

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 10.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

Appellant Deposited
Security & Process Fee

That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

Points urged need consideration: Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.



Chairman
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn. File be consigned to the record room.




Chairman
Camp Court A/Abad
20.10.15

ANNOUNCED
20.10.2015

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 772/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.07.2015	<p>The appeal of Mst. Alyia Bibi presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 772/2015

Alyia Bibi D/O Ali Khan (Qaria GGHS Sangar) Afzal Abad R/O
Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

INEX

S.No	Prescription of Document	Annexure	page
1			1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-17
4	Copy of appointment order and corrigendum	"C"	18-19
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	20-23
6	Copy of impugned dismissal order of appellant	"E"	24
7	Copy of departmental appeal /representation	"F"	25
8	Copy of merit list	"G"	26
9	Wakalatnama		

Dated: 2/3/2015

Alyia Bibi
Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 779/15

① K. P. Province
Service Tribunal
Diary No. 785
Dated 8-7-2015

Alyia Bibi D/O Ali Khan (Qaria GGHS Sangar) Afzal Abad R/O
Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

SERVICE APPEAL.

Service Appeal u/s 4 of KPK Service
Tribunal, 1974

Filed today
8/7/15

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is as under:-

1. That, respondent No 3 announced the posts of Qaria in Dailly "The Aaj" dated 20/5/2011 for appointment of Qaria. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of Qaria. Copy of Advertisement is annexed as Annexure "A"

6

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, Hifz, tajweed, teaching of tajweed, Shahadat ul Almia from registered Institution/ Maddaris. Copies of Documents/testimonial are annexed as Annexure "B"
3. That, following this, the appellant was appointed as Qaria in respondents' Department on the basis of merits and was posted in GGHS Afzal abad vide appointment order endrst No 893/942/ ESTT Qaria (F) APPTT; (f) 2012 Dated 16/6/2012. Copy of appointment order and corrigendum is annexed as Annexure "C".
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 16.6.2012 onwards.
5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1636-45/AE-J/ESTB on 3.3.2015.
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi DEO, Shamim Akhtar was found attached with the show cause notice, wherein it

③

was mentioned against the name of appellant that "No relevant, sannad for appointment and the appointment is not valid and is against the recruitment policy". Copy of Show cause notice and one page of inquiry of the then EDO is annexed as Annexure "D". AS the inquiry committee did recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of Qaria and appeared in ETTA Test vide Roll No 454 dated 22.6.2011 and was placed at S. No 9 of the merits list and thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their sannads of Hifz and tajweed from registered institutions are to be appointed "as per service structure in prescribe rules the sannad of Qirat from a recognized Institution meant a certificate obtained from Maddaris/Intuition Registered by the Govt. of KPK.
8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi

④

required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1726-35/AE-1/Estb dated 3.3.2015. Copy of impugned dismissal order of appellant is attached as annexure "E".

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 10.3.2015. Copy of departmental appeal /representation is attached as annexure "F" but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

GROUND

- a. That, the appellant fulfilled the criteria of appointment as Qaria being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed at S.No 10 of the merit list. Copy of merit list is attached as Annexure "G". Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

5

- b. That, as per educational record annexed with the appeal, the appellant has been appointed as Qaria according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that no institution/madaris of female is not recognized in KPK since 1969 onwards. Therefore Qarias were appointed in Education Department prior to 2012 on the basis of sannads similar to that of appellant. Therefore if hundreds of female Qarias are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.
- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as Qaria . But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an

6

employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.

- e. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.
- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, right from the appointment of the appellant as Qaria in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- h. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of

5

removal of Umar-Kundi from service, the appellant cannot be dismissed for the acts committee by the ex-EDO.


- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order endrst. No 1636-45/AE-1/Estb dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 7/7/2015

Ali Rabi
Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

8

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Alyia Bibi D/O Ali Khan (Qaria GGHS Sangar) Afzal Abad R/O
Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

APPLICATION FOR SUSPENSION
OF IMPUGNED ORDER NO ³³~~75~~ AND
GRANT OF STATUS QUO TILL
FINAL DISPOSAL OF THE MAIN
APPEAL.

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Masehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

9

applicant has not been contested by any one as there was no contesting rival candidate.

