## EFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

فيتناسر بالمتحد بسعاقة

### Service Appeal No. 1014/2019

Date of Institution ... Date of Decision ... 02.08.2019 20.01.2021

Mst. Ishrat W/O Sher Afghan Khan Ex-SST (Gen), R/O Village Fazal Abad, Tehsil Takht Bhai, District Mardan.

(Appellant)

(Respondents)

#### **VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary Secondary Education, Civil Secretariat Peshawar and two others.

Present:

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20/1/21

Amin ur Rehman Yousafzai, ... For appellant.

Kabir Ullah Khattak, Additional Advocate General .... For official respondents.

ROZINA REHMAN ATIQ UR REHMAN WAZIR . MEMBER (J) . MEMBER (E)

#### <u>JUDGMENT</u>

<u>ROZINA REHMAN, MEMBER</u>: This judgment is intended to dispose of 40 connected service appeals which are:

- 1. Service Appeal No.958/2019
- 2. Service Appeal No. 959/2019
- 3. Service Appeal No.960/2019
- 4. Service Appeal No.961/2019

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5.	Service Appeal No.962/2019
6.	Service Appeal No.963/2019
7.	Service Appeal No.964/2019
8.	Service Appeal No.965/2019
9.	Service Appeal No.966/2019
10.	Service Appeal No.967/2019
11.	Service Appeal No.968/2019
. 12.	Service Appeal No.969/2019
13.	Service Appeal No.970/2019
14.	Service Appeal No.971/2019
15.	Service Appeal No.972/2019
16.	Service Appeal No.973/2019
17.	Service Appeal No.974/2019
18.	Service Appeal No.975/2019
19.	Service Appeal No.1009/2019
20.	Service Appeal No.1010/2019
21.	Service Appeal No.1011/2019
22.	Service Appeal No.1012/2019
23.	Service Appeal No.1013/2019
24.	Service Appeal No.1014/2019
25.	Service Appeal No.1015/2019
26.	Service Appeal No.1016/2019
27.	Service Appeal No.1017/2019
28.	Service Appeal No.1018/2019
29.	Service Appeal No.1024/2019
30.	Service Appeal No.1025/2019
31.	Service Appeal No.1026/2019

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20/1/21

Service Appeal No. 1027/2019 32. 33. Service Appeal No. 1028/2019 34. Service Appeal No.1029/2019 35. Service Appeal No.1030/2019 36. Service Appeal No.1031/2019 37. Service Appeal No.1032/2019 38. Service Appeal No.1033/2019 39. Service Appeal No.1041/2019

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40. Service Appeal No.1111/20219

In view of common questions of law and facts, the above captioned appeals are being disposed of by this order.

2. Precisely stated the facts of the case are that the appellants were appointed as SSTs. They were directed to produce service record but failed. After completion of codal formalities, they were removed from service by means of orders dated 04.04.2019 and 05.04.2019. They preferred departmental appeals but the same were not responded to, hence, the present service appeals.

3. Learned counsel for appellants submitted that the appointments were made in accordance with law by following the prescribed procedure which cannot be held fake appointments. That notifications dated 04.04.2019 and 05.04.2019 are against law and facts. That the appellants were not treated in accordance with law and they were not given an opportunity to defend themselves as enshrined in Article 10-A of the Constitution of Islamic Republic of Pakistan 1973. Learned counsel further argued that neither regular inquiry was conducted nor the appellants were served with show cause notices, hence, they all were condemned unheard. That all the appellants being qualified, were properly appointed after due process of law

and fulfillment of all codal formalities but they were shown out of service with a single stroke of pen without care and caution of its legal consequences which caused grave miscarriage of justice. In order to substantiate his version, reliance has been placed on 2011 SCMR 1581; 2004 SCMR 303; 2016 SCMR 1299 and 2010 PLD SC 483.

4. Conversely learned A.A.G appearing on behalf of respondents, controverted the contentions of learned counsel for appellants by contending that claim of the appellants regarding their appointment is baseless and liable to be rejected as they never applied for the said post nor appeared in any interview, therefore, their appointment was declared fake & bogus and have been disowned by the Department vide notifications dated 04.04.2019 and 05.04.2019. He submitted that they were treated as per law, rules and policy and there is no question of violation of Article 10-A of the Constitution of Islamic Republic of Pakistan 1973, hence stance of the appellants is baseless and liable to be rejected and lastly, he submitted that those appellants who claimed to have been recommended by the Khyber Pakhtunkhwa Public Service Commission, failed to produce any proof of their recommendation by Public Service Commission. Reliance was placed on 2005 SCMR 1814; 2005 SCMR 1040; 2009 SCMR 1492 and 2012 SCMR 673.

5. Before dilating upon the main issue, it merits a mention here that total 40 connected cases are intended to be disposed of through this single judgment. There are three categories of cases, category-I includes fives cases of those employees who were appointed on contract basis and subsequently were regularized in service under the KP Employees (Regularization of Service) Act, 2009 and it was on 04.04.2019 when they received notification vide which appointment record in respect of these appellants was found bogus, thus, their appointment/adjustment notification dated 11.02.2010 was disowned. Category-II includes those employees who upon recommendation of D.S.C, were appointed as PTC, subsequently applied for SSTs' posts and were selected by the Khyber Pakhtunkhwa Public Service Commission. It was on 04.04.2019 when they received notification vide which appointment record in respect of these appellants was found bogus, thus, their appointment notification was disowned. Appellants of category-III are those, who appointed as SSTs were on the recommendations of KPPSC and two of them were promoted to the rank of S.S and it was on 04.04.2019 when they received notification vide which appointment record in respect of these appellants was found bogus, thus, their appointment/adjustment notification was disowned.

6. Secondary School Teachers (SST) previously known as S.E.T are usually appointed through Departmental Promotion Committee or through Public Service Commission. As per existing policy, the promotion share is 75% of various Teaching Cadre and 25% is through initial recruitment. Recruitment of SSTs were lastly made through Public Service Commission in 2012 while in the year 2008, SSTs were recruited on Adhoc/Contract Basis and later on, they were regularized. As per respondents there were rumors that various number of SSTs, SETs have been inducted in the system and working in different agencies without adopting the proper recommendation of Public Service Commission or Departmental Promotion Committee. This task was assigned to two Assistant Directors who checked the credentials of all the SSTs and submitted report where-after another Inquiry Committee was constituted and 69 SSTs were declared fake being directly inducted in the system. The Inquiry report was not available on record and it was produced upon the directions of Bench. There is a riddle as to how the

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respondents came to know without any inquiry after a long period of service by all the appellants that their appointment order is fake. Different documents were produced by the appellants which were placed on file which show that some of the appellants applied for a post published by the Public Service Commission as they produced application forms. Appellant in Service Appeal No.964/2019 Shakir Ullah produced his application form, one Abdul Malik appellant in Service Appeal No.968/2019 also produced Call Letter for Interview from Public Service Commission. Similarly, appellant in Service Appeal No.1010/2019 also produced his Call Letter. Some documents were produced by appellant in Service Appeal No.965/2019 vide which he was directed by the Commission to rectify the deficiencies. Another letter addressed to the Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education vide which recommendations in favor of 21 recommendees was sent and few recommendees are still in service. Another recommendation in favor of three ladies is available on file wherein appellants Mst. Sarwat Jehan and Mst. Tahira Naz are available at Serial No. 1 & 3 whereas Mst. Rabia Shams at Serial No.2 is still in service. Similarly, other documents also show same entries. Record further shows that appellants in Service Appeals No.1027/2019 and 1033/2019 i.e. Mst. Sarwat Jehan and Mst. Seema Mujahid respectively were properly promoted as there was nothing against them. They are qualified and they served the Department for a long period. They drew their salaries and lastly, they were removed by the authority by disowning their service record. As per recommendations of the Inquiry report, 69 SSTs were neither recommended by the Public Service Commission nor promoted/recruited by the Elementary Secondary Education Khyber Pakhtunkhwa. & Their salaries were proceedings recommended be stopped

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Pakhtunkhwa Government<sup>1</sup> Servants (Efficiency & Discipline) Rules, 2011 were recommended to be initiated. The competent authority while passing the impugned order did not bother to go through the contents of the inquiry report. The appellants have received salaries for a long period which strengthen their case. The respondents did not irk to conduct proper inquiry as to who issued such orders and who processed and submitted their salaries to the Account Office. The respondents avoided all such mandatory steps and out rightly stopped their salaries by disowning their appointment orders, thus allow the real culprits to stay behind the curtain, knowing the fact that the appellants have now developed a vested right over the posts as they have drawn salaries for a long period against the sanctioned posts. The respondents handled the case carelessly by not reaching to a logical conclusion, hence, left the appellants in a hanging position.

7. In view of the situation, the impugned orders stand set aside and the appellants are reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellants be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

ANNOUNCED. 20.01.2021

(Atig ur Rehman, Wazir) Member (E)

Rozina **R**ehman) Member (J)

## Form-A

## FORM OF ORDER SHEET

Court of Counsel for the appellant present. 06.09.2019

	Case No	1014/ <b>2019</b> Contends that through notification dated 04.04.2019 the
S.No.	Date of order proceedings	Order or other proceedings with signature of judge ident No. 2/Director Elementary & Secondary Education,
1	۷. ۲	r Pakhtunkhwa Peshawar "disowned" the appointment/
	adjust	ment notification of the appellant ostensibly on the ground
1-	02/08/20指at a	t the time appaired Mappoint near appeliant in a provided an
	fake/b	ogusatiologyerits. Takherheterphinthenentiwider Registerwast nut up
	genuir	to the Worthy Chairman for proper order please, with the service of
		ant the respondents did not respondents did not respondents
	depart	mental proceedings and the appellant was not provided with
2.	any o	This case is entrusted to S. Bench for preliminary hearing to be portunity of putting forth his defence. The respondents did put up there on a second
	not c	are to issue any show cause notice nor a proper/regular
	enquir	y was conducted before issuing of impugned notification.

In view of available record and argufileAtBMotNlearned counsel, instant appeal is admitted for regular hearing subject to:all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11 2019 before S.B.

Chairman

06.09.2019

Counsel for the appellant present.

Contends that through notification dated 04.04.2019 the respondent No. 2/Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar "disowned" the appointment/ adjustment notification of the appellant ostensibly on the ground that at the time of initial appointment the appellant had provided fake/bogus documents. Even the appointment order itself was not genuine. It was argued that while dispensing with the service of appellant the respondents did not resort to mandatory departmental proceedings and the appellant was not provided with any opportunity of putting forth his defence. The respondents did not care to issue any show cause notice nor a proper/regular enquiry was conducted before issuing of impugned notification.

In view of available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11.2019 before S.B.

Chairman

#### 18.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Hamid Saleem Law Officer for the respondents present.

Representative of the respondents seeks time to furnish written reply/comments. Adjourned to 19.12.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman

19.12.2019

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

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Representative of respondents seeks further time to furnish reply/comments. Adjourned to 08.01.2020 on which date the requisite reply/comments shall positively be submitted.

## 08.01.2020

Junior to courisel for the appellant and Addl. AG alongwith Irfan@lah, Assistant for respondents No. 1 & 2 present. Nemo, or respondent No. 3.

Representative of respondents No. 1 & 2 seeks time. Fresh notice be issued to respondent No. 3. To come up for written reply/comments on 24.01.2020 before S.B.

Chairman

Chairman

24.01.2020

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Juator to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of the respondents seeks short adjournment for submission of reply/comments. Adjourned to 10.0?.2020 on which date the requisite reply/comments shall positively be furnished.

Chairmah

10.02.2020

Learned counsel for the appellant present. Written reply not submitted. M/S Irfan Ali Assistant (for respondents No.1 & 2) and Mehtab Gul Law Officer (for respondent No.3) present. Representatives of respondents requested for short adjournment to furnish reply. Granted. To comé up for written reply/comments on 24.02.2020 before S.B.

Member

24.02.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hayat Khan, AD and Mehtab Gul, Law Officer for the respondents present. Respondents still seek time to submit reply/comments. Last chance is granted. To come up for written reply/comments on 12.03.2020.

12.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith M/S Hayat, Assistant Director on behalf of respondents No. 1 & 2 and Iftikhar Bangash on behalf of respondent No. 3 present. Written reply on behalf of respondents not submitted despite last chance. Both the representatives of the department seek further time to furnish written reply/comments. Last chance is extended to 31.03.2020 for written reply/comments before S.B.

> (MUHAMMAD AMIN KHAN KUNDI) MEMBER

(Hussain Shah) Member 21.08.2020

Due to COVID-19 the case is adjourned for the same on 15.10.2020 before D.B. 

#### READER

15.10.2020

Mr. Khalid Khan Mohmand, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Hazrat Shah, Section Officer, are also present.

Learned counsel submitted that his senior has proceeded to Dar-ul-Qaza Mingora bench of the Hon'ble Peshawar High Court, Peshawar, and cannot attend the Tribunal today. Requested for adjournment. Adjourned to 17.11.2020 on which to come up for arguments before D.B.

(Atiq-ur-Rehman Wazir)

Member (Executive)

(Muhammad Jamal Khan) Member (Judicial)

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Saleem Law Officer for respondents present.

Arguments heard. During arguments, it came to light that an inquiry was initiated which is evident from the impugned notification/order, therefore, respondents are directed to make sure the availability of complete inquiry file on or before the date.

Adjourned to 09.12.2020 for doing the needful and order, before D.B.

tiq ur Rehman Wazir) Member (E)

(Rozina Rehman) Member (J)

09.12.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Salim Law Officer, Fahim Ullah Law Officer and Murtaza Superintendent for respondents present.

Inquiry reported was submitted by representative of respondents copy whereof was handed over to learned counsel for appellant. A request was made for adjournment by learned counsel for appellant in order to go through the contents of the inquiry report and properly assist thie Tribunal on the next date of hearing.

Adjourned to 12.01.2021 for arguments in the light of inquiry report.

(Atig ur Řehman Wazir)

Member (E)

(Rozina Rehman) Member (J)

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31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.

23.06.2020

Counsel for the appellant present.

Fr.2C .... DELLAS

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith representatives M/S Irfan Ullah Assistant and Mohsin Hassan Khan for the respondents present.

Representatives of the respondents submitted written reply which is placed on record. To come up for rejoinder, if any, and arguments on 21.08.2020 before D.B.

Member

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12.01.2021

## Appellant with counsel present.

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Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer for respondents present.

Today, an application for placing on file certain documents was submitted by appellant and accordingly all the documents are placed on file. Copy whereof was handed over to the learned A.A.G. A request was made for adjournment by learned A.A.G. Last chance is given. To come up for arguments on 20.01.2021 before this D.B.

(tiq ur Rehman Wazir) Member (E)

(Rozina Rehman) Member (J) 20.01.2021

Appellant alongwith counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.

Vide detailed judgment of today of this Tribunal placed on file, the impugned orders stand set aside and the appellants are reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellants be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

Announced. 20.01.2021

Rehman Wazir) Member (E)

(Rozina Rehman) nember (J)

#### Set 1 Stand

## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal Nd. 014/2019

## ....VERSUS....

S.No.	Description of documents	Annex	Pages
1.	Service Appeal	•	1-4
2.	Application for Grant of Status Quo alongwith Affidavit		5-6
3.	Addresses of the parties		7
4.	CNIC	<u>"A"</u>	8
· 5.	CV ···	"B"	9
6.	Educational Testimonials	"C"	10-13
7.	Advertisement dated: 26.01.2009	"D"	14-18
8.	Appointment Notification dated: 25.06.2012	"E"	19-20
9.	Adjustment order dated: 28.06.2012 alongwith charge report dated: 01.07.2012	"F"	21-22
10.	Impugned Notification dated: 05.04.2019	"G"	23
11.	Departmental Appeal dated: 19.04.2019 alongwith diary/dispatch number	"Н"	24-25
12.	Wakalatnama		26

## INDEX

Appellant Through

Sajjad N

Amin vr Rehman Yusufzai

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Khalid Khan Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

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#### BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL. PESHAWAR 1014

Service Appeal No.

20ber Pakhtukh

Diary No.

Appella

Mst. Ishrat W/O Sher Afghan Khan, Ex-SST (Gen), R/o Village Fazal Abad, Tehsil Takht Bhai, District Mardan.

#### ....VERSUS....

- 1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
- Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil 2. Secretariat, Peshawar.
- 3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort

#### SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING **PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:**

NOTIFICATION **ENDORSEMENT** NO.5867-71, DATED: 05.04.2019 RESPONDENT NO.2. VIDE WHICH OF NOTIFICATION DATED: 25.06.2012 APPOINTMENT ALONGWITH ADJUSTMENT ORDER DATED: 28.06.2012, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

#### **PRAYER-IN-APPEAL:**



On Acceptance of Instant Appeal, the Impugned Notification dated 05.04.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, Hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

#### **Respectfully Sheweth;**

- That appellant is law abiding peaceful citizen of Pakistan and 1. permanent resident of District Mardan. (Copy of CNIC, is attached as Annexure "A")
- 2. That appellant obtained Master degree, in the year 2015, from Allama labal Open University, Islamabad and having passed PTC, C.T & B.Ed Dearee courses from Alkhair University. (Copies of CV and Educational Testimonials, are attached as Annexure "B" &"C", respectively)
- 3. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16), vide Advertisement No.01/2009, dated: 26.01.2009.

(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "D")

That appellant, being qualified, applied for one of the aforementioned advertised posts of SSTs (BPS-16) and gone through the entire process of selection successfully, eventually she, on the recommendation of KP PSC, was appointed as SST (Gen) BPS-16, on regular basis, vide Notification Endorsement No.2816-23/File No.2/A-14/SST(F)Gen/PSC/Apptt: dated: 25.06.2012.

(Copy of appointment Notification dated: 25.06.2012, is attached as Annexure "E")

5. That appellant was subsequently adjusted in Govt Girls Middle School, Kackol Kelli, Tribal District Mohmand i.e. against vacant Post, vide Order dated: 28.06.2012

(Copy of Adjustment order dated: 28.06.2012 alongwith charge report dated: 01.07.2012, is attached as Annexure "F")

6. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however she has unilaterally been shuntout from service, vide impugned Notification dated: 05.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.

(Copies of Impugned Notification dated: 05.04.2019, is attached as Annexure "G")

 That appellant preferred departmental appeal dated: 19.04.2019 to respondent No.1 which was received vide Diary No. 1257 dated: 19.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.

(Copies of Departmental Appeal dated: 19.04.2019 alongwith diary/dispatch number, is attached as Annexure "H")

8. That appellant, being aggrieved of impugned notification dated: 05.04.2019 and not considering her departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

#### <u>GROUNDS:</u>

4.

- A. That impugned Notification dated: 05.04.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor she has been provided equal protection of law, rather she has not been provided fair opportunity to defend himself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
- C. That neither regular enquiry was conducted into the guilt of the appellant nor she has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterm-partem.

That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.

That appellant has served the department with zeal, devotion and to the best of her abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

#### I. <u>2011 SCMR 1581</u>

"Appointment order found to be bogus/fake/irregular .... Validity ..... Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possessing of requisite qualification by him or his appointment to be made by an incompetent officer .... Department had not found performance of employee to be unsatisfactory .... Impugned order was set aside in circumstances"

#### II. 2004 SCMR 303

"Appointment of Civil Servants were made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities."

#### III. 2016 SCMR 1299

"The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program."

#### IV. 2010 PLD SC 483

"Principle of Audi-alterm-Partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him"

That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

D.

E.

F.

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 05.04.2019 of respondent No.2 alongwith Pre and Post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-abinitio and of no legal effect, hence be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case may also be granted.

> Appellant Through Amin ur Rehman Yusufzai

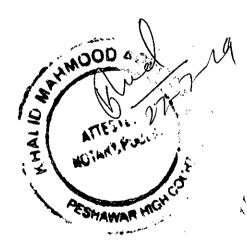
Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

#### **VERIFICATION:**

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.





## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

C.M No.\_\_\_/2019 In Service Appeal No.\_\_\_/2019

Mst. Ishrat

#### ....VERSUS....

## APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE TITLED SERVICE APPEAL

## Respectfully Sheweths.

- 1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
- 2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
- 3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
- That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.
- 5. That there is no legal bar to grant the subject relief, rather grant of status quo will prevent miscarriage of justice to be occasioned.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.

> Appellant Through

> > Amin ur Rehman Yusufzai

Sajjad Mehsud

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Khalid Khan Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

C.M No.\_\_\_\_/2019

Service Appeal No.\_\_\_/2019

...Appellant

Mst. Ishrat . . . . .

#### ....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others ..... Respondents

## <u>AFFIDAVIT</u>

I, Mst. Ishrat W/O Sher Afghan Khan, Ex-SST (Gen), R/o Village Fazal Abad, Tehsil Takht Bhai, District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Petition'** are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

DEPONENT CNIC #: 16/0/~9/45957-0

Amin-ur-Rehman Yusufzdi Advocate, Peshawar

WAHMOOD ATTESIED NOTARY PUBLA AWAR HIG

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## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.\_\_\_/2019

Mst. Ishrat....

. . Appellant

#### ....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others ..... Respondents

## ADDRESSES OF THE PARTIES

#### <u>APPELLANT:</u>

Mst. Ishrat W/O Sher Afghan Khan, Ex-SST (Gen), R/o Village Fazal Abad, Tehsil Takht Bhai, District Mardan.

#### <u>RESPONDENTS:</u>

- 1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
- 2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt

Appellant Through

Amin ur Rehman Yusufzd

Sajjad Meh

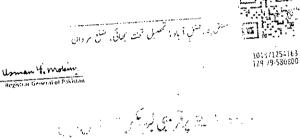
&

Khalid Khan Advocates, Peshawar, 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar Cell No.0321-9022964, 0333-9981464

Dated: 29.07.2019

PAKISTAN National Identity Card Name Ishrat . . . . Husband Name Sher Afghan Khan من خان : من خان : Gender Country of Stay F Pakistan Identity Number Oate of Birth 16101-2145957-0 04.06.1979 Date of Expiry 06.03.2028 Date of Issue 06.03.2018 spipiture Holder

م ۱۵۱۵۱-۷۱۹۵۰ - ۲۰۰۰ می آباد. مسیل محت بحالی سنع مروان ۱۹۱۲ کی [۱۹]



ATTESTED

ANNEX AS

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ANNEX B

# <u>Ishrat</u>

Village & P/O Fazal Abad Tehsil Takht Bhai District Mardan Telephone Number: 00-92 (0) 300-5917754 Mobile Number: 00-92(0)306-9369754 Email Address: <u>teemangle@yahoo.com</u>

## First Apppointment:

<u>28<sup>th</sup> Junc, 2012</u>

## Date of Taking Charge:

1<sup>st</sup> July, 2012 in GGMS Kachkol khwaizi District mohammand

Personnel Number: 50155530

CNIC Number: 16101-2145957-0

Date of Birth : 4/6/1979

## Academic Qualification:

Sr	Deegree	Session	Marks Obtain	Total Marks
1	MSc Pak Study	2015	1097	2000
2	ВА	2001	282	550
3	FA	1998	543	1100
4	Matric	1996	483	850

## **Professional Qualification:**

Sr	Course	Session	Marks Obtain	Total Marks
1	B.cd	2006	733	1100
2	CT	2002	464	900
3	PTC	2008	600	900

## **Other Experiance:**

Sr	Organization	Job Title	Year	Project
1	NCHD	Markaz	2007	Education
		Coordinator		
2	SDC	SO	2008	ERA
3	PRCS	SO	2009	HNH
4	Save the Childern	Education Officer	2010	Education





# University of Peshawar Pakistan

This certifies that

Ishrat daughter of Bahadar Sher

having fulfilled all the requirements is hereby admitted to the degree of

# Bachelor of Arts

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 25th day of September, 2001.

Roll No: 83993 Session: Annual 2001 Reg. No: 2000-PC-11053





Registra

Vice Chancellor

		AND SEC		
RO O		N.W.F.P. Paki	stan	
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' THIS I	S TO CERTIFY THAT _	gshrat		
Son/Daughter and a Candida Registered No		<u>13 ah aclor</u> <u>1 a r clay</u> 1 the INTERMEDIAT	<u>علوم</u> مرزم E EXAMINATION	of the
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Son/Daughter of		Bahadur Sher Khan	
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has passed the S	econdary School Ce	rtificate Examinatio	n
of the Board of Int	termediate and Seconda	ary Education, Peshaw	ar held in April 1996
as a' Regular cano	didate. He/She obtained	d 483 Marks	out of 850
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1. English 2. Urdu	<ol> <li>Islamiyat</li> <li>Pakistan Studies 6</li> </ol>	5. Gen: Science 6. Gen: Mathematics	7_Isl:Studies 8: Pashto
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Asstt Secretary	- This certificate is issued	d without alteration or erasure.	ACTING
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ISHRAT

MARDAN

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Allama Iqbal Open University Web-Based Result Intimation Card

District:

#### Degree Level : MSC(PAK.STY)

Name: Father Name:

Address:

Tehsil:

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Roll Reg

MARDAN

BAHADAR SHER D/O BAHADAR SHER VILL AND P/O KATA КНАТ

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Autumn: 2	2009		· · · · · · · · · · · · · · · · · · ·		
0538	150	49	57	С	PASS
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4656	137	41	49	D	PASS
4657	167	. 31			~ R/ E
4658	161	45	56	С	PASS
Spring: 20	010				- 
0537	162	26			R/ E
4655	115	40	45	D	PASS
4657	167	. 49	59	C	PASS
4659	150	45	54	C	PASS
4660	152	44	54	С	PASS
4661	161	35	• • •	-	R/E
4662	162	49	59	С	PASS
'Autumn:	2010				-
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0541	160	43	. 54	С	PASS
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4665	154	47	56 .	, C	PASS
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4667	145	40	50	С	PASS
4668	161	49	58	С	PASS
4669	- 158	31	•	·	R/E
4670	163	46	57	С	PASS
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\* AREAP=Again Re-appear, \* REAP=Re-appear, \* ABST=Absent Printed on : Friday, August 17, 2018 8:35:52 PM

is electronic version of result card. Erorrs and ommissions excepted. õter≞Thi

Controller of Examination

Annexure:
NWFP PUBLIC SERVICE COMMISSION $(14)$
<u>2- Fort Road</u> Peshawar Cantt.
Website: www.nwfppsc.gov.pk
Dated: <u>26-01-2009</u>
Advertisement No. $01 / 2009$ .
Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.
AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:
Deptt:
"4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to
AGE LIMIT: 21 to 33 years. <u>PAY SCALE:</u> BPS-17. <u>ELIGIBILITY:</u> Both Sexes. <u>ALLOCATION:</u> Merit.
(S.No. 02) Two (2) Posts of Research officers Fodder. In Lⅅ Deptt: <u>QUALIFICATION:</u> M.Sc Agriculture or B Sc (Hors) Agriculture (2)
"4" Years Instructions after F Sc) from a more Agriculture (Obtained) after
which the Vacancy occurs
AGE LIMIT: 21 to 33 years. <u>PAY SCALE</u> : BPS-17. <u>ELIGIBILITY</u> : Male. <u>ALLOCATION</u> :
Merit Zone-1 01 01
CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.
(S.No. 03) Five (05) Posts of Data Entry Oneurote
Science from the recognized Institute (ii) Speed of T
ATTES Zone-1 Zone-2 Zone-2
Zone-1         Zone-2         Zone-3         Zone-4         Zone-5           01         01         01         01         01         01
DIRECTORATE OF INDUCTOR
DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & <u>TECHNICAL EDUCATION DEPARTMENT.</u>
QUALIFICATION: (i) Bachelor Description
the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923. AGE LIMIT: 21 to 33 years, PAY SCALE: BBS 17 BY CORD and
ALLOCATION: NOTE: In case of non- availability of candidates possessing the
wp99.20 2018 Abdul malik vs Govt USB 403 pags
The Contraction of the page

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact. For Biology: 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject

have been studied at graduate lèvel. AGE LIMIT: 25 to 40 years: PAY SCA

	- J-40 <u>- 10 - 10 - 10 - 17</u>	FI ICIDIT TOTAL
ALLOCATION:	· · · · · · · · · · · · · · · · · · ·	
	BPS-17	

		Subject	NT ON	
ļ.	5	Islamiyat	No. of Posts	Allocation
·	6	Pak: Study	. 02	Merit Quota
	7	History-Cum-Civies	03	Merit Quota
	8.	Economics	02	Merit Quota
•	<u> </u>	English	. 02	Merit Quota
	10	Statistics	02	Merit Quota
	_11	Maths	02	Merit Quota
	12	Biology	02	Merit Quota
	13	Chemistry	. 02	Merit Quota
	-14	Physics	<u> </u>	Merit Quota
			. 02	Merit Quota

(S.No. 52)

C NL

Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

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••••	420	<u>Zonc-1</u>	Zone-2 Zone-3	Zonc-4	Zone-5
	L	280	281 280	210	210
					<u> </u>

(S.No. 54)

ATTESTED

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION: Merit.

Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Manschra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION: Merit.

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# (S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

<u>QUALIFICATION:</u> For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics – A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. <u>AGE LIMIT:</u> 21 to 40 years. <u>PAY SCALE:</u> BPS-16 <u>ELIGIBILITY:</u> Female.

D.C					
Merit	Zone-1	Zone-2	Zone-3	7. 1	
243	167	1(7)	20110-5	Zone-4	Zone-5
· · · · · · · · · · · · · · · · · · ·	105	102	162	122	172
					122

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

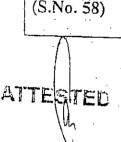
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. <u>AGE LIMIT:</u> 21 to 40 years. years (10 years age relaxation) <u>PAY SCALE:</u> BPS-16 <u>ELIGIBILITY:</u> Female. <u>ALLOCATION: Merit.</u>

Ì	(S.No. 57)	Fifty One (51) Posts of The second
		Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota
		(I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad, (with out graduaty and pension)
		graduaty and pension).
,		Ollar ELOATION -

<u>QUALIFICATION:</u> For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics – A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. <u>AGE LIMIT:</u> 21 to 40 years. <u>PAY SCALE:</u> BPS-16 <u>ELIGIBILITY:</u> Female.

# <u>TECHNICAL EDUATION AND MAN POWER TRAINING</u> <u>DEPARTMENT.</u>



(S.No. 59)

Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

<u>QUALIFICATION:</u> (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer. OR (ii) Master's Degree from a recognized University in the relevant subject with Five

Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College. AGE LIMIT: 25 to 40 years: <u>PAY SCALE</u>: BPS-18. <u>ELIGIBILITY</u>: Male.

ALLOCATION: Merit.

Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institure.

<u>QUALIFICATION:</u> (a) - Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

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(S.No. 66)	Ten (10) Post	s of Male office	Assistant	· · ·	
· · · · · · · · · · · · · · · ·	- UUALIFICATI	ON Bachelor J	1	nized Universit	
			SCALE: BPS-	nized University. 14. <u>ELIGIBILITY</u>	Z. X. 1
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	Zone-1	Zone-2	Zone-3	Zone-4	7
	02	02	. 02	02	Zone-5
· · · · · · · · · · · · · · · · · · ·				02	02 :
(S.No. 67)	One (01) Post	of Female offic	A spintant		·
1	QUALIFICATI	DN: Rechelor de	Cinc - C	ized University.	·
	AGE LIMIT: 18	to 30 years (PA V	SCALE, DDG 1	ized University. 4. <u>ELIGIBILITY</u>	· · · · ·
	ALLOCATION	Merit	SCALE: BPS-1	4. ELIGIBILITY	': Female.
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## <u>CORRIGENDUM</u>

The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.

The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

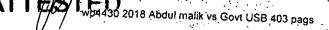
## **GENERAL CONDITIONS**

Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara, and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.

Degrees / Diploma / Experience Certificatës / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.

ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.

The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.



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(v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications.
 Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.

(vi) Applications should be on the prescribed application form obtainable from the listed below branches of the <u>NATIONAL BANK</u>. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will and late applications shall also be ignored.

(vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.

- (viii). Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders:
- - Govt. reserves the right not to fill any or fill-more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
  - (a) Written Test in the Subject.
  - (b) General Knowledge or Psychological General Ability Test:
  - (c) Academic and / or Professional record as the Commission may decide.

# SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

(x)

- Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch. Mingora and city Branch Tank. ATTESTED

# (Atta Ur Rehman)

Secretary NWFP Public Service Commission 2-Fort Road Peshawar Cantt: Ph: 9212962

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Appointment Order No. 11 SST (G) FATA Advt No 1/2009



Directorate of Elementary and Secondary Education Khyber Pakhtunk Fuwa Peshawar PH No. 091-9210389, 9210938, 9210437,9210957. 9210468 Fax 091-9210936 E-mail desekpk@yahoo.com

## Notification.

Consequent upon the recommendation of the Khyber Pukhlunkhwa Bublic Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School. Teacher (SST General) in BPS-16 (Rs:10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his Services placed at the disposal of Director Haucation FATA for further posting-against vacant SST Genral posts:-

<i>Ju</i>	·					
SNO	Name	Father's	Domicile	Zone	Permanent ·	Place of Posting
5.00		Name			Address	Services placed at the
<u> </u>	Naheed	Musafar Khan	Khyber Agency		Hayat Abad Phase- VI, Tehsil & Distt:	disposal of Director of
	Akhtar		Agency		Peshawar.	Education 1414
						yacunt SST General
2:	Basmina	Mir Alam	Mohmand	<u> </u>	Village Shamilat P.O. Shergarh Telisii	
	Begiun	Khan	Agency	· .	Takht Bhai Disit	
<u> </u>	Farzana	Riwaj ud Din .	Mohamand	1	Mardan Moh: Jan Abad	$D_{0}$
			Agency		Tehsil & District Mardan	
• 4.	İshraı	Bahadar Sher	Mohmand Agéncy		Musakhail. Rahmatkot, Tchsil	$\{\psi_{i} D \theta, \psi_{i} \}$
					Upper Mohamaid. Mohmanad Agency	and the second
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Terms and conditions:-

and the month of the day

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Her services will be considered regular but without pension & Granuity in Jerms, of section 19 of the NWFP civil Servant Act, 1973 as amended vide NWFP. Civil, Servants (Amendment) Act, 2005. She will however be entitled to Contributory provident find in such a manner and at such rates as per prescribed by the Covt.

In case, she is already in Government: service and working against pensionable postion regular basis before 1<sup>st</sup> day of July 2001, without any service break on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.

Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.

antra a cale

# Appointment Order No. 11 SST (G) PATA - Advt No 1/2009

- She should join her post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification here. appointment will expire automatically and no subsequent apprial etc shall be entertained. She would be on probation for a period of one year estendable for sublike one
- 'yeàr. She will be governed by such rules and regulations as may be issued from time to time by
- the Govt.

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- HerServices can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned
- The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders. The EDOs concerned will verify their documents before release of pay 10. Her seniority will be maintained as determined by the Khyber Pakhtunkhiwa Public
- <u>11</u>. Service Commission
  - No TA/DA will be allowed to the appointee for joining his duix.

(Muhammad Rafiq Khattak) Director Elementary and Secondary Filucation Khyber Pakhtunkhwa Peshewar

Endst: No. 2966 //File No.2/A-14/SST(F) Gen/PSC/Appli: Dated Peshawar the 2.5 /06/2012

Copy forwarded for information and necessary action to the: Accountant General Khyber Pakhtunkhwa Peshawar.

- Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
- Director of Education FATA Warsak road Peshawar
- All Agency Accounts Officers in FATA:
- Official Concerned

PS to the Secretary to Govi: Khyber Pakhtunkhwa E&SI: Department. PA to the Director E&SE Khyber Pakhtunkhwa, Peshtwar

M/File:

Dy: Directoeress (Estab) Elementary and Secondary Education Khyber Pakhtunkhwh Peshawan



FATA SECRETARIAT DIRECTORATE OF EDUCATION WARSAK ROAD PESHAWAR, PARISTAN PHONE, 091-9210166 FAX 091-9210216

### **ADJUSTMENT**

Consequent upon their appointment as SST in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 2816-23/File No.2/A-14/SST(F)Gen/PSC/Apptt: dated 25-6-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:-

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
]	Naheed Akhtar D/O Musafar Khan (Khyber) Hayatabad Phase-VI Tehsil & District: Peshawar	GGMS Musa Khan Killi Khyber Agency	Against vacant pos
2	Basmina Begum D/O Mir Alam Khan (Mohmand) Village: Shamilat PO: Shergarh Tehsil Takht Bhai Distt: Mardan	GGMS Daag Mula Mohmand Agency	-do-
3	Farzana D/O Riwaj Ud Din (Mohmand) Mohallah Jan Abad Tehsil & District: Mardan	GGMS Imdad Ullah Mohmand Agency	-do
14	ishrat D/O Bahadur Sher (Mohmand)Musakhail Rahmatkor Tehsil Upper Mohmand, Mohmand Agency	GGMS Kachkool Killi Mohmand Agency	-do-

### Note:-

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. However the Agency Education Officers concerned will verify their documents before release of pay.

Endst: No.

### (FAZLI MANAN ) DIRECTOR EDUCATION (FATA)

ADDI · DIREC

2012

OR (ESTAB)

\_\_\_/A-1/Gen Apptt: of SST(F) (PSC) 2012 Dated Fesh: the Copy forwarded to the:

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
  - w/r to his Notification cited above.
  - 2 Agency Education Officers concerned
  - 3 Agency Account Officers concerned
  - 4 Headmistress concerned
  - 5 Candidate concerned
  - 6 P.A to Director Education FATA

N.W.F.P. AVTry. 12-A

GS&PD.NWFP-118-FS.24000-p 16.7.95-(9)

# GOVERNMENT OF KHYBER PUKHTOONKHWA PESHAWAR. CERTIFICATE OF TRANSFER OF CHARGE.

Certified that I, Ishrat D/O Bahader Sher SST Govt: Girls Middle School Kachkool Khawaizai Have this day\_01/07/2012 (F/Noon) Took over charge of the office of Govt:Girls Middle School Kachkool Khawaizai with reference to the Order of the K.P.K Government No9074-82 dated 28/06/2012. Against Vacant SST Post.

4 Particulars of Cash and important/secret/Confidential documents handed over/taken over are noted on the reverse.

Station GGMS, Kachkool Khawaïazai

Signature of relieved Government Servant vacant SST Designation SST.....

Signature of Government Servant receiving charge. Designation S.S.T.G.

S.J. 7. 1. 2012

Dated 01/07/2012

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Endst: No.

Τo

Director of Education, FATA.K.P.K Peshawar w/r to his adjustment No,9074-82 dated

AAO, Mohmands al Ghallanai

AAEO(Concerned at this office).

Acctl/Pay Clerk at this office.

Candidate concerned.

Jack color

....Dated.....

Agency Education Officer. Mohrnarid Agency at Ghallanai.



# NOTIFICATION

- 1. WHERE AS: one Mist. Ishrat D/O Bahadar Sher, who herself appointed/adjusted as SST (G) in GGMS Kachkol Khwazai District Mohmand vide Notification No. 2816-23/File No: 2/A-14/SST(F)/Gen/PSC/Apptt: dated 25/6/2012 and No. 9074-82/A-1 . /General Apptt: of SST (F) (PSC)2012 dated 28/06/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
- AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
- 3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
- 4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Ishrat D/O Bahadar Sher, having no legal status of the said appointment/adjustment order.
- 5. NOW THEREFORE, under the manuatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. 2816-23/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 25/6/2012 and No. 9074-82/A-1 /General Apptt: of SST (F) (PSC)2012 dated 28/06/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Ishrat D/O Bahadar Sher in the interest of Public Service.

### Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

KALL VI

SECONDARY EDUCATION KHYBER PAKHTUNKHWA

7 2019 Copy forwarded with the request to take legal action and recover the outstanding amount from the aforesaid person/individual to the:-

1. Deputy Commissioner, Tribal District Mohmand.

dated

5867-71

Endst: No.

- 2. District Education Officer Tribal District Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
- 3. District Account Officer Tribal District Mohmand to co-operate in the matter.
- 4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
- 5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.



Deputy Diffector Merged Districts

C) KPIL SIGSERSE CALGOS ANNEX H  $\int_{-2}^{1/2} e^{-\frac{1}{2}} e^{$ Oleio 15 sens ssile, and duce 2 jour فرم الم مشر المنبي في والعلى الما ) حرك وم الل -25-06-2012, dus 2826-23 / Sui Est as de VEUTON OLA OLE EN - 1 - Q TOUSUE - I Discound Cally Set Gut end Wesificity ( Tipb ( 2 16 A.E. ) (wohmand) is is - Pry helinse in Vicio a for the star . 3- - - این می روی ز ن مرجع عادن معاد برای - UP 57 - Wind manned on 206 - 4 2 - 6, 00 بالمع كالوالف وهم ويل س المرحم المسبح ومران Ò i whi crew O 5715 - 47-0 0 Jos in fine O 6 من بولا ماند رام روس - غربی ایس مر مجرد و مرز الر اند تحديد من عامد مون - عرن - عرن الل - عرب المرك ال را<sup>ن</sup> فی دان و کاول . - Ca) J's Gens of the EP ATTED



### GOVERNMENT OF KHYBER PAKIFTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT No. SO(PE)/9-4/SST//NMTD/Re-Instatement2019 Dated Peshawar the 26.04.2019

То,

The Director,
 Elementary & Seconday Education
 Khyber Pakhtunkhwa,
 Peshawar.

2. The Director Education, Newly Merged Tribal Districts, Warsak Road, Peshawar.

Subject: - APPEAL FOR RE-INSTATEMENT

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of list bearing No. 1257 dated 19.04.2019 alongwith connected documents in respect of the following female Secondary School Teachers (SSTs) General of merged tribal districts, for further necessary action as per rules/policy, please.

S.No.	Name / F. Name	Address				
1.	Mst. Seema D/O Ikramud Din	GGMS Nahqi, Tribal District Mohmand				
2.	Mst. Ghazala Sana D/O Sana ullah	GGHS, Azeem Kor, Tribal District Mohmand				
-3	Mst. Ishrat D/O Bahadar Sher	GGMS Kachkol, Tribal District Mohmand				
4.	Mst. Asma D/O Muhammad Akbar	GGMS Sabz Ali, Tribal District Mohmand				
5.	Mst. Tahira Shah D/O Fazli Dayan	GGMS Prang Ghar, Tribal District Mohmand				
6.	Mst. Sarwat Jehan D/O Gul Rehman	GGHS Sra Shah, Tribal District Mohmand				
7.	Mst. Nizaqat D/O Said Ali Shah	GGHS Shalam Salai, Tribal District Mohmand				
8.	Mst. Nasrat D/O Hayat Khan	GGHS Badagai, Tribal District Bajaur				
9.	Mst. Nargis D/O Bahadar Khan	GGMS Zarif Abad, Tribal District Bajaur				
10.	Mst. Basra Begum D/O Fazli Wahab	GGHS Raghagan, Tribal District Bajaur				
11.	Mst. Shabana Bibi D/O Abadul	GGHS Anayat Kaly, Tribal District Bajaur				
	Sattar					
12.	Mst. Basmina D/O Mir Alam	GGMS Dag Mula, Tribal District Mohmand				

Yours Faithfully,

SECTIO IMARY)

Encl: as above.

Endstt: of even Number & Date:

Copy to the:-

PS to Secretary, E&SE Department, Peshawar.

SECTION OFFICER (PRIMARY)

دعوي إجرم ابف آ کی آ باعث تحريراً نكبه مقد مه مند رجه بالاعنوان میں اپنی طرف ۔۔۔ واسطے پیروی د جوابد ہی ہما امين الرحمن بوسفز في ايددكين بالى كورث، فيذرل شريعت كورث آف باكستان ايند ستجا دا حم محسود ايددكيت بالى كورت، <sup>ک</sup>وبدین شرط دکیل مقرر کیا ہے کہ میں ہر پیش یرخود یابذ ریعہ مختار خاص روبر وعدالت حاضر ہوتا رہو نگا۔اور بوقت دیکارے جانے مقدمہ وکیل صاحب موصوف کواطلاع دیکر حاضر عدالت کردنگا اگر پیشی پرمن مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی دجہ ہے کسی طور میرے برخلاف ہوگیا تو صاحب موصوف اس کے سی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کس ادرجگہ پا کچہری کے مقررہ اوقات سے پہلے یا پیچھے پابز درتعطیل پیروی کرنے کے ذمہ دارنہ ہوں گے۔اگر مقدمہ علاوہ مسدر مقام کچبری الم الم المراجلة ما عت ہونے پاہر در تعطیل یا کچہر کی کے اوقات کے ایکے پیچھے پیش ہونے برمن مظہر کو کو کی نقصان پنیے تو اس کے ذمہ دار یا اس کے دائے تھی معادضہ کے ادا کرنے یا محنتار نامہ واپس کرنے کے بھی صاحب موضوف ذمہ دار نہ بتوں گے۔ مجھ کوکل ساختہ یر داخته صاحب موصوف مثل کرد ه ذات خود منظور قبول هوگا به ادر صاحب موصوف کو عرضی دعوی و جواب دعومی اور درخواست اجرائ ذ گر به دنظر ثانی اپیل دنگرانی بزنتم کی درخواست پر دستخط دتصدیق کرنے کا بھی اختیار ہوگا۔ادرکسی تکم یا ڈ گری لیے اجرا کرانے ادر برنتم کا ر دیر دو ال کرنے اور رسید دینے اور داخل کرنے اور ہوتم کے بیان دینے اور سپر د ثالثی دراضی نامہ کو فیصلہ برخلاف کرنے ، اقبال دعوی د یے کابھی اختیار ہوگا۔ادربصورت اپیل دیرآ مدگی مقدمہ یامنسوخی ڈگری کیطرفہ درخواست بحکم امترا کی یا قرتی یا گرفتاری قبل از اجرا م ذگری بھی موصوف کوبشر طادا ئیگی علیحد ہمجنتار نامہ پیروی کا اختیار ہوگا۔ادربصورت ضر درت صاحب موصوف کوہمی اختیار بوگایا مقد مہ یذ کور دیا اس کے کسی جز و کی کاروائی کے واسطے یا بصورت اپیل ، اپیل کے واسطے کسی دوسرے وکیل یا بیرسز کو بنجات اپنے یا اپنے ہمراہ مقرر کریں۔ادرا یسے مشیر قانون کو ہرامر میں دہی ادرویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موسوف کو حاصل میں اور د دران مقد مه میں جو کچھ ہرجانہ التواء پڑے گا۔ دہ صاحب موصوف کاحق ہوگا۔اگروکیل صاحب موسوف کو 'یوری فیس تا رہن پیش سے یلے ادا نہ کروں گا تو صاحب موصوف کو پورااختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اورا یسی صورت میں میرا کوئی مطالبہ کسی شم کا سا <sup>ج</sup>ب موصوف کے برخلاف نہیں ہوگا۔لہذا یہ مختار نامہ لکھ دیا کہ سندر ہے مورجہ \_\_\_\_\_ منصوب مغتار نامہ تن کیا ۔ اور التیمی طرح یکمجه دلیا ہے اور منظور ہے۔ ATTESTED & ACCEPTED: Amin ur Rehman Yousafzai Advocate High Court, & Federal Shariat Court of Pakistan. Sajjad Ahmad Mehsu Advocate High Court Peshawar



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# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

### Service Appeal No. 1014/2019

Mst. Ishrat.....Appellant

### VERSUS

### INDEX

S.NO.	PARTICULARS	ANNEXURE	PAGE NO	
1.	Parawise Comments of the Commission		1-3	
2.	Copy of PSC Advertisement 01/2009	"A"	4	
3.	Copy of PSC Merit list	"B"	5-15	
4.	Copy of Authority Letter		.16	

Senior Law Officer Khyber Pakhtunkhwa Public Service Commission Peshawar

UMS88642531 pater, 05/06/2020

FORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1014/2019

Mst. lshrat.....Appellant

### VERSUS

### PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)

### PRELIMINARY OBJECTIONS:

- The appellant neither applied nor was recommended against any of the advertised posts. She is not a genuine recommendee / selectee of the Public Service Commission in respect of the post.
- That the instant Service Appeal is not maintainable against the replying Respondent No.3.
- 3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
- 4. That the appellant is misleading this Honorable Service Tribunal.
- That instant Service Appeal is liable to be dismissed with special cost as the same is based on ulterior motives of the appellant.
- 6. Instant service appeal is based on misrepresentation.

### ON FACTS:

- 1-2. Pertains to personal information of the appellant, no comments.
  - 3. That the Khyber Pakhtunkhwa Public Service Commission advertised 973 posts of SETs/SSTs vide Advertisement No. 01/2009 S.No. 55 dated 26.01.2009 with the following qualifications:

**<u>QUALIFICATION</u>:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

**For Secondary School Teacher (Science) (i)** BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. <u>AGE LIMIT:</u> 21 to 35 years. <u>PAY SCALE:</u> BPS-16 <u>ELIGIBILITY:</u> Female.

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

Furthermore recommendation and list of candidates who were recommended to Government for appointment is (Annex-B).

- Incorrect. The appellant neither applied nor was recommended against any of the said posts. List of the genuine recommendees is annexed as B. The appellant has not provided any proof of her recommendation by the Public Service Commission.
- 5-8. Not pertaining to Public Service Commission.

### GROUNDS.

- A-C. Not pertaining to Public Service Commission.
- D. Incorrect. The appellant concerned is not a recommendee / selectee of the Khyber
   Pakhtunkhwa Public Service Commission as explained in Para 4.
- E. Not pertaining to Public Service Commission.<sup>3</sup>
- F. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.

Submitted for vitting 1 Fifther Vetted subject to no cellar y connection atbachment of annatures and affidavi KHYBER PUBLIC SERVICE PESHAWAR (RESPONDENT NO.03) Furthermore, S-Appeals No, 1027/2019, 1033, 1031/2019,1030/2019, 1029p 974/2019/1016/2019/1025/2019/2019 111/2019, 1028/2019, 1032/2019, Same ice Tribunal

AFFIÐAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

### DEPONENTS

n L

CHAIRMAN KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION PESHAWAR (RESPONDENT NO.03)

NWFP PUBLIC SERVICE COMMISSION 2- Fort Road Peshawar Cantt: Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

Anner-A

# Advertisement No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

**<u>QUALIFICATION:</u>** For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 40 years. <u>PAY SCALE</u>: BPS-16 ELIGIBILITY: Female.

