

21.1.2016

Agent of counsel for the appellant and Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 15.8.2016 at Camp Court A/Abad.

Chairman  
Camp Court A/Abad

15.08.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Learned counsel for the appellant pressed into service copy of notification dated 23.11.2015 vide which the appellant has been reinstated in service. Requested for withdrawal of the appeal

In the light of the afore-stated developments, the appeal is dismissed as withdrawn. File be consigned to the record room.

Member  
ANNOUNCED  
15.08.2016

Chairman  
Camp court, A/Abad.

15.08.16

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.

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. Requested for adjournment. To come up for written reply/comments on 21.01.2016 before S.B at Camp Court A/Abad.

  
Chairman  
Camp Court A/Abad.

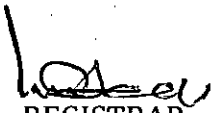

Appellant Deposited  
Security & Process Fee



Form- A  
FORM OF ORDER SHEET

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

Case No. 758/2015

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 Syeda Slama 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. 778/2015

Bushra Bibi D/O Lal Khan (GGHSS Sawan Maira) R/O Phulrha  
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"	12-23
4	Copy of appointment order and corrigendum	"C"	24-25
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	26-29
6	Copy of impugned dismissal order of appellant	"E"	30
7	Copy of departmental appeal /representation	"F"	31-34
8	Copy of merit list	"G"	35-36
9	Wakalatnama		

Dated: 7/7/2015

*Bushra*  
Appellant

Through

**Muhammad Arshad Khan Tanoli**

Advocate, High Court

Abbottabad

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Appeal no. 778/15 ①

A.W.F. Province  
Service Tribunal  
Diary No. 79/  
dated 8/7/15.

Bushra Bibi D/O Lal Khan (GGHSS Sawan Maira) R/O Phulrha  
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 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"

Filed to day  
L. Q. Khan  
8/7/15

②

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

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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

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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:-

### GROUNDS

- 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.



- 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

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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

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removal of Umar Kúndi 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

*Bunhu*  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

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**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Bushra Bibi D/O Lal Khan (GGHSS Sawan Maira) R/O Phulrha  
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 <sup>33</sup>/<sub>33</sub> 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

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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: 7/5/2015

*Bunhe*  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

(19)

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Bushra Bibi D/O Lal Khan (GGHSS Sawan Maira) R/O Phulrha  
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, Bushra Bibi D/O Lal Khan (GGHSS Sawan Maira) R/O Phulrha 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: 7/5/2015

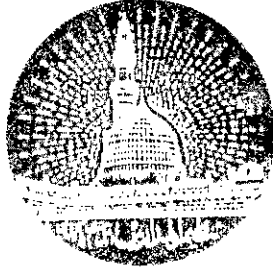
Bushra  
Deponent



Annex B  
بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

12 تَنْظِیْمُ الْمَدَارِسِ (أَهْلُ السِّنَّةِ) بَاكِسْتَانِ (مُسَبَّحَةٌ)

Nº 005136



الرقم السلسل ۱۶۶۴

شَهَادَةُ التَّجْوِیْدِ وَالْقِرَاءَةِ

الْحَمْدُ لِلَّهِ رَبِّ الْعَالَمِينَ وَالصَّلَاةُ وَالسَّلَامُ عَلَى نَبِيِّهِ وَآلِهِ وَاصْحَابِهِ الْمَجِيدِينَ

شَهِدْنَا أَنَّ الْقَارِيهَ بَشْرَى بِي بِي بِنَ ابْنَتٍ لَعَلْ خَانَ

وَرَقْمُ التَّجْوِیْدِ ۱۸۸۶ وَرَقْمُ الْجُلُوبِ ۱۰۲۵

مِنْ طَلَبِ دَارِ الْعِلْمِ الْحَقَائِقِيَةِ الْبِرَكَاتِيَةِ لِلْبَنَاتِ بِنَهْرِهِ وَالسَّهْرَةِ

فَدَخَلْنَاكَ / حَصَلَتْ عَلَى شَهَادَةِ التَّجْوِیْدِ وَالْقِرَاءَةِ بَعْدَ جُتْيَا الْأَمْتَحَانِ

الْمَنْعَقَدِ بِأَسْتَرْفِ تَنْظِیْمِ الْمَدَارِسِ (أَهْلُ السِّنَّةِ) بَاكِسْتَانِ

فِي ۱۴۲۹ هـ الْمَوْفِقِ ۲۰۰۸ ش بِتَقْدِيرِ الْمَمْتَازِ مَعَ الشَّرْفِ وَعَدَدِ دَرَجَاتِهِ ۲۰۰/۱۹۱ فِقْطَ

وَسَلَّمَ اللَّهُ عَزَّ وَجَلَّ أَنْ يَشْكُرَكَ بِهِ / بِهَاسِبِينَكَ الْعُلَمَاءَ الْعَاطِلِينَ

Attested.

الرئيس  
الرئيس

الامين العام

الرئيس  
تنظيم المدارس (أهل السنة)

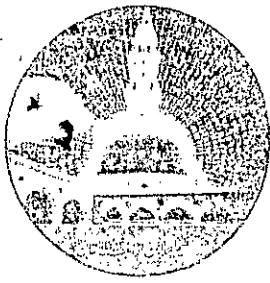
الامين العام  
تنظيم المدارس (أهل السنة)  
باكستان

المكتب المركزي  
تنظيم المدارس (أهل السنة) باكستان  
التنسيه ستريت  
كشمري شامرو لاهور

محل الاصدار

تاريخ الاجراء رمضان المبارک ۱۴۲۹ هـ





# تنظیم المدارس اہل سنت پاکستان

8-راوی پارک، راوی روڈ لاہور

فون: 042-37731047 042-37731048

فون: 042-37731046 042-37731045

دفعہ نمبر: J=2285-12  
تاریخ: 18-11-12

13

## ﴿ تصدیق نامہ ﴾

### VERIFICATION OF HIFZ & TAJWEED CERTIFICATES.

اس امر کی تصدیق کی جاتی ہے کہ ”بشری بی بی بنت لعل خان“ نے تنظیم المدارس اہل سنت پاکستان کے زیر اہتمام حفظ و تجوید قرأت کے سالانہ امتحان منعقدہ رمضان المبارک ۱۴۲۹ھ میں شرکت کی اور کامیابی حاصل کی، جس پر ”حفظ القرآن“ کی سند نمبر ۶۰۳۶، سیریل نمبر 012522 کے تحت جبکہ ”تجوید قرأت“ کی سند نمبر ۱۰۲۵، سیریل نمبر 005136 کے تحت اسناد جاری کی گئی ہیں۔  
لہذا اسناد ہذا مرکزی دفتر تنظیم المدارس اہل سنت پاکستان کے ریکارڈ کے مطابق اور درست ہیں۔

من جانب

مفتی محمد رمضان سیالوی  
معاون خصوصی ناظم اعلیٰ  
مرکزی دفتر تنظیم المدارس اہل سنت پاکستان

Muhammad  
Certificate  
P.O. Box: Abbottabad

www.tanzeemulmadaris.edu.pk

Email: tanzeemulmadarispk@yahoo.com

Javaid on "Tmjkpc14" (Z:/Tanzeem/Letters/Objctions/L.No. 339)



