


Cost of Rs. 5000/- received in Service Appeal No. 7756/2021.

Titled Shahana Hameed vs. Education

in the office of Assistant Registrar, Vide Order 18<sup>th</sup> July, 23, Submitted Dated: 09/10/2023.

  
Assistant Registrar  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 7756/2021**

Mst. *Shahana Samad* District Bannu.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa through the Secretary E&SE  
Department & others.....Respondents

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*[Signature]*  
**Assistant Director (Lit: II)**  
E&SE Department, Khyber  
Pakhtunkhwa, Peshawar.

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

Service Appeal No: 7756/2021

**Shahana Hameed, ASDEO (F) Establishment office of the District  
Bannu.....Appellant.**

**VERSUS**

**Government of Khyber Pakhtunkhwa through the Secretary E&SE Khyber Pakhtunkhwa &  
others.....Respondents.**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.**

**Respectfully Sheweth :-**

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

**Khyber Pakhtunkhwa  
Service Tribunal**  
Case No. 8199  
Dated 09/10/23

1. That the appellant has got no cause of action /locus standi.
2. That the appellant is not an aggrieved person within the meaning of Article-212 of the constitution of Islamic Republic of Pakistan.
3. That the appellant has concealed material facts from this Honorable Tribunal.
4. That the appellant has not come to this Honorable Tribunal with clean hands rather the instant appeal is based on malafide intention for legal cover of her corruption of PTC Funds during her posting as Head Master in District Bannu.
5. That the matter in hand is bad by law & limitation, hence the impugned order dated 30-06-2021 has got finality against the appellant.
6. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
7. That all codal formalities including show cause Notice & formal inquiry vide order dated 21-11-2019 has been observed & conducted by the Department.
8. That the appellant is liable to pay & deposit the embezzled amount of Rs. 390000/- as per finding & recommendation of the inquiry committee imposed in view of rules-4 (a) (I) and (III) of E&D Rules 2011 vide Notification dated 02-09-2020 by the Department.
9. That the appellant has been found guilty of misconduct & financial corruption under the provision of Rules-3 (b) & (c) of the Rules under reference.
10. That the titled appeal is not maintainable in its present form with further contention that no Departmental appeal against the order dated 30-06-2021 has been filed by the appellant to the competent authority.

**ON FACTS**

- 1) That Para-1 is incorrect on the ground that the appellant is working in the Department against the SST in BPS-16 Teaching Cadre post & has been adjusted against the ADEO (F) in the office of the Respondent No.3 on stop gap arrangement till the arrival of an officer of Management Cadre to the Department.

