Appellant Deposited
Security & Process Fee

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 11.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

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.

Charleman _Camp_Court_A/Abad__

p-Cour A/Abac

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Dismissed as withdrawn.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.

<u>ANNOUNCED</u> 20 10 2015

Form- A FORM OF ORDER SHEET

Court of	
Case No	765/2015

	Case No	<u>765/2015</u>
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.07.2015	The appeal of Mst. Bibi Farah presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in
2	10-7-15	the Institution register and put up to the Worthy Chairman for proper order. REGISTRAR This case is entrusted to Touring Bench A.Abad for
		preliminary hearing to be put up thereon $\frac{24-7-17}{2}$
·		CHAIRMAN
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BEFORE THE KHYBER PUKHTUNKHAW SERVICE TRIBUNAL, PESHAWAR

Appeal No 765/2015

Bibi Farah D/O Khurshid Khan (PST GGPS Sawan Maira) R/O Tarapi 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	APPEAL ·		1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12
4	Copy of appointment order and corrigendum	"C"	14-16
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	17-19
6	Copy of impugned dismissal order of appellant	"E"	20
7	Copy of departmental appeal /representation	"F".	21-27
8	Copy of merit list	"G"	
9	Wakalatnama		

Dated: 7-/7-/2015

Appellant

Through

Muhamad Arshad Khan Tanoli

Advocate, High Court
Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE TRIBUNAL, PESHAWAR

Appeal No. 765/150

Bowle Province
Service Tribunal
Diary No. 797
Based 8/7/15

Bibi Farah D/O Khurshid Khan (PST GGPS Sawan Maira) R/O Tarapi 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

Respectfully Sheweth,



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

 That, respondent No 3 announced the posts of PST in Dailly "The Aaj" dated 20/5/2011 for appointment of PST teachers. The Appellant fulfills the entire criteria which is sine qua non for appointment for the post of PST Teacher.

Copy of Advertisement is annexed as Annexure "A"



- 2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, F.A/F Sc PTC with extra qualification. Copies of Documents/testimonial are annexed as Annexure "B"
- 3. That, following this, the appellant was appointed as PST Teacher in respondents' Department on the basis of merits and was posted in GGPS Singal Kot vide Jamila vide appointment order endrst No 5360-5384/ Estt; PST 2011/2012 Mansehra Dated 18 05 2012. Copy of appointment order and 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. 18.05.2012 onwards.
- 5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 2036-45/AE /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 and DEO, Shamim Akhtar was found attached with the show cause notice, wherein

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it was mentioned against the name of appellant that "that appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes as against the recruitment rules". Copy of Show cause notice annexed as Annexure "D". AS the inquiry committee did not 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 PST Teacher and appeared in ETTA 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 requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of PST Teacher is taken into consideration and thereafter appointment made on merit.
- 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 required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order



endst. No 1826-35/AE./Estb_dated 29.9.2015. 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 9.03.2015. 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:-

GROUNDS

That, the appellant fulfilled the criteria of appointment as PST being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed on 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.



That, as per educational record annexed with the appeal, the appellant has been appointed as PST according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that there were vacant post of PST in the Union Council of the appellant but respondent No 3 did not appoint the appellant in her Union Council. However later on she was to be posted in her own Union Council. It is worth mentioning that there was no contesting candidate in the Union Council where the appellant was appointed as per law and procedure mentioned in the advertisement.

b.

- 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 PST. 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 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.

- 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.
- PST in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- 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 removal of Umar Kundi from service, the appellant

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cannot be dismissed for the acts committed by the Ex-EDO.

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 2036-45/AE./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: >/ >/2015

Appellant

Through

Muhamha Arshad Khan Tanoli

Advocate, High Court
Abbottabad



BEFORE THE KHYBER PUKHTUNKHAW SERVICE TRIBUNAL, PESHAWAR.

Bibi Farah D/O Khurshid Khan (PST GGPS Sawan Maira) R/O Tarapi 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 APPEAL 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) Mansehra 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

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: 7-/-7/2015

نجی کی مرا Appellant

Through

Muham Arshad Khan Tand

Advocate, High Court
Abbottabad



BEFORE THE KHYBER PUKHTUNKHAW SERVICE TRIBUNAL, PESHAWAR.