تنظیم المدارس اہل سنت پاکستان

ممبرانہ

جامعہ اکیڈمی فیض العلوم

آبڑ آباد، کالی سڑک، تحصیل کٹواں، ضلع گوجرانوالہ  
فون: 056-2213073

فون: 0301-8484071, 0321-8484871

صوبہ خیبر پختونخوا

جامعہ اسلامیہ حقیفہ

(مدینہ منورہ) کلاں، تحصیل کٹواں، ضلع گوجرانوالہ

فون: 0307-5504115

فون: 0300-4502182, 0301-8421161

صوبہ خیبر پختونخوا

وزارت العلوم اچھریہ

پاکستان مرکزی سروس

فون: 021-34948581, 34127304

فون: 0321-9219569

صوبہ پنجاب

وزارت العلوم خوشیہ سلطانپور

مدنی ضلع سلطانپور، لوہستان

فون: 0832-415429

فون: 0301-3725896

صوبہ گلگت

وزارت العلوم سیٹھ ان سٹرام

نورنگر، گلگت، ضلع گلگت

فون: 05822-446513

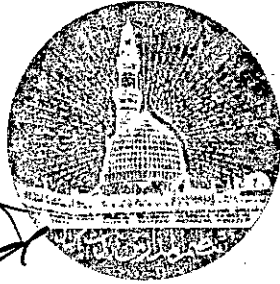
فون: 0300-5073573

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

(14)

# تنظیم المدارس (اہل سنت) پاکستان

No: 012522



Admission

Muhammad Ali Jinnah  
Historical Centre Abbottabad  
حفظ قرآن اور تفہیم

تاریخ اجراء ۸ ستمبر ۲۰۰۸ء

نمبر شمار ۱۱۰۳۶

تصدیق کی جاتی ہے کہ حافظ / حافظہ بشری بی بی بن / بنت لعل خان  
دارالعلوم / مدرسہ حقانیہ برکاتیہ للبنات مرکزی جامع مسجد قبا پلھودہ مانسہرہ نے  
حفظ قرآن پاک کی سعادت سے بہرہ ور ہونے کے بعد تنظیم المدارس (اہل سنت) پاکستان  
کے تحت حفظ کے امتحان میں کامیابی حاصل کی اور اس سہولت کے مستحق قرار پائے / پائی ہیں۔  
اللہ تعالیٰ عزیزم / عزیزہ کو قرآن پاک کی برکتوں اور اعمال صالحہ کی دولت سے مالا مال فرمائے

آمین بجاہ نبیہ الکریم علیہ التحیۃ والتسلیم

مستطاب  
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مستطاب



Roll No 15982

181



Regd. No 10M86/11-116

# GOVERNMENT GIRLS DEGREE COLLEGE NO. 2

MANSEHRA

B:A/B.Sc. Annual Exam: 2011

## PROVISIONAL CERTIFICATE

Certificate that Miss Bushra Bibi  
Daughter of Lal Khan and a regular  
student of this college under college Roll No 656. She appeared as regular  
candidate in the B.A/B.Sc. (Annual) Examination of the Hazara University, Mansehra &  
according to the Result Gazette issued by the Hazara University is declared successful in  
the above said Examination, Obtaining 354 marks in  
B.Sc Grade Div I.

### SHE HAD PASSED THE FOLLOWING SUBJECTS:-

- |                 |                   |                        |
|-----------------|-------------------|------------------------|
| 1. English      | 2. Urdu           | 3. Pak. Studies        |
| 4. <u>Maths</u> | 5. <u>Physics</u> | 6. <u>Computer Sci</u> |

Her date of Birth according to the S.S.C is 26-12-1991

## CHARACTER CERTIFICATE

Her conduct during her stay in this college was GOOD

Dated: 24 Sept 2011

*[Signature]*  
Principal

Govt. Girls Degree College  
No.2 (PRINCIPAL)  
Mansehra.

*Attested*

*[Signature]*  
Muharraf Ahmad Khan  
Principal  
Govt. Girls Degree College  
No.2 Mansehra

Certificate No: AB 179649

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 46320  
Group: COMP:GEN/  
SCIENCE

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION  
DETAILED MARKS CERTIFICATE

Part - II  
Session: 2009 (Annual)

16

Name: BUSHRA BIBI  
Father Name: LAL KHAN  
Reg No: 0075212108  
Institution/  
District: GOVT. GIRLS DEGREE COLLEGE NO 2 MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of April/May as a Regular Candidate.

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	62	--	56	--	118	One Hundred Eighteen
Urdu (Comp)	200	65	--	84	--	149	One Hundred Forty Nine
Islamic Education	50	33	--	--	--	33	Thirty-Three
Pakistan Studies	50	--	--	30	--	30	Thirty Only
Mathematics	200	43	--	39	--	82	Eighty-Two
Physics	200	35	12	51	8	106	One Hundred Six
Computer Science	200	11	15	43	19	118	One Hundred Eighteen
						636-C	Six Hundred Thirty-Six Only

6/9/09  
RESULTS  
HSSC  
1100

SECRETARY  
Board of Intermediate  
& Secondary Education  
Abbottabad

Remarks :

Date : 23 July, 2009

Checked By :

Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

Attested  
Muhammad Hanif  
Advocate  
Distt: Courts Abbottabad



ADA No 221271

Roll No. 928

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTABAD



21

Abbotabad N.W.F.P. - Pakistan

SECONDARY SCHOOL EXAMINATION CERTIFICATE  
SESSION ANNUAL 2007

This is to certify that BUSHRA BIBI

Daughter of LAL KHAN

A candidate from GOVT. GIRLS HIGH SCHOOL PHULRA MANSEHRA

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbotabad held in April/May, 2007 as a regular candidate. She has obtained 569 marks out of 900 and has been placed in Grade B Representing VERY GOOD.

The candidate passed in the following subjects:

- |                |            |              |
|----------------|------------|--------------|
| 1. ENGLISH     | 2. URDU    | 3. ISLAMIYAT |
| 4. PAK STUDIES | 5. MATHS   | 6. PHYSICS   |
| 7. CHEMISTRY   | 8. BIOLOGY |              |

Date of Birth according to admission form is TWENTY-SIXTH DECEMBER

One Thousand Nine Hundred and NINETY-ONE ( 26-12-1991 )



Asst. Secretary

This certificate is not valid without the official stamp.

