

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 10.3.2015 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.


Chairman

Camp Court A/Abad

20.10.2015

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

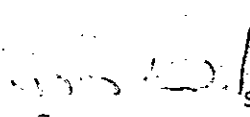
In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn.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


Chairman
Camp Court A/Abad.
20/10/15

ANNOUNCED
20.10.2015



Appellant Deposited
Security & Process Fee


Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 747 /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. Rashida Zeb 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> 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> CHAIRMAN</p>

**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Appeal no. 747/2015

Mst. Rashida Zeb.....Appellant

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.	1-8
2	Application for status-quo.	9-10
3	Correct addresses of the parties.	11
4	Copies of educational record.	"A"	12-17
5	Copy of the advertisement.	"B"	18
6	Copies of E.T.A Test result.	"C"	19
7	Copy of the appointment order.	"D"	20-21
8	Copy of the impugned order dated 03.03.2015.	"E"	22
9	Copy of the Departmental appeal.	"F"	23-25
10	Copy of the receipt.	"G"	26
11	Copy of the election duty letter dated 12.05.2015.	"H"	27
12	Wakalat Nama.	28

Dated 01.07.2015

Rashida Zeb
Mst. Rashida Zeb
...Appellant

Through

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

P-①

**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Appeal no. 747/2015

Mst. Rashida Zeb daughter of Aurangzeb
resident of Dhangri Bala, Tehsil and District
Mansehra, Ex-D.M Government Middle School
Kamal Ban, Tehsil Balakot District Mansehra
.....Appellant

**K.P. Province
Service Tribunal**
Diary No. 767
dated 6-7-2015

VERSUS

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
.....Respondents.

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
ORDER ENDST NO.1756-65/AE-I/ESTAB:
DATED 03.03.2015 VIDE WHICH THE
APPELLANT WAS DISMISSED FROM
SERVICE.**

Registrar
6/7/15

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.

Respectfully Sheweth!

1. That, the appellant is resident of Dhangri Bala, 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 A.T being a qualified teacher having D.M Certificate with M.A & B.Ed. 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.1702652.

(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 D.M candidates for appointment against the vacant post of D.M and the appointment order of the appellant was issued under Endst. No.5385-5413/Estt: Apptt: DM/2011-12 dated 18.05.2012 and the appellant was posted at GGMS Kamal Ban.

(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 received her salaries till June 2015.
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 without any show cause notice or

without giving a chance of personal hearing to the appellant, terminated her services 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 "E").

8. 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 "F & G").

9. That, the appellant was also directed to perform election duty during the local election of 2015.

(Copy of the letter dated 12.05.2015 is annexed as annexure "H").

10. 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 were terminated on the fact that the appellant's appointment was the result of misuse of the authority by the then E.D.O Mr. Umer Khan; such fact cannot legally be made base for removal from the service and same is the case of appellant. The appellant legally, as per the principle of natural justice, as per the rule of good governance and in the light of her fundamental rights guaranteed in the constitution could not have been penalized with major penalty for act, howsoever, illegal, unjustified and without jurisdiction of the then E.D.O Mr. Umer Khan.
- iii. That, the services of the appellant were terminated on a ridiculous premise which

is that original documents were not available with the inquiry officers who were inquiring into the appointment and legality thereof. The Education Department/ respondents did not provide original documents to the inquiry officers and unfortunately the inquiry officers did not bother to ask for the same from the appellant. The documents are genuine and can be put to the litmus test are still available with the appellant and the issuing authority logically.

- iv. That, impugned order is self-explanatory and worth considering for reinstatement of the services of the appellant.
- v. 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.
- vi. 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.

- vii. 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

Rashida Zeb
Mst. Rashida Zeb
.....Appellant

Through

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

AFFIDAVIT.


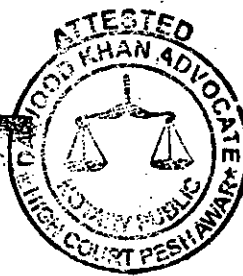
I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief as per information furnished by my client and nothing has been concealed from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

Dated 01.07.2015



MALIK ASHAQ AHMED JILANI,
Advocate High court,
Mansehra.

06 JUL 2015



**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Mst. Rashida Zeb.....Appellant

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

Rashida Zeb
Mst. Rashida Zeb
...Appellant

Through

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

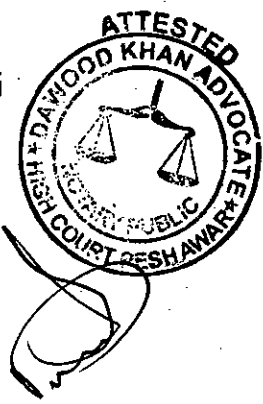
AFFIDAVIT

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 as per information furnished by my client 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

Ashfaq
MALIK ASHFAQ AHMED JILANI,
Advocate High court,
Mansehra.

