BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 146 /2023

Qudsia D/O Raza Khan R/O Mohallah Khan Khel Post Office Khas Jehangira, Tehsil Lahor, District Swabi.....**(Appellant)**

VERSUS

1. Govt: of KPK through Secretary Elementary and Secondary Education at Block A, 3rd Floor, Building A, Civil Secretariat Peshawar.
2. Director General, Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar at Hashtnagri Chowk near Qila Bala Hisar Peshawar.(No such like Post exist in Elementary & Secondary Education KPK)
3. Director of Education KP, at Hashtnagri Chowk near Qila Bala Hisar Peshawar.
4. District Education Officer (Female) Swabi .....**(Respondents)**

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DISTRICT EDUCATION OFFICER
(FEMALE) SWABI
District Edu. Officer
(Female) Swabi

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 146 /2023

01

Qudsia D/O Raza Khan R/O Mohallah Khan Khel Post Office Khas Jehangira, Tehsil Lahor, District Swabi.....**(Appellant)**

VERSUS

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4. District Education Officer (Female) Swabi .....**(Respondents)**

PARA WISE COMMENTS ON BEHALF OF THE RESPONDENTS NO.1 TO 4

Respectfully Sheweth,

PRELIMINARY OBJECTIONS.

1. That the matter is of the validity/non validity of initial appointment order, which is beyond the scope and ambit of the Honorable Service Tribunal, hence the appeal is not maintainable.

2. That the flying, fraudulent, fake, bogus and manipulated appointment order of the appellant was also on contract basis, therefore excluded from the definition of civil servant, hence, the service appeal is not maintainable.

3. That the appellant flying and fraudulent appointment order was shown on contract basis and was at same capacity till disown of her appointment order, hence, the service appeal is not maintainable.

4. That the service appeal is wrong, baseless and not maintainable, it shows no strong cause to be taken for adjudication, therefore, the same service appeal is liable to be rejected/ dismissed.

5. That the service appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory cost in favour of respondents.

6. That no constitutional or legal right of the appellant has been violated, therefore, the appellant is not entitled to invoke the constitutional jurisdiction of this honorable Service Tribunal under Article 212 of the constitution of Pakistan.

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7. That the appellant has not come to the Court/Tribunal with clean hands. (02)

8. That the appellant has concealed the material facts from this Honorable Tribunal.

9. That the appeal is bad for misjoinder and non-joinder of the necessary party.

10. That the appellant has filed the instant appeal just to pressurize the respondents.

11. That the appellant has no cause of action to file the instant appeal.

12. That the appeal is not maintainable in the eye of law.

13. That the instant appeal is not maintainable in the present form and also in the present circumstances of the issue.

FACTS:-

1. The para relates to the residence of the appellant, which does not create any right of recruitment without applying to the advertised posts and participation in the due process and procedure set for the appointment. It also cannot validate any illegal order, hence needs no comments.
2. That the document annexed as B at page 13 with memo of appeal transpires, she obtained her bachelors in economics session 2014-18 with a result declaration date has 25.06.2018 astonishingly this page is the same in all entries with page 12 of the appellant in connected service appeal no 147/2023. The only change in both the documents is the entry of name and father name, which is a clear indication that her qualification is not bachelors in economic. It is pertinent to mention that her claim of qualification at different occasions is also different. The unqualified candidate has no right to be appointed, hence needs no further comments.
3. That the fake, flying, fraudulent, bogus and manipulated appointment order of Qudsia CT Endstt. No 1533-40/DA. I/App/CT-F/ 2020 Dated 07/07/2020 annexed as C at page 14 to 15 with memo of appeal. In fact, in dairy and dispatch register 1533– 40 as above indicates the original five leftover CT candidates. This is a fake, flying, fraudulent manipulated order and was shown made on contract basis. The name of the appellant neither included in tentative nor in final merit list. Verification of documents from the concerned institution has not been obtained. This appointment order like other fake and flying appointments has been done through scanning and other computer techniques. The appellant is not a civil servant at all. Thus appeal to the service tribunal by anyone not falling within the definition of civil servant is impliedly barred by law. The appeal is not meaningful due to lack of jurisdiction, hence need no further comments. This only one ground is much sufficient to dismiss the appeal in hand with special compensatory cost in favor of respondents. Reliance is placed on the judgment of this honourable Tribunal in SA No 1056/2017 dated 18.06.2021 and SA No. 7763/2021 dated 29.09.2022 annexed as A and B.

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4. That the appointment was non-meritorious void, illegal, unlawful, flying, fraudulent and manipulated order, therefore, medical fitness certificate merely apart of accounting procedure, not a step that could confer any vested right on the contract servant in the context of her

appointment nor for that it could validate any illegal order. Reliance is placed on 1989 PLC (C.S) 622.

5. That the appellant neither included in tentative nor in the final merit list. Thus, it is crystal clear she was not recommended by the departmental selection committee (DSC) at all. The approach of the appellant to any court would with unclean hands if she has got her appointment through back door. It is settled by now that if a post had not been advertised, appointment again such post, even if based on recommendation of selection board, would be void, because advertising a post was basis on which merit system stood. Reliance is placed on 2001 PLC (C.S) 121 and 2000 PLC. (C.S) 155. No one can neither been appointed over and above the advertise post nor against other quota. This flying, fraudulent, fake, and bogus order was also over and above advertised posts during the period.
6. That the matter belongs to flying, fake, fraudulent, bogus and manipulated appointment orders of seven (07) female teachers of various cadres each case has its own perspective and ugly background. A tricky and cunning mafia was at the back of all these flying, fraudulent, fake bogus and manipulated orders. These holder of flying, fraudulent, bogus and manipulated order teachers are the relatives of junior clerks of this department or personnel of police department. The DEO (F) Swabi has requested the DPO Swabi for lodging an FIR against the mafia.
7. That there are two pay releases on record in the first Pay release vide Endst No: 2070-G/ Appt. of CT/ Pay release dated Swabi the 08.09.2020, reflects name of Qudsia CT and Saba Gul CT. Astonishingly in dairy and dispatch register this number indicates DA-II CT (IT). In second Pay release vide Enst No. 2239/ Apptt of CT/ F/ pay release dated Swabi the 28/09/2020 reflects Saba Gul CT only, from GGHSS Jalbai. This is a crazy contradiction. These two pay release are manipulated and bogus. These orders were illegal, unlawful, flying, fraudulent, fake, bogus and manipulated, therefore the pay release order if it would genuine is not a step that could consider any vested right on contract servant in the context of her appointment nor that its could validate any illegal order. The appellant had got the pay release order through the back door. The base provided for pay release by the appellant was illegal. Observing all codal formalities and due verification for pay release is quietly out of the question.
8. That the appellant appointment, as well as pay release order, were non-meritorious, void, illegal, unlawful, flying, fraudulent, fake, bogus and manipulated order, therefore performing her duties is not a step that could confer any vested right on the contract servant in the context of her appointment nor for that, it could validate any illegal order.
9. That the appellant's appointment was flying, fraudulent, illegal, fake, and manipulated, therefore, again adjustment in another school is not a step that could confer any vested right on the contract servant in the context of her appointment nor for that it could validate any illegal order.
10. Incorrect, hence denied. The appellant has neither been appointed accordingly nor assurance was given to be regularized. The appointment order had got through back door, it was flying, fraudulent, fake, bogus and manipulated. This appointment order had no legal effect. The respondent No.4 rightly issued a notification number 1914 – 1919/file, dated 5-08-2022

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11. declared and disowned the appointment order of the appellant flying, fake, and bogus, after observing all the codel formalities. The rule of locus poenitentiae is not applicable in the instant case because the base provided for appointment order by the appellant is illegal, "rule of locus poenitentiae (power to recall) will not be applicable in case, in which basic order is illegal". Same is reported in NLR 2005 TD (service) 286:2002 PLC (CS)1093, 2000 PLC (CS) 1260, 2000 SCMR 9027, PLD2000, LAH 253, 1999 SCMR 2089, 1998 PLC(CS)389. Locus poenitentiae will not be attracted when employee got the appointments through back doors. Reliance is placed on 2001 PLC (CS) 121 and 2000 PLC (CS) 1172. No perpetual right could be gain on the basis of such illegal order. Principle of Locus poenitentiae could not apply to such case. Same is reported in 2005 SCMR 1040. Moreover, ill-gotten gains cannot be made a precedent. The act of regularization notified on 20-09-2022 while the flying, fake and bogus contract appointment order was disowned on 05.08.2022 much prior than the notification. Thus it is a clear indication that her appointment was not on regular basis. This is enough evidence to prove that she was not a civil servant. Thus under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, this appeal is not maintainable at all. Enquiry report along with relevant documents annexed as C.

12. That the appellant appointment was flying, fraudulent, illegal, fake and manipulated, therefore, performing her duty, is not a step that could confer any vested right on the contract servant in the context of her appointment nor for that it could validate any illegal order.

