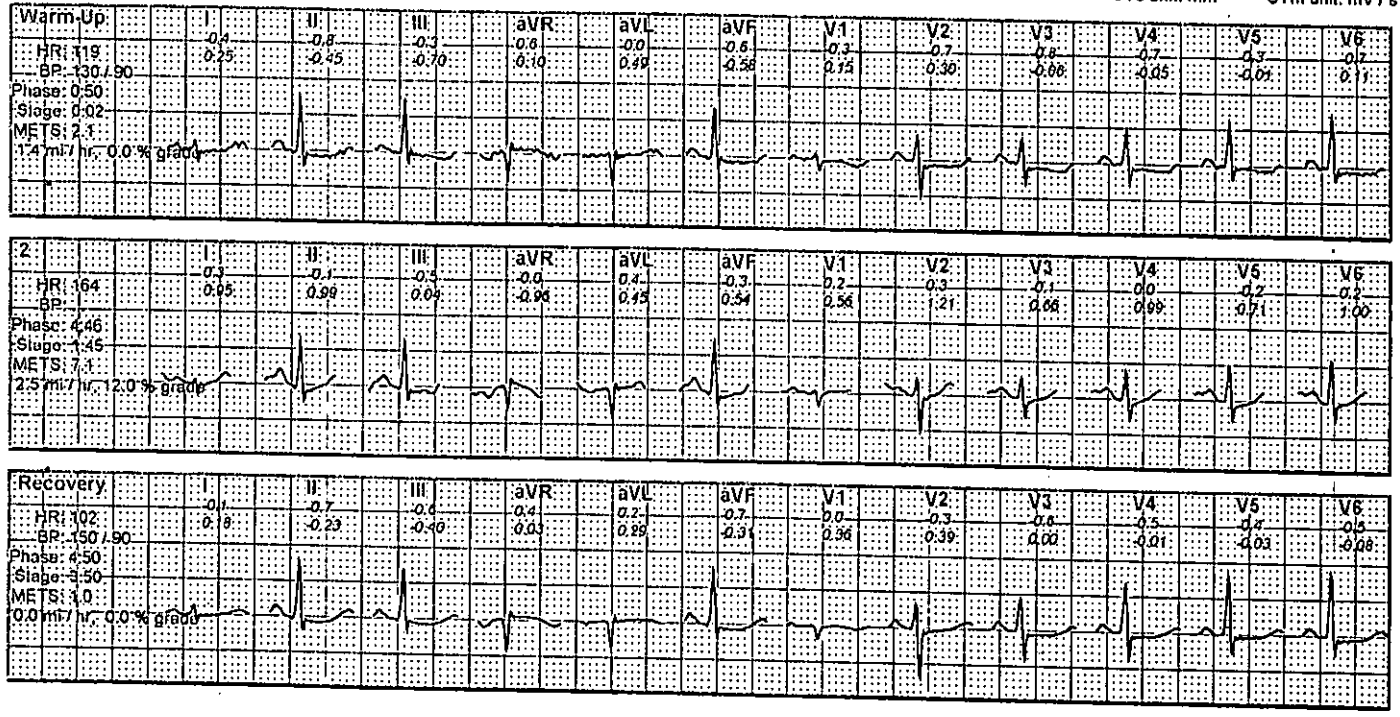
Protocol: Bruce    Device: Treadmill (Trackmaster Treadmill)

Maximum HR: 166 [98 % of THR (170)]  
 Maximum BP: 160 / 90    Maximum DP: 16480  
 Maximum ST: 1.9 mm @ 4:18 [V5]  
 Maximum Load: 2.5 mi / hr, 12.0 % grade [ 7.1 METs]  
 Test Time: 11:13    Exercise Time: 4:57  
 Termination Reason: Patient Request

**Test Details:**

Test Site:    Technician:  
 Test Date: 04-Jun-18, 8:55 AM    Report Date: 04-Jun-18, 9:06 AM  
 Software: QRS Card Cardiology Suite (Error 06) rslfdi.adv (SN: 9999AE0000E0000) rev 4.06 (130128)

Speed 25 mm / s    Gain: 10 mm / mV    ST 80 ms    STe unit: mm    STm unit: mV / s



**Conclusions:** Shahida Hassan exercised on a Treadmill (Trackmaster Treadmill). Her total exercise time was 4:57 minutes during which she achieved a maximum heart rate of 166 BPM, which was 98 % of her age predicted target heart rate of 170 BPM. Ms. Shahida Hassan's resting heart rate was 100. Her resting blood pressure was 130/90. Ms. Shahida Hassan's maximum exercise effort was 2.5 mi / hr, 12.0 % grade [ 7.1 METs]. Her maximum blood pressure was 160 / 90. Her maximum double product was (Maximum HR x Maximum BP = 26560).

*Conclusion*  
 Baseline ECG show BER with 1mm ST depression in Anterior leads V2-V6  
 Peak and <sup>early</sup> recovery shows 1mm ST depression  
 Optimal heart rate achieved.  
 ETT is Negative for Angina.  
 Positive ~~Angina~~ for Ischemia.

Physician's Signature

Date 4/6/18

*[Handwritten signature and notes at the bottom of the page]*

Patient: Shahida Hassan 04-Jun-18, 8:55 AM

PID: Gain: 10 mm/mV, Speed: 25 mm/s, Filter: Artifact, Baseline

HR: 100, PR: 121 ms, QRS: 75 ms, QTc: 424 ms  
BP: 130/90, QRS: 75 ms, QTc: 424 ms

Pre-Test, 0:10 (Supine, 0)



*P-29*

*ECG - 18/06/18*

Patient: Shahida Hassan 04-Jun-18, 9:01 AM

HR: 168, PR: 204 ms, QT: 167 ms

Speed: 655.4 MPH, Load:

PID: Gain: 10 mm/mV, Speed: 25 mm/s, Filter: Artifact, Baseline

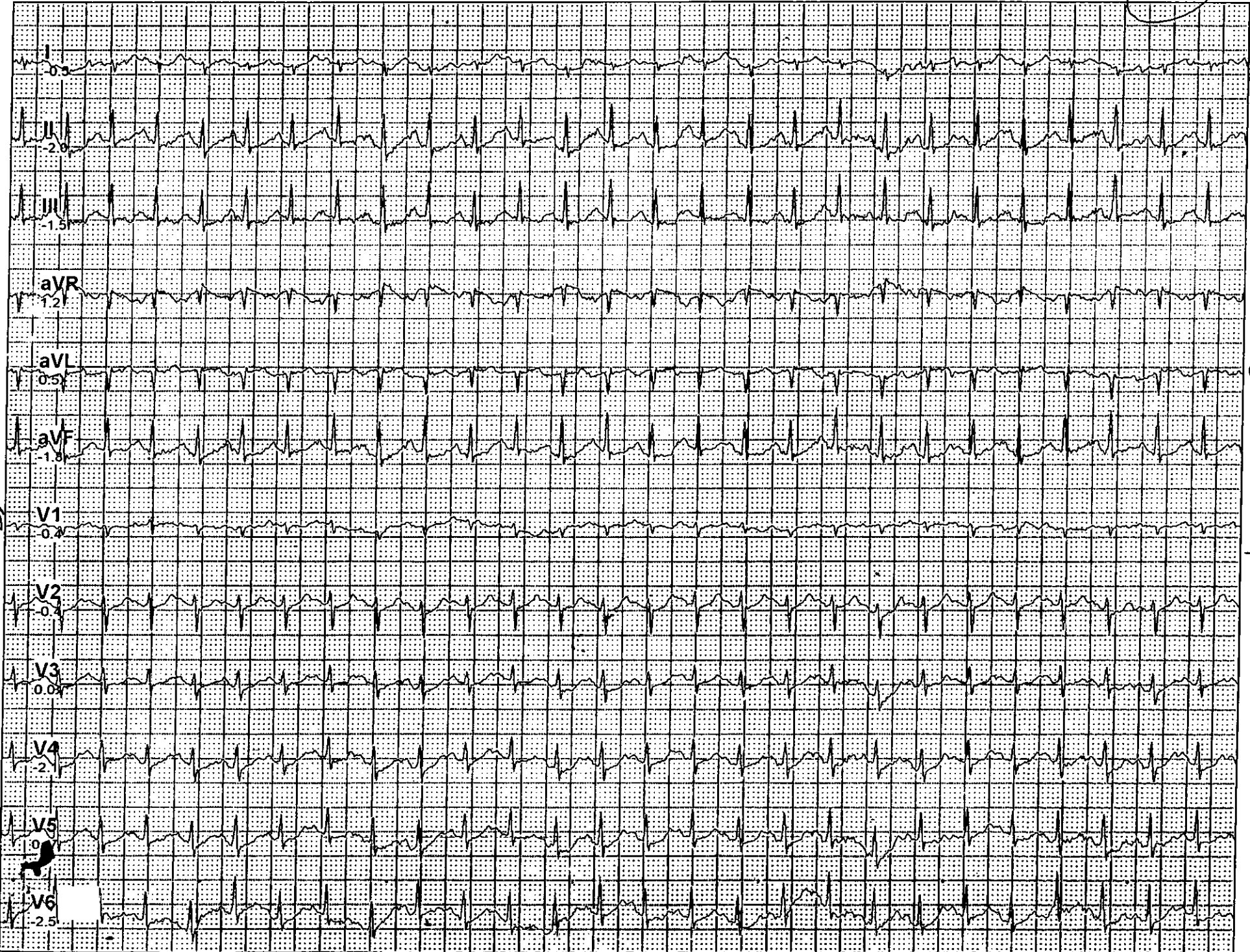
BP: 140/90, QRS: 83 ms, QTc: 279 ms

Exercise: 4:55 (2, 7:55)

*Peak*

*22 R-30*

*Handwritten signature/initials*



Patient: Shahida Hassan 04-Jun-18, 9:04 AM

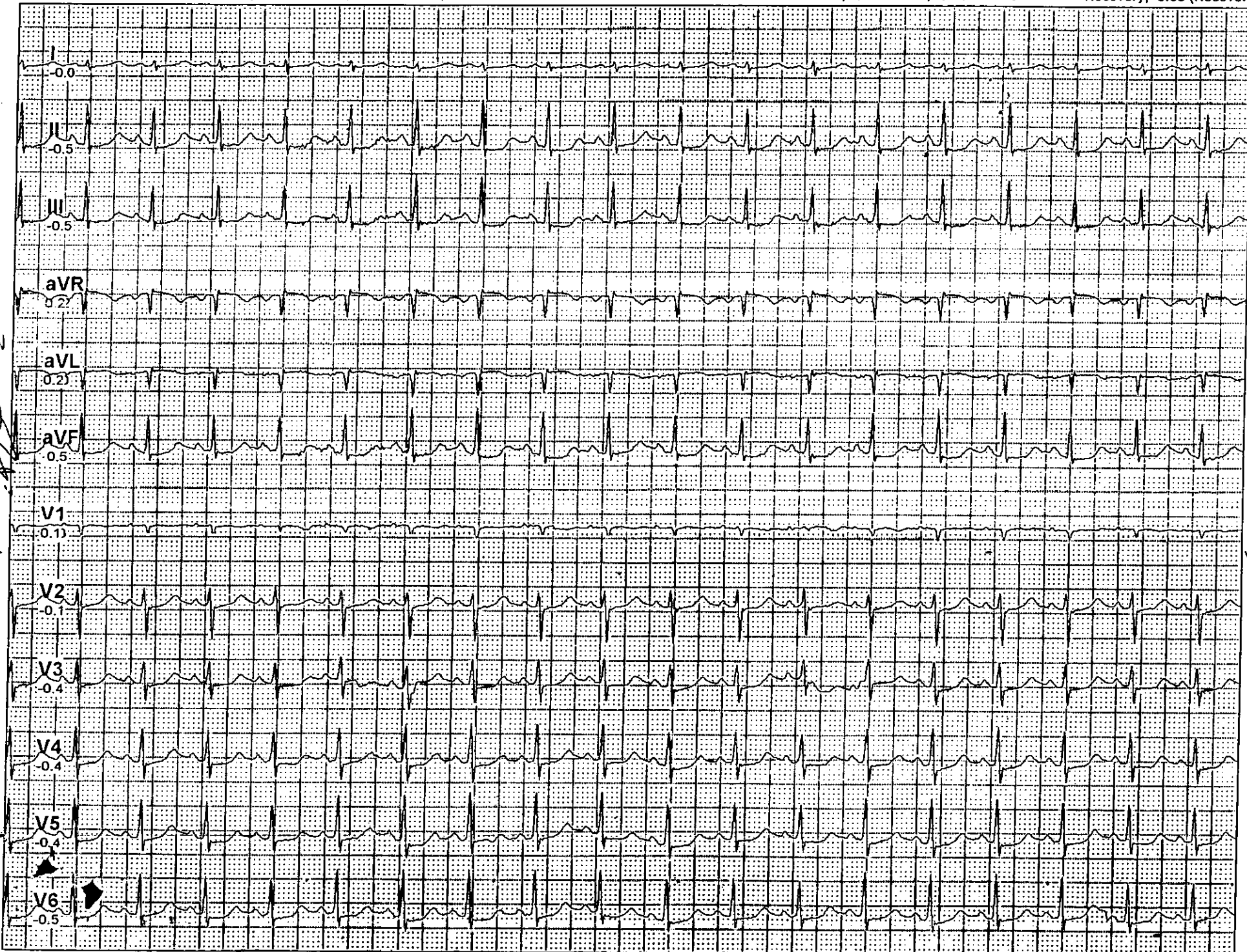
HR: 112, PR: 125 ms, QT: 342 ms

Speed: 655.4 MPH, Load:

PID: Gain: 10 mm/mV, Speed: 25 mm/s, Filter: Artifact, Baseline

BP: 160/90, QRS: 79 ms, QTc: 467 ms.

Recovery, 3:08 (Recovery)



P-39 لاہور (39) لاہور  
محکمہ جناب ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) ملکہ کنڈ بٹھیل

جناب عالی!