5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: -----/2015

Appellant

Through

Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

16

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Alyia Bibi D/O Ali Khan (Qaria GGHS Sangar) Afzal Abad R/O
Tehsil & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

AFFIDAVIT

I, Alyia Bibi D/O Ali Khan (Qaria GGHS Sangar) Afzal Abad R/O Tehsil & District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 7/7/2015


Deponent

حکومت پاکستان سے منظور شدہ
(سینئر ٹیچر نمبر 2810)

دارالعلوم جامعہ عربیہ اسلامیہ مدرسہ القرآن پاکستان
پتہ: نزدیکی کلاں، ضلع مظفر آباد، پاکستان

شہادۃ التجوید القرآن
بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Annex 13
P-12

الحمد لله رب العالمين وانصليقة والسلاوة على حاتم الانبياء والسلمين وعنى الله وصحبه احسب ان امان بعد الاقان
الطالب / الطالبة **عاليه بي بي علي خان** من **مالسپره**
قد بلغ من تجويد القرآن الكريم في مدرستنا دارالعلوم جامعہ محمدية عربيہ تدریس القرآن والحديث (مسترد)
خبر حكايا مانسهره باكستان المولود / المولودة في عام 1988-02-01 ونجح ونجحت في الاختبار السنوي عام
1423هـ بتقدير **ممتاز** وبناء على ذلك استحق / استحققت الشهادة التجويد
ويوجه ابو صيها بتقوى الله عز وجل لخدمة التجويد القرآن الكريم. والله الصوفى المعين.



ختم المدرس
توقيع مدير الجامعة
(مولانا) محمد راج الدين محمد
مدرس دارالعلوم خواجهان

توقيع مدير المدرسين
Attested
HEAD MISTRESS
Govt Girls High School
Afzal Abad

توقيع الامين العام
قاری مولانا
واقف محمد سيف الدين محمدی
خواجگان

رقم الشهادة ۲۶۲
مجموع الامتحان (400)
الدرجات المحصلة ۲۸۵
التاريخ الاخير 1-10-2002
محل الاصدار **خواجگان مالسپره**

APX 10
Muh...
Distt. Courts
Gorakhpur

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



شهادة حفظ القرآن الكريم



الحمد لله رب العالمين، والصلاة والسلام على خاتم النبيين، سيدنا محمد وعلى آله وصحبه اجمعين، وبعد :
تتهجد رئاسة وفاق المدارس العربية بباكستان، بأن الطالبة عالمة بي بي

بنت علي خان من مانسهره المولودة ١٤٠٨ هـ / ١٩٨٨ م

قد حفظت القرآن الكريم كاملاً بظهور الغيب في تعليم القرآن للبنات تدرجتي مانسهره عام ١٤٢٠م / ١٩٩٩م. ونجحت في اختبار الحفظ المنعقد تحت إشراف وفاق المدارس العربية بتقدير ممتاز. وبناءً على ذلك قرر مجلس الوفاق منحها شهادة حفظ القرآن الكريم ورئيس الوفاق اذ يمنحها هذه الشهادة يوصيها بتقوى الله عز وجل، وأن تتعاهد القرآن الكريم بتلاوته أثناء الليل واطراف النهار، وان تعمل بتعاليمه، التمسحاً وأن تعلمه غيرها، والله الموفق.

Attested

Head Mistress
Govt Girls High School
Abar



مدرسة الفتيات
مانسهره
شهادة حفظ القرآن الكريم
مجلس الوفاق

رئيسة الوفاق
مجلس الوفاق
مدرسة الفتيات
مانسهره

رقم التسجيل ١١٩٤١٩٣ / ١٩٩٩م / ١٢ / ٢٠١٩م / ١٢ / ١٩٩٩م
رقم الشهادة ١٣٤٩٨٦ / ١٠ / ٩١ / ١٠ / ١٩٩٩م

Dist: Gujrat
Abotkhwa

14



Certificate of Registration of Societies. ACT XXI OF 1860.

No. 2810 /5/670. Date 21/10/1985.

I hereby certify that DARUL-ULOOM MOHAMMADIA
ARABIA, TADREES-UL-QURAN, KHAWAJGAN, TEHSIL: AND
DISTRICT: MANSEHRA (HAZARA),

has this day been registered under the Societies' Registration Act, XXI of 1860.

Given under my hand at PESHAWAR

this 21st day of Oct (1985),
one thousand nine hundred and Eighty Five, (1985).

[Signature]
Registrar of Joint Stock Companies
& Societies, N.W.F.P., Peshawar.

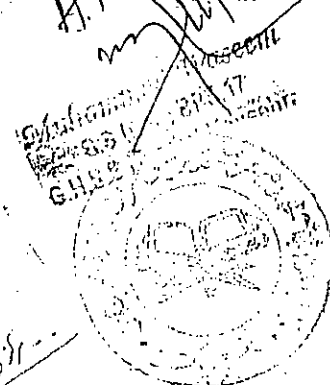
S. C. 36.

