

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 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.


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Dismissed as withdrawn.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



Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 765/2015

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. Bibi Farah 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 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: *7-6-2015*

765/15
Appellant

Through

Muhammad Arshad Khan Tanoli
Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 765/15 ①

K.W.P. Province
Service Tribunal
Diary No. 797
Dated 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:-

1. 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"

Registrar
8/7/15

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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

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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:-

GROUND

- a. 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.

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- b. 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.
- 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 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,

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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 PST 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 removal of Umar Kundi from service, the appellant

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

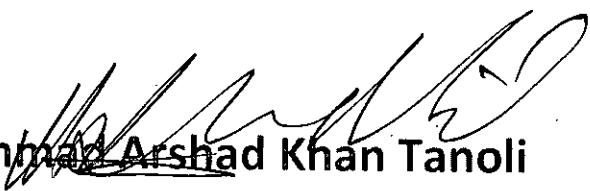
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 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: 27/3/2015

27/3/15
Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

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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 ³⁻³~~2-15~~ 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) 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

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

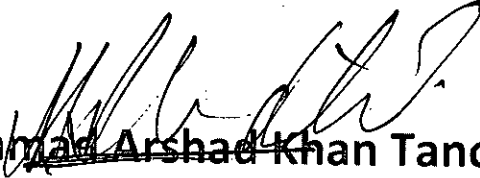
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

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

Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

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**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: 7/7 /2015

Deponent

ردیف	نمبر	تاریخ	موضوع
1	1	2	1
2	3	4	3
3	5	6	5
4	7	3	7
5	9	10	9

Pre Bid Meeting
 تاریخ: 31-5-2011
 وقت: 11:00 بجے
 مقام: ...

- 1) ...
- 2) ...
- 3) ...
- 4) ...
- 5) ...
- 6) ...
- 7) ...
- 8) ...
- 9) ...
- 10) ...
- 11) ...

0937-870861 فون
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ردیف	نمبر	تاریخ	موضوع
1	1	2	1
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3	5	6	5
4	7	3	7
5	9	10	9

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Ames
 "A"
 P-11

MEDICAL CERTIFICATE

P-12

Amner - B

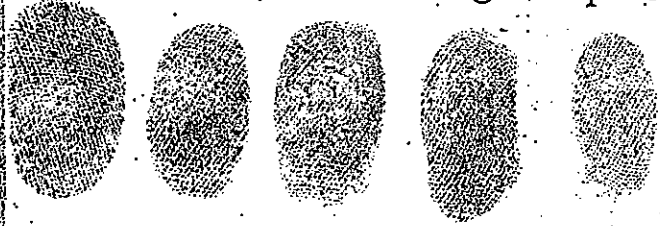
Name of official Bibi Farah
Father's Name Khurshid Khan
Date of birth 07-12-1980
Caste of Race Tanoli
Address village & P.O. Trappi
Tehsil Manshehra District Manshehra
Exact height by measurement SF 3'
Personal mark of identification _____
National Identity Card No. 13803-0517529-0
Signature of official [Signature]
Signature of head of office _____

Seal of office

I do hereby certify that I have examined Mr. Bibi Farah
employment in the office of the E Education Dept.
and can not discover that he had any disease communicable of
other constitutional affection or bodily infirmity
expect Nil

I do not consider this as disqualification for
employment in the office of the AS Above
His age according to his own statement is 32
years and by appearance about (32) years.

Left hand thumb and finger impression



[Signature]

[Signature]
Medical Superintendent,
DHO Hospital Manshehra
28/05/12
Dr. Niaz (Muhammad)
Medical Superintendent
King Abdullah Teaching
Hospital Manshehra.

Annex 9 C

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

Consequent upon the recommendation of the Departmental Selection Committee District Mansehra, the competent authority is pleased to appoint the following candidates as a Primary School Teacher PST (Female) against newly created / resultant vacated posts in their relevant union councils in EPS 7 @ Rs.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 conditions given below with immediate effect.