Bibi Farah D/O Khurshid Khan (PST GGPS Sawan Maira) R/O Tarapi 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, Bibi Farah D/O Khurshid Khan (PST GGPS Sawan Maira) R/O Tarapi 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: 7/2015

Deponent

بدال تيران لرمول كريات أيستر (دارتد) كالعرف التاف بارام parti)رائدردشاد 132011 أيتركم القامع الإقامة القامع الإقام الإقامة المتعاددة المتعادد Chies ADP No. 102(2010-11) World Tiller Jaly Shing ليزك والمعاد المعدد والمانيان والليال عوماء الماس عددوال المك دُيْرِولَ رَبِي 2009 كَلْهُ إِدِيمِرِ بَعْرِيرُومِ اللهِ رئ ماينا عذ كنر يمرانري المُ المُن يَرِجُ المِنْ الْمُنْ الْمِنْ الْمُنْ الْمِنْ الْمُنْ الْمُنْ الْمِنْ الْمُنْ الْمِنْ الْمِ المرائع المرائع المائعة في المائعة المائعة المالم والمرادة كمن براتع ين لمين إيماش مادعاد وكسؤكش يرائح يمتأريز ايمه ليما يمل كنسركن كمينى عتيلنو يخلين النهائه لمنابط ويمان و ورود و المحالية و المحالي といいとしていいいとうれいがとしょくひときりきょうからくいか والمنساري والمراد الماي من المراد المناس المراد الم سلائد بالمارث تسدولا عياريد ليزمك توكامن [وطأنت بمر لإينادك ا ممکاسیل ماند ىل 2-5-2011 ئىل £89.106كن 1391060 ()ئېرىمىدىدىنىدىنانويتوما ئ درل4-6-2011 a-6-2 والمركب والعالم الميمون AUP No.192-2010-11 Pre Bid Meeting ن علی کے دائز علی مودو۔ 2011 تا کا بعث 11:00 ایسیکا آیا۔ میٹک شنز ہوگ میس عمل عمل کا والالال المراك المراقبة والمالي إن المالول كام على المرايات والمارك المراكم المال المالية علام المراد المر عريب إلاف كل الميت كما ل لمرادون مينك مركزت مظوب ب) نيزدندم كرمول ك فرم كويزي كالدولة كالدين تيزركو للحراس والدولة والمركزة 31-05-2011 كليدو والكورة كالوقات كالمرك الأبال حرارك يور فن كداوا ومدويدا في صعدة · July Lipro-blacentick fra Line Line W كيلهوا وكالمالمة في ال هويوامة مستقرامه إلى الكالم الوين الموادية الماريد (D) (COA) בון בילולי איבנים בינילולים עור בעלי אודאונוו (ניבוצינים לים) واستراستان مارك مان زواد المان كليدا للكامتره ولنسب عثاكيله فيالت فواغ فيصعد بالغريث كالجازيداء في نون يون المرادة 2 رين الزيم بالمرابع المرابع المراب 4) ام كاروف Sublatting كام مدين من المايا يا المايا الماء من الكاما الكاء quencher as Colora Chian accommendation 10x (Cay (5 ב Bolo Analysia كا منافئة و كال المالية المنافظة المالية الما T Rate Adalysis while we file of fill job is job with ביל בל ב Supportive ב ביל האול האול האיל ביל אילים ويكول كول مروجة فوق سيخت المل الدامي الميك من المراسات نيذور كبينة بمكيامات كمان بمواحث 10) مشيركا مدين كم يكونونون كرسيكا ودوام المراب كالمساب كالمراد المراد ا 11) كال منكوفرس كونندك و PEC Registration من كوتيد 11-12-2011 عن

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Disit: Courts Abbottabad

MEDICAL CERTIFICATE

Anner - B
Name of official Bibi Farah
Father's Name Khurshid Khan
Date of birth 07-12-1980
Caste of Race
Address Yillage & P.o Traffi
Tehsil Manschaa District Manschaa
Exact height by measurement <u>SF. 31</u>
Personal mark of identification
National Identity Card No. 13503-0517529-0
Signature of official
Signature of head of office
Seal of office
I do hereby certify that I have examined Mr. Ribi Farah
employment in the office of the E ducation Deft.
and can not discover that he had any disease comments in the
other constitutional affection or bodily infirmity
I do not consider the
I do not consider this as disqualification for employment in the office of the AS Above
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years and by appearance about
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Wedical Superintendent, DIIQ Hospital Mansehra
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28/05/1214 Maz Muhammad) Modical Superimendent King Abdullah Teaching Mosphal Manselma

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ANTOE OF THE EXECUTIVE MISTRIOF OFFICER BAS OFFICATION MANISTERA

ORDER

Consequent upon the recommendation of the Departmental Selection Committee District Manschra, the competent authority is pleased to appoint the following candidates as a Primary School Teacher PST (Fernale) against newly created / resultant vacated posts in their relevant union councils in EPS 7 @ Ps.5800-320-15400 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conductions given below with immediate effect.