گزارش کی جاتی ہے کہ فروپ کی BPS-15 ہے اور

آپ صاحبان نے فروپ کو سینیئر پوسٹ (BPS-16) پوسٹ پر  
پُر انٹرفر کیا ہے۔ ایجوکیشن لاء کے مطابق جو سینیئر پوسٹ  
پر پُر انٹرفر نہیں کیا جاسکتا۔ اسی لیے G-G-HS درجی نہیں  
جاسکی۔ چونکہ یہ فروپ کے لاء (انگ پوسٹ) ہے۔

آپ صاحبان نے جس انکوائری پر میرا پُر انٹرفر کیا ہے  
مجھے ابھی تک اس کے نقول نہیں ملیں۔ جو کہ میرا قانون حق ہے

پرانٹ میرا بی تمام انکوائریوں رپورٹوں کی فولوں کا ہی مجھے ارسا  
کر ہے۔ شکر ہے ہرگز نہ کچھ کاغذات جو میری تعلق ہوگی مصدقہ کارڈ یاں دیکھیے۔

العارلی

(S) 28/11/18

28/11/18

شاید سن PET گورنمنٹ ٹریننگ کالج سکول گھڑی عثمانی ٹیل  
(دو کاپیوں کے ساتھ)

~~Handwritten scribbles~~

گزارش مالی و الزامات مستندہ (بازو) و اس کے تحت بیٹا اور بیٹی

Propriet channel = پورا حق

جناب

مذکورہ ذرا تشریح کی جا رہی ہے کہ میں تعلیم اللہ کے ذریعے بیٹی کی صحت  
 میں گورنمنٹ گھنٹہ شاہی سکول کو کافی عرصے تک ملا رہی تھی اور وہی گورنمنٹ  
 سکول ہے۔ 2017ء تک میں نے اپنی خوار و خردت سے P.T.A سے ملا رہی  
 دوسری دہائی میں بھی شوق سے یہ تعلیمی کام لیتے رہی جب 2018ء میں گورنمنٹ سکول  
 کے طالب علم تیار کر دیا گیا۔ جو درجہ اولیٰ اور سہ ماہی کے درجے کے ہیں۔ اس سے  
 مشورہ فرمیں کہ مجھے P.T.A کے لئے اور P.T.A کے لئے (اختیار) P.T.A کے لئے  
 اور بیٹی کے لئے کلاس کے لئے P.T.A کے لئے دیا گیا۔  
 چونکہ 2018ء میں مجھے دل کا عارضہ ملا تھا تو میں نے تعلیم چھوڑ دی  
 ہے۔ لہذا آپ میری حالت میں نظر ڈالی کریں۔ جس سے میری اور  
 بیٹی کی تعلیم کے بارے میں فیصلہ ہو سکے۔ میں کہ وہ اس سے بہتر  
 کرنے کے لئے طرح طرح کے سوال کرتے ہیں۔ اور انہیں بھی ذمہ داری  
 ہے۔

جناب عالی! سرکاری طور پر قبول سے فائن لینا قانونی طور پر نہیں ہے۔  
 لیکن مشورہ فرمیں کہ مجھے قبول کرنا ہے تاکہ آپ کو یہ  
 فائن لینا اور مجھے دے دو۔ تاریخ اپریل 2018ء میں میں نے مشورہ فرمیں  
 کو 7000 روپیہ دے دی ہے۔ اور ان سے لینا ہے تاکہ ان کے لئے فائن لینا  
 تاکہ قبول کر لیا گیا ہو۔ لیکن انہوں نے اسے رقم کو ایک صوبہ  
 میں چھال دیا ہے۔ اسی لئے میں نے فائن لینے سے انکار کر دیا ہے۔  
 دوسری بات یہ ہے کہ اس بار میں نے فائن لینا نہیں ہے۔ لیکن سرکاری سکول  
 میں اچھے کچھ ہیں۔

اسی طرح سرکاری سکول کی سہولتوں میں بھی میں نے  
 کچھ نہیں کیا۔ کیونکہ کوئی بندہ وغیرہ نہیں تھا۔  
 جناب عالی! جب میں نے کوئی کام نہیں کیا ہے۔ سرکاری سکول میں چارج لینا  
 تو انہیں لینا ہی ہے۔ کہ سکول کے تمام کام میں شامل ہوں۔ جس کو  
 لینا کرتی ہے۔ تو وہ ہر کام میں چارج کر رہی ہیں۔ سارا بیٹا

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شروع کی۔ جب اس وقت اس وقت کے لوگوں میں فکری اور علمی - تو انہوں نے  
 میاں کے ایلوچ کر کے یہی خلاف ~~تعمیرات~~ <sup>تعمیرات</sup> کے نام سے استعمال کیے  
 جو سکول کے بالکل عین میں تھے۔ بلکہ سکول کے باہر بھی خلاف معمول پر یہی ایلوچ  
 تیار کی جاتی تھیں۔ غرض یہ کہ ان وقت کے لوگوں  
 نے وقت کی پابندی نہیں کرتے تھے۔ اس لیے کہ یہاں تک کہ  
 ضلع میں یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 پر یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 جناب عالی! میں نے ان وقت کے عین میں - میں جو یہاں تک کہ  
 میں نے یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 آپ کو دعا گو رہوں گا کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 اور اس کے وقت میں یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ

تو وہاں سے وہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 میں نے یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 چونکہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 واقعہ یہ ہے کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 میں نے یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 میں نے یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ

میں نے یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ  
 کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ

19/11/2018

میں نے یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ یہاں تک کہ

Aneeq "E" P

35

OFFICE OF THE DISTRICT EDUCATION OFFICER(F)MALAKAND AT BATKHELA

OFFICE ORDER:

As recommended by the enquiry Committee Mst:Shahida Hassan PET Government Girls High School Gari Usmani Khel-Tehsil Dargal is hereby transferred to Government Girls High School Dargal against the vacant post of PET in the Interest of public service with immediate effect.

Note:

1. Necessary entry should be made in her original Service book.

(SADIA ILYAS)  
DISTRICT EDUCATION OFFICER,  
(F)MALAKAND T BATKHELA

Endst:No: 4955-59/dated 30/10 2018.

Copy of the above is forwarded to the:-

1. The District Accounts Officer Malakand.
2. The Head Mistress GGHS GU Khel.
3. The B&AO /Accountant of Middle Schools local Office.
3. The Head Mistress GGMS Gul Zada Kalli.
4. The Official concerned.

DISTRICT EDUCATION OFFICER,  
(F)MALAKAND T BATKHELA

HEAD MISTRESS  
G.H.S. Gahri Usmani Khel  
MKD Agency.

Received  
on Date 07-11-2018  
Shahida Hassan

*[Handwritten signatures and scribbles]*

جدت خباب ڈاٹیکم سے ملے گی ایک کسٹم جو یہ خریدیں گے تو اس سے  
پر مسابقت :- خباب 550 زمانہ ملاکتی ہے

معاون :- اسل کے خلاف تیار حکمت نامہ صدر دفتر 30/10  
حضور نے 7/11/2018 انہما سے کر دہ 550 زمانہ ملاکتی ہے

خواب عالی! اسل کے معاون بلا حسب ذیل ہے

1۔ یہ کہ سائیکل اسلام آباد PET سیکل 5 راستہ ہے اور قریب سائیکل  
20 سال سے کسٹم و فونڈی اینڈ فراڈ کے انجام دینی رہی ہے جبکہ  
تاحال سائیکل کے خلاف کوئی حکمت نامہ انضامی کارروائی مکمل نہیں  
کئی لائی جا چکی ہے

2۔ یہ کہ سائیکل کسٹم فیصل شہر PET اینٹی سرکٹنگ کے علاوہ کئی دیگر  
سٹیٹس کے وجود میں ہیں اور کئی سٹیٹس اسلام آباد و گلبرگ کی کسٹم  
کو بھی لائی جا چکی ہے اور کئی سٹیٹس لائی رہی ہیں

3۔ یہ کہ سائیکل درج بالا شمالی تعاون کو لے کر اسل کے اور اسے سائیکل اسٹور  
کئی دلچسپ اور سکرو جوں کی ویسٹ رضفا سے انجام دینی رہی ہیں  
حالانکہ سائیکل حل کی رضفہ اور کئی کئی ماہ سے سائیکل کی توجہ  
بے روزگار ہونے کے سبب بھی سائیکل سے depend کرتی ہے

4۔ یہ کہ سائیکل اپنے اخراج یا پلانٹ کے اندر اسل کے اخراج کی obedient اور اسٹور  
Colleagues سے Cooperate کرنے کسی بھی جو جائز شکایت کی توقع نہیں ہے

5۔ یہ کہ سائیکل کے ممبر اسل کے بلاوجہ سائیکل سے ملے اور ان کے سیدھا کر بلا سب سے  
دو سکول کے باہر سیاسی و سماجی طور پر اسل کے اندر سائیکل کے خلاف محاذ بندی  
قائم کر کے سائیکل اسل کے ممبروں کی رضفہ میں چلے گئے ہیں

6۔ یہ کہ موجودہ سکول کے ممبروں کو فونڈی یا کر تدریسی سے بلاوجہ سائیکل کی تدریسی حکمت نامہ 550  
نہانہ ملاکتی ہے تدریسی کی بنیاد پر بلا تدریسی سائیکل کے Administrative طور  
پر کراچی ہے جو ہر گز قابل بحالی نہیں ہے بلکہ قابل ختم و جوہرات بلا و زیل ہے

① سائیکل کو بلا Center/Institution یا تبادلہ PET تبدیل کرنے کو اجازت دینا اور PET سے ملنے  
سائیکل کی تدریسی سائیکل PET سیکل 5 اور کئی دیگر سائیکل کی موجودہ اینڈ کسٹم طرز  
سے متاثر کرنے سائیکل کو اسل کے اندر کئی سائیکل کو نقصان پہنچانے کا اقدام ہے جو مفاد عامہ کے  
خلاف ہے

② اسل کو اسل کے ممبروں کو سائیکل کو نقصان پہنچانے کا اقدام ہے جو مفاد عامہ کے  
خلاف ہے

کھیل (P.E.T)

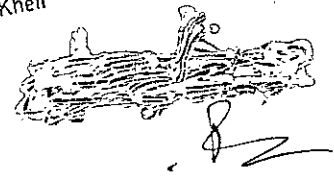
کلاس اول (P.E.T)

8	7	6	5	4	3	2	1
6th A حضرت	9th اصول	7th B P.T.			10th اصول	9th P.T.	
=	=	8th B P.T.			=	9th اصول	فیل
					10th P.T.		د ن
		7th A P.T.	8th A P.T.		اصول		حضرت
							م
							لست

ڈیوٹیوں :- ① ڈسپن اینج

- ② اسمبلی اینج
- ③ لیورنس اینج

HEAD MISTRESS  
G.H.S. Garhi Usmani Kheil  
MKD Agency.



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*Awaraz - H*  
8-9  
-F

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) MALAKAND AT BATKHELA

OFFICE ORDER:

As recommended by the enquiry Committee Mst:Shahida Hassan PET Government Girls High School Gari Usmani Khel Tehsil Dargai is hereby transferred to Government Girls High School Dargai against the vacant post of PET in the interest of public service with immediate effect.

Note:

1. Necessary entry should be made in her original Service book.

(SADIA ILYAS)  
DISTRICT EDUCATION OFFICER,  
(F) MALAKAND T BATKHELA

Endst: No: 4955-59 / dated 30/10 2018.

Copy of the above is forwarded to the:-

1. The District Accounts Officer Malakand.
2. The Head Mistress GGHS GU Khel.
3. The BSAO / Accountant of Middle Schools local Office.
3. The Head Mistress GGMS Gul Zada Kalli.
4. The Official concerned.

DISTRICT EDUCATION OFFICER,  
(MALAKAND) T BATKHELA

*DEED (F) Malakand*  
*Pr. crewing*  
*the order*  
*Consider the*  
*Date: 07-11-2018*

*Other file*  
*J.P.B.*  
*(F)*

*Received on 19/11/2018*

Director of Education  
Malakand Division  
Fakhtanawa Peshawar



P- (28) 40  
P2

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA,  
PESHAWAR**

No. \_\_\_\_\_/A-25/complaint/PETs/DPEs/Vol-IV.  
Dated Peshawar the: 28/11/2018.

To

The District Education Officer,  
(Female) Malakand.

Subject: - **APPEAL**

I am directed to refer to the subject cited above and to enclose herewith a copy of application in respect of Mst. Shahida Hassan PET GGHS Garhi Usmani Khail District Malakand which is self-explanatory for further necessary action.

I am further directed to ask you to submit detail report/views & comments in the light of attached application of the said teacher to proceed further into the matter please.

*Sd/-*

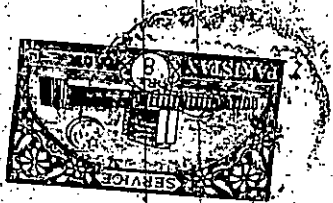
ASSISTANT DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst No. 154

Copy of the above is forwarded to:-

1. Mst. Shahida Hassan PET GGHS Garhi Usmani Khail District Malakand.
2. PA to Director E&SE local Directorate.

*[Signature]*  
ASSISTANT DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar



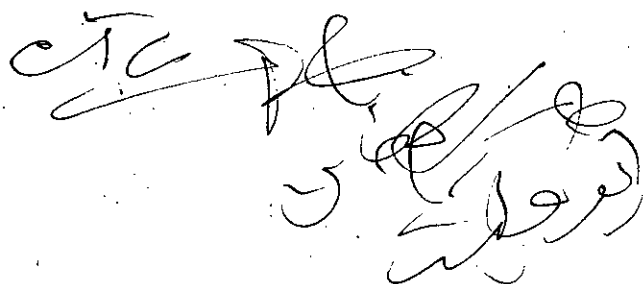
P-41 & P-~~42~~ ~~43~~ ~~44~~ ~~45~~ ~~46~~ ~~47~~ ~~48~~ ~~49~~ ~~50~~ ~~51~~ ~~52~~ ~~53~~ ~~54~~ ~~55~~ ~~56~~ ~~57~~ ~~58~~ ~~59~~ ~~60~~ ~~61~~ ~~62~~ ~~63~~ ~~64~~ ~~65~~ ~~66~~ ~~67~~ ~~68~~ ~~69~~ ~~70~~ ~~71~~ ~~72~~ ~~73~~ ~~74~~ ~~75~~ ~~76~~ ~~77~~ ~~78~~ ~~79~~ ~~80~~ ~~81~~ ~~82~~ ~~83~~ ~~84~~ ~~85~~ ~~86~~ ~~87~~ ~~88~~ ~~89~~ ~~90~~ ~~91~~ ~~92~~ ~~93~~ ~~94~~ ~~95~~ ~~96~~ ~~97~~ ~~98~~ ~~99~~ ~~100~~

Job Description for PETs/DPEs Middle /High / Higher Secondary Schools

(6-12) Classes in Khyber Pakhtunkhwa

1. DPEs' shall lead the physical Team (especially in Higher Secondary School as they are the most experienced and senior Persons) and shall work in collaboration with the PETs and other related persons/ teachers, to arrange physical activities for the character, physical and mental development of students and to inculcate the habits of life skills among the students.
2. DPEs /PETs shall be available to conduct the morning assembly along with other staff.
3. Availability of all teaching / none teaching staff in Morning Assembly is compulsory as it is joint session/event of the whole school (Students, Teachers etc) as different messages are conveyed, related to character building of the students through this forum.
4. All Students (6-12) shall be available in the morning Assembly (whereas feasible in the schools).
5. All The DPEs /PETs shall teach the subject of Health and Physical Education and shall perform practical work /exercises related to HPE.
6. All Kinds of activities ( mentioned in Sports Guide Books of E&SE ) shall be arranged by the Physical Education Staff without any excuses and P.T Squad shall be available at every time in the school.
7. Scouting activities shall also be carried out as per spirit / instruction of scout organization.
8. Bazm e Adab activities should be carried out regularly on monthly basis (last Working day) as per instructions of Directorate of E&SE which has already been circulated to all schools in Khyber Pakhtunkhwa.
9. DPEs/PETs shall be Ground masters and available at grounds to support Principals /Headmasters in administration, especially at morning time to check late comers and to check students' uniform / bags etc. They will keep a close eye on the students and outsiders, entering the school throughout the working hours.
10. DPEs/PETs shall have to maintain up-to-date and transparent record of all kinds of articles / items. All Items purchased, related to sports / co-curricular activities shall be entered properly on stock registers and shall be issued to all In-charges on issue registers. The issued Items ( in whatever conditions / status) shall be collected from concerned In-charge at the end of activities, for store record. All registers / records (Scout, sports, activities carried out etc) shall be signed by Principal / Headmaster concerned.
11. DPEs /PETs shall prepare an annual plan of all activities to be carried out in academic year with the approval of head of school.
12. The DPEs/PETs shall keep contact with other organization /Sports department etc for development of sports culture in the schools.
13. DPEs / PETs shall be highly disciplined, Role Model for students and avoid harsh/negative attitude and shall create friendly environment in the school where each student shall express their ideas / expression in free environment as expected from nation Builder (Father, Brother Or Teacher).
14. More attention should be given on character building, inculcating sense of responsibility in students and preparation for future responsibilities in daily life.

