

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant and was serving as such when dismissed from service vide impugned order dated 3.3.2015 on the allegations of procuring illegal appointment regarding which she preferred departmental on 21.3.2015 which was not responded and hence the instant service appeal on 6.7.2015.

That the appellant was appointed in the prescribed manners and that no inquiry whatsoever was conducted in the prescribed manners and as such the impugned order is a nullity in the eye of 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.

Appellant Deposited
Security & Process Fee



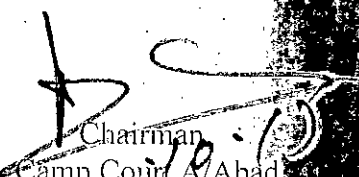

Chairman
Camp Court A/Abad

20.10.2015

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

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

Dismissed as withdrawn.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


Chairman
Camp Court A/Abad
20/10/15

ANNOUNCED
20.10.2015

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 749 /2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06.07.2015	<p>The appeal of Mst. Hameeda Yousaf presented today by Mr. Abdul Saboor Khan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"><i>[Signature]</i> 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;"><i>[Signature]</i> CHAIRMAN</p>

BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR

Appeal No. 749/2015
Mst. Hameeda YousafAppellant

VERSUS

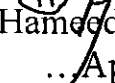
Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar etc.....Respondents

SERVICE APPEAL

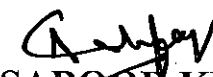
INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of service appeal alongwith affidavit.	1-7
2	Application for status-quo.	8-9
3	Correct addresses of the parties.	10
4	Copies of educational record.	"A"	11-16
5	Copy of the advertisement.	"B"	17
6	Copies of E.T.A Test result.	"C"	18
7	Copy of the appointment order.	"D"	19-20
8	Copy of the Pay roll slip.	"E"	21
9	Copy of the show cause notice.	"F"	22-22-A
10	Copy of the impugned order dated 03.03.2015.	"G"	23
11	Copy of the Departmental appeal.	"H"	24-26
12	Copy of the receipt.	"I"	27
14	Copy of the correspondence dated 15.08.2003.	"J"	28
15	Wakalat Nama.	29

Dated 01.07.2015


Mst. Hameeda Yousaf
...Appellant

Through


ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.

P-①

**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Appeal No. 749/2015

Mst. Hameeda Yousaf daughter of Muhammad Yousaf caste Gujjar resident of Bandi Khankhel Matserian, Tehsil and District Mansehra Ex-Qaria Government High Trappi, Tehsil and District Mansehra.....Appellant

VERSUS

**P.W.F. PROVINCE
Service Tribunal**

Diary No. 765

Dated 6-7-2015

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Peshawar.
2. Director Education Department, Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE) Education Mansehra.
4. District Accounts Officer, MansehraRespondents.

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1973 AGAINST THE
ORDER ENDST NO.1606-15/ESTAB DATED
03.03.2015 VIDE WHICH THE APPELLANT
WAS DISMISSED FROM SERVICE.**

PRAYER: -

On acceptance of instant appeal, the impugned order dated 03.03.2015 may please be set aside and the appellant may graciously be re-instated in service with all back benefits.

6/7/15

Respectfully Sheweth!

1. That, the appellant is resident of village Bandi Khankhel Matserian, Tehsil and District Mansehra.

2. That the appellant is fully qualified and having the required documents/certificates.

(Copies of educational record are annexed as annexure "A").

3. That, the District Education Officer, Mansehra/respondent No.3 advertised some vacancies in Daily Mashriq.

(Copy of the advertisement is annexed as annexure "B").

4. That, as per procedure, the appellant applied for the post of Qari being a qualified teacher having Hifz-o-Tajweed certificate with Alia, F.A and E.T.A test was conducted on 26.02.2011 and the appellant appeared as a candidate and obtained 124 marks out of 300 under roll No.1700200.

(Copies of E.T.A Test result is annexed as annexure "C").

5. That, the then E.D.O conducted interview and scrutinize the documents

of the candidates, and merit list of the candidates was displayed for receiving objections. After due official process, the meeting of D.S.C was held and approved the case of Qaria candidates for appointment against the vacant post of Qaria and the appointment order of the appellant was issued under Endst. No.893-942 dated 16.06.2012 and the appellant was posted at GGHS Jared and after 01 year, she was transferred from GGHS Jared to GGHS Trappi.

(Copy of the appointment order is annexed as annexure "D").

6. That, the appellant performed her duties very honestly, regularly and fairly since the time of her appointment in above-mentioned different schools and also paid her salaries for 02 years 11 months and 14 days.

(Copy of the Pay roll slip is annexed as annexure "E").

