


24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 18.3.2015 which was not responded and hence the instant service appeal on 13.7.2015.

That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.



Chairman
Camp Court A/Abad

20.10.2015

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

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

Dismissed as withdrawn.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


Chairman
Camp Court A/Abad.
20.10.15

ANNOUNCED
20.10.2015

Appellant Deposited
Security & Process Fee





Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 808/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.07.2015	<p>The appeal of Mst. Aisha Zmir presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	14-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 808/2015

Mst. Aisha Zamir d/o Sir Zamir W/O Ashfaq Saleem Khan (PST)
GGPS, bololian R/o Baffa Tehsil Oghi & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

INEX

S.No	Prescription of Document	Annexure	page
1	APPEAL		1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-27
4	Copy of appointment order and corrigendum	"C"	28
5	COPY OF SHOW CAUSE NOTICE	"D"	29-31
6	Copy of impugned dismissal order of appellant	"E"	32
7	Copy of departmental appeal /representation	"F"	33-35
8	Wakalatnama		

Dated: *10/7*/2015

Aisha Zamir
Appellant

Through

Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

①

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 808/2015

A.W.F. Province
Service Tribunal
Diary No. 838
Dated 13-07-2015

Mst. Aisha Zamir d/o Sir Zamir W/O Ashfaq Saleem Khan (PST)
GGPS, bololian R/o Baffa Tehsil Oghi & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

SERVICE APPEAL.

Service Appeal u/s 4 of KPK Service
Tribunal, 1974

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is as under:-

1. That, respondent No 3 announced the posts of PST in Dailly "The Aaj" dated 20/5/2011 for appointment of PST teachers. The Appellant fulfills the entire criteria which is sine qua non for appointment for the post of PST Teacher.

Copy of Advertisement is annexed as Annexure "A"

Filed to-day
13/7/15

2

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, F.A/F Sc PTC with extra qualification. **Copies of Documents/testimonial are annexed as Annexure "B"**

3. That, following this, the appellant was appointed as PST Teacher in respondents' Department on the basis of merits and was posted in GGPS vide appointment order endrst No 1417-26/ Mansehra Dated 26.06.2012. **Copy of appointment order and is annexed as Annexure "C"**.

4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 26.06.2012 onwards.

5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 1876-85/AE /ESTB on 3.3.2015.

6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi and DEO, Shamim Akhtar was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "that

3

appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes as against the recruitment rules". AS the inquiry committee did not recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of PST Teacher and appeared in ETTA of the merits list and thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of PST Teacher is taken into consideration and thereafter appointment made on merit.

Copy of Show Cause Notice is attached as Annexure "D"

8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order

④

endst. No 1876-85/AE /ESTB dated 03.03.2015. **Copy of impugned dismissal order of appellant is attached as annexure "E".**

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 18.3.2015. **Copy of departmental appeal /representation is attached as annexure "F"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

GROUND

- a. That, the appellant fulfilled the criteria of appointment as PST being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed on the merit list.12
- b. Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

- c. That, as per educational record annexed with the appeal, the appellant has been appointed as PST according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that there were vacant post of PST in the Union Council of the appellant but respondent No 3 did not appoint the appellant in her Union Council. However later on she was to be posted in her own Union Council. It is worth mentioning that there was no contesting candidate in the Union Council where the appellant was appointed as per law and procedure mentioned in the advertisement.
- d. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as PST. But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- e. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore,

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respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.

- f. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.
- g. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- h. That, right from the appointment of the appellant as PST in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- i. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of removal of Umar Kundi from service, the appellant

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

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

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 1876-85/AE /ESTB dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc: Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 10/11/2015

Aisha Zamir

Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

8

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst. Aisha Zamir d/o Sir Zamir W/O Ashfaq Saleem Khan (PST)
GGPS, bololian R/o Baffa Tehsil Oghi & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

APPLICATION FOR SUSPENSION
OF IMPUGNED ORDER NO 1876-
85/AE/ESTB AND GRANT OF STATUS
QUO TILL FINAL DISPOSAL OF THE
MAIN APPEAL .