ALLOCATIC	DN: The large state	an ARMA Say R			
Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122
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R-SEGI Amere B (12) MERITLIST of Femile 557 (Science)

: جبيع س

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S.		Total	Interview		Name with Father's	District	
No		Marks 71	Marks 46		Name Salma Ragib D/O Ragib	Bannu/4	- 49
					Baz Khan	Karak/4	
	2.	70	46	the second s	Malghalarah D/O Mahboob ur Rahman		M US/3
-	3,	69	46	25/2/83	Rafia Tareen D/O Munir Ahmad Tareen	D.I Khan/4	, 21/4
	4.	69	46	12/4/83	Afshan All D/O Muhammad All	Karak/4	M 13/9
	5.	69	45	7/12/78	Safla Japsen D/O Haris Magbool Khan	D.I Khan/4	
	6.	69	45	30/3/80	Zakia Mehboob D/O Mian Mehboob Ullah	Nowshera/2	
	7.	69	45	4/5/83	Fatima Anwar D/Q Muhammad Anwar	D.I Khan/4	M 22/4
	8.	69	45	7/4/84	Nasima Akhtar D/O Umer	Tank/4	M
-	9.	68	46	22/8/81	Khan Sajida Syed D/O Kachkol	Kohat/4	
-	- <del>.</del> .	68	46	14/3/84	Shah Naboola D/O Sarfaraz Khan	Swabi/2	
	11.	68	46	8/9/85	Khan Nabeela Gul D/O	Kohat/4	M BA
	12.	68	45	9/10/81	Faizullah Khan Nazia Nasreen D/O Zurial		The set of the
	_			5/11/33	Khan Sahira Fatima D/O	Karak/4	M
	13.	68	45		Muhammad Usman	D.I Khan/4	M ??/ 1
•	14,	68	45	1/5/84	Sumera Abdus Sattar D/O Adus Sattar		
	15.	68	44	18/9/83	Irum Nigah D/O Nizab Hussain	Reshawar/2	
	16,	67	45	20/2/80	Safla Zaman D/O Muhammad Zaman Khar	D.I Khan/4	M
/ ``	17.	67	45	15/5/83	Jameela Bano D/O Muhammad Aslam Azad	Lakki Marwat/4	
R	18.	67	45	10/4/84	Saima Mehnaz D/O	Karak/4	M
2	19.	67	. 45	19/5/84	Nadia Begum D/O Kamil Khan		M 15/3
P	20.	67	45	27/4/85	Nasrah Rubah D/O Zawa	r. D.I Khan/4	a noti
Ĵ	21,	67	45	10/8/85	Hussain Miss Risz Bibl R/O	D.I Khan/4	M
ł	22.	67	44	1/4/84		ir Peshawar/2	H
ł	23.	67	44	15/6/84	Gul Sadia ibad D/O ibadulla	h Nowshora/	2.5
ł	24.	67	44	5/1/85	Shaista Khan D/O Farha	d Mardan/2	6
X	25	. 66	46	13/11/7	Khan I Syèda Salmi, Anjum D/	) Bannu/4	M
	/ 28	. 66	45	31/3/81	Syod Hashim All Shah Shehla Gul Sigdiqi D/O	Nowshera	2 7
1	\   <sub>7</sub>				Muhammad Vayod Siddiqi		
7	27	. 66	45	23/11/8	1 Sanobar Khan D/O Sohrab Khan	Kohat/4	M 22/
X	28	. 66	45	10/3/80	Nazla Qayyum D/O Abo Qayyum	li:I D.I Khan/4	25/4
$\mathbf{i}$	< 29	. 66	44	17/5/78		Poshawar	28
X	30	. 66	44	11/4/8	Iram Khan D/O Sher Di	Swabl/2	9
V	31	. 66		4/10/8		Kohat/4	
ſ	]				D/O Naseer Ahmad Bangash	•	
V	× 31	2. 66	5 44	10/10/8		Bannu/4	
~	3	3. 68	5 44	. 1/5/8		Dil Khan/4	

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	34.	66	44	28/3/86 -	Nazia Riaz D/O	Haripur/5	1440
i s	35.	66	43	4/1/84	Muhammad Riaz Akhtar Mamoona Gul D/O	Charsadda/2	and a second br>Second second br>Second second
~ _X	36.	66	43	1/8/84	Ahmavid Khan Rizwana Bibi D/O Sahib	D.1 Khan/4	21/9
~ √X	37.	66	43	27/10/84	Jan Farah Ayub D/O	FR Tank/1	
, Y	38.	66	43	3/4/86	Muhammad Ayub Khan Sana Jamal D/O Hazrat	Mardan/2 //	
	9	66	42	23/12/83	Jamal Shabana D/O Farhad	Swab1/2 12 M	
$\mathbf{v}$	40,	66	42	24/12/83	Saba Suleman D/O Muhammad Suleman	Harlpur/5	1413
N N	41.	65	46	15/3/84	Sania Nizam D/O Nizam ud Din	Kohat/4	
v N	42.	65	46	16/2/86	Fatima D/O Abdul Nazeer	Swabl/2	جو به جو به المراجع ال مراجع المراجع ال
v N	43.	65	45	31/3/83	Shahida Mehreen D/O Fazal Hag	Karak/4	. j
Y	44.	65	45	13/4/84	Nosheen D/O Khanan Khan	Swabl/2	
	45.	65	44	1/3/79	Amina Ramzan D/O Muhammad Ramzan	D.I Khan/4	4.
	16.	65	44	30/12/80	Rukhsana Gul D/O Gul Mar Khan	Lakki Marwat/4	
Ň	47.	65	44	12/10/81	Sadla Anwar D/O Rrof: Muhammad Anwar Khan	Charsadda/2	<b>7</b>
	48,	. 65	44	15/3/82	Nusrat Begum D/O Mustafa Kamal	Khyber Agy/1	
L.	X 49.	65	44	14/4/85	Samreen Noor D/O Noor Muhammad	S.W Agy/1	·
r	50.	65	43	20/3/82	Shabnam Fatima D/O Ghulam Hassan	D.I Khan/4	
· · ·	x 51.	65	43	3/4/83	Nadia Norgen D/O Muhammad Sherin Khan		M
, /	52.	65	43	17/4/85	Salma Kifayat D/O Kifayat Ullah	Mardan/2 17	
( \m	53	65	42	1/1/81	Taskeen Bibl D/O Shamas Khan	Swabl/2 18	M
V	X 54	65	42	1/5/83	Maria Khatoon D/O Muhammad Niaz	Abbottabad/5	8/438
	55	. 65	42	10/5/83		Harlpur/5	P/400 - 1
مور کی ان اور	56	65	42	22/11/8		Mardan/2 19	M
	57	. 64	45	11/4/73	and the second	q D.I Khan/4	13/9
	58	. 64	45	28/2/82	Shamshad' Bibi D/O	D.I Khan/4	M 22/5
	59	64	44	23/3/80		Nowshera/2 7	
4	X 50	64.	44	4/12/83	the second se	Charsadda/2	M
	X	1. 64	44.	1/11/80		Lakki Marwat/4	M >>/9
		2. 64	43	27/3/0		Agy/1	
	X 6	3. 64	42	4/4/79	Nalla Noreen D/O Muhammad Anwar	Poshawar/2 7	
2.5 T		4. 64	42	28/8/8		Marisohra/5	1/445
		5.) 64	42	14/4/8	and any other states and the second states and the second states and the second states and the second states and	Mardan/2 77	M
	X 6	6. 64	. 41	10/2/8		lk Peshawar/2	M
	J G	7. 64	. 41	16/4/8		Mar/lan/2	$\mathcal{A}$
	$\mathbf{x}^{6}$	8. 64	41	9/8/8		Mardan/2	46
	X 6	9. 6		2.1/3/8	5 Kalsoom Mumtaz D/O		121
	X 77	0 ) 64		29/3/8		D.! (\han/4	15/3
	V L	//		, 	Muhammad Naseer Jo	<u>70 - 20086 - 200</u>	

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71.         63         45         7/11/80         Safia Naz D/O Habib         Charsadda/2         %           72.         63         44         6/8/78         Noshaba Cocab D/O         D.I Khan/4         MM           73.         63         44         10/2/86         Noursen Nazir D/O Nazir         Charsadda/2         MM           74.         63         43         27/4/78         Shafida Begum D/O         Bannu/4           76.         63         43         27/4/78         Shafida Begum D/O         Mardan/2         M           76.         63         43         8/1/80         Nazia Begum D/O         Manau/4         Mardan/2         M           76.         63         43         8/9/82         Shumalia Hussain D/O         Manau/4         Mardan/2         M           77.         63         43         25/9/82         Aasma Quresh) D/O         Marwat/4         12/9           78.         63         43         6/4/86         Madia Neeinam D/O         Banu/4         M           78.         63         42         12/9/82         Noeinam Safia D/O         Poshawar/2         M           80.         63         42         12/9/82         Noeinam Tii D/O         Swabi/	
Y         1.         63         43         1/1/04         Uilah         Uilah           72.         63         44         6/8/78         Noehaba Cocab D/O         D.I Khan/4         YM           73.         63         44         10/2/86         Nourgen Nazir D/O Nazir         Charseadda/2         Muhammad           74.         63         43         27/4/78         Shaflad Basum D/O         Bannu/4           74.         63         43         8/1/80         Nazia Begum D/O         Bannu/4           75.         63         43         8/1/80         Nazia Begum D/O         Hanga/4           76.         63         43         8/9/82         Shumalla Hussain D/O         Marwat/4           77.         63         43         25/9/82         Aagma Qureshi D/O         Hangu/4           77.         63         43         25/9/82         Noehaga D/O         Bannu/4           78.         63         43         6/4/86         Nagla Neshgen D/O         Bannu/4           78.         63         42         1/9/9/82         Neshgen D/O         Bannu/4         M           80.         63         42         12/9/82         Neshaga D/O         Bannu/4         M<	
Y1.       63       43       Y1100       Uilah       Uilah         72.       63       44       6/8/78       Neshaba Cocab D/O       D.I Khan/4       Y44         73.       63       44       10/2/86       Nourgen Nazir D/O Nazir       Charsadda/2       Y44         73.       63       43       27/4/78       Shaflad Basum D/O       Bannu/4         74.       63       43       27/4/78       Shaflad Basum D/O       Bannu/4         76.       63       43       8/1/80       Nazia Begum D/O       Hanga/4         76.       63       43       8/9/82       Shumalla Hussain D/O       Mardan/2       Y6         77.       63       43       8/9/82       Shumalla Hussain D/O       Marwat/4       Y7         77.       63       43       6/4/86       Nadla Neshgen D/O       Bannu/4       Y7         78.       63       42       3/4/77       Sala Splad D/O       Bannu/4       Y7         80.       63       42       12/9/82       Neelam Tal D/O       Swabl/2       Y4         78.       63       42       13/9/82       Neelam Tal D/O       Swabl/2       Y4         80.       63       42	
72.       63       44       6/8/78       Noshaba Cocab D/O Hameed Ullah       D.I.Khan/4       WM Hameed Ullah         73.       63       44       10/2/86       Noursen Nazir D/O Nazir Muhammad       Charsadda/2       M         74.       63       43       27/4/78       Shafida Besum D/O       Bannu/4         74.       63       43       27/4/78       Shafida Besum D/O       Bannu/4         75.       63       43       8/1/80       Nazia Besum D/O       Mardan/2       M         76.       63       43       8/9/82       Shamalla Hussain D/O       Mardan/2       M         76.       63       43       25/9/82       Asema Qureshi D/O       Bannu/4       M         77.       63       43       25/9/82       Asema Qureshi D/O       Bannu/4       M         78.       63       43       5/4/86       Nadia Nsehson D/O       Bannu/4       M         80.       63       42       12/9/82       Lubna Serai D/O, Sarai       Swabi/2       M         810.       63       42       13/9/82       Lubna Serai D/O, Sarai       Swabi/2       M         82.       63       42       12/9/82       Lubna Serai D/O       Manammad <td></td>	
73.         63         44         10/2/86         Noursen Nazir D/O Nazir         Chareadda/2         71           74.         63         43         27/4/76         Shafida Begum D/O         Bannu/4           76.         63         43         8/1/180         Nazia Begum D/O         Bannu/4           76.         63         43         8/9/82         Shumalla Hussain D/O         Hangu/4           77.         63         43         25/9/82         Shumalia Hussain D/O         Hangu/4           77.         63         43         25/9/82         Shumalia Hussain D/O         Hangu/4           77.         63         43         25/9/82         Assma Qurgehi D/O         Bannu/4           77.         63         43         5/4/86         Nadia Noshaan         Marwau/4           78.         63         42         3/4/77         Safia Irshad D/O         Bannu/4         M           80.         63         42         12/9/82         Lubna Sara D/O         Bannu/4         M           81.         63         42         13/9/82         Neelam Tal D/O Sara Sara D/O         Swabl/2         M           81.         63         42         11/1/83         Shora Bogum D/O	
74.         63         43         27/4/78         Shafida Begum D/O         Bannu/4 Andaz Ali Khan           75.         63         43         6/1/80         Nazia Begum D/O Wall         Mardan/2         7           76.         63         43         6/9/82         Shumalia Hussain D/O         Hangu/4         Muhammad Hussain D/O         Hangu/4           77.         63         43         25/9/82         Asema QHreshi D/O         Marwat/4         17/6           77.         63         43         25/9/82         Asema QHreshi D/O         Bannu/4         Marwat/4         17/6           78.         63         43         5/4/86         Nadia Nosheen D/O         Bannu/4         M           78.         63         42         3/4/77         Safia Ireling D/O         Bannu/4         M           80.         63         42         12/9/82         Lubna Safai D/O Saraj         Swabi/2         7           81         63         42         13/9/82         Neelam Tai D/O Taj         Dir Lower/3         M           82.         63         42         11/9/83         Alshe Bano D/O         Swat/3         A/38/5         M/38/5         M/38/5           34.         63         42	
75.       63       43       8/1/80       Nazja Begum D/O Wali       Mardan/2	
76.       63       43       8/9/82       Shumalla Hussain D/O Muhammad Hussain       Hangu/4         77.       63       43       25/9/82       Assma Qureshi D/O M. Rehman       Lakki Marwat/4       12/6         78.       63       43       6/4/86       Nadia Nosheen D/O Sularn Rascol       Bannu/4       M         78.       63       42       3/4/77       Safia Irshad D/O Muhammad, Shabih UI       Peshawar/2       A         80.       63       42       12/9/82       Lubng Saral D/O Saral Muhammad       Swabi/2       72/4         81.       63       42       13/9/82       Neelam Tal D/O Taj Muhammad       Dir Lower/3       73/5         93.       63       42       1/1/83       Shoraz Bogum D/O Muhammad       Swat/3       73/5         93.       63       42       1/1/83       Alsha Baijo D/O Muhammad       Mansehra/6       P/39/53         93.       63       42       11/1/83       Alsha Baijo D/O Muhammad Ashraf       Mansehra/6       P/39/53         94.       63       42       11/1/83       Ratia Percen D/O Hajitt       Karak/4       M       2/         85.       63       42       1/1/84       Sadia Bai       D/O Fazal       Dir Lower/3       M	
77.         63         43         25/9/82         Aasma Qureshi D/O M.         Lakki Marwat/4         17/4           78.         63         43         5/4/86         Nadia Noshoen D/O         Bannu/4         M           79.         63         42         3/4/77         Safia Irshad D/O         Muhammad.Shabih UI         M           80.         63         42         3/4/77         Safia Irshad D/O         Peshawar/2         7           80.         63         42         12/9/82         Lupna Saraj D/O.Saraj         Swabi/2         7/4           80.         63         42         12/9/82         Lupna Saraj D/O.Saraj         Swabi/2         7/4           81         63         42         13/9/82         Neelam Taj D/O Taj         Dir Lower/3           82.         63         42         11/1/83         Shoraz Bogum D/O         Swat/3           9.3         63         42         11/1/83         Alsha Bajjo D/O         Mansehra/5           9.3         63         42         11/7/63         Zahida Sharif         Bannu/4           9.3         63         42         11/1/83         Razia Perveon D/O Sahrif         Bannu/4           85.         63         42	
78.       63       43       6113       Ghulam Rascol       Peshawar/2       A         79.       63       42       3/4/77       Safia irshad D/O Muhammad Shabih Ui Hassan       Peshawar/2       A         80.       63       42       12/9/82       Lubna Saraj D/O Saraj Mulammad       Swabi/2       22M         81.       63       42       13/9/82       Neelam Taj D/O Taj Muhammad       Dir Lower/3         82.       63       42       11/83       Shoraz Begym D/O       Swat/3         44.       63       42       22/6/83       Alsha Bano D/O       Mansehra/5         84.       63       42       11/7/83       Zahida Sharif D/O Sahrif       Bannu/4         85.       63       42       23/11/83       Razia Perveen D/O Hajit       Karak/4       M       2/4         86.       63       42       1/1/84       Sadia Bibl D/O Fazal       Dir Lower/3       M       2/4         87.       63       42       1/2/95       Rohina Naz D/O Wasal       Charsadda/2       3/4	
79.       63       44       Virtin Muhammad Shabih Ui         Hassan       Hassan       Hassan       Swabi/2       Juniammad         80.       63       42       12/9/82       Lubna Saraj D/O Saraj       Swabi/2       Juniammad         81       63       42       13/9/82       Neelam Taj D/O Taj       Dir Lower/3         81       63       42       13/9/82       Neelam Taj D/O Taj       Dir Lower/3         82.       63       42       1/1/83       Shoraz Bogum D/O       Swat/3         982.       63       42       1/1/83       Shoraz Bogum D/O       Swat/3         983.       63       42       1/1/83       Shoraz Bogum D/O       Mansehra/5         984.       63       42       11/7/83       Zahlda Sharif D/O Sahrif       Bannu/4         84.       63       42       11/7/83       Zahlda Sharif D/O Sahrif       Bannu/4         855.       63       42       23/11/83       Razia Porveen D/O Hajit       Karak/4         866.       63       42       1/1/84       Sadia Bibi D/O Fazal       Dir Lower/3         877.       63       42       1/2/35       Rohina Naz D/O Wagal       Charsadda/2       2/2 <td>•••</td>	•••
80.       63       42       12/9/82       Lubna Saraj D/O, Saraj Mulammad       Swabi/2       22/1         81       63       42       13/9/82       Neelam Taj D/O Taj Mulammad       Dir Lower/3         81       63       42       13/9/82       Neelam Taj D/O Taj Mulammad       Dir Lower/3         82.       63       42       1/1/83       Shoraz Bogum D/O       Swat/3         9.3.       63       42       22/6/83       Alsha Bajio D/O       Mansehra/5         9.3.       63       42       22/6/83       Alsha Bajio D/O       Mansehra/5         9.3.       63       42       22/6/83       Alsha Bajio D/O       Mansehra/5         9.4       84.       63       42       11/7/83       Zahlda Sharif D/O Sahrif       Bannu/4         85.       63       42       23/11/83       Razia Rerveen D/O Hajit       Karak/4         86.       63       42       1/1/84       Sadia Bibi D/O Fazal       Dir Lower/3         87.       63       42       1/2/35       Bohina Naz D/O Wasal       Charsadda/2	
81       63       42       13/9/82       Neelam Taj D/O Taj Muhammad       Dir Lowen/3         82.       63       42       1/1/83       Shoraz Bogum D/O       Swat/3         3.       63       42       1/1/83       Shoraz Bogum D/O       Swat/3         3.       63       42       22/6/83       Alsha Bano D/O       Mansehra/5         3.       63       42       22/6/83       Alsha Bano D/O       Mansehra/5         84.       63       42       11/7/83       Zahlda Sharif       Bannu/4         85.       63       42       23/11/83       Razia Perveen D/O Hajit       Karak/4         86.       63       42       1/1/84       Sadia Bibi D/O Fazal       Dir Lower/3         87.       63       42       1/2/95       Ropina Naz D/O Wasal       Charsadda/2	
82.       63       42       1/1/83       Shoraz Bogum D/O       Swat/3         J3.       63       42       22/6/83       Alsha Bano D/O       Mansehra/5       P/39.5         84.       63       42       11/7/83       Zahlda Sharif D/O Sahrif       Bannu/4       P/39.5         85.       63       42       23/11/83       Razia Rerveen D/O Hajit       Karak/4       M       27         86.       63       42       1/1/84       Sadia Bibi D/O Fazal       Dir Lower/3       M       27         87.       63       42       1/2/35       Rohina Naz D/O Wasal       Charsadda/2       27	6
J3.       63       42       22/6/83       Alsha Bano D/O       Mansehra/5       M// 3/5         84.       63       42       11/7/83       Zahlda Sharif D/O Sahrif       Bannu/4         84.       63       42       11/7/83       Zahlda Sharif D/O Sahrif       Bannu/4         85.       63       42       23/11/83       Razia Rerveen D/O Hajit       Karak/4         86.       63       42       1/1/84       Sadia Bibi D/O Fazal       Dir Lower/3         86.       63       42       1/2/35       Rohina Naz D/O Wasal       Charsadda/2         87.       63       42       1/2/35       Rohina Naz D/O Wasal       Charsadda/2	1 1 13
84.     63     42     Ullah Khan       85.     63     42     23/11/83     Razia Rerveen D/O Hajit     Karak/4       86.     63     42     1/1/84     Sadia Bibl D/O Fazal     Dir Lower/3       87.     63     42     1/2/35     Bohina Naz D/O Wasal     Charsadda/2	
85.         63         42         2011/00         Bad Shah           86.         63         42         1/1/84         Sadia Bibi D/O Fazal         Dir Lower/3           86.         63         42         1/1/84         Sadia Bibi D/O Fazal         Dir Lower/3           87.         63         42         1/2/35         Bohina Naz D/O Wasal         Charsadda/2	• •
86. 63 42 1/1/54 Ghani Ghani 87. 63 42 1/2/35 Bohina Naz D/O Wasal Charsadda/2 92 Khan	19
87. 63 42 1/2/35 Ropina Naz D/O Wasal Charsaddar 77 Khan	
A2 A2 A2 Tania Gui D/O Sher Di Swadu 4 944A	
Khan Khan	
W X 89. 63 42 0/0/00 Muhammad Ghulam Agy/1	ء مربع بر المبلغ بر المبلغ
90. 63 42 Soldio Razag	
91. 63 41 Muhammad Jan	· · ·
Malik Malik	
Winammad Qasim Muhammad Qasim	
94. 63 41 0/3/00 Azam Khan Azam Khan	K
95. 63 40 Shahzada Khan Shahzada Khan D/O Mardan/2 20 M	
Akram Khan Mansehra/5	37
Zeb	
A 2/3/85 Fouzia Amin D/O Mardan/2	• •
V 100. 63 40 8/8/85 Shahzina D/O Mahabat F.R Bannu/1	
Khan	33
102 63 40 26/3/86 Irum Naz D/O Behram Mkd Agy/3	
102. 60 Khan 103. 62 43 21/9/79 Nagina Rehman D/O Gul Peshawar/2 4/0	
104. 62 42 29/1/85 Alla Bibi D/O Sher All Swabi/2 4	
105. 62 42 12/3/85 Asma Yaqoob D/O D.I Khan/4 12/ Muhammad Yaqoob	8
106. 62 42 4/9/85 Mahwash Zahoor D/O Mardan/2 47	