13. That the appellant appointment was flying, fraudulent, illegal, fake and manipulated, therefore, performing her duty and receiving salaries, is not a step that could confer any vested right on the contract servant in the context of her appointment nor for that it could validate any illegal order.

14. That the appellant appointment was flying, fraudulent, illegal, fake and manipulated, therefore, performing her duty at polling station as a assistant presiding officer during the local government election, is not a step that could confer any vested right on the contract servant in the context of her appointment nor for that it could validate any illegal order.

15. That the employee had got the appointment through back doors. The disown order of the appellant is a speaking order. The competent authority i.e DEO(Female) Swabi (Ms: Sofia Tabassum) ordered enquiry vide office Endst: No.462 dated 14-02-2022 and Endst: No. 658-61 dated 04-03-2022. The committee carried out a comprehensive enquiry, wherein a full opportunity of defense, without any prejudice and fear of reprisal was provided to the appellant. The committee submitted its report to the competent authority, wherein the committee declared the appointment order as flying, fake, fraudulent, bogus and manipulated. The competent authority i.e DEO(F) Swabi submitted a report regarding appointment on extraneous grounds to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, consequent upon which vide Endst: No.789-92 / A-23/complaint/Mardan vol-II/2021 dated Peshawar, Mr. Sharif Gul Principal BPS-19, who conducted his enquiry, wherein he affirmed and agreed with the enquiry report already conducted by the DEO(F) Swabi, submitted to the Director E&SE KP Peshawar vide No.116 dated 29-06-2022. The Director Elementary &

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Secondary Education KP Peshawar directed the DEO(F) Swabi to disown the appointment order of fake and bogus teachers vide No.1577/A-23/MS/complaint/Mardan/Vol-II/2021/DC.

16. That the initial appointment order was non meritorious, void, illegal, unlawful, flying, fraudulent, fake, bogus and manipulated. Therefore, the notification bearing Endst: No.1902-1907/file, dated 05-08-2022 passed by the District Education Officer (Female) Swabi is legal in accordance with law, rules, policy and facts.
17. There the appellant had got the appointment order through back doors. It was declared flying, fake and bogus by the competent authority after conduction of enquiry. The appointment order of the appellant was illegal and in violation of rules and regulations, it is not necessary to afford opportunity of hearing before setting aside illegal order, even otherwise illegal appointment cannot be restored. Reliance is placed on 2001 PLC (C.S) 105.
18. That the employee had got the appointment through back doors, disown notification bearing Endst. No 1902-1907/file, dated 05/08/2022 of the appellant is a speaking notification. The competent authority issued this notification after observing all the codel formalities. She was provided ample opportunities to produce evidence to validate her appointment before the stoppage of pay and disown her appointment order but she badly failed to do so. she is not an aggrieved person at all. Therefore, she has no cause of action to file the instant appeal and appeal in hand is liable to be dismissed on the above facts and circumstances.

GROUNDS:

A. Incorrect, hence strongly denied. The employee got the appointment through back door. Enquiry was conducted and in the light of enquiry committee recommendations, the competent authority declared the appointment order of the appellant is flying, fake and bogus.
B. Incorrect, hence denied. Enquiry has been conducted. The appointment order of the appellant was illegal and violation of rules and regulations, it is not necessary to afford opportunity of hearing before setting aside illegal order, even otherwise illegal appointment cannot be restored. Reliance is placed on 2001 PLC (C.S)105. The Enquiry conducted by appellate authority through Mr. Sharif Gul Principal BPS-19 wherein he affirmed and agreed with the enquiry report already conducted by the DEO(F) Swabi, submitted to the Director Elementary and Secondary Education Khyber Pukhtunkhwa Peshawar vide No. 116 dated 29-06-2022.
C. Incorrect, hence denied. Enquiry has been conducted. The appointment order of the appellant was illegal and violation of rules and regulations, it is not necessary to afford opportunity of hearing before setting aside illegal order, even otherwise illegal appointment cannot be restored. Reliance is placed on 2001 PLC (C.S)105. The Enquiry conducted by appellate authority through Mr. Sharif Gul Principal BPS-19 wherein he affirmed and agreed with the enquiry report already conducted by the DEO(F) Swabi, submitted to the Director Elementary and Secondary Education Khyber Pukhtunkhwa Peshawar vide No.

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116 dated 29-06-2022. The most interesting fact in the case in hand is that, her name neither included in tentative nor in final merit list.

D. Incorrect, hence denied. The matter belongs to flying, fake and bogus appointment order of seven (07) female teachers of various cadres, each case has its own perspective and ugly background. A tricky and cunning mafia is at the back of all these flying, fake and bogus appointment orders. The holders of flying, fake and bogus order teachers are relatives of Junior Clerk of this department or personnel of Police Department. The DEO (female) Swabi has requested to DPO Swabi for lodging an FIR against the mafia. The enquiries have been conducted accordingly.

E. Incorrect, hence denied. The appellant has neither been applied to the post nor participated in the process of recruitment. Therefore, the appointment order is flying, fake and bogus.

F. Incorrect, hence denied. The whole enquiry proceedings are legal because the appellant along with other female teachers and all concerned government servants were included in the enquiry proceedings, which is evident from the enquiry report.

G. Incorrect, hence denied. If a post had not been advertised, appointment made against such post even if based on recommendations of the selection board would be void because advertising a post was basis on which merit system stood. Reliance is placed on 2000 PLC (C.S)155.

H. Incorrect, hence denied. The principle/rule of Audi alterm partem in circumstances had no application. Reliance is placed on 2000 PLC (C.S)155.

I. Incorrect, hence strongly denied. The appellant has committed offense. The flying, fake and bogus order is misconduct, blunder and irregularities. The initial appointment order had been proved as flying, fake and bogus. The appellant was given/provided ample opportunities to prove her appointment as valid but she badly failed to prove it. Thus principle/rule of Audi alterm partem in circumstances, had no application. Same is reported in 2000 PLC(C.S)155.

J. Incorrect, hence denied. If a post had not been advertised, appointment made against such post even if based on recommendations of the selection board would be void because advertising a post was basis on which merit systems stood. Reliance is placed on 2000 PLC (C.S)155. This particular post was not advertised at all. The appellant has neither been appointed accordingly nor assurance was given to be regularized. The appointment order had got through back door, it was flying, fraudulent, fake, bogus and manipulated. This appointment order had no legal effect. The respondent No.4 rightly issued a notification number 1902-1907/file, dated 5-08-2022 declared and disowned the appointment order of the appellant flying, fake, and bogus, after observing all the codel formalities. The rule of locus poenitentiae is not applicable in the instant case because the base provided for appointment order by the appellant is illegal, "rule of locus poenitentiae (power to recall) will not be applicable in case, in which basic order is illegal". Same is reported in NLR 2005 TD (service) 286:2002 PLC (CS)1093, 2000 PLC (CS) 1260, 2000 SCMR 9027,

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PLD2000, LAH 253, 1999 SCMR 2089, 1998 PLC(CS)389. Locus poenitentiae will not be attracted when employee got the appointments through back doors. Reliance is placed on 2001 PLC (CS) 121 and 2000 PLC (CS) 1172. No perpetual right could be gain on the basis of such illegal order. Principle of Locus poenitentiae could not apply to such case. Same is reported in 2005 SCMR 1040. Moreover, ill-gotten gains cannot be made a precedent. The act of regularization notified on 20-09-2022 while the flying, fake and bogus contract appointment order was disowned on 05.08.2022 much prior than the notification. Thus it is a clear indication that her appointment was not on regular basis. This is enough evidence to prove that she was not a civil servant. Thus under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, this appeal is not maintainable at all.

K. Incorrect, hence denied. The E&D rules 2011 are applicable on Civil Servants. The appellant is neither a civil servant nor her appointment was made through adopting a proper procedure for recruitment. The appointment order had got through back door hence illegal and void.

L. Incorrect, hence denied. Appointment order got through back door, which is flying, fake and bogus. Appointment in question was illegal and unlawful not only, there she had been made in a manner offensive of rules and law on the subject but also because she had been made in serious violation of the merit and transparency and that the same had deprived people of her country of her right to be served by the best, such appointment is also trampled over the rights of others, better and more qualified persons. It is unethical and unlawful to seek protection of ill-gotten gains. Law of the land does not allow anyone to encourage this.

M. Incorrect, hence denied. The appointment order was declared flying, fake and bogus. It had got through back doors. Law of land does not allow anyone to encourage such like practices. The appellant did not participate in recruitment process for her appointment at all.

N. Incorrect, hence denied. The DEO(female) signature has been scanned on appointment order.

O. Incorrect, hence denied. Everyone has approached to the official record of education department. There is also right to information Act 2013 available to approach the official record. If the appellant was aggrieved of, she could have availed such remedy. The stance of the appellant is conjectural, frivolous, contemptuous, baseless, falls, vexatious and ludicrous. She is taking argy bargy, just for creation of her right illegally and unlawfully. She wants to lead the department by its nose which has no legal backup.