GS&PD, NWFP.—782 F. of Ind. 10-12-78—(7)

Attested
Zahid

HEAD MISTRESS
Govt Girls High School
Afzal Abad

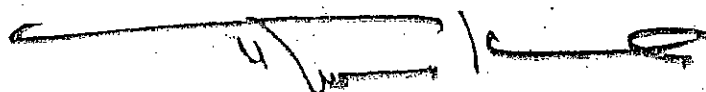
[Signature]



[Arabic text stamp]

Attested

[Signature]
District Registrar
Peshawar



15

339088

Sr. No. AD

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(Class X)



Session 2004 (Supplementary)
Group (HUMANITIES GROUP)

Name: Alia Bibi

Father's Name: Ali Khan

Roll No 2270

Subjects	Marks	MARKS OBTAINED			
		Theory/A	Prac/ B	Total	In Words
1. English	150	25	26	51	Fifty-One
2. Urdu	150	41	43	84	Eighty-Four
3. Islamiyat	75	42		42	Forty-Two
4. Pakistan Study	75	29		29	Twenty-Nine
5. Maths	100	39		39	Thirty-Nine
6. G. Science	100	35		35	Thirty-Five
7. Isl: Studies	100	49		49	Forty-Nine
8. Mbh	100	49		49	Forty-Nine

Total 850

378-D Three Hundred Seventy-Eight Only

Remarks

Checked By: [Signature]

Date: 04-11-2004

Note: Error / Omission are excepted
Computer Section BISE, Abbottabad

Controller of Examinations
BISE Abbottabad

Attested
[Signature]
Muhammad Waseem
S.S (Eng) BPS 17
G.S Dhodial Manshree

[Signature]
Muhammad Arshad
Man Tany
[Illegible]

ADS No 043218

Roll No. 2270

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION SUPPLEMENTARY 2004

This is to certify that ALIA BIBI
Son/Daughter of ALI KHAN

A candidate from MANSEHRA DISTRICT
has passed the Secondary School Certificate Examination of the Board of
Intermediate and Secondary Education, Abbottabad held in September 2004 as a
Regular/Private Candidate. He/She obtained 378 marks out of 850 and has been
placed in Grade D Representing FAIR.

The candidate passed in the following subjects.

- | | | | |
|------------|---------------|-----------------|----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS | 6. G. SCIENCE | 7. ISL: STUDIES | 8. MBH |

Date of Birth according to admission form is TWENTY-SEVENTH JUNE

One Thousand Nine Hundred and EIGHTY-EIGHT (27-06-1988)

[Signature]
Asstt. Secretary

This certificate is issued without alteration or erasure.

[Signature]
Secretary

[Signature]
Muhammad
S.S (Enb.
G.H.S Dhodia Mansehra.

[Signature]
Muhammad Asif
Asstt. Secretary Abbottabad

ADA 062065

Roll No. 47466

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan

HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE

SESSION ANNUAL 2006

Humanities Group

This is to certify that ALIA BIBI

Daughter of ALI KHAN

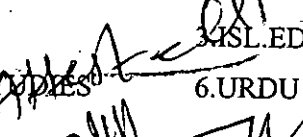
A candidate from MANSEHRA DISTRICT

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 2006 as a Private Candidate. She has obtained 536 marks out of 1100 and has been placed in Grade D. Representing FAIR.

The Examination was taken as a Whole/In-Parts and the candidate passed in the following subjects:

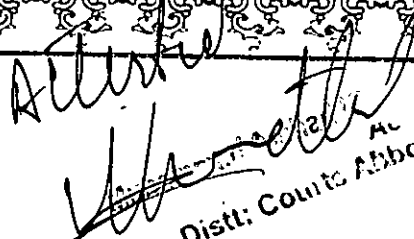
- | | | |
|------------|--------------------|-------------------------|
| 1. ENGLISH | 2. URDU | 3. ISL. EDU-PAK STUDIES |
| 4. CIVICS | 5. ISLAMIC STUDIES | 6. URDU (ADVANCE) |


Asstt. Secretary


Muhammad Wassem
S.S (Eng) BPS, 11
G.H.S. Dhodial Mansehra

This certificate is issued without alteration or erasure.


Secretary


Distt. Controller, Abbottabad

Amey C,

(18)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANS...

ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following **Qaria teachers (Female)** against vacant posts mentioned against each in BPS-9 @ Rs.6200-380-17600 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

S#	Name	Father Name	Address	Place of Posting	Remarks
1	BIBI BUSHRA	FIDA HUSSAN	MANGLOOR	GGHS HASSA	AVI Post
2	SHAZIA	M AFZAL KHAN	BANDA GESUCHI	GGHS JABORI	AVI Post
3	FATIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DOGA	AVI Post
4	FARHAT BIBI	M.HAMAYUN	DHODIAL	GGHS DYARYAL	AVI Post
5	MANAZZA	MOHD HAMYUN	TRANGRI BALA	GGHS MURAD PUR	AVI Post
6	MADHIA BIBI	ALI KHAN	AFZALABAD	GGHS AFZAL ABAD	AVI Post
7	BIBI SAEEDA SALAMA	FIDA HUSAIN	MANGLOOR	GGHS THATHI KHURD	AVI Post
8	ASMAT BIBI	ABDUL REHMAN	LASSAN NAWAB	GGHS LASSAN NAWAB	AVI Post
9	BIBI MARIUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	AVI Post
10	SAMMIYA RAHIEM	RAHIM SHAH	OGHI MANSEHRA	GGHS OGHII	AVI Post
11	SAIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLIAN	AVI Post
12	ALYIA BIBI	ALI KHAN	AFZALABAD	GGHS SANGAR	AVI Post
13	AYSHA KANWAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID ALI	AVI Post
14	AMBER ZEB	ALAM ZEB	PHULRA	GGHS PHULRA	AVI Post
15	AISHA BANO	SHAHZADA	M.M.POLE MANSEHRA	GGHS BAFFA	AVI Post
16	BUSHRA BIBI	LAL KHAN	PHULRA	GGHS SAWAN MAIRA	AVI Post
17	MAMOONA WAJID	WAJID	BHERKUND	GGHS GHANOL	AVI Post
18	HAMEEDA	MOHD YOUSAF	PHULRA	GGHS JARED	AVI Post
19	TABSUM	MOHD NAZIR	OGHI MANSEHRA	GGHS TRAWRA	AVI Post
20	SABA NOOR	SHEIKH NOOR ELLAHI	MANSEHRA	GGHS TALHATA	AVI Post
21	ASMA NAZ	RAJA MANZOOR HUSSAIN	BEHALI	GGHS MOHAYIAN	AVI Post

Note: The pay of the candidates, falls at S# 1, 8, 16 & 20 will be effective from 01/09/2012 after the re-opening of summer vacations Zone Schools.

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will be stand automatically cancelled.

Attended

[Signature]
Distt. Commr. Abbottabad

[Signature]

19

4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. They will submit to this office, their all testimonial/Registration copy of their Madrasa (Institutions), along with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the (a) receipt of verified documents by the appointing authority / (EDO E&SE Manshira) (b) duly attested & verified registration copy of the concerned Dini Madrassa (Institutions), where he/she has obtained his/her Sanad/Certificate.
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Manshira.
11. They may not be handed over the charge if their age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in pervious post, their entitled for pension / gratuity etc.
13. No. TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No 893-962 /Estt: (F)Apptt: Qaria (F)/2012 Dated Manshira the 16/6/ 2012

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Manshira.
- 4-5. District Officer (M&F) Local Office.
- 6-26. Principal/Headmistresses School concerned.
27. PA to District Coordination Officer, Manshira.
28. Budget & Accounts Officer, local office, Manshira.
- 29-50. Candidates concerned.

Attest
Muhammad Afzal Tanoli
Advocate
Distt: Courts Abbottabad


EXECUTIVE DISTRICT OFFICER,
E&SE MANSEHRA



Annex D

20

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

7739- D/O 2011 Email: deofm,anselra@yahoo.com
Dated: 29/9/2011 Phone & Fax: 0997-302518

To: Headmistress,
Govt. Girls High School
Senger.

Subject:

SHOW CAUSE NOTICE

Memo

Show Cause notice in respect of Mst Aliya Bibi Dania D/O
Ali Khem of your school is attached herewith. You are
directed to serve the same to the teacher concerned and return one copy to this
office as a token of receipt.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

Encl: No

Copy to the:

- 1. Deputy Commissioner, Manselra
- 2. District Monitoring Unit, Manselra
- 3. Sub Divisional Education Officer (Female) Manshra.
- 4. ADEO Circle concerned is directed to ensure the attendance by the concerned teacher.