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	$\sim$	10			30/11/8	35 Sarwat iftikhar D/O Iftikhar Ahmad	Mansehra/5	1/438
* /	$\checkmark$	× 10	62	41	22/9/8	6 Amira Jadoon D/O Ham	nid Abbottabad/	5 P/38 5
	1	10: 		41	1/3/87	Shazia Naeem D/O Shaukat Ali	Swabi/2	43
0	$\sim$			40	2/7/78	Rubina Shaheen D/O Manzoor	Harlpur/5	Plyor
	Ň			40	1/3/81	Salra Bano D/O Mira. Khan	Mohmand	-17
	X	1 112		40	1/1/82	Hashmat D/O Samand Khan	Agy/1 Swabl/2	EM .
:	Х	/13		40	16/4/83	Faiza Hamid D/O Hamid Ullah Khan	Charsadda/2	15
	$\mathcal{X}$	> 114		40	10/5/83	Minhas Aman D/O Amai Sher	n Mardan/2	Cili-
	X	115		40	12/4/84	Sara Ihsan D/O Ihsan Ullah	Charşadda/2	47
	X	116		40	12/4/84	Saira Faiz D/O Faiz Muhammad	Charsadda/2	List .
\$ <del>.</del>	$\vee$	117		40	1/6/84	Nasira Begum D/O	Dir Lower/3	
	$\sim$	118	62	40	1/9/84	Muhammad Zubair Gul Rukh D/O Nurui Qudus	Peshawar/2	-ug
	X	119,	62	40	1/1/86-	Nousheen Razig D/O	Abbottabad/5	DIHOL
·	X	120.	62	40	11/1/86	S.Fazle Raziq Rubika Nasem D/O	Abbottabad/5	
	×	121.		39	16/3/85			56400
	X	122.	61	43	11/4/84	Salma Ayaz D/O Mir Aya Khan		
$\mathcal{A}$	( 4	123.	61	43	21/4/84	Humera Shamshad D/O Shamshad Khan	Nowshera/2	A
Au	X	124.	61	42	1/9/82	Alaha Qazi D/O Qazi Abdul Wahab	Peshawar/2	5.27
	V	125.	61	42	5/2/85	Shazia Ayub D/O Ayub Khan	Khyber	
	×	126,	61	42	28/2/25	Sheeba Wadud D/O Abdul Wadud	Agy/1 Swabl/2	M
	Y	1.27.	61	42	5/1/87	Nalla Yahya D/O Yahya Gul	Charsadda/2	\$3
ij	X	128.	61	41	11/7/80	Asmat Bibi D/O Ghulam Sarwar	Swabl/2	54
		129,	61	41	1/11/80	Safla Naz D/O Zardullah Khan	Mardan/2	55
	X	130.	61	40	19/12/77	Shazia Afridi D/O M.Akram Afridi	Khyber	
		131,	61	40	11/11/79	Sara Falz D/O Falz ul Hassan	Agy/1 Charsadda/2	56
		132,	61	40	22/2/80	Sarwat Jabeen D/O Muhammad Zaheer	Mardan/2	C-i
	X	133,	61	40	28/4/81	Saira Bafig D/O Muhammad Rafig	Haripur/5	Plus
		134.	61	40	4/11/82	Sadia Rauf D/O Abdur Rauf	Mardan/2	en
	X.	135.	61	40	14/3/83	Meliwişii İbrar D/O Muhammad Ibrar	Haripur/5	55 D1,
		136,	61	40	20/4/83	Nazis Begum D/O Muhammad Nishat	Swabi/2	59
		137.	61	40	1/7/83	Anlla Khan D/O Rasool	Peaking	30
		138.	61	40	1/2/84	Khan (Lute) Nadia Gui D/O Risal	Novoharalo	
N		139.	<u>61</u>	40	1/2/84	Khan Salma Bibi D/O Abdul	Harlpu:/5	
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		142.	61	40		Rahim		21/2
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	144.	61	40	1/10/86	Shazma D/O Mir Hassan	Mardan/2	•
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	50,	61	39	22/2/85	Shumalia Alam D/O Sher Alam Khan	Mardan/2 70	1 4
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	156,	61	38	9/10/84	Lubna Shafiq D/O Shafiq = ur Rehman B	Karak/4	بر بر اور م
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	167,	60	40	26/12/83	Neelam Azra Khattak D/O Muhammad Zarin Khattak	Nowshera/2	• • •
$\mathbf{X}$	168.	60	40	21/3/84	Irrum Manzoor D/O Manzoor Ahmad	Mansehra/5	14/4
	169.	60	40	12/4/84	Nazla Regum D/O Yar Muhammad	Mardan/2	
	170.	60 60	40 4 0	1/1/85	Sakeena Afridi D/O Muhammad Nawaz	Peshawar/2	
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	79.	60	38	15/2/78	Farsat Begum D/O Azim Khan	Swabi/2	
	180.	60	38	.11/1/80	Khadija Shakir D/O Muhammad Shakir	Mansehra/5	8/443
	181.	60	38	13/4/82	Mishah Akram D/O Muhammad Akram	Abbottabad/5	8/425
	182.	60	38	3/10/85	Shazla Rafiq D/O Syed Rafiq Shah	Charsadda/2	
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	184.	60	37	6/12/81	Sarah Mazhar D/O Mazhar ul Hag	Mardan/2	
X	185.	60	37	19/8/84	Adeela Hakeem D/O Hakim Ullah Qazi	Dir Lower/3	
	36.	60	37	5/1/85	Sumaira Noor D/O Syed Noor ul Basar	Mardan/2	
	187.	60	36	26/12/80	ZijiaiHuma D/O Muhammad Jehangir Khan	D.I Khan/4	· · · · ·
. F	188.	60	36	12/4/85	Nadla Bibi D/O Zar Wall Khan	Bannu/4	
$\sqrt{\lambda}$	- 189.	60	36	15/3/86	Tahira Jabeen D/O Muhammad Najib Ullah	Chitral/3	1
v I	190.	59	41	15/9/83	Zahida D/O Hazrat Bilal	Peshawar/2	
	191.	59	41	1/1/86	Huma Gul D/O Muhammad Younas	Charsadda/2	
[]	192.	59	40	20/3/79	Fazilat Khattak D/O Sarfaraz Khattak	Nowshera/2	
	193.	59	40	25/4/82	Shahzadi Seema D/O Ahmad Shah	Swabl/2	
X	194.	59	40	9/4/83	Sohalla Rani D/O Said Muhammad Shah	Chitral/3	
	195,	59	40	1/4/84	Yasmeen Habib D/O Habib ur Rehman	Lakki Marwat/4	
	196,	59	40	1/1/85	Marifat Jahan D/O	Nowshera/2	
	197.	59	40	23/3/86	Nazish Ali D/O Irshad Ali	Nowshera/2	
	198.	59	39	15/11/78	Shahab Afroz D/O Hashmat Ullah khan	Charsadda/2	
	199	59	39	23/3/80	Sarwat Sohrab D/O Sohrab All Khan	Mardan/2	
	200.	59	39	4/2/82	Saima Bibi D/O Muhammad Ashraf	Mansehra/5	
	201.	59	39	1/4/82	Hameeda Naz D/O Abdur' Rauf Khan	Swabl/2	]
	202.	59	39	6/1/84	Nazla Sultana D/O Zardad Khan	Karak/4	
$\sim$	<u>203.</u>	<del>5</del> 9	39	20/8/85	Saeada P/O Ahmed Jan	Mkd Agy/3	]
	204.	59	39	19/7/87	Neolam Asad D/O Asad Khan	Peshawar/2	
	205.	59	38	1/5/78	Shazla Norin D/O Athar Din	Abbottabad/5	
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	210.	59	38	9/3/83	Shehla Sahfique D/O Shafique ur Rehman	Mansehra/5	]/.
	211.	59	- 38	21/10/83	Shagulta Naz D/O Zahir Zaman	Swabi/2	M
	212.	59	38	1/3/85	Gul Sheercon D/O Aziz ur Rehman	Haripur/5	1/30
	213.	59	37	6/7/82	Vobla Mashkoor D/O Mashkoor Ahmad Sabar	Mansehra/5	1
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					Saba Naz D/O	Mansehra/5	
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	288.	57	37	· · · [_	Shumalla Nisar D/O Nisar Ahmad		
	289.	57	36		Shumalla Noureen D/O Muhammad Hayat Khan	Bannu/4	
-	290.	57	36		Suriya Mehnaz D/O Rais Khan	Karak/4	
	291.	57	36	4/4/82	Nadia Bibl D/O Manzoor Elahi	Haripur/5	•
-	292.	57	36	10/2/83	Fareena Mahak D/O Abdul Rasheed Khan	D.I Khan/4	
	. 293.	57	36		Samra Tul Ain D/O Haji Mushtaq Ahmad	Peshawar/2	
	<u>^94.</u>	57	36	31/3/83	Salma Saeed D/O Khan Saeed	Charsadda/2	
	295.	57	36	27/3/84	Salma Saeed D/O Muhammad Saeed	Kohat/4	
men in V	296.	57	36	3/1/85	Rukhsana Zaib D/O Alam	Mkd Agy/3	
	297.	57	36	1/3/85	Zalb Rifat Niaz D/O Umar Niaz Khan J	Bannu/4	
2	298.	57	36	19/3/85	Sumeerah Yasmin D/O Ahmad Nawaz	D.I Khan/4	
۶. ۲	299.	57	36	23/3/85	Alsha Naz D/O Mirza Ali Khan	Karak/4	
din .	300.	57	36	23/2/86	Zartasha Khan D/O Jehanzeb Khan	Abbottabad/5	•
, v	301.	56	39	4/2/85	Shagufta Rehman D/O Muhammad Rehman	Bajaur Agy/1	
	- 302.	56	38	20/12/84	Najmusahar Bibi D/O Sher Zaman Shah	Mardan/2	
	303.	56	38	19/7/86	Ayesha Bibi D/O Haq Nawaz	Nowshera/2	
- V	304.	56	37	13/4/79	Parveen Nisa D/O Sakhawat Shah	Buner/3	
	305.	56	37	30/3/80	Musarrat Begum D/O Habib Jan	Dir Lower/3	
·	306.	56	37	12/3/81	Ulfat Begum D/O Tayyab Jan	Mardan/2	
	X 307.	56	37	3/12/81	Rohl Omar D/O Hazrat Omar	Mkd Agy/3	
	38.	56	37	1/3/83	Yasmin Gul D/O Sher Bahadur	Mansehra/5	· · · ·
	309.	56	37	11/4/83	Sabeen Begum D/O Gulzar Muhammad	Nowshera/2	•
	310.	56	37	1/1/84	Sheema Rehman D/O Yousaf Rehman	Swabi/2	
× v	/ 311.	56	37	15/3/85	Saira Gul D/O Gul Nawaz Khan	Chitral/3	
Ý	312	. 56	37	31/3/86	Saima Gul D/O Abdul Fateh	Charsadda/2	] .
	313	. 56	36	25/2/75	Saira Bibi D/O Gul Payao Khan	Karak/4	
	314	. 56	36	12/11/77	Gulshan Ara D/O Habib Ullah Khan	Lakki Marwat/4	
	ა <u>15</u>	. 56	36	4/1/78	Shabnam Ara Bibi D/O Shah Pasand	Mardan/2	
	316	. 56	- 36	13/9/79	Bibl Mahnaz D/O Muhammad Akram Jadoon	Abbottabad/5	0/392
	317	. 56	36	12/10/80		Abbottabad/5	•
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	319	. 56	. 36	23/11/83		Haripur/5	
	320	). 56	36	12/12/83	Sabina Bibi D/O Khan Afsar Khan	Abbottabad/5	
	321	1. 56	36	1/3/84	Shabina D/O Fazal Gul	Swat/3	
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	322.	56	36	16/3/84	Noushen Kausar D/O	Peshawar/2	(14)
	323.	56	36	14/6/84	Ghulam Rabbani Irum Nausheen D/O	Karak/4	
	324.	56	36	1/9/85	Muhammad All Khattak Amine Hergon D/O	Mansehra/5	RIZUL
	325,	56	36	7/10/85	Muhammad Haroon Surrya Anjum D/O	Dir Lower/3	1 000
	326,	56	36	25/12/87	Muhammad Nagin A Nosheen Hamayun D/O Syad Hamayun Shah Bacha	Mardan/2	
	327.	55	39	1/4/82	Alla Bibi D/Q Muhammad Tahirullah	Peshawar/2	
	328,	55	39	26/3/84	Sedal Afreen D/O Abdul Rehman	Harlpur/5	
	329.	55	38	11/7/85	Jasmael Kumari D/O Ram Saroop	Swat/3	•
X	<del>3</del> 30,	55	38	2/2/87	Siyam'Akbar D/O Muhammad Akbar	Mohmand Agy/1	
	331,	55	37	5/2/76	Baheela:Bahman D/O Abdur Rehman	Dir Lower/3	
	332,	55	37	4/6/77	Zahida D/O Abdul Hamood Khan	Buner/3	
	333.	55	37	19/3/80	Sadal Saboor D/O Abdus Saboor Saboor D/O Abdus	Harlpur/5	
	334,	.55	37	17/12/82	The start of the s	Beshawar/2	]
ĸ	335,	55	37	1/1/85	Salaanava khian D/O	Nowshere/2	
1	- 336,	55	37	30/4/85	Zeinspissegum D/O Muhammad Khurshid	Swabl/2	]
	. 37,	55	, 37	14/8/85	Azra Gul D/O Muhammad	Mardan/2	
	338.	55	37	14/8/85	Menwish Mushted D/O Mushtad Ahmad	Abbottabad/5	
	339,	55	37	.20/7/86		Charsadda/2	
	340,	55	36	16/8/73	Agesishar D/O Ghulam	Mardan/2	1
	341.	55	36	14/8/76	Salma Igbal D/O Muhammad Igbal	Kohat/4	
	342.	55	36	1/1/80	Shahida Bibi D/O Muhammad Hashim Khan	Chitral/3	
	^43. '	55	36	1/2/80	Angel Freum D/O Wasil Khan	Swabl/2	
	344.	55	36	1//2/80	Rohman	Swat/3	
	345,	55	36	15/10/80	Shral Begum D/O-Wahab	Mardan/2	1
	346,	55	36	4/2/81	Samina Akhtar D/O Akhtar Shah	Gadoon Swabi/3	1
	347.	55	36	22/2/81	Safle Bibi D/O igbal *	Nowshera/2	
	348.	55	36.	2/4/81	Sadina (U) (Or famU) (on famU)	Nowshera/2	
	349,	55	36	27/10/81	Blisbnum Bahar D/O All Demsas Khan	D.I Khan/41-	
	30,	55	36	1/12/81	Fugrat Begum D/O Muhammad Amin	Swabl/2	ĺ.
	351.	55	36	1/1/82	Asmat Begum D/O Yar Muhammad	Dir Lower/3	1
	-352.	55	36	2/2/82	Fehmeeds Haz D/O Sher Din	Nowshera/2	
	353.	55	36	3/3/82	Javida D/O Fazall Rahim	Swat/3	1
	354.	55	36	1/12/82	Farkhanda Hayat D/O Hayat Khan	Swabl/2	1
	355.	55	36	1/5/83	Farhana Naz D/O Lai Muhammad	Mkd Agy/3	
	356.	55	36	28/2/84	Almas Malik D/O Muhammad Ilyas	Harlpur/5	2/34
	37.	55	36	20/3/84	Bilqiçş Begum D/O Mir ' Alam Khan	Charsadda/2	

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358.	55	. 36	15/2/85	Hasina D/Q Nlamat Ullah	Mkd Agy/3
359.	55	36	18/7/85	Zubairia Ibadat D/O Syed Ibadat Shah	Abbottabad/
360.	55	36	29/9/85	Lubna Regum D/O Farid Ullah Khan	Mkd Agy/3
361.	55	36	6/3/86	Asma Ghazala D/O Nisar Muhammad	Mkd Agy/3
362.	55	36	1/4/86	Sheraz Bano D/O Hakim Jan	Karak/4
363.	55	36	8/9/86	Rizwana Habib D/O Habib Ullah	D.I Khan/4
364,	55	36	20/12/87	Sundas All D/O Amlad All	Charsadda/2
365.	54	38	9/11/83	Fozla Tabaşşum Afridi D/O Aqil Khan	FR Kohat/1
366.	. 54	38	10/10/86	Nazira Jalal D/O Syed Jalal ud Din	Chitral/3
367,	54	37	18/4/74	Nabila Gul D/O Sabir Khan	Harlpur/5
368.	54	37	1/8/80	Sarwar Parveen D/O Muhammad Sarwar	Chitral/3
369.	54	37	1/4/83	Maria Rabani D/O Ghulam Rabani	Harlpur/5
370,	54	36	1/4/74	Huma Nadir D/O Gazi Jamii Ahmad Abbasi	Nowshera/2
371.	54	36	6/3/80	Fozia D/O Wall Muhammad	Swabl/2
372.	54	36	6/6/80	Najma Anjum D/O Muhammad Karim	Mardan/2
~73.	54	36	1/9/81	Nighat Seema D/O Fateh Muhammad	Mardan/2
374.	54	36	2/9/81	Asma Noreen D/O Fazal Nawab	Nowshera/2
375.	54	38	7/3/82	Sumera Begum D/O Hunar Khan	Nowshera/2
376.	54	36	19/11/82	Sughra Mumtaz D/O Mumtaz Abbas	Abbottabad/
377.	54	36	3/2/83	Naheed Akhtar D/O Muhammad Saleem	Swabi/2
378.	54	36	25/3/84	Tahira Japeen D/O Rahmat	Mansehra/5
379.	54	36	6/4/85	Fareena Halder D/O Halder Zaman	Hairpur/5
30,	-54	36	2/4/87	Hasina Khusrow D/O Nasir Khusrow	Chitral/S
381.	53	36	1/3/80	Uzma Shaheen D/O Fazlur Rehman	Abbottabad/
382.	53	36	28/2/83	Lalla Khalid D/O Bakhtiar Khan	Charsadda/2
383,	53	38	1/4/83	Nabeela Kosar D/O Noor Jamal	Mkd Agy/3
384;	52	36	5/9/83	Noshad Bangash D/O Mohabbat Khan Bangash :	Kurram Agy/1
385.	52	36	5/5/85	Bibi Zainab D/O Muhammad Rashid	Manserha/5

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1 STERES

# BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL

### Service Appeal No:1014/2019

# Mst: Ishrat Ex SST (G) B-16 District Mardan .....Appellant.

### VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others. .....Respondents

### INDEX

> Asstt: Director (Lit: II) E&SE Department, Khyber Pakhtunkhwa, Peshawar.

- .12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 5/4/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 5/4/2019.
- 15 That the appointment letter of the appellant has been declared as fake and bogus by the Respondent Department.
- 16 That the Notification dated 5/4/2019 has correctly been issued by the Respondent Department after observing all the codal formalities.

### ON FACTS.

- 1 That Para-I needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 5/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 25/06/2012 of the appellant is fake & bogus with no cogent record in the Respondents No. 2 & 3 offices.
- 2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct, hence, needs no comments.
- 4 That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 25/06/2012 is baseless & liable to be rejected in favor of the Respondents. (Copy of the Ad; dated 26/01/2009 is Annexure-A).
- 5 That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 25/06/2012 against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 05/04/2019 by the competent authority (Copy of the said Notification dated 05/04/2019 is Annexure-B).

- That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 5/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & where against, no departmental has been filed by the appellant, hence the notification dated 5/4/2019 has got final under the rules against the appellant.
- 7 That Para-7 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 5/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & where against, no departmental has been filed by the appellant, hence the notification dated 5/4/2019 has got final under the rules against the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority.
- 8 That para-8 needs no comments, however, the Respondents further submit on the following grounds inter alia

### ON GROUNDS.

- A <u>Incorrect & not admitted</u>. The appellant has been treated as per law, rules.
   & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case, hence, the stance of the appellant is baseless
   & liable to be rejected.
- B Incorrect & not admitted. The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case having no question of violation of Article 10-A of the constitution of 1973, hence, the stance of the appellant is baseless & liable to be rejected.
- C Incorrect & not admitted. The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as regular inquiry has been conducted vide Notification bearing endst; No.8154-63 dated 4/8/2019 by the competent authority who declared the documents & 1<sup>st</sup> appointment as fake & bogus, hence, the plea of the appellant is without any justification.
- Incorrect & not admitted. The stand of the appellant is without any cogent reason & legal justification on the grounds that his 1<sup>st</sup> appointment Notification dated 25/06/2012 of the appellant have been found fake & bogus by the Respondent Department, hence, his services against the SST (G) B-16 post has been disowned by the competent authority vide Notification date 4/4/2019 under the relevant provisions of law & rules.
- E <u>Incorrect & not admitted</u>. The plea of the appellant is without legal justification & liable to be rejected & the mentioned judgments of the apex courts of law do not apply upon the case of the appellant in the given circumstances of the case.

**Legal**. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated \_\_\_\_/ /2020

Director

E&SE Department Khyber Pakhtunkhwa, Peshawar. (Respondent No: 2)

ecretary E&ŠE Department Khyber Pakhtunkhwa, Peshawar.

(Respondent No: 1)

AFFIDAVIT

I, <u>Hayat Khan Asstt: Director (Litigation-II)</u> E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

Deponent

No. 1
Annezuse :
NUFP PUBLIC SERVICE COMMISSION
2 DERVICE COMMISSION
2- Fort Road Peshawar Cantt: Website: www.cantt:
Website: www.nwfppsc.gov.pk
nuw.nwippsc.gov.pk
DATERTISEMENT No. 01 / 2009. Dated: 26-01-2009
$\frac{20-01-2009}{20-01-2009}$
<u> </u>
Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A applications without supporting documents required. Incomplete applications is the rejected with
Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A iomicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and inpplications without supporting documents required to prove the claim of the candidates in the support of the candidates.
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applications without supporting documents required to prove the claim of the candidates shall
AGRICHIT
MICOLIURE LIVESTOCK & CO OPEN
(S.No. 01) One (01) Post of
(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev; <u>OUALIFICATION: MSC.</u>
Olla IPIcon
<u>OUALIFICATION:</u> M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under
"4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule.
Which the Veen strong to the subject group and the subject group
AGE LIMIT: 21 to 27
AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes.
S.No. 02) Two (2) Device the second s
<u>QUALIFICATION:</u> M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc). from a recognized University and
"4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule. It
programme in the subject relating to the subject groups as specified in scheduleII to which the Vacancy occurs.
AGE LIMITATION and the subject groups as specified in schedule -11 to
ACE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY, MARK
Male.
Merit Zone-1
CHIEF ENGINEER WORKS
CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.
No. 03) Five (05) Post in
City Posts of Data Entry Operator
Science from the recognized Institute (ii) Speed of Ten thousand how
Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.
AGE LIMIT: 18 to 30 years. <u>PAY SCALE</u> : BPS-11. <u>ELIGIBILITY</u> : Both Sexes. Zone-1
ALLOCATION: ALLOCATION:
Zone-1 Zone-2 Zone-3 Zone-3
01 Zone-3 Zone-4 Zone-4
<u>DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR &amp;</u> <u>TECHNICAL EDUCATION DEPARTMENT</u>
TECHNICH STRIES COMMERCE MINERAL DEV: LABOUR
<u>TECHNICAL EDUCATION DEPARTMENT</u>
QUALIFICATION Internspector Mines
University and (i) 11 Bachelor Degree in Mining Engine
the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923
Government Mining Industries registered under the Mines Act, 1923. <u>AGE LIMIT:</u> 21 to 33 years, PAY SCALE: DB2 Act, 1923.
$11 \times 10^{-1}$ = 1 10 33 VCars $13 \times 10^{-1}$ = 1.00, 1925.
ALLOCATION: NOTE: In case of non- availability of parallelity: Male.
ALLOCATION: NOTE: In case of non- availability of candidates possessing the

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area islons of the rules for the time being in force. N<u>GTÈ:</u>

attier in History or Political Science provided the other required subjects has studied at 3.A level. The other requirement of teaching degree will, however, remain intact. For Biology: 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level ...

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Female.

Subject		
Islamiyat	No. of Posts	Allocation
5. Pak: Study	02	Merit Quota
History-Cum-Civics	03	Merit Quota
S. Economics		Merit Quota
9. English	. 02	Merit Quota
10. Statistics	02	Merit Quota
I. Maths	02	Merit Quota
2. Biology	: 02	Merit Quota
13. Chemistry	. 02 .	Merit Quota
14. Physics	02	Merit Quota
	. 02.	Merit Quota

(S.No. 52)

Sixteen Hundred Eighty One (1681) Posts of Male SETs Science & Arts) (with out graduaty and pension):

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. ACE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION:

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	Zone-1 Zo	ne-2 Zona 3	1 1	
420		Inc-2 Zone-3	Zonc-4	Zone-5
420	280	01	·	
	200 2	21 280	1 210 1	210
				210 1

#### (S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension): .

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University. AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION: Merit.

(S.No. 54) Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both Science & Aris) (with out graduaty and pension).

OUALIFICATION: For\_Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University. For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of

the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A. or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University: AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male. ALLOCATION: Merit.

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Both Science & Arts) (with out graduaty and nension)	
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(Both Science & Arts) (with out graduaty and pension). <u>OUALIFICATION:</u> For Secondary School Trad	
recognized University. For Secondary Set	
the Subjects of Physics of Physics of the State of the Subjects of Physics of the State of the S	
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics – A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University, AGE LIMIT: 21 to 40 years. <u>PAY SCALE</u> : BPS-16 ELIGIBITITY, F	•
AGE LIMIT: 21 to 40	•
AGE LIMIT: 21 to 40 years. <u>PAY SCALE</u> : BPS-16 <u>ELIGIBILITY</u> : Female.	•
243 162 Zone-3 Zone-4 Zone-5	
	·
5 (C) (Fiventy One (21) D. ( ) = (	•.
graduaty and pension).	1
	i
Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University. For Secondary School Territ.	
recognized University	
the Secondary School Teacher (Science) (i) BSe Secondary School Teacher	
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics – A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized Univ	;
<u>PAY SCALE</u> : BPS-16 <u>ELIGIBILITY</u> : Female. <u>ALLOCATION</u> : Merit.	
(S.No. 57) Fifty One (51) B-	•
(I.E) Battagram, Manschra, Shangla, Kohistan, Abbottabad, (with out Ollat (Florman).	
QUALIFICATION	
<u>QUALIFICATION:</u> For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.	
For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics B and (i) Physic, Chemistry, Zoology, Botany, and Mathematics	·
the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics – A or- Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized by the	•
AGE LIMIT: 21 to 40 years. <u>PAY SCALE</u> : BPS-16 <u>ELIGIBILITY</u> : Female.	
<u>ABBOCATION:</u> Merit.	
TECIDICA	1
TECHNICAL EDUATION AND MAN POWER TRAINING	1
DEPARTMENT.	
Add I married wards / a married and in	
(S.No. 58) Two $(02)$ Posts of Amint I	
(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of	-
A OVALIGICATION. () PL DUCE INSULUTES.	
with three year teaching and in the relevant subject from a recognized University	ļ
The first instance of the Could metric the first and the Courses of Courses o	1
Ma rears experience of teaching and the oniversity in the relevant subject with Five	
Govt: Commercial Institute/ Govt: Commerce College.	
AGE LIMIT: 25 to 40 years. <u>PAY SCALE</u> : BPS-18. <u>ELIGIBILITY</u> : Male.	
(S.No. 59) (NVO (07) Post-	
Govt: College of Technology & Govt: Polytechnic Institure.	
Insulute with one we are compared it is the second se	
	Ì
with five years teaching/ professional experience in the recognized University/ Institute	
with five years teaching/ professional experience in the relevant subject as a difference of the relevant subject as such: OR (c)	i

(S.No. 66)   Ten (10	<u>) P</u> osts of Male office Assistant.

•	<u>OUALIFICATION:</u> Bachelor degree from recognized University. <u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Male.					
Í	ALLOCATION: Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	
	02	02	02	02	· 02	

(S.No. 67)	One (01) Post of Female office Assistant.	
1	OUALIFICATION: Bachelor degree from recognized University.	
	AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.	
	ALLOCATION: Merit.	1

# CORRIGENDUM

The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.

2.

(i)

(ii)

(iii)

(iv)

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The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

# GENERAL CONDITIONS.

Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Goyt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District , Shangla, Gadoon Area in Swabi, Backward areas of Manschra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Goyt Servants, general or disabled candidates, whichever is relevant and applicable to them.

Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution TEulist candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.

ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.

The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as wellas disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.



### NOTIFICATION

1 WHERE AS: one Mst. Shabana Bibi D/O Abdus Sattar who herself appointed/acjusted as SST (G) in GGMS Inayat Killi District Bajaur now working in dette side vide Notification No. 7223-29/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 27/10/2012 and No. 12414-17/A-1/Apptt: of SST (General) (PSC)2012 dated 02/11/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.

DIRECTORATE OF ELEMENTARY . SECONDARY EDUCATION KHYBER PAKHTUNKHWA

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- 2 AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
  - AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
  - 4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Shabana Bibi D/O Abdus Sattar, having no legal status of the said appointment/adjustment order,
  - 5 NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. 7223-29/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 27/10/2012 and No. 12414-17/A-1/Appli: of SST (General) (PSC)2012 dated 02/11/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Shabana Bibi D/O Abdus Sattar in the interest of Public Service.

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Endst: No.

833-37

1 Deputy Commissioner, Tribal District Bajaur with the request to take legal action.

2019

- 2 District Education Officer Tribal District Bajaur with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
- 3. District Account Officer Tribal District Bajaur to co-operate in the matter.
- PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
- 5. PA to Director Elementary and Secondary Education Knyber Pakhtunkhwa.

ATTER

05 Deputy Director (Estab) Merged Districts

Those employees who were appointed on contract basis and have subsequently been regularized in service, under the KP Employees (Regularization of Services) Act, 2009. **(Category-1 Appeals)** 

i. Service Appeal No.958/2019 (Ishfaq Ahmad)

ii.

ii.

- Regularization notification dated: 11.02.2010 is available at Page No.18 Service Appeal No.1009/2019 (Ishtiaq Ahmad)
- Regularization notification dated: 11.02.2010 is available at Page No.18 iii. Service Appeal No.1012/2019 (Muhammad Iqbal)
- Regularization notification dated: 11.02.2010 is available at Page No.16 iv. Service Appeal No.1024/2019 (Muhammad Sohail)
  - Regularization notification dated: 11.02.2010 is available at Page No.17
- Appellants of Category-III Appeals, who were appointed as SST (BPS-16), on the recommendations of the KP Public Service Commission and subsequently been promoted to the rank of SS (BPS-17)
   Service Appeal No.1027/2019 (Mst. Sarwat Jehan) Promoted as SS (BS-17), vide Notification dated: 04.05.2018 (Annexure A)
  - Service Appeal No.1033/2019 (Mst. Seema Mujahid)

Promoted as SS (BS-17), vide Notification dated: 03.07.2018 (Annexure B)

Submitted by:

**Amin ur Rehman Yusufzai** Advocate Peshawar



### FATA SECRETARIAT (SOCIAL SECTORS DEPARTMENT) WARSAK ROAD PESHAWAR Dated Peshawar the May 04, 2018

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SA NO: 102-7/19 s | Ne-6 Back Page)

# NOTIFICATION

No.SO/Edu/SSD/FATA/ /9-cc - 19 c S Consequent upon their promotion and placement of their services at the disposal of FATA Secretariat vide Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Notification No. SO(S/F) E & SED/ 4-16/2018/DPC/Promotion/ /B-16 to BS-17 dated 13/4/2018, the Competent Authority is pleased to adjust the following female officers promoted from the post of SST BS-16 to the post of Subject Specialist BS-17 in the Schools / Stations mentioned against their names below in the interest of public service.

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			Remarks
S#	Name of Officer with	Promoted as	Remarke
	Designation and Present	· _	
	Place of Posting		Posted against the vacant
1	Mst. Gul Pari, SST (BS-16),	Subject Specialist in	post of Subject Specialist
	Govt. Girls Middle School	Urđu (BS-17).	
	Wali Khel Bara, Khyber		
1 1 1	Agency.		at Govt. Girls Higher
· · ·	, , , , , , , , , , , , , , , , , , , ,		Secondary School Kalanga
			Bara Khyber Agency.
2	Mst. Tasleem Akhtar, SST	Subject Specialist in	
. 2	(BS-16), Govt. Girls Middle	Urdu (BS-17).	post of Headmistress
-	School Sadiq Abad, Bajaur	•	(BS-17) at Govt. Girls High
			School Inayat Killi Bajaur
1.	Agency.		Agency.
	l Verent SST	Subject Specialist	Posted against the vacant
3	Mst. Samina Yousaf, SST		post of Subject Specialist
	(BS-16), Govt Girls High School Subhan Khwar		in Islamiyat (BS-17) -at
	001100,	,	Govt. Girls Higher
	Mohmand Agency.		Ghallanai Mohmand
		· .	Agency.
·		T Subject ' Specialis	
4	Mst. Shaheen Naz, SS		post of Headmistress
	(BS-16), Govt. Girls Middl	1	(BS-17) at Govt. Girls High
Į	School, Ghami Ko	or i i i i i i i i i i i i i i i i i i i	School Illam Kor Mohmand
·	Mohmand Agency.		Agency.
· ']		ls Subject Speciali	
5	Mst. Noor Nabia, Govt. Gir		post of Subject Specialist
•	High School Subha	an in Pashto (BS-17).	in History cum Civics
•	Khuwar Mohmand Agency	• .	(BS-17) at Govt. Girls
-			Higher Secondary School
	· · ·		Officialities
			Agency.
• [			

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Page 1 of 2

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6	<u> </u>	Mst. Zubaida, SST (BS-16),	Subject Specialist	Destad
1		Govt. Girls High School	in Poshta (PC 17)	
÷.		Sharbatai Bajaur Agency.	Fashto (BS-17).	post of Headmistress
-		- Second Cajadi Agency.		(BS-17) at Govt. Girls High
				School Sharbatai Bajaur
7		Mst. Shazia Bibi, SST		Agency.
			Subject Specialist	Posted against the vacant
14.	, i	(BS-16), Govt Girls High	in History / Civics	post of Subject Specialist
		School Waris Khan Killi FR	(BS-17).	(BS-17) at Govt. Girls
1		Peshawar.		Higher Secondary School
. 			0	Kalanga Bara Khyber
X	:			Agency.
1.1			• •	
.1/8	Л	Mst. Sarwat Jehan, SST	Subject Specialist	Posted against the vacant
		(BS-16), Govt. Giris High	in Economics	post of Subject Specialist
		School Sra Sha Mohmand	(BS-17).	(BS-17) at Govt. Girls
• .	•	Agency	. ,	Higher Secondary School
1	. •			
				Landi Kotal Khyber Agency
i.				Agency.
9		Mst. Salya Wazir, SST	Subject Specialist	Posted against the
		(BS-16), Govt. Gilrs Middle	in Biology (BS-17).	Posted against the vacant
Ì		School Said Rehman Jani		post of Subject Specialist
. 1		Khel FR Bannu,	· .	(BS-17) 'at Govt. Girls
÷.,				Higher Secondary School
т. Т.				Landi Kotal Khyber
1	í		· · · ·	Agency.
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2. The terms & conditions will remain the same as notified in the mentioned above notification.