U/C BAFFA / 5360

S#	Name of Candidate	Father's Name	Home Address/ Domiciled U/C	Remarks
1	Niaz Gul	Abdul Razag	Baffa	Own UC M/List
2	Sobia	Noor Hussain	Baffa	Own UC M/List
U/C BEHALI / 2 - 5361				
3	Munaza Dand	Dand	Behali	Own UC M/List
4	Nazma Bibi	R.Khan Bahdar	Behali	Own UC M/List
U/C Battal / 3 - 5362				
5	Shayyida Bibi	Muhammad Shafi Khan	Batal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathal	From Adjacent UCs Merit list
U/C Bherkund / 4 - 5363				
7	Bushra	Ghulam Mustafa	Bherkund	Own UC M/List
U/C Gari Habib Ullah / 5 - 5364				
8	Haidi Ashraf	Muhammad Ashraf Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qahal Shah	Gari Habib Ullah	Own UC M/List
U/C Hilkot / 6 - 5365				
10	Bibi Asia	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai / 7 - 5366				
11	Irum Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Mariam Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian / 8 - 5367				
13	Bibi Sajida	Saeed ur Rehman	Ichrian	Own UC M/List
14	Saima Aun	M.Fareed Khan	Ichrian	Own UC M/List
U/C Jabar Daveli / 9 - 5368				
15	Mah Jabeen	Muhammad Farooq	Jabar Daveli	Own UC M/List
16	Saba Tariq	Muhammad Tariq	Sachan	From Adjacent UCs Merit list
U/C Jaloo / 10 - 5369				
17	Sobia Bibi	Abdul Ghafoor	Jaloo	Own UC M/List
18	Saima Naz	Mir Afzal	Jaloo	Own UC M/List
U/C Karnel / 11 - 5370				
19	Fara Naz	Muhammad Khurshid	Karnel	Own UC M/List
20	Nadia Rehman	Habib ur Rehman	Pairan	From Adjacent UCs Merit list
U/C Karori / 12 - 5371				
21	Amri Younis	Muhammad Younis	Karori	Own UC M/List
22	Musnat Bibi	Khalil ur Rehman	Karori	Own UC M/List
23	Zeenat	Akam Zeh	Karori	Own UC M/List
24	Amri Kusar	Muhammad Miskeen	Karori	Own UC M/List
25	Kukhsana Taj	Taj Muhammad	Karori	Own UC M/List
26	Rifat Bibi	Faqeer Muhammad	Shanaya	From Adjacent UCs Merit list
27	Ashiya	Misri Khan	Shanaya	From Adjacent UCs Merit list
28	Razia Bibi	Muhammad Zaman	Darband	From Adjacent UCs Merit list

Attended

Muhammad [Signature]
Distt: District Mansehra

200/- روپے

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(18)