P. Incorrect, hence denied. The appellant had got the appointment order through back doors. It is unethical and unlawful to seek protection of ill-gotten gains. Law of the land does not allow anyone to encourage this. The act of the respondents is in accordance with law, rules and policy. It is ethical, logical, relational and transparent because it came on surface during scrutiny after Covid-19 pandemic when over and above candidates applied for participating in induction program. It is pertinent to mention that during the period the previous DEO(F) Swabi was transferred to another district. She was not in the helm of affairs that time. She is not entitled for any leniency/back benefit in this regard.

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Q. That the respondents seek permission to raise/argue other points /grounds on the day of hearing the case.

In view of the above stated submissions it is earnestly requested that the appeal in hand may very graciously be dismissed with special compensatory cost in favor of the respondents.

Secretary,
Elementary & Secondary Education
Department KP Peshawar.
Respondent No.1

SECRETARY
Elementary & Secondary Edu: Deptt:
Government of Khyber Pakhtunkhwa

Director
Elementary & Secondary Education
Department KP Peshawar.
Respondent No.2 & 3

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

District Education Officer
(Female) Swabi
Respondent No.4

District Edu. Officer
(Female) Swabi

AFFIDAVIT

I **Sofia Tabassum** DEO Female Swabi do hereby solemnly affirm and declare on oath that the contents of the para wise comments submitted by the respondents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

AKBAR ALI ADVOCATE
Oath
Commissioner
NO 223 DATE 09.03.23

District Education Officer,
(Female) Swabi.

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Annexure-A (09)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1056/2017

Date of Institution ... 06.09.2017

Date of Decision ... 18.06.2021

Mazoor Ali Ex CT, GMS SarkoiBala, (Gadoon) District Swabi

... (Appellant)

VERSUS

The Government of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others.

... (Respondents)

Present:

MR. ZARTAJ ANWAR
Advocate. --- For Appellant

MUHAMMAD ADEEL BUTT
Additional Advocate General --- For Respondents

AHMAD SULTAN TAREEN --- **CHAIRMAN**
ROZINA REHMAN --- **MEMBER(Judicial)**

JUDGEMENT

AHMAD SULTAN TAREEN, CHAIRMAN:- The appellant named above has invoked the jurisdiction of this Tribunal through service appeal described above in the heading challenging thereby the order of Departmental Appellate Authority as to his removal from service against which his departmental appealwas not responded to till ending of 90 days waiting period.

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2. The facts as precisely gathered from the memo of appeal include that the appellant, in pursuance to an advertisement published in the year 2014 inviting candidacy for various posts including the post of CT Teacher, had applied in the prescribed manner and was tested and interviewed by NTS (National Testing Service). He, when found fit and eligible for the post of CT, was appointed by the competent authority with approval of the selection committee, vide order as annexed with the memo of appeal. He took over the charge in pursuance to his appointment order and had performed his duties as CT teacher. While he was performing his duties in the said capacity, in the year 2015, a writ petition was filed by one Hamza Ali Khan in the Peshawar High Court, Peshawar seeking appointment against the CT post and the present appellant was arrayed as party in panel of respondents. However, the appellant was not notified about the same by the Hon'ble Peshawar High Court, Peshawar and the said writ petition was disposed of without affording opportunity of hearing to him. According to copy of the judgment annexed with memo of appeal, the operative part of said judgment is as follows: ***"Keeping in view the above stated position, we are afraid we cannot entertain the request of the petitioner as far as his appointment is concerned. However, before parting with this order, we have noticed with a great degree of concern the performance of the NTS Authorities in compiling their result and the case of the respondent No. 4 is one such instance whereby he has been give 40 extra marks and that is how he stood on a better merit position when it come to the final result of the candidates. They are, therefore, not just directed but warned to be very careful as the future of so many persons is involved with the result which they ultimately present before the concerned departments. As far as the respondent No.4 is concerned,***

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respondent department shall look into the matter and decide accordingly keeping in view out directions." That the respondents in light of directions made in order and judgment of the High Court in the writ petition conducted the socalled inquiry to probe into the matter by doing so as to save their own side and NTS authorities shifted all the allegations on should of appellant. He duly appeared in the NTS test and qualified the same and that was the NTS authority who submitted the test result to the office of District Education Officer and on the basis of which the appointment order was issued. The respondents on the basis of their so called inquiry issued illegal and unlawful show cause notice to the appellant on 15.04.2017 which was duly replied by denying all the allegations levelled against the appellant. Consequently, he was removed from service vide office order dated 02.05.2017 without affording him proper opportunity and without inquiring the conduct of the NTS authorities. Being dissatisfied with the order of his removal from service, he filed departmental appeal 09.05.2017 which was not responded to till ending of 90 days waiting period leading to its presumptive rejection. In the next course, the appellant approached this Tribunal by the service appeal at hand.

3. The respondent after admission of the appeal for full hearing were put on notice. They on attending the proceedings filed written reply/comments refuting the claim of appellant for the relief as sought by him in the memorandum of appeal.

4. We have heard the arguments and perused the record.

5. It was argued on behalf of the appellant that he was not treated in accordance with law and as such, his rights guaranteed under the Constitution were badly violated; that proper procedure was not adopted before condemnation

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Service Tribunal
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of the appellant with the impugned order of his removal from service in a quite disregard to the principles of natural justice; that he was not afforded with opportunity of personal hearing and was condemned unheard; that he never committed any act or omission which could bring his case within mischief of misconduct taken as ground for disciplinary proceedings against him resulting into his removal from service. The counsel for the appellant concluded his arguments with the submission that the disciplinary action of respondents against the appellant is totally against the facts and law and impugned order resulting therefrom is not tenable and liable to be set aside. He requested for acceptance of appeal as prayed for.

6. It was argued on behalf of respondents that appointment of the appellant was procured by a misleading result submitted to the department by NTS in connivance with the appellant; that it stood proved through fact finding inquiry conducted after the direction of Hon'ble High Court that result produced by the NTS in favor of the appellant was maneuvered by the appellant by intentional misrepresentation; that axiomatically a man cannot be permitted to take advantage of his own wrong and he will not be allowed to find any claim on his own inequity; and that this Tribunal lacks jurisdiction to adjudicate in the case of appellant for the reason that by virtue of his appointment being on contract basis bringing him out of the definition of civil servant as defined under Section 2(1) (b) of Khyber Pakhtunkhwa Civil Servants Act, 1973 was not entitled to invoke the jurisdiction of this Tribunal. Learned AAG concluded his arguments with the submission that the appellant was rightly removed from service and his appeal is worth dismissal with costs, on merits as well as due to lacking of jurisdiction by this Tribunal.

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7. We will firstly take up the question of bar of jurisdiction of this Tribunal for determination; and if we are able to exclude the jurisdictional bar, then decision of the case on merit will be possible. According to the written reply of respondents, the foremost preliminary objection was related to the bar of jurisdiction. Accordingly, it was asserted that the appellant was contract employee, and the Service Tribunal has no jurisdiction to entertain cases of employees on contract basis.This objection was not settled at motion stage of the appeal but expediency of settlement of this objection is still relevant before saying any word on merits. It is evident from copy of the appointment order annexed with memo of appeal that appointment of the appellant was made on contract basis. He was removed from service by the impugned order passed on 2/5/2017 wherein it is also provided that his removal was made from *adhoc*/contract school based government service. Although the services of the contract employees were regularized by promulgation of Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 but after removal of the appellant from service. The said Act was passed by the Provincial Assembly on 15th December, 2017 and got assent of the Governor on 4th January, 2018.The appellant by then had lost the incumbency of CT post against which his appointment was made on contract basis. According to Section 3(1) of the Act ibid, the employees who held posts till commencement of the Act, were deemed to have been validly appointed on regular basis from the day of initial appointment. Thus, having no right accrued to him by virtue of the said Act, the appellant was a contract employee at the time of his removal from service and was excluded from the definition of civil servant as already dilated upon herein

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above. Under sub section (2) of Section 3 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, the jurisdiction of this Tribunal extends exclusively in respect of matters relating to the terms and condition of service of civil servants. Similarly, right of appeal to Tribunal under section 4 of the Act ibid has been given a civil servant. Thus, appeal to Tribunal by a government servant not falling within definition of civil servant is impliedly barred by law. The objection of respondents as to lacking of the jurisdiction of this Tribunal in case of the appellant and absence of his right of appeal to this Tribunal is well placed. Absence of jurisdiction of this Tribunal and of the appellant's right of appeal to this Tribunal due to his not falling within the definition of civil servant under Khyber Pakhtunkhwa Civil Servants Act, 1973, require a determination as to fate of his appeal in accordance with law. This Tribunal within meaning of sub section (2) of section 7 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 has got powers of a Civil Court as are vested in the said Court under the Code of Civil Procedure, 1908. Order VII Rule 10 CPC confers upon a civil court powers of return of plaint at any stage for its presentation to the Court in which suit should have been instituted. Order VII Rule 11 CPC deals with eventualities necessitating rejection of a plaint and one among them is that where the suit appears from the statement in the plaint to be barred by any law. So, this Tribunal having powers of a civil court is competent to have resort to the said provisions of CPC for dealing with this appeal. When we are not able to indicate another proper forum to deal with the matter in appeal, it would not be a befitting course to return the appeal within meaning of Order VII Rule 10 CPC and rejection of appeal on analogy of Order VII Rule 11 CPC is doable when appellant's right of

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ATTESTED

appeal to Tribunal under section 4 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 is impliedly barred due to his lacking status of a civil servant.

