

18.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that identical service appeals No.758 to 789/2015 have already been admitted to regular hearing and fixed for further proceeding on 20.10.2015.

In view of the above, this appeal is also admitted to regular hearing. 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.

Appellant Deposited  
Security & Process Fee

Chairman  
Camp Court Abbottabad

20.10.2015

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

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

Dismissed as withdrawn.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



Chairman  
Camp Court A/Abad  
20/10/15

ANNOUNCED  
20.10.2015

Form- A  
FORM OF ORDER SHEET

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

Case No. 854/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.07.2015	<p>The appeal of Mst. Ayesha Kanwal resubmitted 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	29-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>18-8-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Aisha Kanwal D/O Khalil-ur-Rehman Qaria GGSS Mairal Amjad Ali Mansehra received to-day i.e. on 10.07.2015 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- ✓ 1- Memorandum of appeal may be got signed by the appellatant.
- ✓ 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Copy of corrigendum letter shown in the index of the appeal at serial no.4 is not attached with the appeal which may be placed on it.
- ✓ 4- Application for suspension of impugned order, is unsigned which may be got signed.
- ✓ 5- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1063 /S.T,

Dt. 10/7 /2015

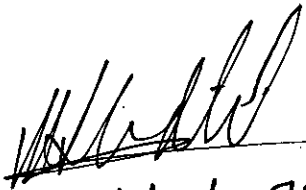
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

A. Abad  
Mr. M.Arshad Khan Tanoli Adv. Mansehra

Re-submission of appeal.

Sir,

The captioned appeal is re-submitted duly rectified. Copy of corrigendum letter mentioned in the index at s no 4 be treated as not annexed. However, the shall be submitted as & when received from the Deptt.

  
16/7/2015

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

Appeal No. 854/2015

Aisha Kanwal D/O Khalil ur Rehman Qaria (GGHS Maira Amjad Ali) R/O Labor Kot 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			1-11
2	Copy of Advertisement	"A"	12
3	Copies of Documents/testimonial are annexed	"B"	13-20
4	Copy of appointment order and corrigendum	"C"	21-23
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	24-25
6	Copy of impugned dismissal order of appellant	"E"	26-30
7	Copy of departmental appeal /representation	"F"	31-34
8	Wakalatnama		

Dated: 8/7/2015

*Aisha Kanwal*  
Appellant

Through

*Muhammad Arshad Khan Tanoli*  
**Muhammad Arshad Khan Tanoli**

Advocate, High Court

Abbottabad

(1)

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

Appeal no. 854/2015

H.W.P. Province  
Service Tribunal

Diary No. 821

Dated 10-7-2015

Aisha Kanwal D/O Khalil ur Rehman Qaria (GGHS Maira Amjad  
Ali) R/O Labor Kot 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:-

Filed to the  
Registrar  
20/7/15

re-submitted to-day  
and filed.

Registrar  
28/7/15

(2)

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"**
  
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.

(3)

5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1565-74/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 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 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 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

(4)

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 required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1565-74/AE-J/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 12.3.2015. Copy of departmental appeal /representation is attached as annexure "F" but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-



## GROUND

(5)

- 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. 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 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 removal of Umar Kundi from service, the appellant 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


(8)

dismissal order endrst. No 1565-74/AE-J/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: 8/7/2015

  
Appellant

Through

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

(9)

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

Aisha Kanwal D/O Khalil ur Rehman Qaria (GGHS Maira Amjad  
Ali) R/O Labor Kot 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 1565-**  
**74/AE-J/ESTB 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.

14

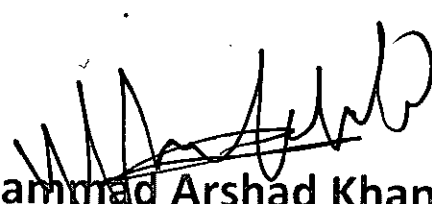
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the applicant has not been contested by any one as there was no contesting rival candidate.
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

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

Dated: 8/7/2015

  
Appellant

Through

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

(11)

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

Aisha Kanwal D/O Khalil ur Rehman Qaria (GGHS Maira Amjad Ali) R/O Labor Kot 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, Aisha Kanwal D/O Khalil ur Rehman Qaria (GGHS Maira Amjad Ali) R/O Labor Kot 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: 8/7 /2015