U/C Lissan Nawab 15-5372			
	Muhammad Arshad	Lissan Nawab	Own UC M/List
	Rashida Bibi	M. Zahoor	Lissan Nawab
	U/C Mohandari 16-5373		
	Bibi Nasrma	Ghulam Nabi	Mohandari
	U/C Nika Pani 15-5374		
	Yasmeen Wahab	Abdul Wahab	Nika Pani
33	Neelam	Abdul Latif	Darband
	U/C Perhina 16-5375		
34	Lubna Younis	M. Younis	Perhina
35	Zahida Bano	Ali Zaman	Perhina
	U/C Phulra 17-5376		
36	Bibi Salcha	Abdula Jan	Phulra
37	Mehnaz Bibi	M. Iqbal	Phulra
38	Bibi Mewash	M. Naveed	Phulra
39	Farzana Yousaf	M. Yousaf	Phulra
40	Bibi Farah	Khurshid Khan	Sawan Maira
	U/C Sachan Kalan 18-5377		
41	Bibi Salama	Shehzada Khesro Fareed	Sachan Kalan
42	Bibi Norin	Rehmat Ullah	Sachan Kalan
	U/C Sawan Maira 19-5378		
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira
	U/C Shanaya 16-5379		
44	Safora Farat	Abdul Razaq	Shanaya
45	Irum Shaheen	Anwar Khan	Shanaya
	U/C Shergarh 20-5380		
46	Sacoda Haidar	Mir Haidar	Shergarh
47	Pozia Bibi	Sher Daladar	Shergarh
48	Sadia Gul	M. Zaman	Shergarh
49	Asma	Abdul Malik	Darband
	U/C Shukat Abad 22-5381		
50	Sadia Javed	Javed Khan	Shukat Abad
51	Gulshan	M. Haroon	Shukat Abad
52	Tabassam Rashid	Abdul Rashid	Shukat Abad
	U/C Trangri Sabir Shah 23-5382		
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah
54	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah
55	Sidra Hamayun	M. Hamayun	Trangri Sabir Shah
	U/C Sandi Siungli 24-5383		
56	Salma Javed	Muhammad Javed	Darband
57	Nosheen Bibi	Fazal ur Rehman	Darband
	U/C Tanda 25-5384		
58	Sahibzade Hazmat Rabani	Ghulam Rabani	Tanda
59	Asma Noreen	Nawab Khan	Dhodial

ADJUSTMENT ORDER

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

S#	Name	Father's Name	Home Address/ Domiciled U/C	Place of Posting	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	GGPS Baffa Khurd	AVP Post 60
2	Sabia	Noor Hussain	Baffa	GGPS Kando Gali	AVP Post 61
3	Mirnaz Daud	Daud	Behali	GGPS Ashwal	AVP Post 62
4	Nazma Bibi	R. Khan Bahdar	Behali	GGPS Jamal Nakka	AVP Post 63
5	Shagufa Bibi	Muhammad Shafi Khan	Baffa	GGPS Karamang	AVP Post 64
6	Shahista Jabeen	Muhammad Akbar	Kathai	GGPS Chandni	AVP Post 65