		U/C BAFFA	/ SB46	
S# Name of C	andidate	Father's Name	Fiome Address/ Dominited IVC	Remarks
1 Hiaz Gul		Abdul Razaq	Baffa	Own UC M/List
2 Subia	_	. Moor Husanio	Doftio	Own UC M/List
		U/C BEHAL!	253557	GAM GAMADIA
3 Munaza Da	nd	Dand	Behali	Own UC M/List
4 Nazum Bib	i	R.Khan Bahdar	Behali	Own UC M/List
		U/C Battal	5-5362	te to the same triple to the
5 Shings Ga Gi	ibi	Mohammad Shafi Khan	0.00	A Charles A Lie Charles Land
6 Shaista Jabe		Muhammad Alabar	·	Prom Adjacent UC
			Kathai	Morit list
Bushra		U/C Bherkund	6-5363	
,		Ghulam Mustafa	Micking	Own UCRM/Lint
8 Haide Ashr	ea f	U/C Gari Habib Uii	¬	
9 Gul Nav 6		Muhammed Ashrif Bag S. Ombol Sheh	Carl Habib Ullah	Own UC M/List
L. 111 1 102 1.1			Cisci Habib Ullah	Own UC M/List
75 1 3 2 3		U/C Hillios	6 SB35	
10 Bibi Asia		Abdal Chafoor	Hillrot	Own UC M/List
		· U/C Hangeri	7 5755	•
Fi - Irun Saced		Saced Alchtar	Hangrai	Own UC M/List
2 Marium Bib	oi .	Mulammad Younis	Hangrai	Own UC M/List
		U/C Ichrian	8 5367	
3 Bibi Sajida		Saced or Rehman -	i lighrian	Own UC M/List
J Saima Ara		M.Farced Khan	tehrian	Own UC M/List
		U/C Jabar Daveli		3 417 0 3 148 15161
 iMah Jabeen 		Minhannad Faroog	Jabar Daveli	Own UC M/List
6 Saba Tariq		Muhammad Tariq	Sachan	From Adjacent UCs Merit list
- <u>- </u>		U/C Jaloo	10 - 5:569	
7 Sobia Bibi		Abdul Ghafoor	Jalon	Own UC Millist
8 Saima Naz		Mir Alzal	- Jaleo	Own UC M/List
22 1 112 22 1		U/C Karnel	11- 5320	
9 Faca Max		Muhammad Kharshid	Karnol	Own UC N/List
0 Nadia Rehi	man ·	Habib ur Rehman	Pairen	From Adjacent UCs
·	·	UIC Serori		Merit list
1 Amria Youn	ris	Muhammad Younis	Karori	Own UC-M/List
2 Musrat Bibi		Khalil ur Rehman	Karori	
3 Zaamb	· · · · · · · · · · · · · · · · · · ·	Alam Zeb	Karori	Own UC M/Mat Own UC M/Maist
4 Amria Rusa	ı'	Muhammad Miskeen	Karori	Own UC M//List
5 Rukhsana Ti		Taj Mulamanad	Karori	Own UC M/Lis
6 Rifat Bibi	Fire manufered determinance of the special case of	Fageer Muhammad	Shanaya	From Adjacent UCs Ment list
7 Ashiya		Misri Khan	Shanaya	From Adjacent UCs Mort list
8 Razia Bibi		Muhammad Zaman	Darband	From Adjacent UCs Merit list