7. That, the appellant was continuously performing her duties without any break for the period for which the salaries were received and has never been found guilty of any kind of absenteeism, truancy, misconduct, misfeasance,

malfeasance or nonfeasance, nor been found guilty of dereliction of duty. Without taking these things into consideration, the respondent No.3 issued show-cause notice to the appellant levelling baseless allegations against the appellant therein.

(Copy of the show cause notice is annexed as annexure "F").

8. That, reply to the notice was submitted.
9. That, the appellant appointment was terminated through impugned dismissal order dated 03.03.2015 by imposing major penalty of dismissal from service.

(Copy of the impugned order dated 03.03.2015 is annexed as annexure "G").

10. That, being aggrieved from the impugned dismissal order, the appellant preferred departmental appeal before the Director (Elementary & Secondary) Education Peshawar but of no avail.

(Copy of the departmental appeal and receipt thereof are annexed as annexure "H & I").

11. That, the services of the appellant have been terminated/dismissed alleging that the appellant has received her Education from an institution which is

not affiliated with a recognized institution for the purpose of affiliation. This fact of allegation is belied from the fact that the Parent Institution from which the appellant got her education is duly affiliation with Jamia Taleemat Islamic Faisalabad.

(Copy of the correspondence dated 15.08.2003 is annexed as annexure "J").

12. That, the appellant being aggrieved from the impugned order, seeks the gracious indulgence of this Honourable Court/tribunal, inter alia, on the following amongst the other grounds: -

GROUNDS

- i. That, the impugned order dated 03.03.2015 is wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, without lawful authority, based on malafide, un-constitutional and against the relevant rules and regulations hence not maintainable and liable to be set aside.
- ii. That, the services of the appellant have been terminated without fulfilling the

basic principles of natural justice which are impliedly embedded in the service law which are that the fact upon which the services of the appellant have been terminated has not been probed into because no inquiry has been made into the affiliation of the institution from which the appellant got her education; and by also ignoring the correspondence preferred before the respondent No.3 which definitely belies the allegation levelled against the appellant.

- iii. That, there is no case of ill-gotten means against the appellant and section-20 of General Clauses Act is not applicable to the case of the appellant because appellant has not been found guilty of any misconduct or procuring her services through any fraudulent means.
- iv. That, in the light of authoritative decisions/view of the superior judiciary including the Supreme Court of Pakistan, the services of the appellant could not have been terminated and the impugned order/notification could not have been issued because where the authority is guilty of irregularities, illegalities and procedural violations, the services of an employee cannot be terminated.


v. That, no opportunity of personal hearing has been given to the appellant and her services have been struck through a single stroke of pen. Thus the impugned order is also against the principal of natural justice that no one should be condemned unheard.

It is, therefore, most humbly prayed that on acceptance of instant appeal, the impugned order dated 03.03.2015 passed by the respondent No.3 may please be set aside and the appellant may graciously be reinstated in service with all back benefits.

Dated 01.07.2015


Mst. Hameeda Yousaf
Appellant

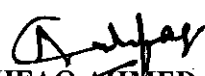
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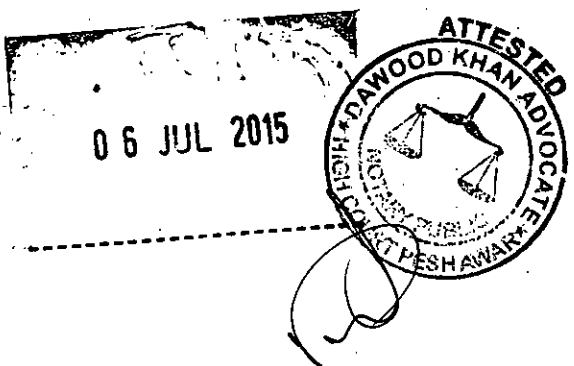

ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.

AFFIDAVIT

I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 01.07.2015


MALIK ASHFAQ AHMED JILANI,
Advocate High court,
Mansehra.



**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Mst. Hameeda YousafAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar etc.....Respondents

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF
OPERATION OF IMPUGNED ORDER
DATED 03.03.2015 TILL THE DISPOSAL
OF ABOVE-TITLED APPEAL.**

Respectfully Sheweth!

1. That, this application may please be considered as part and parcel of main appeal.
2. That, the appellant have a prima facie case and there is every hope of its success.
3. That, the balance of convenience also tilts in favour of the appellant.
4. That, if the operation of the impugned order dated 03.03.2015 has not been suspended then the appellant would suffer an irreparable loss and purpose of above appeal would become infructuous.

