

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Shakeen Begum vs Secretary Education etc.

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Peer Amjad Ali Shah AHC</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Whether Counsel / Appellant / Respondent / Department have signed the requisite documents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	Whether Appeal is within time?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Whether the enactment under which the appeal is filed mentioned?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Whether the enactment under which the appeal is filed is correct?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Whether affidavit is appended?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Whether affidavit is duly attested by competent commissioner?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.	Whether appeal/annexures are properly paged?	<input type="checkbox"/>	<input type="checkbox"/>
9.	Whether certificate regarding filing any earlier application on the subject, furnished?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.	Whether annexures are legible?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Whether annexures are attested?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12.	Whether copies of annexures are readable/clear?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13.	Whether copy of appeal is delivered to A G D A of	<input type="checkbox"/>	<input type="checkbox"/>
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	<input type="checkbox"/>	<input type="checkbox"/>
15.	Whether numbers of referred cases given are correct?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Whether appeal contains cuttings/overwriting?	<input type="checkbox"/>	<input type="checkbox"/>
17.	Whether list of books has been provided at the end of the appeal?	<input type="checkbox"/>	<input type="checkbox"/>
18.	Whether case relate to this Court?	<input type="checkbox"/>	<input type="checkbox"/>
19.	Whether requisite number of spare copies attached?	<input type="checkbox"/>	<input type="checkbox"/>
20.	Whether complete spare copy is filed in separate file cover?	<input type="checkbox"/>	<input type="checkbox"/>
21.	Whether addresses of parties given are complete?	<input type="checkbox"/>	<input type="checkbox"/>
22.	Whether index filed?	<input type="checkbox"/>	<input type="checkbox"/>
23.	Whether index is correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24.	Whether Security and Process fee deposited? on	<input type="checkbox"/>	<input type="checkbox"/>
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on	<input type="checkbox"/>	<input type="checkbox"/>
26.	Whether copies of comments/reply/rejoinder submitted on	<input type="checkbox"/>	<input type="checkbox"/>
27.	Whether copies of comments/reply/rejoinder provided opposite party? on	<input type="checkbox"/>	<input type="checkbox"/>

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Peer Amjad Ali Shah
AHC

Signature:

Dated:

13-2-2023

0333 898 7171

peeramjadalishah@gmail.com

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 1951/2023

Shaheen Begum

VERSUS

Secretary Education etc.

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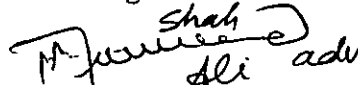
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Jan 28, 2023

Your Humble Petitioner


Shaheen Begum

Through Counsel


Pir Amjad Ali Shah
Advocate High Court
DBA. Dera Ismail Khan

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 1951/2023

Shaheen Begum D/o Mumtaz Ali Shah w/o Mushataq Ahmed Shah PST
(BPS-12) GGPS Shezada Humayun Kot Ladha SWTD
(Petitioner)

Versus

1. Secretary Education Khyber Pakhtunkhwa Peshawar.
2. Director General Education Khyber Pakhtunkhwa Peshawar.
3. Director Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer (F) South Waziristan Tribal District.
5. District Account Officer South Waziristan Tribal District.

(Respondent)

**APPEAL UNDER Section 4 Of KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974 AND OTHER PROMULGATED RULES,
SERVICE RENDERED BY THE PETITIONER SINCE 2004 SHOULD
BE CONSIDERED AFTER REGULARIZATION OF SERVICE OF
THE PETITIONER TO THE EXTENT OF PENSIONARY BENEFIT.**

Respectfully Submitted;

1. That the petitioner has been appointed vide office order No. 7110-14 Dated Tank 24/05/2004 by the Agency Education Officer South Waziristan Tank upon recommendation of Chairperson of the school concerned, after selection in interview conducted by the selection committee and approved by the then Political Agent South Waziristan Agency and the petitioner posted against the post PTC (BPS-07) on vacant post in the Government Communal School GFCS Shugai Galishai in Tehsil Sararogha South Waziristan. Copy of Office Order NO.7110 dated 24/05/2004 is enclosed as ANNEXURE A.
2. That the petitioner performed her duties with due diligence, regularly and punctually. The whole service of the petitioner is spotless and there is no complaint, whatsoever, against the petitioner.
3. That the Government of Khyber Pakhtunkhwa issued Notification No. SO(e)/SSD/CSTR/99-08 dated 11/05/2012 issued by FATA Secretariat Social Sector Department and Director Education, FATA Memo No. 8964-76 dated 28/06/2012 vide which lot of employees has been regularized. The afore mentioned policy/ notification has also been adopted by the education department and the petitioner along-with likewise employees ordered to be regular vide Appointment Order No.

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No.