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3. No.TA / DA allowed.

Secretary Social Sectors Department FATA

# Copy of the above is forwarded to the:

1. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa.

- . 2. AGPR (Sub Office) Peshawar.
- 3. Director Elementary & Secondary Education Department Khyber Pakhtunkhwa.
- 4. Director Education FATA.
- 5. Agency Education Officers concerned.
- 6., Principals concerned.
- 7. Agency / District Accounts Officers Concerned.
- 8. Officers Concerned.
- 9. PS to Secretary Social Sectors Department FATA.

Alm Abdul Manan

Section Officer Education

# KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

and the second second second second second second second second second second second second second second second

No. 242 /ST

Dated \_\_\_\_\_ 02 / 2021

То

The Director E&SE Government of Khyber Pakhtunkhwa, Peshawar.

Subject: - JUDGMENT IN APPEAL NO. 1014/2019, MST. ISHRAT & OTHERS.

I am directed to forward herewith a certified copy of Judgement dated 20.01.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR, KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Annex (B) C = II5/1x0-276 PageNo10 GOVERNMENT OF KHYBER PAKHTUNKHWA **ELEMENTARY & SECONDARY EDUCATION DEPARTMENT** Dated Peshawar the 14-11-2017

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## **NOTIFICATION**

No.SO(PE)/2-6/DPCMeeting/SST-SS (03-10-2017): On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Three Hundred and Fifty Five (355) Female SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

1.	English			- <u>+</u>
S#	Senty: list No.		Proposed place of Posting	Remarks
1.	523	Riasat M.A M.ed GGHS Panr	SS English BS-17 GGHSS Gwalerai Swat	Against the vacant post
2.	715	Jannat Zahir M.A M.Ed GGHS Guligram	SS English BS-17 GGHSS No. 2 Mangora	Against the vacant post
3.	956	Fazilat Ayub MA,M.ED GGHSS NO.02 DIKhan	SS English BS-17 GGHSS No. 9 DIKhan	Against the vacant post
4.	1143	Nazneen Akram GGHS No.4 Bannu City	SS English BS-17 GGHSS Kotka Bilawal Khan Bannu	Against the vacant post
5.	1179	Mst. Zain-ul-Haram SST (Sc) GGHS Kundi Sherawal Haripur		Against the vacant post
6.	1182	Mst. Hussan Taj SST GGMS Amanullah Jan Kot NWA	ΓΑΤΑ	post
7.	1230	Rizwana Gul MA/M.Ed GGHS Sangar Mansehra	SS English BS-17 GGHSS Oghi Mansehra	Against the vacant post
8.	1238	Seema Safdar M.Phil B.Ed GGHSS Kabal	SS English BS-17 GGHSS Manglawar Swat	Against the vacant post
9.	1260	Naheed Khalil M.A B.EdeGGHS Aboha Swat	SS English BS-17 GGHSS Batkheta Matakand	Against the vacant post
10.	1274	Saima MA English GGHSS, Dak Ismail Khel	SS English BS-17 GGHSS Dak Ismail Khel Nowshera	Against the vacant post
11.	1282	Sadia Saleem MA GGHS Maho Dheri Mardan	SS English BS-17 GGHSS Ghalladher Mardan	Against the vacant post
12.	1287	Atia Naz GGMS Jica Model School Mardan	SS English BS-17 GGHSS Rustam Khel Mardan	Against the vacant post
13.	1298	Nusrat Jabeen/ MA,LLB,M.Ed GGMS Essa Khel	SS English BS-17 GGHSS B.S.D. Peshawar	Against the vacant post
14.	1301	Shafiqua Bibi MA/M.Ed GGHS Mohayian Mansehra	SS English BS-17 GGHSS Shergarh Mansehra	Against the vacant post
15.	1316	Mst. Gul Nasreen SST (G) GGHSS Behzadi Chakar Kot Kohat	SS English BS-17 GGHSS Lachi Kohat	Against the vacant post
16.	1326	Syeda Ume Salma SST GGHS Kurez Orakzai Agency	Services placed at the disposal of FATA	Against the vacant post
17.	1329	Shehnaz Anjum MA, M.Ed GGMS Kazim Killi Mardan	SS English BS-17 GGHSS Takhtbhai Mardan	Against the vacant
18.	1390	Javeria Arshad MA/MED CGMGHS Haripur	SS English BS-17 GGHSS Beer Haripur	Against the vacant post
19.	1391	Sadia Masroor Naqvi MA / BED GGHS Sarai Namat Khan	SS English BS-17 GGHSS Baja Swabi	Against the vacant post
20.	[413	Sumaira Iqbal MA/M.Ed GGCMS No.1 Mansehra	SS English BS-17 GGHSS Lessan Nawab Mansehra	Against the vacant post
21.	1423	Mst. Uzma Sardar SST (G) GGHS Kharmatoo Kohat	SS English BS-17 GGHSS Togh Bala Kohat	Against the vacant post
22.	1452	Lubna Jabeen GGMS Kala Khel Masti Khan Bannu	SS English BS-17 GGHSS Qamarzaman Mandew Bannu	Against the vacant post
23.	1453	Mst. Meher Taj SST GGHS Sabir Abad Karak	SS English BS-17 GGHSS Esak Chuntral Karak	Against the vacant post
	 		SS English BS-17 GGHSS Sari Kot	

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	r	Shahana Gul GGHS No.4	SS English BS-17 GGHSS	Against the vacant
<u>`</u> 26.	1549	Shahana Gul GGHS No.4 Bannu City Bibi Fatima, MA.MEd GGHS	SS English BS-17 GGHSS Mumbathi Barakzai Bannu SS English BS-17 GGHSS Tikri	Against the vacant
27.	1558	Bibi Fatima, MA.MEd OOHS Battagram Farzana Sanam MA/B.Ed	Kirarhy Battagram	post Against the vacant
28.	1567	GGMS Ichrian Mansehra	Mansehra SS English BS-17 GGHSS Noordi	post Against the vacant
29.	1574	Noreen Ghaffar SST MA/MED GGHS Kharian Mst. Gul Naz SST GGHS	Haripur Services placed at the disposal of	post
30.	1576	Kotkha Mirajuddin FR Bannu Ayesha M.A (M.Ed GGHS	FATA SS English BS-17 GGHSS Kala	post
31.	1597	No.1 Mingora Saima Noreen SST Sc GGHSS	Killi Swat SS English BS-17 GGHSS	post Against the vacant
32.	1604	Sherwan A/Abad Salma Sami/Ph.D Edu: GGMS	Sherwan Abbottabad SS English BS-17 GGHSS	post Against the vacant
33.	1623	Shahi Bala Peshawar Salma Shaheen GGMS Rasool	Jogiwara Peshawar SS English BS-17 GGHSS Domail	post Against the vacant
34.	1650	Khan Chak Dadan Bannu Shaista Malik MA/M.Phil	Bannu	post
35.	1651	/M.Ed GGHS Chitta Batta Mansehra	SS English BS-17 GGHSS Tarawara Mansehra	post
36.	1661	Rana Karam MA M.Ed GGHS Fazal Abab Kan	SS English BS-17 GGHSS No.2 Saidu Sharif Swat	Against the vacant post
37.	1684	Zuhra bibi MA/ M.Ed GGHSS Balakot Mansehra	SS English BS-17 GGHSS Balakot Mansehra	post
38.	1709	Asma Qazi MA (Eng) MED GGHS Mirpur	SS English BS-17 GGHSS Rich Bhen Abbottabad	post
39.	1727	Kaneez Fatima SST GGMS Adil Sipra DIKhan	SS English BS-17 GGHSS Fazle Rahim Colony DI Khan	post
40.	1760	Saima Noreen MA/B.Ed GGHS Mangloor Mansehra	SS English BS-17 GGHSS Oghi Mansehra	post
41.	1768	Shin Swat	SS English BS-17 GGHSS Matta Swat SS English BS-17 GGHSS	post
42.	1774	Shabnam Bibi GGHSS Dheri Saidan Bannu Faiza Tabasum MA/M.Ed	Ghoriwala Bannu	post
43.	1798	GCMS Jaba Sheikhabad Mansehra	Abbottabad	post
44.	1811	Shazia Khalid M.A; M.Ed GGHS Chail Shagai	Charbagh Swat	post
45.	1812	Sonia Sultana MA M.Ed GGHS Fatehpur Swat	Fatehpur Swat	post
46.	1821	Zebi Shahnaz MA English GGHSS, Khairabad	Abad Nowshera	post
47.	1822	Irfana Rasool MA,M.ED GGHS Kacha Mali Khel DIKhan	SS English BS-17 GGHSS Bilot Sharif DIKhan	Against the vacant post
48.	1825	BiBi Fatima, SST (Gen),GGHS No.1, Sarai Nourang Lakki	Shukurullah Bannu	post
49.	1873	Amina Begum M.Ed GGHSS Murad Pur	SS English BS-17 GGHSS Ghari Phulgran Abbottabad	post
50.	2056	Aisha Qazi SST GGHS Alizai Peshawar	SS English BS-17 GGHSS Khyber Colony Peshawar	Against the vacant post
51.	2327	Mst. Uzma Karim D.O. Muhammad Karim GGHS Ahigaro Dheri Swat	NS Lughes BS 17 GG1188 Kabal Swat	Against the vacant post
52.	2369	Mst. Faseeha Malik SST GGCMS Haripur	Munara Swabi	post
53.	2413	Mst. Robina Khan GGHSS Manki Sharif Nowshera	Sharif Nowshera	post
54.	2417	Mst. Huma Rehman SST GGHS Kotha Swabi	SS English BS-17 GGHSS Kalabat Swabi	Against the vacant post

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	2571	Mst. Shukria Bibi SST GGMS Moughaldeh Chitral	SS English BS-17 GGHSS Shiaqotake Chitral	Against the vacant post
59.	2677	Mst. Shamaila SST GGHS Jisgran Payeen Mansehra	SS English BS-17 GGHSS No.2 Mansehra	Against the vacant post
60.	2726	Mst. Saira Bibi SST GGHS Sirya Haripur	SS English BS-17 GGHSS Pabbaini Swabi	Against the vacant post
61.	2730	Bushra Ishaq GGCMS Hisar Baba Malakand	SS English BS-17 GGHSS Koper Malakand	Against the vacant post
62.	2735	Mehnaz Hassan SST GGHSS Panyala DIK	SS English BS-17 GGHSS Panyala DIKhan	Against the vacant post
63.	2863	Mst. Zubaida Razaq SST GGHSS Chamkani Peshawar	SS English BS-17 GGHSS Chamkani Peshawar	Against the vacant post
64.	2866	Mst. Shazia Begum SST GGHS Sarwar Shah Kothe Gohati Swabi	SS English BS-17 GGHSS Dagai Swabi	Against the vacant post
65.	2887	Mst. Sadia Iqbal SST GGHS Talokar Haripur	SS English BS-17 GGHSS Hattar Haripur	Against the vacant post
66.	2955	Sobia Haq GGHS Kaddi Swabi	SS English BS-17 GGHSS Kaddi Swabi	Against the vacant post
67.	2994	Mst. Nusrat Jabeen SST GGCMS Chitral	SS English BS-17 GGHSS Warijum Chitral	Against the vacant post
68.	3200-A	Mst. Nuzhat Shaheen SST GGHS Dhodial A/Abad	SS English BS-17 GGHSS Hajia Gali Abbottabad	Against the vacant post

S#	Urdu Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
69.	214	Begum Khatoon/MA Med GGHSS University Town	SS Urdu BS-17 GGHSS Tarnab Farm Peshawar	Against the vacant post
70.	215	Mst. Salma Begum SST (G) GGHSS No.2 Peshawar Cantt	Peshawar Cantt	Vice S.No. 356
71.	296	Mst. Rashida Younis SST GGHS Gudwalian Haripur	SS Urdu BS-17 GGHSS Seri Kot Haripur	Against the vacant post
72.	381	Mst. Qamar-un-Nisa SST GGHSS BSD Peshawar	SS Urdu BS-17 GGHSS BSD Peshawar	Against the vacant post
73.	383	Mst. Shamim Akhtar SST GGMS Danin Chitral	SS Urdu BS-17 GGHSS Sheyaqotak Chitral	Against the vacant
74.	407	Nafces Fatima,SST BA BEd GGHSS Hayatabad Peshawar	SS Urdu BS-17 GGHSS Badber Peshawar	Against the vacant post
75.	451	Jehan Aftab M.A B.Ed GGHSS Gwalarai	SS Urdu BS-17 GGHSS Gwalarai Swat	Against the vacant post
76.	454	Nizakat Wahab MA, B.ED GGMS Adam Dehrai	SS Urdu BS-17 GGHSS Kityari Dir Lower	Against the vacant post
77.	464	Bibi Sajida SST (Sc) GGHSS Nishtarabad Peshawar	SS Urdu BS-17 GGHSS Wadpaga Peshawar	Against the vacant post
78.	466	Farah Deeba GGHS Dargai Mkd	SS Urdu BS-17 GGHSS Sakhakot Malakand	Against the vacant post
79.	468	Robina Safi/MA M.Ed GGHSS Khyber Colony	SS Urdu BS-17 GGHSS Khyber Colony Peshawar	Against the vacant post
80.	490	Mst. Tahira Bibi SST GGHS Dara Ramora Dir Lower	SS Urdu BS-17 GGHSS Shawa Dir Lower	Against the vacant post
81.	512	Shahida Taskeen Lodhi, SST M.A GGHS Mirpur	SS Urdu BS-17 GGHSS Sherwan Abbottabad	Against the vacant
82.	519	Ghazala Noreen GGHS maneri Swabi	SS Urdu BS-17 GGHSS Gulshan Abad Swabi	Against the vacant
83.	520	Mst. Abida Shaheen SST GGMS Simlan Negar Haripur	SS Urdu BS-17 GGHSS Noordi Haripur	Against the vacant post
84.	522	Shabnam Alam M.A B.,Ed GGHS Ghalagay	SS Urdu BS-17 GGHSS No. 1 Saidu Sharif Swat	Against the vacant post
85.	526	Ruqia GGHS Tordher Swabi	SS Urdu BS-17 GGHSS Shahmansoor Swabi	Against the vacant
86.	531	Mst. Naila Parveen SST GGHSS Matta Swat	SS Urdu BS-17 GGHSS Kabal Swat	Against the vacant post

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ſ	89.	547	Ruqqiya-tu-zuhra SST/AAEO Office FR Peshawar	Services placed at the disposal of FATA	Against the vacant post
	90.	554	Mst. Khalida Jan SST GGMS Payoo Noor Jamrud	Services placed at the disposal of FATA	
ſ	91.	555	Mst. Safia Begum SST GGMS Wazir Killay Moh: Agency	Services placed at the disposal of FATA	Against the vacant post
	92.	567	Robina SST GGHS Karigar Garhi Bara Khyber Agency	Services placed at the disposal of FATA	Against the vacant post
	93.	582	Mst. Alia Tammana SST (G) GGMS Tariqabad Charsadda	SS Urdu BS-17 GGHSS Utmanzai Charsadda	Against the vacant post
	94.	580	Saima Khadim/M.A. M.Ed, M.Phil GGHSS Jogiwara	SS Urdu BS-17 GGHSS Jogiwara Peshawar	Against the vacant post
	95.	610	Shagufta Nazir MA, M.Ed GGCMSS No.1 A/Abad	SS Urdu BS-17 GGHSS Lora Abbottabad	Against the vacant post
	96.	613	FAIZA GGHS MANERI BALA Swabi	SS Urdu BS-17 GGHSS Kalu Khan Swabi	Against the vacant post
	97.	619	Mst. Shabana Bibi GGHSS BSD Peshawar	SS Urdu BS-17 GGHSS Mathra Peshawar	Against the vacant post
	98.	626	Mst. Jehanzeb Ghani SST GGMS Ahmad Khel Peshawar	SS Urdu BS-17 GGHSS Chamkani Peshawar	Against the vacant post
	99.	647	Nazneen Shah MA Urdu GGMS, Khattak Building NSR	SS Urdu BS-17 GGHSS Badrashi Nowshera	Against the vacant post
	100.	668	Razia Sultana GGHS Qudrat Killi Mardan	SS Urdu BS-17 GGHSS No.1 Mardan	Against the vacant post
	101.	669	Bibi Aisha M.A M.Ed GGHSS Matta Swat	SS Urdu BS-17 GGHSS Matta Swat	Against the vacant post
	i02.	670	Samreen Rabia GGCMS No.1 DIKhan	SS Urdu BS-17 GGHSS Din Pur DIKhan	Against the vacant post
	103.	674	Nasreen Begum GGHSS Koper Mkd	SS Urdu BS-17 GGHSS Koper Malakand	Against the vacant post
	104.	684	TASLEEM NOOR GGHS HATHIAN Mardan	SS Urdu BS-17 GGHSS Hathyan Mardan	Against the vacant post
	105.	694	Seema Afridi/MA Med GCMGHS Nauthia	SS Urdu BS-17 GGHSS Comprehensive Peshawar	Against the vacant post
	106.	705	Mst. Rozia Bashir SST/Inst: PITE Peshawar	SS Urdu BS-17 GGHSS Sufaid Sang Peshawar	Against the vacant post
	107.	706	Ruqia Khatoon MA/MED GGJMS Vijjian Haripur	SS Urdu BS-17 GGHSS Khanpur Haripur	Against the vacant
	108.	711	Mumtaz Begum GGMS Mander Killa Karak	SS Urdu BS-17 GGHSS No. 1 Karak	Against the vacant
	109.	712	Razia Khattak GGHS Palosa	SS Urdu BS-17 GGHSS Esak Chontra Karak	Against the vacant post
	110.	713	Rukhsana Jabeen GGHS Gandaf Swabi	SS Urdu BS-17 GGHSS Pabaini Swabi	Against the vacant

S#	Islamiya Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
111.	186	Rukhsana Begum MA /BED GGHS No.2 Haripur	SS Islamiyat BS-17 GGHSS Panian Haripur	Against the vacant post
112.	338	Humaira Bibi MA/MED GGHS No.2 Haripur	SS Islamiyat BS-17 GGHSS Noordi Haripur	Against the vacant post
113.	368	Mst. Nasima Shaheen SST GGHS Prova DIKhan	SS Islamiyat BS-17 GGHSS Prova DIKhan	Vice S. No. 357
114.	458	Altaf Jamalullah M.A/ B.Ed GGHSS Panjtar Bunir	SS Islamiyat BS-17 GGHSS Panjtar Bunir	Against the vacant post
115.	462	Naheed Mubarak MA/MED GGHS Mir Pur.	SS BS-17 GGHSS Noordi Haripur	Against the vacant post
116.	465	Naheed Sultana MA, B.ED GGHS Timergara	SS (Islamiyst) BS-17 GGHSS Koto Dir Lower	Against the vacant post
117.	485	Mst. Ghazala Yasmin SST (G) GGHSS Sakhakot Malakand	SS (Islamiyat) BS-17 GGHSS Sakhakot Malakand	Against the vacant post

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•	· .	498	Sadaqat MA, M.Ed GGMS Baghdada Mardan	Garhi Mardan.	Against the vacan
`-	121.	502	Shahi Zeenat M.A; M.Ed GGHSS Totanobandi Swat	SS Islamiyat BS-17 GGHSS Totanobandi Swat	Against the vacan post
	122.	506	Mst. Nusrat Jabeen SST GGMS Maira Kachori Peshawar	SS Islamiyat BS-17 GGHSS Azakhel Payan Nowshera	Against the vacan post
	123.	509	Shad Bibi M.A;M.Ed GGHS Khwazakhela	SS Islamiyat BS-17 GGHSS Fatehpur Swat	Against the vacan post
	124.	513	Fozia Begum MA GGHS Maho Dheri Mardan	SS (Islamiyat) BS-17 GGHSS Ghalladher Mardan	Against the vacan post
	125.	516	Mst. Nargis SST (Sc) GGHS Par Hoti Mardan	SS Islamiyat BS-17 GGHSS Par Hoti Mardan	Against the vacan post
	126.	518	Shabnam Saddiq M.A.M.Ed GGHS No.1 Mingora	SS Islamiyat BS-17 GGHSS Odigram Swat	Against the vacan post
	127.	525	Ghazala Shabnam GGHS No.1 Mardan	SS Islamiyat BS-17 GGHSS Kati Garhi Mardan	Against the vacan
	128.	529	Falak Naz GGHSS Shahbaz Garhi Mardan	SS Islamiyat BS-17 GGHSS Cham Dheri Mardan	Against the vacan post
	129.	538	Yasmeen Bibi GGHS Qaldara Mkd	SS (Islamiyat) BS-17 GGHSS Palonow Malakand	Against the vacan post
	130.	561	Mst. Zahida Bibi AAEO (F) FR DIKhan	Services placed at the disposal of FATA	Against the vacan post
ſ	131.	568	Nosheen Aziz/MA Bed GGHSS Chamkanni	SS Islamiyat BS-17 GGHSS Aza Khel Payan Nowshera	Against the vacan post
	132.	575	Shahida Parveen GGCMS Charagh Din Killi Mardan	SS Islamiyat BS-17 GGHSS Qasmi Mardan	Against the vacan post
	133.	593	Kosar Jabeen MA/M.Ed GGHS Baidra	SS Islamiyat BS-17 GGHSS No.2 Mansehra	Against the vacan post

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S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
134.	84	Mst. Rohida SST MA BEd GGHS Comp: Peshawar	SS Pashto BS-17 GGHSS Comp: Peshawar	Against the vacant post
135.	220	Mst. Tafzeel Begum SST GGHSS Shabqadar Fort Charsadda	SS Pashto BS-17 GGHSS Shabqadar Fort Charsadda	Against the vacant post
136.	493	Bibi Sadia M.A M.Ed GGHS Aboha Swat	SS Pashto BS-17 GGHSS Odigram	Against the vacant post
137.	503	Mst. Muleeda Rahim SST GGMS Sorana Mkd	SS Pashto BS-17 GGHSS Agra Malakand	Against the vacant post
138.	524	Humera Naz GGMS Zoormandai Mkd	SS Pashto BS-17 GGHSS Koper Malakand	Against the vacant post
139.	528	Nizakat Ambar M.A MB.Ed GGHS Shaheen Abad Swat	SS Pashto BS-17 GGHSS No.2 Saidu Sharif Swat	Against the vacant post
140.	678	Sardar Jehan M.A;M.Ed GGHS Panr Swat	SS Pashto BS-17 GGHSS No.1 Saidu Sharif Swat	Against the vacant post
141.	709	Miss Zahida Begum SST (G) GGMS Mani Khela	SS Pashto BS-17 GGHSS Harichand Charsadda	Against the vacant
142.	722	Miss Misbahia SST (G) GGHSS Dhakki	SS Pashto BS-17 GGHSS Dhakki Charsadda	Against the vacant post
143.	732	Mst. Farzana Begum SST GGHS Ali Jan Killay Charsadda	SS Pashto BS-17 GGHSS Ziam Charsadda	Against the vacant post
144.	735	Miss Naeema Begum SST (G) GGHSS Umerzai Chd	SS Pashto BS-17 GGHSS Sherpao Charsadda	Against the vacant post
145.	769	Aqleem Jehan MA, M.Ed GGHS Shekhano Banda Mardan	SS Pashto BS-17 GGHSS Katlang Mardan	Against the vacant post
146.	806	Azra Jabeen GGHS Marghuz Swabi	SS Pashto BS-17 GGHSS Gar Munara Swabi	Against the vacant post
147.	816	Surraya Begum MA, M.Ed	SS Pashto BS-17 GGHSS Parkho	