8. For what has gone above, the appeal described above in the heading of this judgment is rejected. There is not order as to costs. File be consigned to the record room.

Announced
18.06.2021

(AHMAD SULTAN TAREEN)
CHAIRMAN

(ROZINA REHMAN)
MEMBER(J)

Certified to be ture copy
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 14-9-21
Number of Words 532
Copying Fee 34/-
Urgent 5/-
Total 38/-
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Date of Completion of Copy 14-9-21
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District Edu. Officer
(Female) Swabi

Annexure-B (16)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7763/2021

BEFORE: MRS. ROZINA REHMAN ... MEMBER(J)
MISS. FAREEHA PAUL ... MEMBER(E)

Mst. Naila Gul D/o Shafique Ullah R/o Mohallah; Shagai, Village; Turlandi, Tehsil Razzar, District Swabi.

.... (*Appellant*)

Versus

1. **Director Schools & Literacy, Education Department, Khyber Pakhtunkhwa, Peshawar.**
2. **District Education Officer (Female), School & Literacy, Swabi.**

... (*Respondents*)

Mr. Muhammad Usman Khan Turlandi, Advocate ... For appellant

Mr. Muhammad Jan, District Attorney ... For respondents

Date of Institution.....16.11.2021
Date of Hearing.....29.09.2022
Date of Decision.....29.09.2022

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The appeal in hand was initially a writ petition filed in the Hon'ble Peshawar High Court, against the impugned order dated 11.11.2020, whereby appointment order dated 27.04.2020 of the appellant was withdrawn. On the request of learned counsel for the appellant, the writ petition was converted into service appeal and remitted to the Khyber Pakhtunkhwa Service Tribunal vide judgment dated 09.11.2021.

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as Primary School Teacher (P.S.T), BPS-12 vide order

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dated 27.04.2020 on the basis of being a permanent resident of village Turlandi, Union Council/Village/Neighbourhood Council Turlandai Khas. She assumed the charge on 28.04.2020. Surprisingly she was presented with impugned order bearing No. 2912-16 dated 11.11.2020, whereby her first appointment order dated 27.04.2020 was withdrawn. She submitted a departmental appeal against that order on 11.12.2020. On the reluctance of respondent department, the appellant initially went into a writ petition before the Hon'ble Peshawar High Court against the impugned order. During arguments in the august court when confronted with the proposition as to whether the petitioner was not a civil servant and withdrwal of her appointment order was not in terms and conditions of her service, the counsel for appellant requested for conversion of writ petition into service appeal and remit it to the Khyber Pakhtunkhwa Service Tribunal which was agreed by the august court in its judgement dated 09.11.2021; hence this service appeal.

3. Respondents were put on notice who submitted written replies/ comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant presented the case and argued that the appellant provided all her credentials i.e Domicile Certificate, CNIC as well as educational qualification and there was no concealment of facts on her part. He farther argued that no complaint/representation/appeal was ever made by any opponent candidate either resident of concerned union council or belonging to neighborhood council rather the appointment order was withdrawn on a complaint of elders of the locality. He prayed for setting aside the impugned order and direct the respondents to restore the original order.

ATTESTED

Examiner
Khyber Pakhtunkhwa
Service Tribunal

District Attorney

5. The learned District Attorney on the other hand argued that the appellant was not a civil servant. According to him she was appointed on temporary and adhoc basis for a period of one year and her appointment was on Union Council based merit. He further argued that she was appointed at GGPS No. 1, Naranji whereas she did not belong to that union council, rather she belonged to union council Turlandi, a fact which she herself admitted in her personal hearing before a committee constituted for the purpose on 07.11.2020. He contended that her appointment order was withdrawn in the light of section 16 of the terms and conditions of appointment.

6. From the perusal of record presented before us it is clear that certain posts were advertised including the post of Primary School Teachers. An important condition for applying for the post of P.S.T was that the candidate should belong to the union council where the post was vacant and in case no eligible candidate was available from that union council, a candidate from the adjacent union council was to be appointed. In addition to being school based, the appointment were purely on temporary and adhoc basis for a period of one year. This condition was in line with the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regulatory Act 2011. The appellant instead of applying for union council Turlandi, to which she belonged, applied for union council Naranji and was selected. On a complaint lodged by elders of the area, it was pointed out that she did not belong to union council Naranji. She was provided with a chance of personal hearing before a committee in the office of DEO (Female) Swabi. She appeared before the committee and confessed it herself that she belonged to union council Turlandi and not union council Naranji, upon which her appointment order was withdrawn.

ATTESTED

7. In light of the terms and conditions provided in the appointment order, appointment of the appellant was on temporary and adhoc basis. It is a school and union council based appointment. The same appointment order in its term-condition no. 18 states "In case of regularization....." which is a clear indication that her appointment was not on regular basis. This is enough evidence to prove that she was not a civil servant. Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 restricts this Tribunal to the extent of civil servants only. This Tribunal within the meaning of sub-section (2) of Section 7 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 has got powers of a civil court as are vested in the said court under the Code of Civil Procedure, 1908. Order VII Rule 10 CPC confers upon a civil court powers of return of plaint at any stage for its presentation to the court in which suit should have been instituted.

8. In view of the above, the appeal in hand stands returned to the appellant for presentation before the proper forum, if so desired. Parties are left to bear their own costs. Consign.

9. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 29th day of September, 2022.*

(ROZINA REHMAN)
Member (J)

(FAREEHA PAUL)
Member (E)

Date of presentation of application 29/9/22
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Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

District Edu. Officer
(Female) Swabi

Annexure-C (20)

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

DEPARTMENTAL INQUIRY.

The undersigned is pleased to notify the following committee to conduct regular fact-finding inquiry in the left over CT appointment 2020, in respect of Miss Gulsia D/O Riaz Khan now working in GGMS Tordher and Miss Saba Gul D/O Muhammad Riaz GGHSS Jalbai (kopy Attached).

The inquiry officer are directed to submit comprehensive report to the under signed within a week positively to proceed further in to the matter.

1. Mr. Muhammad Naeem Head Master GHS,Shera Ghund **Chairman**
1. Mr. Fazli Khaliq ADEO/ Ritgation officer of this office. **Member**
2. Miss Humeera Nazaneen ADEOSecy Schools(distt.Swabi **Member**

(SOFIA TABASSUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst. No 462 Dated 14/02 /2022

Forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Chairman and member of inquiry committee.
3. DEO (Male) Swabi.
4. Principal GGHSS Jalbai Swabi.
5. Head Mistress GGMS Tordher Swabi.

DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

District Edu. Officer
(Female) Swabi

District Edu. Officer
(Female) Swabi

(21)

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

DEPARTMENTAL ENQUIRY.

The undersigned is pleased to notify the following committee to conduct regular fact-finding inquiry in the CT IT appointment from 1-1-2019 up to date.

The inquiry officer are directed to submit comprehensive report to the under signed within a week positively to proceed further in to the matter.

1. Mr. Muhammad Naeem Head Master GHS,Shera Ghund — **Chairman**
2. Mr. Fazli Khaliq ADEO/ litigation officer of this office. — **Member**
3. Miss Saeeda Bano SDEO (Female) Swabi — **Member**

(SOFIA TABASSUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst. No 6458-61 Dated 4/3/2022

Forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Chairman and member of inquiry committee.
3. DEO (Male) Swabi.
4. Principal/Head Mistress Concerned ..

4/3/2022
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

4/3/2022
District Edu. Officer
(Female) Swabi

District Edu. Officer
(Female) Swabi

22

OFFICE OF THE HEAD MASTER GHS SHERA GHUND (SWABI)

No. 561 Dated: 31/03/2022

To,

The District Education Officer
(Female) Swabi

Subject: **" FACT FINDING ENQUIRY REPORT ON FAKE AND FLYING ORDER OF VARIOUS CADRES IN DEO (F) DURING 2019,20,21 ."**

Reference: **DEO(Female) Swabi Endstt No** 462 **Dated** 14-02-2022 **and Endstt NO** 658-61 **Dated** 04/03/2022.

Memo,

Here is enclosed the collective fact finding enquiry report in original and Four files of all revelent record to the teacher under enquiry namely Qudsia CT, Saba Gul CT, Shahzadi TT, Saina TT (original appointment order) and Photo copies of other documents, Samina Iqbal CT(IT) original appointment order and Photo copy other documents, Shah Naz Sadiq CT and Sawera Qayum CT Photo copy of all documents

Submitted for your kind perusal, further necessary action and record.