- 2 That Para-2 is correct that vide Notification dated 15-09-2015, the services of the appellant were placed against the HM post at GGCMS Hayat Mohammad Khel Bannu under the relevant Law & Rules by the Department.
- 3 That Para-3 is incorrect & denied on the grounds that she has been proceeded under the E&D Rules 2011 on charges of corruption in the PTC School Fund in response to the complaint made by Hayat Khan Son of Khazanat Khan District Bannu which was resulted into inquiry against the appellant along with a show cause notice dated 13-08-2021 with the attached as *Annexure-A* for ready reference.
- 4 That Para-4 is pertains to the Bank record, wherein, a joint account of PTC Fund has been open by the appellant but no check Book or reference/particulars of the bank has been mentioned by the appellant just to avoid embezzlement as mentioned in the show cause notice dated 13-08-2021.
- 5 That Para-5 is also incorrect & denied on the grounds that the appellant has been found guilty of corruption to the tune of Rs. 390000/- in the PTC Fund allocated by the Govt; for the said School, therefore, a formal inquiry was conducted vide Notification dated 22-10-2019 by the Respondent No. 2 through Miss Shazia Nawaz Deputy District Education Officer (F) Tank, who submitted her inquiry report vide her office letter No. 07 dated 21-11-2019 *Annexure-B* along with the formal inquiry report with the recommendations that:-
  - i. All amount illegally drawn & utilized may be recovered from both the accused.
  - ii. Both the accused may be proceeded against the Rule-3 & 4 of KPK Rules 2011.
  - iii. Mst. Shahna Hameed being an employee of teaching cadre may be adjusted at any school she has been found misfit for administration or office duties. *(Copy of the inquiry report dated 21-11-2019 is attached as Annexure-C).*
- 6 That Para-6 is incorrect that as per findings of the inquiry officer that the record & Bank statements show that Rs. 1547500/- were allocated & released to the account of GGCMS Hayat Mohammad Khel Bannu as per detail mentioned vide S.No. *C* in the inquiry report already attached as *Annexure-C* & is self-explanatory, hence, the plea of the appellant is misleading & against the factual position of the titled case which was resulted in the passing of an order dated 30-06-2021 by the Respondent No.3 with the direction to the appellant for the repayment of embezzlement amount of Rs. 390000/- in view of the Notification dated 02-09-2020 of the Respondent No.3 which are attached as *Annexure-D & E*.
- 7 That Para-7 is incorrect as the appellant is trying to cover up her financial corruption as proved by the inquiry officer against the appellant by taking an untraced issue having no cogent record in support of her plea, hence, liable to be rejected.
- 8 That Para-8 is incorrect & misleading as the inquiry report dated 21-11-2019 is in field against the appellant as referred above.
- 9 That Para-9 is correct to the extent of the nomination of the inquiry against the appellant vide notification dated 20-10-2019 who submitted her inquiry report on 21-11-2019 with the recommendations as mentioned in para-5, hence, the claim of the appellant is illegal & liable to be rejected.

- 10 That Para-10 is also incorrect that the inquiry report dated 21-11-2019 is the result of due process of law Rules & criteria.
- 11 That Para-11 is correct to the extent of the order dated 30-06-2021 in the light of the inquiry report dated 21-11-2019, where against, no Departmental appeal has been filed by the appellant till date, hence, got finality under the law.
- 12 That para-12 is also incorrect as the appellant is not an aggrieved person, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia:-

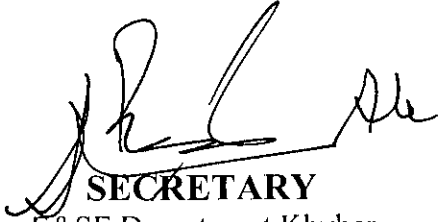
ON GROUNDS.

- A. Incorrect & not admitted. on the grounds that the plea of the appellant is illegal as she was been treated as per law & rules by the Department.
- B. Incorrect & not admitted. The act of the Department with regard to the Notifications dated 30-06-2021 & 02-09-2021 is within legal parameter.
- C. Incorrect & not admitted. The appellant has been treated as per Law & Rules & prescribed policy & criteria by the Department vide the Notification as cited above.
- D. Incorrect & not admitted. As replied above.
- E. Incorrect & not admitted. The act of the Department with regard to the Notifications dated 30-06-2021 & 02-09-2021 is within legal parameter
- F. Incorrect & not admitted. The inquiry report dated 21-11-2019 is within legal parameter.
- G. Incorrect & not admitted. The plea of the appellant is illegal.
- H. Incorrect & not admitted. The appellant has been treated as per law & in view of the inquiry report dated 21-11-2019 which is legal.
- I. Incorrect & not admitted. The plea of the appellant is illegal as she has been found guilty of misconduct & corruption by the competent authority.
- J. Incorrect & not admitted. The plea of the appellant is illegal as she has been found guilty of misconduct & corruption by the competent authority
- K. Incorrect & not admitted. The stand of the appellant is illegal as she could not made out her case before the inquiry officer. Therefore, the Respondent also seek leave of this Learned Bench to submit additional grounds/record & case law at the time of hearing.

**PRAYER.**

Therefore, in view of the above made submissions, the appeal in hand may kindly be dismissed in favor of the respondent in the interest of justice.

Dated 16/05/2023.