Secretary

Attested

M. S. ...

Abbotabad

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



## Serial No. 156020 PROVISIONAL RESULT CARD

Name: MUHAMMAD HUSSAIN  
 Father's Name: I. A. KHAN  
 Address: HOUSE NO. 11, STREET NO. 1, PHASE NO. 1, G-7/1, ISLAMABAD

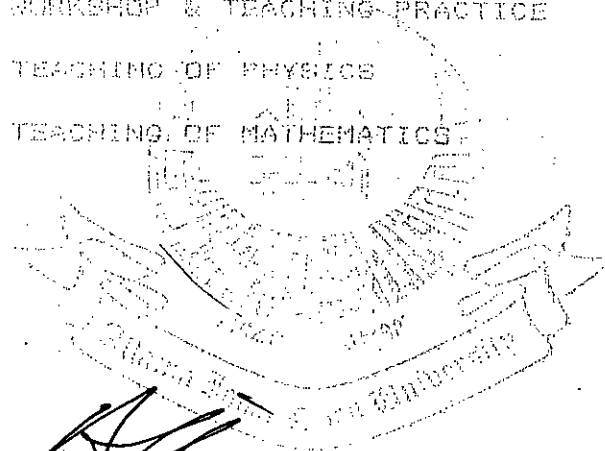
Roll No. AP639200  
 Registration No. 12NMA02054  
 Final Semester SPR-2013

Tehsil: HANSA  
 District: FATA  
 has successfully completed BACHELOR OF EDUCATION (B. ED)

22

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR-13	0011	PERPECTIVES OF EDUCATION	100	66
SPR-13	0013	SCHOOL ORGANIZATION	100	68
SPR-13	0014	EVALUATION, GUIDANCE & RESEARCH	100	68
SPR-13	0018	EDUCATIONAL, PSYCHOLOGY & CURRICULUM	100	66
SPR-13	0031	ENGLISH (COMPULSORY)	100	68
SPR-13	0032	ISLAM, PAKISTAN AND MODERN WORLD	100	67
SPR-13	0450	WORKSHOP & TEACHING PRACTICE	100	74
SPR-13	0462	TEACHING OF PHYSICS	100	67
SPR-13	0463	TEACHING OF MATHEMATICS	100	75



*Attested*

Muhammud Ali Khan  
 Advocate  
 Distt: Courts Abbottabad

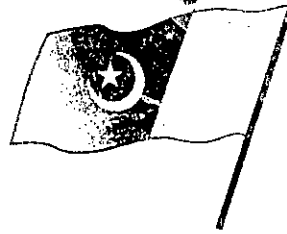
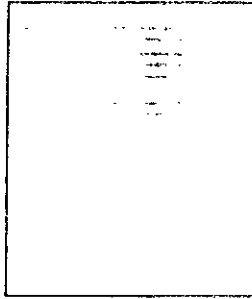
CREDITS: 6 Total Marks / Obtained: 900 / 619  
 Result Declared on: DECEMBER 26, 2013 Percentage / Grade: 69 B  
 Date of issue: JANUARY 15, 2014

*[Signature]*

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

**Controller of Examinations**

# DOMICILE CERTIFICATE



23

I declare that I was born of parents who are permanently domiciled in N.W.F.P. having belonged to in by birth / settled in it.

I belong by birth to Village / Mohalla PHULRA

Tehsil MAN SEHRA District MAN SEHRA

Muhammad Aslam Khan  
Advocate  
Distt: Courts Abbottabad

Bu  
Signature of Applicant

Dated: 03/07/2007

Pursuance to the declaration dated \_\_\_\_\_

filed by BUSHRA BIBI S/D/W/ of LAL KHAN

Domiciled in the N.W.F.P. it is hereby certified that PERSON

the said PERSON

is born parents who are permanent residents of the N.W.F.P.

having belonged to it by birth/settled in it.

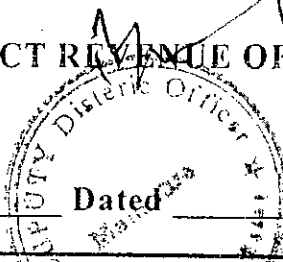
I have satisfied myself personal / me knowledge verification that the above declaration is true and certify.

This 9th day of July 2007

COUNTERSIGNED DEPUTY DISTRICT REVENUE OFFICER

No. 4898 D. 20.7.07  
Cm. [Signature]

District Officer No. \_\_\_\_\_ Dated \_\_\_\_\_







*Amra C,*

**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.6200-380-176-00 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:-

*P-24*

S#	Name	Father Name	Address	Place of Posting	Remarks
1	BIBI BUSHRA	FIDA HUSSAN	MANGLOOR	GGHS HASSA	A/V/Post
2	SHAZIA	M AFZAL KHAN	BANDA GESUCH	GGHS JADORI	A/V/Post
3	FATIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DOGA	A/V/Post
4	FARIHAT BIBI	M.HAMAYUN	DHC-DIAL	GGHS DYARYAL	A/V/Post
5	MANAZZA	MOHD HAMYUN	TRANGRI BALA	GGHS MURAD PUR	A/V/Post
6	MADHIA BIBI	ALI KHAN	AFZALABAD	GGHS AFZAL ABAD	A/V/Post
7	BIBI SAEEDA S/LAMA	FIDA HUSAIN	MANGLOOR	GGHS THATHI KHURD	A/V/Post
8	ASMAT BIBI	ABDUL FEHMAN	LASSAN NAWAB	GGHS LASSAN NAWAB	A/V/Post
9	BIBI MARIUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	A/V/Post
10	SAMMIYA RAHIEM	RAHIM SHAH	OGHI MANSEHRA	GGHS Oghi	A/V/Post
11	SAIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLIAN	A/V/Post
12	ALYIA BIBI	ALI KHAN	AFZALABAD	GGHS SANGAR	A/V/Post
13	AYSHA KANWAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID ALI	A/V/Post
14	AMBER ZED	ALAM ZEB	PHULRA	GGHS PHULRA	A/V/Post
15	AISHA BANO	SHAHZADA	M.M. POLE MANSEHRA	GGHS BAIFA	A/V/Post
16	BUSHRA BIBI	LAL KHAN	PHULRA	GGHS SEWAN MAIRA	A/V/Post
17	MAMOONA WAJID	WAHJID	EHARKUND	GGHS SHINOOL	A/V/Post
18	HAMEEDA	MOHD YOUSAF	PHULRA	GGHS JARED	A/V/Post
19	TABSUM	MOHD NAZIR	OGHI MANSEHRA	GGHS TIWRA	A/V/Post
20	SABA NOOR	SHEIKH NOOR ELLAHI	MANSEHRA	GGHS TALHATA	A/V/Post
21	ASMA NAZ	RAJA MANZOOR HUSSAIN	BE-TALI	GGHS MOHAYIAN	A/V/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:**

- Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice
- 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.
- In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will stand automatically cancelled.

*Attested*

Muhammad...  
District Officer  
District: Courts Abbottabad


(25)

4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GF 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, Mansehra) (b) duly attested & verified registration copy of the concerned Dini Madrasa (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 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 1<sup>st</sup> July 2001 in previous 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 CDU, MANSEHRA

Endst: No 893-942 / Estt: (F) Appnt: Qaria (F) 2012 Dated Mansehra 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, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-26. Principal/Headmistresses School concerned.
27. PA to District Coordination Officer, Mansehra.
28. Budget & Accounts Officer, local office, Mansehra.
- 29-50. Candidates concerned.

*Attested*  
  
 EXECUTIVE DISTRICT OFFICER,  
 E&S MANSEHRA  
 Dist. Courts Mansehra



Annex D

26

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7742 / DEO/2014

Email: deofmansehra@yahoo.com

Dated: 29/9/ /2014

Phone & Fax: 0997-302518

To

Head Mistress  
Govt. Girls High School

Subject:

Sacred Name

SHOW CAUSE NOTICE

Memo:

Show Cause notice in respect of Mst Bushra Bibi Qaria D/O  
Lal Khan 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.