Shaheen Begum D/o Mumtaz Ali Shah w/o Mushataq Ahmed Shah PST
(BPS-12) GGPS Shezada Humayun Kot Ladhā SWTD
(Petitioner)

Versus

- Khyber Pakhtunkhwa
Service Tribunal
Diary No. 3351
Dated 31-1-2023
1. Secretary Education Khyber Pakhtunkhwa Peshawar.
 2. Director General Education Khyber Pakhtunkhwa Peshawar.
 3. Director Education Khyber Pakhtunkhwa Peshawar.
 4. District Education Officer (F) South Waziristan Tribal District.
 5. District Account Officer South Waziristan Tribal District.

(Respondent)

**APPEAL UNDER KHYBER PAKHTUNKHWA CIVIL SERVANT
ACT AND OTHER PROMULGATED RULES, SERVICE RENDERED
BY THE PETITIONER SINCE 2004 SHOULD BE CONSIDERED
AFTER REGULARIZATION OF SERVICE OF THE PETITIONER
TO THE EXTENT OF PENSIONARY BENEFIT.**

Respectfully Submitted;

- Filed to-day**
Registrar
31/1/23
1. That the petitioner has been appointed vide office order No. 7110-14 Dated Tank 24/05/2004 by the Agency Education Officer South Waziristan Tank upon recommendation of Chairperson of the school concerned, after selection in interview conducted by the selection committee and approved by the then Political Agent South Waziristan Agency and the petitioner posted against the post PTC (BPS-07) on vacant post in the Government Communal School GFCS Shugai Galishai in Tehsil Sararogha South Waziristan. Copy of Office Order NO.7110 dated 24/05/2004 is enclosed as ANNEXURE A.

2. That the petitioner performed her duties with due diligence, regularly and punctually. The whole service of the petitioner is spotless and there is no complaint, whatsoever, against the petitioner.

3. That the Government of Khyber Pakhtunkhwa issued Notification No. SO(e)/SSD/CSTR/99-08 dated 11/05/2012 issued by FATA Secretariat Social Sector Department and Director Education, FATA Memo No. 8964-76 dated 28/06/2012 vide which lot of employees has been regularized. The afore mentioned policy/ notification has also been adopted by the education department and the petitioner along-with likewise employees ordered to be regular vide Appointment Order No.

②

296-309/dated Tank 13/07/2020 Wherein name of the petitioner is on serial No.07. copy of appointment order No. 296-309/dated 13/07/2020 is enclosed as **ANNEXURE B.**

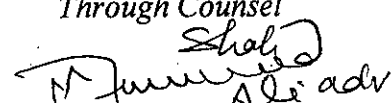
4. That the petitioner performing her duties since 24/05/2004 from the dated of her first appointment without any break and the effect of the regularization should be given from the date of her first appointment for the purpose of pensionary benefits and other allowance as the superior courts issued directions time and time again in this respect. The service rendered by the petitioner since 2004 should be considered after regularization of service of the petitioner for the pensionary benefit. Copy of Service Book Is enclosed as **ANNEXURE C.**
5. That the petitioner submitted departmental appeal through proper channel dated 28/09/2022 but the competent authority took no action, feeling aggrieved from the same the petitioner approaches this Honourable court inter alia.

It is therefore, Humbly requested that in view of the above submissions the service of the petitioner may kindly be considered from 24/05/2004 for the pensionary benefits and other allowances.

Dated: 28/01/2023

Your Humble Petitioner


Shaheen Begum

Through Counsel

Pir Amjad Ali Shah
Advocate High Court
DBA. Dera Ismail Khan

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No.

Shaheen Begum

VERSUS

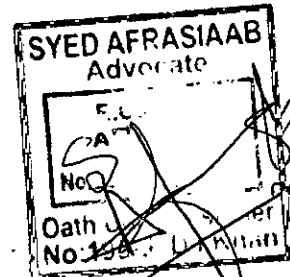
Secretary Education etc

AFFIDAVIT

I, Shaheen Begum D/o Mumtaz Ali Shah w/o Mushataq Ahmed Shah PST (BPS-12) GGPS Shezada Humayun Kot Ladha SWTD, do hereby solemnly affirm and declare on Oath that the contents of service appeal are true and correct and nothing has been concealed from this Honorable Court.

Deponent

Signature



(3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Shaheen Begum

VERSUS

Secretary Education etc.

Application for condonation of delay

Respectfully submitted;

Humble submissions of the petitioner/appellant are as under;

1. That the petitioner/appellant is going to file the above titled service appeal before this Honourable court and the instant application may kindly be considered as part and parcel of the same.
2. That the petitioner filed a departmental appeal before the Secretary Education Khyber Pakhtunkhwa Peshawar on 28-09-2022 but the petitioner could not file the above titled service appeal within time due to family issues, because of which, the above titled appeal is time barred by 2 days.
3. That the above titled service appeal is only time barred by 2 days and that too due to the family problems and in the interest of justice this condonation of delay may kindly be accepted.
4. That this Honourable court has got ample power and it is within the jurisdiction of this Honourable court to accept the instant petition.

It is therefore humbly prayed that the instant petition may kindly be accepted and the above titled appeal be admitted.