31-03-022

Muhammad Naeem Sb
(Chairman)

District EO Office
(Female) Swabi

FACT FINDING ENQUIRY REPORT
ON
"FACK AND FLYING APPOINTMENT ORDERS OF VARIOUS CADRES IN DEO(F) SWABI DURING 2019-20-21."

Reference:

DEO (Female) Swabi Endstt: No.462- Dated 14/02/2022 and Endstt: No.658-61 Dated 04-3-2022, two committees were constituted to probe into the above titled matter and dig out facts.

Committee No.1

1. Muhammad Naeem
   (H/M) GHS Shera Ghund (Swabi)
   as Chairman.
2. Fazli Khaliq
   Litigation officer
   DEO(M) Swabi as Member,
3. Humaira Nazneen
   ADEO Estt: DEO(F) Swabi

Committee No.2

1. Muhammad Naeem
   (H/M) GHS Shera Ghund (Swabi)
   as Chairman.
2. Fazli Khaliq
   Litigation officer
   DEO(M) Swabi as Member,
3. Ms.Saeeda Bano
   SDEO(F) Swabi.

Problem Preview:

During perusal of record, the DEO(F) Swabi came to know that certain teachers have been employed without following the laid down procedure and meritorious process. Especially when a greater number of teachers got presented before her who were called for participating in Induction programme for teachers employed in 2019-20 through FTS. The DEO(F) got blurred and felt that there was something fishy. She started internal scrutiny and ordered enquiry. Many mind-boggling things happened coming up on surface which will remain a stigma on the face of this department for long.

The committee started its work without wasting even a single unit of time. It has unearthed shameful facts and characters in this shameful act and the worst episode of corruption.

Committee No.1 had to enquire CT, TT and Qaria appointments while committee No.2 had to enquire CT(IT) appointments.

Method of enquiry:

1. Perusal of record
2. Statements
3. Questionnaires
4. Interviews
5. Visits

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No. of proceedings: 10(+)

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All the concerned were informed properly. Case to case finding in length are given below:

(A) Ms. SABA GUL (CT) and Ms. QUDSIA (CT)

1. Both the above mentioned teachers have been appointed vide Endstt: No.1533-40/DA-I/App/CT-F/2020/Dated 07-07-2020.
   Both were posted at GGMS Jamra (Swabi) and vide corrigendum 2050-55/DA-II/CT/2020 Dated 08-9-2020, were posted at GGHS Tano and GGHS Lahor Sharqi respectively. In fact, in dairy register1533-40 as above indicates the original five left over CT candidates.
2. **Pay Release:**
   There are two pay releases on record.
   In the first pay release vide Endstt: No.2070-G/Apptt of CT/pay release Dated Swabi the 08-9-2020 reflects names of Saba Gul (CT) and Qudsia (CT).
   Astonishingly, In dairy this number indicates DA-II CT (IT). In second pay release vide Endstt: No.2239/Apptt of CT/(F)/pay release/Dated Swabi the 28-9-2020 reflects SABA GUL (CT) only, from GGHSS Jalbai.
   This is a crazy contradiction. These two pay releases are manipulated and bogus.
3. In DAO Swabi, the pay was released on the above mentioned suspicious, allegedly scanned photo copy documents and strict procedure has not been followed in these cases as they usually do.
4. Saba Gul (CT) was called to appear before the enquiry committee with all original record in defense. She attended the proceedings twice. The committee asked questions about her appointment.

- ⇨ She seemed confused and frustrated.
- ⇨ According to her, her late father dealt all matters related to her appointment.
- ⇨ She did not know even her FTS Roll No and Centre.
- ⇨ To a question whether any relative is employed in education department right now, her answer was " **absolutely not"**
- ⇨ The replies on questionnaires are crammed, thus, not satisfactory.
- ⇨ She could nor present even a single ~~Grate~~, original and authentic document in her defense.

Ms.QUDSIA (CT)

Details of appointment and pay release are almost the same as in the case of Saba Gul (CT) mentioned above when interviewed.

(I) She was a little emotional and bashing office for what is happened. Once, She lashed out the committee but then controlled herself.
(II) No idea about her FTS Roll No and result.
(III) When asked about any family member employed in education department right now, her reply was **"No"**

The committee considers it worth mentioning at this moment of time that:

"Both SABA GUL (CT) and Qudsia (CT) have concealed the fact of their relation to any serving employee of the education department for unknown reason.

Fact of the matter is, Ms Qudsia (CT) is the sister of Muhammad Hussain J/C and Samiullah J/C of SDEO(F) establishment Lahor while Saba Gul (CT) is wife of Muhammad Hussain J/C as mentioned above. Both J/Cs were once close intimates of EMIS section of this office"

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Record Perusal:

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The office record shows that:

1. There is no official verification of documents before release of pay.
2. The diary no 2070-G has been allotted to DA II CT (IT) rather than CT under enquiry.
3. Names of the above said appointed teachers neither included in tentative nor in final merit list.
4. Verification of documents from concerned institution has not been obtained properly.
5.

Statement of Zain ul Wahab DA-II CT

The DA-II CT stated as

"I, Zain ul Wahab S/C ,have been dealing CT cadre in DEO(F) Swabi since December,2019." Prior to me, all posting/appointments of CT were being dealt by Mr. Saleem Akhtar APO. The CT teachers appointed in Left Over case, have not been processed from my file.

There is no copy of these cases, exists on my file. I am un aware of this order. In an other statement, he maintains that original CT File was maintained by Ex APO and despite repeated requests, he could not hand over the same till date.

Incharge EMIS Seaction:

Mr. Fazal Wadood APO is serving as incharge EMIS section wef 15-10-2021. He was performing duties in the same capacity before at DEO(M) Mardan.

Replying Q.No-3, from whom have you received the charge of this office, he shows reluctance and frightens to name the person.

Replying Q.No-4, had you received complete charge or otherwise, he replied as,

"During taking over charge, I received only one computer wherein WINDOW was not installed. There were some induction tablets i.e incomplete charge."

To a question any deficiency in the charge, he replied,

" Online user, appointment record, Laptop and routine letters.

Replying Q.No-7 about **" when did you come to know about the deficiency and when did you bring this in the notice of the competent authority?"** he replied ,

"Immediately after taking over charge, I came to know that the handed over Soft Ware is incomplete and un satisfactory. I called the Ex-APO to my office to complete the charge. I took up the matter with DEO also. The APO handed over the mentioned Data along with Hoser. Even then CT (IT) merit list was missing. Again through letter and email. He was informed. He came to this office again on 26-02-2022 and hand over the remaining deficiency about which it is necessary to mention that merit list is still missing in the email.

Replying Q.No-11 about **" your opinion on these fake and flying orders, he replies as "there is no record in hard on file of DA concerned while in soft there is nothing in EMIS available record. As for as the impugned order are concerned,appearently, they are scanned."**

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SALEEM AKHTAR EX-APO DEO(F):

Mr.Saleem Akhtar Ex-APO DEO(F) was EMIS incharge at DEO(F) Swabi during the period when the impugned orders were released.

He was noticed to appear before the enquiry committee to incorporate his version.

He faced the enquiry proceedings on 14-03-2022 at 10:00 AM in DEO(M) Litigation Office.

He replied the questionnaire as follows:

1. What is your tenure of posting at DEO(F) Awabi?
   Reply: wef 17th August 2016 to 07 October, 2021
2. What was your role in appointments particularly from Jan,2019 till relieving of charge?
   Reply: The appointments issued during my tenure except 2018-19 dealt by Fazal Wadood, in 2020-21, my work was to prepare merit list in accordance with the recommendations of the committee to check academic record, was the responsibility of the committee.
   Merit lists in soft from, have been handed over to the present AP.
3. What is your expert opinion about the alleged scanned appointment orders of Ms.Saba Gul and Qudsia CT?
   R: I cannot say anything about this.
4. The list you have provided on your Whattapp to DEO(F) about the number of CT,CT IT teachers employed in 2020 is contradictory to that provided by Directorate (E&S) wherein you have shown 2+1 more numbers and which is exactly the number of impugned orders issued.
5. R: The information I have forwarded was provided by DA. Personally, I have no such information.
   Q.No-5 You have been accused of missing your office?
   R: The accusation is wrong and I have not done so.
   QNO-6 whatever in your mind about these impugned orders, tell?
   R: I cannot say anything about this. Record keeping is the duty of DA. My duty is to maintain merit list which I have handed over to present AP. I was not DA of any cadre:

Miss Humaira Nazneen ADEO(F) Swabi

In her statement, She clearly rejects all the signature on appointment order, pay release orders in r/o Ms.Saba Gul CT and Qudsia CT, are fake and bogus.

(B) Ms.SHAHZADI QARIA (DECEASED) :

1. Ms.SHAHZADI was appointed as Qaria (Deceased) Quata vide Endstt No 4525-29 dated Swabi the 11-09-2019 she was posted at GGHS Jalbai Swabi.
2. Her pay release vide Endstt No 5380/DA-II Dated 7-11-2019 was issued.
3. On perusal of record, nothing exist on proper file in DAO Swabi, Phocopies of her record exists with no proper evidence.
4. The most interesting fact is neither her father belong to E & Sec department nor died during service.it was revealed during proceedings that her father belonged to Jail Police. The candidate got married in May 2001 and has joined another family now According to her, her father was died on 11-4-2000.
   No document/due approval exists on file for availing this quota.