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•	150.	923	0	SS Pashto BS-17 GGHSS Toru	•	vacant
			Sharqi Hoti Mardan	Mardan	post	
	151.	924	Nusrat Jabeen GGHS Palonow Mkd	Malakand	Against the post	
	152.	925	Mst. Najma SST GGHS Waris Khan Killi FR Peshawar	Services placed at the disposal of $FATA$	Against the post	vacant
	153.	929	Miss Safia Begum SST (G) GGHSS Utmanzai Chd	SS Pashto BS-17 GGHSS Utmanzai Charsadda	Against the post	vacant
	154.	934	Jamila Bibi MA , B.ED GGHS Ramora Dir Lower		Against the post	vacant
-	155.	936	Mst. Farhat Ara SST GGHSS Behzadi Chakar Kot Kohat	SS Pashto BS-17 GGHSS Bezadi Chakar Kot Kohat	Against the post	vacant
-	156.	946	Bakht Shahida MA B.ED		Against the post	vacant
-	157.	947	GGHS Mian Brangola Mst. Nihayat Sultan SST GGHSS No.2 Hoti Mardan		Against the post	vacant
ŀ	1.58.	963	Shadina Naz MA B.ED GGHS Kityari	SS Pashto BS-17 GGHSS Kityari Dir Lower	Against the post	vacant
F	159.	972	Saeeda Begum MA B.ED GGHS Sado Dir Lower	SS Pashto BS-17 GGHSS Sado Dir Lower	Against the post	vacant
ļ	160.	982	Yasmeen Ghani GGHS Dargai Mkd	SS Pashto BS-17 GGHSS Batkhela Malakand	Against the post	vacant
-	161.	986	Miss Sajida Begum SST (G) GGHS Gandheri Tangi	SS Pashto BS-17 GGHSS Mandani Charsadda	Against the post	vacant
	162.	987	Miss Tasleem Akhtar SST (G) JICA Model School Umarzai	SS Pashto BS-17 GGHSS Tarnab Farm Peshawar	Against the post	vacant
	163.	1008	Mst. Naila Afshan SST GGHSS Teri Karak	SS Pashto BS-17 GGHSS Teri Karak	Against the post	vacant
	164.	1033	Najma Shahid GGHS Tordher Swabi	SS Pashto BS-17 GGHSS Topi Swabi	Against the post	vacant
	165.	1077	Ahmiat GGMS Maneri Payan Swabi	SS Pashto BS-17 GGHSS Shamansoor Swabi	Against the post	vacant
	166.	1141	Nargas Ghaffar M.A; M,.Ed GGMS All Abad	SS Pashto BS-17 GGHSS Charbagh Swat	Against the post	vacant
	167.	1159	Bibi Shakeela Akhtar SST (G) GGHS Charsadda	SS Pashto BS-17 GGHSS Chamkani Peshawar	Vice S. No. 3	58
F	168.	1169	Mufeeda Begum GGHS Yaqubi	SS Pashto BS-17 GGHSS Kalu Khan Swabi	Against the post	vacant
1	(169.	) 1188	Sadia Bibi GGMS Nihar Bangla Mkd	SS Pashto BS-17 GGHSS Haryan Kot Malakand	Against the post	vacant
	170.	1190	Mst. Anjum Nisa SST GGMS Pewar Kurram Agency	Services placed at the disposal of FATA	Against the post	vacant
	171.	1265	Najia Kousar MA, B.ED GGCMS Tarnow	SS (Pashto) BS-17 GGHSS Badwan Dir Lower	Against the post	vacant
	172.	1404	Safia Gul GGMS Safroona Swabi	SS Pashto BS-17 GGHSS Dagai Swabi	Against the post	vacant
,	173.	1473	Saima Anjum SST GGHS Islamia Collegiate Peshawar	SS Pashto BS-17 GGHSS Hayatabad Peshawar	Against the post	vacant
	174.	1514	Shabana GGHS Dargai Mkd	SS Pashto BS-17 GGHSS Palai Mkd	Against the post	vacant

# 5. History-cum-civics

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S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
175.	496	Mst. Humaira Ulfat SST GGHS Islamia Collegiate Peshawar	SS His-cum-civics BS-17 GGHSS Sufaid Sung Peshawar	Against the vacant post
176.	637	Farhat Tazeen Anwar MA. M.Ed GGCMSS No.1 A/Abad	SS His-cum-Civics BS-17 GGHSS Havelian Abbottabad	Against the vacant post
177.	675	Sofia Noureen/ MA,Med GGHSS Tarnab Form Peshawar	SS His-cum-civics BS-17 GGHSS Aza Khel Bala Nowshera	Against the vacant post
		Met Rahat Mahiaheen SST	SS His-cum-civies BS-17 GGHSS	Against the vacant

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	. 6			7	
· , -	181.	1131	Nusrat Samreen MA,M.ED GGHS Shore Kot DIK	SS His-cum-civics BS-17 GGHSS Prova DIKhan	Against the vacant post
	182.	1207	Mst. Bushra Begum SS (Sc) GGHS Takkar Takht Bhai Mardan	+ NN 1DS-CI0D-CIVICS $-$ HN-17 LIGHTNN	Against the vacant post
	183.	1246	Nasira Bibi MA Pol.Science GGMS Nawan Killi Nowshera	SS His-cum-civics BS-17 GGHSS Rashakai Nowshera	Against the vacant post
	184.	1268	Shahida Khanam GGHSS Chokara Karak	SS His-cum-civics BS-17 GGHSS Chokara Karak	Against the vacant post
	185.	1272	Mst. Safia Begum SST GGHS Chowki Mamraiz Nowshera	No. 2 Pabbi Nowshera	Against the vacant post
	186.	1279	Raheela begum GGMS Shamroz abad dagi Swabi	Dagai Swabi	post
	187.	1285	Shagufta Parveen GGHS Yakatoot Peshawar	SS His-cum-civics BS-17 GGHSS Wadpaga Peshawar	Against the vacant post
	188.	1398	Musarrat Shaheen GGHSS Topi	SS His-cum-civics BS-17 GGHSS Topi Swabi	Against the vacant post
	189.	1405	Rukhsana Saced GGHS Turlandi	SS His-cum-civics BS-17 GGHSS Shewa Swabi	Against the vacant post
	190.	1420	Amina Iqbal, SST (Gen) GGHS, Abba khel Lakki	SS His-cum-civics BS-17 GGHSS Titar Khel Lakki Marwat	Against the vacant post
	191.	1426	Ikramia Begum SST GGMS Shoaib Abad Mardan	SS His-cum-civics BS-17 GGHSS Sawal Dher Mardan	Against the vacant post
	192.	1451	Latafat Mehreen, SST (Gen), GGMS, Qeemat Manjiwalla Lakki	SS His-cum-civics BS-17 GGHSS Ghazni Khel Lakki	Against the vacant post
	193.	1507	Meena Khan MA M.Ed GGHSS Tahir Abad Swat	SS His-cum-Civics BS-17 GGHSS Tahir Abad Swat	Against the vacant post
ſ	194.	1510	Mst. Rahila Anwer SST GGHS Baffa Mansehra	SS His-cum-civics BS-17 GGHSS Shinkiari Mansehra	
	195.	1571	Naheed Begum MA, M.Ed GGHS Toot Killi Mardan		
	196.	1606	Bibi Aisha SST (G) GGHS Achini Payan		Against the vacant post
	197.	1625	Shazia Ahsan MA. M.Ed/ M.Phill GGMS Tajwał	SS His-cum-civics BS-17 GGHSS Trangri Bala Mansehra	Against the vacant
	198.	1630	Mst. Amria Begum SST GGHSS Kot Mkd	SS His-cum-civics BS-17 GGHSS Kaddi Swabi	post Against the vacant
	199.	1634.	Tabassum Bibi GGHSS Kot Mkd	SS His-cum-civics BS-17 GGHSS Kot Malakand	-
	200.	1670	Asima Hanif SST GGCMS Mandoori Nowshera	SS His-cum-civics BS-17 GGHSS Harichand Charsadda	post Against the vacant
F	201.	1671	Mst. Farzana Bibi SST GGHSS Sakhakot Mkd	SS BS-17 GGHSS Sakhakot Malakand	post Against the vacant
	202.	1682	Syed Ruqia Bukhari MA/M.Ed GGHSS Panjtar Bunir	SS His-cum-civics BS-17 GGHSS Panjtar Bunir	Against the vacant
F	203.	1699	Nazia Habib MA Pol. Science GGHS, #1 Pabbi	SS His-cum-civics BS-17 GGHSS	post Against the vacant
F	204.	1739	Nadia Bibi GGHSS Sakhakot	Badrashi Nowshera Inst: RITE (F) Dargai Mkd	post Against the vacant
ŀ	205.	1742	Mst. Nasima Bibi SST`(G) GGHS Reshum Chitral	SS His-cum-civics BS-17 GGHSS	post Against the vacant
	206.	1752	Sabahat Zohra MA, M.Ed GGHS Bakri Banda Mardan	Shiakotake Chitral SS His-cum-civics BS-17 GGHSS Ghalldhar Mardan	post Against the vacant
	207.	1799	Salma Gul MA, M.Ed GGHS Tambulak Mardan	Ghalldher Mardan SS His-cum-civics BS-17 GGHSS Katlawi Mardan	post Against the vacant
	208.	1802	Bibi Saima MA/M.Ed GGHS	Katlang Mardan SS His-cum-civics GGHSS No.2	post Against the vacant
	209.		Moorat Maira Tasleem Bibi MA , B.ED	Mansehra SS His-cum-civics BS-17 GGHSS	post Against the vacant
	210.	1915	GGHSS Asbanr Mst. Robina Qureshi GGHSS		post Against the vacant
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	0000	Mst. Agil	1 SST	(G)	GGHS	SS His-cum-civics BS-17 GGHSS	Against f	the vacant
214.	2757	Wardaga C				Mandani Charsadda	post	

S#	Pak Study Senty: list	Name of Officer and School Address	Proposed place of Posting	Remarks
215.	<u>No.</u> 728	Hamida Begum M.Sc M.Ed GGHSS No.2 S.Sharif Swat	SS Pak Study BS-17 GGHSS Odigram Swat	Against the vacan
216.	789	Azra Bano MA/MED GGHS Hattar	SS Pak Study BS-17 GGHSS Noordi Haripur	Against the vacant post
217.	911	Bushra Qasim M.A;M.Ed GGGS Afsar Abad Swat	SS Pak Study BS-17 GGHSS Kala Killi Swat	Against the vacant post
218.	937	Shahnaz Begum M.Sc B.EdGGHS Amankot Swat	SS Pak Study BS-17 GGHSS Charbagh Swat	Against the vacan post
219.	959	Bibi Halima M.A;M.Ed GGMS Kaanju Swat	SS Pak Study BS-17 GGHSS Gwalerai Swat	Against the vacan post
220.	1044	Taj Begum, BSc, MSc, MAM.Ed GGHSS Tikri Kharari	SS Pak Study BS-17 GGHSS Tikri Khararai Battagram	Against the vacan post
221.	1152	Mst. Shahida SST GGHS Sarband Peshawar	SS Pak Study BS-17 GGHSS Sufaid Sang Peshawar	Against the vacant post
222.	1164	Tujza Abbasi I/C SDEO (F) Lakki Marwat	SS Pak Study BS-17 GGHSS Bangash Khel Bannu	She will actualize her promotion as SS BS-17 & Join the post of SDEO (F Lakki Marwat
223.	1186	NASIRA KHAN GGMS SAJAN KILI Mardan	SS Pak Study BS-17 GGHSS Ghalladher Mardan	Against the vacant post
224.	1217	Mst. Salima Akhtar SST GGHS Safobari Band Charsadda	SS Pak Study BS-17 GGHSS Ziam Charsadda	Against the vacan post
225.	1271	Mst. Tahira Yasmin SST GGHS Fattah DIKhan	SS Pak Study BS-17 GGHSS Behari Colony DIKhan	Vice S. No. 359
226.	1273	Zainab SST (Science), GGHS No.3, Lakki	Ghazni Khel Lakki Marwat	Against the vacan post
227.	1313	Bibi Nargis M.Sc, M.Ed GGHS Kass Koroona Mardan	SS Pak Study BS-17 GGHSS Gujar Garhi Mardan	Against the vacar post
228.	1324	Mst. Naheed Akbar SST GGHS Samandar Khan Kot NWA	Service placed at the disposal of FATA	
229.	1332	Naila Tabassum MA P/S GGHSS, Nowshera cantt	SS Pak Study BS-17 GGHSS Badrashi Nowshera	post
230.	1355	Bibi Bilquis Begum, MSc & MA, MEd GGHSS Tikri Kharari	SS Pak Study BS-17 GGHSS Shinkiari Mansehra	Against the vacan post
231.	1383	Safia Begum MA, B.Ed GGMS Feroz Pur Mardan	SS Pak study BS-17 GGHSS Par Hoti Mardan	Against the vacar post
232.	1406	Mst. Mehrooda Bibi SST (S) GGHS Barenis Chitral	SS Pak Study BS-17 GGHSS Shiaqotake Chitral	Against the vacar post
233.	1407	Rubina Bibi SST (G) GGHSS Takhti Khurd Mansehra	SS Pak study BS-17 GGHSS Takhti Khurd Mansehra	Against the vacar post
234.	1458	Mrs, Zulekha Bibi (MA/Med) GGHS Mullazai Tank	SS Pak Study BS-17 GGHSS Mullazai Tank	Against the vacar post
235.	1467	Nasira Parveen MA/B.Ed: GGHS Surati Killa Karak Mst. Laila Zeb SST Se GGHS	SS Pak Study BS-17 GGHSS Esak Chuntra Karak SS Pak Study BS-17 GGHSS	Against the vacan post Against the vacan
236.	1505	Warijun Chitral	Warijun Chitral	post
237.	1513	Naheeda Khan SST GGHS Maulay Khan Kot SWA	Service placed at the disposal of	post
238.	1590	Naheed Akhtar SST Sc GGHSS Kuthiala A/Abad	SS BS-17 GGHSS Khanpur Haripur	Against the vacan post

242.	1743	Niggar Tabasum M.sc,M.ED GGHSS Kulachi	SS Pak Study BS-17 GGHSS Kulachi DIKhan	Against the vacan post
243.	1771	Miss Seema Gul SST (G) GGHS Jamrooz Khan Killi Chd	SS Pak Study BS-17 GGHSS Mandani Charsadda	Against the vacan post
244.	1800	Alia Muslim SST GGCMS Karim Abad	SS Pak Study BS-17 GGHSS Alo Mardan	Against the vacan post
245.	1814	Shahnaz Begum SST GGMS Sanazo Shah Charsadda	SS Pak Study BS-17 GGHSS Koper Malakand	Against the vacan post
246.	1843	Shehla Badar SST GGHS Fateh DIKhan	SS Pak Study BS-17 GGHSS Mitha Pur DI Khan	Against the vacan post
247.	1863	Safia Rehana Iqbal GGHS Rangpur Shumali	SS Pak Study BS-17 GGHSS Paharpur DIKhan	Against the vacant post
248.	1874	Anwar Begum, SST (Science), GGHS No.4, Khoidad Khel	SS Pak Study BS-17 GGHSS Nar Shukrullah Bannu	Against the vacant post
249.	1914	Mst. Safia SST GGHS Rajjar Charsadda	SS Pak Study BS-17 GGHSS Harichand Charsadda	Against the vacant post
250.	2334	Sadaf Mohib SST GGMS No.1 Peshawar Cantt:	SS Pak Study BS-17 GGHSS Tarnab Farm Peshawar	Against the vacant post
251.	2363	Lubna Tauheed SST GGHSS Shabaz Ghari Mardan	SS Pak Study BS-17 GGHSS Shahbaz Ghari Mardan	Against the vacant post
252.	2379	Uroosa Naufame SST GGHS Khano Khel DIKhan	SS Pak Study BS-17 GGHSS Fazli Rahim Colony D.I.Khan	Against the vacant post
253.	2443	Mst. Haleema Farooq SST GGHS Marghuz Swabi	SS Pak Study BS-17 GGHSS Zarobi Swabi	Against the vacant post
254.	3224	Mst. Shabana Khan SST GGHS Jalandar Khan Kot SWA	Service placed at the disposal of FATA	Against the vacant post

# 7. Home Economics

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
255.	1448	Farzana Yasmeen GGHS Esak Chountra Karak	SS Home Economics BS-17 GGHSS Esak Chountra Karak	Against the vacant post

8.	Economics	6		
S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
256.	663	Bushra Khatoon MA, M.Ed GGCMSS No.1 A/Abad	SS Economics BS-17 GGHSS Sherwan Abbottabad	Against the vacant post
257.	1109	Dure Shawar SST GGHS No.2 A/Abad	SS Economics BS-17 GGHSS Lora Abbottabad	Against the vacant post
258.	1233	Najiya Shakir M.Phil, M.Ed GGHS Baghdada Mardan	SS Economics BS-17 GGHSS Toru Mardan	Against the vacant post
259.	1315	Mst. Syeda Irum Sultana SST (G) GGHS Sard China Swabi	SS Economics BS-17 GGHSS Rustam Khel Mardan	Against the vacant post
260.	1371	NADIA AHMAD GGHS KHAZANA DHERI Mardan	SS Economics BS-17 GGHSS Jandar Par Mardan	Against the vacant post
261.	1379	Safia Sultan MA/MED GGHS Dehdan Haripur	SS Economics BS-17 GGHSS Bandi Muneem Haripur	Against the vacant post
262.	1401	Samina Shahzadi MA/M.Ed GGHS Dhodial Mansehra	SS Economics BS-17 GGHSS Behali Mansehra	Against the vacant post
263.	1479	Sultana Bibi MA/ M.Ed GGCMS Chairah Mansehra	SS Economics BS-17 GGHSS Shergarh Mansehra	Against the vacant post
264.	1529	Sadaf Quratulhiain MA/M.Ed GGMS Sanda Sar	SS Economics BS-17 GGHSS Phulra Mansehra	Against the vacant post
265.	1620	Jehad GGHS Sard Cheena Swabi	SS Economics BS-17 GGHSS Shawa Swabi	Against the vacant post
766	1670	Afsheen Faruh GGHS	SS Economics BS-17 GGHSS	Against the vacant

<sup>©</sup> 270.	1683	Nazira GGHS Garangdara	SS Economics BS-17 GGHSS Palai	Against the vacant
270.	1005	Mkd	Malakand	post
271.	1711	Gul Naz MA/M.Ed GGHS	SS Economics BS-17 GGHSS	Against the vacant
2/1.	1/11	Khawari Mansehra	Tarawara Mansehra	post
272	1765	Saira Naz Khattak GGHSS	SS Economics BS-17 GGHSS	Against the vacant
272.	1765	Chokara Karak	Chokara Karak	post
070	1007	Sadaf Iqbal SST GGCMS	SS Economics BS-17 GGHSS Esak	Against the vacant,
273.	1807	Lakki Ghundaki Karak	Chountra Karak	post
		Mst. Salma Saddiq SST	Service placed at the disposal of	Against the vacant
274.	1847	GGHSS Ghalanai Moh:	FATA	post
		Agency		
275.	1878	Barsila Zaib MA/M.Ed	SS Economics BS-17 GGHSS Oghi	Against the vacant
273.	1070	GGHSS Murad Pur Mansehra	Mansehra	post
(276.)	(1929)	Seema Mujahid SST GGMS	SS Economics BS-17 GGHSS	Against the vacant
270.7	1929	Mandori Mardan	Takhtbhai Mardan	post
277.	2370	Mst. Farkhanda Jabeen SST	SS Economics BS-17 GGHSS	Against the vacant.
217.		(G) GGHS Moldeh Chitral	Shaikotake Chitral	post
278.	2411	Rehana Afzal SST GGMS	SS Economics BS-17 GGHSS	Against the vacant
270.		Wanda Mochianwala DIKhan	Paroa, D.I.Khan	post
279.	2512	Mst. Saima Ali SST (G)	SS Economics BS-17 GGHSS Aza	Against the vacant
279.	2312	GGHS Malogo Peshawar	Khel Payan Nowshera	post
280.	2527	Mst. Sadia Azdi SST GGHSS	SS Economics BS-17 GGHSS	Against the vacant
200.		Fazal Rahim Colony DIKhan	Mitha Pur DIKhan	post
281.	2669	Mst. Sarwat SST (G) GGHS	SS Economics BS-17 GGHSS	Against the vacant
201.	2009	Kot Baba Tangi Charsadda	Umerzai Charsadda	post
282.	3172	Mst. Asia Ashfaq SST (G)	SS Economics BS-17 GGHSS	Against the vacant
202.	5174	GGHS Qaid Abad Peshawar	Sufaid Sung Peshawar	post

<u>9. S</u> S#	Statistics Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
283.	1781	Shawana Nawaz Hashmi GGMS Segri Matwala Shah DIKhan	SS Statistics BS-17 GGHSS Paharpur D.I.Khan	Against the vacant post
284.	2620	Sadia Irum MSc B.Ed GGHS Yakatoot Peshawar	SS Statistics BS-17 GGHSS Sufaid Sung Peshawar	Against the vacant post

10. 1	Maths Senty:			
S#	list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
285.	1126	Mst. Niamat Ara Qureshi SST GGHSS Comp: Peshawar	SS Maths BS-17 GGHSS Lady Grift Peshawar	Against the vacant post
286.	1455	Zahida Parveen M.Sc:/M.Ed: GGHS Ahmad Abad Karak	SS Maths BS-17 GGHSS Chokara Karak	Against the vacant post
287.	1524	Aisha Noreen MSC/MED GGHS Noordi	SS Maths BS-17 GGHSS Noordi Haripur	Against the vacant post
288.	1612	Sadia Noman MSC/MED GGHS Ghazi Hamlet	SS Maths BS-17 GGHSS Topi Swabi	Against the vacant post
289.	1717	Fozia Faiz M.sc ,M.ED GGMS Potah DIKhan	SS Maths BS-17 GGHSS Methapur DIKhan	Against the vacant post
290.	1748	QANDEEL-E-AYESHA WAHEED BS-16 PITE Peshawar	SS Maths BS-17 GGHSS Kiri Raiki A/Abad	Against the vacant post
291.	1854	Nadia Naz M.Sc, M.Ed GGHS Baghicha Dheri Mardan	SS Maths BS-17 GGHSS Baghicha Dheri Mardan	Against the vacant post
292.	1876	Asma Anjum MA, M.Ed GGCMSS No.1 A/Abad	SS GGCHSS Abbottabad	Against the vacant post in her own pay & scale
293.	1886	Kalsoom Bibi SST MSC MED	SS Maths BS-17 GGHSS Bandi Muneem Harinur	Against the vacant nost

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•	•	S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
<b>`</b> •	4	295.	1266	Nadia Majeed MSC Physics GGHS, Azakhel Payan	SS Physics BS-17 GGHSS Aza Khel Payan Nowshera	Against the vacant post
<b>`</b> *		296.	1865	Bibi Rabia M.Sc B.Ed GGHSS Matta	SS Physics BS-17 GGHSS Charbagh Swat	Against the vacant post

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
297.	578	Noreen Maroof GGHSS Malikpura	SS Chemistry BS-17 GGHSS Sherwan Abbottabad	Against the vacant post
298.	587	Mst. Rabiah Baby SST (Sc) GGHS No.1 Kohat	SS BS-17 GGHSS Jungle Khel Kohat	Against the vacant post
299.	794	Farzana Manzoor SST MSC BED GGHS Mang	SS Chemistry BS-17 GGHSS Panian Haripur	Against the vacant post
300.	855	Mst. Rizwana Akhtar SST (Sc) GGMS Chiga Lar FR Lakki	Service placed at the disposal of FATA	Against the vacant post
301.	901	Rizwana Ishrat MSC/MED GGHS Hattar	SS Chemistry BS-17 GGHSS Hattar Haripur	Against the vacant post
302.	902	Shabana Iqbal MSc/ Chemistry GGHS Noordi	SS Chemistry BS-17 GGHSS Chapra Haripur	Against the vacant post
303.	942	Musarat Husain M.Sc.BEdGGHS Ahingaro dherai	SS Chemistry BS-17 GGHSS Odigram Swat	Against the vacant post
304.	1001	Shamim Akhtar SST MSC /M.Phil Edu. CGMGHS Haripur	SS Chemistry BS-17 GGHSS Noordi Haripur	Against the vacant post
305.	1073	Rozia Bibi GGHS Gulshan Abad Swabi	SS Chemistry BS-17 GGHSS Gulshan Abad	Against the vacant post
306.	1229	Shaista Jabeen GGHS Nawan shar A/Abad	SS Chemistry BS-17 GGHSS Kari Raiki Abbottabad	Against the vacant post
307.	1245	Saima Rahim GGHS Khurram Karak	SS Chemistry BS-17 GGHSS Domel Bannu	Against the vacant post
308.	1251	Nadia Bibi GGHS SHAMSHAD ABAD Mardan	SS Chemistry BS-17 GGHSS Sokai Mardan	Against the vacant post
309.	1283	Mst. Naheed Bibi SST GGHS Sultanpur A/Abad	SS Chemistry BS-17 GGHSS Lora Abbottabad	Against the vacant post
310.	1289	Riffat Parveen/ MA, M.Sc Med GGHS Mohmandabad	SS Chemistry BS-17 GGHSS Chamkani Peshawar	Against the vacant post
311.	1290	Umme Kalsoom GGHS Bamkhel Swabi	SS Chemistry BS-17 GGHSS Baja Swabi	Against the vacant post
312.	1294	Nelofar M.Sc M.ed GGHS Qandil Swat	SS Chemistry BS-17 GGHSS Fatehpur Swat	Against the vacant post

13. E	Biology			
S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
313.	826	Shazadi Nadia Safdar MSC/MED GGHS Chapra	SS Biology BS-17 GGHSS Hajia Gali A/Abad	Against the vacant post
314.	1066	Farzana Shafi GGHS Rajoya	SS Biology BS-17 GGHSS Garhi Phulgram Abbottabad	Against the vacant post
315.	1172	Zaibun Nisa M.Sc B.Ed GGHS Barikot	SS Biology BS-17 GGHSS Odigram Swat	Against the vacant post
316.	1236	Romana Aslam SST (Sc) GGHSS Hayatabad Peshawar	SS Biology BS-17 GGHSS Sufaid Sung Peshawar	Against the vacant post
317.	1239	Shehla Sarwar SST (Sc) GGHS Qasab Khana Peshawar	SS Biology GGHSS Comp: Peshawar	Against the vacant post
318.	1249	Miss Amina Khan SST (G) GGHSS Shabqadar Fort	SS Biology BS-17 GGHSS Havelian Abbottabad	Against the vacant post
319.	1288	Zahida Bibi M.Sc Botany GGHS, #1 Pabbi	SS Biology BS-17 GGHSS No.2 Pabbi Nowshera	Against the vacant post
320.	1292	Saima Sultan/ MSc,Med GGHSS Nishtarabad	SS Biology BS-17 GGHSS Badber Peshawar	Against the vacant post