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Mansehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

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

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

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

Dated: 10/7/2015

Aisha Zamir

Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst. Aisha Zamir d/o Sir Zamir W/O Ashfaq Saleem Khan (PST)
GGPS, bololian R/o Baffa Tehsil Oghi & District Mansehra

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

AFFIDAVIT

I, Mst. Aisha Zamir d/o Sir Zamir W/O Ashfaq Saleem Khan (PST) GGPS, bololian R/o Baffa Tehsil Oghi & District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 10/7/2015

Aisha Zamir
Deponent

Area B

P-11

Annex A

Attested

Muhammad Arshad Khan Tanoji
Advocate
Distt: Courts Abbottabad

سلسلہ	تاریخ	موضوع	مقام	تعداد	نوٹس
18	2-7-11	2-7-11	CGIS	CGIS	2-7-11
18	4-7-11	4-7-11	CGIS	CGIS	4-7-11
18	4-7-11	4-7-11	CGIS	CGIS	4-7-11
18	9-7-11	9-7-11	CGIS	CGIS	9-7-11
18	11-7-11	11-7-11	CGIS	CGIS	11-7-11
18	14-7-11	14-7-11	CGIS	CGIS	14-7-11
18	19-7-11	19-7-11	CGIS	CGIS	19-7-11

نوٹس: (1) تمام تقریباً حکومت چھوڑنے کے بعد چھوڑنے کے مطابق پندرہ دن اور گورنر کے دفتر کے پاس رہنے کے لئے (2) حکومتوں میں رہنے کے لئے کی وضاحت سے درخواست دینے کے بعد ہونگے۔ (3) مذکورہ افراد کے لئے دوسرے کوئی بھی نہیں ہے جس کے لئے کسی بھی طرح کی سہولت یا دیگر سہولت کی ضرورت نہیں ہے۔ (4) مذکورہ افراد کی موجودگی کو سہولت دینے کی ضرورت نہیں ہے۔ (5) Relaxation دیا جائے گا۔ (6) مذکورہ افراد کی ملازمت سرانجام دینے کے لئے انہیں کوئی بھی سہولت دینی نہیں ہے۔ (7) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (8) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (9) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (10) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (11) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (12) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (13) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (14) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (15) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (16) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (17) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (18) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (19) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔ (20) مذکورہ افراد کے لئے کوئی بھی سہولت دینی نہیں ہے۔

69704

Annex B-

P 12

GG. No.

Board of Intermediate & Secondary Education ABBOTTABAD

DETAILED MARKS CERTIFICATE Secondary School Certificate Examination

(GENERAL GROUP)

Session 19 98 (Annual/Supplementary)



Name Aisha Zamir

Father's Name Sarzar Mir

Roll No. 3918

	Marks Allotted	MARKS OBTAINED	
		in figure	in words
1. English	150	74	Four Hundred Eighty four
2. Urdu	150	101	
3. Islamiyat Comp:	75	60	
4. Pakistan Studies	75	35	
5. Gen. Mathematics	100	48	
6. General Science	100	38	
7. IS	100	69	
8. MBW	100	59	
Total	850	484-C	

This Certificate is issued errors and omission excepted.

Prepared by: [Signature]

Checked by: [Signature]

Date: 18 19 1998

Controller of Examinations
Board of Intermediate & Secondary Education
Abbottabad

Abbottabad

[Signature]
Muhammad Ahsan Uddin
Distt: Courts Abbottabad

P-13

Board of Intermediate & Secondary Education ABBOTTABAD

DETAILED MARKS CERTIFICATE Intermediate Examination (Humanities Group) Part - II



S. No: A

83617 Session 200 0 (Annual/Supplementary)

Name Aisha Zamir

Father's Name Sir Zamir Roll No. 2517

SUBJECT.	Subjects Marks	MARKS OBTAINED				REMARKS
		Part - I	Part - II	Total in		
				Figures	Words	
1. English	200			66		
2. Urdu	200			98		
3. Islamic Education	50			51		
4. Pakistan Studies	50			89		
5. IH	200			81	Five hundred & thirty two	
6. CIV	200			147		
7. IS	200					
Total	1100			532	D	

Note: Errors/Omissions excepted.