It is, therefore, most humbly requested that the operation of the impugned order dated 03.03.2015 may please be suspended till the disposal of main appeal.

Dated 01.07.2015

(Signature)
Mst. Hameeda Yousaf
...Appellant

Through

(Signature)
ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.

AFFIDAVIT

I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 01.07.2015

(Signature)
MALIK ASHFAQ AHMED JILANI,
Advocate High court,
Mansehra.

06 JUL 2015
ATTESTED
ABDUL SABOOR KHAN, ADVOCATE
(Signature)

**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Mst. Hameeda YousafAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar etc.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Mst. Hameeda Yousaf daughter of Muhammad
Yousaf caste Gujjar resident of Bandi Khankhel
Matserian, Tehsil and District Mansehra Ex-
Qaria Government High Trappi, Tehsil and
District Mansehra.

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar.
2. Director Education Department, Khyber
Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE)
Education Mansehra.
4. District Accounts Officer, Mansehra.

Dated 01.07.2015

Mst. Hameeda Yousaf
...Appellant

Through

**ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.**

ADA No 209926 ADDITIONAL SUBJECTS

Roll No. 30847

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2006

This is to certify that HAMEEDA YOUSAF
Son / Daughter of MUHAMMAD YOUSAF
a candidate from ABBOTTABAD DISTRICT

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in SEPT 2006 as a private candidate. He / She obtained 182 marks out of 375.

The candidate passed in the following subjects:

- 1. ENGLISH 2. URDU 3. PAK-STUDIES

Date of Birth according to admission form is TWENTIETH OF JUNE

One Thousand Nine Hundred and EIGHTY SEVEN (20-6-1987)

Attested
[Signature]

[Signature]
Asstt. Secretary

This certificate is issued without alteration or erasure.

[Signature]
Secretary

113899

P-12

Certificate No: AB _____

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABADRoll No: 30847Group: HUMANITIES

DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
(CLASS X)
Session: 2006 (Annual)

Name : HAMEEDA YOUSAF
 Father Name : MUHAMMAD YOUSAF
 Institution / District : ABBOTTABAD DISTRICT

has secured the marks shown against each subject in the Secondary School Certificate Examination Part - II (Class 10) held in the month of Sept/Oct. as a Private candidate.

Subjects	Total Marks		Part-I		Part-II		Total	Marks in Words
			Th	Pract	Th	Pract		
English	75	150	27	--	27	--	54	Fifty-Four
Urdu	75	150	45	--	49	--	94	Ninety-Four
Pakistan Studies	75	75	--	--	34	--	34	Thirty-Four

Total: 375


182- One Hundred Eighty-Two Only

Dated: 22-JAN-08

Remarks :

Additional Subject

Checked By: _____


 Controller of Examinations

Attested
 Rashid

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: www.biseatd.edu.pk

Certificate No: AB 247811

P-13

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 69308

Group: HUMANITIES

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION
DETAILED MARKS CERTIFICATE

Part - II
Session: 2010 (Annual)

Name: HAMEEDA YOUSAF
Father Name: MUHAMMAD YOUSAF
Reg No: 1630AB/AD-intFP07
Institution/
District: ABBOTTABAD

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 Private Candidate.

Subjects	Marks	Marks Obtained					Marks in Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	36	--	33	--	69	Sixty-Nine
Urdu (Comp)	200	49	--	43	--	92	Ninety-Two
Islamic Education	50	29	--	--	--	29	Twenty-Nine
Pakistan Studies	50	--	--	21	--	21	Twenty-One
Islamic History	200	47	--	34	--	81	Eighty-One
Islamic Studies	200	70	--	40	--	110	One Hundred Ten Only
Arabic	200	69	--	76	--	145	One Hundred Forty-Five

Total : 1100

547-D Five Hundred Forty-Seven Only

Remarks :

Date : 23 July, 2010

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:

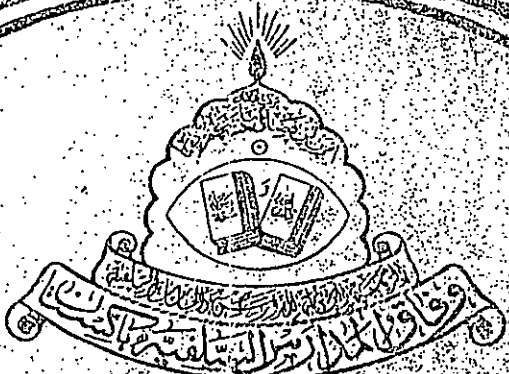
www.biseatd.edu.pk

27

Attested

رقم البلدان: 16291
رقم التسجيل: 18505/231

رقم التسجيل: 16973



شهادة التوفيق العالمية

في العلوم العربية والإسلامية
التي تمنحها وزارة التعليم العالي والبحث العلمي في جمهورية باكستان الإسلامية