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5. She could not reply the questionnaire confidently. She named died person, her brother -in -law and late safdar Astt DEO(F) who facilitated her appointment. She also failed to provide necessary relevant documents. Orally, she admitted if the mather finishes up with her resignation from the post, she is ready to do so.
6. Mr.Izhar DA confirms that the initial on the appointment beneath the main signature of Ms Dilshad Ex-DEO (F) Swabi, is not his initial and that is bogus and fake.
7. The teacher could not present her original appointment order, pay release order, father death and Service certificate, any approval to be appointed against the deceased quota in E&S department or any other authentic documents which may justify her appointment.
8.

(C) SAINA TT disabled Female (Left Over)

(D)

1. Saina TT has been appointed as disabled (F) Left over vide Endstt No 3993-G/DA II Dated 29-7-2019. Astonishingly, at the same Endstt No, she has been appointed as TT (Left Over) with out mentioning disabled.
2. It is vital to note that there is no TT (F) disabled vacant post in the advertisement issued by Directorate Elementry and Secondary Education Peshawar .
3. Pay release in this case has been issued for disabled TT.
4. There is no disability certificate or other evidence either with her or the office record.
5. According to Ex Head Mistress GHSS Zaida, Ms Zaiqat Begum's statement **" As per para 7 of appointment Endstt: No.3993-G/DA II Dated 29-7-2019, appointment is in disabled quota, I was directed to hand over charge. On producing original appointment order and original medical certificate, I was bound to hand over charge to her.**

   She produced a pay release order No 4757/DA II Dated 25-9-2019 and then I directed the clerk to prepare the pay bill and the service book. Having prepare and signed her service book and source I, received a cheque of her salaries duly paid to her."
6. **Ms Saina was called and she recorded her statement as:**

   " She declares on oath that she is performing duties as TT at GGHS Zaida wef.2-9-2019 as per appointment order issued by the department. Now, I have come to know that there is something wrong with my appointment order. I am not at fault in this. I have been appointed as disabled. I affirm in writing that I am not disabled. The order has been issued by the office. If there is anything wrong or negligence, the concerned officials are responsible.

   We are noble and modest people. I have handed over the original appointment letter to the enquiry committee which is now a part of your record.

   Whatever the competent authourity decides, would be acceptable to me. I have neither committed a crime nor tried to conceal it. Therefore according to Pakhtun Traditions and Islamic values, my case my be treated leniently as I am innocent.

   As am innocent, I may not be dragged in any disciplinary severe action,"

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(E) SAMINA IQBAL CT(IT)

1. Appointed against CT (IT) BPS#12 on adhoc base one year contract vide DEO(F) Swabi Endstt No 1111-1118/DA I/App/CT IT F/2020 Dated 15-05-2020. She was posted at GGHS Batakara (Swabi) where she is performing duties till date.
2. Her name is not included in the tentative as will as the final CT IT merit list provided by EMIS section.
3. The Endstt 1111-1118/DA II Dated 12-05-2020 mentions CT Female. appointments in the dairy and issue register and hence, fake and bogus.
4. Replying various questions in the questionnaire, she maintains that:

- ⇨ Her name is Samina Iqbal, hails from village Kalu Khan.
- ⇨ She is MA(Isl),M.Ed and DIT.
- ⇨ According to her,she had applied online for the post.
- ⇨ She did not replied about her R.No. in NTS. However, Marghuz High School was her centre in the examination and secured 53 marks.
- ⇨ In office, her case was being dealt by safdar Sb (who is died now and was Asstt in the office.)
- ⇨ She had received call from office about her appointment sister-in-law/ husband, Haroon Khan.
- ⇨ Activation of salary was done by office as normally done in other teachers' cases.
- ⇨ Haroon had submitted her salary case and she did not know more about that .
- ⇨ She will hold the office as responsible because my order is original also my documents.

Now, I have submitted my original order to the enquiry committee. (The Original order when shown to DEO(F) she rejected outright the originality of her signatures and termed it as manipulation.

5. Her pay release order vide 2069-G/appointment of CT IT(F)/Pay release Dated Swabi the 8-9-2020 relates to SST IT in the Diary Dispatch register. Hence, the pay release order is manipulated and bogus.

(F) SAWERA QAYUM CT, GGMS DALORI (G) and SHAHNAZ SADIQ CT-do-

1. The appointment order of Sawera Qayum CT issued vide 1707-G Dated 27-7-2020 is actually pay release order in diary and Dispatch register.

   The appointment order of Shahnaz Sadiq issued vide IV pay release order in the dairy and Dispatch register.

   Both the appointment orders are flying and fake.
2. The original pay release in r/o Ms Laila Kamal DM, Endstt No 2297/Release of pay,Swabi the 28-9-2020, has been manipulated by inducting names of Sawera Qayum and Shahnaz Sadiq under enquiry with Endstt No 2297/apptt of CT (F)/ pay release/ Swabi the 28-9-2020.
   This is fake , fraudulent and flying order.
3. The two teachers under enquiry were given same questionnaire to respond. But their replies are not plausible and appealing.
   Their replies are feeded and the committee is not satisfied with it.
4. HRIS Record regarding the two teacher show that Shahnaz Sadiq CT BPS#15 has D/O birth as 31-Dec-2018 which that of Sawera Qayum CT BPS#15 is 10-Oct-1990.

   In case of Shahnaz.Sadiq D/O 1st entry to service is 31-Dec-2018 while that of SAWERA QAYUM is also 31-Dec-2018. Current posting Date in r/o

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Shahnaz Sadiq is 31-Dec-2018 while that of SAWERA QAYUM is 31-Dec-2018. Is it not ludicrous?

5. Original service books of both there teachers when perused, it was found that initial under each entry was of Mr. Muhammad Ali S/C account section at this office. When he was enquired by DEO(F) in presence of the enquiry committee. He admitted his blunder in writing with the remarks that he had not done that malafidely. He named Mr.Sadiq J/C GHSS Ismaila (Swabi) who made him signed these service books that time.

The committee called Mr.Sadiq to appear and explain his position. He recorded his statement as follows:

Mr.Sadiq Ali was J/C at GHSS Adina by the time, Mr. Abdul Qayum who was his neighbor. He told him in the evening that his daughter (Sawer Qayum) and her friend (Shahnaz Sadiq) had been appointed as CT. Please make service books and papers for their salaries.

I received service books and documents and prepared them all. The next day I handed over the prepared service books to him. I have made the service books of Sawera Qayum and Shahnaz Sadiq One day, I was in office. Mr.Saleem Akhtar AP apprised me to pass salaries of the two teacher whom service books I had prepared, from account office that time, I told him that my friend Tilawat Shah (Dealing hand in DAO was not present and I was also not free. Since, this seat belongs to Mr.Muhammad Ali in the office, so he would do that.

As my profession is clerk. Often,on sympathetic grounds, I prepare service books, pension papers, promotion cases,schools budgets and reconciliation. Similarly, I did that:

Now, since came to know through enquiry that this was bogus. So I have been used frankly in making all this.

2. Before making this service book, one of my friends sajid from ismaila told me that his sister had been employed at GGHS Maneri Bala. He asked me to accompany him. Yes, I accompanied him and I had made papers for drawing salary.One day, he called again saying that her second sister had been employed and asked to accompany him to Marghuz and I went to a Hujra in Marghuz with him.

3. Once, Sajid called and said, **"the service books you have made,ask Muhammad Ali and get them signed from DEO(F). I contacted Muhammad Ali that one of the teachers was my neighbor and the other was the sister of my friend. Perhaps, I have been used in this Matter."**

Analyzing this statement, it is very easy to understand that the wrong doer was present inside the queue and provides important lead to detect the real culprit.

SOFIA TABASSUM DEO (F) SWABI

Madam SOFIA TABASSUM DEO (F) ,was found profound committed to segregate right and wrong and allowed the committee to work freely.