Dated: 28-01-2023

Your Humble Petitioner

Shaheen Begum

Seg

Through Counsel

Shah

M. J. Ali

Pir Amjad Ali Shah

Advocate High Court

DBA.Dera Ismail Khan

(4)

Through Proper Chanel

To

The Director Education
Khyber Pakhtunkhwa
Peshawar.

Subject: **Departmental Appeal**

Respectfully Submitted;

1. That the appellant has been appointed vide office order No. 7110-14 Dated Tank 24/05/2004 by the Agency Education Officer South Waziristan Tank upon recommendation of Chairperson of the school concerned, after selection in interview conducted by the selection committee and approved by the then Political Agent South Waziristan Agency and the appellant posted against the post PTC (BPS-07) on vacant post in the Government Communal School GFCS Shugai Galishai in Tehsil Sararogha South Waziristan. Copy of Office Order NO. 7110 dated 24/05/2004 is enclosed as **ANNEXURE A**.
2. That the appellant performed her duties with due diligence, regularly and punctually. The whole service of the appellant is spotless and there is no complaint, whatsoever, against the appellant.
3. That the Government of Khyber Pakhtunkhwa issued Notification No. SO(e)/SSD/CSTR/99-08 dated 11/05/2012 issued by FATA Secretariat Social Sector Department and Director Education, FATA Memo No. 8964-76 dated 28/06/2012 vide which lot of employees has been regularized. The afore mentioned policy/ notification has also been adopted by the education department and the appellant along-with likewise employees ordered to be regular vide Appointment Order No. 296-309/dated Tank 13/07/2020 Wherein name of the appellant is on serial No. 07. copy of appointment order No. 296-309/dated 13/07/2020 is enclosed as **ANNEXURE B**.
4. That the appellant performing her duties since 24/05/2004 from the dated of her first appointment without any break and the effect of the regularization should be given from the date of her first appointment for the purpose of pensionary benefits and other allowance as the superior courts issued directions time and time again in this respect. The service rendered by the appellant since 2004 should be considered after

23
28-9-2022

(5)

regularization of service of the appellant for the pensionary benefit.
Copy of Service Book Is enclosed as ANNEXURE C.

It is therefore, Humbly requested that in view of the above submissions the service of the appellant may kindly be considered from 24/05/2004 for the pensionary benefits and other allowances.

Dated: 28/9/2022

Your Humble Appellant



Shaheen Begum
PST (BPS-12) GGPS
Shezada Humayun Kot
Ladha SWTD

(6) Annexure "A"

AGENCY EDUCATION OFFICER, SOUTH WAZIRISTAN AGENCY, TANK.

APPOINTMENT OF TEACHING STAFF IN GOVERNMENT COMMUNAL SCHOOLS IN S.W. AGENCY.

OFFICE ORDER

Consequent upon recommendation by the Chair Person of the School concerned, selected in the Interview by the Selection Committee and Approved by the Political Agent, South Waziristan Agency vide memorandum No. 3728/Dev-2 (C.S), dated Tank the 22nd May, 2004.

The following candidates are hereby appointed as PTC Teachers in BPS 7 on Fixed Pay with allowances against vacant posts in the newly established Government Communal Schools in South Waziristan Agency on **CONTRACT BASIS FOR THE PROJECT PERIOD :-**

S.No	Name of Candidate with Father's Name	Name of School
1	SHAHIN AKHTAR D/O MUMTAZ KHAN	GFCS SHUGAI GALISHAI, TEHSIL SARAROGHA
2	SALMA RANI D/O ZAR KHAN	GFCS MALIK MASHAD KHAN KOT, TEHSIL TOL KHULLAH

TERMS AND CONDITIONS.

- 1 Charge reports should be submitted to all concerned in duplicate.
- 2 TA/DA etc is not allowed.
- 3 The appointment of the candidates are being made on purely temporary basis on **CONTRACT BASIS FOR THE PROJECT PERIOD** and is liable to termination at any time with out assigning any reason. In case they wish to resign their posts they shall have to give one month's prior notice or forfeit one month's pay in lieu thereof.
- 4 The original Academic/Professional and Educational Certificates, Domicile Certificates, N.I.C., and date of birth Certificates should be checked before their taking over Charge. After taking over Charge too, their monthly salaries will not been drawn till verification of their all documents from the Institutions concerned
- 5 They should produce Health and Age Certificate from the Medical Superintendent Wana SWA on the day of taking over charge
- 6 They should not be handed in charge of the post if they are below 18 years or above 33 years and 40 years in case of female candidates
- 7 The pay scales and services Rules would be subject to revision in accordance with the orders to be issued by the Government of N.W.F.P. time to time for Communal School Teachers
- 8 The concerned authorities should get verified their classification roll of character and antecedents and the same might be kept on office file
- 9 If they fail to report their arrival for taking over charge within 15 days their appointment order will be treated as cancelled
- 10 If they failed to perform regular duties and remained absent continuously for two days with out obtaining permission from the Agency Education Officer concerned then their appointment order will be automatically stand cancelled and there will be no need of observing any other formalities
- 11 Land donor of the school will be bound to report their regularities, punctuality's and performance of sound duties.
- 12 They will have to sign an agreement form on stamp paper which will also be signed by the Chair person of the School concerned