**Note: All other sports / character building assignments / responsibilities assigned by the principal / Headmaster regarding the character, Life skill, physical and mental development of students shall be part of their Job description.**

etc  


F- 2007-42  
82

*[Handwritten signature]*

*Eight days pay*

<p>           Salary            Date: 01/11/2018            Amount: 11,259.00            Description: PAYS AND ALLOWANCES            2247-6000 Relief All 2018 10%         </p>	<p>           Received            Date: 01/11/2018            Amount: 11,259.00            Description: PAYS AND ALLOWANCES            2247-6000 Relief All 2018 10%         </p>	<p>           Date: 01/11/2018            Amount: 11,259.00            Description: PAYS AND ALLOWANCES            2247-6000 Relief All 2018 10%         </p>	<p>           Date: 01/11/2018            Amount: 11,259.00            Description: PAYS AND ALLOWANCES            2247-6000 Relief All 2018 10%         </p>
<p>           Total Deductions            Amount: 0.00            Description:         </p>	<p>           Total Deductions            Amount: 0.00            Description:         </p>	<p>           Total Deductions            Amount: 0.00            Description:         </p>	<p>           Total Deductions            Amount: 0.00            Description:         </p>

Date: 01/11/2018  
 Amount: 11,259.00  
 Description: PAYS AND ALLOWANCES  
 2247-6000 Relief All 2018 10%

Date: 01/11/2018  
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Date: 01/11/2018  
 Amount: 11,259.00  
 Description: PAYS AND ALLOWANCES  
 2247-6000 Relief All 2018 10%



حکومت پاکستان

قومی شناختی کارڈ

15401-9784/57-6



نام : شاہدہ حسن

جنس : عورت

شوہر کا نام : جہانزیب خان

شناختی علامت : کوئی نہیں

تاریخ پیدائش : 02/03/1975

عثمان یوسف مبین

دستخط حامل کارڈ

دستخط رجسٹرار جنرل

Handwritten signature and stamp

درجہ پندرہ کرنی، دا کمانڈر کرنل، میں نے اس کی اطلاع



سنگھل پتہ: ایضاً

423388  
پاکستانی سر

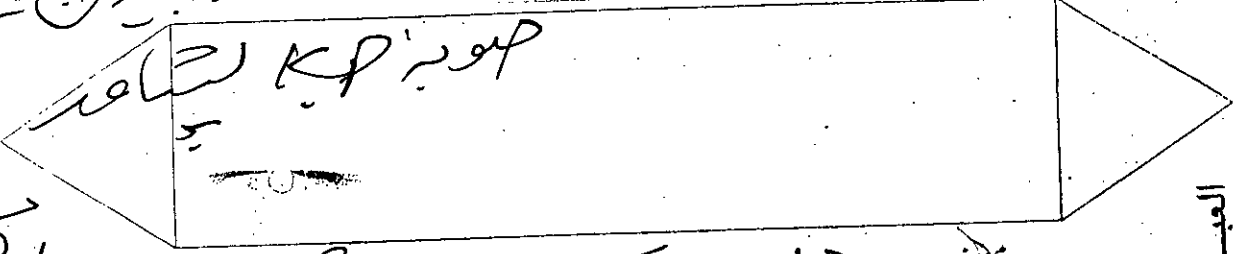
تاریخ اجراء: 19/05/2016 تاریخ ترمیم: 19/05/2026

گشتہ کار پٹے پر قریبی لیٹر بکس میں ڈال دیں



Handwritten signature in Urdu script, appearing to read 'محمد رفیق' (Muhammad Rafiq).

# بعدالت خبر کی توثیق اور سروکار سے سبوتاغ پر مبنی



مقدمہ 12  
 مقدمہ جس میں درخواست گزار نے اپنے  
 دعویٰ سرحد اسیل  
 جوڑنے کے لئے درخواست کی ہے۔  
 نام کا  
 2018ء پنجاب (اعلانہ طور پر) سندھ

## باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام کے صاحب محترم کو مطلع کیا گیا کہ جس میں درخواست گزار نے اپنے مقدمہ کی توثیق اور قبول دعویٰ اور اقبال دعویٰ اور بصورت ڈگری کرنے اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور قبول ہوگا۔ و دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر تو وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 12 ماہ 18  
 العبد گویش العبد

بمقام KP سبوتاغ کے لئے منظور ہے۔  
 Attested & Accepted  
 Advocate High Court  
 Peshawar at Dist Courts Daggar

العبد  
 العبد  
 کوئی اختیار حاصل نہیں ہوگا۔  
 2544826-10451-KMCA-1541-9



28

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA,  
PESHAWAR**

**NOTIFICATION**

Muhammad Uzair Ali, District Education Officer (Male) Malakand, is hereby appointed as Inquiry Officer to conduct enquiry regarding the appeal/complaint lodged by Mst. Shahida Hassan PET GGHS Garhi Usman Khel District Malakand (copy attached).

The Inquiry Officer is requested to probe in to the matter and submit detail inquiry report alongwith clear cut recommendation to this Directorate within 5 days positively please.

**DIRECTOR**

hkh-8-72

Endst: No. \_\_\_\_\_/A-25/Vol-IV/Complaint of PETs/DPEs Dated Peshawar the: 22/2/2019.

Copy of the above is forwarded to the:

1. Muhammad Uzair Ali, District Education Officer (Male) Malakand.
2. District Education Officer (Female) Malakand.
3. Principal, GGHS Garhi Usman Khel District Malakand.
4. Mst. Shahida Hassan PET GGHS Garhi Usman Khel District Malakand.
5. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.

m  
Assistant Director

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

mc

22/2/19



جناب والا: چونکہ 30 اکتوبر 2018 کو DEO سارہ ایس کا تدارک میں بوبیر ہو گیا تھا۔ اس کی تلافی کے لیے ڈی ایچ او نے ڈی ایچ او کو ایڈوائس دی ہے کہ مالاکنڈ ڈی ایچ او کو ایڈوائس دی جائے۔  
 ڈی ایچ او کی خدمت میں آج کی اپیلوں DEO امیدہ صاحبہ کو بھیج چکی ہوں۔ جسکی تفصیل یہ ہے۔  
 اپیل نمبر 1: اپیل اول میں 9-11-2018 کو آئی جی میں ہائی وولٹیٹی تھی۔  
 اپیل نمبر 2: اپیل اول نمبر 2021 مورخہ: 14-11-2018 پر بھیج چکی ہوں۔  
 اپیل نمبر 3: اپیل اول نمبر 2082 مورخہ: 22-11-2018 پر بھیج چکی ہوں۔  
 اپیل نمبر 4: AD مورخہ 28-11-2018 پر بھیج چکی ہوں۔

جناب عالی: اسکے بعد ڈی ایچ او پر جناب ڈی ایچ او ڈی ایچ او نے لکھ کر DEO Female مالاکنڈ کو واپس ریفر کر دیا مورخہ: 15-11-2018۔  
 پر لیکن DEO امیدہ صاحبہ نے میرے سارے اپیل کو خارج کر کے میری جگہ پر ایک PET NTS کا جواز کیا۔  
 جناب عالی: آپ صاحبان کے خدمت میں اپیل بھیج چکی ہوں۔ جسکی ڈی ایچ او نمبر 890 مورخہ: 14-11-2018 چاروں دوسری ڈی ایچ او نمبر 313 مورخہ: 28-11-2018 ہے۔

جناب عالی: آپ صاحبان کی طرف سے ایک لٹر موصول ہو چکی ہے جسکی Ends No. 154 ہے۔ اس میں آپ صاحبان نے DEO صاحبہ کو کہا گیا ہے کہ اس کیس کے بارے میں Detail Report, View and Comments ڈی ایچ او کی رپورٹ کو ارسال کرے۔  
 جناب والا: DEO امیدہ صاحبہ مالاکنڈ سے میں بذات خود شاہدہ حسن PET اس سے ملنے کے لیے Office Balkhela آئی ہوں۔ DEO امیدہ صاحبہ نے ان سب ایپلوں سے انکار کر کے مجھے کہا گیا کہ نہ کوئی اپیل شاہدہ حسن PET کی طرف سے آئی ہے اور نہ ڈی ایچ او کی طرف سے کوئی لٹر آیا ہے۔  
 جناب عالی: پیڈ مسٹریس یا سیمین بیگم نے مجھے برڈن سے سکول سے نکالا حالانکہ میں نے اسی تک چارج نہیں دیا گیا ہے۔ لہذا آپ صاحبان کی خدمت میں لٹر بھیجی جاتی ہے کہ میرے حال پر رحم فرما کر مجھے اپنے سکول گڑھی عثمان خیل میں بحال کی جائے۔ دعا گو رہوں گی۔

*(Signature)*

PET شاہدہ حسن

گورنمنٹ گرلز ہائی سکول گڑھی عثمان خیل  
 تحصیل وردی ضلع مالاکنڈ

مورخہ: 2-2-2019

ADDE  
 For enquiry  
*(Signature)*  
 11/27/19

PERVA Malikawat  
 Basu SS  
 10 min call  
 put up a  
*(Signature)*  
 11/27/19

D/S  
 DEO (M) Malikawat  
 Uzaib Ali may be  
 Mohi S...  
 11/27/19



The  
**PESHAWAR HIGH COURT**  
Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.



Exch: 9210149-58

Off: 9210135

Fax: 9210170

[www.peshawarhighcourt.gov.pk](http://www.peshawarhighcourt.gov.pk)

[info@peshawarhighcourt.gov.pk](mailto:info@peshawarhighcourt.gov.pk)

[phcpsh@gmail.com](mailto:phcpsh@gmail.com)

No. 1210 /HRC

Dated Peshawar, the 22 / 3 / 119

To

Mst. Shahida Hassan D/O Hussain Gul,  
R/O Govt. Girls High School, Usman Khel,  
Tehsil Dargai, District Malakand.

Subject: COMPLAINT/APPLICATION (#17366)

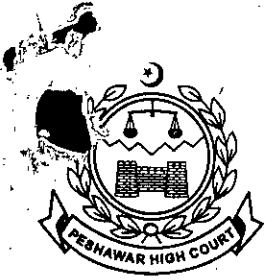
Memo:

Reference to your complaint/application on the subject noted above, and to inform you that you may provide the attested copies of the decisions passed by Service Tribunal and hon'ble Peshawar High Court, Malakand Bench, for further necessary action, please.

Director,

Human Rights Cell

Fax No. 091-9210728



The  
**PESHAWAR HIGH COURT**  
Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58  
Off: 9210135  
Fax: 9210170

www.peshawarhighcourt.gov.pk  
info@peshawarhighcourt.gov.pk  
phcpsh@gmail.com

No. 1192 /MRC

Dated Peshawar, the 21-3-19

To

The Registrar,  
Service Tribunal, Peshawar.

Subject: COMPLAINT/APPLICATION (# 17614)

Dear Sir,

I am directed to forward herewith a copy of the subject complaint/application submitted by **Mst. Shahida Hassan**, for necessary action and disposal at your end, please.

Director,  
Human Rights Cell  
Fax No. 091-9210728

Encls. No. \_\_\_\_\_ /MRC

Dated Peshawar, the \_\_\_\_\_

Copy forwarded for information to:

Mst. Shahida Hassan, PET in Government Girls High School, Garhi Usman Khel, Malakanda. Mob # 0344-4746690.

/ Director,  
Human Rights Cell

put up to the court with  
relevant app.

Reader

26/3/19.



یہ ماز آؤٹ کریں۔ اور سچ لولیں۔  
جناب عالی! یہ بھی دعویٰ ہے جو میری اور معینہ صاحبہ کی تنازعہ کا سبب ہے۔

جس کی بنا پر معینہ صاحبہ نے جھوٹا بیگ لٹوائی ہے۔ جو سامنے ٹوٹا ہے اور اسے  
میں نے بھی۔ اسی طرف سے اسٹیشن سے دعویٰ ہے کہ یہ میرا حلف ہے جو کہ بیگ لٹوائی ہے۔  
بنادیا۔ اور غیر قانونی طور پر میری بیگ لٹوائی۔

(۳) یہ کہ بیگ لٹوائی دونوں کی بھی حالت تھی۔ کہ بیگ لٹوائی کے سفر آرڈر میں کہ سفر آرڈر میں اس حد  
کو وینٹ گریز جانی سٹول ڈیٹی تھی۔ اور دوسری جگہ کو وینٹ گریز جانی سٹول ڈیٹی تھی۔  
بلکہ تھی۔ اور وینٹ گریز جانی سٹول ڈیٹی تھی۔ جو اب سینئر یوسف تھی۔ یعنی سٹول ڈیٹی  
اور میں سٹول ڈیٹی تھی۔ اسی معاملہ میں میں جب جانی سٹول ڈیٹی تھی۔ اور نہ میری سے رابطہ  
ایا۔ تو اس نے جانی سٹول ڈیٹی تھی۔

(۴) جناب عالی! اسی دوران میں باقاعدگی سے سٹول جانی۔ اور خارج میں جھوٹا ہے۔ جس نے کسی دفعہ  
DEOF میں سے کو معذرت دہانہ کھانا آبیلیں گی۔ اور ساتھ میں یہ بھی تھا۔ کہ میری حلف  
معذرت دہانہ آبیلیں گی۔ اس کے نقلی مجھے دے دو۔ لیکن نہ معینہ صاحبہ کو اسے دیا۔ اور نہ میری

(۵) جناب عالی! اسی دوران میں بیگ لٹوائی تھی کہ ایسا دفعہ آبیلیں اور اسے سٹول آیا۔ مجھے اس سے  
تکلف کیا۔ کہ آبیلیں بیگ لٹوائی ہے۔ میں نے کیا۔ کہ مجھے بیگ لٹوائی ہے لیکن اسے نہیں دیا۔  
لیکن اب تو مجھے کون۔ تو معذرت دہانہ دیا۔ کہ میں اللہ کی بیٹی ہوں۔ اور یہ اللہ کی بیٹی۔  
میرے بیگ لٹوائی تھی۔ اور وہی چلی گئی۔

(۶) جناب عالی! اس سے معینہ صاحبہ کی طرف سے اب وضاحت طلبی ہوئی جس کا میں نے جواب دیا۔ جب  
میں نے DEOF کی طرف سے نا اہل ہوئی۔ تو میں نے ڈائریکٹر انچارج کو معذرت دہانہ آبیلیں گی  
جس نے میری اپیل Considered کر کے DEOF ملائی اور ساتھ میں ہی بیگ لٹوائی کے اعطاء  
جاری کیا۔ لیکن DEOF ملائی ہے اب اسے میری طرف سے معینہ صاحبہ کی

(۷) جناب عالی! یہ کہ میں نے جھوٹا بیگ لٹوائی ہے اور وہی چلی گئی۔ اور وہاں میرا بیگ لٹوائی ہے۔  
اس نے مجھے کیا کہ بی بی گلشن نے اپیل سے تین ۹۰ دن تک انتظار کریں۔  
اسی دوران میں باقاعدگی سے سٹول جانی۔ اور ابی بی بی گلشن نے نہ معینہ صاحبہ کی  
میں کوئی بات تھی۔ اور نہ DEOF ملائی ہے اسے طرف سے کوئی دفعہ ابی تھی۔  
یعنی ۹۰ دن پوری ہوئی۔ اور میں نے سہولت ہے۔

(۸) جناب عالی! اس کے بعد میں نے جب میں نے سہولت ہے DEOF اور معینہ صاحبہ کی  
اپنی نایاب ارادوں سے دوبارہ اترا لی۔ کہ میں نے سٹول سے زبردستی  
تکالیف کیا۔ اور میری حلف ہے اور اسے جمع کر کے مجھے اب شوقا زون میں

(۹) جناب عالی! اس کے بعد میں نے جب میں نے سہولت ہے DEOF اور معینہ صاحبہ کی  
اپنی نایاب ارادوں سے دوبارہ اترا لی۔ کہ میں نے سٹول سے زبردستی  
تکالیف کیا۔ اور میری حلف ہے اور اسے جمع کر کے مجھے اب شوقا زون میں

خدمت جناب چیف جسٹس عدالتی کورٹ بنا اور جسٹس لیسٹیو تھا

سائبلہ متاثرہ جسٹس فیصل انجمن ٹیچرز 15 ستمبر 1958 کو گرفت کر لی عدالتی سکول کوئی عدالتی سکول

593

درخواست پھر قانونی کارروائی کرانے غیر قانونی بندش کا معاہدہ تفریق پر جو 8/11/1958 کا تھا

جناب عالی! درخواست سائبلہ بہ عنوان بالا مسترد ہے۔

یا۔۔۔ تاکہ سائبلہ PET ستمبر 15 کی وجہ سے نا بائغ school going ہے اور اسکے

پے روزگار شروع نہیں ہوا ہے۔

یا۔۔۔ تاکہ سائبلہ گرفت کر لی عدالتی سکول کوئی عدالتی سکول میں مدرسہ کرے سکول کے بنیاد کو ہے۔

I۔۔۔ تاکہ سکول کے باہر روم بند ہے۔ پانی کی ٹینکی سرسری ہے جس کی وجہ سے

بنا دیا گیا فرق ہو سکتا ہے۔ جس سے کسی بھی وقت سکول کے ماحول کا نقصان ہو سکتا ہے

لکھنؤ کو لہرنا ہے۔ صرف سکول سے دفتر میں معینہ سرسری صابن کا استعمال ہوا ہے

کیا۔۔۔ تاکہ اس سکول کا کھانا ہے جس کے کھانے کی کوریج ہے اور اصلاح کے لئے بچوں سے صابن اور