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		U/C Lassan Nawa	b 14 - 3 2 2 4	
	abin Arshad	Mithammad Arshad	Lassan Mawab	Own UC M/UR
	Rashida Bibi	M.Zahoor	Lassan Mawab	Own UC M/List
	T	U/C Mohandari	19 572 75	.:
ġ.	Bibi Bascoma	Ghulam Nabi	Mohandari	Own UC-M/List
		U/C Nika Pani		
1:4	Ynsingen Waliab	Abdul Wahab	i Mika Pani	Own JC M/List
- :3	Neelam .	Abdul Latif	Darband	From Adjacent UCs Merit list
		U/C Perhinga	16-5375	
[5]	Lubna Younis	M. Younis	Perhinen	Own J.C. M./List
35	Zahida Bano	Ali Zaman .	Perhinna	Own UC MAJEC
		U/C Phoira	17 - 572-76	
.30	Bibi Saleha	Abdula Jan	Phuira .	Own UC M/Ust
37	Mehnaz Bibi	M.Igbal	Phulra,	Own UC M/List
38	Bibi Mewash	M.Naveed	Phulra	
39	Farzana Yousaf	M.Yousaf	Phulra	Own UC M/List
45	V		3-11(1) 3	Own UC M/List From Adjacent UCs
40	Bibl Farah	Khurshid Khan	Sawan Maira	Medit list
40	Sibi Salama	UIC Sachan Kelar		
47	Bibi Morin	Shezada Khesro Feredon	Sachan Kalan 🕠	Own UC W/List
-172	Lipior Morns	Rehmat Ullah	Sachan Kalan	Own U/C M/Usi
43	Tabira Jabsen	U/C Savian Maire	—, , ·	
-1	1 - dond rabben	Muhammad Aynb U/C Shanaya	Sawan Maira	Own UC M/List
10	Safoora Parat	Abadul Razag	Sinnaya	
45	Trum Shaheen	Anwer Klian	Shanaya	Own US M/List Own US M/List
		- U/C Shergarh	_& _ 0350	- CAN CO. WIELD
46	Saceda Haidar	Mir Haidar	Shergarh	Own UC M/List
47	Pozia Bibi	Sher Bahadar		
48	Sadia Gul	M.Zaman	Shergarh Shergarh	Own College Park
49 49	Asma	Abdul Malik	Darband	Own UC Malks From Anjacent UCs
				Merit list
50	Sadin Javed	U/C Shunkat Ahad		
<u>50</u> 51	Satora Javeo Gallegn	Javed Khan M.Hareon	Shuakat Abad	Own UC ivi/List
52	Tabasan Rashid	Abdul Rushid .	Shunlan Ahad	Over UC rel/Clar
	· ·	U/C Trangri Sabir St	Shuahat Abad	Own UC W(LS)
50	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Treogri Sabir Shah	Own UC, M.L. St
5-1	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	Cwp UC (M/Lkr
- 55	Sidra Hamayon	M. Hamayon	Trangri Sabir Shah	Own UC M/List
		U/C Sandi Sisungi		1 Own De Miller
56	Salme Javed	Muhammad Javed		From Adjacent UCs Merit list
57	Mosheen Bibi	Faxal ur Rehman	- Darband	From Adjacent UCs Merit list
		U/C Tanda	27-5359	1 67 (41) 7(3)
58	Sahibzada Hazmat Rabani	Ghulam Rabani	Tanda	From Adjacent UCs Merit list 1.1
59	Asma Noreen	Nawab Khan	Dhedial	From Adjacent UCs Monthlish

Consequent upon the above, the following adjustment are hereby ordered against asch. the posts mentioned against each.

S#	Name .	Futher's Name .	Domiciled U/C	Plane of Pasting	· · ·	Remarks	
i	Niaz Gul	Abdul Razaq	Balla	GGPS Baffa Khaza	<u>,</u> , ,	A/V/Post	12.50
2	Sabia	Noor Hussain	Batta	GGPS Kanda Gaii		· A/V/ifost	6/
3	Mitinaza Daud	Daud	Dehali	GGPS Ashwal		A/V/F-ist	200
4	Nazma Bibi	R.Khan Bahdar	Behali	GGPS Jamal Nakka		A/M/Post	43
E,	Shagatta Bibi	Muhammad Shali Khan	(Ballo!	GGPS Karmang		AZVZENIC	69 1
Ģ.	Shaista Jabeen	Muhammad Akbar	Kathai	GGPS Chandni		1 AZVII osi	