She was gavin a questionarie to respond and she did the detail of her replies is given below:

- She had taken over charge of this office wef 16-Nov-2019.
- Till date , She had issued various order of different cadres like CT-AT-TT Quria,PET,DM,CT(IT) and CIVs.
- When Saleem Akhtar Ex APO, got transferred from Swabi to Mardan,the new incharge (EMIS) informed about the incomplete charge. Apart from that, some orders came on surface such that I got suspected particulary, when more

31.3.022

District Edu. Officer
(Female) Swabi

(30)

- number of recruited teachers appeared for participating in Induction programme. I started internal scruiting without waisting anytime. signs of fraud and manipulation began to appear.
  I started impartial enquiry and by every passing day, the issue is untwisting.
- Soon after the beginning of internal scruiting facts began to come on surface. Based on these facts, I stopped salaries of impugned recruited teachers
  I ordered the EX-APO to provide details of vacant posts and recruited teachers in 2020. The said incharge mis informed me about these details. The difference between the list provided by him and that provided by the number of doubtful (illegal) teachers recruited.
  I recommended to lodge FIR against the said incharge and the these fake employed teachers..
  Ihave written to worthy Director for grand enquiry.The enquiry is continuing till logical end.
- I have sought explanation from all dealing hands and want to reach the real offender.More details have been shared above.
- I think that dealing hands are responsible. The misshap occurred due to their weakness further investigations are underway.
- Dealing hand in the office, DAO office dealing hands, health department and certain hidden private people gangued up to do all this.
- No original signature of mine. My subordinate exists any where on any documents only scanned and fraudulently prepared documents are there. In case if my original signs have been taken fraudulently in rushof work, it would not be malafidely or due to incompetence. Because the wrong doer is very cunning, sharp and cheeky bastard.

Ex-DEO(F) Ms DILSHAD BEGUM NOW DEO(F) Abbottabad.

Ms DILSHAD BEGUM EX-DEO(F) Swabi, Signatory of some alleged fake and flying orders, was called in writing through DEO(F) Swabi regarding the issue of flying appointments under her signatures as mentoned above to submit her reply or visit DEO(F) office within a gavin time. She was intimated about the enquiry proceedings thereof. But the same registered letter returned undelivered with remarks on the envelope.

"The said officer is not anywhere posted in abbottabad."

Simultaneously, she sent voice message to the existing DEO(F) wherein she depicts that **"Calling DEOs that way is not good call the with record if there is no record, proceed against them accordingly etc."**

DAO OFFICE SWABI

The DAO Swabi was contacted in writing and physically to provide the pay release record in r/o these teachers they only showed their record and their written apply is still waited.

As per record available in DAO Swabi,it is almost the same as avaible in the DEO(F) local office. Verily, strict procedure in releasing of pay, has not been followed in these cases.

No document has been signed by DEO (F) herself. The documents have only been attested by ADEO(F) Secondary which she Catagorically denies.

It has come into the notice of the enquiry committee that DEO(F) Swabi has already

31.3.022

District Edu. Officer
(Female) Swabi

7. No doubt, the establishment in DEO(F) Swabi has played a Sluggish role and has showed slackness in performance of their duty that time. Especially, EMIS Present incharge Mr.Fazal Wadood and Zain ul Wahab DA ii. But all of them were paralyzed by Mr. Saleem Akhtar Ex-APO and even today, they get frighten when mention him.
8. Their statements show that the important record has been disposed by Mr.Saleem Akhtar and the CT original pl[illegible] on technical grounds but the crime can not be concealed so easily.

   In fact, he is the apple of discord and managed the crime with devilish skills he is famous for.
9. How much the offender is cunning and sharp, he leaves some foot-marks behind him.
10. The wrongly appointed teachersmostly name official and relatives who are not alive now, who facilitated their appointments. This worst tactic and concealment of fact.

    Dots when connected, important leads go towards Mr.Saleem Akhtar Ex-APO EMIS section DEO(F) office.

⇨ On 23-June-2021, he forwarded a PDF to DEO(F) as asked by her to provide details of posts year wise. when the PDF is opened, the information he gives for the year 2020 is, CT BPS 15, total advertised posts=19 total appointed = 19 while CT IT BPS#12 total advertised post=12, Total appointed = 12. Now, list provided on the same subject by directorate E & S.Ed. indicates CT BPS 15 total advertised posts=17 total appointed teachers = 17 and CT IT BPS.12 total advertised posts= 11 and total appointed = 11

This clearly confirms that 02 fake CT and 01 fake CT IT were appointed that year.

Misinforming the competent authority as above is showing his malafide intension which has been proved like eggs are eggs.

His transfer from this office was a result of a complaint, can not be described here. While leaving this office, he left incomplete charge. He has taken away the hard-desk of his official computer without any permission.

He was continuously showing reluctance in leaving complete charge. Some important data is still missing.

He wisely avoided his direct involvement in any case. But he used others. For example, when Sadiq Ali J/C GHSS Ismaila was called to explain his position about his links in case of Sawera Qayum CT, he directly named Salim Akhtar who had told him to help releasing his salary from DAO Swabi.

His living is beyond his income and the company he keeps is direct beneficiary of these fake appointments

His response could not satisfy this committee as he was concealing facts

His previous record shows that he is a person who makes such like crimes again and again.

8. The committee with full convection finds that no other official/officer at any level has acted malafidely. However, there was a profound level of incompetence and slackness especially DA II/EMIS

But the DA II, Mr. ZAIN UL WAHAB record was checked. He is a pious, noble and clean official.

His professional weakness has been exploited for own gains and agenda. He performed duty under the influence and magic of EX APO who transgressed and maligned the innocent DA II, who is now speechless.

II. Ms.SOFIA TABASSUM DEO(F) Swabi , has been found clean, transparent, with clean hands and a strong lady with sound character. As up now, no evidence of illegal involvement in all these fake appointments.

31.3.022

District Edu. Officer
(Female) Swabi

Transgression or malafide, had been observed on her part. She has opened the cases with broad heart and mind and she always co-operated with the committees She is committed for the logical conclusion of all these cases.

12. All the fake appointed teachers surprisingly, concealing the offender rather than their selves. Some of them were found using their influence at all levels to protect themselves during the course of enquiry.
13. Behind this blatant transgression, there was a strong mafia headed by EMIS incharge, who got benefitted and the nature of this illegal act belongs to their expert skills.
14. Forensic of documents, CDR of the persons pointed out, more will come on surface if investigations keep on continuing.

Annexures:

File No-1 (photo copies of appointment orders, pay release, order corrigendum, Copy of Dispatch register, Statement and other employment record in r/o Qudsia CT and Saba Gul CT. Also statements/Questionaries recorded/Responded in r/o DEO(F) replies on the questioner, Humaira Naznain ADEO, Izhar Hussain Asst, Saleem Akhtar Ex APO and others, Notices.

File No-2 (Photo copies of appointments, Pay Release Orders,academic documents and Statement etc in r/o Shahzadi Qaria.

File No-3 (original appointment order, copy of pay release, Statement etc in r/o Saina TT.

File No-4 (photo copies of appointments order, Pay Releases, Statements and other relevant document in r/o Shah Naz CT and Sawera Qayum CT. Also original appointment order, Merit Lists, Pay Release, Statement and other document in r/o Samina Iqbal CT (IT).

31-3-2022

1. (Muhammad Naeem)
Chairman.
Enquiry Committee (1st & 2nd) Committee

2. (Fazli Khaliq)
Litigation officer
DEO(M) Swabi as (Member),1st & 2nd Committee

3. (Humaira Nazneen)
ADEO Secondary DEO(F) Swabi
(Member) 1st Committee

4. (Ms.Saeeda Bano)
SDEO(F) Swabi.
(CT-IT Committee) 2nd Committee Member

Dated: 31/03/2022

District Edu. Officer
(Female) Swabi

OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-920053 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

No. 1/GB, dated Swabi the 25-3/2022

DA-II

930
2/4/2022

2-4-2022

To: The Director,
Anti Corruption Establishment,
Khyber Pakhtunkhwa, Peshawar.

Subject: LODGING OF FIR UNDER SECTION 419, 420 PPC 1860 AGAINST THE FAKE APPOINTEES AND THE APO AT DEO (F) SWABI FOR HIS SLACKNESS AND ABUSING HIS OFFICE.

Memo:

The District Education Officer, (Female) Swabi vide letter No. 665, dated 04.03.2022 has reported some illegal appointments in Education Department. The contents of the above letter were enquired, during which the local Police sought legal opinion from District Public Prosecutor Swabi, who after perusal of contents of the above letter, opined that the offence falls within the cognizance of Anti Corruption Establishment and as such be sent to the Anti Corruption Establishment for further necessary action under the law.

Keeping in view the above factual position, it is, requested that the matter may please be enquired through your establishment for further course of action, please.

MUHAMMAD SHOAIB KHAN (PSP)
DISTRICT POLICE OFFICER
SWABI

No. 2607-8/GB,
Copy forwarded for information to the:-

1. SDPO Swabi for information.
2. District Education Officer, (Female) Swabi w/r to above.
3. SHO PS Zaida for information w/r to his report dated 15.03.2022.

MUHAMMAD SHOAIB KHAN (PSP)
DISTRICT POLICE OFFICER
SWABI

District Edu. Officer
(Female) Swabi

21/3/2022

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9225344 Email: ddadmn.ese@gmail.com

DA-II
28/3/2022

Annexure-D

Notification.

Consequent upon the approval of the competent authority, Mr.Sharif Gul Principal B-19 (at the disposal of this Directorate) is hereby nominated as enquiry officer to conduct enquiry against Mr.Saleem Akhtar Ex-AP office of the DEO (F) Swabi now at DEO (M) Mardan in the light of the letter of DEO (F) Swabi vide No. 663 dated 4.3.2022 (copy attached).