06 JUL 2015



P-11

**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Mst. Rashida ZebAppellant

VERSUS

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

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Mst. Rashida Zeb daughter of Aurangzeb
resident of Dhangri Bala, Tehsil and District
Mansehra, Ex-D.M Government Middle School
Kamal Ban, Tehsil Balakot 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

Rashida Zeb
Mst. Rashida Zeb
...Appellant

Through

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

PA NO 002874

Roll No. 722

Attested
Rashid

P-12
Annex A

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Abbottabad N.W.F.P. Pakistan
PROVISIONAL CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
Session 19 83 Annual/Supplementary

THIS IS TO CERTIFY THAT Rashida Zeb
Son/Daughter of Aurang Zeb
and a candidate of Ma

has passed the Secondary School Certificate Examination of the
Board of Intermediate and Secondary Education, Abbottabad held in Oct 19 83
as a Regular/Private candidate. He/She obtained 469 Marks out of 850 and has
been placed in Grade(C) Representing Good

The Candidate passed in the following subjects.

- | | | | |
|--------------------|----------------------|----------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pakistan Studies |
| 5. <u>Q. math.</u> | 6. <u>Q. science</u> | 7. <u>ETHE</u> | 8. <u>95</u> |

Internal assessment Grade by the institution concerned is (X)

Date of birth according to admission form is 11th March

One thousand nine hundred and Seventy eight (1978)

Prepared by [Signature]

Checked by [Signature]

Date of Preparation 8/13/84

V. Nazakat
Asst. Secretary (Certificates)
Asst. Secretary (Certificates)
Board of Intermediate & Secondary Education Abbottabad

*Attested
Asif*

Roll No. 19431

Registration No. 202-AB/9005-94

PROVISIONAL CERTIFICATE

INTERMEDIATE (ANNUAL) EXAMINATION 1996

Certified that Miss RASHIDA ZEB
 Daughter of AUBAN S. ZEB
 and a regular student of this College from 9-2-1994 to 30-4-96
 under College Roll No. 1321 She appeared as **REGULAR/PRIVATE**
 candidate in the Intermediate (**Annual/Supplementary**) Examination, 1996. of the
 Board of Intermediate and Secondary Education ^{Peshawar} and according to the
 Result Gazette issued by the B.I.S.E. ^{Peshawar} is declared successful in the
 above said Examination, obtaining 599 Marks in C GOOD.

She had passed the following Subjects:-

- 1. English.
- 2. Urdu
- 3. Pak. Studies.
- 4. Islamic Education
- 5. Islamic History
- 6. Civics
- 7. Urdu Advance

Her date of Birth according to the S.S.C is 11-3-1978 (Olom Niaz N/14 + Savitri 4182)

Her conduct during her stay in this College was GOOD.

PREPARED BY: *[Signature]*

DATED 16/11/96

[Signature]
 PRINCIPAL
 Govt. Degree College for Girls
 Manshera
 Govt. Degree College For
 Manshera (Hazara)

P-14

No 088059

Attested
Deputy

UNIVERSITY OF PESHAWAR

(PAKISTAN)



DETAILED MARKS CERTIFICATE

Roll No 88059

B.A. PART - II EXAMINATION. 1999 (Annual/Supplementary)

Name Rashida Zeb

Father's Name Aurangzeb

Certified that the candidate secured the following marks and is placed in First Division.

S U B J E C T S	M A R K S O B T A I N E D		
	MAXIMUM MARKS	IN FIGURE	MARKS IN WORDS
1. English	75	24	Twenty - Four
2. Urdu	75	31	Thirty - One
3. Isl. Studies	75	35	Thirty - Five
4. Pakistan Studies	40	23	Twenty - Three
B.A. Part - I marks	285	141	/
TOTAL	550	254	Two hundred + Fifty Four

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a Whole/ in Parts.

RESULT DECLARATION DATE

Date

[Signature]
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Rashida Zeb



UNIVERSITY OF PESHAWAR
(Pakistan)

Bachelor of Education, Annual Examination 2003

Detailed Marks Certificate

Required: Pass Percentage - 40, Aggregate Pass Percentage - 45

Name: *Rashida Zeb*

Father's Name: *Aurangzeb*

Gender: *Female*

Roll No. **1679**

Registration No. *97-PS-18649*

The Candidate appeared from: *Mansehra*

The Candidate secured 2nd division in THEORY and 2nd division in PRACTICE OF TEACHING; and has been placed in overall 2nd division.