عانت وزارة وفان المدارس السلفية باكستان

حميده يوسف

تاريخ ميلاده: 20/06/1987 م محمد يوسف

ابيت آباد طالبات مدرسته تعلم الاسلام للبنات

Attested
شهادة التوفيق العالمية
تستأنف وفان المدارس السلفية باكستان
م 2002 التقدير

عدد درجاته 586 من 900 فقط ورئيس الوفاق اذ يمنحه هذه الشهادة بوصفه بقوى الله

وشمال الله عز وجل ان يسلك به سبيل الصالحين

توقيع الرئيس العام توقيع الامين العام

توقيع المسجل العام 11/01/2003 م



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ
Begin with name of Allah, Most Gracious, Most Merciful.



جامعة تولىمات اسلامية
فصل آباد



الحمد لله رب العالمين
والصلاة والسلام على سيد المرسلين

يشهد بأن حامل / حاملة هذه الشهادة نجح / نجحت في الامتحان ونتمنى له / لها السداد والتوفيق
ونوصيه / نوصيها بتقوى الله سبحانه وتعالى في السرو العلانية وهو الموفق والمستعان.

*All the praises and thanks are to Allah, the Lord of Alameen
(Mankind, Jin and all that exists) and peace be upon the Master of Messengers.
This is to certify that the bearer of this certificate has passed the examination.
Allah may guide him/her to the straight path of Islam to serve the mankind.*

Name	الاسم	Academic Stage	المرحلة
حميده يوسف		تحفيظ وتجويد القرآن الكريم	
Father's Name	اسم الوالد	Year of Exam.	عام الامتحان
محمد يوسف		١٤٢٩/٤٢٠٠٨ هـ	
Grade	التقدير	Certificate No.	رقم الشهادة
ممتاز		٠٦٣٦	
		Date of Birth	تاريخ الميلاد
		٢٠ - ٠٦ - ١٩٨٧	

Attested

Director

الرئيس

جامعۃ اخصاء للذوات امیٹ آباد

تصدیق کی جاتی ہے کہ معلمہ حمیدہ یوسف بنت محمد یوسف نے تجوید القرآن اور حفظ القرآن
کے نوٹل نمبر 100 میں سے 97 نمبر حاصل کیے ہیں۔



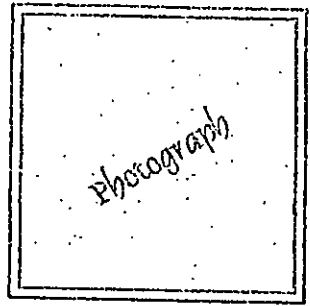
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Annex 'A'

Domicile Certificate

N.W.F.P. DISTRICT

MANSEHRA



I declare that I am born of parents who are/were permanently domiciled in NORTH WEST FRONTIER PROVINCE having been born/settled in this province.

I was born at Village/Mohallah BANDI KHAN KHILL, PO Matserian

Tehsil MANSEHRA District MANSEHRA Hazara Division

Signature of Applicant

Date 10.1.2008

Pursuance to the Declaration date 10.1.2008

Attested
Aslyaq

Filled by Mr./Miss./Mrs. HAMEEDA YOUSAF S/D/W/O MUHAMMAD YOUSAF

Domiciled in North West Frontier Province, It is here by certified that the said HAMEEDA YOUSAF is born of parents who are/were/permanent residents of the North West Frontier Province, having been born/settled within it.

I have satisfied myself from Personal/my Knowledge verification that the above declaration is true and certify accordingly.

This 14/19 Day of Feb: 2008

Countersigned
District Officer
Revenue & Estate

No 859 dated 14.2.08
[Signature]

Deputy District Officer
Revenue & Estate
[Signature]

کے لئے ایک ایسی کمیٹی تشکیل دی جائے جو
ذمہ دار ہو کہ اس کی رپورٹیں
۲۰۰۸ء کے سہ ماہی رپورٹ میں

Radia-e-Karim
NAZIM
Union Council Phulra (Mansoura)

جناب عالی:-

حسب اہدائیہ برائے زمانہ تنویری ناظم بلا عملیہ (مائنسٹر)
سماۃ عبیدہ یوسف و حفیز محمد یوسف ساکن باندی خان محلہ فی ایبڈ اجداد
ریاستی، پیدائشی و ساکنی ہے۔ نیز سائلہ مذکورہ والد محمد عبیدی سال ۲۰۰۲
میں کفایت نہیں ہے۔

Attested

22-01-08

29/01/08

29/01/08

حکومت و تعمیرات حکومتی منصوبہ جسٹس پیس

حکومت و تعمیرات حکومتی منصوبہ جسٹس پیس کے تحت...