Date 200 8 JAN 2001

Prepared by: [Signature] Checked by: [Signature]

[Signature]
Controller of Examinations
Board of Intermediate & Secondary Education
Abbottabad

Attested

[Signature]
Muhamm...
Distt: Abbottabad

P-14

HAZARA UNIVERSITY, MANSEHRA, NWER, PAKISTAN

SNo: 2239



DETAILED MARKS CERTIFICATE
BA Supplementary 2005

Roll No: 04542 Registration No: 03-P-973
Student's Name: Aisha Zamir Father's Name: Sir Zamir
Institution/District: Manshra Part: First

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. English Compulsory	75	25	Twenty-Five	Pass
2. Islamiyat Compulsory	60	41	Forty-One	Pass
3. Urdu	75	26	Twenty-Six	Pass
Islamic Studies	75	30	Thirty	Pass
Total	285	122		
Percentage	42.81	%		



Prepared by: M. Anwar Chohan
Checked by: [Signature]

[Signature]

Controller Examinations
Hazara University, Manshra
December 25, 2005

Attested

[Signature]
Manshra

P-15

HAZARA UNIVERSITY MANSEHRA, NWFP, PAKISTAN

SNo: 3099



DETAILED MARKS CERTIFICATE

BA Supplementary 2004

Roll No: 06366

Registration No: 03-P-973

Student's Name: Aisha Zamir

Father's Name: Sir Zamir

Institution/District: Mansehra

Part: Second

Course Name	Maximum Marks	Marks Obtained	Marks In Words	Remarks
1. Part I Marks (S) 05	285	122	One Hundred & Twenty-Two	Pass
2. Islamic Studies	75	32	Fifty-Two	Pass
3. English Compulsory	75	26	Twenty-Six	Pass
4. Urdu	75	25	Twenty-Five	Pass
5. Pakistan Studies	40	26	Twenty-Six	Pass
Total	550	251		
Percentage		45.64 %		
Division		Second		

Prepared by: [Signature]
Checked by: [Signature]

[Signature]
Controller Examinations
Hazara University, Mansehra
February 5, 2005

Altered

[Signature]
Muhammad Arshad Khan Tanoli
4000106
Distt: Courts Abbottabad

P-16

SNo: 3056



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL)
ANNUAL EXAMINATION 2012

Roll No: 51842

Reg No: 03-P-973

Name: Aisha Zamir

F/ Name: Sir Zamir

Institution/ MANSEHRA

Subject: Islamiyat

District _____

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks	
	TH	PR	TH	PR				
MA Previous Marks	500				265	TWO HUNDRED SIXTY-FIVE		
(Al-Qura'an) Translation 2nd Half & Commentary alongwith Grammar	100		58		58	FIFTY-EIGHT	Pass	
Principles of Islamic Jurisprudence	100		40		40	FORTY	Pass	
Islam & other World Religions	100		78		78	SEVENTY-EIGHT	Pass	
Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100		53		53	FIFTY-THREE	Pass	
Islamic Economics / Islamic Politics / Islam & Science	100		52		52	FIFTY-TWO	Pass	
General Viva Voce	100		45		45	FORTY-FIVE	Pass	
Total:					1100			
Percentage:					53.73			
Division:					SECOND			
					591	FIVE HUNDRED NINETY-ONE		

Print Date: 15-01-2013

Checked By: _____

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issue date of this certificate.

[Signature]

Controller Examinations
Hazara University, Mansehra
January 14, 2013

[Signature]

[Signature]
Multi...
Dist...
5000000000



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SN: 0907

DETAILED MARKS CERTIFICATE MASTER OF ARTS (PREVIOUS) ANNUAL EXAMINATION 2011

Roll No: 11094

Reg No: 03-P-973

Name: Aisha Zamir

Father's Name: Sir Zamir

Institution / MANSEHRA

Subject: Islamiyat

District _____

Course Title:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
(Al-Qura'an) Translation 1st Half Commentator & Principles of Tafseer	100		40		40	FORTY	Pass
Hadith and Principles of Hadith	100		42		42	FORTY-TWO	Pass
Islamic Jurisprudence (Text)	100		67		67	SIXTY-SEVEN	Pass
Seer'at un Nabi (SAWS) & History of Islam	100		64		64	SIXTY-FOUR	Pass
'Arabic Grammar' and Literature	100		52		52	FIFTY-TWO	Pass
Total:					265	TWO HUNDRED, SIXTY-FIVE	