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		***************************************	S. Qabat Shah	Gari Elabib Ullah		
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19	18	Saima Naz		. 		
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45 Irum Shaheen	:					
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46 Saeca Pladar Mic Pladar Shergarh GGPS Gakhach AVVII 4 2 4 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	i			;	· 	
48 Sadia Gul M.Zaman Shergarh GGPS Perebaian AAMP at 49 Aarna Abdul Malik Darband GGPS Sherolian AAMP at 50 Sadia Javed Javed Khan Shuakat Abad GGPS Lalan Da Darra AAMP at 51 Sabeen M.Haroon Shuakat Abad GGPS Claipe Bala AAMP at 52 Tebasam Rashid Abdul Rashid Shuakat Abad GGPS Paniyati AAMP at 53 Nabeela Ghuncha Gul Bashir Ahmad Khan Trangri Sabir Shah GGPS Trangri Bala AAMP. 54 Khalida Bibi M.Yousat Eban Trangri Sabir Shah GGPS Trangri Bala AAMP. 55 Sidra Hamayun M.Hamayun Trangri Sabir Shah GGPS Trangri Bala AAMP. 56 Salma Javed Muhammad Javed Darband GGPS Recr Bat AMP at 54 Nashin Bibi Fazat ur Kebman Darband GGPS Recr Bat AMP at 55 Sahibzadi Azmat Rebani Ginulom Rabani Tanda Gucha GGPS Tatiso Manda AMP at 55 Sahibzadi Azmat Ginulom Rabani Tanda Gucha GGPS Tatiso Manda Gucha GAMP at 55 Sahibzadi Azmat Ginulom Rabani Tanda Gucha GGPS Ketiri AMP at 55 Sahibzadi Azmat Ginulom Rabani Tanda Gucha Gucha GAMP at 55 Sahibzadi Azmat Ginulom Rabani Goldan Gucha GAMP at 55 Sahibzadi Azmat Ginulom Rabani Gucha Gucha Gamba Gucha GAMP at 55 Sahibzadi Azmat Ginulom Rabani Gucha Gucha Gucha GAMP at 55 Sahibzadi Azmat Ginulom Rabani Gucha Gucha Gucha Gamba Gucha Gamba Gucha GAMP at 55 Sahibzadi Azmat Ginulom Rabani Gucha Gucha Gucha Gamba				1	·	,//V/
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51 Sabecn M.Baroon Sheakat Abad CGPS Chajer Bala AZVIP 52 Tebasam Rashid Abdel Rashid Sheatat Abad GGPS Paniyati ZVVIP 53 Nabeela Ghuncha Gul Bashir Ahmad Khan Trangri Sabir Shah GGPS Trangri Bala AZVIP 54 Khalida Bitri M.Yousaf Khan Trangri Sabir Shah GGPS Trangri Bala XVVIP 55 Sidra Hamayun M.Hamayun Trangri Sabir Shah GCPS Khai Paloi AZVIP 56 Salma Javed Muhammad Javed Darband GGPS Rayera QZVIP 57 Noshin Bibi Fazat ur Kohmon Darband GGPS Reer Bat ZZVIP 58 Sahibzadi Azmat Rebani Giulom Rabani Tanda Gucha ZZVIP 59 Asma Norden Mayab Khan Ohodial GCPS Ketiri AVIP			· · · · · · · · · · · · · · · · · · ·	l-:		
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59 Asma Norden Nawah Khan Ohodial SCR'S Kotini AMP	!	44 - 4- 6- 1				
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	50	Asma Norden	Nowab Khan	Ohodial -	GCPS Kothri	CANA 1

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage to theur

Distl: Courts Abbottabad

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will be governed by such rules and regulations enforce and as may be prescribed by ecomment from time to time for the category of the Government servants to which they belong.

in case they folled to assume the charge of their posts within 15 days of their appointment; candidatureship will be stand automatically cancelled.

Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Pund however they will contribute GP fund on the prescribed rate & balfcontribution will be made by the Government.

- They will submit to this office, their all testimonial and domicite/ UC Certificate from the secretary. concerned union councils 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.
- The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Manschra)
- 7. In case a document or documents is I are found take or forged or Bogus on such scruting 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
- 3. 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.
- Their services can be terminated at any time in ease 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 Mansehra.
- 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
- 13. No. TA/DA etc is allowed.
- 28. Charge report should be submitted to all concerned in duplicate.

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

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Indst, No. <u>5360-5384</u> /Estt. (F)Apptt:PET(F)/2011-12 Dated Mansehra the 18th May, 2012 ī

- Secretary to Govt: of KPK E&SE Department Peshawar. 2.
- Director E&SE Department KPK Peshawar. District Accounts Officer, Mansehra. 3
- District Officer (M&F) Local Office.
- Deputy District Officer (Female) E&SE Monschra. 6
- PA to District Coordination Officer, Manschra. 7
- Budget & Accounts Officer, local effice, Manschra.

9-67 Candidates concerned.

> EXECUTIVE DISTRICT OFFICER E&S EDU: MANSSHRA

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TAT-1 FEMALE MANSEHRA RESULT 2011