Table with 2 columns: Bid No. and Bid Description. Includes items like 'Supply of...', 'Construction of...', etc.

Pre Bid Meeting details including date (31-5-2011) and time (11:00 AM).

- 1) Bidder must be a resident of Pakistan...
2) Bidder must be a citizen of Pakistan...
3) Bidder must have a valid NTN...
4) Bidder must have a valid NTN...

Main bid table with columns: Bid No., Bid Description, Bid Amount, etc. Includes items like 'Supply of...', 'Construction of...', etc.

Additional conditions and terms for the bid, including requirements for bid validity and payment terms.

Handwritten signature: H. H. H. H.

P-18

Annex-C

TAT-2 FEMALE MANSEHRA RESULT 2011

Roll No	Name	Father Name	Marks	%age
1700172	AMINA HAIDER	MIR HAIDER	160	53.33
1700173	FARHANA	M HUSSAIN	108	Fail
1700174	SAJIDA	MALIK AMAN	136	45.33
1700175	BIBI NOREEN	ABDUL HAMEED	84	Fail
1700176	RAHEESA	MOHD SULMAN	152	50.67
1700177	YASMIN	MOHD YAMEEN	104	Fail
1700178	SHAMILA BIBI	BEHRAM	152	50.67
1700179	ASMA BIBI	MOHD GULZAR	136	45.33
1700180	BIBI NAGINA	ABDUL RASHID	120	40.00
1700181	SUMIRA	ABDUL HAMEED	120	40.00
1700182	SAFIRA BIBI	ABDUL HAMEED	112	Fail
1700183	SOBIA	ABDUL RASHID	76	Fail
1700184	BIBI FARZANA	ALI ASGHAR	88	Fail
1700185	BIBI FARZANA	ALI ASGHAR	Not Alloted	#VALUE!
1700186	RIZWANA	MOHD BANARAS	180	60.00
1700187	SHAMILA	ABDUR RASHID	136	45.33
1700188	SHAMILA BIBI	ABDUL RASHID	Not Alloted	#VALUE!
1700189	NADIA FIDA	FIDA MOHD	156	52.00
1700190	SAIQA	M. ISHTAQ	Not Alloted	#VALUE!
1700191	IQRA ZAHEER	ZAHER UD DIN	100	Fail
1700192	NAILA BIBI	LIAQUAT ALI	136	45.33
1700193	MEHBISH	M. TARIQ	160	53.33
1700194	SAIQA	MUHAMMAD ISHAQ	136	45.33
1700195	TAHIRA SABIR	SABIR HUSSAIN	156	52.00
1700196	SAFIA BIBI	HABIB REHMAN	196	65.33
1700197	BIBI HANIFA	ABDUL QAIM	188	62.67
1700198	SHABNUM BIBI	MOHD KHALID	104	Fail
1700199	UZMA SHAZADI	BASHIR AHMED	108	Fail
1700200	HAMEEDA	MOHD YOUSAF	424	41.33
1700201	SAIRA	MOHD MISKEEN	100	Fail
1700202	SOMIA BIBI	ARIF SHAH	152	50.67
1700203	AZRA BIBI	YAR MOHD	148	49.33
1700204	FAIQ KHAN	SAIN MOHD	136	45.33
1700205	RIZWANA YASMIN	Haji AHMED	108	Fail
1700207	MUSSRAT	MOHD ASHRAF	136	45.33
1700208	BIBIGULNAZ	ABDUL RASHID	68	Fail
1700209	NIGHAT	WALI REHMAN	116	Fail
1700210	SALWANA BIBI	MOHD BASHIR	112	Fail
1700211	HUMAIRA RIAZ	MOHD RIAZ	116	Fail
1700212	SUMIRA GUL	KHAN BAHADAR	124	41.33
1700213	ANSA BIBI	JEHANZEB	152	50.67
1700214	SADIA	MANZOOR AHMED	136	45.33
1700215	SADIA BIBI	ABDUL SALAM	132	44.00
1700216	SHAMILA BIBI	ABDUL RASHID	132	44.00
1700217	UZMA	HAIDER ZAMAN	80	Fail
1700218	FOZIA RAFIQUE	M RAFIQUE	104	Fail
1700219	KOSAR YASMIN	HAUDER ZAMAN	96	Fail
1700220	FAIZA BIBI	ABDUL MANAN	132	44.00
1700221	UZMA SHAHZADI	MOHD MUNSAF	132	44.00
1700222	NAHEEDA BIBI	ABDUL REHMAN	144	48.00
1700223	NAHEEMA BIBI	MOHD FAIRDOON	148	49.33
1700224	MARYUM BANO	MOHD YOUSAF	120	40.00
1700225	SALMA BIBI	MOHD NAZIR	124	41.33
1700226	MEHNAZ	GHAZI UR REHMAN	136	45.33
1700227	SADIA	WALI DAD	92	Fail