Attested

(Signature)
M. A. Usad Arshad Khan Tanoli
Officer
District Office, Sahiwal

سید محمد اسد خان

2001- روپے

1	Ghulam Mustafa	Bhekund	GGPS Rehman Mian	A/V/Post	67
2	Muhammad Ashraf Bag	Gari Habib Ullah	GGPS Paoosa Ganaila	A/V/Post	67
3	S. Qasbi Shah	Gari Habib Ullah	GGPS Chumri	A/V/Post	68
4	Abdul Ghafoor	Hilkot	GGPS Khan Bahawang	A/V/Post	69
5	Saeed Akhtar	Hangrai	GGPS Kalas Gharailla	A/V/Post	70
6	Muhammad Younis	Hangrai	GGPS Kalas Gharailla	A/V/Post	71
7	Saeed ur Rehman	Ichrian	GGPS Karang Bayeen	A/V/Post	72
8	M. Feroze Khan	Ichrian	GGPS Ramsara	A/V/Post	73
9	Muhammad Feroze	Jabar Daveli	GGPS Base Mandi Gucha	A/V/Post	74
10	Muhammad Tariq	Sachan	GGPS Base Mandi Gucha	A/V/Post	75
11	Abdul Ghafoor	Jaloo	GGPS Talica Di Kasi	A/V/Post	76
12	Mir Afzal	Jaloo	GGPS Choz Banda	A/V/Post	77
13	Muhammad Khurshid	Kamoi	GGPS Ghora	A/V/Post	78
14	Habib ur Rehman	Pairan	GGPS Ghori Sahi	A/V/Post	79
15	Muhammad Younis	Karori	GGPS Seri Malwal	A/V/Post	80
16	Khalil ur Rehman	Karori	GGPS Mallar	A/V/Post	81
17	Alan Zeb	Karori	GGPS Mallar	A/V/Post	82
18	Muhammad Miskeen	Karori	GGPS Fata Sandi	A/V/Post	83
19	Taj Muhammad	Karori	GGPS Fata Sandi	A/V/Post	84
20	Faqeer Muhammad	Shanaya	GGPS Maryala	A/V/Post	85
21	Misri Khan	Shanaya	GGPS Thakra	A/V/Post	86
22	Muhammad Zaman	Darband	GGPS Dha	A/V/Post	87
23	Muhammad Arshad	Lassan Nawab	GGPS Sheroia	A/V/Post	88
24	M. Zahoor	Lassan Nawab	GGPS Chapra Bala	A/V/Post	89
25	Ghulam Nabi	Mohandari	GGPS Bacha Gran	A/V/Post	90
26	Abdul Wahab	Nika Pani	GGPS Chawa	A/V/Post	91
27	Abdul Latif	Darband	GGPS Chawa	A/V/Post	92
28	M. Younis	Perhiana	GGPS Phalant	A/V/Post	93
29	Ali Zaman	Perhiana	GGPS Phalant	A/V/Post	94
30	Abdula Jan	Phulra	GGPS Ghazikot	A/V/Post	95
31	M. Iqbal	Phulra	GGPS Dhaman	A/V/Post	96
32	M. Naveed	Phulra	GGPS Ghazikot	A/V/Post	97
33	M. Yousaf	Phulra	GGPS Bataji	A/V/Post	98
34	Khurshid Khan	Sawan Malra	GGPS Gopri Gali	A/V/Post	99
35	Shezada Khuro Faredon	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/Post	100
36	Relawat Ullah	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/Post	101
37	Muhammad Ayub	Sawan Malra	GGPS Moha	A/V/Post	102
38	Abdul Razaq	Shanaya	GGPS Nunsheera Shahkot	A/V/Post	103
39	Anwar Khan	Shanaya	GGPS Nunsheera Shahkot	A/V/Post	104
40	Mir Haidar	Shergarh	GGPS Gakhach	A/V/Post	105
41	Sher Bahadar	Shergarh	GGPS Perchian	A/V/Post	106
42	M. Zaman	Shergarh	GGPS Perchian	A/V/Post	107
43	Abdul Malik	Darband	GGPS Shorlian	A/V/Post	108
44	Javed Khan	Shuakat Abad	GGPS Lalan Da Datra	A/V/Post	109
45	M. Haroon	Shuakat Abad	GGPS Chajer Bala	A/V/Post	110
46	Abdul Rashid	Shuakat Abad	GGPS Paniyali	A/V/Post	111
47	Bashir Ahmad Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post	112
48	M. Yousaf Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/Post	113
49	M. Hamayun	Trangri Sabir Shah	GGPS Khat Paloi	A/V/Post	114
50	Muhammad Javed	Darband	GGPS Pagora	A/V/Post	115
51	Fazal ur Rehman	Darband	GGPS Beer Bat	A/V/Post	116
52	Ghulam Rahmani	Tanda	GGPS Talian Mandi Gucha	A/V/Post	117
53	Nawab Khan	Dhodial	GGPS Kathri	A/V/Post	118

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.

(Signature)

(Signature)
 Muhammad Arshad Khan Tandoni
 Advocate
 Distt: Courts Abbottabad

رواد حیات عدالت

200/- روپے

P-11

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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.

In case they failed to assume the charge of their posts within 15 days of their appointment, candidature 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 Fund however they will contribute GP fund on the prescribed rate & half contribution will be made by the Government.

They will submit to this office, their all testimonial and domicile/ 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 Mansehra)

In case a document or documents is / are found fake or forged or Begus 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.

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 case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.

They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.

They may not be handed over the charge if their age is above 55 years and below 18 years.

The Candidates who are working as regular before 1st July 2001 in pervious post, their entitled for pension / gratuity etc.

No. TA/DA etc is allowed.

Charge report should be submitted to all concerned in duplicate.