Subjects / Papers	Marks Obtained		
	Maximum Mark	In Words	
Educational Psychology, Guidance & Counselling	100	42	Forty Two
Perspectives of Education & Contemporary Social Issues	100	47	Forty Seven
Curriculum and Instructions	100	42	Forty Two
Islamiyat and Islamic Ethics / Islamic History (for Non Muslims)	50	30	Thirty only
School Organization and Classroom Management	50	20	Twenty only
Functional English	50	25	Twenty Five
Evaluation Techniques	50	20	Twenty only
I. Methods of Teaching in <i>English</i>	100	51	Fifty One
II. Methods of Teaching in <i>Urdu</i>	100	63	Sixty Three
Elective Subject: <i>Foundation of Education</i>	100	49	Forty Nine
Practice of Teaching	200	115	One Hundred and Fifteen
Total:	1000	504	Five Hundred and Four

No. *007445*
Errors and omissions are subject to subsequent verification.

The examination was passed as a Whole

Examination Held in Theory: 28.07-20.08. 2003
Teaching Practice: 21-31.08. 2003
Regular Students: (21-31) 05. 2003
Private Candidates: (10-20.09. 2003)
Private Candidates: (10-20.09. 2003)

Controller of Examinations

Attested
Rashid

P-15
Annex A



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

S/No: 4686

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL) ANNUAL 2008

Roll No: 18326

Registration No: 07-P-754

Student's Name: Rashida Zeb

Father's Name: Aurangzeb

Institution/District: Mansehra

Subject: Islamiyat

Course Title	Total Marks	Marks Obtained	Marks In Words	Remarks
MA Previous Marks	500	328	Three Hundred & Twenty-Eight	Pass
(VI) (Al-Qura'an) Translation 2nd Part & Commentary alongwith Grammar	100	53	Fifty-Three	Pass
(VII) Principles of Islamic Jurisprudence	100	50	Fifty	Pass
(VIII) Islam & other World Religions	100	64	Sixty-Four	Pass
(IX) Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100	57	Fifty-Seven	Pass
(X) Islamic Economics / Islamic Politics / Islam & Science	100	60	Sixty	Pass
General Viva Voce	100	48	Forty-Eight	Pass
Total	1100	660		
Percentage	60.00 %			
Division	First			



Checked by: *[Signature]*

Errors and omissions are subject to subsequent rectification. 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
January 29, 2009

Attested
Ashraf

Govt. College of Education for Elementary Teachers (Women)
GHAZIKOT MANSEHRA



PROVISIONAL CERTIFICATE

Session 2000-01 Roll No. 463 Computer Code No. _____

This is to certify that Miss. Rashida Zeb
D/o Aurang Zeb who has been a regular Student of
P.F.C/D.M./~~GT~~ Class has passed the Departmental Examination of the Board of
Peshawar held on 14-9-2001. She has obtained 831 Marks 1st Division.

Date of declaration of result 31-3-2002

Elective Subject _____

Distinctions 1st Position in NCCP

Her conduct/Character during her study was Good

Dated 12/4/2002

Checked by Ashraf

[Signature]

PRINCIPAL
GOVT. COLLEGE OF EDUCATION
FOR ELEMENTARY TEACHERS (W)
GHAZIKOT MANSEHRA DISTRICT

S. No.

1077

P-17
Annex 'A'

Departmental Examinations Education Department



NWFP

Detailed Marks Certificate

Training Classes Examination (Drawing Master)

Name Rashida zebSession 2009Father's name AurangzebRoll No. 463

Subject	Maximum Marks	Marks obtained		
		Internal	External	Total
1. Scale, Technical and Geometrical Drawing: Free hand Sketching	100			92
2. Model Drawing	50			38
3. Nature Study	50			42
4. Black Board Sketching	50			37
5. Craft	200			160
6. Islamiyat	100			85
7. History of Art	100			65
8. Expressional Drawing	50			39
9. Physical Education	50			38
10. Design	50			44
11. Teaching Practice	200			191
Total	1000			831

Note: Errors/omissions excepted.

Passed/Failed _____

Division: ISG

Prepared by _____

Checked by _____

Date of Declaration of Result _____

Registrar
Departmental Examinations Education Department
NWFP, Peshawar.

Annex B

پنجاب کوہستان کے تمام سرکاری سکولوں اور فائز میں درج ذیل نمائی (سوجوہ اور حقوق) آسامیاں پر کرنے کیلئے منتخب کوہستان کے سکول کی امیدواروں سے گورنر کا فارم پر درخواستیں جمع کروانے کی تاریخ کے بعد ہوسکتی ہیں جو کہ مورخہ 10 ستمبر 2013 تک دفتری اوقات کار میں دفتر چارجنگ کوئی جا نہیں ہے۔