II۔۔۔ تاکہ سپورٹس کے ناقص سامان سرسری سفر کرنے سے انکار دیا۔ اور نہ معینہ سرسری

III۔۔۔ تاکہ میں ایک PET ٹیچر ہوں۔ لیکن بی بی کی بی بی ٹیچر کے اسٹیج کے اور اسٹیج B کے ایک قاری

VI۔۔۔ تاکہ میں ایک PET ٹیچر ہوں لیکن میں نے معینہ دوسرے مضامین بھی سکول میں دیکھے ہیں۔

V۔۔۔ تاکہ سکول کے پتہ سرسری پتے کے لئے معینہ سرسری استعمال کر رہی ہے۔ جس سے سکول میں

نہیں ملتا۔ بچوں سے نا جائز مزاجہ وصول کرنا۔ اساتذہ کے DEO کے نام سے وصول کرنا ہے۔

لیکن اساتذہ کے نام سے وصول کرنا ہے۔ اساتذہ کے نام سے وصول کرنا ہے۔ اساتذہ کے نام سے وصول کرنا ہے۔

جاری کی تالیہ ٹھوٹ کا سہارا لیں مجھے غیر قانونی طور پر سفر آرڈر پر قبضہ کریں  
اور ساتھ میں جو ایئر ٹکٹ کاٹ ڈالنے کی دعوئی بھی دی۔

15) جناب عالی! سہ ماہی ڈیوٹی آف این ایئر لائن کے لیے سفر کے لیے  
گیا۔ جو اس نے سفر کی۔ لیکن پھر بھی نہ سمجھا سکا کہ اسے  
جارج ٹیورنٹ کی سی ہے۔ اور نہ میں نے جارج ٹیورنٹ سے۔

جناب عالی: میں آپ کو یہ بتا رہا ہوں۔ میں اللہ کو عاف نام  
جانتا ہوں۔ کہ میں نے جو کچھ لکھا ہے وہ سچ ہے۔ اللہ کے سوا  
میرا کوئی نہیں۔ اور اللہ نے آپ صامان کو اس لمحہ پر براجمان بنا ہے۔

اللہ آپ کے بچوں کو بھی دنیا کی آفات سے محفوظ رکھے اور عزت اللہ نے آپ  
صامان کو دی ہے۔ وہ اللہ آپ کے بچوں کو بھی دیں۔ میں نے اپنا درخواست  
آپ کے دربار میں پیش کیا۔ اگر آپ صامان نے بھی میری درخواست پر عمل دروازا نہیں کی۔  
تو پھر ان لوگوں کی مرضی ہو کر سنت میں کر لیں۔

لیفٹننٹ آپ صامان کو میری طرف سے سفر آرڈر جو غیر قانونی ہے۔ کالعدم  
قرار دی جائے۔ اور میری فامانہ تنخواہ جاری کریں۔  
میں غریب ہوں اور دعا میں یاد کرونگی۔

مجرب 20/2/2019

العاصمہ

(Signature)

شمارہ 1150 PFI گورنمنٹ گزٹنگائی سٹوڈنٹ ٹیچر شرفی عثمانی میں

جوبائل 0344-4746690

ملکنہ

2019-2024

شماره مسلسل و پنجره

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REGISTERED No. M-302  
L-7646

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PUBLISHED BY AUTHORITY

ISLAMABAD, FRIDAY, FEBRUARY 8, 2013

PART III

Other Notifications, Orders, etc.

ELECTION COMMISSION OF PAKISTAN

NOTIFICATION

Islamabad, the 8th February, 2013

No. F. S(12)/2012-Cord.—WHEREAS the Minister for Law & Justice, through his letter, dated 29-01-2013 has sought review of the Directive, dated 22-01-2013 issued by the Election Commission of Pakistan (ECP), whereby the ECP was pleased to direct as under:

- a. "That all kinds of recruitments in any ministry, division, department or institution of the Federal Government or any department or institution of any provincial and local governments is banned forthwith except recruitments by the federal or provincial public service Commission."
- b. "That diversion of funds already allocated to various development projects in the country is banned forthwith and the spending of funds so diverted shall stand frozen forthwith."

AND WHEREAS the above letter and other similar requests from various Ministries / Divisions / departments were considered by the ECP in its meeting held on 06-02-2013:

AND WHEREAS after detailed deliberations, the ECP resolved that the ban on all kinds of recruitments and diversion of funds, as reproduced above, will continue. It was further resolved that some of the requests for grant of permission to make

(441)

[143(2013)/Ex. Gaz.]

Price: Rs. 02.00

recruitments in relaxation of ban were genuine and required sympathetic consideration.

AND WHEREAS some misperceptions about the above referred Directive require clarification;

NOW THEREFORE, in exercise of its powers conferred upon it under Article 218 (3) of the Constitution and all other powers enabling it in that behalf, the Commission directs as under:

Recruitments:

- i. All vacancies which were advertised on or before 31<sup>st</sup> August, 2012 are outside the purview of the afore-referred Directive and may be filled in.
- ii. All appointments shall be made strictly in accordance with the rules applicable to such appointments and purely on merit.
- iii. The institutions established under the constitution are exempted from the ban on recruitments.
- iv. Requests from Ministries / Divisions / Departments or Institutions of the Federal Government or any department or institution of any Provincial or Local Government including Health and Education Department will be considered on case to case basis by ECP.

Diversion of funds:

- i. The development projects already in progress may continue without interruption where no diversion of funds is required.
- ii. Requests from foreign donors' to divert funds from one project to another will be considered by ECP on case to case basis.
- iii. Diversion of funds in respect of projects of strategic importance will also be considered by ECP on case to case basis.
- iv. No funds will be diverted from an ongoing project to a new or existing development project in any constituency.

By order of the Election Commission of Pakistan.

ISHTIAK AHMAD KHAN,  
*Secretary.*

Notifications (Completed by BAHARALI PET)

4th May 2011 | No.PA/ Khyber Pakhtunkhwa/Bills/2011

**THE KHYBER PAKHTUNKHWA (APPOINTMENT,  
DEPUTATION, POSTING AND TRANSFER OF TEACHERS,  
LECTURERS, INSTRUCTORS AND DOCTORS) REGULATORY  
ACT, 2011**

AN

ACT

*to regulate by law appointments, postings and transfers of teachers  
serving in primary, middle, secondary and higher secondary  
schools, lecturers in colleges and instructors in technical institutions  
and doctors in health facilities.*

**Preamble.**---WHEREAS it is expedient to regulate by law appointments, postings and transfers at local level, of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities and to ensure the availability of teachers in schools, lecturers in colleges and instructors in technical institutions and the doctors in health facilities, and to regulate deputation of doctors abroad, and to provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:

**1. Short title, application and commencement.**---(1) This Act may be called the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011.

(2) It shall apply to teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges as well as commerce colleges and instructors serving in technical institutions and doctors serving in the health facilities in the Province of the Khyber Pakhtunkhwa.

(3) It shall come into force at once.

**2. Definitions.**---(1) In this Act, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them that is to say;—

(a) “Commission” means the Khyber Pakhtunkhwa Public Service Commission;

(aa) “college” means a degree college;

(b) “doctor” means a doctor serving in the health facility;

- (c) "Government" means the Government of the Khyber Pakhtunkhwa;
- (d) "health facilities" mean all health facilities established and managed by Government to provide medical facilities to general public;
- (e) "lecturer" and "instructor" respectively means a lecturer or an instructor serving in a Technical Institution as well as in a college, as the case may be;
- (f) "prescribed" means prescribed by rules made under this Act;
- (g) "rules" mean the rules made under this Act;
- (h) "school" means school in the public sector including primary, middle, secondary school, higher secondary school or an institution of equivalent level imparting education through any system or medium of instruction in the public sector;
- (i) "teacher" means a teacher of primary, middle, secondary or higher secondary school; and
- (j) "technical institution" means and includes a Commerce College or Government College of Management Sciences or Technical Institute or Technical and Vocational Training Center or Skill Development Center in the public sector imparting technical education to students leading to the award of a degree or a diploma or a certificate.

(2) Words and phrases used in this Act, but not defined, shall have the same meanings as respectively assigned to them under the relevant federal law or provincial law or any other statutory order or rules for the time being in force.

3. Appointment, posting and transfer of primary school teachers.---(1) The vacancy of primary school teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile, on merit and if no eligible candidate in that Union Council is available where the school is situate, such appointment shall be made on merit from amongst eligible candidates belonging to the adjacent Union Councils.



Provided that on availability of a vacancy, a primary school teacher, appointed from adjacent Union Council, as referred to in this sub-section, shall be transferred against a vacant post in a school of the Union Council of his residence within a period of fifteen days.

(2) Upon marriage, the primary school teacher on request may be transferred to the school in the Union Council, where his spouse, ordinarily resides, subject to the availability of vacancy.

(3) The primary school teacher shall be transferred to other school within the Union Council on completion of tenure as may be prescribed or before completion of tenure, subject to the policy of rationalization for maintaining certain students teachers ratio, if any.

(4) Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school teachers appointed prior to coming into force of this Act, to the schools of their respective Union Councils or adjacent Union Councils, as the case may be.

4. Appointment of doctors, lecturers, instructors, subject specialists and teachers on adhoc basis.---(1) Government may, through the competent authorities make adhoc appointment on merit against the vacant posts of doctors, lecturers, instructors, subject specialists and teachers, falling within the purview of Commission, in a district concerned from the domicile holders of that district for a period of one year or till the arrival of recommendees of Commission, whichever is earlier after fulfilling the pre-requisites of giving wide publicity in the press. On assumption of charge of post by recommendee of the Commission, the services of such ad hoc appointee shall stand automatically terminated:

Provided that if no suitable and eligible candidate is available in the district concerned for appointment, then the candidates belonging to the neighbouring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section, "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or teacher who proceeds on training or long leave may be retained as ~~vacant~~ ~~post~~ for the purpose of contract or contingent appointment till the return of such employee from training or long leave and assumption of charge of the post:

Provided that the period of such training or long leave shall not be less than one year and no appointment on contract or contingent shall be made on the post which may fall vacant for a period less than one year.

5. Initial posting. --- (1) The doctors, lecturers, instructors subject specialist or teachers, upon their appointment shall be first posted in the periphery of the zone against whose quota they have been recruited, and they shall not be transferred for a period of at least three years.

(2) Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. Deputation of Doctors.---(1) Government may allow deputation abroad for all categories of doctors only once in their entire service, for a period not exceeding three years.

(2) Deputation to "Foreign Service" within Pakistan shall be permissible only in respect of medical officers for a period not exceeding three years:

Provided that no further extension, on expiry of agreed tenure shall be given to the doctors who are already on deputation abroad or within Pakistan.

7. Postgraduate Medical Education.---(1) The Health Department, on the basis of objective need assessment and analysis, shall determine the intake number of Trainee Medical Officers (TMOs) in Postgraduate Medical Institute (PGMI) and Junior Registrars in Tertiary Care Hospitals every year. This stipulated number shall not exceed in any case.

(2) Any doctor selected or permitted for postgraduate medical training shall be treated on leave without pay and may be entitled only for stipend fixed by Government from time to time for such training.

(3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribed by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of his domicile and in case of non-availability of a post in the district of domicile, he shall serve for three years in the rural area.

(4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.

(5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty; failing which the amount shall be recovered from him or from the guarantor, as the case may be.

8. Provisions relating to doctors apply to lecturers and instructors. ---The provisions relating to doctors in section 7 of this Act shall in respect of lecturers and instructors.

Act to over-ride other laws.---The provisions of this Act shall have effect notwithstanding any thing contained in any other law for the time being in force.

10. Jurisdiction barred.---Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. I of 1974), no order made or proceedings undertaken under this Act, or the rules made there under or any officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.

11. Removal of difficulties.---Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.

12. Power to make rules.---Government may make rules for carrying out the purposes of this Act.

BAHAR ALI.

PET GMS LANGOW AMAZI BUNER.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 980-81/ST

Dated: 20 / 5 / 2019

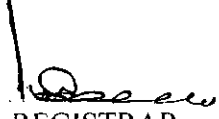
To

1. Mr. Bashir Ahmad Headmaster representative of District Education Officer Female,  
Government of Khyber Pakhtunkhwa,  
Malakand at Batkhela.
2. Mr. Toseef Ahmad Litigation Officer of Director E&SE,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

SUBJECT: - ORDER IN APPEAL NO. 196/2019, MST. SHAHIDA HASSAN.

I am directed to forward herewith a certified copy of order dated 07.05.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR,  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHA**  
**PESHAWAR**

Service Appeal No : 196/2019

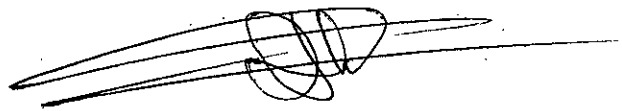
Mst: Shahida Hassan PET Govt Girls High school Gari Usmani Khail Dargai  
Tehsil Dargai ,District Malakand (Appellant)

VERSUS

**EDUCATION DEPARTMENT**

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Representative of,  
District education Officer,  
(F)Malakand at Batkhela .

①

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA  
PESHAWAR**

**Service Appeal No : 196/2019**

**Mst: Shahida Hassan PET Govt Girls High school Gari Usmani Khail Dargai  
Tehsil Dargai ,District Malakand (Appellant)**

**VERSUS**

1. Head Mistress, Govt Girls High School Gari Usmani Khel Dargai Malakand.
2. District Education Officer (Female)Malakand at Batkhela.
3. The Director of Elementary and secondary Education Khyber Pakhtoonkhwa Peshawar.
4. The Secretary Education to the government of Khyber Pakhtunkhwa Elementary&secondary Education Department.
5. Seema (NTS APPOINTEE) PET GGHSS KOT District Malakand.

**(Respondents)**

Para wise comments on behalf of respondents No 1 to 4.

Respectfully Sheweth  
Preliminary Objections.

1. That the appeal is badly barred by time and under the rules is not maintainable.
2. That the appellant has concealed material facts from the Honorable Service Tribunal.
3. That the appellant has got no cause of action to file the instant appeal.
4. That the appellant has got no locus standi to ask for claim.
5. That the appellant is estopped by his own conduct to file the present appeal.
6. That the appeal is not maintainable in its present form and is not competent.
7. That the Honorable Tribunal has got no jurisdiction to entertain the appeal.

**FACTS.**

1. Incorrect and not admitted, the appellant took charge as PET by transfer from Distt Bunir on 9.6.1999 to GGMS Gu Khel now GGHS GU Khel and remained for a period of about 20 years .During this period she created a lot issues to the school which is on the record .As related the present issue the appellant is very found of Exam duty .She performed the duty in Grade V &VIII assessment Exam 2018.Then she trying for the SSC Exam 2018 duty but respondent No.1 directed her no to do so and wait for her turn. As a result she started to create issues and refused to teach the assigned two subjects which were chosen by herself in annual teaching plan. on the report of respondent No.1 respondent No.2 conducted an inquiry through Principal GGHSS Sakhakot in the matter. She clearly reported that the mistress concerned is MA/MED and there is no reason for refusal .All her acts are against the service rules .  
**(Record of 2014 ,Expanation report and Inquiry Report are annexed as Annexure A,B&C)**

2. As related to the appellant qualification which she describes with proud but on the malafide motives, she refuses to teach the innocent kids. Moreover on seniority she will be promoted to SST on her turn and will teach all these subjects.
3. Incorrect and not admitted the appellant is a bonafied resident of village (Kharkai) which is hardly 01 Kilometer away from her new station GGHS Dargai while GGHS Gu Khel is about 06 km away. Now it is very strange that how a nearest station is not suitable for a Cardiac patient than the 06 km awayone. More over the post of PET is already filled through transfer by respondent No.4 a resident of the same village of GU khel.
4. Incorrect and not admitted, the appellant describes the irrelevant issues and trying to prove herself innocent which is 100% wrong .Her created issue has disturbed the whole situation and the young kids are suffering .Moreover, on her transfer vide order No .4955-59dated 30/10/2018 she is bound to perform her duties at GGHS Dargai under section 10 but she intentionally refused her duties and falls under misconduct. In view of this situation she is not entitled of pay as hold by the August Supreme Court of Pakistan that(No Duty, No Pay)

**(Inquiry Report of the irrelevant issues are annexed as annexure D)**

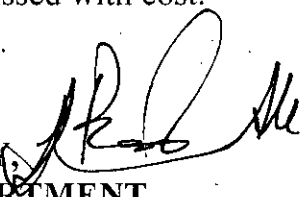
5. Incorrect and denied, only blaming someone by the appellant is not sufficient to declare herself clear. The respondent No.1 is responsible for her duty why the appellant will not be asked in this regard?
6. Incorrect and denied, The appellant has been transferred rightly on the administrative grounds and also on the recommendation on the inquiry committee .Salary is given against the duty while the appellant does not perform her duty at her station .