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

Indst No. 5360-5384 /Estt: (F)Appt:PET(F)/2011-12 Dated Mansehra the 18th May, 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, Mansehra.
- 4-5. District Officer (M&F) Local Office.
6. Deputy District Officer (Female) E&SE Mansehra.
7. PA to District Coordination Officer, Mansehra.
8. Budget & Accounts Officer, local office, Mansehra.
- 9-67 Candidates concerned.

EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Attached

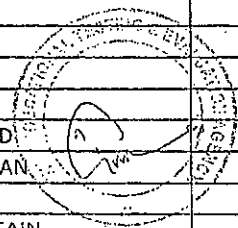
Muhammad...
Distt: Courts Abbottabad

2001-

Answer 4

TAT-1 FEMALE MANSEHRA RESULT 2011

Roll No	Name	Father Name	Marks	%age
1700116	BIBI SALIHA	ABDULLAH JAN	152	50.67
1700117	ASMAT BIBI	DILBER SHAH	48	Fail
1700118	AMINA BIBI	TAJ MOHD	48	Fail
1700119	SHIFQA BIBI	SKINDAR SHAH	136	45.33
1700120	JAMILA KHATOON	MOHD QASIM	108	Fail
1700121	IRUM RANI	MOHD JAVED	80	Fail
1700122	MASEEM NAWAB	NAWAB KHAN	0	Fail
1700123	HALEEMA SADIA	ABDUL LATEEF	104	Fail
1700124	SAIRA	ABDUL LATEEF	92	Fail
1700125	RIZWANA NOSHEEN	TAUS KHAN	96	Fail
1700126	NAZIA BIBI	SHER BAHADUR KHAN	76	Fail
1700127	NAZIA BIBI	SHER BAHADUR KHAN	Absent	#VALUE!
1700128	RIZUA RASHID	ABDUL RASHID	76	Fail
1700129	MASEERA KANI	SULTAN MOHD	44	Fail
1700130	UMARA ZEB	AURANGZEB	88	Fail
1700131	SABA RAIZ	M RAIZ	68	Fail
1700132	RABIA SHAFIQ	M SHAFIQUE	60	Fail
1700133	AMINA BIBI	NADAR KHAN	64	Fail
1700134	SORIA AMIN	AMIN UR REHMAN	52	Fail
1700135	BIBI NAHEEMA	ABDUL QAYUM	88	Fail
1700136	ARIFA	DURI AMAN	88	Fail
1700137	SAIMA	MOHD JAVED	84	Fail
1700138	UZMA RANI	GHULAM SARWAR	64	Fail
1700139	SAFINA BIBI	ABDUL KARIM	96	Fail
1700140	NAHEED ANWER	M ANWER	68	Fail
1700141	SADAF FAISAL	M SADIQ	88	Fail
1700142	SOBIA BIBI	M RASHID	76	Fail
1700143	NABILA	KHAWAJ MOHD	48	Fail
1700144	DILSHAD BIBI	AZIZ UR REHMAN	96	Fail
1700145	ANILA NOREEN	JEHAN ZEB	96	Fail
1700146	ZAHIDA BIBI	GUHLAM HUSSAIN	72	Fail
1700147	WAJEEHA	MUSASSAR SHAH	0	Fail
1700148	GHAZAL AKBER	ALI AKBER	120	40.00
1700149	FAIZA RANI	GHULAM NABI	48	Fail
1700150	BIBI FARAH	KHURSHED KHAN	156	52.00
1700151	LUBNA	MOHD TOFIAL	100	Fail
1700152	BIBI NASEEMA	GULAM NABI	124	41.33
1700153	CHAMAN BIBI	MOHD SALEEM	80	Fail
1700154	CHAN BIBI	M UMAR	76	Fail
1700155	ABIDA PARVIN	TOFIAL AHMED	68	Fail
1700156	MARIA	ABDUL QUDOUS	80	Fail
1700157	SADIA BIBI	TAFUL AHMED	48	Fail
1700158	IRUM AYUB	M AYUB	40	Fail
1700159	NOSHEEN GUL	MOHD BASHIR	88	Fail
1700160	NOSHEEN KANWAL	SAKINDAR HAYAT	144	48.00
1700161	FARAH NAZ	M BASHIR	44	Fail
1700162	BIBI NABILA	ADBUL RAHIM	220	73.33
1700163	GUL NAR	DAUD KHAN	0	Fail
1700164	NAZMA NISAR	NISAR MUHAMMAD	124	41.33
1700165	FARMINA NAZ	MOHD AZEEM	108	Fail
1700166	SADIA HALEEMA	SARWAR SULTAN	136	45.33
1700167	NELO FAR	MOHD AZEEM	152	50.67
1700168	HAJRA BIBI	ABDULLAH KHAN	Absent	#VALUE!
1700169	HALEEMA BIBI	JEHANGIR	92	Fail
1700170	NOSHEEN TABASUM	M AKRAM KHAN	148	49.33
1700171	NUSSRAT JABEEN	MOHD SADIQUE	68	Fail
1700172	IRUM SHAHEEN	M AKRAM KHAN	108	Fail