**SECRETARY**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 1).



**DIRECTOR**  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 2 & 3).

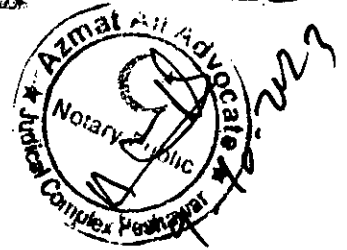
**AFFIDAVIT**

**I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE**  
Department do hereby solemnly affirm and declare On oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.



Deponent

**ATTESTED**





(5)

**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**

No. \_\_\_\_\_ /A-17/SST/F/Complaint/General Cases/2019  
Dated Peshawar / /2021.

**SHOW CAUSE NOTICE**

I, Hafiz Muhammad Ibrahim Director Elementary & Secondary Education Khyber Pakhtunkhwa as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve upon you Mst. Gul Shireen SST GGCMS Hayat Muhammad Khel Bannu, as follows:-


- 1 That as per the complaint lodged by Mr. Hayat Khan, resident of Hayat Muhammad Khel Bannu, vide No. Nill dated: 27-08-2019, you have been charged for corruption in the school fund.
- 2 That in response to the complaint, an inquiry was ordered by this office vide No.1849-51/A-12/Complaint/Vol-15 dated: 22-10-2019.
- 3 That the inquiry officer proved the allegations of corruption by you in her report vide No. 07 dated: 21-11-2019.
- 4 That this office impose penalty of Censure and recovery of whole amount illegal drawn and embezzled by you, i.e., Rs.390000/- under Rule 4 (a) (i) and (iii) vide this office notification No. 2114-19 A-17/SST/F/Complaint/General Cases/2019 dated: 02-09-2020.
- 5 That this office directed the DEO (F) Bannu to recover the above mentioned amount from you vide this office letter No.4590 dated: 28-01-2021 and subsequent reminder vide letter No.10084 dated: 26-03-2021 but you failed to deposit the same amount into the Government treasury.
- 6 That the competent authority is satisfied that you have once again committed acts/omissions specified in Rule-3 (b) & (c), i.e.
  - i. "Guilty of misconduct".
  - ii. "Guilty of corruption".
- 7 Therefore, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, I as the Competent Authority have tentatively decided to impose upon you any of the penalties mentioned in Rule-4 of the ibid rules.
- 8 You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- 9 If no reply to this show cause is received within 7 days of its receipt, it shall be presumed that you have no defense to put in and, in that case, an Ex-Parte decision will be taken against you.

Director  
Competent Authority  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

2116-19  
12/08/2021  
Endst:of Even No. & Date.

Copy of the above is forwarded for information to the:-

1. PA to Director E&SE Peshawar.
2. District Education Officer (F) Bannu with the direction to serve the show notice upon the teacher concerned under intimation to this office.
3. Principal/HM GGCMS Hayat Muhammad Khel Bannu.
4. Mst. Gul Shireen SST GGCMS Hayat Muhammad Khel Bannu.
5. Office Copy.

  
Director  
Competent Authority  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar





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

Phone: 0927-291177  
Address: KDA Karak  
Email: deof.emalekarak@yahoo.co

No. 07

Dated Tank the: 21/11/2019

To

The Director ES&E Department  
Khyber Pakhtunkhwa, Peshawar

Subject: **ENQUIRY REPORT**

Memo

Reference to your letter No. 1849-S1/A-12/Complain/Vol-15-A dated Peshawar the 22-10-2019. Enclosed find here with Enquiry report consists of (04) pages along with supporting documents (17 pages) for further necessary process as desired please.

Enclos: (As above).

**Shazia Nawar**  
DDEO (F) Karak / Enquiry Officer.

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**ENQUIRY REPORT**

**TITLE OF ENQUIRY:**

Enquiry on the complaint lodged by Mr. Hayat Khan S/O Gul Khazanat village Hayat Muhammad Khel Bannu.

**ENQUIRY OFFICER:**

Mst. Shazia Nawaz Deputy District Education Officer (Female), Karak.