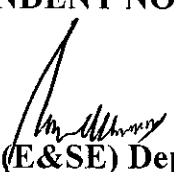
**GROUND.**

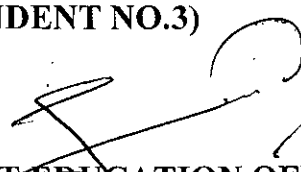
- A. Incorrect and not admitted, the appellant describes herself innocent while her conduct is not of a civil servant .She has put a blemish on the face of this graceful service . Instead of solving the issues of students and teaching , the respondents are busy to answer the baseless questions raised by the appellant.
- B. Incorrect, this is the fabricated storey by the appellant to prove herself innocent which is already replied.
- C. Incorrect, Four inquiries were conducted and she was transferred to her home station, Show cause notice was also issued. **(Inquiries Reports and Show cause are annexed E&F)**
- D. Incorrect and denied, all the process have taken place after proper procedure
- E. This para shows the contention of the appellant that how she uses the rude language.
- F. Incorrect and denied, the appellant tries herself as an obedient one, while her conduct not supports it.
- G. Incorrect and denied, the post of PET at GGHS Dargai is clearly (BPS-15) while the post at GGHS GU Khel was filled by another PET (BPS-15) transferred under the rules.**(Post clarification is attached as annexure E)**


- H. Incorrect and not admitted, the salary is given against the duty and the appellant deliberately not taken the charge at her home station. The respondent no.3 directed Mr.Muhammad Uzair Ali DEO (M)Malakand vide no 4466-72 dated 23/2/2019 to probe in to the matter and submit detail inquiry report along with clear cut recommendation to this office within 5 days positively. But the appellant did not wait for it and made an appeal against respondent no.3 which is against the rules.  
**(Inquiry Officer Appointment letter is annexed as annexure F)**
- I. The Respondents also seeks permission to raise additional grounds at the time of arguments.

It is therefore most humbly prayed that as stated with detail, the instant appeal is of no value, wastage of precious time of the respondents, misconduct by the appellant, may please be dismissed with cost.

  
SECRETARY,  
E&SE DEPARTMENT,  
GOVT.OF KHYBER PAKHTUNKHWA  
AT PESHAWAR  
(RESPONDENT NO.4)

  
Director (E&SE) Department,  
Khyber Pakhtunkhwa at Peshawar.  
(RESPONDENT NO.3)

  
DISTRICT EDUCATION OFFICER  
(F) MALAKAND AT BATKHELA.  
(RESPONDENT NO.2)

  
Head Mistress,  
Govt Girls High  
School GU Khel Dargai Malakand.  
(RESPONDENT NO.1)



4

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA  
PESHAWAR**

**Service Appeal No : 196/2019**

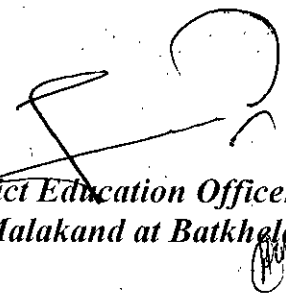
**Mst: Shahida Hassan PET Govt Girls High school Gari Usmani Khail Dargai  
Tehsil Dargai ,District Malakand (Appellant)**

**VERSUS**

**EDUCATION DEPARTMENT AND OTHERS.**

**AFFIDAVIT**

I , do hereby solemnly affirm and declare on oath that all the contents of the accompanying parawise comments are true and correct to the best of my knowledge and belief and all the coddle formalities were fulfilled.

  
**District Education Officer  
(F) Malakand at Batkhela.**

5

(Annexure A)

13

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(FEMALE) MALAKAND AT BARKHELA,

No. 497 dated 24/3/2014

To:

Mr. Rahmanullah,  
P.S. to Chief Minister Complaint Cell,  
Peshawar.

Subject: NUMEROUS PUBLIC COMPLAINT RECEIVING GGHS G.U.KHEL,  
REFERENCE TELEPHONIC DIRECTION DATED 14-03-2014

Memo:

It is stated for your kind perusal the undersigned visited GGHS G.U.Khel do dip out the facts. When I reached the gate of the school a large No. of elders and elites of the locality requested me to hear them regarding the school alarming situation. They were in found in aggressive mood and were pressing hard if the situation is not controlled in the coming few days they will lock the school.

It is worth mentioning that the two teachers named Miss. Nagina SST and Miss. Shahida PET has been quarrelling with each other for the last two years in the school which badly affected the peaceful atmosphere of the school and put the future of innocent kids in great jeopardy. A number of inquiries conducted in this regard, but unfortunately due to political pressure/interference the recommendations of the inquiry officers were not implemented which resulted in complete anarchy in the school. The annual inspection Committee in its report <sup>indicated</sup> included the misdoings of both the teachers. They not only covered the courses, but ruined moral development of the students. Both the said teachers are equally responsible to play with the future of the students. Recently the Head Mistress reported the SST teacher on whom an inquiry was conducted by SDEO(I) Sama Ranizai on her recommendation Miss. Nagina SST was transferred on administrative ground to GGCM5 Kot vide this office No.373-78 dated 02/03/2014. The transfer of Miss. Shahida PET will be made shortly on administrative ground.

Due to loose administration and criminal negligence of the Head Mistress Miss. Mubraz the situation gone from bad to worst.

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*A*  
Principal  
G.C.H.S.S Sadiyakot  
Malakand

Page No: 2

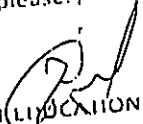
Keeping in view the above facts and evidence on the record, disciplinary action under (E&D) Rules 2011 is inevitable against both the teachers and Head Mistress in the public interest to save the institution from complete disarray. Please find the inquiry report and other relevant documents enclosed.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MALAKAND AT BATAKILLA

Endst: No. 493 dated 24/3 /2014.

Copy of the above is forwarded to the

The Director of (E&SE) Khyber Pakhtun Khwa Peshawar for information please.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MALAKAND AT BATAKHELA

Handwritten notes in Urdu script, including the name 'میرزا محمد اسحاق' and other illegible text.

6

BETTER COPY

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(FEMALE)MALAKAND AT BATKHELA.  
No. 492 dated 24/03/2014

To

Mr. Rahmanullah,  
PS to Chief Minister Complaint Cell  
Peshawar.

Subject: **NUMERIOUS PUBLIC COMPLAINT REGARDING GGHS GU KHEL.**  
**REFERENCE TELEPHONIC DIRECTION DATED 14.03.2014.**

Memo:

It is stated for your kind perusal the undersigned visited GGHS GU Khel do dig out the facts: when I reached the gate of the school a large no of elders and elites of the locality requested me to hear them regarding the school alarming situation they were found in aggressive mood and were pressing hard if the situation is not controlled in the coming few days they will lock the school.

It is worth mentioning that the two teachers named **Mst:Nagina SST and Mst:Shahida PET** has been quarreling with each other for the last two years in the school which is badly affected the peaceful atmosphere of the school and put the future of innocent kids in great jeopardy. A numbers of inquiries conducted in this regard but unfortunately due to political pressure/interference the recommendation of the inquiry officers were not implemented. which is resulted in complete anarchy in the school .The annual inspection committee in its report indicated the misdoings of both the teacher. They not only covered the courses but ruined moral development of the students .Both the said teacher are equally responsible to play with the future of the students .Recently the Head Mistress reported the SST teacher which an inquiry was conducted by SDEO(F)Sama Ranizai on her recommendation Mst Nagina SST was transferred on administrative ground to GGCMS Kot vide this office No 373.78 dated 02/04/2014 .The transfer of **Mst:Shahida PET will be made shortly on administrative grounds.**

Due to loose administration and criminal negligence of the Head Mistress Miss Mehnaz the situation gone bad to worse.

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Page No :2

Keeping in view the above facts and evidence on the record ,disciplinary action under(E&D) Rules 2011 is inevitable against both the teacher and Head Mistress in the public interest to save the institution from complete disarray please find the inquiry report and other relevant documents enclosed.

DISTRICT EDUCATION OFFICER  
(FEMALE) MALAKAND AT BATKHELA.

Endst No: 493 Dated 24/03/2014.

Copy of the above is forwarded to the  
The Director of (E&SE)Khyber Pakhtunkhwa Peshawar for information please.

DISTRICT EDUCATION OFFICER  
(FEMALE) MALAKAND AT BATKHELA.

8  
Annexure B

FROM THE OFFICE OF HEAD MISTRESS GGHS GU KHIEL  
DARGAI MALAKAND.

Endst No: 237

Dated: 13/04/2018

To

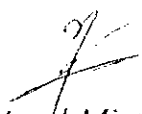
Mst. Shahida Hussan PET  
GGHS GU Khel Malakand.

Subject: EXPLANATION.

memo:

As you know new session has been started from 9/4/2018 and April to Ramadan it's a golden period for teaching. all of our school's teachers are teaching on war basis but astonishingly you have refused to teach those subjects which you have chosen herself in the Annual teaching plan except PT& HPE of class 9<sup>th</sup> while you are not a subject specialist but a PET teacher.

In this regard explain your position within three days otherwise disciplinary action will be taken against you as the govt rules that why you are not taking other classes except PT& HPE of class 9<sup>th</sup>.

  
Head Mistress  
Govt Girls High School  
GU-Khel Dargai Malakand.

Copy for information to :-

1. District Education officer (Female) Malakand at Batkhela.
2. Director (E&SED) Khyber Pakhtunkhwa at Peshawar.

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OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(F) MALAKAND AT BATKHELA.

Telephone No. 0932-410283  
E-mail: emismalakand@yahoo.com

APPOINTMENT AS  
INQUIRY OFFICER/

The Undersigned is pleased to Appoint Mst.Safia Begum Principal Govt.Girls Higher Secondary School Sakhakot as Inquiry Officer to conduct Inquiry against Mst.Shahida Hassan PET Govt: Girls High School Ghari Usmani Khel of her misbahavour with Head Mistress and Staff of the School, and submit Report with documentary proofs within 7 day positively.

(MST:SADIA ILYAS)  
DISTRICT EDUCATION OFFICER  
(FEMALE)MALAKAND AT BATKHELA.

Endst:NO.NO. 1558-54 /F.No.1/Establishment (Branch)Dated Batkhela the 21/04 /2018.

- Copy of the is Forwarded to
- 1.. Mst:Safia Begum Principal GGHS Sakhakot (along with Complete Case) with the remarks to inform the Head Mistresses concerned.
  2. Head Mistress GGHS GU Khelto make full cooperation with the inquiry officer.

DISTRICT EDUCATION OFFICER  
(FEMALE)MALAKAND AT BATKHELA

Faridoon/Tran:/doct:

MALAKAND

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## INQUIRY REPORT

Reference letter No 1558-59 dated 21/04/2018 by the DEO (F) Malakand, Batkhela undersigned being inquiry officer along with MS Yasmeen SST (G) visited GGHSS Garhi Usmani Khel on 02/05/2018 to conduct the inquiry against MST Shahida Hassan PET GGHSS Garhi Usmani Khel.

The inquiry report consist of the following steps:

### Findings / Summary:

The qualification of accused PET Shahida Hassan D/o Hassan Gul Is M.A Pashto, MED and JDPE. Her date of taking over charge in the present school is 09/06/1999. Head Mistress Yasmin Begum D/o Shahzaram Khan M.A (ISL), BED and date of taking over charge on the present post is 18/-03/2016.

The H/M of GGHSS G.U hel complained through letter No. Nil Dated Nil to the DEO (F) Malakand office about the persistent Miss behaviour of the PET Shahida Hassan. The H/M stated that the accused PET has refused to take the period assigned to her in the time table 2018-19. she has been assigned class 10<sup>th</sup> Pashto 9<sup>th</sup> Is (E), 9th HPE and P.T from 6<sup>th</sup> to 10<sup>th</sup> one period of each class in a week. She has total 20 period in a week. (Copy enclosed) while other teacher have also assigned 21-23 Period.

Total enrolment of the school is 454, while teaching staffs 19.

According to the statement of h/m and PET, the PET has duties regarding discipline and conduction of morning assembly. The H.M added that she and other teachers also help the PET in maintaining discipline.

The H/m admitted that she did not call PTC meeting regarding the conflict, facing the school for more than three weeks.

She called the explanation from the PET regarding her stubborn attitude. The H/M stated that for the last two years the school participated in Dist. level games only in volley ball and got no position. While in athletics 1st position in jump and third in Javelin.

Majority of teachers are M.A B.ED, M.ED (staff statement enclosed)

### STATEMENT OF ACCUSED PET MS SHAHIDA HASSAN

The accused PET Ms Shahida Hassan stated that she is only a physical education teacher. She has got training in physical education and she is bound to teach only physical education and P.T classes. The accused PET stated that the H/M has discriminative attitude with me as she did not allow her for trainings held in GGHSS Ghari Usmani Khel. In the reply of explanation called by the H/M she also refused to take period other than PT. (copy enclosed) the H/M in her letter No Nil Dated Nil has stated that the accused teacher is very problematic and creates problem for the school administration. The HM produced a letter from DEO (F) Malakand having subject "numerous public complaint regarding GGHSS S.U.Khel reference telephone Direction Dated 14/03/2014"

Endst. No 493 Dated 24/03/2014, addressed to the Mr Rahmanullah P.S to chief minister complaint cell, Peshawar. In the same letter it is stated that the PET Shahida Hassan has some tussles with another SST also and responsible to damage the conducive environment of the school and ruined the future of the school students by not taking classes. The H/M issued not a single order, duties circular to the accused PET in this regard on order book.

Principal  
GGHSS Saktokot  
Malakand



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answered the question, the PET said that she taught Pashto, pak studies, English, Islamiyat etc. from 6th to 10<sup>th</sup> has got 69% to 100% result (copy enclosed).

**STATEMENT OF THE STAFF MEMBERS.**

The staff members also stated that the stressful situation is continued between the H/M and PET regarding time-table for the last one month. (Copy enclosed). They added that the PET is refusing persistently to take other subject and even vacant period of the teacher, on leave.

**CONCLUSIONS:-**


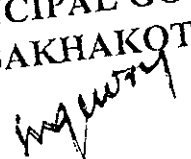
- From the above findings the following conclusion have been drawn.
1. There are eight period of PT in a week. The accused teacher is M.A (Pashto) MED. As additional qualification. She can teach any subject as M.ED is the highest Professional degree.
  2. In the past she has been taught English Pak -studies to 6<sup>th</sup> 10<sup>th</sup> etc. While the result is up to 100%.
  3. The PET has not any heavy co -duty. The discipline is automatically maintained if the teacher is present in her class.
  4. The PET is not taking the other assigned period/subject deliberately/wilfully.
  5. The school has low enrolment having 19 teaching staff.
  6. The statements of the PET and H/M indicate that there is some personal grudges between them.
  7. The H/M relied only on verbal warning and did not involve the PTC in the matter.
  8. It is also concluded that the documentary proofs show the loose administration of the Head mistress.
  9. The attached letter No493 Dated 24/03/2014 also indicates that the accused PET has remained non cooperative in the past also. ( the letter may be verified )

**RECOMMENDATIONS:**

- The following recommendations are made from the above conclusions.
1. Warning may be issued to the H/M for her loose administration and may also be directed to it make cooperation with the subordinate and try to keep the atmosphere conducive and peaceful for teaching learning process.
  2. The PET may be warned to extend her cooperation with the H/M and other staff members, as by taking additional / subject as she has also highest professional qualification, on need basis and in the interest of students.