Percentage: 53.00

Print-Date: 31-01-2012

Checked By: _____

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

[Signature]
Controller Examinations
Hazara University, Mansehra
January 16, 2012

[Signature]
Attested
[Signature]
Muzaffar Hussain
40000000

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



PROVISIONAL RESULT CARD

Serial No. 206198

Name: AISHA ZAMIR
 Father's Name: SAR ZAMIR
 Address: VILL. P/O BAFFA MOH. DANKOPA
 LANGRIAL BAFFA KHURD

Roll No. AC618769
 Registration No. 09NMA00443
 Final Semester AUT- 2009

Tehsil: MANSEHRA
 District: MANSEHRA

has successfully completed PRIMARY TEACHING CERTIFICATE

P-18

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 09	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	52
SPR- 09	0614	EDUCATIONAL PSYCHOLOGY	100	52
SPR- 09	0613	PRINCIPLES OF EDUCATION	100	63
SPR- 09	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	62
AUT- 09	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	66
AUT- 09	0618	TEACHING OF MATHEMATICS	100	59
AUT- 09	0617	TEACHING OF URDU	100	55
AUT- 09	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	82
AUT- 09	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	62

Attested

Muhar...

CREDITS: 5

Total Marks / Obtained 900 / 553

Result Declared on SEPTEMBER 17, 2010

Percentage / Grade 61 B

Date of issue SEPTEMBER 29, 2010

Controller of Examinations

Disclaimer:

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

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No.

413894

PROVISIONAL RESULT CARD

Name: AISHA ZAMIR
 Father's Name: SIR ZAMIR
 Address: C/O ABDUL BARI VILL BAZARGAI P/O JEESOL

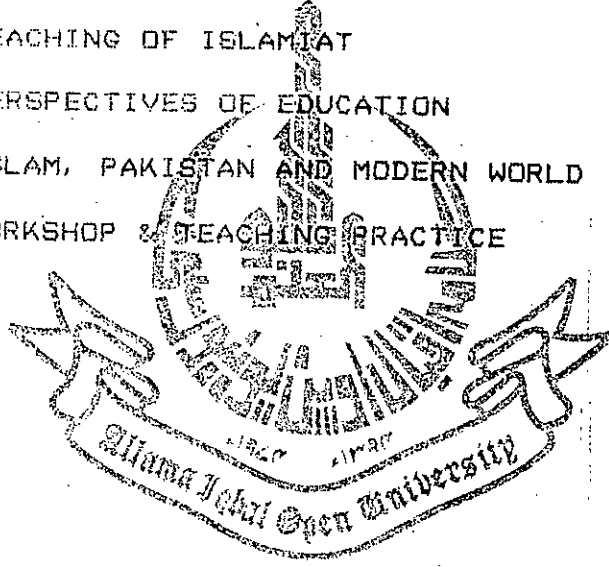
Roll No. AJ659380
 Registration No. 11NMA00312
 Final Semester SPR-2012

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

P-19

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 11	0513	SCHOOL ORGANIZATION	100	55
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	56
SPR- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	66
SPR- 11	0651	ENGLISH (COMPULSORY)	100	55
AUT- 11	0517	TEACHING OF PAKISTAN STUDIES	100	59
AUT- 11	0654	TEACHING OF ISLAMICAT	100	59
SPR- 12	0512	PERSPECTIVES OF EDUCATION	100	57
SPR- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	64
SPR- 12	0655	WORKSHOP & TEACHING PRACTICE	100	82



Muhamad Arshad
 Controller of Examinations

CREDITS: 6

Total Marks / Obtained

900 / 553

Result Declared on JANUARY 04, 2013

Percentage / Grade

61 B

Date of issue JANUARY 18, 2013

Controller of Examinations

Disclaimer:

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

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DOMICILE CERTIFICATE

I declare that I am born of parents who are permanently domiciled in N.W.F. Province having been born in this Province.