**BACK GROUND OF ENQUIRY:**

A complaint application lodged by Mr. Hayat Khan was received to the Director Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar regarding corruption of Rs:1674350/- in PTC funds utilized by the ADEO(Estb) Mst. Shahna and Ex Head Mistress Gul Shareen GGMS/GCMS Hayat Muhammad Khel Bannu.

The Director Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar vide letter No. 1849-51/A-12/Complaint/Vol-15 A dated Peshawar the: 22-10-2019 appointed the above mentioned officer to probe into the matter and submit detail report along with clear finding and recommendations.(Annex A P 1-3)

**PROCEDURE OF ENQUIRY:**

The enquiry officer visited office of the District Education officer (Female), Bannu and GGMS/GCMS Hayat Muhammad Khel Bannu.

All the available record pertaining to the enquiry was obtained from office of the DEO (F), Bannu. PTC record pertaining to the enquiry was also obtained from Head Mistress GGMS/GCMS Hayat Muhammad Khel Bannu and was thoroughly examined. The work done under PTC as mentioned in the record was physically checked. Questionnaires were served upon both the Ex-Head Mistress GGMS/GCMS Hayat Muhammad Khel Bannu and ADEO Ast: Office of the DEO (F) Bannu. Ample time for personal hearing and defense was also provided to both the accused. Their written replies to the questionnaire served upon them were also obtained.

**OBSERVATIONS:**

The office record/Bank statement reveals that Rs. 1547500/- were allocated and released to the PTC account of GGMS/GCMS Hayat Muhammad Khel Bannu as per detail mentioned below. It is pertinent to mention that both the schools are running in the same building. (Annex B P 4-6)

**GGCMS HAYAT MUHAMMAD KHEL BANNU**

S.No	Name of Facility	Amount released PTC Account	Year
1	Water Supply	200000/-	2014-15
2	Raising of boundary wall	627500/-	2014-15
3	Group latrine	160000/-	2014-15
4	Play area	120000/-	2015-16

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5	Group latrine+ Electrification	180000/-	2015-16
	Total Amount released	1287500/-	

GGMS HAYAT MUHAMMAD KHEL BANNU			
S.No	Name of Facility	Amount released PTC Account	Year
1	Raising of Boundary Wall	100000/-	2014-15
2	Purchase of Sports Gears	10000/-	2014-15
3	Furniture Repair	60000/-	2015-16
	Total Amount released	260000/-	

**1. GGCMS HAYAT MUHAMMAD KHEL BANNU.**

Mst Gul Shareen SST Head Mistress GGCMS Hayat Muhammad Khel Bannu has been Secretary of PTC since 01-11-2014 to 14-11-2015. She has drawn and utilized Rs. 987000/-. In her statement she verified the allocation of funds for the facilities mentioned above. The work done against the funds allocated, released and drawn was properly examined. It was found that Rs. 627500/- utilized for raising of boundary wall with barbed wire on its top, construction of security point, white wash and minor repair of the building as stated by the head mistress and secretary PTC are justified. However the funds allocated for the Group Latrine Rs. 160000 has not been utilized and thus no lavatory has been constructed. As far as the funds allocated for water supply concerned, some pipe lining has been made and approximately 1/3 (70000) of the total released amount has been utilized. while the rest of the amount Rs.130000/- cannot be justified by the accused.

According to the statement of the accused the funds allocated for Group Latrine have been utilized on the repair of old lavatories in stead of construction new ones. She further stated that one old type of well already existed in the school was excavated and pipe lines were made, utilizing Rs. 200000/- for this purpose. However her statement is not reasonable and justifiable. She further stated that the work has been done by the land owner. However she could not provide any proof of work assigned or payment made to the land owner. (Annex C P 7-10)

Hence Rs. 130000 + 160000 total 290000/- has been misused by the accused Mst Gul Shareen with huge loss to the public exchequer. The accused also provided the Vouchers of utilization of funds on irrelevant items of stationary, purchase of miscellaneous and class consumable items. It is worth mentioning that funds for all such items has been allocated through regular PTC funds other than the conditional grant. The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate.