AGENCY EDUCATION OFFICER,
SOUTH WAZIRISTAN AGENCY, TANK

ENDST NO. 7110-14 DATED TANK THE 24/5 2004

Copy forwarded to:

- 1 The Director of Education, FAT/A, NWFP, Peshawar.
- 2 The Political Agent, South Waziristan Agency, Tank with reference to his memo quoted above.
- 3 The Agency Accounts Officer, South Waziristan Agency, Tank.
- 4 The Pay Clerk local Office, Tank
- 5 The candidate concerned.

AGENCY EDUCATION OFFICER,
SOUTH WAZIRISTAN AGENCY, TANK

BETTER COPY

OFFICE OF THE AGENCY EDUCATION OFFICER, SOUTH WAZIRISTAN AGENCY, TANK.

Subject: APPOINTMENT OF TEACHING STAFF IN GOVERNMENT COMMUNAL SCHOOLS IN S.W.AGENCY

OFFICE ORDER

Consequent upon recommendation by the chairperson of the school concerned, selected in the interview by the selection committee and approved by the Political agent South Waziristan Agency vide memorandum No.3728/Dev-2(C.S), Dated Tank the 2nd May 2004.

The following candidates are hereby appointed as PTC teachers in BPS-7 on fixed pay with allowances against vacant posts in the newly established government communal schools in south Waziristan agency on CONTRACT BASIS FOR THE PROJECT PERIOD:-

SR. NO.	NAME OF CANDIDATE WITH FATHER'S NAME	NAME OF SCHOOL
1	SHAHIN AKHTAR D/O MUMTAZ KHAN	GFCS SHOGAI GALISHAI, TEHSIL SARAROGHA
2	SALMA RANI D/O ZAR KHAN	GFCS MALIK MASHAD KHAN KOT, TEHSIL TOI KHULA

TERMS AND CONDITIONS

1. Charge reports should be submitted to all concerned in duplicate.
2. TA/DA etc is not allowed.
3. The appointment of candidates are being made on purely temporary basis on CONTRACT BASIS FOR THE PROJECT PERIOD and is liable to termination at any time without assigning any reason. In case they wish to resign there post they shall have to give one months prior notice or forfeit one months pay in lieu thereof.
4. The original academic/ professional and educational certificates, domicile certificates, NIC and date of birth certificates should be checked before their taking over charge. After taking over charge too, their monthly salaries will not be drawn till verification of their all documents from the institutions concerned.
5. They should produce health and age certificate from the medical superintendent WANA,SWA on the day of taking over charge.
6. They should not be handed over charge of the post if they are below 18 years or above 33 years and 40 years in case of female candidates.
7. The pay scales and service rules would be subject to revision in accordance with the orders to be passed by the government of NWFP, time to time for the communal school teachers.
8. The concerned authorities should get verified their verification roll of character and antecedents and the same might be kept on office record.
9. If they fail to report their arrival for taking over charge within 15 days their appointment order shall be treated as canceled.
10. If they failed to perform regular duties and remained absent continuously for 2 days without obtaining permission from the agency education officer concerned then their appointment order will be automatically stand cancelled and there will be no need of observing any other formalities.
11. Land donor of the school will be bound to report their regularities, punctuality's and performance of sound duties.
12. They will have to sign an agreement form on stamp paper which will also be signed by the chairperson of the school concerned.

AGENCY EDUCATION OFFICER
SOUTH WAZIRISTAN AGENCY, TANK

ENDST NO. _____ DATED TANK THE _____/2004

Copy forwarded to

1. The Director Education, FATA, NWFP Peshawar.
2. The Political Agent, South Waziristan, Tank with reference to his memo quoted above.
3. The Agency Accounts Officer, South Waziristan Agency Tank.
4. The Pay Clerk Local Office, Tank.
5. The candidate concerned.

AGENCY EDUCATION OFFICER
SOUTH WAZIRISTAN AGENCY, TANK

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OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT SOUTH WAZIRISTAN, AT TANK

Annexure "B"

RE-APPOINTMENT ORDER:-

In light of the notification No. SO(E)/SSD/CSTR/99-108, dated 11.05.2012 issued by FATA Secretariat, Social Sectors Department and Director of Education, FATA memo No. 8964-76, dated the 28th June, 2012, the following female PTC Teachers serving in Community Schools are hereby re-appointed as regular PST in BPS-12 plus usual allowances as admissible under the rules purely on temporary basis with effect from 01.07.2020. The appointments have been made on Tehsil-wise merit policy against the vacant PST posts in regular schools in the interest of the public service:-