Roll No	Name	Father Name	Marks	%age
	BIBI SALIHA	ABDULLAH JAN	152	50.67
	ASMAT BIBI	DILBER SHAH	48	Fail
	ÁMINA BIBI	TAJ MOHD	48	Fail
	SHIFQA BIB!	SKINDAR SHAH	136	45.33
		MOHD QASIM	108'	43.33 Fail
	JAMILA KHATOON	MOHD CASIM MOHD JAVED	80 -	Fail
	MASEEM NAWAB	NAWAB KHAN	0 .	Fail
		ABDUL LATEEF	104	Fail
	HALEEMA SADIA SAIRA	ABDUL LATEEF	92	Fail
	RIZWANA NOSHEEN	TAUS KHAN	96	Fail
	NAZIA BIBI	SHER BAHADUR KHAN	76	Fail
	<u> </u>			
	NAZIA BIBI	SHER BAHADUR KHAN	Absent	#VALUE!
	FĮŽUA RASHID	ABDUL RASHID	76	Fail
	MASEERA KANI	SULTAN MOHD	44	Fail
1700130	UMARA ZEB	AURANGZEB	88	Fail
1700131	SABA RAIZ	M RAIDES	68	Fail
1700132	RABIA SHAFIQ	M SHAFIQUE	60	Fail
1700133	AMINA: BUBI	NADAR KHAN	64	Fail
	SOBIA AMIN:	AMIN UR REHMAN	52	Fail
	BIBI NAHEEMA	ABDUL QAYUM	88	Fail
1700136		DURI AMAN .	88	Fail
1700137		MOHD JAVED	84	Fail
	UZMA RANI	GHULAM SARWAR	64	Fail
	SAFINA BIBI	ABDUL KARIM	96	Fail
	NAHEED ANWER	M ANWER	1√ 68	Fail
	SADAF FAISAL	M SADIQ /8/	%\\ 88	Fail
	SOBIA BIBI	M RASHID	76	Fail
	NABILAT.	KHAWAJ MOHD	7 o ; 48	Fail
	DILSHAD BIBI	AZIZ UR REHMAN	5/ 96	Fail
	ANILA NOREEN	JEHAN ZEB	96	Fail
	ZAHIDA BIBI	GUHLAM HUSSAIN	72	Fail
	WAJEEHA	MUSASSAR SHAH	0	Fail
	IGHAZAL AKBER	ALI AKBER	120	40.00
	FAIZA RANI	GHULAM NABI	·	
	BIBI FARAH		48	Fail
		KHURSHEED KHAN	156	52.00
	LUBNA"	MOHD TOFIAL	100	Fail
	BIBI NASEEMA	GULAM NABI .	124	41.33
	CHAMAN BIBI	MOHD SALEEM	80	Fail
	CHAN BIBI	M UMAR	76	Fail
	ABIDA PARVIN	TOFIAL AHMED	68	Fail
	MARIA .	ABDUL QUDOUS	80	Fail
	SADIA BIBI	TAFUL AHMED	-48	- Fail
	IRUM AYUB	M AYUB	40	Fail
·	NOSHEEN GUL	MOHD BASHIR	88	Fail
	NOSHEEN KANWAL	SAKINDAR HAYAT	144	48.00
	FARAH NAZ	M BASHIR	44	Fail
	BIBI NABILA	ADBUL RAHIM	220	73.33
	GUL NAR	DAUD KHAN	0	Fail
	NAZMA NISAR	NISAR MUHAMMAD	124	41.33
1/20165	FARMINA NAZ	MOHD AZEEM	108	Fail
	SADIA HALEEMA	SARWAR SULTAN	136	45.33
1700166				
1700166 1700167	NELO FAR	MOHD AZEEM	152	50.67
1700166 1700167 1700168	NELO FAR HAJRA BIBI	MOHD AZEEM ABDULLAH KHAN	152 . Absent	
1700166 1700167 1700168	NELO FAR			#VALUE
1700166 3700167 1700168 1700169	NELO FAR HAIRA BIBI HALEEMA BIBI	ABDULLAH KHAN JEHANGIR	. Absent 92	#VALUE! Fail
1700166 3700167 1700168 1700169 1700170	NELO FAR HAJRA BIBI	ABDULLAH KHAN JEHANGIR	. Absent	#VALUE!

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Page 3 of 51

Email: deafmanschra@yahoo.com
Phone & fax: 0997-302518

THE DESTRICT EDUCATION OF THE (FEMALE) MANSEURA

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SHOW CAUSE NOTICE

Ambaria, arche de Elayber Pakhanddaya Servant (Efficiency & Discipline) Rules, 2011.

dis hereby serve you Mist.Pibl. Farab. PST GGPS Gujar Gali Manschra Show cause to the regulations.

- 1) You were diegally appointed as PST at GGPS Cujar Guli vide defunct Executive Disaries Officer (E&SE) Manselm at S. No. 38, aut of your-own U/C, where you want strainger for recruitment process initiated through EATA. Acceptance of you appear & subsequently your appointment order was the result of misuse of range at the then EDO according to his sweet well& wishes against the reguliform rules, as per inquiry report received through Government of Khyber transpositional, Elementary & Secondary Education Department: letter No (88) NGE/EGI/CO-17/2013 Junar Khan EDO 188-19 dated 25/08/2014 More was the them EDG(L&SE) hier been removed from Government Service in calastitus with this stayl, hoggs appointment including yours made by him.
- as a long through the finding and recommendation of the inquiry committee, the input as a record we office commented papers in chidingly our defining before the lengthy commutees.

I am satisfied that you have committed the following neis/omissions true find markets.

- the altripolation and distributed in parting bound taked appointment without due to the transferment.
- by analogical large formelial lesson to the Gover Treasury receiving pay as result of Sugar appointment.
- e) By sentering isolatished rights of the deserving candidates due for appointment on merly. Cheating/canceling the facts for unlawful appointment with collusion of their HDGs.
- 37 As a result thereof. I as compotent authority have tentatively decided to impose forces you the nation penalty of dismissal from services under rule 4 of the said

4) You, are itereby, 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.