I was born at BAFFA. Tehsil MANSEHRA.

District MANSEHRA.

I passed Primary Examination from MOHD:ALI MODEL PUBLIC School BAFFA.

Resident of BAFFA (KHURD)

Tehsil MANSEHRA.

District MANSEHRA.

Sd/ Aisha Zami Dated _____

Pursuance to the declaration dated _____

Filed by AISHA ZAMIR D/O SIR ZAMIR.

Tribes SWATI Section YOUSUF ZAI Sub Section YOUSUF ZAI.

Tehsil MANSEHRA. District MANSEHRA.

to the effect that he had been born of parents who are permanently domiciled in N.W.F. Province having been born within it.

VERIFICATION CERTIFICATE

I have satisfied myself from personal/my own knowledge the above declaration is true and certify accordingly.

Given under my hand and the seal of Court this _____
02 day of 09 1998

MAGISTRATE 1ST CLASS _____

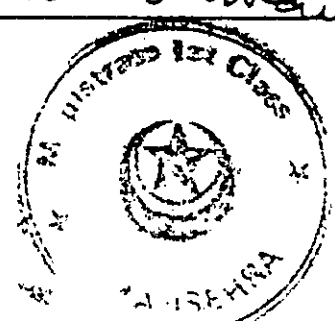
A. J. J. J. J.

Countersigned

4857 Dated 03/9/98
COUNTERSIGNED

DISTRICT MAGISTRATE

Attested
Muhammad



Ariz Stationery Mart Baffa.

Muhamm

محمد علی صاحب

363
457

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It is certified that Miss Aisha Zamir
D/o Sir Zamir Passed the Primary Examination
from M. Ali Model School Balga.

Farzana Akhtar
PRINCIPAL
M. ALI MODEL SCHOOL
BALGA

صاحب عالی

سما عا شہ صغیرہ فقیرہ سر صغیرہ قوم سواتی ساکن لہ کھیل و منگ مال سیدہ کی
آباد اجداد سے پیدا ہوئی در الٹی راجنہ سے۔ منبر شہ کا والد در صدر لودھیان زمین
سے لہ لہائی بھاری بھول سال 1949 سے 1949 سے کسانہ میں 243
میں ملک در 2 سے الٹ

26/3/98

2/9/98

~~Signature~~

Tehsildar Muzsikhan
2-9-98

Amir C.

Amir C.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

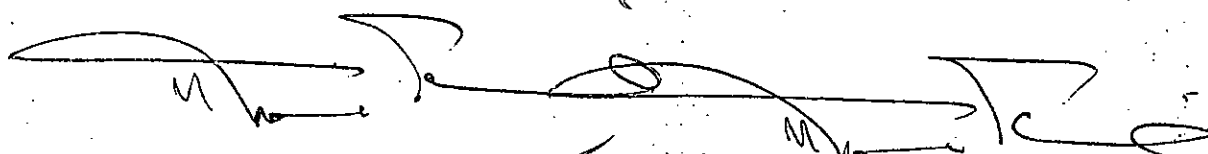
ORDER

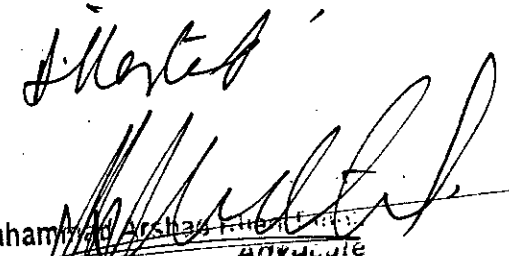
P-28

In continuation of this office Endst No. 5360-5384 /Estt: (F)Apptt: PST (F)/2011-12 Dated Mansehra the 18th May, 2012 and on the acceptance of the appeal by the competent authority Miss: Ashia Zameer D/O Sar Zameer Khan R/O Baffa is hereby appointed as a Primary School Teacher **PST (Female)** against the vacant post at GGPS GGPS.Balolian in **BPS 7 @ Rs.5800-320-15400** plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she 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 he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
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)
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.