S. NO.	NAME WITH FATHERS NAME	NAME OF SCHOOL WHERE APPOINTED	TEHSIL	REMARKS
01	Miss Zunaira Khan D/O Muhammad Naeem Khan, PST, GFCS Gul Munir Kot	GGPS Lal Muhammad kot Tehsil Wana	Wana	Tehsil wise merit, Newly created PST Post at GGPS Lal Muhammad Kot Tehsil Wana
02	Miss Azmeena Bibi D/O Mumtaz Khan, PST, GFCS Nashed Kot Makin	GGPS Shawa Badiwai Tehsil Sararogha	Sararogha	Tehsil wise merit Miss Rubina Azam PST Transferred to Newly created PST Post at GGPS, Balta Khan Kot Tehsil Sararogha vide this office No. 3483-96 dated 06.07.2020
02	Miss Famida Rahim D/O Dr Said Rahim, PST, GFCS Hatta Khan Kot	GGPS Shankai Tehsil Sararogha	Sararogha	Tehsil wise merit Miss Tahera Shoukat PST Transferred to Newly created PST Post at GGPS, Khalil Kai Khel Kot Tehsil Sararogha vide this office No. 3489-96 dated 06.07.2020
03	Miss Samina Hamidai D/O Abdul hamid, PST, GFCS Hazrat Ali Kot	GGPS Safdar kot Tehsil Sararogha	Sararogha	Tehsil wise merit Miss Asma Bibi PST Transferred to Newly created PST Post at GGPS, Kachra Faridai Tehsil Sararogha vide this office No. 3489-96 dated 06.07.2020
05	Miss Nasrin Gul D/O Gul Karam, PST, GFCS, Malik Muhammad Alam kot	GGPS Noshaba Kot Spin Tehsil Wana	Makin	Tehsil wise merit, the post is vacated due to the natural death of Mst Noshaba PST GGPS Noshaba Kot Spin Tehsil Wana on 09.07.2020 and no tehsil candidates available.
06	Nasreen Akhter D/O Haji Adil Jan, PST, GFCS, Shehzada Hamayun Kot	GGPS Ajab Khan Kot Tehsil Shakai	Makin	Tehsil wise merit Miss Zaib u Nisa PST Transferred to Newly created PST Post at GGPS, Sharif Khan Kot Tehsil Birnal vide this office No. 3489-96 dated 06.07.2020 and no tehsil candidates available
07	Miss Shaheen Begum D/O Syed Mumtaz Ali Shah, PST, GFCS Shogai Galishai	GGPS Shehzada Hamayun Kot Tehsil Ladha	Ladha	Tehsil wise merit & Newly created PST Post at GGPS, Shehzada Hamayun Kot Tehsil Ladha
04	Miss Saqiqa Bib D/O Mozam Khan, PST, GFCS Hasham kot	GGPS Jalal Khan Kot Tehsil Serwakai	Serwakai	Tehsil wise merit & Newly created PST Post at GGPS, Jalal Khan Kot Tehsil Serwakai

TERMS AND CONDITIONS:-

- The appointments of the candidates are being made purely on temporary basis & are liable to termination at any time without assigning any reason.
- Charge report should be submitted to all concerned in duplicate.
- All kinds of documents which are not verified should be verified from the concerned institutions.
- If they failed to report of their arrival to their place of duty within 15 days, their appointment order will be considered automatically as cancelled.
- In case the documents / Certificates of candidate proved bogus, his / her appointment will be cancelled and the next deserved candidate will be appointed. The pay (if drawn) will be recovered from the candidate and will be deposited in the government Treasury.
- In case of resign, he/ she will be submit the application one month before the date of resignation other wise he/she will deposit the pay of one month in the government Treasury.
- Before taking over charge each candidate will provide a certificate on the stamp paper that he/she has no any other service in the government / Semi Government Institution/department.
- They will not claim seniority of the period served as community school teacher.

DISTRICT EDUCATION OFFICER
S.W DISTRICT AT TANK.

Encl. No. 296-309 Dated Tank the 13/07/2020

- Copy of the above is forwarded to the:-
- Director, Elementary & Secondary Education, FATA
 - Director of Education, NWFC, Islamabad
 - Deputy Commissioner, District South Waziristan, FATA
 - District Accounts Officer, District South Waziristan, FATA
 - ADSP, FATA
 - Government office concerned.
 - Candidate concerned.

DISTRICT EDUCATION OFFICER
S.W DISTRICT AT TANK.

BETTER COPY
OFFICE OF THE DISTRICT EDUCATION OFFICER,
DISTRICT SOUTH WAZIRISTAN AT TANK.