Attended

Muhammad Anis Iqbal

Dist: Faisalabad



Annex D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSHERA

Case No. 1772 / S. Cause
Dated this 12th day of July 2014

Email: deofmanshra@yahoo.com
Phone & Fax: 0997-302318

P-17

SHOW CAUSE NOTICE

I, Muhammad Nisar, District Education Officer (Female) Manshra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Bibi Farah, PST GGPS Gajar Gali Manshra Show cause notice as follows:

1) You were illegally appointed as PST at GGPS Gajar Gali vide defunct Executive District Officer (E&D) Manshra at S. No. 78, out of your own U/C, where you were stranger for recruitment process initiated through EATA. Acceptance of your appointment & 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. 88/S.A.100/311/17-17/2013 Umar Khair EDO BS-19 dated 25/08/2014. Moreover the then EDO (PST) has been removed from Government Service in connection with all such bogus appointment including yours made by him.

2) Along with the finding and recommendation of the inquiry committee, the amount on ground & other connected papers, including your defiance before the inquiry committee:

1. I am satisfied that you have committed the following acts/omissions mentioned in rules:

- a) dishonesty and dishonesty in getting bogus appointment without due process of recruitment.
- b) incurred huge financial losses to the Govt Treasury receiving pay as result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/evading the facts for unlawful appointment with collusion of then EDO.
- d) 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.
- e) You are hereby, 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.
- f) 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 event, ex-parte action shall be taken against you.
- g) A copy of the finding inquiry committee related page is enclosed.