(2) If no raply to this notice is received within so on days or not more than fifteen have of its delivery at suff to presument that you have no defining to put in and in that case an exeparty action shall be taken against you.

in. A copy of the finding inquiry countries related page is envlosed.

Parceleal

Resonantigorn

COMPETENTAUTHORITY

Mar Hilla Faralt

Munawand Arshad Khan Taneli Dictor Course Abbortabad

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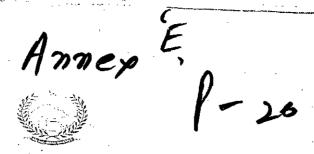
A SHARE		D	18
	(185) Farah 1/6 (UC Sawon Mera	Appointed at GUPS Gugar gell UC Pholis boing the selectation UC which is not correct Phulis is not adjacent UC to Sawan Mera. (Assembly UCCI).	Appointment is irregular
	Saeeda Haider r/o Sher Gorti	Appointed at GGPS Ghalder U.S. Sher Garh S.Ro 46. She had not entered her BA marks in her application form Tiere on tists. 2011 result was declared and award of weightage of BA after the closing date is not valid. (Autrest-LXXXXXXX)	rules/policy
	Fozia Bibi i/o UC Sher Garh	Although she vias shown absent in EATA result under P.No 2045 but vias included at S.No 47 of the appointment order appointed at GGPS Parchalan. (Author: 1200001)	Appointment is not valid
	Asma Abdul Malik r/o UC Darband	Appointed at GGPS Shoralian TUC Sher Garh being the adjacent UC. But the UC Darband is not adjacent to UC Sher Garh, were candidates of UC Sher Garh, were also waiting for appointment. The appointment of candidate of UC Purband in UC Liber Carlo is not valid. (America-EXCORV).	Appointment is irregular and violation of rules.
Pilipi Propinst Abady	Sabeen r/o UC Shoukat Abad	Appointed at GGPS Chajer Dala UC Shirmdara whereas three posts were already vacant in UC Shoukat Abad	The appointment is against recruitment rules.
MC - farangri - Sabar - Shati	r/o UCTfarangri Sabar Shah	Appointed at GGPS Khati Paloi at S.No 55 UC Sum Elahi Mang and not in own UC where three posts were vacant.	in other UC is
190 - Bandi Shungli	Mosheen Bibli r/s UC Darband	Appointed in UC Bandi Shungli at GSPS Beerbat being adjacent UC which is not the adjacent UC. (Adnex-LXXXXX)	The appointment is not valid as the near by UCs of UC Bandi Shungii are Khatai, Kareri and Sher Garh.
	Salma javed r/o UC Darband	Appointed at GGPS Phagura. She was not qualified as EA up to the dosing date of sevents enough Her BA result was declared on 15.8.2011. Award of BA weightage is not justified (Americal Communication) (Americal Communication)	The appointment is invalid.

Muhimad Ishad kilan Tanoli Advisi ate
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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

1:-	Where as Mst: Bibi Farah D/O Churchiel Chemorking.
	as pro GGHS/GGMS/GGPGLIAY Call was served with show cause notice and was account
	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.
- 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.
- 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 Pakhtunkhawa Govt:
	Servants(Ffficiency and Discipling) Position D. C. Douts of Milyber Palentunktiawa Govt;
	Servants(Efficiency and Discipline) Revised Rules 2011 the District Education Officer(Female)
	Mansenta, in the capacity of competent Authority is pleased to impose
	"DISMISSAL" from Govt: Services upon Mst. Bibi Farah D/O Churchin CT/PET/TT 199 GGHS/GGM GGPS Gujar Gode
	CT/PET/TI Des GGHS/GGM GGGS
	12 July Gode
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DISTRICT EDUCATION OFFICER FEMALE MANSAEHRA.

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Endst: No. 36-43 /AE/Estab: dated	/
AL- /Estab: dated	Dellas mar
Copy to the:-	<i>^</i> / ⁻
1 Secretary Florenches and C. C. C.	(?

- 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
- 7. SDEO(F) Mansehra.
- 8. Budget and Accounts Officer Local Office.
- 9. Mst:_
- 10.Office File.

DISTRICT EDUCATION OFFICER . FEMALE MANSAEHRA.