RE-APPOINTMENT ORDER:-

In light of the Notification No.SQ(E)/SSD/CSTR/99-10B. dated 11/05/2012 issued by FATA Secretariat. Social sectors department and director of education, FATA Memo No.8964-76 Dated the 28th June,2012, the following female PTC teachers serving in community schools are hereby re-appointed as regular PST in BPS-12 plus usual allowances as admissible under the rules purely on temporary basis with effect from 01/07/2020. The appointments have been made on tehsil-wise merit policy against the vacant PST posts in Regular School in the interest of the public service:-

SR. NO.	NAME WITH FATHER'S NAME	NAME OF SCHOOL where appointed	Tehsil	Remarks
1	Miss Zunaira Khan D/o Mujhammad Naseem Khan PST, GFCS GulMunirKot	GGPS Lal Muhammad Kottesil WANA	WANA	Tehsil wise merit, newly created PST post at GGPS Lal Muhammad Kottesil WANA
2	Miss Azmeena Bibi D/o Mumtaz Khan, PST GFCS Rashid KotMakeen	GGPS Shawa badiwai Tehsil Sararogha	Sararogha	Tehsil wise merit, miss rubina azam PST transferred to newly created PST post at GGPS Hatta Khan Kot tehsil Sararogha vide this office No.3489-96 dated 06/07/2020
3	Miss Famida Rahim D/o Dr. Said Rahim PST GFCS Hatta Khan Kot	GGPS Shankia Tehsil Sararogha	Sararogha	Tehsil wise merit miss tahera shoukat PST transferred to newly created post at GGPS Khalil Kai khelkot tehsil sararogha vide this office No. 3489-96 dated 06/07/2020
4	Miss Samina Hamidai d/o Abdul Hamid PST GFCS Hazrat Ali Kot	GGPS Safdar Kot Tehsil Sararogha	Sararogha	Tehsil wise merit Miss Asma Bibi PST Transferred to newly created PST post at GGPS Kachra Faridai tehsil sararogha vide this of No.3489-96 dated 06/07/2020
5	Miss Nasrin Gul D/o GulKaram PST GFCS Malik Muhammad AlamKot	GGPS Nazar Jan Kot Spin Tehsil WANA	Makin	Tehsil wise merit the post is vacated due to the natural death of MstNoshaba PST GGPS Maza jan kot spin tehsil WANA on 09/07/2020 and no candidates available
6	Miss Nasreen Akhtar D/o Haji Adil Jan PST GFCS HumayunKot	GGPS Ajab Khan Kot Tehsil Shakai	Makin	Tehsil wise merit Miss Zebun Nisa PST transferred to newly created PST post at GGPS Sharif Khan Kot tehsil Bermal vide this office No 06/07/2020 and no candidates available
7	Miss Shaheen Begum D/o Syed Mumtaz Ali Shah PST GFCS ShogaiGalishai	GGPS Shahzada Humayun Kot Tehsil Ladha	Ladha	Tehsil wise merit and newly created PST post at GGPS Shezada Humayun Kot Tehsil Ladha
8	Miss Sadiqa Bibi D/o Muazam Khan PST GFCS HashamKot	GGPS Jalal Khan Kot Tehsil Sarwaikai	Sarwaikai	Tehsil wise merit and newly created PST post at GGPS Jalal Khan Kot Tehsil Sarwaikai

TERMS AND CONDITIONS

1. The appointments of candidates are being made on purely temporary basis and is liable to termination at any time without assigning any reason.
2. Charge report should be submitted to all concerned in duplicate.
3. All Kinds of documents which are not verified should be verified from concerned institution..
4. If they fail to report their arrival for taking over charge within 15 days their appointment order shall be treated as canceled.
5. In case the documents/ certificates of candidate proved bogus, his/her appointment will be canceled and the net deserved candidate will be appointed. The pay (if Drawn) will be recovered from the candidate and will be deposited in the government treasury.
6. In case of resign, he/she will submit the application one month before the date of resignation otherwise he/she will deposit the pay of one month in the government treasury.
7. Before taking over charge each candidate will provide a certificate on the stamp paper that he/she has no any other service in the government/ semi government institution/ department.
8. They will not claim seniority of the period served as community school teacher.

DISTRICT EDUCATION OFFICER
S.W DISTRICT AT TANK

ENDST NO. _____ DATED TANK THE _____/2020

Copy forwarded to

1. The Director Elementary and Secondary Education, Peshawar.
2. The Director Education, NMDs Peshawar.
3. The Deputy Commissioner, District South Waziristan, Tank
4. The District Accounts Officer. District South Waziristan At Tank.
5. ADEO Concerned.
6. Accounting Head Office Concerned
7. The candidate concerned.

DISTRICT EDUCATION OFFICER
S.W DISTRICT AT TANK

Handwritten note "C"

1. Passed SSC examination from
Here

1. B.A. First Arts under R.C.C.
2. No 3145 in Session 1987 obtaining
3. Mark (i) 592/850

Verification Roll No _____ Dated _____ Received back

Left thumb-impresion 

Qualifications	Dated	Qualifications	Dated
English	certified that SSC certificates	First Arts	
Pashto	is verified with Govt NO.	B.L. or B.A.	
Urdu	1767 dated 15-7-5904	Pleader ship examination	
Plan-drawing		Training School final Examination	
Finger Print		Other Qualifications	
Drill Instruction	Passed M.A (Urdu)	Examination from	
Court Duties	Somal University Dikhan under Roll No. 1984		
Reserve duties	Session 2011 (Annual) Marks obtain 399 out of 800 result declared on 15/01/2013		
	Verification letter No. 444/Qu/Exam/cs dt, 12-05-2016. vide 15/01/2013		

Agency Education Officer
S.W.A. (Part)

Handwritten signature and date 29/10

(9)

The entries in this page should be renewed or re-attested at least every five years, and the Signature in lines 9 and 10 should be dated.