  
Deponent







Anney B,

P 13



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

070363

# شهادة حفظ القرآن الكريم



الحمد لله رب العالمين، والصلاة والسلام على خاتم النبيين، سيدنا محمد وعلى آله وصحبه أجمعين، وبعد :  
تشهد رئاسة فريق التقييم (التقييم) باكستان، بأن الطالبة عائشه كنول بنت خليل الرحمان من مانسهره المولودة 08-12-1991 ء قد حفظت القرآن الكريم كاملاً بظهور الغيب مع التجويد في جامعته ام سلمه مانسهره عام 2004 هـ ونجحت في اختبار الحفظ المنعقد تحت إشراف وفاق المدارس العربية، بتقدير مقبول وبإني على ذلك قر مجلس الوفاق منحها شهادة حفظ القرآن الكريم ورئيس الوفاق اذ يمنحها هذه الشهادة يوصيها بتقوى الله عز وجل، وأن تتعاهد لقران الكريم بتلاوته اثناء الليل واطراف نهاره وان تعمل بتعاليمه السامحة، وأن تعلمه غيرها، والله الموفق :



الإمام

خليل

الإمام

الإمام

Muham

الشاريح 1-12-1991 ء

47

محل الإصدار: (التقييم) باكستان

رقم التسجيل 1626569

324771

رقم الشهادة

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## PROVISIONAL RESULT CARD



Serial No. 640874

Name: AYESHA KANWAL  
 Father's Name: KHALIL UR REHMAN  
 Address: VPO LABERKOT

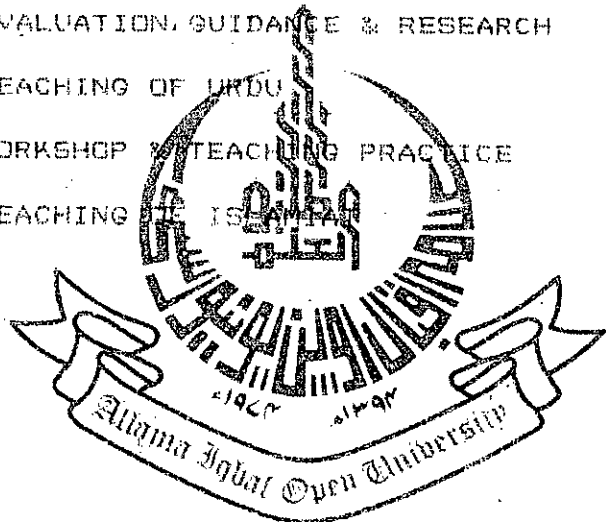
Roll No. AW625419  
 Registration No. 13NMA03466  
 Final Semester SPR-2014

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

9-14

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 13	0513	SCHOOL ORGANIZATION	100	66
AUT- 13	0451	ENGLISH (COMPULSORY)	100	71
AUT- 13	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	57
AUT- 13	0512	PERSPECTIVES OF EDUCATION	100	52
AUT- 13	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	63
AUT- 13	0514	EVALUATION, GUIDANCE & RESEARCH	100	54
SPR- 14	0658	TEACHING OF URDU	100	65
SPR- 14	0655	WORKSHOP & TEACHING PRACTICE	100	66
SPR- 14	0654	TEACHING ISLAMIC	100	56



Attested

Muhammad Khalid Khan  
 Distt: Courts Abdolmalik

CREDITS: 6

Total Marks / Obtained

900 / 550

Result Declared on JANUARY 16, 2015

Percentage / Grade

61 B

Date of issue JANUARY 20, 2015

**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**



# HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

## DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2013

P-15

Roll No: 23603

Reg No: 11-MSRG/11-362

Name: Ayesha Kanwal

F/ Name: Khalil Ur Rehman

Institution/ GOVT. GIRLS DEGREE COLLEGE NO.2

Part: Second

District MANSEHRA

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks----->	285				151	ONE HUNDRED FIFTY-ONE	
ENGLISH	75		32		32	THIRTY-TWO	Pass
PAKISTAN STUDIES	40		26		26	TWENTY-SIX	Pass
ISLAMIC STUDIES	75		28		28	TWENTY-EIGHT	Pass
			25		25	TWENTY-FIVE	
<b>Total:</b>	<b>550</b>				<b>262</b>	<b>TWO HUNDRED SIXTY-TWO</b>	

Percentage: **47.64**  
Division: **SECOND**

Print Date: 31-08-2013

Checked By: \_\_\_\_\_

Errors and omissions are subject to subsequent rectification.  
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations

Hazara University, Mansehra

August 31, 2013

Attested

*[Signature]*

Distt: Courts Abbottabad

Certificate No: AB 258805

P-16

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD**



Roll No: 52729  
Group: HUMANITIES

**HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION  
DETAILED MARKS CERTIFICATE**

**Part - II**  
**Session: 2010 (Annual)**

Name: AYESHA KANWAL  
Father Name: KHALIL UR REHMAN  
Reg No: 0085211153  
Institution/  
District: GOVT. GIRLS DEGREE COLLEGE 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	39	--	28	--	67	Sixty-Seven
Urdu (Comp)	200	56	--	53	--	109	One Hundred Nine
Islamic Education	50	32	--	--	--	32	Thirty-Two
Pakistan Studies	50	--	--	28	--	28	Twenty-Eight
Economics	200	39	--	45	--	84	Eighty-Four
Islamic Studies	200	45	--	56	--	101	One Hundred One
Health & Physical Edu	200	42	13	51	12	118	One Hundred Eighteen
<b>Total : 1100</b>						539-D	Five Hundred Thirty-Nine Only
						Remarks :	


Date : 23 July, 2010

Checked By : 2

  
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](http://www.biseatd.edu.pk)

*Attested*

  
Advocate  
District: Abbottabad

Certificate No: AB 88975**R-17****BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD**Roll No: 61226  
Group: HUMANITIES

**DETAILED MARKS CERTIFICATE**  
**SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
**Session: 2008 (Annual)**

Name: AYESHA KANWAL  
 Father Name: KHALIL UR REHMAN  
 Reg. No: 0065592017  
 Institution / District: GG CENTENNIAL MODEL SCHOOL MANSEHRA

has secured the marks shown against each subject in the Secondary School Certificate Examination held in the month of April / May as a Regular candidate.

Subjects	Total Marks			Marks Obtained		Total	Marks in Words
				Theory / A	Pract / B		
English	75	75	150	50	42	92	Ninety-Two
Urdu	75	75	150	48	55	103	One Hundred Three
Islamiyat	75		75	49		49	Forty-Nine
Pakistan Studies	75		75	45		45	Forty-Five
Mathematics	75	75	150	60	50	110	One Hundred Ten
General Science	100		100	68		68	Sixty-Eight
Islamic Studies	100		100	51		51	Fifty-One
Manage: For Better Home	100		100	61		61	Sixty-One

Total : 900

579-B Five Hundred Seventy-Nine Only

Remarks

Dated: 16-JUL-08

Checked By: \_\_\_\_\_

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

Controller of Examinations

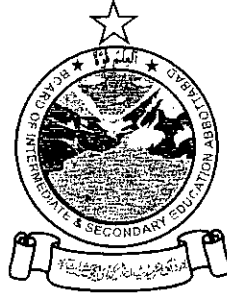
Attested,  
 Muhammad Khair Khan  
 Controller of Examinations  
 Abbottabad

P-18

ADA 252247

Roll No. 61226

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**Abbottabad N.W.F.P. - Pakistan**  
**SECONDARY SCHOOL EXAMINATION CERTIFICATE**  
**SESSION ANNUAL 2008**

This is to certify that AYESHA KANWAL

Daughter of KHALIL UR REHMAN

A candidate from GG CENTENNIAL MODEL SCHOOL MANSEHRA

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in April/May, 2008 as a regular candidate. She has obtained 579 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.ISL-EDUCATION           |
| 4.PAK STUDIES     | 5.MATHS | 6.GENERAL SCIENCE         |
| 7.ISLAMIC STUDIES |         | 8.MANAGE: FOR BETTER HOME |

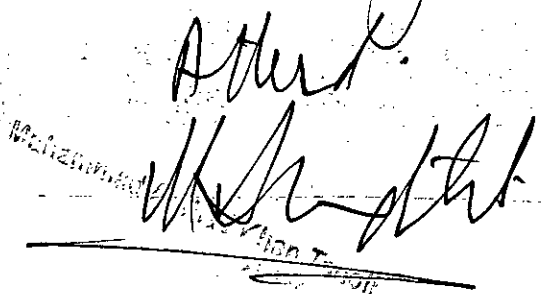
Date of Birth according to admission form is EIGHTH DECEMBER

One Thousand Nine Hundred and NINETY-ONE ( 08-12-1991 )

  
Asstt. Secretary

This certificate is issued without alteration or erasure.