نمبر	نمبر ایڈریس	مقامی تعلیمی قابلیت	مرکیٹ	مہریت کا تقرری	تاریخ انٹرویو	مقام انٹرویو
1	بی ای ٹی	بی ای ٹی یا بی ای ایڈی کی مساوی قابلیت کسی بھی منظور شدہ یونیورسٹی ہمدردی کی سرٹیفکیٹ یا ڈیپلوما	518 سال 35	Seniority Cum Fitness=60% Open merit 40%	5-9-2013 پوقت 9:00 AM	گورنر کا دفتر پٹی سول
2	بی ای ٹی	Associate Degree in Education from a recognized University 18 مہینے کا ڈیپلوما ان ایجوکیشن	518 سال 35	Seniority Cum Fitness=20% Open merit 80%	6-9-2013 پوقت 9:00 AM	DEO Office (M) Kohistan
3	ڈی ایم	بی ای ایڈی یا بی ای ایڈی کی مساوی قابلیت کسی بھی منظور شدہ یونیورسٹی ہمدردی کی سرٹیفکیٹ یا ڈیپلوما JDPE یا آئی آر ٹی کی طرف سے مساوی سند یا دوسری مساوی قابلیت	518 سال 35	Seniority Cum Fitness=20% Open merit 80%	5-9-2013 پوقت 9:00 AM	DEO Office (M) Kohistan
4	ای ٹی	SSC سینکڑے ڈویژن بعد شہادۃ العالمیہ فی العلوم والا سلامیہ کی منظور شدہ وفاق المدارس یا دارالعلوم سید و شریف سوات دارالعلوم چار باغ سوات دارالعلوم چترال دارالعلوم دروش چترال یا ایم اے عمری سینکڑے ڈویژن کی سند پر غور کی	520 سال 35	100% کی تقرری اوپن میرٹ کی بنیاد پر ہوگی	6-9-2013 پوقت 9:00 AM	DEO Office (M) Kohistan
5	بی ٹی	سیکڑے ڈویژن بعد شہادۃ العالمیہ فی العلوم والا سلامیہ کی منظور شدہ وفاق المدارس یا دارالعلوم سید و شریف سوات دارالعلوم چترال دارالعلوم دروش چترال یا ایم اے اسلامیات سینکڑے ڈویژن کی سند پر غور کی	520 سال 35	70% open merit بی ٹی کی تقرری میں سینکڑے ڈویژن کی بنیاد پر ہوگی	15-9-2013 پوقت 9:00 AM	DEO Office (M) Kohistan
6	قاری	ایف اے بعد حفظ القرآن و سنت قرأت کی کسی بھی منظور شدہ ادارے سے	518 سال 35	100% کی تقرری اوپن میرٹ کی بنیاد پر ہوگی	15-9-2013 پوقت 9:00 AM	DEO Office (M) Kohistan
7	بی ای ٹی	ایف اے یا ایف اے ایس سی یا بی ای ایڈی کی سرٹیفکیٹ یا ڈیپلوما ان ایجوکیشن یا SSC سینکڑے ڈویژن بعد دو سال Associate Degree in Education from recognized University	518 سال 35	100% تقرری یونین کونسل کی سطح پر میرٹ کی بنیاد پر ہوگی	17-9-2013 پوقت 9:00 AM	گورنر کا دفتر پٹی سول
8	Sacked Teachers	درج بالا قابلیت درج بالا کیریئر کے لئے ہوگی	518 سال 35	موجودہ نمائی پرسوں پر سینکڑے ڈویژن کی بنیاد پر ہوگی	17-9-2013 پوقت 9:00 AM	DEO Office (M) Kohistan
9	ٹیچر گرافر	1- ایف اے یا ایم اے کی تعلیم کسی منظور شدہ ادارے سے 2- انگریزی شارٹ ہینڈ میں 50 الفاظ فی منٹ اور اردو ٹائپنگ میں 35 الفاظ فی منٹ 3- Knowledge of computer using MS Word & MS Excel	518 سال 30	100% تقرری میرٹ کی بنیاد پر ہوگی	12-9-13 پوقت 9:00 AM	DEO Office (M) Kohistan
10	پری ٹیچر کلرک	1- کسی بھی تسلیم شدہ بورڈ سے سینکڑے ڈویژن یا مساوی ایلیٹ 2- کپی رائٹر یا ٹائپنگ سینکڑے ڈویژن یا 50 الفاظ فی منٹ (کپی رائٹر میں مہارت رکھنے والوں کو ترجیح دی جائے گی)	518 سال 30	33% Seniority Cum Fitness from the Daftres and Naib Qasids 67% by initial recruitment	12-9-13 پوقت 9:00 AM	DEO Office (M) Kohistan
11	ٹیچر ایڈیٹ	سینکڑے ڈویژن یا مساوی ایلیٹ	518 سال 30	100% open merit	صرف شارٹ لیٹ امیدواروں کو کال کیا جائیگا	DEO Office (M) Kohistan