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

Attested
Muhammad
Advocate
Distt: Courts Abbottabad



21

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7739/7739 / Establishment/ 2014
Dated: 23/9/ / 2014

Email: deofmansehra@yahoo.com
Phone & Fax: 0997-302518

SHOW CAUSE NOTICE

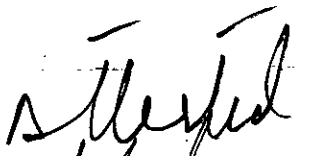
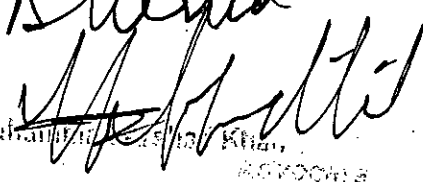
I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) rules, 2011, do hereby serve you Mst Aliya Bibi D/O Ali Khan Qaria, Govt: Girls High School Sangar Mansehra, Show cause Notice as follows:

1) You were appointed as **Qaria** at GGHS-Sangar, vide defunct Executive District Officer (E&SE) Mansehra Endstt: No 893-942/Estt Qaria (f)/2012 Dated 16.06.2012 where you were stranger for recruitment process initiated through EATA: Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will & wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.

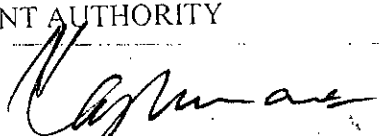
2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:-

I am satisfied that you have committed the following acts/Omissions specified in rules.

- Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
 - Inflicted huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
 - By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for un lawful appointment with coordination of then EDO.
- As a result thereof, I as competent authority have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
 - You are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
 - If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.
 - A copy of the finding inquiry committee related page is enclosed.



Mst Aliya Bibi
Govt: Girls High School
Sangar Mansehra

COMPETENT AUTHORITY


District Education Officer
(Female) Mansehra

9

Interestingly the aforementioned minutes / record of the DSC was not made at the office of the District Officer (Female) Mansehra and the same were, however, sent through Fax from office of the DO (M) Mansehra after frequent requests (Enc-XI).

The following irregularities have been found in the appointments of Qarias.

NAME & FATHER'S NAME	PLACE OF POSTING	Facts	Remarks
Eishra Fida	GGHS Hussa	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
S/O Farmanad	GGHS Jabori	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Fida	GGHS Doga	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Fida	GGHS Dyaryal	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
M	GGHS Muradpur	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
D/O Ali	GGHS Afzal Abad.	Sanad Hifz ul Quran from wafaq but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Sayda D/O	GGHS Thathi Klundi	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Abdul	GGHS Lashan Nawab	No Sanad Sanad Hifz ul Quran and No Sanad Qirrat	The appointment is not valid and is against the recruitment rule/policy
Maryum Fida	GGHS Pairan	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Shah Shah	GGHS Oghi	Sanad Hifz ul Quran is from recognized institution but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy.
Bibi Fida	GGHS Danda Khorian	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Khan	GGHS Sangar	Sanad Hifz ul Quran is from recognized institution but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy

Attested
 M. A. Khan
 Distt. Courts Abbottabad

Aliya Bibi

D/O Ali Khan

Qaria BPS-17

G.GHS Sangar Mansehra

(23)

To,

The Office of the DO (F)
Mansehra

Sub: Response of show cause notice

Memo:

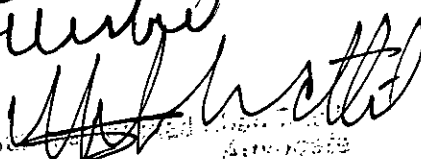
1. It is submitted for your kind attention that I have been appointed as Qaria at GGHS Sangar vide no longer existing Executive District Officer (E&SE) Mansehra Endstt: No. 893-942/Estt Qaria (F) 2012 dated 16-06-2012.
2. We were recommended and recruited by the competent Authority i.e. Departmental selection committee after passing EATA test and checking our original Documents along with professional registered certificate about relevant job.
3. Further District account officer and other concerned Department have furnished our verified documents before releasing pay.
4. We were required to submit attested copies of all related documents to the EDO (S&L) concerned. Who checked our original Certificates/Degrees before handing over the charge.
5. Appointments were made purely on merit.
6. No element of faked/bogus appointment found any where even than the competent authority has tentatively decided to impose major penalty of dismissal from service upon me which is quite unlawful and uninviting. Therefore I apologise that my appointment is totally based on merit and through proper channel No such action should be taken against me.

The authority should secure my career and service. Thanking you in anticipation.

Sincerely yours

Aliya Bibi D/O Ali Khan
Qaria at GGHS Sangar

Dated 30-10-2014

Attested

 Muh...
 Distt: District Attock

یہ دستخط اور توثیق کے لئے کاغذ اور پاپا اختیار ہے۔
 بالیت ایف ڈی آر کے ذریعہ



Arrey E

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

P-24

- 1:- Where as Mst: Alyia Bibi D/O Ali Khan working as DA GGHS/GGMS/GGP Sangar was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.
 - i) Syed hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
 - ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Alyia Bibi D/O Ali Khan DA GGHS/GGMS/GGPs Sangar.