1. Name Shah Sheen Begum
2. Race Syed
3. Residence Village Khariguzone Zohi Ladha C.W. Agency
4. Father's name and residence Munir Ali Shah
5. Date of birth by Christian era or as nearly as can be ascertained 01-01-1971 (According to SSC certificate)
6. Exact height by measurement 5-2
7. Personal make for identification wound scar on forehead
8. Left hand thumb and finger impression of (Non Gazetted Officer) _____

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant

Shahen Begum

10. Signature and designation of the Head of the office, or other Attesting officer.

[Signature]
Agency Head Office
Zohi Ladha C.W. Agency

10

1 Name of Post	2 Whether substantive or officiating and whether permanent of temporary	3 If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 1.20 of C.S.R. (Pb.) Volume II	4 Pay in substantive Post		5 Additional pay for officiating		6 Other emoluments falling under the term "pay"	7 Date of appointment
درجہ ملازمت	مدرس - مستقل یا قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پوسٹن کا تسلی ہے	تختخواہ بطور عارضی ملازمت	زائد تختخواہ بطور قائم مقام	بیسوا کے تختخواہ دیگر لائونس	تاریخ تقرری	Sd/- Govt Secy Sd/- Sd/- Sd/-	
	PTC کلاس Shri J. K. Sharma Sd/-		Rs. Ps. Rs: 2220/141			26-5-2006		

B-7 (2555-140-6755 P)

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2005

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2005

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2006

9	10	11	12	13		14	15
	Case of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office or other attesting Officer	Name and duration of leave taken	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitabla to another Government		Reference to any recorded punishment or censure, or reward or praise of the Government servant
				Period	Govt: to which debitabla	Signature of the head of the office or other attesting officer	
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی
افسر مجاز	مقررہ ملازمت	دعوتی ملازمت	افسر مجاز دستخط	رخصتی اوریت و سیار	پارہنگ کی رخصت کے لئے اوسط عوامی کارکنین	دستخط افسر مجاز	۱۷/۱۱/۰۶ یا غیر مناسب کارکردگی کارکردگی

Appointed against P.Te post
at G.G.F.C.S Shogai Galisghai
(S.W. Agency) vide AEO (SNA)
Tank No 7110-14 Dated 28-5-2006

Service report was sent 26-5-06
to 30-11-2006 from the
office copy of the bill
and other office
records.

AEO
S.W.A. Tank

9	10	11	12	13	14		15
					LEAVE		
Name and duration of leave taken	Signature of the Head of the office or other attending Officer	Cause of absence	Signature of the Head of the office or other attending Officer	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government	Signature of the head of the office or other attending officer		Reference to any recorded punishment or censure, or reward or praise of the Government servant
					Period	Govt. to which debitible	
پارہنگہ کی رخصت کے لئے ادنیٰ کوٹوالا تھیں		انہماک			دستخط افسر مجاز		12/1/12 کارکن کارکن
		انہماک		① Passed P.T.C Examination Delambad under R.No. N602267 Session 2003 marks obtained 553/900 result declared on 21-02-2005 verified vide letter No. FI-5/Per/5794 dated 25-07-2012.	✓		from AIDP, N602267 ✓
		انہماک		② Passed BA Exam, from Gomal university Dikhan under R.No. 9195 Session 2008 marks obtained 291/500 result declared on 11-09-2008 verified vide letter No. 2939 dated 05-07-2012.	✓		
		انہماک		③ Passed B.Ed Exam, from Gomal university Dikhan under R.No. 774 Session 2008(A) marks obtained 646/1200 result declared on 16-12-2009 verified vide letter No. 2939 dated 05-07-2012.	✓		
		انہماک		④ Passed FA Exam From BISE Bannu Under Roll No. 32188 Session 2006(A) marks obtained 718/1100 Result declared on 5-8-06 and verification letter no. 423 Sec./BISE/2012 Dated 15-8-012	✓		