Mst: Shanna Hameed ADEO Estb: has exercised her authority as secretary PTC of this school though she had not been working in this school and her attendance could not be verified in this school. She had been at the office of the SDEO working as ASDEO since her appointment as SST at GGMS Haya:

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Muhammad Khel Bannu, However she had been exercised the power of secretary PTC of this school illegally and unlawfully.

She has drawn Rs. 300000/- from the PTC account of this school allocated for play area, group latrine and electrification (120000, 160000, 20000). In her statement she refused to have exercised authority as secretary PTC or drawn any amount. (Annex D P 11-12)

The work done under these facilities was examined and it was found that only 120000 has been utilized under play area while the rest of amount of Rs. 180000 drawn by Mst: shahna ASDEO has not been utilized. However she has managed to produce fake vouchers for utilization of the same amount duly signed by a teacher being her subordinate but irrelevant and unauthorized to utilize the same amount, which is gross inefficiency and violation of financial procedure on the part of the accused. In her written statement she also admitted that she had not been working at any school since 01-09-2014 till date and has been working as ASDEO in the office of the SDEO and DEO till date.

Hence it is clear that she being ASDEO has misused her authority by drawing Rs. 300000/- from the PTC account of GGMS Hayat Muhammad Khel Bannu and also misusing Rs. 180000. The chairperson of PTC denied her signature on the cheque as well as on the vouchers. (Annex E P 13-14) The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate.

## 2. GGMS HAYAT MUHAMMAD KHEL BANNU.

As per available record and bank Statement for the Year 2014-15 and 2015-16 Rs. 260000 has been credited to the PTC Account GGMS Hayat Muhammad Khel ( Rs. 100000 for barbed wire on boundary wall, Rs.100000 for Purchase of sports gears and Rs.60000 for furniture repair.) However Rs. 100000/- for Boundary wall and Rs. 100000/- for sports drawn by Mst: Shahana Hamid and has not been properly utilized. Rs. 60000/- for furniture repair drawn by Mst Gul Shareen and has not been properly utilized. All the amount Rs. 260000/- has not been properly utilized. However the accused produced some irrelevant vouchers showing utilization of the said amount, which are not reasonable and could not be justified. The chairperson of PTC denied her signature on the cheque as well as on the vouchers. The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate. Vouchers are available showing all the funds utilized but neither sports gears are purchased nor furniture has been repaired.

Hence it is clear that all the amount Rs. 260000/- has been misused by the accused with huge loss to the public exchequer. (Annex F 15-17)

### FINDINGS:

In view of the above narrated facts, perusal of available office record and physical examination of the work done under PTC in both the schools i.e GCMS Hayat Muhammad Khel Bannu and GGMS Hayat Muhammad Khel Bannu running in the same building has come to the conclusion that:

1. Rs. 390000/- has been misused by the accused Mst Gul Shareen Ex- Head Mistress GCMS and GGMS Hayat Muhammad Khel Bannu which are recoverable.

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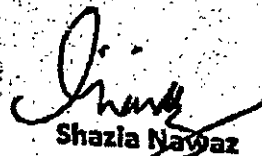
2. Rs. 80000/- has been misused by Mst Shahana Hameed ASDEO establishment O/O DEO (Female) Bannu she has also been misused her authority and violated the financial procedure.

Hence all the amount used illegally and unlawfully needs to be recovered from the accused and both of them are liable to be proceeded against for their inefficiency, violation of financial procedure and corruption which are tantamount to misconduct.

**RECOMMENDATIONS:**

It is hereby recommended that:

1. All the amount illegally drawn and utilized may be recovered from both the accused.
2. Both the accused may be proceeded against under rule 3 and 4 of Khyber Pakhtunkhwa Govt Servant E&D rules 2011.
3. Mst. Shahana Hameed being an employee of teaching cadre may be adjusted at any school as she has been found misfit for administration or office duties.



Shazia Nawaz  
DDEO (F) Karak/Enquiry Officer.



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE) BANNU.