  
Secretary



DOMICILE CERTIFICATE  
NORTH WEST FRONTIER PROVINCE

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

P-19

I belonged by birth to Village LABARKOT Tehsil & District MANSEHRA.

*Aijesh Kanwal*  
SIGNATURE OF THE APPLICANT

Dated: 20-08-2004

Pursuance to the declaration dated 20-08-2004

filed by Mrs. AISHA KANWAL D/o KHALIL-UR-REHMAN hereby certified that the said Mrs. AISHA KANWAL is born of parents who are permanent residents of the NWFP, having belonged to it by birth / settled in it.

I have satisfied my self from personal / my knowledge verification that the above declaration is true and certify.

This \_\_\_\_\_ day of \_\_\_\_\_ 2004

COUNTERSIGNED

10535

21/8/04

DEPUTY DISTRICT OFFICER REVENUE  
MANSEHRA

DISTRICT REVENUE OFFICER  
MANSEHRA

*Attested*

*Muhammad Aisha*  
Distt. Manshera

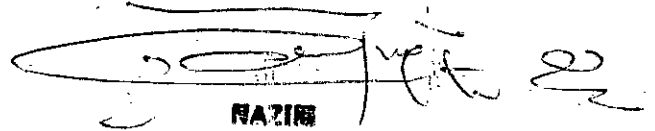
PEARL Computer Composing Point  
COURT ROAD NEAR POLICE STATION MANSEHRA.

۲۷-۲

میں پیدہ ہو کر گورنمنٹ کالج پرائمری سکول اس بات کی تصدیق کرتی ہیں  
کہ سائنس کنول دفتر ذلیل الرحمن سرائے پبلوٹ کے جماعت پنجم  
کا امتحان گورنمنٹ کالج پرائمری سکول پبلوٹ سے پاس کیا۔

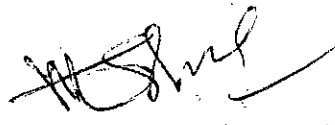
Head Address  
Govt. Girls Primary School  
Laharkot (Mansobra)

لہذا یہی ثابت ہے کہ عائشہ کنول دفتر ذلیل الرحمن سرائے پبلوٹ  
سے موضع لہارکوٹ تحصیل و ضلع ساہیوال میں پیدہ ہوئی

  
NAZIR  
Union Council  
Laharkot Mansobra.

صاحب  
صاحب ذلیل الرحمن صاحب ناظم لہارکوٹ کے ساتھ عائشہ کنول دفتر ذلیل الرحمن سرائے پبلوٹ  
میں پیدہ ہوئی اور اس کے والدین عوسر پبلوٹ اور لہارکوٹ کے باشندے ہیں۔

صاحب  
۱۹۸۱  
۱۹۸۳  
۲۱/۵۸  
۲۶



21-8-84



Annex "C"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

P-22

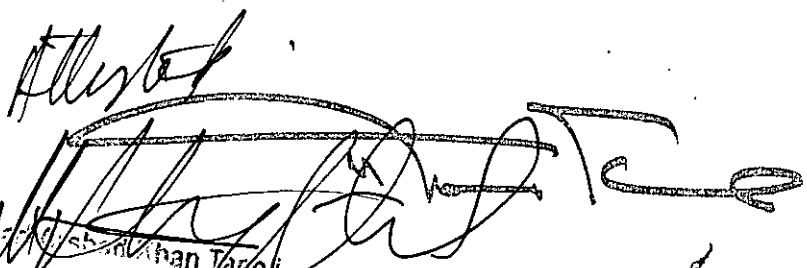
As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following Qaria teachers (Female) against vacant posts mentioned against each in BPS-9 @ Rs.6200-380-17600 pm plus usual allowances as admissible under the rules in the interest of Public Service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

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

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

TERMS & CONDITIONS:

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

Attested  
  
 Muhammad Hashim Khan  
 District Courts Administration

- 1-23
4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
  5. They will submit to this office, their all testimonial/Registration copy of their Madrasa (Institutions), along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
  6. The release of the pay by the concerned DDOs will be subject to the (a) receipt of verified documents by the appointing authority / (EDO E&SE 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 DIQ 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 pervious shall be entitled for pension / gratuity etc.
  13. No. TA/DA etc is allowed.
  14. Charge report should be submitted to all concerned in duplicate.