(Signature)

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1575-85 /AE- 1 /Estab: dated 03/03 /2015.
Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress GBHS- Sangar.
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: Alyia Bibi Arria
10. Office File.

Attested
(Signature)

(Signature)

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Annex F

Dated 10.03.2015

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

(25)

Subject: DEPARTMENTAL REPRESENTATION/APEAL

Respected Sir,

It is submitted in your honour that I had been appointed Qaria Teacher vide DEO(F&ESE) Manshura order No. 893-942/Estt Qaria(F)/2012 dated 16.06.2012 Annexure "A".

The said vacancy had been advertised in a local daily "AAJ", Abbottabad dated 20.05.2011. (Annexure "B"). I applied for the said post and took STBA test vide Roll No. 454, serial No. 9 dated 22.06.2011 and passed the same and was also called for interview.

After completing the aforementioned formalities, I was appointed Qaria Teacher BPS-09 at GGHS, Sanghar against the available vacant post.

I joined duty at GGHS on 13.06.2012 and have been serving there 06.03.2015.

On 23.10.2014 I was served a show cause notice by DEO(Female) Manshura vide No. 7739/Establishment/2014 dated 29.09.2014 alongwith enclosure alleging therein that my recruitment was made without due process of recruitment etc (Annexure "C") while as per enclosure "Sanad Hifzul Quran is from wifaq but Sanad Qirat is not from recognized institution", hence appointment is not valid and is against the recruitment rule/policy. (Annexure "D").

The undersigned submitted her reply (Annexure "E") alongwith the documentary proof that I was inducted after due process and my sanads were issued by "Darul Uloom Muhammadia Arabia Tadrees-Ul-Quran Khawajgan", which is recognized by Rabta Tul Madaris Pakistan, Multan vide registration No. 2810. (Copies of sanads and affiliation are enclosed as Annexure "F", "G", "H" & "I").

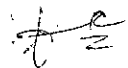
The DEO Manshura, without due consideration to the above facts and without personal hearing dismissed the undersigned from service vide notification No. 1575 BS/AE-J/Estt, dated 03.03.2015. (Annexure "J").

Since my degrees are original and I possess much higher education than the prescribed qualification and the institute is recognized by Wafaqul Madaris, Pakistan. Moreover I had been posted after observing due process by the department.

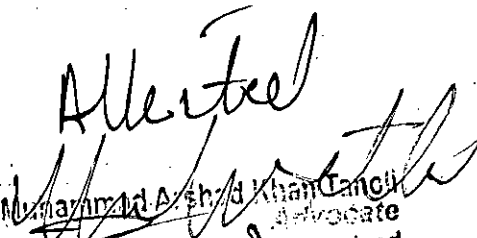
It is, therefore, requested that I may kindly be re-instated into service after revoking the whimsical and unlawful order of DEO(Female) Manshura.

Thanking you in anticipation.

Sincerely yours


Alia Bibi
Ex-ama teacher
GGHS Sanghar

Address: -
Alia Bibi
v/o Post office Shoukat Abad
Tehsil and District Manshura
Cell#0331-9324795