عمومی شرائط: (1) تمام تقرریوں میں حکومت خیبر پختونخوا کے موجودہ قانون کے مطابق ایڈیٹنگ اور دیگر کی بنیاد پر ہوگی (2) حاضر سرورس ملازمین اسپتال کے طبی معائنہ سے گزرنا چاہئے اور ان کے پاس (3) صحت وارڈ اور ایڈیٹنگ دو نمبر کے طبی معائنہ سے گزرنا چاہئے اور ان کے پاس (4) ایف اے ایس سی یا بی ای ایڈی کی سرٹیفکیٹ یا ڈیپلوما ان ایجوکیشن یا SSC سینکڑے ڈویژن بعد دو سال Associate Degree in Education from recognized University (5) ایف اے ایس سی یا بی ای ایڈی کی مساوی قابلیت کسی بھی منظور شدہ یونیورسٹی ہمدردی کی سرٹیفکیٹ یا ڈیپلوما (6) انٹرویو کے وقت اصل سند بعد حاصل شامی کارڈ پیش کرنا لازمی ہے (7) انٹرویو کے لئے آنے والوں کو کوئی سٹریٹریٹ نہیں دیا جائیگا (8) صرف مقررہ وقت پر حاضری ہونے والی درخواستوں پر غور کیا جائیگا (9) آسامیاں کی تعداد میں کمی ہو سکتی ہے۔ (10) زیر ترقی کو امتیاز حاصل ہے کہ وہ کوئی امیدوار کی طرف سے کسی بھی مقررہ وقت پر حاضری نہ دے کر عدالت عالیہ یا کسی عدالت میں اپنی سہولتوں کو قائم رکھے اور اگر اس وقت عدالت میں ہے تو عدالت سے باہر نہیں آئے گا (11) اگر اس وقت عدالت میں ہے تو عدالت سے باہر نہیں آئے گا (12) ایف اے ایس سی یا بی ای ایڈی کی سرٹیفکیٹ یا ڈیپلوما ان ایجوکیشن یا SSC سینکڑے ڈویژن بعد دو سال Associate Degree in Education from recognized University (13) تمام تقرریوں میں حکومت خیبر پختونخوا کے موجودہ قانون اور طریقہ کار کے مطابق متعلقہ میرٹ کی بنیاد پر ہوگی (14) صرف مقررہ وقت کی منظور شدہ اداروں سے اسناد قابل قبول ہوں گے۔ (15) اگر کسی امیدوار کی اسناد عملی یا بکس پاس کے ہونے کے خلاف قانونی چارہ جوئی کی جائے اور آئندہ کیلئے نااہل قرار دیا جائیگا۔ (16) ہر (Cadre) کیلئے ایک ایک درخواست جمع کرنا ہوگی۔ (17) شامل اور درج سے آنے والے درخواستوں کو غور و تامل سے جائزہ دیا جائے گا (18) خالی آسامیوں میں سے اہل (Sacked Employees) کیلئے 30% کوئٹنس ہے جو حسب قواعد پر کے جائزہ لیں (19) فائل میرٹ لسٹ کے اجراء کے بعد کوئی Waiting List مرتب نہیں ہوگی اور صرف ڈسٹرکٹ سلیکشن کمیٹی کی طرف سے منظور شدہ امیدوار ہی تقرری کے اہل ہوں گے۔ (20) ساتھین گروپ کے امیدواروں کو MSc, BSc, PSC پر پانچ پانچ نمبرات دیئے جائیں گے۔ (21) درخواست فارم دفتری اوقات میں دفتر بنیاد سے حاصل کیا جاسکتا ہے۔ (22) تمام امیدواروں کا ڈیپلوما اور شامی کارڈ میں مستقل سکول کوہستان کا ہونا چاہئے۔ (23) کپی رائٹر یا ٹائپنگ سینکڑے ڈویژن یا 50 الفاظ فی منٹ (کپی رائٹر میں مہارت رکھنے والوں کو ترجیح دی جائے گی) (24) ٹائپنگ سینکڑے ڈویژن یا 35 الفاظ فی منٹ (کپی رائٹر میں مہارت رکھنے والوں کو ترجیح دی جائے گی) (25) تمام تقرریوں کا قضا کی تصدیق ہونے کے بعد کی جائے گی جن کے نمبر اخراجات امیدواروں کو خود برداشت کرنی ہوگی۔ (26) Decensed Children کوئٹنس کے تحت ہونی چاہئے اور اگر کسی کپی رائٹر یا ٹائپنگ سینکڑے ڈویژن یا 50 الفاظ فی منٹ (کپی رائٹر میں مہارت رکھنے والوں کو ترجیح دی جائے گی)۔ (27) ADE کے حامل امیدواروں کو ترجیح دی جائے گی۔ (28) بی ای ایڈی کی کیریئر کے امیدواران اپنی درخواستوں کے ساتھ متعلقہ یونین کونسل کے سیکرٹری ایف اے ایڈیٹنگ سے جاری شدہ ہائی و پیڈ اسٹیٹ سرٹیفکیٹ شامل کریں۔

PARADISE PHOTO SIAT KACHHARY CHOWK MANSEHRA.