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

Endst: No 893-942 /Estt: (F)Apptt: Qaria (F)/2012 Dated Mansehra the 16/07/2012  
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.

  
EXECUTIVE DISTRICT OFFICER,  
E&S EDU: MANSEHRA

Distt. Court Abbottabad



Annex "D"

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

No. 7740 / Establishment/ 2014

Email: deofmanshra@yahoo.com

Phone & Fax: 0997-302518

Dated: 29/9/ / 2014

P-25

**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 Aysha Kanwal D/O Khalil Ur Rehman Qaria, Govt: Girls High School Maira Amjid Ali Mansehra, Show cause Notice as follows:

1) You were appointed as Qaria at GGHS-Maira Amjid Ali, 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.

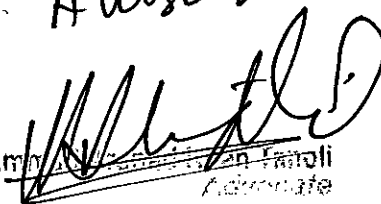
- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- b) Inflected huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. 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.

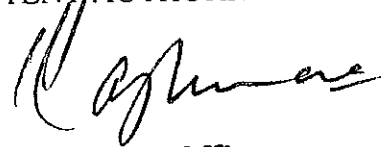
4) You, are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.

5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.

6) A copy of the finding inquiry committee related page is enclosed.

*A. Ustob*  
  
 Muhammad Anwar Farooq  
 Advocate  
 Abbottabad

COMPETENT AUTHORITY

  
 District Education Officer  
 (Female) Mansehra

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To

25-A

Attested

The office of the District Education officer (Female) Manselhra.

Mrs. Arshad Khan  
Distt. Courts Manselhra

Reply to showcause notice no 7740 establishment  
2014 dated 29/09/2014

It is stated that reply to notice issued by Naghmans Sardar District education officer (Female) Manselhra. That Aysha Kanwal D/O Khalil ur. Rehman working on post of Garis at GGHS Main Amjad Ali Manselhra was appointed wrongly is paraswisely as under.

1) Reply to para 1 is that I was appointed on the post of Garis at GGHS at Main Amjad Ali through endstt: No 893.942/estt Garis (F)/2012 dated 16/06/2012. As far as the EDO (EsSE) is concerned he was by that time EDO (EsSE) appointed by high officials in Education department through legal procedure. Later on if he were declared defunct due to whatever reasons it was none of my concern but a withdrawing matter for government & Education department. I followed all procedure for appointment legally and I have not committed any misconduct in this regard of EDO was wrong. The education department should have "nipped the evil at the bud" but the very department kept mum, this is shange, alarming and equivalent to causing irreparable loss to me and to all those who were appointed for the very reason we all reserve the right to go to court for redressal of wrong.

2) I have shown no defiance from the enquiry committee, whatever its recommendations are, but subject to proof

1-29-25-13

a) I have shown no misconduct and dishonesty in my appointment because it was legal according to all rules and regulations. It was made by concerned authority in his official capacity as representative of Education department and not in his personal capacity through proper advertisement by Umar Khan Kundi EDO (E & SE) Manselhra. Where posts of CT General, PET, TT, Qaria, DM, AT and PST were announced. Where ETEA forms applications were invited before 06/06/2011 with full documents for this purpose I submitted Rs 400 through National Bank of Pakistan (Main Branch Manselhra) by draft No 0593574 on 28/05/2011 in name of Director ETEA Pakistan (the copy of draft is attached) then according to advertisement test was held on 26/06/2011 at Thakra Cricket Stadium Manselhra at about 2:00 o'clock. At the spot about 3000 to 4000 candidates in the test there. At this very place ETEA test was also held at morning time where also 3000 to 4000 <sup>candidates</sup> appeared. In the test I acquired 164 marks out of 300. Later on after almost a week interview was conducted at GGHSS NO Manselhra. Final merit list after approval by the departmental selection committee was issued through order No 813-942/ESS1 (F) Apptt Qaria (F)/2012 dated 16/06/2012. According to it was decided that pay of such selected candidates will be effective from 01/09/2012 after re-opening of summer vacations (the copy of selection order is attached). From the above mentioned facts it is very much clear as a broad day light that appointments were made according to legal procedure

Muhammad  
Distt: Courts Abbottabad

P. 28 DS-C

to legal procedure for selection through ETEA.