Muhammad Ashraf Khan
Advocate
Distt. Courts Abbottabad

Annex 6 21 35 26

Femal Merit List of Applicants For TAT-II (Applied for Qaria) District Mansehra

Sl No	Roll No	Name	Father Name	Post Applied for	Address	D.O.B	DATE OF DEC. OF RESULT	ETEA Marks	Academic															T/PA	Remarks				
									ETEA MARKS		SSC			FA/FSC			BA/BSC			MAM/SC									
									Total	Passage	Obt	Total	Passage	Obt	Total	Passage	Obt	Total	Passage	Obt	Total	Passage							
1	330	BIBI BUSHRA	FIDA HUSSAN	QARIA	MANGLOOR	02/2/1988	23/08/2007	184	300	24.533	548	850	9.871	887	1100	9.358	301	550	5.473							49.04			
2	756	SHAZIA	M AFZAL KHAN	QARIA	BANDA GESUCH	08/7/1977	2007	172	300	22.933	493	850	8.7	642	1100	8.755	288	550	4.873	679	1100	3.088						45.98	Has be selected as AT
3	85	AYSHA	M SADIQ	QARIA	OGHI MANSEHRA	18/3/1987	17/07/2008	138	300	18.133	541	850	8.547	641	1100	8.741	328	550	5.927	789	1100	3.632							
4	328	FATIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR	01/4/1984	09/08/2003	164	300	21.867	567	850	10.01	614	1100	8.373	311	550	5.655									45.90	
5	583	Farhat Bibi	M.Hamayun	QARIA	Dhodial	18/2/1981	14-03-200	136	300	18.13333	489	850	8.278	688	1100	9.355	312	550	5.873	770	1100	3.5							44.94
6	440	MANAZZA	MOHD HAMYUN	QARIA	TRANGRI BALA	20/4/1988	17/08/2008	152	300	20.287	517	850	9.124	728	1100	9.941	283	550	5.327										44.17
7	454	MADHIA BIBI	ALI KHAN	QARIA	AFZALABAD	04/1/1988	01/10/2002	172	300	22.933	854	850	11.54	711	1100	9.695	0	0	0	0	0	0	0	0	0	0	0	0	43.95
8	331	BIBI SAEEDA SALAMA	FIDA HUSAIN	QARIA	MANGLOOR	18/4/1979	1998	178	300	23.467	507	850	8.947	531	1100	7.241	236	550	4.281										43.37
9	688	ASMAT BIBI	ABDUL REHMAN	QARIA	LASSAN NAWAB	02/8/1981	17/05/2009	172	300	22.933	449	850	7.824	544	1100	7.418	280	550	5.091										43.00
10	329	BIBI MARIUM	FIDA HUSSAIN	QARIA	MANGLOOR	08/8/1988	09/08/2003	176	300	23.467	358	850	8.082	520	1100	7.091	240	550	4.364										42.51
11	731	SAMMIYA RAHIEM	RAHIM SHAH	QARIA	OGHI MANSEHRA	08/2/1988	01/12/2010	132	300	17.6	510	850	9.738	1100	10.08	468	800	5.85	0	0	0	0	0	0	0	0	0	0	40.40
12	327	SAIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR	01/4/1982	09/08/2003	140	300	18.667	559	850	8.885	557	1100	7.595	235	550	4.273										39.78
13	453	ALYIA BIBI	ALI KHAN	QARIA	AFZALABAD	27/8/1988	01/10/2002	164	300	21.867	378	850	8.671	536	1100	7.309	217	550	3.945										38.87
14	82	AYSHA Krawal	Khaili ur Rehman	QARIA	Labarkot	08/12/1991	2004	164	300	21.86687	579	900	9.85	539	1100	7.35	0	0	0										38.27
15	387	AMBER ZEB	ALAM ZEB	QARIA	PHULRA	31/03/1989	2008	148	300	19.733	701	1050	10.01	825	1100	8.523	0	0	0										36.27
16	639	AISHA BANO	SHAHZADA	QARIA	M.M.POLE MANSEHRA	11/03/1990	20/05/2002	120	300	16	731	975	11.25	632	1050	9.029	0	0	0										35.22
17	439	BUSHRA BIBI	LAL KHAN	QARIA	PHULRA	25/12/1991	2008	128	300	17.067	589	900	9.483	638	1100	8.873	0	0	0										35.18
18	812	MAMOONA WAJID	WAHJID	QARIA	BHERKUND	12/08/1992	02/05/2003	120	300	16	612	900	10.2	657	1100	8.959	0	0	0										33.03
19	200	HAMEEDA	MOHD YOUSAF	QARIA	PHULRA	20/06/1987	09/02/2009	124	300	16.533	788	1275	9.035	547	1100	7.458	0	0	0										30.28
20	469	TABSUM	MOHD NAZIR	QARIA	OGHI MANSEHRA	27/04/1989	2007	158	300	20.8	662	1050	9.457	0	0	0	0	0	0										27.89
21	138	SABA NOOR	SHEIKH NOOR ELLAHI	QARIA	MANSEHRA	18/02/1985	24/11/2000	132	300	17.6	668	1000	9.98	0	0	0	0	0	0										28.78
22	2002	ASMA NAZ	MANZOOR HUSSAIN	QARIA	BEHALI			136	300	18.13333	490	850	8.647	0	0	0	0	0	0										