EXECUTIVE DISTRICT OFFICER
E&S EDUCATION
MANSEHRA


Muhammad Arshad
Advocate
Distt: Courts Abbottabad

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~~Annex~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

No. 7930/AB-17(P)

Dated 01/10/2014

SHOW CAUSE NOTICE.

Annex D

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Ayisha Zameer, PTC GGPS Balolian Mansehra as follows:

1: You were illegally appointed as PTC at GGPS Balolian, vide defunct Executive District Education Officer (E&SE) Mansehra Endst: No. 1417-26 /Aptt./PST/F/ dated 26.2.2012, whereas you were stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidate for said post through EATA. Your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25.8.2014. Moreover the then EDO (E&SE) removed from Government Service in connection with all such bogus appointment including you made by him.

2. Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defense before the inquiry committee:-

I am satisfied that you have committed the following acts/omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- b) inflicted huge financial losses to the Govt: Treasury receiving pay and result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating / cancelling the facts for unlawful appointment with collusion of then EDO.

1. As a result thereof, I as competent authority, have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.

2. You are, hereby, required to show cause as to why the aforesaid Penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

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

4. A copy of relative page of the finding of the inquiry committee is enclosed

Attested

Muhammad Saad Anwar Jassil
Advocate
Distt: Courts Abbottabad

Mst. Ayisha Zameer, PST
GGPS Balolian.

COMPETENT AUTHORITY

[Signature]

District Education Officer
(Female) Mansehra

REPLY TO SHOW CAUSE NOTICE NO 7930/AE III-F

DATED 01/10/2014

Annex (F)

P-30

I. That the Para No 01 of the show cause Notice is legally and factually in correct. The petitioner having requisite qualification applied for the post of PST union council Baffa as par advertisement issue by the competent authority, the petitioner appeared in EATA test under roll No 1700094 securing 120 marks percentage 40.00. In the merit list petitioner was wrongly placed at serial no 3 because the other candidate Niaz Gul R/O Union council Inyat Abad was wrongly placed in union council Baffa and was illegally and against the recruitment policy appointed at GGPS Baffa Khurd.

The petitioner was not stranger to recruitment process. copy of EATA result is Annexed as Annexure A.

The illegal appointment of Niaz Gul at GGPS Baffa Khurd was impugned by petitioner by moving an application on the ground that the Niaz Gul not having the Domicile of union council Baffa having the domicile of union council Inyat Abad and has wrongly been placed second in the merit list. The application of the petitioner was accepted due to aforesaid mentioned cogent grounds and the petitioner was appointed as PST (female) against the vacant post at GGPS Balolian and later on transfer to GGPS Baffa Khurd union council Baffa. Application to the concerned authority is annexed as annexure B.

II. That the para No 02 of notice is incorrect. That the findings recorded by inquiry officer are perverse and are not supported by any legal evidence at all the findings are not sustainable numbers of inconsistencies and contradictions existed between the finding of inquiry officer. The inquiry was not conducted in accordance with the law.

Attested

Muhammad Arshad Ali
Post: Courts Abottabad

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- a) Para a is incorrect the petitioner is not guilty of misconduct and dishonesty. The appointment of petitioner was made in accordance with the law.
- b) Para b incorrect. No huge financial losses caused to Govt: Treasury. The appointment of the petitioner was legal therefor entitled for all the benefits.
- c) Para c incorrect. The fundamental and legitimate right of the petitioner was denied by the appointing authority which was later on rectified by the competent authority.

The petitioner having requisite qualification and illegibility was rightly in accordance with the law appointed on the post of PST. Show cause notice issued against the petitioner is ab-initio void based on malafide and not tenable in the eye of law.

The petitioner desired to be heard in person.

It is therefore humbly prayed that the show cause notice may kindly be canceled and the petitioner may graciously be discharged from the charge.

Dated: 20.10.2014

Aisha Zamiir
Mst. Ayisha Zameer,
PTC GGPS Maswal
Manshra

Attested

Muhammad Aishah Khan Tanoli
Advocate
Distt: Courts Manshra

Annex E



[Handwritten signature]

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Ayesha Jameer D/O _____ working as PSI GGHS/GGMS/GGP Balochian 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. Ayesha Jameer D/O _____ CT/PET/TT PSI GGHS/GGM GGPS Balochian.