TAT-1 FEMALE MANSEHRA RESULT 2011

P-19

Roll No	Name	Father Name	Marks	%age
1702613	AYESHA PERVAIZ	M PERVAIZ	100	Fail
1702614	UNA RAUF	ABDUL RAUF	64	Fail
1702615	RUKSANA	BADRI ZAMAN	92	Fail
1702616	SAMINA MONZOOR	M MANZOOR	72	Fail
1702617	SAIMA NOREEN	ABDUL RASHID	124	41.33
1702618	AMINA BIBI	KHALID HUSSAIN	180	60.00
1702619	SALAM KHALID	KHALID HUSSAIN	160	53.33
1702620	BUSRA	MIMTAZ KHAN	140	46.67
1702622	IQBALBANO		152	50.67
1702623	UZMA BATOOL	S ASHFAQ AHMED	128	42.67
1702624	ASMA SHAHEEN	M MANZOOR	76	Fail
1702625	GUL RENA	ABDUL SHAKOOR	136	45.33
1702626	NASREEN AKHTAR	LAL KHAN	Absent	#VALUE!
1702627	NAILA BIBI	NOOR UR REHMAN	Absent	#VALUE!
1702628	TANZILA AMAN	M AMAN	96	Fail
1702629	LAIBA RAIZ	M RAIZ	128	42.67
1702631	ALYIA JABEEN	GHULAM NOORANI	112	Fail
1702632	SADAF JABEEN	SADIQ HUSSAIN	104	Fail
1702633	SOFIA	HABIB UR REHMAN	116	Fail
1702634	SHAKILA BIBI	M MASKEEN	Absent	#VALUE!
1702635	GUL BIBI	ABDUL QUYYUM	76	Fail
1702636	M. KALSOOM BIBI	ABDUL QUYUM	128	42.67
1702637	KHADIJA	M BADRI ZAMAN	156	52.00
1702638	UZMA ZEB	M AHAFI	104	Fail
1702639	AMINA BIBI	JAHANZEB KHAN	184	61.33
1702640	BIBI MUKHTAR	AHMED NAWAZ	24	Fail
1702642	NADIA BIBI	ALI ZAMAN	84	Fail
1702643	KOSAR KHATOON	JAHANZEB	88	Fail
1702644	YASMIN BIBI	AURANGZEB	Absent	#VALUE!
1702645	BIBI NAZIA	ABDUL REHMAN	136	45.33
1702646	HASINA MUMTAZ	SADIQ HUSSAIN SHAH	124	41.33
1702647	SHAIIDA PARVEEN	MUMTAZ KHAN	Absent	#VALUE!
1702648	NAFISA KHATOON	AURANGZEB	80	Fail
1702649	KOSAR BIBI	SAIN MOHD	72	Fail
1702650	SUMAIRA BANO	M AMAN	92	Fail
1702651		M MASKEEN	84	Fail
1702652	RASHIDA ZEB	ABDUL RAUF	124	41.33
1702654	SADAF AFZAL	SHER AFZAL KHAN	116	Fail
1702655			88	Fail
1702656	MEHNAZ	M MASKEEN	80	Fail
1702658	ANILA RANII	M NAZIR	88	Fail
1702659	FARAKUH ANJUM	M NAZIR	88	Fail
1702661	MUSRAT IQBAL	ARANGZEB	108	Fail
1702663	IRUM SHAHZADI	M IQBAL	72	Fail
1702664	ATTIQA BIBI	ZARDAD KHAN	116	Fail
1702665	AMINA BIBI	FAZAL DAD	104	Fail
1702666	SUMAIRA GUL	FAZAL DAD	136	45.33
1702667	AMBREEN	M YOUNIS	136	45.33
1702668	BIBI YASMIN	ALI ZAMAN	116	Fail
1702669	MUNIZA DAUD	M AMAN	72	Fail
1702670	RIFFAT UN NISA	M DAUD	188	62.67
1702671	SOBIA TABASUM	M SHAFI	Absent	#VALUE!
1702672	KIRAN SHAHZADI	M RAFIQUE	96	Fail
1702673	RIFFAT BIBI	TAJ MOHD	88	Fail
1702674	SHREEN GUL	SJER MOHD	72	Fail
1702675	GUL SUMAIRA	M YOUNIS	40	Fail
1702676	SAJIDA BIBI	M KHAN	116	Fail
		JAN MOHD	156	52.00



ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following DM (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 with	Father's Name	Home Address	Place of Posting	Remarks
1	Naghma Zeb	Aurang Zeb	Perhinna	GGMS Karori	A/V/Post
2	Sumaira Naz	Ferdos	Ichrian	GGMS Sokal	A/V/Post
3	Nabeela Bibi	Rana Sarfraz	Mansehra	GGMS Madserian	A/V/Post
4	Asma Zeb	Aurag Zeb	Balakot	GGHS Ghanool	A/V/Post
5	Bibi Fatema	Gul Fam	Dhodial	GGMS Kothri	A/V/Post
6	Tayyuba Khan	R.Rustam Khan	Behali	GGMS Jisgran	A/V/Post
7	Anam Salim	M. Salim Khan	T.Sabir Shah	GGMS Mathra Jalgli	A/V/Post
8	Rubia Sabir	Sabir Hussain	Data	GGHS Kaghan	A/V/Post
9	Rashida Zeb	Aurang Zeb	Mansehra	GGMS Kamal Ban	A/V/Post
10	Nusrat Sardar	Ghulm Sarwar	Mansehra	GGMS Sinjli	A/V/Post
11	Javeria Bibi	M.Fiaz Khan	Balakot	GGMS Mohadari	A/V/Post

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.
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 and 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.

Attested
R. J. J. J.

P- (21)
Annex D

6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra) their services are liable.
7. ~~Issued resignation with documents is / are found fake or forged or without proper notice from either side in~~
9. Their services can be terminated at any time in case their performance is found unsatisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
11. They may not be handed over the charge if their age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in pervious post, their entitled 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.5385-5413 /Estt: (F)Appt:DM(F)/2011-12 Dated Mansehra the 18/5/ 2012

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshavar.
2. Director E&SE Department KPK Peshavar.
3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-19. Principal/Headmistresses School concerned.
20. PA to District Coordination Officer, Mansehra.
21. Budget & Accounts Officer, local office, Mansehra.
- 22-33. Candidates concerned.

Attested
[Signature]

[Signature]
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA



P- (22)
Annex "E"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Rashida Zeb D/O Aurang Zeb working as DM GGHS/GGMS/GGP Komal Ben 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. Rashida Zeb D/O Aurang Zeb GT/PET/TT D.A. GGHS/GGM-GGPS Komal Ben.

Attested
Rashida

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1756-65 /AE- 3 /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.

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

P-23
Annex F

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDORSEMENT NO.1756-65 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 & MARKED AS ANNEX "A").

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:-

Attached
Copy

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.

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 DM being a qualified teacher having DM Certificate with MA & B-Ed and ETA Test was conducted on 26/02/2011 and appellant appeared as a candidate and obtained 124 marks out of 300.
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 DM candidates for appointment against the vacant posts of DM.

4. That appointment order of the appellant was issued under endorsement No.5385-5413/Estt: Apptt: DM/2011-12/ dated 18/05/2012 and appellant was posted at GGMS Kamal ban (Copy attached).

5. That appellant continuously performing her duty without any break for more than 02 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. The appellant one of them to whom no show cause was issued.

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 , DM Course with MA B-Ed. All the degrees and certificates were also get verified from the concerned University / Board / Institutions by the District Officer (Female) Copy attached. Photo copy of the Service Book is also attached.

10. It is also pointed out that the candidates were appointed by the then EDO E&SE, on the bases of appeals, the then District Officer (F) E&SE has deleted/amended the merit list before the enquiry made by Muhammad Riaz Khan Swati, and a fresh merit list was prepared by the then DO (F) and signed again by the DSC committee the old one list not shown to the Enquiry officer.

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

Attested
Rajeev

served as regular teacher in Education Department for more than 2 years and 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 (The finding of the enquiry is attached)
- 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 appellants with all back benefits at the same station.

Rashida Zeb

Rashida Zeb D/O Aurang Zeb, Village
Dhangri Bala Tehsil & District Mansehra
CNIC No.13503-0540572-6

10/03/2015

Attached
Rashida Zeb

P- (26)
Annex E

VTCS		Sales Tax Invoice	
Acct / Coubon	Consignment Note No.	Org.	Dest.
	500		
Mode of Payment	Insured	Dimension	Wt (kgs)
<input type="checkbox"/> Cash <input type="checkbox"/> P.O. <input type="checkbox"/> C.O.D. <input type="checkbox"/> Account <input type="checkbox"/> Cash	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Call: 11-123-456 GST NO. 12-10-9908-002-73	Value		
From (Shipper)	To (Consignee)	Service Type	
		<input type="checkbox"/> Overnight <input type="checkbox"/> Holiday <input type="checkbox"/> Extra So. <input type="checkbox"/> Same Day <input type="checkbox"/> Second Day	
		Service Charges	
		Weight	
Phone	Phone	Handling	
		Other	
		GST	
		Insurance Premium	
<small>I warrant that I have read the terms and conditions on the reverse of this consignment note and that all details therein are true and correct. I further declare that the content of this consignment note is prima facie evidence of the terms and conditions of contract between express & VTCS (PVT) LTD.</small>		PICKUP INFORMATION Counter Code: _____ Date: _____ Time: _____	
Shipper's Signature		11317 100	
<small>ADVERT P.O. ACT 1994. TCS WILL NOT CARRY LETTER POSTCARDS.</small>		<small>Any suggestion/complaint about service may be mailed to PO Box # 2042, Karachi 75400.</small>	