**ENCLOSURES:**

1. letter regarding inquiry
2. Staff statement
3. Time table of PET
4. Letter of H/M to DEO(F) Malakand
5. Letter No 492 dated 24/03/2014 of DEO(F) Malakand
6. Statement of PET

  
**PRINCIPAL GGHSS  
 SAKHAKOT**  


انکوائری بسلسلہ شکایات مس شاہدہ حسن پی ای ٹی گورنمنٹ گرلز ہائی سکول گڑھی عثمانی خیل

آج مورخہ 2018ء 15 مئی کو میں نے حکیم ڈی ای او صاحبہ گورنمنٹ گرلز ہائی سکول گڑھی عثمانی خیل کا دورہ کیا۔

اور مس شاہدہ حسن پی ای ٹی کی طرف سے بھیجے گئے شکایات کا جائزہ لیا۔ چونکہ اس میں پانی اور لیٹریز کی شکایات شامل تھی اسلئے ڈی ای او صاحبہ نے فوری طور پر ایکشن لیتے ہوئے مجھے اس کا جائزہ لینے کیلئے بھیج دیا۔

مس شاہدہ حسن پی ای ٹی کی شکایات میں تمام لیٹریز بند اور گندہ ہونے کی رپورٹ تھی۔ مگر میں نے تمام لیٹریز کھلے اور صاف پائے۔ اور ہیڈ ماسٹرس صاحبہ نے بتایا کہ اس کی صفائی سکول کی خالی باقاعدگی سے کرتی ہے۔ مگر جب بند ہو جاتے ہیں تو ہم اس کیلئے درگزی ہسپتال سے وکاش یا اس کا بھائی آکاش بلااتے ہیں۔ جس کا فون نمبر: 03429422745 ہے۔

دوسری شکایات ان کی یہ تھی کہ ڈائٹنک پر ڈھکن نہیں ہے اور اس میں چوہے پڑے رہتے ہیں۔ مگر میں نے جب اس کو جاننے کیا تو اس کیلئے لوہے کے ڈھکن بنائے گئے تھے اور چند دن پہلے ان کی کوریٹیشن بھی کی گئی تھی۔ اس وقت میں نے شاہدہ حسن کو بھی بلایا اور اسے بتایا کہ آپ کی شکایت غلط ہے۔ اس میں کوئی چوہہ وغیرہ نہیں ہے۔ یہ صاف اور اس پر ڈھکن رکھے گئے ہیں۔ اس کے بعد جرمانوں کے بارے میں تمام فارم ماسٹرز سے معائنہ کیا۔ تو فارم ماسٹرز نے کسی قسم کی جرمانے لینے اور اس کو ہیڈ ماسٹرس کے حوالہ کرنے کو جھوٹ قرار دیا۔ انہوں نے کہا کہ اگر ہم ڈسپلن برقرار رکھنے کیلئے کبھی جرمانہ لیتے ہیں تو اسے اپنے کلاس ہی میں چارٹس وغیرہ پر لگاتے ہیں۔ اور ہم نے آج تک ہیڈ ماسٹرس صاحبہ کو ایک پائی بھی نہیں دی ہے۔

نتیجہ و سفارشات: اسی طرح ایک ایک کر اس کی تمام شکایات کا جائزہ لیا مگر اس کے تمام شکایات غلط ثابت ہوئے۔ اور مجھے اندازہ ہوا کہ وہ محض اپنی غلطیوں کو چھپانے کیلئے سکول سٹاف اور ہیڈ ماسٹرس نام کرنے کی کوشش کر رہی ہے۔ میں نے ثبوت کے طور پر تمام چیزوں کے قصا و ریکارڈ اپنے موبائل میں محفوظ کر لئے۔ مگر مس شاہدہ حسن نے اپنی غلط شکایات کا دوبارہ کبھی ذکر نہیں کیا۔ اس سلسلے میں میری تجویز ہے کہ مس شاہدہ حسن کی اس قسم کے ناما شکایات پر سرزنش کی جائے۔ تاکہ وہ اپنے سکول اور سٹاف کو بدنام کرنے سے باز آجائے۔ کیونکہ اس قسم کی غلط شکایات سے سٹاف میں مایوسی بڑھتی ہے اور ان کی کارکردگی پر منفی اثرات پڑھ سکتے ہیں۔

مس شاہدہ حسن  
District Officer (for  
S&L) Malakand at Bakhara  
ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) ضلع ملاکنڈ

ENQUIRY REPORT AGAINST MST. SHAHIDA HASSAN PET GOVT. GIRLS HIGH SCHOOL GHARI USMANI KHEL, DISTRICT MALAKAND REGARDING MISBEHAVIOUR AND REFUSAL FROM VACANT PERIODS OF ON CASUAL LEAVE TEACHERS.

*Farmanullah*  
*Dist. up*  
*25/8*

Name of enquiry officer.  
Date of enquiry.  
Place of enquiry.

Mst. Shaheen Begum SDEO (F) Bakhela.  
27-08-2018  
G.G.H.S. Ghari Usmani khel, District Malakand.

**D.E.O (F) Mkd**  
Diary.....1482.....  
Date: 25-09-2018.....  
At Bakhela

In compliance with the orders of the worthy District Education officer (Female) Malakand at Batkhela vide her office memo No. \_\_\_\_\_ dated \_\_\_\_\_ 2018, I the undersigned accompanied Mr. Farmanullah Superintendent of my office visited Government Girls High school Ghari Usmani Khel, District Malakand on 27-08-2018 to conduct enquiry against Mst. Shahida Hassan PET GGHS, Ghari Usmani Khel.

FINDINGS.

STATEMENT OF SST AND SENIOR C.T. OF GGHS, GHARI USMANI KHEL.

A Written statement duly signed by them was given by Mst. Fatma Naz SST and Nelofar Senior C.T. of the school. In which they stated that some tussles has been started for about two years by the persistent mis- behavior of Mst. Shahida Hassan PET with her immediate boss /Head Mistress GGHS, Ghari Usmani Khel with the plea that Mst. Shahida Hassan PET did not take the period assigned to her in the time table 2018-19. Mst. Sadia Ilyas the worthy District Education officer (Female) Malakand at Batkhela visited the school and solve the problem. After the decision of the worthy D.E.O. (Female) Malakand at Batkhela, Mst. Shahida Hassan PET then refused on dated 25-08-2018 to take vacant period of on leave teachers. Then the other teachers of the school were refused to take vacant periods of Mst. Shahida Hassan PET, as and when she on C/ leave and the peaceful environment of the school was then damaged. The Headmistress of the school did not take any work of herself on the teachers. They stated that the periods of all the teachers are equal, as 21, 22, and 23 per week. They further stated that Mst. Shahida Hassan PET changed her verbal statement each and every day and giving habitually false/wrong statement to each and every enquiry officer. (Copy of written statement is enclosed as Annexure "A" )

STATEMENT OF MST. HAMIA SST GGHS, GHARI USMANI KHEL.

A Written statement duly signed by her was given by Mst. Hamia SST. She stated in her statement that tussles were started between the Headmistress and Mst. Shahida Hassan PET due to refusal from taking subject periods and vacant periods. Mst. Saadia Ilyas DEO (Female) Malakand visited the school and solved the issue. After the decision of the worthy DEO (F) Malakand at Batkhela, Mst. Shahida Hassan PET then refused on dated 25-08-2018 to take vacant period of on leave teachers. The environment of the school then damaged. She stated that the behavior of Mst. Shahida Hassan PET is

*Signed*  
*Post up on file*  
*[Signature]*

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good with other staff. She further stated that the periods of all the teachers are equal, as 21, 22, and 23 per week. (Copy of written statement is enclosed herewith as Annexure "B").

STATEMENT OF HEAD MISTRESS GGHS, GHARI USMANI KHEL.

A written questionnaire was handed over to the Headmistress GGHS, Ghari Usmani Khel namely Yasmeen Begum. She recorded her remarks in reply that She took over charge as Headmistress at the present school on 18-03-2016, While Mst. Shahida Hassan PET took over charge as PET at this school on 31-05-1999. She stated that shahida Hassan PET was taken twenty (20) periods, but the D.E.O.(F)Malakand reduced her periods to sixteen (16). Mst. Shahida Hassan PET also teaches Physical Education to 9<sup>th</sup> and Pashto to class 10<sup>th</sup>. The Headmistress clearly recorded her remarks in question No.08 that Mst. Shahida Hassan PET did not obey her order, as and when directed to take subject period or vacant period. The teacher also refused that she is not bound to take any vacant period of other on leave teachers being PET. The last year result of the teacher as jewelring was 3<sup>rd</sup> and race was first. The under enquiry teacher is misbehavior with the immediate boos/ Headmistress. The Headmistress replied in her reply No.12 that the teacher concerned did not take any period accept Physical and PT, such like S.S. Before this enquiry Mst. Safia Principal GGHS, Sakhakot also conducted an enquiry on 02-05-2018 in this regard, but no result. The worthy DEO (F) Malakand was solved the issue during her visit on 02-08-2018 to this school, but Mst. Shahida Hassan PET then refused to take any vacant period of the teachers on leave. The Headmistress stated that Mst. Shahida Hassan PET then refused to take vacant period of other teachers after compromise of the DEO (F)Malakand on 02-08-2018 amongst them, while the DEO (F) Malakand was reduced her periods from twenty to sixteen. The Headmistress stated that she teaches Islamiyat Elective to class 9<sup>th</sup> on the verbal order of the worthy D.E.O. (F) Malakand till now, but she refused. (Copy of written statement is enclosed as annexure "D").

STATEMENT OF ACCUSED MST. SHAHIDA HASSAN PET GGHS, GHARI USMANI KHEL.

A Written questionnaire was handed over to Mst. Shahida Hassan PET GGHS, Ghari Usmani Khel.. She verbally stated that she tired from enquiries conducted in each and every month. Then she replied the questions. She stated that she teaches Pashto to 10<sup>th</sup> Class and PT to 6<sup>th</sup> A, B, 7<sup>th</sup> A,B, 8<sup>th</sup> A,B; 9<sup>th</sup> and 10<sup>th</sup> and Physical Education to 9<sup>th</sup> class. Before this she taught Urdu, Pashto, Islamiyat, English, Pak study, Geography, and Home work. She teaches sixteen periods per week. The mistress concerned is M.A. B.Ed, Med, and DPED. She replied in question No.07 that she is Physical teacher and she has teaching discipline. Mst. Safia Principal GGHS, Sakhakot has been conducted enquiry in this regard. She stated that she obeys order of the Headmistress, but she is Physical teacher and she has The DEO (F) Malakand has visited the school before this enquiry and worked under the rules. replies in question No.12 that the statement of the Headmistress is baseless. (Copy of written statement is enclosed as annexure "E").

CONCLUSION.


1. There are 19 teachers in the school in different cadres.
2. Mst. Shahida Hassan PET is not taking the other duty, period and subject assigned to her by her immediate boss intentionally, so the situation of the school is damaged day by day and the precious time of the students is wasting.
3. The other mistresses of the school i.e. DM, AT, TT, Qaria etc. refused to take vacant period/subject period .
4. on the refusal of the mistress concerned.
5. The statement of PET and Headmistress shows that the tussles between them were started on SSC duty. The Headmistress directed all the teachers to perform examination duty turn by turn, but she refused.
6. The PET has not any heavy co-duty. The discipline is automatically maintained, when the teacher is present in class room.
7. In the past she taught English, Pak study to 6<sup>th</sup> 10<sup>th</sup> classes, while her result was up to 100%.why she refused to teach other subject now.
8. Total enrolment of students in the school is 432.
9. The accused teacher is MA and MED and she can easily teach any subject.
10. The Headmistress concerned has not involved PTC committee in this regard.
11. The accused teacher was also remained non co-operative with the Ex- Headmistress of this school.
12. During the process of enquiry the teacher concerned speaks with the enquiry officer on high sound. She was directed again and again to avoid such irregular language, but she refused.
13. If the accused mistress should be transferred to other school. The issue will be solved once for all, as she did not obey the orders of her immediate boss.

RECOMMENDATIONS.

1. The accused mistress namely Mst. Shahida Hassan PET may be transferred to other school in the interest of students, so that the issue should be settled once for all.
2. The mistress concerned is non-co-operative.
3. She have nineteen years longest tenure at the present school GGHS, G.U. Khel. She has completed her normal tenure at the present school.

Encl: As above.

No. 553 Dated 25-9-2018

  
SHAHEEN BEGUM  
ENQUIRY OFFICER  
SUB DIVISIONAL EDU.OFFICER (F)  
SWAT RANIZAI AT BATHELA.  
S.D.E.O. (Female)  
Batkhela

والذمہ برائے ڈیوٹی کے لئے 330 ایچ ایچ او کے لئے



(1) ایک نیا کالج کراچی میں  
لاہور میں بھی - پبلک سروس

(2) ایک کالج کراچی میں

M.A-B-Ed

(3) آر ایس ایف میں کب سے اس کے لئے کھلی جگہ ہے؟  
18/03/2016 سے

(4) آر ایس ایف میں کون کون سے شرف کے لئے کھلی جگہ ہے؟  
19

(5) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
31/05/1999 سے

(6) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
12/2018 سے

(7) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
16 دسمبر 2018 سے

(8) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
10th کلاس سے

(9) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
10th کلاس سے

(10) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
10th کلاس سے

(11) مسز شاہدہ حسن <sup>PET</sup> سکول میں کب سے کھلی جگہ ہے؟  
10th کلاس سے

منبع اطلاعات  
P

(11) سرگزارا کا آفس کے افسر کو کیا ہے ؟  
ناقص است ہے۔

(12) اگر افسر کے ذرا لکھی رہی ہے کیا ہے ؟

(13) فزیکل اور تھری کے علاوہ اور پیریڈ میں کتنی (SS) کی طرح  
اور ڈیوٹی پیریڈ میں کتنی اور ڈیوٹی پیریڈ میں کتنی

(14) یہاں - اس بات میں عینہ فقیر پرنسپل میں آگوسٹ میں انٹرو انٹری کی  
DEO (F) ملازمہ نے اس دوران سکول کا دورہ کیا ہے کہ

(15) 2 اگست کو DEO (F) نے (انٹری) کے دوران سکول کا دورہ کیا ہے کہ  
PEA نے اس کے ساتھ ساتھ (انٹری) کے دوران سکول کا دورہ کیا ہے کہ  
14 اگست کو اس کے ساتھ ساتھ (انٹری) کے دوران سکول کا دورہ کیا ہے کہ

(16) DEO (F) ملازمہ کے چھٹے کے بعد آ - دوران میں  
سپرٹیز نرنگ کلاس میں تھی ؟

(17) 2 اگست کو ملازمہ کے بعد چھٹے اور (DEO) کے صلح کروانے کے باوجود  
PEA نے خالی پیریڈ میں انٹار کیا -  
تخلی کلاس میں یہاں ( )

(DEO) کے صلح کروانے کے باوجود خالی پیریڈ میں سے انٹار  
کیا - ملازمہ DEO (F) نے اس کے پیریڈ میں کمرے  
90 سے 16 کے - اور ایک Subject  
پڑھانے کو کہا - جو اب سے پڑھائی ہوں -  
کلاس 9th کو - اسلحا بات اخباری

HEAD MISTRESS  
G.H.S. Garmi Usmani Kheil  
MKD Agency

S.D.E.O. (Female)  
Batkheila

معمولاً نامہ ہمارے میں شہادۃت حسین پناہی کی  
گورنمنٹ ٹیچرنگ کالج سکول گڑھی عثمانی چنل ملانہ

سوال نمبر 2 آپ کا نام اور عہدہ لکھیے۔  
سوال نمبر 3 آپ سکول پڑھیں کب سے ہے؟  
سوال نمبر 4 اس سے پہلے آپ کون کون سے شعبوں میں پڑھا ہے؟

سوال نمبر 5 آپ کے ہفتے میں کل کتنے پیر ہوتے ہیں۔  
سوال نمبر 6 آپ اپنی تعلیم اور پروفیشنل قابلیت کتنی ہے۔

سوال نمبر 7 بقول پیدائش سے پہلے جن چیزوں پر توجہ دینی چاہیے۔  
سوال نمبر 8 اس سے پہلے آپ کے خلاف کوئی انڈوسٹری ہو چکی ہے۔  
سوال نمبر 9 آپ اپنے سکول کے پیر میں سے کون سے کام مانتے ہیں۔

سوال نمبر 10 اس سے پہلے آپ نے کون سے کام کیے ہیں۔

سوال نمبر 11 اس سے پہلے آپ نے کون سے کام کیے ہیں۔

سوال نمبر 12 اس سے پہلے آپ نے کون سے کام کیے ہیں۔

سوال نمبر 13 اس سے پہلے آپ نے کون سے کام کیے ہیں۔

سوال نمبر 14 اس سے پہلے آپ نے کون سے کام کیے ہیں۔

سوال نمبر 15 اس سے پہلے آپ نے کون سے کام کیے ہیں۔



سوال 10 کیا R.E.O.F. بالائے ذکر سکول میں کامیاب ہے کیا ہے؟  
ہاں ہے کیا ہے۔

سوال 11 ڈی ای او میں کیا اقدام لیا۔

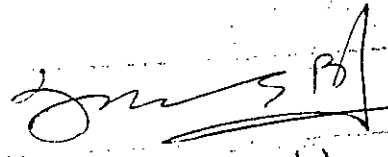
سوال 12 جن 1000 سے زیادہ اسکولوں میں 10th کی پختہ کلاس دے دی۔  
کیا اسکول کے دونوں میں کوئی تعلق رکھتا ہے یا نہیں؟

سوال 13 جس میں پڑھنے والوں کے بیان میں جو کچھ بیان ہے  
وہ ایماندارانہ ہے اس کی کوئی کاپی بھی نہیں لکھی گئی۔  
تعلق کلاسیکی علم بیان کریں۔

مجھے خود کچھ معلوم نہیں ہے کیا یہ پتہ بتا سکتے ہیں؟

شمارہ 100  
P.E.T. سن 2018  
G. G. H. G. Khel.