Government
Service
دستخط
افسر مجاز

✓

1 Name of Post	2 Whether substantive or advising and whether permanent or temporary	3 If officiating state (i) substantive appointment or (ii) whether service entitled for pension under rule 320 of C & R (Pb.) Volume II	4 Pay in substantive Post		Additional pay for officiating		Other emoluments falling under the term "pay"	Date of appoint. ment
			Rs.	Ps.	Rs.	Ps.		
<p>درج ملازمت</p> <p>BPS No-12C 13320-960-42120</p> <p>(Regular) PST post at 99PS Shah Zada, Hamirpur Kot, Tehsil Ladha (SNFD)</p>	<p>ماریں مستقل قائم مقام</p>	<p>اگر عارضی ہے تو کیا وہ رول کے بمطابق پنشن کا مستحق ہے</p>	<p>مختص بطور عارضی ملازمت</p>	<p>زائد مختص بطور قائم مقام</p>	<p>ماسوائے مختص دیگر الاؤنس</p>	<p>تاریخ تقرری</p> <p>14-7 2020</p>		
			B. pay/Bs = 13320/-					
			ch = pay/Bs = 14280/2					12 1- 2021

P. No. 961030

14

			13		14	15	
9	10	11	12	LEAVE		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
				Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government	Period		
Date of termination of appointment	Reason of termination (such as promotion transfer etc)	Signature of the Head of the office or other attesting Officer	Name and duration of leave taken	Govt: to which debitible			
17/11/2020	روايات افغان ملازمت زنی - تبادلہ یا برطرفی	دستخط افسر مجاز	رضت کی رویت دھیاد	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	6 مہ	دستخط افسر مجاز	سزا یا فیر متاسب کارکردگی کار کیا
30 th April 2021 Allowed				RE-APPOINTMENT ORDER			
TCA-74 21/12/2020				<p>15/07/2020</p> <p>296-309 Date 15/07/2020</p>			
BANK PASS = 102572/A on a/c A PAY + ALLOTT: 30-11-2020				<p>14/7/2020</p> <p>30-11-2021</p> <p>R/PAY scale.</p>			

TECHNOLOGICAL

9	10	11	12	Name and duration of leave taken	13 LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitabale to another Government		14	15
Signature and designation of the Head of the office or other authority	Date of termination or appointment	Reason of termination (such as promotion transfer (dumseal etc))	Signature of the Head of the office or other attesting Officer		Period	Govt: to which debitabale	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
افسر مجاز	تاریخ اطلاع ملازمت	رجوہات اطلاع ملازمت ترقی - تبادلہ یا برطرفی	دستخط افسر مجاز	رضعت کی نوعیت و معیار	عرصہ	گورنمنٹ ڈپارٹمنٹ	دستخط افسر مجاز	سزایا جزا یا غیر مناسب کارکردگی کاریکارڈ
	30/11/2022		Approved					

From 01/12/2021 TO 30-11-2022 From Punjab Govt. Punjab Police

17

To

1. Secretary Education Khyber Pakhtunkhwa Peshawar.
2. Director General Education Khyber Pakhtunkhwa Peshawar.
3. Director Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer (F) South Waziristan Tribal District.
5. District Account Officer South Waziristan Tribal District.

NOTICE

Subject; **SERVICE APPEAL TITLED "SHAHEEN BEGUM
SECRETARY EDUCATION ETC."**

Please take the notice that the undersigned is going to file the above titled Service Appeal before the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar.

You are also impleaded as respondent in the above titled Service appeal. (Copy of the complete file i.e. the appeal along with its annexures is enclosed herewith)

Dated: 28-01-2023

Through Counsel

Shah
M. Amjad Ali
Ali adu
Pir Amjad Ali Shah
Advocate High Court
DBA.Dera Ismail Khan

18

AMJ ALI SHAH

Advocate
bc-11-2790

Date of issue: December 2022

Valid upto: December 2025



کورٹ
فیس

Rs:50/-

Secretary
KF Bar Council

صدر محنتوں کوہ سردسری (ریٹسویل) سٹور
 منجانب سٹائبل بیگم (ایڈوائزر)
 بنام سکرٹری ایجوکیشن و کونسل
 ڈوی یا جرم
 تفصیل ڈوی یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بروہی و جواب دی برائے پیشی یا تفسیر مقدمہ نام
 سر احمد علی شاہ ایڈووکیٹ سٹور
 یہ حسب ذیل شرط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ بروہی عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
 موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
 پروہی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات آگے یا پیچھے پیش ہونے
 پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا ایسے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے بجز
 کوئی ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض ڈوی یا جواب ڈوی یا درخواست اجراء اسمائے ڈگری
 نظر ثانی اپیل تگرامی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ٹاپٹی یا راضی نامہ و فیصلہ برطرف کرنے اقبال ڈوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے
 تاریخ پیشی مقدمہ مزکور بیرون از پکھری صدر پروہی مقدمہ مزکور نظر ثانی اپیل و تگرامی و برآمدگی مقدمہ یا منسوخی ڈگری یک طرفہ یا درخواست حکم استثنائی یا قرتی
 یا گرفتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ محتاط پروہی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ
 از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی
 اپیل تگرامی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا ہیر سز کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دی اور دیے
 اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر
 صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروہی نہ کریں اور ایسی صورت
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

مورخہ 28-1-2023ء سنوری

مضمون وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted
11/1/23
Suhail
Adv.

سٹائبل بیگم
ایڈوائزر
Signature

12201-2654845-0