Rafiq

Annex: D
 Annex: F

OFFICE OF THE EXECUTIVE DISTRICT OFFICER P.S. EDUCATION MANSEHRA

ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following Qaria teachers (Female) against vacant posts mentioned against each in BPS-9 @ Rs. 6200-380-17600 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:-

1/3
 District Education Officer
 (P) Mansehra

S#	Name	Father Name	Address	Place of Posting	Remarks
1	BIBI BUSHRA	FIDA HUSSAN	MANGLOOR	GGHS KASSA	AV/Post
2	SHAZIA BIBI	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 HUSSAIN	MANGLOOR	GGHS THATHI KHURD	AV/Post
8	ASMAT BIBI	ABDUL REHMAN	LASSAN NAWAB	GGHS LASSAN NAWAB	AV/Post
9	BIBI MARIUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	AV/Post
10	SAMMIYA RAHIEM	RAHIM SHAH	OGHI MANSEHRA	GGHS OCHI	AV/Post
11	SAIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLAN	AV/Post
12	ALYA BIBI	ALI KHAN	AFZALABAD	GGHS FANGAR	AV/Post
13	AYSHA KANWAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID	AV/Post
14	AMBER ZEB	ALAM ZEB	PHULRA	GGHS PHULRA	AV/Post
15	AISHA BANQ	SHAHZADA	MLI POLE MANSEHRA	GGHS BAFFA	AV/Post
16	BUSHRA BIBI	LAL KHAN	PHULRA	GGHS SAWAN MAIRA	AV/Post
17	MAMCONA WAJID	WAJID	BILARKUND	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 MOHAYAN	AV/Post

Attested
 Rashid

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.

(Signature)

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 testimonials/Registration copy of their Madrasa (Institutions), along-with bank drafts in the name of controller/ treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the (a) receipt of verified documents by the appointing authority / (EDO E&SE Manshira) (b) duly attested & verified registration copy of the concerned Dini Madrassa (Institutions), where he/she has obtained his/her Sanad/Certificate.
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Manshira.
11. They may not be handed over the charge if their age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in 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.

Ashraf

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

Endst: No 883-942 / Estt: (F) Apptt: Qaria (F) / 2012 Dated Manshira the 16/6 2012
Copy to the:-

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

[Signature]
EXECUTIVE DISTRICT OFFICER,
E&SE MANSEHRA



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Annex 'F'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7744 / DEO/ 2014

Email: deofmanshra@yahoo.com

Date: 29/9/ / 2014

Phone & Fax: 0997-302518

To .

Head Mistress
Govt. Girls High School

Subject:

Issued

SHOW CAUSE NOTICE

Memo:

Show Cause notice in respect of Mst Nabeeda Bano D/O
Muhammad Yousof 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.

Attested
Ashfaq

[Signature]
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.

ذریعہ حیات بہ ڈی او اعلیٰ زما نڈہ عدالت ایجوکیشن ڈیپارٹمنٹ
گزارش کے سائلہ علیہ و سلف جو کہ گورنمنٹ ٹرلز ہائی سکول ٹرپی

حیات عالیہ!

ذریعہ حیات بہ ڈی او اعلیٰ زما نڈہ عدالت ایجوکیشن ڈیپارٹمنٹ

میں مورخہ 2013-06-19 سے ایک ڈریسنگ فرائلٹ سمر انچا (دے ریسی ڈے کا)

آرڈر کارپوریشن پر مبنی # 893-942 Enclst (16-06-2012) کو کارپوریشن
میں اعلیٰ سائلہ ایک فریٹ میں ایک جاری کردہ شوکارز فونڈیشن کے واسطے