Date 27-8-2018



S.S.F.O. (Female)  
Bakheela

## علیحدہ بیان

میں ناظم تار (SST) سٹیوٹر SCT  
 اللہ کو حاضر و ناظر جان کر یہ کہتی ہوں  
 کہ میرے سکول کی صدر مسٹر کپور اور PET  
 کے درمیان کچھ عرصے سے اختلافات شروع  
 ہیں جس کی وجہ سے PET کا Subject  
 period لینے سے انکار کرنا تھا۔ پھر  
 DEO میں شکایت نے آکر وہ مسئلہ حل  
 کرایا۔ اس کے بعد مورخہ 25-08-2018 کو  
 ہفتہ میں شاہدہ حسین نے Vacant period  
 لینے سے انکار کر دیا۔ اور باقی اساتذہ  
 نے اسے شاہدہ کے متاثر کرنے کی صورت میں  
 اس کے پیورٹ لینے سے انکار کر دیا۔  
 اس کے بعد سکول کا ماحول پھر سے کشیدہ  
 ہو گیا۔ دونوں کا رویہ ایک دوسرے کے نسبتاً  
 مناسب ہے۔ H/M نے بھی ہم سے کوئی  
 ذاتی کام نہیں کرایا۔ تمام اساتذہ کے  
 پیورٹ تقریباً یکساں ہیں۔ (21، 22 اور  
 23 کی ہفتے)۔ میں شاہدہ پاٹوں کو  
 توجہ سردار کرپیشن کرتی ہے اور غلط  
 بیانی سے کام لیتی ہیں۔ یہ گھرائی ان  
 میں از حد مہم ہے۔

SCT میں سٹیوٹر

میں ناظم تار SST

S.D.E.O. (Female)  
 Bathkela



میں میں علیہ (SST)

اللہ کو حاضر و ناہم جان کر یہ ملتی ہوں۔  
کہ ہمارے سکول کی پیدائش میں اور P.E.T

کے درمیان کچھ عرصے سے اختلافات شروع ہوئے  
تھے۔ وہ تھے (P.E.T) کا (Subject Period)

لیے سے انکار۔ ان اختلافات کو دور کرنے کے  
لیے (D.E.O) میں سجدہ نے بیان کر مسئلہ حل

کرایا۔ اس کے بعد مورخہ (05.08.13) کو میں شاید  
صاف vacant پوزیشن کے لیے سے انکار کیا، تو H/M

اور P.E.T کے درمیان کچھ سے کشیدگی پیدا ہوئی۔  
میں شاید مناسب کے ساتھ وہ یہ اچھا ہے

تمام اساتذہ کے پوزیشن تقریباً بلیا ہیں۔  
(21, 22, 23)

میں میں SST کو رٹ کر لڑھائی سکول  
میں میں عثمان جیل

*S. D. E. O.*  
S.D.E.O. (Female)  
Batkheia

(22)

(Annexure F)

SHOW CAUSE NOTICE

I, Fahmida Begum District Education officer (Female) Malakand as a competent authority under the Khyber Pakhtunkhwa Government servants (E&D) Rules 2011 do hereby serve you Mst. Shahida Hassan PET Government Girls High school Ghari Usmani Khel, District Malakand.

As reported by the Principal G.G.H.S. Ghari Usmani Khel regarding her misbehavior, refusal from teaching of subjects other than PET activities to students, not taken over charge at new place of posting inspite issuing of reminders.

An enquiry was conducted against you by the SDEO (Female) Batkhela in connection with misbehavior, refusal from teaching of subjects other than PET activities to students and a detailed enquiry report was submitted vide her office memo No. 563 dated 25-09-2018.

In light of enquiry report dated 25-09-2018 you have been transferred to GGHSS, Dargai vide office order endst. No. 4955- 59 dated 30-10- 2018, but you did not take over charge against PET post at GGHSS, Dargai till now.

A relieving certificate issued by the Head Mistress GGHS, Ghari Usmani Khel, but you refused to receive relieving certificate from your immediate boss.

Non compliance report against you received from the Head Mistress GGHS, Ghari Usmani Khel vide her letter No.256 dated 13-11-2018.

Meanwhile, Reminder for non-compliance of transfer order issued vide this office reminder No.5496 dated 22-11-2018, No.5810 dated 07-11-2018, No. 26 dated 02-01-2019.

Ongoing through the materials on record and other connected papers, I am satisfied that you have committed the following acts/omissions specified in Rule-3 of Khyber Pakhtunkhwa Civil Servants (E&D) Rules 2011.

(a) Misconduct.

(b) Guilty of misconduct and refusal from teaching of subjects other than PET activities to students, not take over charge against PET post at new station, where you have been transferred i.e. GGHSS, Dargai.

2. (i) On the basis of the afore mentioned valid grounds and facts, the undersigned being competent authority in exercise of the power conferred under Rules-5 (1) (a) of the Khyber Pakhtunkhwa (E&D) Rules, 2011, deem it necessary to impose upon you the minor penalty of stoppage of two annual increments for two years under rules 4(b) (iii) of the Khyber Pakhtunkhwa Civil Servants (E&D) Rules, 2011.

P.T.O

(Annexure G)

(P.24-6)

*[Handwritten Signature]*

Principal  
GGHS Dargai Mkd:

No 620 Dated 3/4/2019

To,

The D.E.O (F)  
Malakand

Subject; DETAILS OF PET POST OF GGHS DARGAI.

D.E.O (F) Mkd  
Diary.....76.....  
Date: 10-04-2019.....  
At Bathhela

Reference to your message on Telephonically dated 03.04.2019, on the subject cited above, It is stated One Mrs Shaista SPET of this school was promoted to the post DPE, while Mrs Perveen Begum PET of this school was promoted to the Post of SPET BPS No 16.

Now it is certified that one post of PET BPS No 15 is laying vacant of this school

*[Handwritten Signature]*

PRINCIPAL  
GOVT GIRLS HIGH  
SCHOOL DARGAI

(25) (Annexure G-1)

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) MALAKAND AT BATKHELA.

**OFFICE ORDER:-**

In pursuance of the Notification issued by the Director, (E&SE) Khyber Pakhtun Khwa Peshawar under his office endst:No.5807-10/F.No.1/Promotion Senior PET B-16 Malakand dated Peshawar the, 22-12-2017, the following PETs BPS-15 promoted to the post of Female Senior PETs BPS- No:16 is hereby further adjusted against the PET posts, up-graded to BPS-No:16 and re-designated as Senior PETs of the Govt:of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No.SO(B&A)/1-18/E&SE/2012 dated 11-07-2012 bearing Finance Department Endt:No.SO(F)/FD/10-22(F)2010 dated 16-07-2012.

S.No	Seniority No.	Name	Father's Name	Name of Present School	School where posted as Senior PET BPS-16	Remarks.
1	08	Mumlikat Begum	Mushfiq Ali	GGMS Nal	GGHSS Palai	Against v.post of SPET B-16
2	23	Parveen Begum	Mian Sanobar	GGHS Dargai	GGHS Dargai	Against v.post of SPET B-16
3	25	Farzana Gul	Taza Gul	GGMS Bagh Din Kalli	GGHSS Koper	Against v.post of SPET B-16
4	26	Haleema Nawab	Nawab Khan	GGMS Gul Zada Kalli	GGHSS Haryan Kot	Against v.post of SPET B-16

**Note:**


1. Charge reports should be submitted to all concerned.
2. Other terms and conditions as laid down in the Notification of 22-12-2017 shall remain intact.

(DILSHAD BEGUM)  
DISTRICT EDUCATION OFFICER,  
(F)MALAKAND AT BATKHELA

Endst: No. 159-66 /Promotion (F) Senior PET, B-16, dated 05/01/2018.

**Copy forwarded to the:-**

- 1 Director (E&SE) Department Khyber Pakhtunkhwa, Peshawar vide his office Notification endst: No.5807-10/file No.1/Promotion Senior PET B-16 dated 22-12-2017, for information please.
2. District Accounts Officer Malakand.
3. B&AO local Office for necessary action.
4. Principal/Head Mistresses of the concerned schools.
- 5-8 Teachers concerned.

  
DISTRICT EDUCATION OFFICER,  
(F)MALAKAND AT BATKHELA



26 (Annexure H)

**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA,  
PESHAWAR**

**NOTIFICATION**

Muhammad Uzair Ali, District Education Officer (Male) Malakand, is hereby appointed as Inquiry Officer to conduct enquiry regarding the appeal/complaint lodged by Mst. Shahida Hassan PET GGHS Garhi Usman Khel District Malakand (copy attached).

The Inquiry Officer is requested to probe in to the matter and submit detail inquiry report alongwith clear cut recommendation to this Directorate within 5 days positively please.

**DIRECTOR**

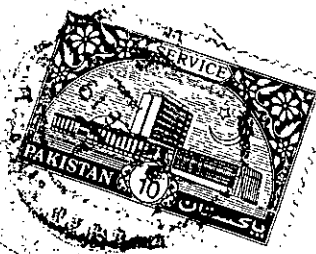
h h b o - 72  
Endst: No. \_\_\_\_\_/A-25/Vol-IV/Complaint of PETs/DPEs Dated Peshawar the: - 29/2/2019.

Copy of the above is forwarded to the: -

1. Muhammad Uzair Ali, District Education Officer (Male) Malakand.
2. District Education Officer (Female) Malakand.
3. Principal, GGHS Garhi Usman Khel District Malakand.
4. Mst. Shahida Hassan PET GGHS Garhi Usman Khel District Malakand.
5. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.

*[Signature]*  
ASSISTANT DIRECTOR

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.



**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA PESHAWAR.**

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

In Service Appeal No. 196/ of2019.

Mst, Shahida Hussan VS Headmistress and others.

**Application for fixation of the above mentioned appeal to be heard in Peshawar Bench.**

**Respectfully Sheweth as under:-**

1. That the above mentioned service Appeal is pending before adjudication in this Honourable Tribunal and next date of hearing is fixe as \_\_\_\_\_ before the Houourable Bench camp court Swat.
2. That due to some alarming threat the petitioner/Appellant is unable to pursue and attend the proceeding in this honourable bench camp court Swat, Mingora.
3. That preferably the location of Peshawar is felt safe and the Appellant will and can attend the proceeding in the above mentioned appeal in the circumstances there.
4. That the above mentioned appeal is unavoidably needs and necessary to be transferred to Peshawar for further hearing before the Honourable Bench of Peshawar Head quarter.

Therefore it is humbly prayed that on acceptance of this C.M petition the relief sought may be allowed and granted.



Appellant/Petitioner

Dated. 20/8/2019.



**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA PESHAWAR.**

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

In Service Appeal No. 196/ of2019.

Mst, Shahida Hussan VS Headmistress and others.

**AFFIDIVATE**

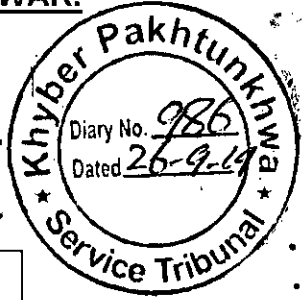
The petitioner/appellant do hereby solemnly affirm and declare on oath that the ground and contents as mentioned for the transferring of the appeal of the petitioner is ture real and fact.

Appellant/Petitioner

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA PESHAWAR.

Service Appeal No. 196/ of2019.

Mst, Shahida Hussan VS Headmistress and others.



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APPELLANT

Through Counsel

RAHIM KHAN

ADVOCAT HIGH COURT

OFFICE; at Distt; Courts Daggar Buner.

Cell= 03439049185

Dated; / /019

Put up to the Court with relevant appeal.

26/9/19

Reader

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA PESHAWAR.Service Appeal No. 196/ of2019.

Mst, Shahida Hussan VS. Headmistress and others.

REJOINDER

Respectfully sheweth.

Reply of Preliminary objections.

1. That the objection No.1 is incorrect and against the fact. The service appeal has been filed with in time.
2. That the appellant had disclosed all the facts which based the incident of administrative (impugned) transfer order of the appellant. Which is pertinent to be reproduced here in short that ( i ) both the respondent No.1 and 2 were intended to collect money by illegal means, in a shape of receiving un due amount of fine, from poor and innocent students, indirect through appellant. Which was denied hence on this lawful denial, both of them, have wrongly planned to take revenge of that, with mala fide intention and ill well. As for a long period, the resp; No.1 directly, while the resp; No.2 indirectly, put the appellant, under undue stress to subdue her, due to which, being a female having weak nervous, was suffered severely and resultantly, she become cardiac patient. ii) Then they took start and issued the impugned order with out any lawful grounds or adopting any lawful procedure, laid down for, by the E & D Rules 1973 and other relevent laws. iii ) As a pre requisite, conduction of inquiry was must, which was ignored, before passing the order impugned even the appellant had or has never heard in person, so she has been condemned un heard. Iv) The order impugned was without counterpart of the appellant and was therefore in clear violation of the relevant policy exists. v ) Even the infrest of students and of the public, both were also intended to suffer, while passing the order impugned in haste . vi ) But even the orders and directions of the respondent No.3, being their superior and provincial Head and competent authority , was also ignored and disobeyed, who, vide his endorsement dated, 15/11/018, had asked to consider the order impugnred and asked also vide letter, Ends; No.154 dated, 28/1/2018, to conduct inquiry against the respondent No.1 ( as both are on pages 39 & 40), which ultimately makes the order impugned, as disapproved by the competent authority . So the order impugned was also become void and illegal, on this score among other too. Vii) While as a matter of fact as the order impugned had become illegal, keeping in view the aforementioned aspects and also the appellant was so for, therefore rightly not relieved form her existing school /GGHS Gari Usmankhail , so she/the appellant has therefore continuesly been serving as such, there and have gotten achieved 100% result in the school. But wrongly, in violation of her fundamental rights, protected by the

constitution, of the Islamic Republic of Pakistan 1973 and beyond jurisdiction, the monthly salaries of the appellant have been stopped/attached and not paying for the last several months, on malafide intention and ill well. while the best teacher award, according to the policy exists, permissible to the appellant to be paid her, is also denied, unlawfully by respondents No.1 & 2, who have forcefully been refraining the appellant to sign/put her initial, in the daily attendance register (despite time and again request, to be permitted/allowed her to sign). VIII) while the mala fide game played by the respondents No.1 & 2 was for the purpose to unduly and unlawfully oblige the private respondent No.5, who was just recently recruited against N.T.S post, in school and under the policy, she was not entitle to transfer anywhere from that school, has subsequently illegally transferred to GGHS Gariusman Khail as PET. So that the objection of the appellant that vide the impugned order the post of PET in GGHS Gariusmankhail had left vacant, by ignoring the due requirement of the policy not to be left vacant, but an other blunder and illegality to which the respondents No.1 & 2 were under compulsion, mentally with un due expectations, just the private respondent No.5, could recoup their unlawfull demand as PET ie un due and illegal collection of fine from the innocent poor students etc, wold also be ensured un resistently. So the the respondents No.1 & 2 have committed dual illegality and blunder by passing mala fide order impugned and the other order impugned, not handed over of the private respondent No.5, and bothe are therefore not sustainable in the eyes of law but are liable to be set a side in favour of the appellant. Hence no concealment in fact was made and the para 2 is incorrect and against the fact. Because due to disclosing these facts not falls favourable to the respondents No.1 & 2, the situation in a shape of two orders impugned and un lawfully stoppage of the monthly salariy of the appellant was launched just to stressed and helpless, to be compelled, both physically and financially for unwarranted compliance of the order impugned. Which in no way is desirable under the law and under the constitution, need due consideration of this Honourable Tribunal.