  
DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.

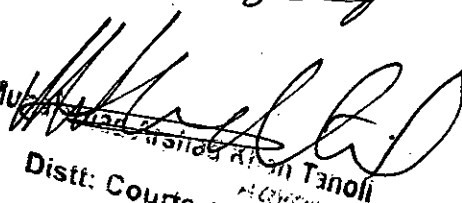
Endst.No. \_\_\_\_\_

Copy to the:-

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

DISTRICT EDUCATION OFFICER  
FEMALE MANSEHRA.



  
Muzaffar Ahmad Khan Tanoli  
Advocate  
Dist: Courts Abbottabad



**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**

No. 7742 / Establishment/ 2014  
dated: 29/8/ / 2014

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

27

**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. Bushra Bibi D/O Lal Khan Qaria, Govt. Girls High School Sawan Maira Mansehra, Show cause Notice as follows:

1) You were appointed as **Qaria** at GGHS-Sawan Maira, 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 well & 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.

3) 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.

4) You are thereof, required to Show Cause as to why the aforesaid penalty should not be

A. Usheed

Mina

Distt. Courts Abbottabad

28

GGHS Maira Ahmad Ali	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.
GGHSS Baffa	The Sanad issued by Trust Jammiat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment whereas the sanad e Hifz is <u>not from recognized Institution.</u>	The appointment is not valid and is against the recruitment rule/policy.
GGHS Sawan Maira	Application form and Sanad is not available on record.	The appointment is not valid and is against the recruitment rule/policy.
GGHS Ghanool	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy.
GGHS Jared	Sanad Hifz ul Quran is from recognized institution but no Sanad Tajweed is available with the form.	The appointment is not valid and is against the recruitment rule/policy.
GGHS Traura	Sanad Hifz ul Quran is from recognized institution but the Sanad issued by Trust Jammiat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment and Qirrat sand not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy.
GGHS Talhata	No relevant Sanad for appointment.	The appointment is not valid and is against the recruitment rule/policy.
GGHS Mohayian	Sanad Hifz ul Quran is from recognized institution but Sanad	The appointment is not valid and is against the

A. Wested  
Muhammad A. Wested  
Advocate  
Distt: Courts Abbottabad

حکومت پنجاب ڈسٹرکٹ ایجوکیشن آفیسر زمانہ مدارس ضلع مالیر

29

SHOW CAUSE NOTICE  
NO 7742/DEO/2014 Dated 29-9-2014

صائب عالمہ ا

مذاشرت ہے کہ سائبر ٹورنٹ گریجویٹ اسکول ساون میرا (مالیر) میں Davia یوسٹ پری تعینات ہے۔ آپ کے دفتر سے نوٹس وصول ہوا ہے فورم نمبر 27-10-2014 کر لیزا Show Cause Notice میں جو الزامات

نقائے تھے ہیں ان کے جوابات مقررہ زمانہ میں

علا سائبر کا نام مکتوبہ کی کاپی کی کاپی میں سرین ملبرکا پیرج جس میں لکھا ہوا ہے کہ تمام کاغذات درست اور ایسی بخش ہیں

پیرج میرٹ لیٹ ETA TAT II کے مطابق سائبر کا نام سرین ملبرکا 17 مارچ جس میں سائبر پاس ہے۔

3 سائبر کی سند تجویز اور حفظ کی اسناد نامیل میں موجود ہیں

4 Application Form دفتر کی رقم داری ہے سائبر نے فارم جمع کیا تھا اسی کے ٹیسٹ ادا کیا ہوا اور میں پاس ہوئی اور آپت Appointment ہوئی ہے۔ لیزا آپ سے مذاشرت ہے کہ مہربانی درخواست اور جوابات پر بعد روانہ غور فرمایا جائے

آئی جی عین نواز سندھو

الحارث

Muhammad Arshad Khan Tanvir Advocate

Muhammad Arshad Khan Tanvir Advocate  
Dist: Courts Abbottabad



Annex

E

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

P 30

- 1: Where as Mst: Bushra Bibi D/O Lal Khos working as DA GGHS/GGMS/GGP Saucon Maria 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 Pakhtunkhawa 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. Bushra Bibi D/O Lal Khos CT/PET/TT Qaria GGHS/GGM/GGPS Saucon Maria

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No. 1616-25 /AE- I /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 GGHS-Saucon Maria
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: Bushra Bibi Qaria
10. Office File.

Attested

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Muhammad Ali Khan Farooq  
Advocate  
Distt: Courts Abbottabad



To,

The Director (E&SE)  
Peshawar.

*Amnes*

*Budra 31*

Subject: DEPARTMENTAL APPEAL/ REPRESENTATION.

1. Reference made to dismissal order Endst. NO. 1616-25/AE-I/Estab dated 03/03/2015. Copy attached.
2. That the applicant writes to submit as under;-
  - i. That as per advertisement appeared in the daily news paper, the applicant submitted her documents to ETEA authorities for ETEA test on 19/06/2012. Copy bank challan dated 19/06/2012 and is attached.
  - ii. That the applicant passed ETEA test and there after qualified interview for the post of Qaria.
  - iii. That EDO (E&SE) Mansehra issued appointment order of the applicant purely on the basis of merit vide order Endst. No. 893-942/Esst dated 16/06/2012 and the applicant was posted to Govt. Girls High School Hassa against the vacant post of Qaria.

*Attested*

Muhammad

*[Signature]*  
District Officer  
Abbottabad

- iv. That the applicant is eligible for the post of Qaria according to the recruitment policy and qualification prescribed for appointment for the said post.
- v. That thereafter, the applicant was transferred from GGHS Hassa to GGHS Sawan Maira. (Copy of transfer order of the applicant is attached).
- vi. That the applicant is qualified Tajveed ul Quran and Hifz ul Quran and obtained Sanads/ certificates from the recognized institutions. (Copies of Sanads are attached).
- vii. That the applicant served in the Education Department from the date of appointment till the date of impugned dismissal order dated 03/03/2015 with complete devotion/ dedication and to the entire satisfaction of her superiors.
- viii. That DEO(F) Mansehra issued impugned dismissal order referred in Para No. 1 above which is malafide, against the law, perverse, and void and liable to be set aside on the following grounds:-

Attested  
 Muha  
 Dist: Courts  
 Advocate

GROUNDS:-

33

- a. That the applicant was recruited according to the prescribed rules as well as on merit on the basis of requisite qualification. Therefore, applicant is entitled to remain in Govt. service as Qaria.
- b. That District Education (Female) Mansehra dismissed the applicant but some similar employees have not been dismissed by her. Hence dismissal order of the applicant is discriminatory and same is not maintainable at law.
- c. That the DEO(F) (E&SE) Mansehra has made room to accommodate some blue eyed chaps who are in her good books.
- d. That impugned dismissal order is against the law and without lawful justification.
- e. That as per law, DEO(F) was supposed to issue statement of allegations, show case notice, and conduct proper inquiry but the requisite formalities have not been observed.