مقررہ چیزیں معلوم دینا چاہیے۔ سائلہ نے (نئی ٹیم) اعلیٰ اسناد انٹرویو میں

جیک کر دلی مقیم۔ حیات عالیہ! مجھے آپ کا شوکارز فونڈیشن مورخہ 04-11-19

کو موصول ہوا ہے۔ جس میں میری appointment و سڈ جو میری علم و مقیم کی

بنام مشترک کیا جا رہا ہے۔ جبکہ مجھے سڈ حفظ القرآن جمع سڈ جو میری القرآن

جامعہ تعلیمات اسلامیہ منٹل آباد سے ایک سڈ جو علی یہ ادارہ گورنمنٹ سے بنا جائے

درخواست کے۔ جسکی فوٹو کاپی درخواست کے ساتھ منسلک ہے اور آپ کے سڈ کے لئے اعلیٰ

دستاویزات کی فوٹو کاپی بھی آپ کے حکم کے مطابق ارسال فرمیت ہیں

براہ مہربانی میری درخواست پر توجہ کیا جائے سائلہ محنون و تشکر ہے

Attested
Rashid

شکر ہے

محمد وسف قاریہ

گورنمنٹ ٹرلز ہائی سکول ٹرپی

Handwritten mark

دستخط

Forwarded in original for further necessary action plz.

HEAD MISTRESS
Govt. Girls High School
Trappi (Manshra)
20-11-14



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Amir G

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Hameeda Yousof D/O Muhammad Yousof working as Govt. GGHS/GGMS/GGP Trappi 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. Hameeda Yousof D/O Muhammad Yousof CT/PET/TT Qarica GGHS/GGM/GERS Trappi

Mst. Hidayat
Rashid

(Signature)

DISTRICT EDUCATION OFFICER
FEMALE: MANSAEHRA.

Endst: No. 1606-15 /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 _____
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: _____
10. Office File.

(Signature)

DISTRICT EDUCATION OFFICER
FEMALE: MANSAEHRA.

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Annex 'H'

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDORSEMENT NO.1606-15 DATED 3RD MARCH 2015 WHEREBY MAJOR PENALTY OF DISMISSAL FROM GOVERNMENT SERVICE WAS IMPOSED UPON THE APPELLANT IN A HIGH CAPRICIOUS/WHIMSICAL MANNER WITHOUT LAWFUL AUTHORITY (COPY OF THE IMPUGNED NOTIFICATION IS ATTACHED)

Prayer:- CAPTIONED IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM THE DATE OF ITS ISSUANCE DECLARING THE SAME WITHOUT LAWFUL AUTHORITY CONTRADICTORY TO THE RECRUITMENT POLICY & RULES AND RE-INSTATE THE APPELLANT WITH ALL BACK BENEFITS AT THE SAME STATION.

Respected sir:-

I would like to invite your kind attention to the following facts in connection to colorful exercise of power on the part of authority i.e DEO (F) Mansehra.

R. S. Jafar

1. That the then Executive District Officer E&SE Mansehra invited applications for recruitment of teachers of various cadres in District Mansehra through advertisement published in daily MASHRAQ.
2. That as per procedure appellant applied for the post of Qari being a qualified teacher having Hifz o Tajveed Certificate with Alia, FA and ETA Test was conducted on 26/02/2011 and appellant appeared as a candidate and obtained 124 marks out of 300 under Roll No.1700200.
3. That the then EDO conducted interview and scrutinized the documents of the candidates, and merit list of the candidate was displayed for receiving objections. After due official process the meeting of DSC was held and approved the cases of Qaria candidates for appointment against the vacant posts of Qaria.

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Annex 'H'

4. That appointment order of the appellant was issued under endorsement No. Endst: 893-942 dated 16/06/2012 and appellant was posted at GGHS Jared and after 1 year I am transferred from GGHS Jared to GGHS Trapi.
5. That appellant continuously performing her duty without any break for more than 2 Years while a show cause notice whereby allegations were leveled against the appellant based on concoction, baseless & concealment of facts:
6. No show-cause were issued to most of the teachers, the DEO have signed the show-cause and kept in file so that she can argue that no reply was made by the teacher for which she have dismissed. Whereas the appellant have replied properly (Copy attached)
7. The appellant was appointed after due recruitment process and her appointment order along-with others candidates was issued in a lot after the approval of DSC.
8. That appellant received impugned order dated 3rd March 2015, whereas the major penalty of dismissal from service has been imposed upon the appellant. (copy of the dismissal is attached)
9. That the appellant passed here professional qualification i.e , Hifz o Tajveed with Almia and FA. All the degrees and certificates were also get verified from the concerned University / Board / Institutions by the District Officer (Female)
10. It is requested that my appointment was made by the then Executive District Officer E&SE Mansehra after observing all the codal formalities and according to the rules and regulation, my dismissal order in the light of charges leveled against me are strictly baseless and concoction.

Reddy

Sir,

- a) Appellant was appointed after due process of recruitment through ETA test and her appointment order was issued after the approval of DSC. The appellant served as regular teacher in Education Department for more than 2 years and

P-26
Annex 'H'

no action was taken nor show-cause was served neither asked for any irregularities or personal hearing during the Probation period.