- b) In scenario of present above mentioned conditions it is clear that I was not appointed as a bogus candidate so how could I have inflicted losses to Government Treasury, so I have committed no illegality in getting my legal and due pays of my services which I rendered honestly in the Education department.
- c) I have not snatched rights of other candidates because I am myself a deserving candidate and have not cheated the Education department in collaboration with EDO.
- 3) You have no solid grounds of my fault and competency to dismiss me from job as I was appointed legally and according to rules and regulations of ETEA by applying rule 4 of Khyber Pakhtunkhwa servant (Efficiency and discipline) rule 2011.
- 4) I have shown all details due to which I do not fall in that bogus appointment category so aforesaid penalty should not be imposed upon me.
- 5) I am availing this by replying to this show cause notice within time because I received it at 24/11/2014.
- 6) Findings of inquiry committee are wrong because objection raised against me is that Sanad A'irrat is not from a recognized institution, the fact is this that it is from the recognized institution approved from Wafaqul Madaris, this sanad is moreover verified at its back as well. The confusion is that it is Sanad collectively of Hifz as well as Tajweed (A'irrat). As it is evident from Sanad itself (The

A. Kher  
Advocate  
Distt. Courts Abbottabad

P-29

From earlier parasise reply to your show cause notice and above discussion it is very much clear that the allegations against my appointment should be discharged. I should be given chance to render my services on the basis of my due appointment in your department

Thanks

Your obedient, Aysha Kanwal

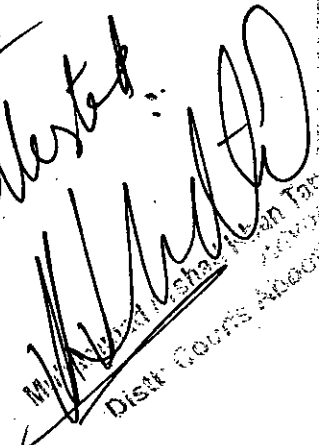
Aysha Kanwal

CNIC = 13503-5662392-8

Qaria GHS Mains Anjad AP,  
Mansehra

Cell # 0331-9343851

Dated 06/11/14

Attested:  
  
Mr. Abdul Wahid Khan  
Dist. Courts Secretary

1-25

D/O Ahmad Ali	GGHS Maira	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
Sana Saffa	GGHS Saffa	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 not from recognized Institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Sajid 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
D/O Ghanool	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
D/O Mhammad	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
D/O Mhammad	GGHS Trabura	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
D/O Noor S.H. Noor Elahi	GGHS Talhata	No relevant Sanad for appointment	The appointment is not valid and is against the recruitment rule/policy
D/O Naz Raja 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.
------------------------	-------------	--	---

Amber Zeb





Annex "E",

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

1-26

1- Where as Mst: Aysha Kameel D/O Khaliq-ur-Rahman working as CGHS/GGMS/GGP M.A. Ali 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) Agriculture 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 applying in accordance to Show Cause Notice, in the view of all 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. Aysha Kameel D/O Khaliq-ur-Rahman CGHS/GGMS/GGP M.A. Ali

*(Signature)*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

B

Endst: No. 1565-74 /AE- 3 /Etab: dated 03 /07 /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. Vist: \_\_\_\_\_
- 10. Office File.

Attested

*(Signature)*  
Dist: Courts Abbottabad

*(Signature)*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

B

The Director Education Khyber Pakhtunkhwa

Subject: Departmental Appeal for restoring the original position of QTRIA and cancelling the order of dismissal by DEO Rawala Mandi through letter endorsement no 1565-74 dated 03/03/2015

Respectfully sheweth!

1) It is stated that I was not wrongly appointed. I have already mentioned in reply to show cause notice I was appointed on the part of QARRA at GGHS at Mairi Anyar Ali through endstt: no 893-942/estt QARRA (F) / 212 dated 16/06/2012. I was appointed through representative of education department I have not shown any misconduct. It was upon Education department to keep check upon such people so the department is liable if I suffer any irreparable loss.

Whatever the recommendations of this committee are not real and not based upon true factual position because all the allegations are subject to proof and none are yet proved.

Attested

*[Signature]*

2) The posts were properly announced through newspapers by various Khuzdud EDO (E & Sec) Mandi by their advertisement posts of PET, CT General, TT, QARRA DM, AT and PST were announced. ETEA forms applications were invited before 6/6/2011.