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321.	1295	Panr Swat	Banda Swat	Against the vacant post
322.	1297	Shakira Aziz GGCMHSS Canal Road Mardan	S SS Biology BS-17 GGHSS Ghala Dher Mardan	
323.	1309	Rafaqat Ara MSC Botny GGHSS, Shaidu	<ul> <li>SS Biology BS-17 GGHSS Shaidu Nowshera</li> </ul>	Against the vacant
324.	1318	Neelam MSc.M.Ed GGHS Jamal Garhi Mardan	SS Biology BS-17 GGHSS Jandhar Par Mardan	
325.	1427	Bushra Jehan GGHS Ghundi Killa Karak	Karak	Against the vacant post
326.	1432	Sajida GGHS Ghundi Killa Karak	Chountra Karak	Against the vacant post
327.	1469	Rahat Maheen, SST (Science), GGHS, Dalo Khel Lakki	SS Biology BS-17 GGHSS Titter Khel Lakki Marwat	Against the vacant post
328.	1501	Gul Naz GGHS Kalu Khan Swabi	SS Biology BS-17 GGHSS Shewa Swabi	Against the vacant post
329.	1547	Mst Khadija Bibi SST Gen: GGHS Broze Chitral	SS Bijology BS-17 GGHSS Sheyaqotak Chitral	
330.	1595	Uzma Zeb MA/M.Ed GGHSS No.2 Mansehra		
331.	1629	Amina Khatoon M.Sc M.Ed GGHSS Kabal Swat		
332.	1652	Zeenat Jehan MSc, B.Ed, M.Ed GGHSS Takht Bhai	SS Biology BS-17 GGHSS Parkho Dheri Mardan	Against the vacant post
333.	<sup>9</sup> 1688	Mst. Ishrat Farid SST (Sc) GGHSS Saidu Sharif Swat	SS Biology BS-17 GGHSS Odigram Swat	Against the vacant post
334.	1698	Tabassum Naz MSc GGHSS Sawal Dher	SS Biology BS-17 GGHSS Shahbaz Garhi Mardan	Against the vacant post
335.	1720	Hajira Bibi MSc/ MED GGHS Sangian	SS Biology BS-17 GGHSS Lora Abbottabad	Against the vacant post
336.	1723	Miss Jamila Salah Uddin SST (Sc Biology)GGHS Behlola Charsadda	SS Biology BS-17 GGHSS Dhakki Charsadda	Against the vacant post
337.	1749	RAISA NAZ GGCMS HAMZA DHER Swabi	SS Biology BS-17 GGHSS Dagai Swabi	Against the vacant post
338.	1767	SALMA NAZ GGHS MADI BABA Mardan	SS Biology BS-17 GGHSS Takht Bhai Mardan	Against the vacant post
339.	1770	Samra Bibi MSC/MED GGHS Mang	SS Biology BS-17 GGHSS	Against the vacant post
340.	1772	Seema Rani GGHS Ghumawan	SS Biology BS-17 GGHSS Rich Bhen Abbottabad	Against the vacant post
341.	1819	Sharafat MSc. B.Ed. M.Ed GGCMHSS Katlang	SS Biology BS-17 GGHSS Baghicha Dheri Mardan	Against the vacant post
342.	1829	Shamsun Nihar GGHS Ganderi Khattak Karak	SS Biology BS-17 GGHSS Lachi Kohat	Against the vacant post
343.	1852	Bibi Amina GGHS Sard Cheena	SS Biology BS-17 GGHSS Gulshanabad Manerai Payan Swabi	Against the vacant post
344.	1862	Bayina MSc, B.Ed GGCMHSS Katlang	SS Biology BS-17 GGHSS Kati Garhi Mardan	Against the vacant post
345.	1888	Lubna Siraj M.Sc M.Ed GGHSNo.1 Mingora	SS Biology BS-17 GGHSS Fateh Pur Swat	Against the vacant post
346.	1910	Akhtar Munir M.sc,M.EDGGMS Khaki DIKhan	SS Biology BS-17 GGHSS No.9 DIKhan	Against the vacant post
347.	1997	Naveeda Tariq SST (Sc) GGHSS Jogiwara Peshawar	SS Biology BS-17 GGHSS Jogiwara Peshawar	Against the vacant post
348.	2017	Mst. Sadia Bibi SST (Sc) GGHS Asbanr Dir Lower	SS Biology BS-17 GGHSS Asbanr Dir Lower	Against the vacant
349.	2032	Mst. Bushra Saleem SST (Sc) GGMHSS Haripur	SS Biology BS-17 GGHSS	Against the vacant
350.	2047		SS Biology BS-17 GGHSS	post Against the vacant
	2048			post Against the vacant

		Manki Swabi	Banda Nowshera	post
354.	2213	Mst. Robina Nazli SST GGHS	SS Biology BS-17 GGHSS Matta	Against the vacant
		Sambat Swat	Swat	post
355.	2236	Mst. Parveen Nisa SST (Sc)	SS Biology BS-17 GGHSS Kalpani	Against the vacant
555.	2230	GGHSS Kalpani Bunir	Bunir	post

S#	Name of Officer and School Address	Proposed place of Posting	Remarks
356.	Mst. Zahida Jabeen HM working as SS Urdu GGHSS No. 2 Peshawar Cantt:	SS Urdu BS-17GGHSS Aza Khel Payan Nowshera	Against Vacant Post
357.	Mst. Sabiha Begum SS Islamiyat GGHSS Paroa DIKhan (Belongs to Kohat)	Instructor RITE (F) Kohat	Against Vacant Post. In her own pay & scale
358.	Mst. Askara Bibi SS Pashto GGHSS Chamkani Peshawar	SS Pashto BS-17 GGHSS Sufaid Sang Peshawar	Against Vacant Post
359.	Mst. Sabiha Ihsan MA (Political Science) working as SS Pak Study, GGHSS Bihari Colony DIKhan	SS His-cum-civics BS-17 GGHSS Bihari Colony DIKhan	Against Vacant Post
360.	Mst. Rakhshanda Mehndi, SS English, GGHSS No. 2 Peshawar Cantt:	SS English BS-17, GGHSS University Town Peshawar	Against Vacant Post

2. On their promotion, the Subject Specialist concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

No. TA /DA allowed.

#### SECRETARY

## Endst. No. & date as above.

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Copy to:

3.

- 1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
- 2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
- 3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
- 4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
- 5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
- 6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 7. The Director Education FATA, Warsak Road, Peshawar.
- 8. The Director Curriculum & Teachers Education, Abbottabad.
- 9. The Director ESRU, Khyber Pakhtunkhwa.
- 10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification on E&SE Department website (www.kpese.gov.pk)
- 11. The District Education Officers, Elementary & Secondary Education concerned.
- 12. The District Accounts Officers concerned.
- 13. PS to Secretary E&SE Department.
- 14. Subject Specialist concerned.
- 15. Office File.

(NAIK MUHAMMAD) SECTION OFFICER (PRIMARY)

# Fresh Enquiry Report

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About

Directly inducted/Suspected Secondary School Teachers (SSTS) in FATA

Directorate of Education FATA FATA Secretariat Warsak Road Peshawar

Βv

# INQUIRY REPORT ABOUT DIRECTLY INDUCTED / SUSPECTED SECONDARY SCHOOL TEACHERS (SSTs) IN FATA

### INTRODUCTION:

The Secondary School Teachers (SST)'previously known as SET are the backbone of the Secondary level of Education in the Public Sector Schools i.e. Middle, High & Higher Secondary, they are usually appointed/recruited through departmental promotion committeeOR through Public Service Commission. It would be appropriate to elaborate that SST (BS-16) is provincial cadre post and the Director Elementary & Secondary Education Khyber Pakhtunkhwa is appointing authority for appointment against the post of SST (BS-16) both in Khyber Pakhtunkhwa and FATA, while Director Education FATA is only limited to the adjustment of the SSTs whose services are placed at the disposal of Director Education FATA for further posting in various Agencies / FRs of FATA.Previously as per recruitment policy, 50% SSTs are directly recruited/ appointed through Public Service Commission, whereas, 50% are through Departmental Promotion Committee from different teaching cadre, and 25% is through initial recruitment(Annex-A). Recruitment of SSTs were lastly made through Public Service Commission in 2012while in 2008 SSTs were recruited on adhoc/contract basis and then regularized.

#### Background

In the 1<sup>st</sup>quarter of 2016, there were rumors/reports/complaintscontinuously received in the Directorate of Education FATA, from various quarters that various numbers of SSTs/SETs have been inducted in the system and working in differentAgencies/FR's of FATA, without adopting the proper recommendations from Khyber Pakhtunkhwa, Public Service Commission norrecommended by the Departmental promotion committees. Responding positively to the call of hour, the Director Education FATA immediately assigned the task to two Assistant Directors namely Muhammad Kashif and Muhammdullah to check credentials of all the SSTs working in FATA and cross match their appointment and selection order with the record of the Directorate bi Elementary & Secondary Education and Public Service Commission Khyber Paktunkhwa.

The two Assistant Directors of the Directorate of Education FATA asked all the Agency Education Officers in FATA to furnish complete credentials of all the existing SSTs working in their respective areas of administrative control. Subsequent to cross checking with the record of the Public Service Commission Khyber Pakhtunkhwa and Directorate of Elementary & Secondary Education Khyber Pakhtunkwa , 158 SSTs working in FATA were declared as grey/suspected and recommended to hold in-depth investigation and probing against them(Annex-B).

Responding to the recommendations of the above said inquiry committee high level inquiry Committee under the chairmanship of the Director Education FATA constituted with the approval of the Additional Chief Secretary FATA to conduct inquiry der the enclosed TORs at (Annex-C). The inquiry Committee after a lot of meetings and correspondence with quarters concerned has prepared report signed by the three (03) members including chairman. In meantime NAB Khyber Pakhtunkhwa also intervened in the instant issue/case and asked for submission for the inquiry report to NAB office.

When report submitted signed by three (3)member to NAB, a controversy aroused, in the verified list of SST, provided by this office and that provided by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa. As the lists of verified SSTs received to this office under the covering memo, in response to this office letters were denied / disowned by Directorate of Elementary & Secondary Education and this made the issue further deteriorated. Further in a meeting held in NAB office on 8.2.2018 attended by all members of the committee, subsequently it was decided to conduct a fresh enquiry in the instant case, by asking Public Service Commission and Directorate of Elementary and Secondary Education Department Khyber Pakhtunkhwa for provision the list, they recommended and they promoted / recruited on adhoc / contract basis and later regularized.

## PROCEDURE:

Now to proceed as per a new directives of the Enquiry Officer NAB KPK Peshawar a meeting of the Enquiry Committee was held at Directorate of Education FATA Peshawar on dated 12.2.2018 and it was decided to bifurcate all 158 SSTs into three categoriesi.e. Category-I

Those who were appointed on the recommendations of Public Service Commission KPK. Category-II

Those who were appointed on contract basis and later on regularized by Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa. Category-III

Those who were either appointed batch-wise alongwith those who were promoted by the DPC. After categorization a list of ninety seven (97) SSTs were sent to Public Service Commission Khyber Pakhtunkhwa with the remarks to kindly verify that whether they are recommended by it's office vide this office letter No. 2448 dated 12.2.2018, No. 2620 dated 14.2.2018 and No. 2805 dated 19.2.2018 respectively(Annex-D-E-F).

While the list of those SSTs who were either appointed through contract basis and later on regularized or through DPC or batch-wise was submitted to Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa vide this office letter No. 2479 dated 13.2.2018 and No. 2489 dated 13.2.2018 respectively**(Annex-G-H)**. response to the above mentioned letters both the quarters have submitted the

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	$\sum_{i=1}^{n} \frac{1}{2} \nabla_{i}$
Public Service Commission	Khyber Pakhtunkhwa
Allistof SSTs male general,	(Annex-I)
2.list of SSTs female General, (Ann	ex-J)
3.list of SSTs Science (Male)	(Annex-K)
4. List of SSTs Science (Female)	(Annex-L)
5. List of SSTs Male (G) Disabled	(Annex-M)
6. List of SSTs Female (G) Disabled	(Annex-N)
B) Directorate of Elementary 8	& Secondary Education Khyber Pakhtunkhwa
1.list of SSTs male	(Annex-O)
2.list of SSTs female.	(Annex-P)

te information as given below.

The committee cross checked the list of 158 suspected SSTs with the list provided by the above two mentioned quarters and concluded as below.

# FINDINGS:

From the scrutiny, perusal and cross checking of the record provided byPublic Service Commission Khyber Pakhtunkhwa & Elementary and Secondary Education Department Khyber Pakhtunkhwa alongwith available record in the Directorate of Education FATA, following conclusion has been drawn as reflected against each.

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1	S. Adin Shah	S.Yahya Jan	this office videletterNo.		exonerated
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			Recommended by PSC for		
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2	Ashiq Ali	Muhammad	this office vide letterNo.		exonerated
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. 3 .	S.IftikharHussain	S.	reported to this office letter		exonerated
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7	Muhammad Shoaib	Mir Sahib	this office videletterNo.		exonerated
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1	Inayatullah	Zahoorud Din		reported to this office vide	lexonerateda
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33	Yar Muhammad	Pir Adam	this office videletterNo.		hexonerated
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	Muhammad		letter No.2811/File-1/SST (M)		
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Muhammad Anwar	Daud Jan	this office videletterNo.	· · · · · · · · · · · · · · · · ·	exonerated s	
	1 · · · ·	I		144年4月1日1月1日1月1日1日1日1日1日1日1日1日1日1日1日1日1日1日1日	1
		PCS/SR/II/ 04034 dated	· · ·	1999年19月2日日本	ي بريم مانين

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	· · ·	21.2.2018 at S. No. 47 (Sc)	·.		
		Recommended by PSC for apptt as SST (Sc) reported to this office videletterNo		Paristan TiMay bear	
Noor Andaz	Muqarrab	PCS/SR/II/.04034 dated		dexonerated 4	and the second
	Khan	21.2.2018 at S. No. 56 (Sc)			
		Recommended by PSC for	•		100
Muhammad Miraj	Nawab Khan	apptt as SST (G) reported to		defilMay be own	111.111 111.111
Khan		•this office videletterNo.		lexonerated	Trease of the second second second second second second second second second second second second second second
میں میں بند ہیں۔ اور اور		PCS/SR/II/ 04034 dated			
		21.2.2018 at S. No. 116 (G)			
	•	· · ·			
Naheeda Khan	Mir Baz Khan	<b>-</b>		exonerated in	:
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	•		· · ·	False (	
Salia	Ali Shah	· · · · ·			<u> 1996 - 1</u>
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Coursing Maga	Noor			sexonerated	and a second
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	wunannidu	1	· · ·		144 H
			Only regularization order is		Claimer -
	•		available, no apptt order	Fake /	1210124
Dilshad	Hayatullah	· · ·	(Contract) reported to this	directly	10000
			office vide letter No.3016/A-	inducted	
			17/SST (F) general casesdt		
			19.2.2018 at S. # 5		10 10 10 10 10 10 10 10 10 10 10 10 10 1
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			available, no apptt order	directly	a the second second second second second second second second second second second second second second second
SaminaQalandar	Qalandar	······	(Contract) reported to this	inducted	<u>V</u> 10
	Khan	· ·	office vide letter No.3016/A		
			17/SST (F) general casesdt		
•			19.2.2018 at S. # 19		· ·
	· · ·	-	Only regularization order is	]	
			available, no apptt order	Fake /	
Tahira Shah	Nobahar		(Contract) reported to this	directly	
	Shah		office vide letter No.3016/A	inducted	
			17/SST (F) general casesdt	•••••	
· · · ·					
			19.2.2018 at S. #.6		•
;	Muhammad Miraj Khan Naheeda Khan Safia Safia Samrina Noor Dilshad	KhanMuhammad MirajNawab KhanKhanMir Baz KhanNaheeda KhanMir Baz KhanSafiaAli ShahSafiaAli ShahSamrina NoorNoorMuhammadHayatullahDilshadHayatullahSaminaQalandarQalandarKhanTahira ShahNobahar	AmountRecommended by PSC for apptt as SST.(Sc) reported to this office VideletterNo. PCS/SR/II/04034 dated 21.2.2018 at S. No. 56 (Sc)Muhammad MirajNawab KhanRecommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/04034 dated 21.2.2018 at S. No. 116 (G)Noheeda KhanMir Baz Khan	Recommended by PSC for apptt as SST (SC) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 56 (SC)         Mihaanmad Miraj       Nawab Khan Nimeda Khan       Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 116 (G)         Naheeda Khan       Mir Baz Khan Nir Baz Khan       Verified/ owned by E&SE RP (contract/regularization) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 116 (G)         Safia       Ali Shah       Recommended by PSC for apptt as SST (SC) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. # 3         Safia       Ali Shah       Recommended by PSC for apptt as SST (SC) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. # 3         Safia       Ali Shah       Recommended by PSC for apptt as SST (SC) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. # 3         Samina Moor       Noor       Recommended by PSC for apptt as SST (SC) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. # 3         Dilahad       Hayatullah       Only regularization order is available, no apptt order (Contract) reported to this office vide letter No. 3016/A- 17/SST (F) general casedt 19.2.2018 at S. # 3         SaminaCalandar       Qalandar Khan       Only regularization order is available, no apptt order (Contract) reported to this office vide letter No. 3016/A- 17/SST (F) general casedt 19.2.2018 at S. # 13         SaminaCalandar       Nobahar       Only regularizatio	Nor-Andia:         Recommended by PSC for appt as SST [SG] reported to this differ videletterNo. PCS/SN/I/ 04034 dated 21.2.2018 at S. No. 56 (SC)         No. PSC PSC PSC           Mihammad Miraj Khan         Recommended by PSC for appt as SST (G) reported to this office videletterNo. PCS/SN/I/ 04034 dated 21.2.2018 at S. No. 116 (G)         Verified/ owned by E8.3E KP (contract/regularization). PCS/SN/I/ 04034 dated 21.2.2018 at S. No. 116 (G)         Verified/ owned by E8.3E KP (contract/regularization). PCS/SN/I/ 04034 dated 21.2.2018 at S. No. 25 (SC)           Naheeda Khan         Mir Baz Khan         Verified/ owned by E8.3E KP (contract/regularization). PCS/SN/I/ 04034 dated 21.2.2018 at S. H 3         Verified/ owned by E8.3E KP (contract/regularization order is available, no appt order (Contract) reported to this office vide letter No. 3016/A- 19.2.2018 at S. H 4         Pake / Instructed           Safia         All Shah         Recommended by PSC for appt as SST (SC) reported to this office vide letter No. 3016/A- 19.2.2018 at S. H 4         Pake / Instructed           Safia         Northore vide letter No. 3016/A- 19.2.2018 at S. H 5         Only regularization order is available, no appt order (Contract) reported to this office vide letter No. 3016/A- 19.2.2018 at S. H 5         Pake / Inducted           Dishad         Hayatuliah         Only regularization order is available, no appt order (Contract) reported to this office vide letter No. 3016/A- 19.2.2018 at S. H 3         Pake / Inducted           SaminaQalandar         Colandar Khan         Only regularization order is available, no apptit order (Contract) reported to this office vide letter

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	7 -		· .			Verified/ owned by E&SE KP	
						(contract/regularization)	COURS NAME N
		24/L-II	Muhammad Shahid	Aslám Khan		reported to this office vide	exc
	IJ ,				-3	letter No.2811/File-1/SST (M)	
						FATA/NAB Inquiry/2018 dated	
						16.2.2018 at S. # 18	
	• •				Recommended by PSC for		
: 	· '				apptt as SST (G) reported to		
5	0	25/L-II	Noor Badshah	Mehroom	this office videletterNo.		
				Shah	PCS/SR/II/ 04034 dated		exc
	-	··· ·			21.2.2018 at S. No. 138 (G)		
					ų - <sup>1</sup>		l 'F
5	1 .		Said Mohammad	Shaida Khan			appi
			Khan				DoE
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							No:
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		·				Verified/ owned by E&SE KP	
· . . 52	· .	· ·	Abdur Rahim	<b>D</b>	· ·	(contract/regularization)	N
<i>د</i> ت .	-		ADdur Kanım	Daulat Khan		reported to this office vide	exo exo
				- -		letter No.2811/File-1/SST (M)	
.`						FATA/NAB Inquiry/2018 dated	
<u>.</u>					· · · · · · · · · · · · · · · · · · ·	16.2.2018 at S. # 19	
IVIC	, YUMH	ND AG	ÇNCY				
					Recommended by PSC for		to gifted they be
- 1. H. J.							
га		-			apptt as SST (Sc) reported to		M
53		58	AsilSher	MuhabbatShe	apptt as SST (Sc) reported to this office videletterNo.		
53		58	AsilSher	MuhabbatShe r	apptt as SST (Sc) reported to		M exor
		58	AsilSher		apptt as SST (Sc) reported to this office videletterNo.		
53		58	AsilSher		apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated		
- <u>-</u>		58	AsilSher		apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc)		exor
53					apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for		exor
				r	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to		exor
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				r	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. ECS/SR/II/ 04034 dated		exor
				r	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. ECS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G)		exor
		59	Hayat Khan	r	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. ECS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for		exor Ma exon
54		59	Hayat Khan	r Yousaf Khan	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. FCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to		
54		59	Hayat Khan	r Yousaf Khan GulBahadar	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. FCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo.		exor Ma exon
54		59	Hayat Khan	r Yousaf Khan GulBahadar	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G)		exor Ma exon
54		59	Hayat Khan	r Yousaf Khan GulBahadar	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. FCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for		exor Ma exon
54		59	Hayat Khan Zeban Shah	r Yousaf Khan GulBahadar	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. FCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for apptt as SST (G) reported to		exor Ma exon Ma
54		59	Hayat Khan Zeban Shah	r Yousaf Khan GulBahadar MouriGul	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. FCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo.		exor Ma exon exon
54		59	Hayat Khan Zeban Shah	r Yousaf Khan GulBahadar MouriGul	apptt as SST (Sc) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 14 (Sc) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. FCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for apptt as SST (G) reported to		exor Ma exon

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				Recommended by PSC for		
K .				apptt as SST (Sc) reported to		May be
57	64	Muhammad Gul	SawabGul	this office videletterNo.		exonerated
	<sup>1</sup> .			PCS/SR/II/ 04034 dated		
ж.				21.2.2018 at 5. No. 3 (Sc)		
				(Disable)		eri (1947) (Tr. 2017) de Marinel, rei 1977 - Marinel Marinel, rei (1977) 1977 - Marinel Marinel, rei (1977)
	· ·	· · · · · · · · · · · · · · · · · · ·				
2 58				Recommended by PSC in		Maybe
-	68	Sajidullah	Balhi Khan	the light of court order	· ·	exonerated
				vide at S. No. 277		
59	69	Abdul Hai	Muhammad			
		Abdui Hai		<b></b> -		Fake / directly
•		-	Таууар			inducted as
			-			no record is
						available with KPK as
· .						reported vide
				•		letter No. 2811 file No.
						1 SST (M)
						FATA/NAB
						Inquiry dt 16.2.2018
					Only regularization order is	
	73	Hizran Begum	Muhammad	i	available, no apptt order	Fake/
00	- '		   Roshan		(Contract) reported to this	directly
 	• .				office vide letter No.3016/A-	inducted
·. ·			τ	•	17/SST (F) general casesdt	
					19.2.2018 at S. # 7	
-						Fake /
61	74 ·	Tablester	E. J.D			
		TahiraNaz -	Fazal Dayan			directly
:		· · ·	 	•	· · ·	inducted
· · .						Fake /
62	75	SarwatJehan	GulRahman		· · · ·	directly
	• • • •		· .			inducted
			f	Recommended by PSC for		
	· ·		· . ·	apptt as SST (Sc) reported to		May be
63	76.	lmtiazMukhtar	Mukhtar	this office videletterNo.		exonerated
		(Female)	Ahmad	PCS/SR/II/ 04034 dated		
	· · · ·			21.2.2018 at S. No. 21 (Sc)		
		. <u>.</u>				Fake /
64	77	Ishrat	BahadarSher		· · · ·	directly
		annut	Banadaraner			inducted
					· · · · · · · · · · · · · · · · · · ·	·
65				· ·		Fake /
	78	Ghazala Sana	Sanaullah		······································	directly
· · ·			.  11-≟ - 10	· · ·		inducted
						.Fake /
66	79	Alia Taj	Tajud Din		· · ·	directly
	•				· · · · · ·	inducted
· · ·					· · · · · · · · · · · · · · · · · · ·	Fake /
. 67	81 <sup>.</sup>	Seema	Ikram-ud-Din			directly
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$\langle / -$						inducted
	68 82	0.000				Fake /
		Asma	Muhammac	· · · · · · · · · · · · · · · · · · ·		directly
7 1 . Tr			Akbar			inducted
					Only regularization order is	Fake /
6					available, no apptt order	directly
0	9. 83	NudratAfshan	. Muhammad		(Contract) reported to this	inducted
			Sharif		office vide letter No.3016/A-	
					17/SST (F) general casesdt	
· · ·		· · · · · · · · · · · · · · · · · · ·			19.2.2018 at S. # 20	
					Verified/ owned by E&SE KP	
					as appointed through DSC	May ber
70	7/L-II	Gul Salam	Abdul Matin		reported to this office vide	mexonerated
					letter No. 2811 file no. 1	
• •					SST(M) FATA/NAB enquiry	
··. · <u>·</u>				· ·	dated 16.2.2018	
71						Fake /
	8/L-II	Zafariqbal	GulRahman			directly
	· · · · · ·					inducted
70			·			Fake /
72	9/L-11	Abdul Malik	Säid			directly
			Muhammad			inducted I
						Fake /
73	10/L-II	Muhammad	Muhammad			directly
		Farooq	Yousaf			inducted
•			<u>.</u>			<u> </u>
74	11/L-II	Shakirullah	Zargar			Fake /
· · .						directly •
	- <u>-</u> -			· · · · · · · · · · · · · · · · · · ·		inducted
75	12/L-II	Hazrat Jan	Akhtar Jan			Fake /
						directly
		· · · · · · · · · · · · · · · · · · ·		Recommended by PSC for		inducted
•				apptt as SST (Sc) reported to		
. 76	   13/Ľ-II	Muhammad Anwar	Hazrat Zamin	this office videletterNo.		May be
			11021 81 201101	PCS/SR/II/ 04034 dated		exonerated
				21.2.2018 at S. No. 21 (Sc)		
	1/L-III	Muhammad Suhail	GhunchaGul			Fake /
77						directly
						inducted
. 78						Fake / directly
	· 2/L-III	Shah Nawaz Khan	Shah Nazar	·		inducted
КНҮВ	ER AGENC	Ŷ		-		
			· · · ·	Recommended by PSC for		1997 (1997), 1997 (1997), 1997 (1997), 1997 1997 - Jan Standard, 1997 (1997), 1997 1997 - Jan Standard, 1997 (1997), 1997 (1997), 1997
				apptt as SST (G) reported to this office videletterNo.	· · · · · · · · · · · · · · · · · · ·	May be
79	84	Tikka Shah	Haji Shanak	PCS/SR/II/ 04034 dated		exonerated.
			-	21.2.2018 at S. No. 4 (G)		

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Disable       Recommended by PSC for       apptt as SST (Sc) reported to       this office videletterNo.	May, De
Recommended by PSC for apptt as SST (Sc) reported to	May De
apptt as SST (Sc) reported to	May be
	May be
Abdullan" this office videletterNo.	<b>新生产的</b> 在于10年代的10年代,10
	exonerated.
PCS/SR/II/ 04034 dated	
21.2.2018 at S. No. 11 (Sc)	
Recommended by PSC for	
apptt as SST (G) reported to	
81 90 Aman Akbar Khan Akbar this office videletterNo.	May be
	exonerated
PCS/SR/II/ 04034 dated	
21.2.2018 at S. No. 25 (G)	
Recommended by PSC for	
apptt as SST (G) reported to	
82 94 Ali Khan Wali Khan this office videletterNo.	Maybetz
PCS/SR/II/ 04034 dated	r exonerated
21.2.2018 at S. No. 24 (G)	
Recommended by PSC for	
83 98 Safia Begum Tabir Shab this affect the sefect of the	Maybe
83 98 Safia Begum Tahir Shah this office videletterNo.	Hexonerated rs
PCS/SR/II/ 04034 dated	
21.2.2018 at S. No. 38 (G)	
Recommended by PSC for	
apptt as SST (Sc) reported to	
84 99 ShaziaAyub Ayub Khan this office videletterNo.	er May be
ans once videletterino.	exonerated
PCS/SR/II/ 04034 dated	
21.2.2018 at S. No. 18 (Sc)	
	Fake /
85 100 Sumaira Khan Bahadar	directly
	inducted
86. 14/L-II FazleHaleem KamilHussain	Fake /
	directly
	inducted
Verified / owned by E&SE KF	
as appointed through batch	
87. wise / year, wise merit	EMay be
15/L-II Said:Bahadar Khan Bahadar appointment reported to thi	·本意义的记忆, · · · · · · · · · · · · · · · · · · ·
office vide letter No. 2811 fil	10月1日日日 · · · · · · · · · · · · · · · · · ·
no. 1 SST(M) FATA/NAB	
188 16/L-II Mühammad Muhammad Muhammad	
i Muhaninau	Fake /
Naeem Saleem	directly inducted
89 17/L-II Attaullah - Abdul Jabbar	Fake /
	directly
90 18/L-II Gohar Ali Haji Said Recommended by PSC for	inducted
Appointment as SST (G)	May berry
reported to this office vide at	exonerated
<u>5. No. 51</u>	