Received

M. Nisar

Mst. Bibi Farah

COMPETENT AUTHORITY

12-07-2014

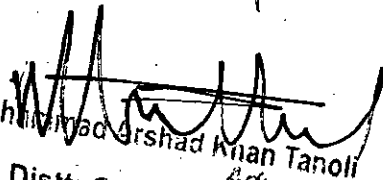
Mst. Bibi Farah

Arshad
Muhammad Arshad Khan Tanoli
Advocate
Distt. Courts Abbottabad

روپے 200/-

200/- روپے

UC Sawan Mera	BBI Parah r/o UC Sawan Mera	Appointed at GGPS Cagar gali UC Phulra being the adjacent UC which is not correct Phulra is not adjacent UC to Sawan Mera. (Annex-LXXXII).	Appointment is irregular
UC Sher Garh	Saeeda Haider r/o Sher Garh	Appointed at GGPS Ghakkar UC Sher Garh S.No 46. She had not entered her BA marks in her application form for 15.8.2011 result was declared and award of weightage of BA after the closing date is not valid. (Annex-LXXXIII)	Violation of recruitment rules/policy
UC Sher Garh	Fozia Bibi r/o UC Sher Garh	Although she was shown absent in BATA result under R.No 2045 but was included at S.No 47 of the appointment order appointed at GGPS Parchaia. (Annex-LXXXIV)	Appointment is not valid
UC Darband	Asma Abdul Malik r/o UC Darband	Appointed at GGPS Shoralian UC Sher Garh being the adjacent UC. But the UC Darband is not adjacent to UC Sher Garh. Some other candidates of UC Sher Garh were also waiting for appointment. The appointment of candidate of UC Darband in UC Sher Garh is not valid. (Annex-LXXXV)	Appointment is irregular and violation of rules.
UC Shoukat Abad	Sabeen r/o UC Shoukat Abad	Appointed at GGPS Chajra Bala UC Shandera whereas three posts were already vacant in UC Shoukat Abad	The appointment is against recruitment rules.
UC Tarangri Sabar Shah	Sidra Hamayun r/o UC Tarangri Sabar Shah	Appointed at GGPS Khali Paloi at S.No 55 UC Sum Elahi Mang and not in own UC where three posts were vacant.	The appointment in other UC is violation of recruitment policy
UC Bandi Shungli	Nosheen Bibi r/o UC Darband	Appointed in UC Bandi Shungli at GGPS Beerbat being adjacent UC which is not the adjacent UC. (Annex-LXXXVI)	The appointment is not valid as the near by UCs of UC Bandi Shungli are Khatai, Karori and Sher Garh.
UC Darband	Salma javed r/o UC Darband	Appointed at GGPS Bhagura. She was not qualified as BA up to the closing date of advertisement. Her BA result was declared on 15.8.2011. Award of BA weightage is not justified. (Annex-LXXXVII)	The appointment is invalid.

Attested

 Muhammad Arshad Khan Tanoli
 Advocate
 Distt: Courts Abbottabad

از جی ای فریج بی ای این ٹی دختر خورشید خان ساکن ترقی پورن کونسل ساہون پیرا

بنام ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ وقتانم عداہ مس مال پیرہ

دفعوں = شوکار فوٹس

یادداشت =

بجوارہ آمدہ از دفاتر (DF) مالانہ شوکار فوٹس
لینڈ نمبر 7772 مورخہ 29/1/2001 جواب ارسال خدمت ہے

1) میری بھرتی خالصتاً غیرت اور پالیسی کے مطابق ہوئی ہے

2) میں نے کوئی گورنمنٹ کولج صاحبان میں بیجا پاپہ اور اپنی
ڈیوٹی میں سرانجام دی ہے۔ اور ڈیوٹی میں ہرگز کاغذ خواہ
وصول نہیں کیا ہے۔

3) میں نے کسی کا حق نہیں مارا ہے اور میں نے ایٹا شیٹ پاس
کیا ہے۔ اور نہ ہی میں نے کوئی حقائق چھپائے ہیں

میں پورین کونسل ساہون پیرا کی دیہاتی یوں اور میری بھرتی
Adjucent پورین کونسل پالیسی کے تحت ملحقہ پورین کونسل میں
عام ضابطے اور قانونی امور سنبھالنے کے لئے مقرر ہوئی ہے

4) میری بھرتی عام قانونی تقاضے پورے کرنے کے لئے ہوئی ہے
اور یہ شوکار فوٹس کا آخری جواب ارسال خدمت ہے۔

یہاں چھ لکھو اس شوکار فوٹس سے مستثنیٰ کیا جائے۔

Adjucent پورین کونسل کا سرٹیفکیٹ درخواست سے منظور نہیں ہے۔

العراقی
جی ای فریج بی ای این ٹی
شوکار فوٹس

Attested
Muhammad Nihal Chahil
Distt: Courts ADU, Sahiwal

Annex ^E

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Bibi Farah D/O Khurshid Khan working as Dei GGHS/GGMS/GGP Gujar Gadi 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. Bibi Farah D/O Khurshid Khan CT/PET/TT Dei GGHS/GGM GGPS Gujar Gadi

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 2036-45 /AE-___/Estab: dated 03/03/2015.
Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, 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.