Attested

Muhammad Iqbal Khan Tanoli  
Advocate  
Distt: Courts Abbottabad

It is further added that the applicant was not afforded opportunities of personal hearing as well as Cross Examining the person who leveled allegations against her. Hence dismissal order is based on hypothesis, surmises and conjectures.

- f. That valuable rights to continuing service in Education Department have been accrued to the applicant and DEO(F) Mansehra dis not mention apointemtn order of the applicant and the impugned dismissal order. Hence impugned dismissal order is illegal and liable to be cancelled.
- g. That District Education Officer (F) being Inquiry Officer is not competent to issue dismissal order of the applicant as per law.

It is, therefore, prayed that on acceptance of instant departmental appeal, impugned dismissal order dated 03/03/2015 of the applicant may graciously be set aside.

Dated; 10/3 /2015

Your's sincerely

Attested

Muhami ~~Shah Khan~~ ~~Sanoli~~  
Advocate  
Distt: Courts Abbottabad

*Bushra*  
(BUSHRA BIBI)  
D/o Lal Khan  
Qaria Govt. High School  
Sawan Maira.

Annex 4 C

35

Femal Milt 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. OF RESULT	ETE A Marks	Academic																	T/Pe	Remarks
									ETE A MARKS		SSC			FA/FSC			BA/BSC			MA/MSC							
									Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page	Obt	Tot	Page					
1	330	BIBI BUSHRA	FIDA HUSSAN	QARIA	MANGLOOR	02/02/1986	23/08/2007	184	300	24.533	548	850	9.671	687	1100	9.368	301	550	5.473				49.04				
2	756	SHAZIA	M AFZAL KHAN	QARIA	BANDA GESUCH	08/07/1977	2007	172	300	22.933	493	850	8.7	642	1100	8.755	268	550	4.873	679	1100	3.086	48.35				
3	85	AYSHA	M SADIQ	QARIA	OGHI MANSEHRA	18/03/1987	17/07/2008	136	300	18.133	541	850	9.547	641	1100	8.741	326	550	5.927	799	1100	3.632	45.98	Has been selected as AT			
4	328	FATIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR (3)	01/04/1984	09/08/2003	164	300	21.867	567	850	10.01	614	1100	8.373	311	550	5.655			0	45.90				
5	583	Farhat Bibi	M.Hamayun	QARIA	Dhodial	18/02/1981	14-03-200	136	300	18.13333	489	850	8.276	686	1100	9.355	312	550	5.673	770	1100	3.5	44.94				
6	440	MANAZZA	MOHD HAMYUN	QARIA	TRANGRI BALA	20/04/1988	17/09/2006	152	300	20.267	517	850	9.124	729	1100	9.941	293	550	5.327				44.66				
7	454	MADHIA BIBI	ALI KHAN	QARIA	AFZALABAD	04/11/1988	01/10/2002	172	300	22.933	654	850	11.54	711	1100	9.695	0	0	0	0	0	0	0	44.17			
8	331	BIBI SAEEDA SALAMA	FIDA HUSAIN	QARIA	MANGLOOR (1)	18/04/1979	1998	176	300	23.467	507	850	8.947	531	1100	7.241	236	550	4.291				43.95				
9	688	ASMAT BIBI	ABDUL REHMAN	QARIA	LASSAN NAWAB	02/08/1981	17/05/2009	172	300	22.933	449	850	7.924	844	1100	7.418	280	550	5.091				43.37				
10	329	BIBI MARIUM	FIDA HUSSAIN	QARIA	MANGLOOR (4)	08/09/1986	09/08/2003	176	300	23.467	458	850	8.082	520	1100	7.091	240	550	4.364				43.00				
11	731	SAMMIYA RAHIEM	RAHIM SHAH	QARIA	OGHI MANSEHRA	08/02/1988	01/12/2010	132	300	17.6	510	850	9	738	1100	10.06	488	800	5.85	0	0	0	42.51				
12	327	SAIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR (2)	01/04/1982	09/08/2003	140	300	18.667	559	850	9.865	557	1100	7.595	235	550	4.273				40.40				
13	453	ALYIA BIBI	ALI KHAN	QARIA	AFZALABAD	27/08/1988	01/10/2002	164	300	21.867	378	850	6.671	536	1100	7.309	217	550	3.945				39.79				
14	92	AYSHA Krawal	Khalil ur Rehman	QARIA	Labarkot	08/12/1991	2004	164	300	21.86667	578	900	9.65	539	1100	7.35	0	0	0				38.67				
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				38.27				
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				36.27				
17	439	BUSHRA BIBI	LAL KHAN	QARIA	PHULRA	26/12/1991	2008	128	300	17.067	569	900	9.483	838	1100	8.673	0	0	0				35.22				
18	812	MAMOONA WAJID	WAHJID	QARIA	BHERKUND	12/08/1992	02/05/2003	120	300	16	812	900	10.2	857	1100	8.959	0	0	0				35.16				
19	200	HAMEEDA	MOHD YOUSAF	QARIA	PHULRA	20/06/1987	09/02/2009	124	300	16.533	768	1275	9.035	547	1100	7.459	0	0	0				33.03				
20	469	TABSUM	MOHD NAZIR	QARIA	OGHI MANSEHRA	27/04/1989	2007	166	300	20.8	662	1050	9.457	0	0	0	0	0	0				30.29				
21	139	SABA NOOR	SHEIKH NOOR ELLAHI	QARIA	MANSEHRA	18/02/1985	24/11/2000	132	300	17.6	666	1000	9.99	0	0	0	0	0	0				27.59				
22	2002	ASMA NAZ	MANZOOR HUSSAIN	QARIA	BEHALI			136	300	18.13333	490	850	8.647	0	0	0	0	0	0				26.75				

Mansehra District Council Mansehra

Distt. Edu. Mansehra

28

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Sr	Roll No	Name	Father Name	Post Applied for	Address	D/O BIRTH	DATE OF DEC. OF RESULT	ETE A Marks	Academic																
									ETE A MARKS		SSC			FA/FSC			BA/BSC			MA/MSC					
									Tot	Plage	Obt	Tot	Plage	Obt	Tot	Plage	Obt	Tot	Plage	Obt	Tot	Plage			
23	81	TAHIRA NIAZ	NIAZ 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	0	23.97
24	275	GHAZALA JAVED	MOHAMMAD JAVEED	QARIA	MANSEHRA	17/05/1984		124	300	16.53333	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	0	23.52

*A. Mustafa*

*Pa. S  
A: D-0  
Baital (F)*

*Jan*  
DO (Female)  
IE & SI Edu. Mansehra

*AD-0  
Baital (F)*

Muhammad Anwar Khan Tanoli  
Advocate  
District Courts Association  
District Courts Association

قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت KPK سرسہ سہ عمل لیت اور

عنوان: بنام گورنمنٹ KPK ایجوکیشن ڈپارٹمنٹ

منجانب: اسٹیک

نوعیت مقدمہ: رسد

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام

محمد ارشد خان نیلی اور گورنمنٹ ایجوکیشن ڈپارٹمنٹ

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 و عرضی 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 داختمہ 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 دائرہ کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند ہے۔

المرقوم:

بمقام:

Attested

M. Arshad Khan Nili  
Adv High Court Ad

شہری می سی  
Bundoo

(1)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL**  
**CAMP COURT ABBOTTABAD.**

**Appeal No 778/2015**

Mst: Bushra Khan, D/O Lal Khan, Qaria, GGHSS Sawan Mera R/O Phulra, Tehsil & District  
Mansehra .....**APPELLANT**

**Versus**

1. Govt of Khyber Pakhtun Khawa, through Secretary Elementary and Secondary Education, Peshawar and others.
2. Director Elementary and Secondary Education, Govt. of Khyber Pakhtun Khawa, Peshawar.
3. District Education Officer (Female) District Mansehra.