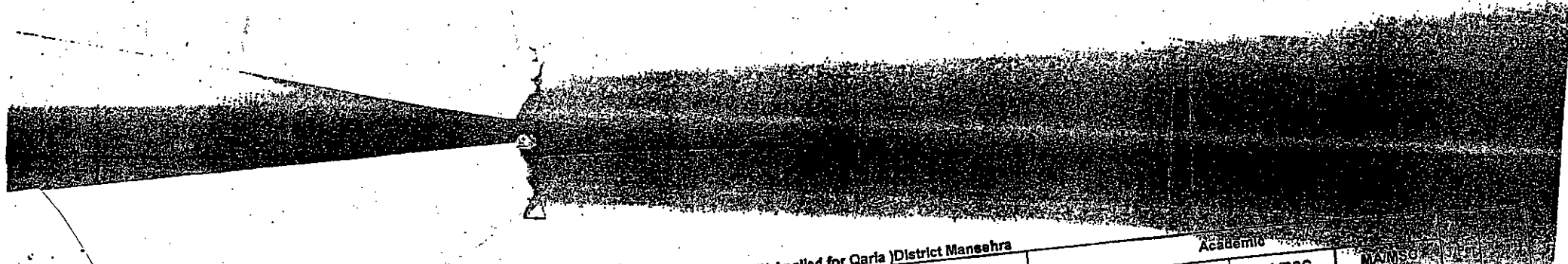
Mansehra District Office
Distt: District Mansehra

Mansehra District Office
Distt: District Mansehra

(27)

28

36



Merit List of Applicants for TAT-II (Applied for Qaria) District Mansehra

Sl	Roll No	Name	Father Name	Post Applied for	Address	D/O BIRTH	DATE OF DEC:OP RESULT	ETEA Marks	ETEA MARKS		SSC			FA/FSC			BA/BSC			MA/MS				
									Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page					
																				Obt	Tot	Page	Obt	Tot
23	81	TAHIRA NIAZ	ANIAZ MOHD	QARIA	ICHRIAN MANSEHRA	12/10/1985	09/11/2004	132	300	17.6	361	850	6.371	0	0	0	0	0	0	0	0	0	0	23.97
24	275	GHAZALA JAVED	MOHAMMAD JAVEED	QARIA	MANSEHRA	17/05/1984		124	300	18.53333	421	850	7.429											23.98
25	698	SAIQA TABASUM	SAID ALAM	QARIA	GABDIAN MANSEHRA	02/02/1977	28/03/1998	120	300	16	426	850	7.518	0	0	0	0	0	0	0	0	0	0	23.52

Attested

*Pa. S
A. D-O
(District CP)*

Jan
DO (Formal)
(E & S) Edu. Mansehra

*7/11/04
A.D-O
(District CP)*

Muhammad Arshad Khan Tanoli
Advocate
Distt. Courts Abbottabad

وکالت نامہ

بعدالت KPK سرویس گورنمنٹ لیمیٹڈ
 عنوان: عالیہ جی کی (فارم) بنام گورنمنٹ KPK ایجنسی وغ
 منجانب: اسد
 نوعیت مقدمہ: اصل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام
 جنہر اسد رضا منیری ایڈووکیٹ جو اے جی ڈی کے ایڈووکیٹ اور
 کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب
 موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
 وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
 کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار
 بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول
 ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔
 نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف
 پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف
 مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی
 پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Attested

M. Arshad Khan Tanahi

Adv High Court Ald

عالیہ جی کی

Alta B1B1

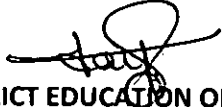
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No: 772/2015

Respectfully Shewth

1. That the services appeal No: 772/2015 in respect of MST: Alyia Bibi is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4224-29 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qaria (Notification attached).

It is requested that the above mentioned appeal may kindly be dispose off please.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

ADD

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Aalia Bibi, Qaria at Government Girls High School Sangar District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1575-85 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Her name was at S.No. 13 of the merit list. Her sanad of Hizful Quraan was from Wafaqul Madaris Multan, whereas the sanad of Tajveed ul Quraan was from Darul Uloom Jamea Muhammadia Arbia Tadreesul Quraan Wa Hadees Khwajgan Mansehra. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No. 12.

2. Appeal may be accepted subject to condition that the madaris/ institution from where she acquired asnad (Qirat & Hiz ul Quran) for the post of Qaria must be affiliated with Wafaq ul Madaris in line with the Govt. of KPK E&SE Deptt. Letter No. SO(PE)5-12/ Darululoom Swat/ Chitral/ 10 dated 7/6/2012.


NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1575-85 dated 03/03/2015 and reinstates Ms. Aalia Bibi, Qaria, at Government Girls High School Sangar District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4224-29 /F.No. 29 /Appeals Female MSR Dated Peshawar the 25/8/2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Aalia Bibi, Qaria and place on record under intimation to this office.
2. District Accounts Officer Mansehra
3. Principal, Concerned
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP
Peshawar