Attested
Gulzar

NOTE: Come For training on 21-05-2015 at GMS Shohal Mazullah
At 08:00 am Positively

P- (27)
Annex = H

FORMAT FOR APPOINTMENT OF POLLING PERSONNEL
(Local Government Election)
KHYBER PAKHTUNKHWA
OFFICE OF THE RETURNING OFFICER

No & Name Of District Ward: 05 No & Name of Tehsil /Town Council
Ward : 05

No & Name of Village/Neighborhood Council: 20

Ref No: 3 Date: 12-05-2015

OFFICE MEMORANDUM

In pursuance of the provisions of Rules 11 Of the Khyber Pakhtunkhwa Local Councils (Conduct Of Elections) rules 2014. The following appointment of presiding officer/assistant presiding officers /polling officer are hereby made

Polling station fro:

District/Tehsil/Town Council Ward: Govt Primary School Chakka (Combined)

Number and Name of Polling Station

Village/Neighborhood Council: Ghaniya

(Number and Name of Polling Station)

To be held on the : 30-05-2015

Name & Designation Of Presiding Officer, Designated As Officer	Name & Designation of Assistant Presiding Officers (@3 Per P.B)	Name & Designation Of Polling Officer (@1 per P.B)	Name If Assistant Presiding As Presiding -
1 M. Wajid SST GHS Massa	1 S. Liaqat Ali Shah (PET) GMS Ochri Jarod	1 Sayyad Hussain (PST) GMPS Andhera Bela	S. Liaqat Ali Shah (PET) GMS Ochri Jarod
	2 Dedar Ahmed (TT) GMS Ochri Jarod	2 Muhammad Ashraf (PST) GFS Begna	
	3 Khaqa Ahmed (AT) GMS Ochri Jarod	3 Nazima Bibi (PST) GGPS Jamal Mari	
	4 Hamid Shaque (DM) Ochri Jarod	4 Shafta Gul (PST) GGPS Jalgaran	
	5 Nabeela Taj (TT) GGMS Josacha		
	6 Rasheed Zoh (DM) GGMS Kamal Ban		
	7 Madiha Yaqoob (AT) GGMS Kamal Ban		
	8 Fouzia Eibi (TT) GGMS Kamal Ban		

Reserve Staff:

Place: Balakot

Returning Officer
Tehsildar Balakot
Returning Officer For Wards
Hangrai, Sai Bani

NOTE: Come For training on 21-05-2015 at GMS Shohal Mazullah
At 08:00 am Positively

Shohal Mazullah

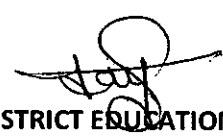
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.747/2015

Respectfully Shewth

1. That the services appeal No: 747/2015 in respect of MST: Rashida Zaib is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4040-45 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of DM (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 Rashida Zeb, DM at Government Girls Middle School Kamal Ben District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1756-65 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 ETEA application form was not found. However her name was found in the Merit list at S.No.09 under ETEA R.No. 1702652 with the remarks as "No Form" recorded on it in the remarks column. She was appointed as D.M vide a general order Endst: No. 5385-5413 dated 18/05/2012. Appeal may be accepted as she fulfilled the minimum prescribed qualification for the post.
2. Appeal may be accepted as her name existed in the ETEA merit list and in general appointment order. Her application form found missing due to negligence of office hands.

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. 1756-65 dated 03/03/2015 and reinstate Ms. Rashida Zeb DM at Government Girls Middle School Kamal Ben District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4040-45 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8 /2015

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

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Head Mistress Concerned.
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.




BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.747/2015

Respectfully Shewth

1. That the services appeal No: 747/2015 in respect of MST: Rashida Zaib is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4040-45 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of DM (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 Rashida Zeb, DM at Government Girls Middle School Kamal Ben District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1756-65 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 ETEA application form was not found. However her name was found in the Merit list at S.No.09 under ETEA R.No. 1702652 with the remarks as "No Form" recorded on it in the remarks column. She was appointed as D.M vide a general order Endst: No. 5385-5413 dated 18/05/2012. Appeal may be accepted as she fulfilled the minimum prescribed qualification for the post.
2. Appeal may be accepted as her name existed in the ETEA merit list and in general appointment order. Her application form found missing due to negligence of office hands.

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. 1756-65 dated 03/03/2015 and reinstate Ms. Rashida Zeb DM at Government Girls Middle School Kamal Ben District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4040-45 /F.No. 74 /Appeals Female MSR Dated Peshawar the 25/8 /2015

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

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Head Mistress Concerned.
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


25/8/15