The enquiry officer shall submit his report possessing facts/ finding with recommendation within a week to this directorate for further necessary action.

877
28/3/2022

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 784-90 /A-23/Complaint /Mardan Vol-II/2021 Dated Peshawar the 16/03/2022

Copy forwarded to the: -

1. M. Sharif Gul Principal B-19 (at the disposal of this Directorate) alongwith copy of the letter No.663 dated 4.3.2022
2. District Education Officer (Female) Swabi w/r to her letter No. 663 dated 4.3.2022 with the direction to cooperate with the inquiry officers.
3. District Education Officer (Male) Mardan with the direction to cooperate with the enquiry officer.
4. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Master File

16/3/22

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

21/3/2022
District Edu. Officer
(Female) Swabi

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District Edn. Officer
(Female) Swabi

35

NQUIRY OFFICER NO 1-7 DATED: 24/03/2022

I. The Distr ct Education Officer (F) Swabi
II. The Miss Dilshad Begum Ex.D. E.O (F) Swabi/ Now D. E.O (F) Abbottabad.
III. The Ex.Dy. D.E.O (F) Swabi Now D.E.O (F) Tor Ghar.
IV. The Superintendent (Estt) Secondary Swabi.
V. The A.D.E.O Establishment Secondary Swabi.
VI. The Assistant Programmer E.M.I.S Swabi.

JBJECT: PROVISION OF RECORD FOR INQUIRY NOTIFICATION VIDE NO:789-92 DATED: 16/03/2022.

I am to refer to the subject cited above and to state that fake /irregular ppointments reported by you needs necessary perusal of the record from 15-11-2019 date.

The record pertaining to these appointments stepwise i-e vacancy positions to final ay drawl i-e. Advertisement-ETEA/NTS Results, DSC meeting minutes, Merit Lists, ppointment orders, Photo-Copy of issue register, Pay release orders etc in various cadres Quotas may please be provided by 29/03/2022 duly signed with covering letter to luhammad Hammad Masood (J/C) OR directly to the undersigned in Govt; Shaheed aqib Ghani H.S.S Peshawar Cantt.

SHARIF GUL 24/3/22
INQUIRY OFFICER

opy for information with the same No and date:

Mr. Muhammad Hammad Masood (J/C) Govt; Shaheed Saqib Ghani Higher econdary School Peshawar Cantt.

-Sd-
SHARIF GUL
INQUIRY OFFICER
0333-9122849

District Edu. Officer (Female) Swabi

24/3/2022
District Edu. Officer (Female) Swabi

(36)

GOVT: SHAHEED SAQIB GHANI HIGHER SECONDARY SCHOOL No.2 PESHAWAR CANTT.

No. 116 Dated: 24/06/2022.

SHARIF GUL PRINCIPAL (INQUIRY OFFICER)

SERVICES AT THE DISPOSAL OF DIRECTORATE

To,

The Director E&SE
Khyber Pakhtunkhwa, Peshawar.

Subject: INQUIRY REPORT VIDE NOTIFICATION No:789-92/A-23/COMPLAINT/MARDAN/VOL-II/2021.

I am to refer to the above cited notification and to state that, In compliance of the inquiry notification the undersigned visited the office of D.E.O (Female) Swabi on 24/03/2022. It was found that the D.E.O (Female) has already initiated inquiry against the said fake/ illegal employees and the office as whole was very much involved in the said case. However a letter was issued to all relevant stake holders vide: 1-7 Dated: 24/3/22 (**Annex : A**). In response to the same letter the D.E.O (Female) requested for some days for completion of the record. In addition, She informed the undersigned that Mr Saleem Akhtar has filed a writ petition against the said process (**Annex : B**). The process was therefore suspended for several days. Afterwards, by dismissing the petition by honorable court, the office of D.E.O (Female) was again visited on 26/06/2022. The undersigned asked for the record. Which was provided along with inquiry report which was internally conducted (**Annex : C**).

The inquiry report conducted internally was perused thoroughly. It is a complete/comprehensive document and left no room for further investigation regarding the facts of the case. Any further proceeding will just be repetition and spoiling of time. It was found that the report is sufficient for any necessary action to be taken by the authorities.

However actual accused Saleem Akhtar (Assistant Programmer) has left no foot prints and left the office with clean hands. Therefore, he may be strictly abandoned in involvement in appointment/transfer and may be kept under vigilant eye while posting him in any office.

District Edu. Office
(Female) Swabi

SHARIF GUL
PRINCIPAL (BPS-19)
WAITING FOR POSTING
INQUIRY OFFICER

24/6/2022

(37)

DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 15577 /A-23/MS/Complaint/Mardan/Vol-II/2021/KC.
Dated Peshawar the 29/7/2022

The District Education Officer,
(Female) Swabi

BJECT:- INQUIRY REPORT VIDE NOTIFICATEION NO.789-92/A-23/COMPLAIN/MARDAN/VOL-II/2021

no:-

I am directed to refer to your letter No. 116 dated: 29-07-2022 on the subject cited ve and to ask you to (Disown) the appointment order of fake/bogus teachers please

29/7/22

Assistant Director (Admn)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

opy forwarded for information to the:-
1 PA to Director E&SE Local Office.

Assistant Director (Admn)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

District Edu. Office
(Female) Swabi

29/7/2022
District Edu. Officer
(Female) Swabi

Annexure-E 38

DISTRICT EDUCATION OFFICE(FEMALE) SWABI

(Office Phone & Fax No 0938280339, emisfswabi@yahoo.com)

DEPARTMENTAL ENQUIY

The undersigned is pleased to Notify the Following inquiry Committee to Conduct inquiry and probe into the matter of left-over CT Appointment 2021, in respect of Miss Madeeha D/O Sultan Sher in GGMS Gajai

The inquiry Officer are Directed to submit comprehensive report to the under signed within a week positively to proceed further in to the matter.

1. Mr Muhammad Naeem Head Master GHS Shera Ghund **Chairman**
2. Mr. Fazli Khaliq ADEO/Litigation officer of this office **Member**
3. Miss Naila Naz DDEO District Swabi **Member**

(SOFIA TABASSUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst: No. 3153-69 /DA-II/CT / Dated 12/11/2022.

Copy for information to the:-

1. Director E&SE Khyber Pakhtunkhwa peshawar.
2. Chairman and member of inquiry committee.
3. DEO (Male) Swabi.
4. Head Mistress GGMS Gajai .

12/11/2022

DY:DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

(38)

DISTRICT EDUCATION OFFICE
(FEMALE) SWABI

Phone No: 0938-280339 Email: emisfswabi@yahoo.com deofemaleofficeswabi

Endst. No. 3667 /File, Enquiry vol-I Dated: 26/12/2022

The Director
(E&SED)
Khyber Pakhtunkhwa.

ct: **To Expedite the action against Saleem Akhtar Ex APO DEO (F) Swabi Now APO at DEO (M) Mardan.**

:

It is submitted that:

1. Seven fake and bogus appointment order of various cadres already disowned as directed by your good office.
2. In continuation of the above fake and bogus orders, another case has been inquired and found fake and bogus, Thus, disowned in r/o MS Madiha CT GGMS Gajai (G) Swabi
3. The Main responsible behind all these fake and bogus appointments has been found as Saleem Akhtar as titled above being already reported for stern disciplinary action but the action still awaited which is vital for natural justice.

Please expedite the requisite pending action againt the offender as titled above.

Profound regards

DISTRICT EDUCATION OFFICER
FEMALE SWABI

District Edu. Officer
(Female) Swabi

District Edu. Officer
(Female) Swabi

(40)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No_____/F.No./A-23/MS/Complaint/Mardan/Vol-II/2021/KC/Saleem Akhtar
Dated Peshawar the 26/12/2023

Phone: 091-9225344 **Email:** ddadmn.ese@gmail.com

DA-II

To

The Secretary to
Govt of Khyber Pakhtunkhwa
Elementary & Secondary Edu: Department.

4418
7/12/23

Subject: **TO EXPEDITE THE ACTION AGAINST SALEEM AKHTAR EX- APO DEO (F) SWABI NOW APO AT DEO (M) MARDAN.**

Memo:

In continuation to this Office letter No.2026 dated 7/9/2022, I am directed to refer to the subject noted above and to enclose herewith a copy of letter No. 3667 dated 26/12/2022 alongwith its enclosure received from District Education Officer (Female) Swabi and to request that expedite the action against Mr. Saleem Akhtar Ex-APO office of the DEO (F) Swabi now APO at office of the DEO (M) Mardan please.

Assistant Director (Admn)
Directorate of E&SE K.P, Peshawar

Endst: No. 4399/

Copy forwarded to the: -

1. District Education Officer (Female) Swabi w/r to her letter No and date cited above.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

26/12/23

Assistant Director (Admn)
Directorate of E&SE K.P, Peshawar

District Edu: Office
(Female) Swabi

District Education Officer
(Female) Swabi