I submitted Rs 400 through NBP (main branch) Manches  
by draft no 0593574 on 28/05/2011 in name of direct  
ETEA peshawar. (the copy of draft is attached)

2% then according to advertisement test was held on 26/06  
at Chakera cricket stadium where I secured 164 marks  
out of 300 hundred. ~~Afterwards~~ later on interview in  
G.B.I.T.S.S no was held. After approval by departmental  
selection committee final merit list was issued through  
end no 813-942/ESST(F) Apptt Qanra(F) 2012 dated  
16/06/2012. According to this list it was made sure  
that their jobs will commence from 1/07/2012.  
Above facts make it clear that I did not illegally and  
misconduct in my appointment and wholly (fully) followed  
legal procedure for selection through ETEA.

4) I have not done any illegality so my selection was  
according to rules and regulations so I may not be dismissed  
from the job because I don't deserve such major  
penalty on my legal and proper appointment.

5) Moreover the education department have no solid grounds  
of my fault and competency to dismiss from my job as  
I was appointed legally and according to rules and  
regulations of ETEA by applying rule 4 of Khyber Pakhtun  
khwa servant (Efficiency and discipline) Rule 2011.

6) Moreover findings of inquiry committee are wrong because  
objection raised against me is that Sanad Qanra is not  
from a recognized institution. In reality fact is this  
it is from recognized institution approved from Wafaqul

cell # 03319343861

Manshin

Office at 6th 5th Ave Road 22  
13503-562292-8

Ms. Agatha Kwan

Sham

12/3/15

Mohel  
District  
Municipal  
Canteen  
Kowloon  
Kowloon  
Kowloon

of 15 family requested that I may not be  
deprived from my and mother's money  
be passed over to my and mother's money  
order should be cancelled.

and support of my family.  
mother suffer because I am  
fact may come out. It may not make my widow  
and any property in my part would suffer me  
Dismembering me from my right of sense is also  
against constitution of Pakistan. and having no mistake

as imposed penalty of dismembered on the basis of  
is proved to be illegal, against fact and against the law.  
confusion is that it is proved used by Rafiqul Madani  
this demand is moreover verified as to be as well. The  
not recognized for using my demand.

also have demand from such institutions for 8 or 10 years.  
and many A.T.s are not working at different schools who  
Madani. which is recognized by government of Pakistan

P. 25

3

P-35

LEOPARDS COURIER SERVICES PVT. LTD.

57640819

12



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Phone: *110*

From: *Myra*

Phone: *110*

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قول نہیں کرتا۔ اگر آپ کے لئے کوئی ایسی کوئی چیز ہے جو  
معاوضے کی ذمہ داری نہیں ہے۔

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*Attended*

Muhammad Arif Anwar Tanoli

*[Signature]*



قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت KPK سرکل سٹریٹ اور  
عنوان: عائشہ بیگم بنام گورنمنٹ آف پاکستان  
منجانب: اسمیت  
نوعیت مقدمہ: اسمیت

## باعث تحریر آئندہ

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

جمہا ریشہ خان بیگم کے ساتھ

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

المرقوم: ۵/۷

بمقام: ایب آئی بی

M. Arshad Khan Tanzeel  
Adv High Court Ad

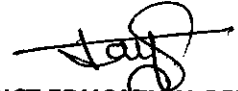
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

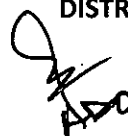
Service Appeal No. 855/2015 /

Respectfully Shewth

1. That the services appeal No: 855/2015 in respect of MST: Aisha Kanwā is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4212-17 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qāriā (Notification attached).

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

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA





DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS Mst. Ashia Kanwal, Qaria at Government Girls High School Maira Amjad Ali District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1565-74 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. 14 of the merit list. Her both asnad of Hifzul Quraan and sanad of Tajveedulquraan are from Jamiaa Umm e Salma Lel Banat ul Islam Labor kot Mansehra. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.13.
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/ Darululoom Swat/ Chitral/ 10 dated 7/6/2012.

NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1565-74 dated 03/03/2015 and reinstate Ms. Aisha Kanwal, Qaria, at Government Girls High School Maira Amjad Ali District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

42.12.17  
Endst: No. \_\_\_/F.No. 74/Appeals Female MSR Dated Peshawar the 25/6/2015

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. Aisha Kanwal, 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