3. That as per detail reply to the Para No.2 above, the appellant was transferred on nominal administrative ground for no fault of the appellant for ulterior motive, not for the public or students interest, but for the personal interest of respondents No.1 & 2. Hence the order was/is illegal and departmental representation of the appellant endorsed by the respondent No.3 to be considered, which is still pending on the grace of the resp; No.2, since then. So the same was unavoidable. The para No.3 is incorrect.
4. That as per detail reply against Para 2 above, para 4 of the comments is incorrect, hence denied.
5. That the appellant has properly filed the instant Service appeal and

challenged the order impugned, being void and illegal, just to unduly and against the law without justification and reasonable grounds the appellant has been on mala fide intention and ill will, just to victimize the appellant and unduly just to favour the private respondent No.5. Hence comments against the para No.4 is incorrect and denied.

6. That as per detail reply against Para No.2 above, the comments against para No.6 is incorrect and baseless, hence denied. Grounds of the appeal are reasonable and genuine. The appeal is competent and maintainable under the law.
7. That this honourable Service Tribunal has full jurisdiction and mandate to entertain the instant appeal. Hence denied the para 7.

#### REPLY TO THE COMMENTS ON FACTS

1. That the comments against para No.1 of the facts is baseless and is mere exaggeration. The entire service career of the appellant remained excellent as she has extra ordinary professional and academic qualification and also having handsome skill as a teacher generally and specially as PET. However copies annexed as page 5 & 6 is not trustworthy because no copy of the same was endorsed and no more documents or correspondence has annexed. While the papers annexed as "B" page 8 to 11 all are ex parte and also mala fide, but al be it, it is indicative that the appellant was innocent and for no reason she has been tried to blame for the action impugned, which is also of no legal value and trustworthy and will be discussed at the time of arguments. Hence denied.
2. That the comments are not proper. However the appellant has been victimizing wrongly by the respondents No.1 & 2 from whom no expectation of just can be attached. However denied the para.
3. That the comments are wrong and against the facts. The appellant has been transferred vide order impugned under nominal administrative grounds, on mala fide intention, without counterpart of the appellant, against the public interest, on ulterior motive, just to transfer against the NTS policy, premature, the respondent No.5, being eye blue of the respondents No.1 & 2, just to collect un due and illegal money in a shape of illegal fine from poor and innocent students of the school concerned (already denied by the appellant). Hence denied the comment against the para 3.
4. That the comments against the para No.4 are totally wrong and baseless. It is most pertinent to mention here that no unlawful and illegal order of any authority, is binding on any subordinate of that authority, to comply with, as per verdict of the august Supreme court of Pakistan. The verdict "no work no pay" is not applicable in the present case of appellant, as she has continuously been

performing her duty in GGHS G/usmankhail as such, because she has so far not been relieved by any one of the respondents. While the order impugned is also not effective, after endorsement dt, 15/11/018, of the respondent No.3, to be considered. Which is

laying still on the grace of the respondent No.2, without any reference on. Which means that the same order impugned has not been approved by the competent authority/respondent No.3, being Provincial head. While the respondent No.3 vide his letter dt,28/1/018(019)on p-40 ,has already asked to be inquired and probed in to against the respondent No.1, but no action on, but this is not for the 1<sup>st</sup> time that respondent No.2 has wrongly favoured respondent No.1 , she had always been un duly favoured as per annexure on pag.11 of this comments, under recommendations at s.No.1 read with s.No.5& 6 of the conclusions, on the same page. Perusal of the same contents also prove and clarify itself that the so called inquiry proceeding , (proposed by respondents No. 1 & 2) unavoidably concluded as reproduced, " the school has low enrolment, having 19 Teaching staff, The statements of the pet/appellant and H/M( res; No.1 ) indicate that there is SOME PERSONAL GRUDGES BETWEEN THEM , Warning may be issued to the H/M for her loose administration and may be directed to make(ensure) cooperation with the subordinate and try to keep the atmosphere conducive and peaceful for teaching learning process." Which proves it also that the respondent No.1 has personal grudges with the appellant and although there was a huge strength of numbering 19 teaching staff out of whom only the appellant was wrongly targeted although according to annexed page 15 at S.No.3, the other mistresses of the school i.e DM, AT, TT, QARIA ETC REFUESED TO TAKE VCANT PERIOD/SUBJECTS. But the temper and behavior of the resp; No1 & 2, with those other teaching staff was normal and cold ie discriminative, as the same not misconduct or refusal from Govt; Duty, while the same charge, though was baseless, but discriminately resulted for passing of the order impugned. While intimation of the said so called inquiry was also not given to the appellant but on sided discredited to the appellant wrongly.

- 5. The para No.5 of the comments is ambiguous which tantamount to evasive denial. Which is admission in other wards in fact.
- 6. That as per admission of the respondents, in para 6, the order impugned was on administrative grounds, but also was on mala fide intention and had lost its effect after the endorsement by the respondent No.3,being competent authority, on dt,15/11/2018, as the same is still on the grace of respondent No.2, for consideration. Therefore the appellant has so far not been relieved and she is still performing her duty in GGHS G. usmankhail. So she is entitled to her monthly salaries and other privileges in routine. which is wrongly stopped to pay , while on achieving of hundred percent result the appellant is also entitle the to best teacher award according to policy which has also denied to pay. Which should be paid immediately, this is a request of the appellant. Because the stoppage impugned are beyond jurisdiction of the respondents as only court has jurisdiction to attach or stop salary of civil servant.

REJOINDER AGAINST COMMENTS ON GROUNDS.


- A. That the comments are irrelevant and evasive, which tantamount to admission. However denied what stated in. while in detail the stance of the appellant has been supported in length with proof above even against Para 2 preliminary and even No.4 of facts .
- B. That as replied above against para "A" of the grounds the reply against this para may be considered as like that.
- C. That the comments are wrong and denied. No any inquiry was conducted before passing the order impugned dated 30/10/2018 and similarly no show cause notice either 1<sup>st</sup> or final has been served up on the appellant. However copy of so called show cause notice annexed with the comment in hand is of date,04/02/2019, not of the period, before passing of the order impugned dated,30/10/2018. So this fact is an admitted one between the parties that the order impugned was one passed on administrative grounds and was without any show cause Notice to has been served up on the appellant by the respondents, before issuing of the same order impugned . While no intimation or information in, even in a shape of endorsement had been made to the appellant, as per so called annexure "C" on p-9 . So the order impugned was/is not a lawful one therefore not sustain in the eyes of law. And Need to be declared as null and void in favour of the appellant.
- D. That the comments against the para "D" above the same is evasive denial and tantamount to admission. So the para "D" of the service appeal stands as admitted. Hence the claim is legal and correct.
- E. That as per reply against para "D" above. The facts claimed by the appellant is tantamount to admission by the respondents.
- F. That as per reply against para "D" above. The facts claimed by the appellant admitted by the respondents.
- G. That as per reply against para "D" above. The claim is still standing which tantamount to admission, because no appointment order or any proof to this effect that the post of private respondent No.5 was not NTS, which is not transferable according to the policy or that the tenure of resp; No.5 was more than three years on her previous station and that why she was not included in the order impugned dated,30/10/018, or that why copy of the appointment and transfer orders both of resp; No.5 is not being handing over to the appellant and kept secret. While the so called certificate 03/4/019, has no specification of dated or duration and notification are not trustworthy

the order on p-25 is of 5/1/018. Hence denied.

- H. That the question of inquiry was put on to have not been made before passing the order impugned dt,30/10/018, while reference of letter dt,22/2/019 has been given. So the comments are irrelevant and is mere escaping to comment on fact. Hence the same is denied .
- I. That no reply but the points raised in this rejoinder will be argued at the time of arguments.

Therefore it is humbly prayed that on acceptance of this rejoinder the appeal of the appellant may graciously be allowed by sitting a side the order impugned dated 30/10/2018, with the direction to release the outstanding monthly salaries in a shape of arrears without further break in routine payment for future and also the respondent No.4 may be asked to conduct impartial inquiry against the respondents No.1 & 2 for misuse of their official powers . Further relief to which the appellant is entitle under the law though not specifically prayed for, in the service appeal may also be granted to the appellant .

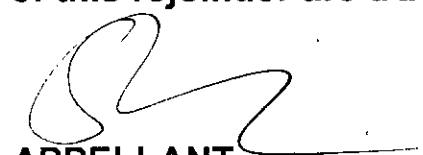
  
**APPELLAN**

Through Counsel   
**RAHIM KHAN**  
 ADVOCAT HIGH COURT  
 OFFICE; at Distt; Courts Daggar Buner.  
 Cell= 03439049185

Dated;. / /019.

**CERTIFICATE ;**

**Certified that the entire contents of this rejoinder are true and correct.**

  
**APPELLANT**



**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOON KHWA PESHAWAR.**

Service Appeal No. 196/ of2019.

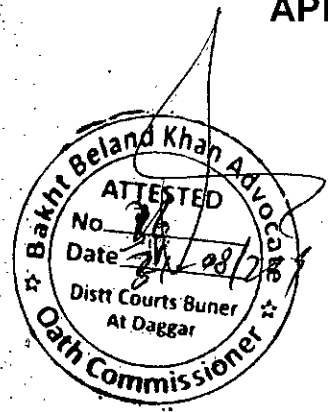
Mst, Shahida Hussan VS Headmistress and others.

**REJOINDER**

**A F F I D I V I T**

I, Mst, Shahida Hassan PET, GGH School Gari Usman Khail /Appellant, do hereby solemnly affirm and declare on oath that the entire contents of this Rejoinder are true and correct and that no such like rejoinder has earlier been filed before this honourable Tribunal.

**APPELLANT/DEPONENT.**



8) محترمہ ڈی ای او عدالت عالیہ ضلع ملتان

ضباب عالیہ - تعلیم اعلیٰ گھڑی عثمانی خیل آپ کی توجہ اپنے

حکومتوں کے لئے کیوں کے باقی سکولوں کی مسائل کی طرف دل دیا جائے جس جو مسلسل تین سالوں سے چلے آ رہے ہیں۔ جو کہ گھڑی عثمانی خیل کے عزیز اور نادر بچوں کیساتھ بہت زیادتی ہیں۔

سکول کے صدر مسٹر حسین باسین بیگم اپنے نایاب عمر اخیر سے باز نہیں آئی اور مسلسل بچوں سے داخلہ میں اضافی 30 روپے وصول کرتے ہیں۔ بلکہ 1994 اور 10th کلاسوں سے اضافی 40 روپے وصول کرتے ہیں۔

جب ہمیں صدر مسٹر حسین عدالت سے رابطہ کیا تو صدر مسٹر حسین کہتی تھے کہ یہ زیر و فنڈ ہے۔ یہ زیر و فنڈ کیا ہے جیسے یہ 9 اور انہیں زیر و فنڈ کی قانونی حیثیت دیا جائے۔

یہ کیا صدر مسٹر حسین صاحب کے پاس کٹ مینی میں چلے جاتے ہیں۔

ضباب عالیہ - تعلیم اعلیٰ گھڑی عثمانی کے حور میں سکول گئی تو

صدر مسٹر حسین باسین بیگم نے فرمایا کہ یہ زیر و فنڈ ہے یہ ہم وصول کرتے ہیں اور جو بچیاں زیر و فنڈ میں دیتے وہ بچیاں سکول سے داخلہ نہیں لے سکتے۔

ضباب عالیہ - صدر مسٹر حسین باسین بیگم نے اور بچوں سے جبرمان وصول کرتے ہیں۔ کئی جبرمان بچوں اور کئی بچوں کو منہ پر وصول کرتے ہیں۔

ہم عزیز لوگ بچوں کیلئے 10 روپے وصول کرتے ہیں وہ بھی جبرمان PET جبرمان کی شکل میں وصول کرتے ہیں۔

17.5  
وکیل  
ملتان

معم احمدیان گھری عثمانی ضلع اسٹیٹ پرنسز مینٹ کر رہے ہیں۔

جناب والدہ لطف بخش اپنے بچے جو سارا سارا دن جو بائیل پیر مصروف رہتے ہیں ان ٹیچرز میں سے ایک ٹیچر میں فیراز احمد SDM ہے۔ پیر پڑھنے کے دوران ان میں سے جو بائیل استعمال کرتے ہیں اور عثمانی عرواقت سے بچوں کی فریڈنٹ بگاڑ دیتے ہیں۔ اگر آپ صاحبان کو طرف سے کوئی ایسا فیراز شخص آتا اور کلاس میں جا کر بچوں سے فریڈنٹ لے لے تو یہ حقیقت سامنے آ جائے گی۔

جناب والدہ 19-2018 کا نتیجہ نکل چکا ہے اور کلاس 7th A کی نوٹس طلبہ 58 ہیں۔ اس کلاس میں میں فیراز احمد SDM کا ڈرائنگ کا رزلٹ 44 فیصد ہے۔ یعنی 34 طلبہ ضلع میں اور 24 پاس ہیں۔ اس رزلٹ سے صاف نظر آتا ہے کہ میں فیراز احمد SDM ٹیچنگ میں دلچسپی نہیں لیتے اور سارا دن جو بائیل پیر مصروف رہتے ہیں۔ کیا یہ فیراز کو میں فیراز احمد SDM نظر نہیں آ رہا ہے یا اس کے ساتھ کوئی خرابی ہے یا وہ بچے کو فریڈنٹ لے رہے ہیں۔

اور اس نقصان کا آزالہ کون کرے گی۔ اس کے بعد ہم اہلکاروں گھری عثمانی ضلع پر ضرورت کرتے ہیں۔ تم میرا یہ بچوں کو پاس کرنا

مشکوٰۃ فیراز احمد مندرجہ بالا سببوں کی آڑ میں اسکو ڈرائنگ

جناب والدہ جب ہم فیراز میں صاحبان سے رابطہ کیا تو وہ کہیں یہ

معم احمدیان گھری عثمانی ضلع اسٹیٹ پرنسز مینٹ کر رہے ہیں۔

کہ یہ میری طرف سے ہے میں جو ہا میں سے وہی کوئی

میں جو میری طرف سے ہے میں جو ہا میں سے وہی کوئی

کہ یہ میری طرف سے ہے میں جو ہا میں سے وہی کوئی

اور یہ میری طرف سے ہے میں جو ہا میں سے وہی کوئی

کہ یہ میری طرف سے ہے میں جو ہا میں سے وہی کوئی

کہ یہ میری طرف سے ہے میں جو ہا میں سے وہی کوئی

نقول برائے شہرہ کی ارواں

① سیکریٹری محکمہ تعلیم ضلعہ بہاولپور

② ڈائریکٹر محکمہ تعلیم ضلعہ بہاولپور

اصل سے کاپی واپس

میں ملتا ہے اس کے ساتھ

D. (F) Mkd  
DESPATCHER  
Mkd at Bathhela  
e8/04/2019

CPZ

میں ملتا ہے اس کے ساتھ

03348413859 - 032182012419

(11)

15401-2611618-1

علامہ حبیب ناظم بگڑی نئی نئی

Chulani Habib  
Nazim  
VIC & U Khet No-1

مسین محمد  
15401-5487783-3

15401-5601783-5  
محمد رفیق

علامہ رحمن  
15401-4905437-5

15401-7841163-9  
شہناز

15401-5335431-5

15401-9465975-7  
فہمیدہ

محمد بان - 03347100521

15401-9169796-3  
عبدالرشید

محمد بان  
محمد بان  
محمد بان

15401-8020838-1  
میرا سیر خانہ

15401-3904814-5  
ذیشان