- b) No inquiry was conducted or initiated, no opportunity of defense was offered, no personal hearing was made, how the authority was passed in the light of E&D rules under what charges/ evidence imposed such a harsh punishment.
- c) The inquiry regarding illegal appointment was made against the then EDO not against the candidates/teachers.
- d) The enquiry was made and in the finding no recommendation was issue for the termination/dismissal of teachers, they only recommended the appointing authority for minor punishment as one step down or 2 deductions of 2 increments.
- e) The District Education Officer has dismissed all the teachers appointed during 2012, from Government service after three years, which is absolutely against the rules regulation and clear cut against the human rights and against the justice.

In the light of the above facts, it is humbly requested that to set aside the impugned dismissal order /notification that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellatant with all back benefits at the same station.

Attested
A. Yousaf

21/3/2015
Hameeda Yousaf D/O Muhammad
Yousaf Village Bandi Khankhail, P/O
Madsarian District & Tehsil Mansehra

13503-78426040

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Annex - "1"

LEOPARDS COURIER SERVICES PVT. LTD.

From: _____ To: Kapil Khatake 57308274

From: Hanish Yousif Pieces _____

CASH 110 NO DECLARED VALUE DATE 21-3 Weight _____
 Price Inclusive of G.S.T. 12-00 9808-001-91
 SIG _____ TIME _____

"Leopards" Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed All the Conditions Printed on Reverse

کاپل خٹاکہ نے اپنی شے لاپارڈ کوریئر سے بھیجی ہے۔ اس کے ساتھ ساتھ وہ اس کے لیے تمام شرائط سے اتفاق کر چکے ہیں۔

For Suggestions/Complaints Contact info@leopardscourier.com
 Now Send Gifts To Your Loved One's By Leopards Loveline
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P-28

Amir J

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JAMIA TALEEMAT-ISLAMIA
FAISALABAD



جامعہ تعلیمات اسلامیہ

الرقم ۵۵ شارع سرچودھا
التاریخ ۲۴/۴/۲۰۰۳ ص ب ۷ فیصل آباد پاکستان

محترم مدیر جامعہ خساء للبنات ایبٹ آباد۔

السلام علیکم ورحمۃ اللہ وبرکاتہ!

آپ کی ارسال کردہ درخواست بموضوع ”الحاق“ ہمیں موصول ہوا اس پر غور و فکر کے بعد آپ کے ادارہ کا الحاق جامعہ تعلیمات اسلامیہ کے ساتھ بتاریخ 15/8/2003 کو ہوا۔ اس خط کے ذریعے آپ کو مطلع کیا جاتا ہے۔

والسلام

ناجیب مدیر

جامعہ تعلیمات اسلامیہ

سرگودھا روڈ فیصل آباد

تیلیفون: ۷۴۷۹۱۱-۴۱

۷۴۷۹۱۱-۴۱



Attested


BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No: 749/2015

Respectfully Shewth

1. That the services appeal No: 759 /2015 in respect of MST: Hamida Yousaf is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4236-41 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qaria (Notification attached).

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


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA
A.S.D.

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Hameeda, Qaria at Government Girls High School Trappi District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1606-15 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. 19 of the merit list. Both her asnad of Hifzul Quraan and sanad of Tajveed ul quraan are from Madrassa Jamiaa Taaleemat e Islamia Faisal Abad. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.18.

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. 1606-15 dated 03/03/2015 and reinstate Ms. Hameeda, Qaria, at Government Girls High School Trappi District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4236-41 /F.No. 79/Appeals Female MSR Dated Peshawar the 25/8 /2015

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

1. District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Hameeda, 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)
E&SE KP

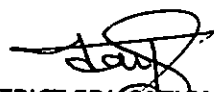
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 749/2015

Respectfully Shewth

1. That the services appeal No: 759 /2015 in respect of MST: Hamida Yousaf is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4236-41 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qaria (Notification attached).

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


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

ADD

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Hameeda, Qaria at Government Girls High School Trappi District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1606-15 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.

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

1. Her name was at S.No. 19 of the merit list. Both her asnad of Hifzul Quraan and sanad of Tajveed ul quraan are from Madrassa Jamiaa Taaleemat e Islamia Faisal Abad. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.18.

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. 1606-15 dated 03/03/2015 and reinstate Ms. Hameeda, Qaria, at Government Girls High School Trappi District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4236-41 /F.No. 79/Appeals Female MSR Dated Peshawar the 25/8 2015

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

1. District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Hameeda, 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)
E&SE KP