.....**RESPONDENTS.**

Written reply on behalf of Respondents 1 to 3.

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action to file the present appeal.
2. That the appeal is not maintainable in its present form.
3. That the appeal is time-barred and not entertain able.
4. That the appellant has not come to this tribunal with cleans hands.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appeal is based on false and mala fide hence deserves dismissal.
7. That the appellant has suppressed the original facts from this Honorable Service Tribunal, hence not entitled for any relief & the appeal is liable to be dismissed.
8. That the competent authority has dismissed the appellant in accordance with law / rules. Thereafter the appellant preferred an appeal against the said order before the appellate authority i-e Director E & SE KPK, who has converted the penalty of "Dismissal to removal"
9. The appointment of the appellant was illegal ab initio And against the law and rules, hence the authority has conducted the inquiry against the then appointing officer i-e EDO, E & SE, appointed to present appellant in which it was found that the appointed to present appellant



along with the number of other teachers were made against the rules / law and the then EDO, E & SE Mansehra namely Ommer Khan Kundi was removed from Service, by the competent authority i-e chief Minister KPK under E & D rules 2011. **(Copy is attached)**

**FACTUAL OBJECTIONS:**

- 1) Para No.1 is correct to the extent that respondent No.3 announced the post of Qaria in daily "The AAJ" dated 20-5-2011, while rest of the Para is incorrect.
- 2) Para No.2 is subject to proof.
- 3) Para No.3 is incorrect. The appellant was appointed as Qaria in the Education Department through illegal appointment order dated 18-05-2012. (Appeal annexure C)
- 4) Para No.4 is incorrect, hence denied.
- 5) Para No.5 is correct.
- 6) Para No.6 is correct to the extent that the respondent No.3 issued show cause notice to the appellant on the bases of inquiry conducted at high level, in the light of same inquiry the respondent No.3 was directed by the competent authority through letter No. SO(S/M) E&SE D/4-17/2013/ Umar Khan EDO BS-19 Dated Peshawar the August 25, 2014, that further action may be taken in the light of the finding of the inquiry committee after issuance of Show cause notice to the female teachers who were illegally appointed. **(Annexure A)**
- 7) Para No.7 is incorrect as composed the competent authority was not satisfied with the reply of the appellant. As per rejection letter of the appellate authority it is stated that her name was at S. No. 17 of the merit list. Her ETEA application form and other documents are not found. She was appointed as Qaria as vide a general Order Endst: No. 893-942 dated 16/06/2012 at S. NO. 16. **(Annexure B)**  
Appeal may be rejected with the remarks that no documents were provided to the committee neither by the DEO nor by the applicant.
- 8) Para No.8 is incorrect. The respondent No.3 issued Show cause notice to the appellant after completion of high level inquiry, opportunity of personal hearing was given to the appellant which was not availed. Dismissal of the appellant was in accordance with the law / rules.
- 9) The departmental appeal of the appellant rejected by the Director E & SE Peshawar as stated in Para 7.

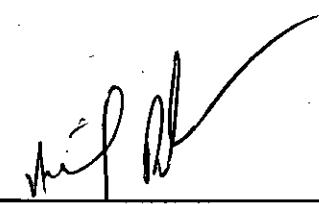
**GROUNDS:-**

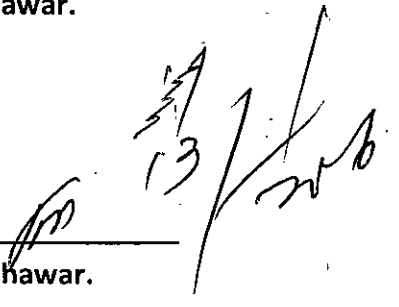
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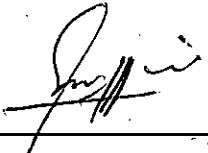
- a. Para No. **a & b** is incorrect, the appointment was not made in accordance with law due to which the dismissal order was issued.
- c. Para No. **c** is incorrect, hence denied. In fact the appointment of the appellant was not made in accordance with law; hence the authority has dismissed the appellant after inquiry.
- d. Para No. **d** is correct to the extent of removal of Ummer Khan Kundi the then EDO rest of the Para is incorrect, hence denied.
- e. Para No. **e** is incorrect. . All the coddle formalities have been fulfilled at the time of dismissal of appellant.
- f. Para No. **f** is incorrect, hence denied.
- g. Para No. **g** is incorrect, hence denied.
- h. Para No. **h** is correct to the extent of removal of Ummer Khan Kundi the then EDO by the Competent authority however the appellant was dismissed after fulfilling all the codal formalities.
- i. Legal, may be treated as per law.

**Prayers:**

It is therefore humbly prayed that the instant appeal may kindly be dismissed.

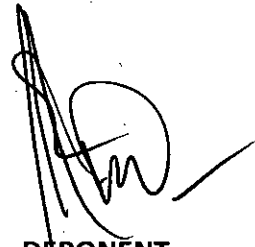
Respondent No. 1   
Director E&SE, KPK, Peshawar.

Respondent No.2   
Secretary E&SE, KPK, Peshawar.

Respondent No. 3   
District Education Officer  
(Female) Mansehra

**AFFIDAVIT**

I, Mr. Sakinullah, ADEO(Litigation), District Education Officer (F) Mansehra, do, hereby solemnly affirm and declared that the contents of reply in the instant Appeal No.778-A/2015 titled case MST: Bushra Khan Qaria Versus Education are correct and true to the best of my knowledge and record and I have concealed nothing as material facts before this Honorable Court.



**DEPONENT**

**BEFORE THE KPK SERVICE TRIBUNAL, CAMP COURT ABBOTTABAD**

5

Mst: Bushra Khan, Qaria, .....APPELLANT

**VERSUS**

Govt. of Khyber Pakhtun Khawa, through Secretary Education,  
Peshawar etc.....Respondents

**SERVICE APPEAL**

**REAPPLICATION IN RESPECT OF SUSPENSION OF OPORTION OF IMPUGNED  
ORDER DATED 03-03-2015.**

**RESPECTFULLY SHEWETH:**

1. The replication may please be considered as integral part of written reply.
2. Para no. 2 is incorrect, hence denied.
3. Para no. 3 in incorrect, hence denied.
4. Para No. 4 is incorrect. The applicant was not entitled for the said post.
5. Para No. 5 is incorrect, hence denied. The appointment of the applicant was against the prescribed rules / policy.
6. The ingredients of suspension are not fulfilled. The dismissal of the appellant was made in accordance with the law by the competent authority.