[Handwritten signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1876-85 /AE-_____/Estab: dated 03/07 /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.

Attested

[Handwritten signature]

[Handwritten signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Mst: _____
Dist: _____

To

The Director,
Elementary & Secondary Education,
KPK Peshawar.

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Amex F

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDST NO 1876-85/AE-I/Estab: DATED 03-03-2015 WHEREBY MAJOR PANALTY OF DISMISSAL FROM GOVT SERVICE WAS IMPOSED UPON THE APPELLANT WITHOUT LAWFUL AUTHORITY (COPY OF IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS ANNEX "A")

PRAYER: IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM THE DATE OF ITS ISSUANE DECLARING THE SAME WITHOUT LAWFUL AUTHORITY CONTRADUCTORY TO THE RECRUITMENT POLLICY & 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.

- (I) That the then EDO (E&SE) Mansehra invited application for recruitment of teachers of various cadres in Distt : Mansehra through advertisement published in daily AJJ (copy attached and marked as Annex "B")
- (II) That as per procedure appellant applied for the post of PST .ETA test was conducted on 06-06-2011 and appellant appeared as a candidate under Roll No 1700094 and obtained 120 marks out of 300. (copy attached and marked as Annex "C")
- (III) That the then EDO conducted interview and scrutinized the documents of the candidates and merit list of the candidate was displayed for receiving objections.
- (IV) That appointment order of the appellant was issued under Edstt No 1417-26 dated 26-06-2012 and Appellant was posted against the post of PST at GGPS BALOLIAN Mansehra. (copy attached and marked as Annex "D")
- (V) That appellant continuously performing her duty without any break for the last 02 Years & 09 Months while she received a show cause notice whereby allegations were leveled against the appellant based on concoction and concealment of facts. The same are reproduced as below.

"YOU WERE ILLEGALLY APPOINTED AS "PST" AT GGPS BALOLIAN MANSEHRA VIDE DEFUNCT EXECUTIVE DISTRICT OFFICER (E & SE) MANSEHRA ENDSTT NO 1417-26/APTT PST-(F) DATED 26-06-2012 WHERE YOU WERE STRANGER FOR RECRUITMENT PROCESS INITIATED THROUGH ETA ACCEPTANCE OF YOUR APPEAL AND SUBSEQUENTLY YOUR APPOINTMENT ORDER WAS THE RESULT OF MISUSE OF AUTHORITY BY THE THEN EDO ACCORDING TO HIS SWEET WILL AND WISHES AGAINST THE RECRUITMENT RULES" (Copy attached and marked

as Annex "E")

Attest
Multi
Distt. Education Officer
Tandli
Distt. Education Officer
Distt. Education Officer

- (VI) That a reply was submitted in response to show cause notice whereas appellant adopted continuation that she was appointed after due recruitment process (copy attached and marked as Annex "F")
- (VII) That appellant received impugned order dated 03-03-2015 whereas the major penalty of dismissal from service has been imposed upon the appellant.

Sir,

(a) Appellant was appointed after due process of recruitment through ETA test. The appellant served for a period of 02 Years and 09 Months without any break to the entire satisfaction of department.

(b) No inquiry was conducted or initiated. No opportunity of defense offered. No personal hearing was made. How the authority passed the order in the light of E & D rules and under what charges/evidence imposed such a harsh punishment of dismissal from service.

It is stated that no such recommendation was made by the committee who was constituted to conduct inquiry against the then EDO.

In the light of above facts You are requested to set aside the impugned notification of dismissal from service that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station who was appointed against the post of PST in result of completion of due recruitment process on merit basis.