11

NO. 3679-B11

Dated Bannu the 30/06/2021

TO,

- 1- Principal, GGHSS NO.2. Bannu City.
- 2- Headmistress, Bada Mir Abbas

Subject: -

RECOVERY IN RESPECT OF MST: GUL SHREEN SST (EX: HM) GGMS HAYAT MUHAMMAD KHEL & MST: SHAHANA Hamid EX; ADEO (ESTAB) O/O DEO (FEMALE) BANNU.

Memo:-

Reference Directorate of E & SE Khyber Pakhtunkhwa Peshawar

Notification Endst: NO. 2114-19 and 2108-13 Dated 02/09/2020.

It is stated for your kind information that may please be start recovery from her salaries, of the above subject teachers i.e. Gul Shreen SST (Ex: HM) GGMS Hayat Muhammad Khel & Mst: Shahana Hamid (Ex: ADEO Establishment) of this office, detail of recovery are as under.

- 1- Mst: Gul Shreen SST. Rs, 390000
- 2- Mst: Shahana Hamid SST. Rs, 380000

Copy of Pay Slips of the concerned teachers, & initiation of your disciplinary action may reached to the undersigned office in five days positively.

*Sunway*  
District Education Officer,  
(Female) Bannu.

Endst: NO. \_\_\_\_\_ / Dated Bannu the \_\_\_\_\_ / 2021.

Copy for information to the:-

- 1- Director of Elementary and Secondary Education KPK Peshawar.

*Sol*  
District Education Officer,  
(Female) Bannu.

*26/7/21*



**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR**

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**NOTIFICATION**

1. WHEREAS, A complaint was received from Mr. Hayat Khan S/O Khazanat Khan, resident of Hayat Muhammad Khel, District Bannu, lodged against Ms. Shahana Hameed, ADEO (F) Establishment office of DEO (F) Bannu vide No. 1776 dated: 22-08-2019.
2. AND WHEREAS, Mst; Shahzia Nawaz Deputy DEO (F) Karak was nominated as an inquiry officer vide this office Notification No. 1849-51/A-12/Complaint/Vol-15A dated 22-10-2019..
3. AND WHEREAS, the inquiry officer, after having examined the charges and evidence on the record including her personal defense, submitted the inquiry report vide letter No.07 dated 21-11-2019.
4. AND WHEREAS, Show Cause Notice was issued to Ms. Shahana Hameed, ADEO (F) Establishment office of DEO (F) Bannu vide this office Notification No.9093-95 dated: 31-12-2019.
5. AND WHEREAS, considered the charges, evidence on the record and giving the opportunity of personal hearing/appearing in person to the accused ADEO, the Competent Authority is of the view that the charges leveled against her have been proved.
6. NOW THEREFORE, in exercise of power conferred under the E&D Rules,2011, the Competent Authority has been pleased to impose minor penalty of CENSURE and recovery of whole amount illegal drawn and utilized by the Ms. Shahana Hameed, ADEO (F) Establishment office of DEO (F) Bannu i.e., 380000 under Rule 4 (a) (i) and (iii) of the Ibid Rules.

Note:Ms. Shahana Hameed SST will not be adjusted at any Administrative Post in future.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 2114-19 /A-17/Complaint/General Cases/2019. Dated: 22/10/2020  
Copy forwarded for information and necessary action to the: -

- 1 Private Secretary to Minister for Elementary & Secondary Education Khyber Pakhtunkhwa w.r to letter No. PS/Minister/E&SE/KPK/2020 dated: 13-07-2020.
- 2 District Education Officer (F) Bannu with the remarks to recover whole amount illegal drawn and utilized by the accused teacher under intimation to this office.
- 3 District Accounts Officer Bannu.
- 4 Principal/Head Mistress of GGHS No.02 Bannu.
- 5 Principal/Head Mistress of GGCMS Hayat Muhammad Khel Bannu.
- 6 Teacher Concerned.
- 7 Master file.

*For*  
*Director*  
*22/9/2020*  
Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

*21/9/2020*