Attested

[Signature]

Dist: Courts Abbottabad

[Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

محرمت جنا - ڈائریکٹر صاحب ایڈمنسٹری اسیسٹنٹ ڈی ایچ ڈی ایچ

خبرہ و خستہ خواہ لیسٹ اور

Annex F

Annex F

پہلوں
اپیل برائے بحالی ملازمت

P-21

جناب عالی!

عرض ذیل ہے!

- 1- یہ کہ اساتذہ نگاروں ترقی تھری و صلح والہیرہ کی رہائی ہے
- 2- یہ کہ سال 2011-12 میں صلح والہیرہ میں حکمہ تعلیم میں PST پوسٹ پر تعیناتی ہوئی تھی (آرڈر لف ہے)
- 3- یہ کہ میرا تعلق یونین کونسل ساون میرا سے ہے۔ اور میں اپنی یونین کونسل میں میرا پوسٹ میں دوسرے پتھر پر تھی
- 4- یہ کہ ہماری یونین کونسل ساون میرا میں PST کی طرف ایک پوسٹ خالی تھی۔ جبکہ ساون میرا کے ملحقہ یونین کونسل پھلڑہ میں کسی PST کی پوسٹیں خالی تھیں
- 5- بالکسی کے مطابق اگر اپنی یونین کونسل میں پوسٹ خالی نہ ہو تو ملحقہ یونین کونسل میں آیدوار کو لیا جاتا ہے۔ اس لیے مجھے بھی ملحقہ یونین کونسل پھلڑہ میں لگایا گیا تھا، جو کہ بالکسی کے عین مطابق تھا
- 6- یہ کہ مورفہ 29.09.2014 کو DEO(F) والہیرہ کی طرف سے مجھے آپ Show-cause نوٹس وصول ہوا۔ جس میں تحریر تھا کہ آپ کی تعیناتی غیر قانونی ہے (کاپی لف ہے)

Accepted
Muhammad Han Zahid
Advocate
Distt. Courts Abbottabad

میں نے اس Show-Cause نوٹس کا جواب جمع کروایا تھا کیا

میری تعیناتی غیر قانونی ہے بلکہ قانون کے مطابق ہو گیا ہے

(کاپی لپیٹے)

P-22

8. یہ کہ مورخہ 03-03-2015 کو DEO (F) مالہرہ نے

میری سرکاری کام آرڈر جاری کیا

(کاپی لپیٹے)

جناب عالی!

میری تقرری قانون کے مطابق ہو گیا ہے اور DEO (F)

مالہرہ نے مجھے غیر قانونی طور پر ملازمت سے برخاست کر دیا ہے

استدعا ہے کہ میری اپیل کو منظور فرماتے ہوئے مجھے

PST پوسٹ پر بحال کرنے کے احکامات صادر فرمائیں

عسین نواز شاہ ہونگی

العرض

علیہ

بی بی فریح

گورنمنٹ گنرٹری اسکول ٹیمپلی

11/03/2015

Attended

Mulapur, District Court, Multan
District Court Multan

قیمتی

کورٹ فیس

وکالت نامہ

بعدالت RPR سروریل ٹریڈ لیمیٹڈ
عنوان: کی بی فرح PS نام کورٹوف RPR ایچ این آر

منجانب: وسلا

نوعیت مقدمہ: اسلے

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آل مقام
مہر ارسد خان سخی اور مگر دستِ حاکمی گورٹ و سب اہل

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب
موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
وصولی چیک روپیہ دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
کی کل یا کسی جزوی کارروائی 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 پر داختم 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 براد 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:

Allesed

M. Akshad Jhar Tanoli

Adv. High Court A+A

BIBI Farah

کی بی فرح


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 reinstated 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

- 03/2015

**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.
2. ~~Appeal may be accepted as she is required to be adjusted in adjacent U/C. 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.'

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4113-28 /F.No. 79 /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
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