Dated: 18/03/2015

Attested

Yours Faithfully
 (Appellant)
 Aisha Zamir
 AISHA ZAMIR
 GGPS MASWAL Mansehra

[Signature]
 Muharraf
 Distt: Courts Abbottabad

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IRREGULARITIES NOTED IN UNION COUNCIL-WISE APPOINTMENTS

NAME OF UC	NAME OF CANDIDATE	Points raised by committee	Reply of Mr. Umar Khan
UC Baffa	Niaz Gul R/O UC Inyatabad. Sobia D/O Noor Hussain <u>Ayisha Zameer,</u>	Appointed at GGPS Baffa Khurd. Her order was withdrawn on the appeal of Ayisha Zameer another candidate of UC Baffa. Her order was withdrawn Vide No.611-17/13.6.2012. Appointed at S.No. 2 at GGPS Kando Gali UC Chattar Plain and not in her own UC Baffa. She was at S.No 3 of merit list. Her appointment order was issued on her appeal regarding illegal appointment of Niaz Gul in UC Baffa. Aysihā Zameer order on the acceptance of appeal was issued under endst No. 1417-26 dated 26.6.2012. Appointed at GGPS Balolian in other UC Karori.	The appeal of Ayisha Zameer was accepted on the grounds pointed out in her appeal after proper verification of record that Niaz gul belonged to other UC. The post PST was filled in UC Baffa by the transfer, hence she was accommodated in UC Chattar Palin being eligible for appointment on merit. <u>As against Niaz Gul UC Baffa.</u>
UC Behali	Munazzah Daud	Appointed at S.No. 3 at GGPS Ashauual UC Hilkot and not in her own UC (Behali).	The post was filled in UC Behali by the transfer, hence she was accommodated in UC Hil Kot being eligible for appointment on merit.
UC Kathal	Shaista jabeen r/o UC katal	At S.No 6 of appointment order, appointed at GGPS Chandni UC Battal.No post was vacant in her UC.	The post was filled in UC Kathai by the transfer, hence she was accommodated in UC Battal being eligible for appointment on merit.
UC Garhi Habibullah	Nadia Ashraf	At S.No 8 of appointment order appointed at GGPS Dannah Ganila UC Sath Bani and not in her own UC Garhi Habibullah. Two posts were lying vacant in UC Garhi Habibullah at GGPS Battang but she was appointed in other UC	She was stands at S.No. 01 of the merit UC Ghari Habibullah. No vacant post in UC Ghari Habibullah was available while in adjacent UC Satbani no candidate was available. Hence she was appointed in adjacent UC as per policy.

Attended
[Signature]
Minam
Dist. Courts Abbottabad

[Signature]

قیمتی

کورٹ فیس

وکالت نامہ

بعدالت KPI۲ سرسبز سٹریٹ گلشن آباد
عنوان: عالت نمبر PST بنام گنہگار KPK انجینئر
منجانب: ایڈووکیٹ
نوعیت مقدمہ: ایس

باعث تحریر آنکہ

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

محمد ارشد خان منولی ایڈووکیٹ حاکم کورٹ ایس ایڈووکیٹ

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

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 10/7/2015

بمقام: ایڈووکیٹ ایڈووکیٹ

Attested Receipt

M. Arshad Khan Tanoli
Adv High Court Atd

Aisha Zaidi

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.808/2015

Respectfully Shewth

1. That the services appeal No: 808/2015 in respect of MST: Aisha Zamir is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4136-41/F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of PST (Notification attached)

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


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

شماره - ۱۰۰

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

NOTIFICATION.

WHEREAS, Mst. Aisha Zameer, PST at Government Girls Primary School Balolian District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1876-85 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

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

1. She belongs to U/C Baffa at S. No of 03 of Merit list and there were 02 posts lying vacant and 02 candidates at S.No.1 & 2 were appointed. The order of S.No.01 was withdrawn due to the wrong posting in the said U/C. She deserved to be appointed against the post vacated as a result of withdrawal of Bibi Niaz Gul PST in the same U/C at S. No. 01. She was appointed through a single/ Individual order vide Endst: No.1417-26 dated 26/06/2012 at GGPS Balolian U/C Karori instead of her own U/C.
2. ~~Appeal may be accepted as she was required to be appointed against the post vacated as a result of withdrawal of Bibi Niaz Gul PST (belongs to other U/C).~~

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. 1876-85 dated 03/03/2015 and reinstate Ms. Aisha Zameer, PST at Government Girls Primary School Balolian District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4136-41 /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. Sub Divisional Education Officer (Female) Mansehra
3. District Accounts Officer Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

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