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19 John 1 - 18 June 1 - 18 June 1 - 15 - Local Lange F Annan Fr الرائع عالى طازمت الحال عالى! 12 Justin ا- نيم الله كاون تري فقيل و صلح قاليم ي را الله كاون تري فقيل و صلح قاليم ي را الله كاون تري پوسٹ ایر آمیناتی سولی تقی (آرڈرلف عے) مين سراط لسف مي دوارد مترير يي یہ نے عاری یونے ک کون میل میں PST ی مرف ایک لوسك خالی تقی اصلم اون میرا به ملحقه یوشی کوت ل میداره مین کنی Crosols Champy & PST ٥- ياليس ك وطالق اگرائ يوسن كوسل مين يوسف خالان مج تو ملحق ہوتی و کی میں اس اور کی الحالات ، اس لیے تجے بعی ملحقہ لوئی دوسر کے بارہ میں الیا یا اور ہولہ ہالی د س و طالق ت مرف کاف کا DEO(F) کا 29-09-2014 کاری کا طرف کے . 6 یے آئے معدی ۔ Show - Cause کو ایس فریر کو ایس کے ایک کے ایک کا کہ آپ ی کا کہ تاہے کی تاہے کہ تاہے کہ تاہے کی تاہے کی تاہے کے تاہے کی تاہے کہ تاہے کی تاہے کی تاہے کہ تاہے کی تاہے کہ تاہے کہ تاہے کی تاہے کہ
Show cause on is on مری تعیناتی خرقالوتی برس بلام قانون و طالق ایولی م (2 cd 36) P-22 20, yl DEO(F) 303-03-2015 Porte. 8 مرى يرفرق كا أردر جارى ليا. (کالی لف ہے) وناب عالى! سری آفری قانون کے وطالق کو فی جے اور (DEO (F) عالیوے تھے مخسر قالونی طور ہر ملازمت شے ہر خاست کوا ہے . استماع کے مرکالیک کو منظور فرط تے ہو کے کے PST يوسك ير عال رف احكمات ما در فرطي عرن تواز ش موی . Mental profession that - toust الورمناف كريز براغرى كرك أي فكي 11-2015

وكالت نامير verlie KPK - verson & PR عوان: كالى فرح الحراك بنام كور فوت مروم الوكن دو/ نوعيت مقدمه: مقدمه مندرجه میں اپن طرف ہے واسطے ہیروی وجواب دہی کل کاروا کی متعلقہ آں مقام مرارس مان تحل المرس مان كورك الله کووکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کومقد مہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ وتقر ر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اوربصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیه وعرضی دعویٰ کی تصدیق اوراس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مخارصاحب قانونی کوایے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگااورصاحب مقررشدہ کوبھی وہی اور ویسے ہی اختیارات ہوں گےاوراس کا ساختہ پر داختہ مجھ کومنظور وقبول ہوگا۔ دوران مقدمہ جوخرچ و ہرجاندالتوائے مقدمہ کے سبب ہوگا اس کے متحق وکیل صاحب ہوں گے ۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہویا حدے باہر ہوتو وکیل صاحب موصوف یا بند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کر دہ میں کوئی جز و بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراداستجارت نالش بصیغہ مفلسی کے دائر کرنے اوراس کی بيروي كابهي صاحب موصوف كواختيار ہوگا۔ لہذاوکالت نامة تحرير كرديا تا كەسندر ہے۔ بمقام: BIBI Faras

وقاص نو نوسٹیٹ کچبری (ابیٹ آباد) میں

Adv. High Court

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.765/2015

Respectfully Shewth

- 1. That the services appeal No: 765/2015 in respect of MST: Bibi Farah Khursheed is pending before this honorable court for reinstatement.
- 2. That reference director E & SE department notification Endst: No 4113-18/F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been freinstated against the post of PST (Notification attached).

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

DISTRICT EDUCATION OFFICER

(FEMALE) MANSEHRA

محملوه ـ

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst Bibi Farah, PST at Government Girls Primary School Gujar Gali District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2036-45 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. She belongs to U/C Sawan Mera where 01 post was lying vacant. Her name was at S. No. 02 of the merit list of her U/C. she was appointed in adjacent U/C Phulra but wrongly adjusted at GGPS Gujar Gali U/C Chatter Plain vide Endst No. 5360-5384 dated 18/05/2012 at S. No. 40. She was required to be considered for appointment in adjacent U/C where a post was lying vacant.

Appeal may be accepted as she is required to be adjusted in adjacent U/C/s. However if she is comfortable with her posting at present school, she may be allowed to continue as usual.

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. 2036-45 dated 03/03/2015 and reinstate Ms. Bibi Farah at Government Girls Primary School Gujar Gali District Mansehra with effect from the date of her dismissal with all back benefits.

Endst: No. _____/F.No._74 /Appeals Female MSR Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Dated Peshawar the ______/2015

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

1. District Education Officer (Female) Mansehra

2. Sub Divisional Education Officer (Female) Mansehra

3. District Accounts Officer Mansehra

4. Appellants concerned

5. PA to Director E&SE KP, Peshawar

6. Master File.

Deputy Director (Female)
Directorate E&SE, KP