It is therefore most humbly prayed that the application may graciously be dismissed with cost.

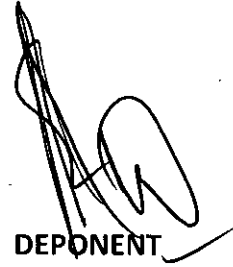
Respondent No. 1 to 3 through  
District Education Officer  
(Female) Mansehra.



**AFFIDAVIT**

6

I, Mr. Sakinullah, ADEO (Litigation), District Education Officer (F) Mansehra, do, hereby solemnly affirm and declared that the contents of replication in the instant Appeal No.778-A/2015 titled case Mst: Bushra Khan, Qaria Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Court.

  
DEPONENT



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the February 27, 2014

7

NOTIFICATION

NO.SO(S/M)E&SED/4-17/2013/Umar Khan DEO:

**WHEREAS** Mr. Umar Khan Ex-Executive

District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) was proceeded against under the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. **AND WHEREAS** inquiry committee was constituted comprising the following officers to conduct formal Inquiry against the accused officer, for the charges leveled against him in accordance with the rules.

- i. Syed Hidayat Jan, (PCS SG BS-20), Special Secretary, Agricultural Department, Khyber Pakhtunkhwa Peshawar (now Secretary Zakat, Usher, and Social Welfare Department.
- ii. Mr. Khallaq Baig Principal BS-20, RITE Male Haripur

3. **AND WHEREAS** the Inquiry committee after having examined the charges, evidence on record and explanation of the accused officer has submitted the report.

4. **AND WHEREAS** a show cause notice was served upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) dated 25-12-2013 circulated to him on 01-01-2014.

5. **AND WHEREAS** the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the Show Cause Notice and personal hearing granted to him by Secretary Establishment Khyber Pakhtunkhwa on behalf of Chief Minister Khyber Pakhtunkhwa on 14-02-2014 at 1100 hours, is of the view that the charges against the accused officer have been proved.

6. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "**Removal from service**" upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) with immediate effect.

SECRETARY

Endst: of Even No. & Date:

Copy forwarded to the: -

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
- 3- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 4- District Education Officer (Male), Mansehra/ Karak.
- 5- Mr. Umar Khan District Education Officer Male (BS-19) District Karak.
- 6- District Accounts Officer Mansehra/ Karak.
- 7- PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 8- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9- PS to Special Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 10- Office order file.

(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No.SO(S/M) E&SED/4-17/2013/Umar Khan EDO BS-19  
Dated Peshawar the August 25, 2014

A<sup>10</sup>

(8)

To.

- i. The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.
- ii. District Education Officer (Female)  
Mansehra.

*Handwritten notes:*  
Note: original report  
file use original report  
put into file  
The case is  
DEO

Subject: - ENQUIRY REGARDING APPOINTMENT/ GUIDANCE.

I am directed to refer to your letter No.3076 dated 16-07-2014 on the subject noted above and to forward herewith a copy of inquiry report conducted by inquiry committee comprising the following officers.

- i. Syed Hidayat Jan, (PCS SG BS-20) Ex-Special Secretary Agriculture Department  
Khyber Pakhtunkhwa Peshawar.
- ii. Mr. Khalaq Baig, Principal (BS-20) RITE Male Haripur.

2. It is requested that further action may be taken in the light of findings of the inquiry committee after issuance of show cause notices to the female teachers who were illegally appointed.

Encl: As Above:

*Signature*  
(MUJEEB-UR-REHMAN)  
SECTION OFFICER (SCHOOLS/MALE)

## INTRODUCTION:

DURING THE YEAR 2012 AND 13 IN OFFICE OF THE EDO, ELEMENTARY AND SECONDARY EDUCATION, DISTRICT MANSEHRA APPOINTMENTS OF FEMALE TEACHERS IN VARIOUS CADRES WERE CARRIED OUT PURSUANT TO AN ADVERTISEMENT PUBLISHED IN DAILY AAJ DATED: 20-05-2011, WHEREIN CERTAIN IRREGULARITIES/ILLEGALITIES IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE WERE NOTED, THEREBY RESULTING IN BREACH OF MERIT/ILLEGAL PRACTICE AND IGNORING THE RIGHTFUL CANDIDATES.

1. The Competent Authority has constituted the enquiry committee, comprising the following officers vide Notification No: SO(S/M)S&SED/4-17/2013 to conduct formal enquiry against Mr. Umar Khan Ex-EDO (E & SE) (BS-19) Mansehra now DEO(M) Haripur and Miss. Shamim Akhtar Deputy DO (E & SE) Mansehra (BS-18) and others for the charges mentioned in the charge sheet and statement of allegations(**Annex-A**)

**SAYED HIDAYAT JAN** (PCS SG BS-20), Special Secretary, Agriculture Department, Khyber-Pakhtunkhwa, Peshawar.

**MUHAMMAD KHALAQ BAIG**, Principal (BS-20) R.I.T.E (M), Haripur.

2. Both the accused officers i.e. Mr. Umar Khan, Ex-DEO (E & SE) , Mansehra and Miss. Shamim Akhtar, Deputy District Officer(E & SE) , Mansehra have been charge sheeted as under:

a. The accused Mr. Umar Khan Ex-DEO (M) (E & SE) Mansehra presently posted as DEO(M) Haripur

- i. That while posted as DEO (M) Mansehra (BS-19) committed the following irregularity (**Annex-I**)

**MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.**

b. Mst. Shamim Akhtar Deputy District Officer (BS-18) Female (E & SE), Mansehra

- i. That while posted as Deputy District Officer (BS-18) (Female) (E & SE), Mansehra, committed the following irregularity (**Annex-II**)

**MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.**

3. **Venue of Enquiry:**

The enquiry was conducted in the office of Dy. DEO (Female) Mansehra.

## **PROCEEDINGS:**

The committee informed both the accused officers vide No. PS/SSA/Enquiry /2013 Dated 6/7/2013. The District Accounts Officer Mansehra was also asked to provide copies of appointment orders of the teachers quoted in subject enquiry (**Annex-III**)

Copies of Charge sheets and Statements of allegations which were already sent to the other officers by the Department were re-submitted to them with the directions to submit their replies in the stipulated time.

The committee visited the office of DEO (Female) Mansehra on 01/8/2013 to conduct enquiry. Mr Umar Khan Ex EDO (E & SE ) Mansehra and Miss Shamim Akhtar Dy. DEO (Female) Mansehra were present alongwith their staff and attended the enquiry proceedings (**Annex-IV**)

*[Signature]*

*[Signature]*



10

8. The Present DEO (M) and Dy. DEO (F) Mansehra were asked to provide all the record /files and other related record mentioned in the letter to the committee on the day of enquiry vide. No: SS (AD) Enquiry/2013 Dated 01/08/2013 (**Annex-V**).

9. The enquiry proceedings continued on daily basis w.e.f 01-08-2013 and on the very second day, one of the accused Mr. Umar Khan, insisted on his designation as recorded in his reply to the Charge sheet/statement of allegations submitted to the committee, claiming that he had not served as DEO (Male) Mansehra during the year 2012 rather he had served as EDO(E & SE)Mansehra. Despite persuasion by the committee regarding factual position of the designation as contained in the Education Department Notification No: SO(S/M E&SED/3-2/2012/Management Cadre dated: 28-12-2012, he was still adamant not to change his stance. (**Annex-V (A)**).

On account of this, the committee immediately informed and requested the Administrative Department for rectification of the designation of the accused as contained in the charge sheet/statement of allegation vide letter No: SS (AD) Enquiry/2013 dated: 02-08-2013 and subsequent reminder of even number dated: 17-08-2013 (**Annex-V(B-C)**) viz a viz reminder to the department from the Chief Minister Secretariat, vide No: SO-1/CMS/KPK/3-1/2013/3514 dated: 27-08-2013 (**Annex-V (D)**).

The proceedings remained continued until the same were adjourned due to falling of Eid-Ul-Fitr Holidays, Independence day, coupled with appearance in the PHC by Chairman of the enquiry committee in an official case and proceedings on leave by most of the concerned staff of the office of DEO(F), Mansehra as well. The same were, however, resumed w.e.f 16-08-2013 and since action on rectification of designation of the accused couldn't be communicated to the committee, therefore, the Administrative Department was again reminded for early needful as well as granting an extension of two weeks vide letter No: SS (AD) Enquiry/2013 dated: 27-08-2013 (**Annex-V (E)**).

The Education Department vide their letter No: SO(S/M)E&SED/4-17/2013/Umer Khan dated: 02-Sept. 2013 intimated that a summary for rectification of the designation of the accused in the charge sheet /statement of allegation was moved to the Chief Minister, Khyber Pakhtunkhwa/Competent Authority. Similarly an extension for further two weeks w.e.f 27-08-2013 was also allowed vide letter quoted *ibid* (**Annex-V (F)**).

## **FACTS**

### **REPLIES TO THE CHARGE SHEET:**

#### **REPLY OF MR UMER KHAN TO THE CHARGE SHEET:**

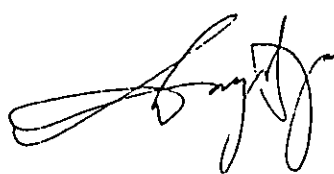
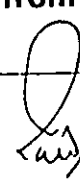
10. Mr. Umar Khan EX- EDO E&SE Mansehra in his reply of charge sheet sent to the committee through registered cover vide NO:7475-76 Dated 27/07/2013 *has taken the stand that he had not served as DEO (M) BS-19 Mansehra during the period 2012 but worked as EDO E&S BS-19 Mansehra w.e.f.01/03/2011/to 31/12/2012*. He added that in the charge sheet it has been recorded that he while posted as DEO(M) BS-19 Mansehra committed the irregularities of making illegal appointments of female teachers during the year 2012 & 2013 in violation of rules and prescribed procedure in District Mansehra whereas he had not worked as DEO Male Mansehra during the said period. He further added that he was neither an authority for appointments for female side nor made even a single appointment of female teacher in capacity of posting as District Education Officer BS-19 (M) Mansehra and hence question of making illegal appointments of CT,DM,PET,AT,QARI, PST(Female) during the year 2012 and 2013 in violation of rules and prescribed procedure does not arise. He requested for the exemption from the charges and with-drawl of charge sheet from him (**Annex-VI**).



Kanwal Khalil Rehman D/O ur	Ahmad Ali	recognized institution but Sanad Qirrat is not from recognized institution.	valid and is against the recruitment rule/policy
Aisha Bano D/O Shahzada	GGHS Baffa	The Sanad issued by Trust Jammiat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment whereas the sanad e Hifz is <u>not from recognized Institution.</u>	The appointment is not valid and is against the recruitment rule/policy
Bushra Bibi D/O Ial Khan	GGHS Sawan Maira	Application form and Sanad is not available on record.	The appointment is not valid and is against the recruitment rule/policy
Mamoona Wajid D/O Wajid	GGHS Ghanool	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Hameeda D/O Mohammad Yousif	GGHS Jared	Sanad Hifz ul Quran is from recognized institution but no Sanad Tajweed is available with the form.	The appointment is not valid and is against the recruitment rule/policy
Tabssum D/O Mohammad Nazir	GGHS Trauura	Sanad Hifz ul Quran is from recognized institution but the Sanad issued by Trust Jammiat Taleemul Quran for teachers of Quran e Kareem (One month Black Board training) is not valid for appointment and Qirrat sand not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Saba Noor D/O S.H Noor Elahi	GGHS Talhata	No relevant Sanad for appointment	The appointment is not valid and is against the recruitment rule/policy
Asma Naz D/O Raja Manzoor Hussain	GGHS Mohayian	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

Only one candidate ~~Amber~~ Zeb D/O Alam Zeb was eligible as per her documents/ sanads

Amber Zeb D/O Alam Zeb	GGHS Phulra	Sanad Hifz ul Quran and Sanad Qirrat is from recognized institution.	Her appointment is valid as per recruitment policy.
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**B**  
**12**

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

**NOTIFICATION.**

WHEREAS, Mst Bushra Bibi, Qaria at Government Girls High School Sawan Maira District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1616-25 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. 17 of the merit list. Her ETEA application form and other documents are not found. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.16.
2. Appeal may be rejected with the remarks that no documents were provided to the committee neither by the DEO nor by the applicant.

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) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Mansehra vide order No. 1616-25 dated 03/03/2015 is hereby converted into removal from service.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4341-46 /F.No. 78 /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. District Accounts Officer Mansehra
3. Head Mistress Concerned.
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

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

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

**NOTIFICATION.**

WHEREAS, Mst. Bushra Bibi, Qaria at Government Girls High School Sawan Maira, District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1616-25 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. 4411-18 dated 22-09-2015 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 hereby appeal of Mst. Bushra Bibi D/O Laal Khan was turned down vide Endst.No.4341-46 dated 25/08/2015 for want of deficiency in the required documents.

AND WHEREAS, she fulfilled the deficiency and her appeals was placed before the appeal scrutiny committee who has recommended that:-

1. Her name was at S.No. 17 of the merit list with a score of 35.22. Both her asnad of Hifzul Quraan and sanad of Tajveed ul quraan are acquired from Darululoom Haqqania Barakaia Lilbanat Jamia Masjid Quba Pulra Mansehra. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.16.
2. Appeal may be accepted subject to condition that the madaris/ institution from where she acquired asnad (Qirat & Hifz 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/ Daruiuloom Swat/ Chitral/ 10 dated 7/6/2012.

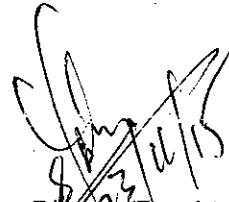
NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1616-25 dated 03/03/2015 and reinstate Ms. Bushra Bibi, Qaria, at Government Girls High School Sawan Maira, District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliations to the DEO (F) Mansehra.

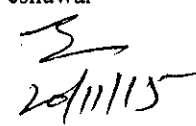
Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 2526-29 /F.No. \_\_\_ /Appeals Female MSR Dated Peshawar the 23/11/2015

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. Bushra 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

  
20/11/15