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1.2	00 00 00 00 00 00 00 00 00 00 00 00 00	I Muhammad Qasim	n Mukammil			
1						Fake /
- <u>] </u>			Shah - >			directly inducted
	1 <sup>4</sup> 4/L-I	FazliRaziq	Fazli-Rabi			Fake /
Red.				***		directly
102	· /·   5/L-II	Asad Rahim	Noor Rahim			inducted
		Fload Admin				Fake /
						directly
🦉 . 103	6/L-II	Loban Ali	Muhib Ali			inducted Fake /
						directly
104		Noor Muhammad	Muqeem			inducted
						Fake /
			Khan			directly inducted
105		Muhammad	Maneem			Fake /
		Naeem	Khan			directly
106		ShabinaNaz	· · · · · · · · · · · · · · · · · · ·			inducted
100	· · .	JIDUIIANAZ	Raj Wali Khan			Fake /
· ·					· · · · · · · · · · · · · · · · · · ·	directly
107		Ghazala	Ikramud Din	· · · · · · · · · · · · · · · · · · ·		inducted Fake /
						Fake / directly
						inducted
· ,					_	Fake / directly
					· · ·	inducted as per report of PSC
<i>.</i>						while KP
08		SeemaMujahid	Mujabid Ali	· ·		Elementary &
		Jocemanujamu	Mujahid Ali		-	Secondary Education has
						owned her
4. <sup>1</sup>			· · ·			recommendati
					· .	. on and apptt
	, .	· · · ·				vide letter no. 3016/A17
						SST/(F)/G cases
						dt 19.2.2018 at
· · · .						s.no. 9 Fake / directly
						inducted as per
				· ·		report of PSC
		-				while KP Elementary &
99		Shazia Jan	Jan Afzal			Secondary
						Education has
						owned her recommendati
						on and apptt
			ļ			vide letter no.
· · · ·						3016/A17 SST/(F)/G cases
						dt 19.2.2018 at
			Chulana la <sup>11</sup>			s.no. 10
0	• •	Abdul Wahid	Ghulam Jalil			Now retired as H/M and
· - *						may be
						exonerated
- 11		Mohammad Tariq	Sher		-	Fake /
		-	Mohammad			directly
		Dachie Abura -	Khan		· · · · · · · · · · · · · · · · · · ·	inducted
12		Bashir Ahmad क्ष	Khan Mohammad		· · ·	Fake / directly
•	•					inducted
D	J.KHAN			•	- <u>-</u>	
· · <u>·</u>			·	Recommended by PSC for		
				apptt as SST (G) reported to		May be
3	134	Muhammad Wali	Shah Wali	this office videletterNo.		exonerated
				PCS/SR/II/ 04034 dated		
· · _			-	21.2.2018 at S. No. 123 (G)		
4	28/L-II	Abdul Baseer	Ghulam Khan			Fake /

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	138				· .	
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Ż		÷ .	<i>.</i>		Verified/ owned by E&SE KP	
7	115   i	6 Ayaz Khan	Muhammad	· · ·	.(contract/regularization)	May b exonerat
	*   .	,	Dost	•	reported to this office vide	
Ē	4		DOST		letter No.2811/File-1/SST (M)	
4					FATA/NAB Inquiry/2018 dated	
$\frac{n}{11}$	6 13	R Khalid Mahara			16.2.2018 at S. # 25	
	0 13	8 Khalid Mahmood	d Syed Khanan			
	ţ			apptt as SST (G) reported to		se eMayibe
				this office (through court		execution and the second second second second second second second second second second second second second se
<u> </u>	·	· · · · · ·	r.	order)		
117	139	MehnazAfridi	Zahir Shah	Recommended by PSC KPK		
	<u> </u>			as per 2005 advertisement		in May be
•				Recommended by PSC for	· · · · · · · · · ·	<u>exonerate</u>
.18	27/L-I			apptt as SST (G) reported to		- May be
		Faiz Muhammad	Amanat Khan	this office videletterNo.		hexonerate
•				PCS/SR/II/ 04034 dated	-	
				21.2.2018 at S. No. 43 (G)		
Я ТА	ANK					North Sheet Series
					Verified/ owned by E&SE KP	
:					(contract/regularization)	May be
19	140	Abdur Rashid	Ayaz Khan		reported to this office vide	exonerated
ĺ					letter No.2811/File-1/SST (M)	
					FATA/NAB Inquiry/2018 dated	
		· .			16.2.2018 at S. # 28	
				Recommended by PSC for		
		-		apptt as SST (Sc) reported to		May be
20	141	Muhammad Iqbal	Muhammad	this office videletterNo.		exonerated
			Ali	PCS/SR/II/ 04034 dated		
	. •			21.2.2018 at S. No. 46 (Sc)		
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<u>.</u>		· · · ·		Recommended by PSC for	· . 	*. 
		· · ·		apptt as SST (G) reported to		
n	142	Samiullah Jan	Yousaf Khan	this office videletterNo.		May be
						exonerated
;				PCS/SR/II/ 04034 dated		
!+-				21.2.2018 at S. No. 157 (G)		
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						inducted
22 i	29/1-11	Mst. Iqbal Fatima	Gul Fatima			however
:						ansfer order from KP to
		•				FATA is
<u> </u>			<u> </u>			available

	gruháty.					•••••
					Verified/ owned by E&SE KP	
					(contract/regularization)	
\$123 1	144	Arshadullah Khan	Muhammad		reported to this office vide	Hexol
關於			Zaman		letter No.2811/File-1/SST (M)	
					FATA/NAB Inquiry/2018 dated	
د <u>م</u>				·	16.2.2018 at S. # 29	
•					Verified/ owned by E&SE KP	
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124	145	Muhammad Israr	Ghaffar Khan		reported to this office vide	Siexor
	· ·	Khan			letter No.2811/File-1/SST (M)	
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•					16.2.2018 at S. # 30	
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125	146	Muhammad	Muhammad	this office videletterNo.	· · · ·	E 是 了 Exon
-		Numan	lqbal	PCS/SR/II/ 04034 dated		
· .				21.2.2018 at S. No. 48 (Sc)		
				Recommended by PSC for		
.	, .			apptt as SST (G) reported to		
26	147	Muhammad Nisar	Shalam	this office videletterNo.		当时Ma 包括 包在
				PCS/SR/II/ 04034_dated		
	•.••••			21.2.2018 at S. No. 2 (G)		
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•••				Recommended by PSC for		
				apptt as SST (G) reported to		
27	148	SamiulHaq	Hazor Jan	this office videletterNo.		A Mayben exonerated
•	·		•	PCS/SR/II/ 04034 dated		
•				21.2.2018 at S. No. 158 (G)		
	. •			Recommended by PSC for		
ì				apptt as SST (Sc) reported to	·	
: 28	149	HaidarZaman	Shahzada	this office videletterNo.		exonerated
-			,	PCS/SR/II/ 04034 dated	· · ·	
				21.2.2018 at S. No. 1 (Sc)		
				·	· · ·	Fake /
29	155	Nasrat	` Hayat Khan			directly
30	- 156	Nargis	Bahadar Khan			inducted
50	- 150	149: 812	Danauai Kilan			Fake /
		•			· · · · ·	directly inducted
31	9/L III	Basra Begum	FazliWahab		· · · · · · · · · · · · · · · · · · ·	Fake /
•	<u>.</u>					directly,
	1					inducted

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	MOHMANE	AGENCY				
		Yar Khan	Ali Rehman	- <u> </u>		Fake / directly inducted
KH KH	IYBER AG	ENCY				
13	3	Nasir Khan	Muhammad	<u>·</u>	· · · · · · · · · · · · · · · · · · ·	Fake / directly
			Ghani		· · · · · · ·	inducted
134	4	Sabir Shah	Tamash Khan	Recommended by PSC for apptt as SST (G) reported to this office videletterNo.		May be exonerated
		•		PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 151 (G)		
135		Kifayatullah	Rahim Khan			Fake / directly inducted
136		Ahmad Shah	Feroz Shah			Fake / directly inducted and already Struck off from the
						role of DoE FATA vide No. 1947-52 dated 26.1.2017
)R/	KZAI AG	ENCY				20.1.2017
				Recommended by PSC for		
137.		Muhammad	SherAslam	apptt as SST (Sc) reported		
.57.		MudassirAslam		to this office videletterNo.		May be exonerated
				PCS/SR/II/04034 dated		
			-	21,2.2018 at S. No. 47 (Sc)		
		Said Hakim	<sup>1</sup> Amin Gulab	Recommended by PSC for apptt as SST (G) reported to		
38 :				this office videletterNo.		exonerated
•				PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 152 (G)		
39.		Raza	Wali Khan			Fake / directly
		Muhammad				inducted
			· .	Recommended by PSC for		
40		GulShehzad	Mir Azam Khan	apptt as SST (Sc) reported	· , .	May be
		Khan		to this office videletterNo.		exonerated
. •				PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 28 (Sc)		
•				Recommended by PSC for	· · · · · · · · · · · · · · · · · · ·	
41		Muhammad	Muhammad	apptt as SST (Sc) reported	•• •	May be
.,		Ibrahim	Ghan:	to this office videletterNo.		exonerated
				PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 45 (Sc)		
42		SaimaWadud	Wadud Khan			Fake / directly inducted

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					Fake / direc
		·			inducted as report of PS
					while KP
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	Sabiha	MianGul Jan		·	Secondary Education h
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					recommendat and apptt vid
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					SST/(F)/G cas dt 19.2.2018
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SOUTH W	AZIRISTAN AGEN	ICY			
144	Inayatullah	Muhammad		· · · · · · · · · · · · · · · · · · ·	- Fake / direct
		Yousaf			inducted
45	Sajjad Ahmad	Abdul Nawab		-	Fake / directl
· · ·					inducted
AJAUR AG	GENCY				
46	ShabanaBibi	Abdul Sattar			
					Fake / directly inducted as per
					report of PSC
				··· · · · ·	while KP Elementary &
				· · ·	. Secondary
					Education has
					owned her recommendation
					and apptt vide
				• • •	letter no. 3016/A17
					SST/(F)/G cases
					dt 19.2.2018 at s.no. 14
S					Fake / directly
					inducted as per
7	Colmo Johnon				report of PSC while KP
7	Salma Jabeen	1 Abdul Ghaffar			Elementary &
			· ·	,	Secondary <ul> <li>Education has</li> </ul>
				1	owned her
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					and apptt vide letter no.
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, .				· · · · · · · · · · · · · · · · · · ·	s:no. 15
0	Chine al Mall				Fake / directly
8	SaimaWali				
		ItbarGul			inducted
8	SaimaWali Mst; Alia	ltbarGul			Fake / directly
)		ItbarGul Mir Alam khan			
	Mst; Alia				Fake / directly inducted

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	151		InayatRahman	AbdurRahman		Fake / directly	-
•	· · ·		A		 	inducted	
	152		Nizakať	Said Ali Shah		Fake / directly	
•					 	inducted	ŀ

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		A AGEN			· · · · · · · · · · · · · · · · · · ·	Fake / directly
	Kalsoor	n Shah	Qimat Shah			inducted
	Ikramia	Begum	Muhammad Sardar			Fake / directl inducted
			LIST OF D	UPLICATED SSTs		-
155	44	Maula J	an	Shahi Khan	apptt as SS to this offi No. PCS/ dated 21.2 42 (Sc) a	ded by PSC for (Sc) reported ce vide letter SR/II/ 04034 2018 at S. No. and may be ed at s.no 37
156	69	Abdul I	łai	Muhammad Tayyi	as no reco with KPK as letter No. SST (M) Inquiry d	ectly inducted rd is available reported vide 2811 file No. 1 FATA/NAB t 16.2.2018 at no. 59
157	82	Asma	<u> </u>	Muhammad Akbar	Fake	/ directly l at S. No. 68
158	67	Inayati	Rahman	AbdurRahman		/ directly at S. No. 151

No. of SSTs verified / recommended by KP PSC	= 59
No. of SSTs verified by E&SE KP	= 26
No. of SSTs fake/directly inducted in system	= 69
Total	=154

RECOMMENDATIONS:

3.

From the scrutiny and perusal of the record in the Directorate of Education FATA, Directorate of Elementary & Secondary Education KPK,lists provided by Public Service Commission KPK, investigation of the SSTs concerned and dealing hands along with discussions / meeting of the enquiry committee, it is recommended that:

No of fifty nine(59)SSTs whose recommendations for appointment verified by Khyber Pakhtunkhwa Public Service Commission may be exonerated from the charges of fake/directly inductees.

Further twenty six(26) No of SSTs whose contract appointment and regularization orders verified by Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa may also be exonerated from the charges of fake / directly inductees.

The No. of Sixty nine (69) SSTs who were neither recommended by Public Service Commission Nor promoted / recruited by Elementary & Secondary Education Khyber Pakhtunkhwa, their salaries may immediately be stoppedand proceeding under efficiency and disciplinary rules 2011 may be initiated.

Directorate of Elementary & Secondary Education KPK may be asked to place the services of all the (BS-16) and above new recommendees of Zone-I by Public Service Commission

Khyber Pakhtunkhwa at the disposal of AI&C Deptt: FATA Secretariat being the proper forum for posting in FATA, in the light of Estab: Deptt: Govt. of KPK (Regulation Wing) letter No. SOR-VI/E&AD/1-10/2009 dated 30<sup>th</sup> July 2009**(Annex-Q)**.

Previously the interims reports by the two members i.e. Shams-u-Zaman Section Officer (AI&C Deptt) FATA Secretariat and MohibAfridi Agency Finance Officer FATA Secretariat were made the part of the report submitted to NAB(Annex-R&S), but was not considered up to mark by NAB authorities. However the response of the two members in the light of the draft enquiry report submitted to them for their feedback vide this office letter No. 4080-82 dated 02.03.2018(Annex-T)is hereby includedin the fresh enquiry vide (Annex-

A detailed inquiry is already under process in the instant case in NAB office Khyber Pakhtunkhwa the responsibility against the officials / officers involved in this game of blunder will be fixed in the light of recommendations by NAB office after finalization of the said inquiry as all the relevant record has been handed over to NAB office and still is in their custody.

II.

akzai Agend Mr. Attiq-ur-Rehman/

Muhammad Nawaz/\_\_\_\_\_ Coopted/Member Asstt: Director (Estab)

Hanif-ur-Rehman Addl: Director (Estab)

**U)**)

·.6.

Chairman Enquiry Committee Director Education FATA.

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

# PESHAWAR

.

Civil Miscellaneous Application No. ..../ 2019

# Mst. Ishrat.....Appellant

# VERSUS

Government of Khyber Pakhtunkhwa & others......Respondents

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Reply to Civil Miscellaneous Application by Khyber Pakhtunkhwa Public Service <i>man</i> Commission	- , 	1
2.	Affidavit		2

√ Senior ⊭aw Officer Khyber Pakhtunkhwa Public Service Commission Peshawar

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Civil Miscellaneous Application No. ....../ 2019 Mst. Ishrat......Appellant

#### VERSUS

# REPLY TO CIVIL MISCELLANEOUS APPLICATION ON BEHALF OF KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION (RESPONDENT NO. 03)

### PRELIMINARY OBJECTIONS:

- That the appellant has got no cause of action or locus standi to file the instant Civil Miscellaneous Application against the replying respondents.
- 2. That the instant Civil Miscellaneous Application is based on illegal / forged proof of the appellant against the lawful authority of the Public Service Commission.
- 3. That the instant Civil Miscellaneous Application is premature and bad in the eyes of law.
- 4. That the instant Civil Miscellaneous Application is the outcome of gross misstatement and fraud through which the appellant wants to mislead this Honorable Court.

## ON FACTS:

That all the documents annexed with the Civil Miscellaneous were examined against the record maintained by Khyber Pakhtunkhwa Public Service Commission. It was found that all the documents attributed to Khyber Pakhtunkhwa Public Service Commission find no support from office record or any indication that these are genuine. The signs and dispatch numbers do not tally with Commission's record. Contrary to this, the Khyber Pakhtunkhwa Public Service Commission is still relying on its previous replies to all the forty (40) connected service appeals.

It is, therefore, most humbly prayed that in light of above, the documents annexed in the instant Civil Miscellaneous Application may kindly be considered as not genuine and main appeal may be dismissed.

HTUNKHWA COMMISSION PESHAWAR (RESPONDENT NO.03)

### AFFIDAVIT

Stated on oath that the contents of this para wise reply are true and correct & nothing has been concealed from this Honorable tribunal.

# DEPONENTS

CHAIRMAN KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION PESHAWAR (RESPONDENT NO.03) 4

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

	Appellant
Service Apped	al No.1014/2019
IN	
C.M. No	of 2020

### ....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others ..... Respondents

S.#		ANNEX	PAGES
1.	Application for placing on file with affidavit		1-2
2.	KP PSC application form No.72208, dated: 12.02.2009	AA	3-7
3.	KP PSC interview call letter dated: 13.01.2011	BB	ė.
4.	KP PSC interview call letter dated: 04.01.2011	сс	9
5.	KP PSC interview call letter dated: 06.07.2011	DD	10
6.	KP PSC interview call letter dated: 16.11.2011	EE	11
7.	KP PSC recommendation dated: 27.02.2012	FF	12-13
8.	KP PSC recommendation dated: 06:01.2012	GG	14
9.	KP PSC recommendation dated: 11.05.2012	нн	15
0.	KP PSC recommendation dated: 12.02.2012	1	16
1.	KP PSC recommendation dated: 18.06.2012	JJ	17
2.	KP PSC recommendation dated: 15.01.2012	КК	18
3.	KP PSC verification of male SST (G), DATED: 23.08.2017	LL	19

# INDEX

Appellant/Applicant Through Amin ur Rehman Yusufza Sajjad Mehsud /// Khalld Khan Mohmand Karim Khan Afridi & Muaz Ashraf Khalil Advocates, Peshawar

Dated: 05.01.2021

## **BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

C.M. No.\_\_\_\_ of 2020 IN Service Appeal No.1014/2019

.... Appellant

Mst. Ishrat . . . .

I.

# ....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others ..... Respondents

## APPLICATION FOR AND ON BEHALF OF APPELLANT FOR PLACING ON FILE:

P PSC APPLICATION FORM NO.72208, DATED: 12.02.2009, (ANNEXED AT "AA")

- II. P PSC INTERVIEW CALL LETTER DATED: 13.01.2011 (ANNEXED AT "BB")
- III. P PSC INTERVIEW CALL LETTER DATED: 04.01.2011 (ANNEXED AT "CC")

IV. P PSC INTERVIEW CALL LETTER DATED: 06.07.2011 (ANNEXED AT "DD")

v. P PSC INTERVIEW CALL LETTER DATED: 16.11.2011 (ANNEXED AT "EE")

VI. P PSC RECOMMENDATION DATED: 27.02.2012 (ANNEXED AT "FF")

VII. P PSC RECOMMENDATION DATED: 06.01.2012 (ANNEXED AT "GG")

VIII. P PSC RECOMMENDATION DATED: 11.05.2012 (ANNEXED AT "HH")

- IX. P PSC RECOMMENDATION DATED: 12.02.2012 (ANNEXED AT "II")
- x. P PSC RECOMMENDATION DATED: 18.06.2012 (ANNEXED AT "JJ")
- xi. P PSC RECOMMENDATION DATED: 15.01.2012 (ANNEXED AT "KK")

XII. P PSC VERIFICATION OF MALE SST (G), DATED: 23.08.2017 (ANNEXED AT "LL")

EING ESSENTIAL FOR PROPER ASSITANCE OF THIS HON'BLE COURT AND JUST DECISION OF THE CASE.

### **Respectfully Sheweth:**

- 1. That the titled appeal alongwith 39 others is pending adjudication before this Hon'ble Court and fixed today i.e. 12.01.2021, for onward proceedings.
- 2. That the Respondent Department submitted undated inquiry report, allegedly prepared by the Directorate of Education of the erstwhile FATA, in view whereof, appellants were directed to place on file the subject mentioned documents, hence the instant application.

It is therefore, most humbly prayed that on acceptance of instant application, the subject mentioned documents may ordered to be

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It is therefore, most humbly prayed that on acceptance of instant<sup>2</sup> application, the subject mentioned documents may ordered to be placed on main file of the titled appeal, being essential for just decision of the case and proper assistance of this Hon'ble Court.

Appellant/Applicant

Amin ur Rehman Yusufz

Sajjad Mehs

Khalid Khan Mohmand

Karim Khan Afridi

&

Muaz Ashraf Khalil Advocates, Peshawar 3-A, Park Avenue, Bhettani Plaza, University Town, Peshawar Cell No.0321-9022964, 0333-9981464

Dated: 05.01.2021

# <u>AFFIDAVIT</u>

I, Mst. Ishrat W/O Sher Afghan Khan, Ex-SST (Gen), R/O Village Fazal Abad, Tehsil Takht Bhai, District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Application**' are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.



Deponent

	S.A. No. 98212019 AMMERIN	(AA)
NV	W.F.P. PUBLIC SERVICE COMMISSION APPLICATION FORM	3
APPLICATION N	FOR BANKS USE ONLY	
APPLICAT Rs. 285/- + Rs. 15 Total Rs.	5/- Bank Charges Signature of Bank Sofficer	
applied forS ertisement NoO/_/ al No. of Post5	S.E.T Space for rec passport size at photograph	tested
ame in block letters ather's Name in block letters	SHAKIR ULLAH ZARGAR	
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eligion	Islam	
) Date of birth as per Secondary School Certificate. ) Age on reckoning date	Year Month Days	
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<ul> <li>District/Agency of your Domicile.</li> <li>Zone of your Domicile. Tick mark (~) the appropriate box (see details of Zone under Para 10 of Instruc- tions attached with this form).</li> </ul>	Mohmand Azerrey V 2 3 4 5	WH sted
Zone of domicile of your husband (for married female candidates).	1 2 3 4 5	

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· · ·	9.	Do you claim physical disability?	Yes	Not If	yes, attach Medical C	ertificate.	
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# ACADEMIC QUALIFICATION STARTING WITH MATRICULATION EXAMINATION

1	2			H MATRICU	LATION EXAM	INATION	•
Certificate / Diploma / Degree / Postgraduate	School / College /	3	- 4 Year of Passing	5	6	7	
Degree	- Institution	Board / University	as a whole or in parts.	Marks obtained and total Marks.	Division and position in Board / University, if 1st, 2nd or 3rd.	Subject	
S.S.C	9. H. S.S. Ghallan	i Peshawar	1992	513/850	i vst	Science	·
Inter Escame	Private	Peshawar	1996-97	502/1100	2 ncl	Arts.	,
B.A.	Private.	Peshawar	2000-01	247/550	and	Arts	
M·A	Private	Peshawar	2000-01 2006.	521/1100	2nd	Pashto.	
B.ed	AL. Khair University (AJK)	Al Khair University (AJK)	2006.	589/1100:	2nd	• _	×34
·							·
The second					· -	G	(n)
: In case of your claim to an equivalent							
<ul> <li>In case of your claim to an equivalent of (a) Copy of the Charter of the Institut</li> <li>(b) Syllabi of the Examination.</li> <li>(c) Copy of Detailed Marks Certificate</li> </ul>	or the prescribed qualification,	on, state if it is recognized	by the University Grants	Commission. Add.			· 4
			* *				,

•

<b>17</b>	Have you been dismissed / removed from service under Federal or Provincial
	Government.

No. If yes, attach details.

18. I have upto-date applied for the following posts advertised by the Federal / Provincial Public Service Commission.

Yes

Post / Examination	No. of times applied	Year in which applied / appeared in Examination	Results, if already announced.
•			

19. Have you ever been disqualified / debarred from appearing in any examination conducted by the Provincial / Federal Public Service Commission. If so, give details.

	Year	Reasons
Post / Examination		

20. Attach the attested photo copies of the following documents with the application. Write page number on every document that you attach and record these in the 'column' page number. The Secondary Certificate will be at Page 7.

			Page No.	
	Name of document.		7 **	
(a)	Secondary School certificate.		8	
(b)	Intermediate		9	
(c)	Degree	· · · · · · · · · · · · · · · · · · ·	10	
(d)	Detail Marks Certificate.	t Decedil Leiversity if any	·	
(e)	Distinction Certificates from the Controller of Examinations of	the concerned Board/University, 1 city.	超-11	
(f)	(i) Character Certificate from the academic institute last atte	nded.		
	(ii) Character Certificate from two responsible persons.		******	
(g)	Domicile Certificate from Deputy Commissioner/Political Agen before joining Government service will produce their husband	nt (married female candidate if married d's domicile).		
(h)	Age Relaxation Certificate.			
	Medical Certificate of physical disability (for disabled candid	ates).		
	Discharge Certificate (for ex-Serviceman only).	h alad	4	
(k)		iched with this application.	12	
· (i)	National Identity Card (photo copy).		12	
(п	i) Three attested photographs.			
(n	) if applying for the post of Civil Judge, add the following		* • • • • • • • • • • • • • • • • • • •	
	<ul> <li>(1) Degree from University or Institute that you have passe Barrister or England/Ireland or a member of the Faculty</li> </ul>	d the Bachelor of Laws Examination or you are a of Advocates of Scotland.		

Page No. Name of document. ; , · (2) A copy of the Notification of admission and enrolment as a Pleader/Advocate, if you are a practising lawyer and claim benefit for age relaxation. (o) Age Concession Certificate. (p) Certificate in support of any other claim not covered by the above. (q) Any other document that you have attached. **B**.M. c Degree <u>lh.</u>: R). <u>m</u>. <u>.A</u> s) Bred degree = D.M.C 16 ۶. Domicile 1 1 2. (r) I solemnly declare that to the best of my aknolwedge my replies are correct. i •."; Sha Massai Place .... 12-02-09 Date.. Tather Signature of the Applicant Hes

# SA No-968/2017

# REGISTERED AMER BE

No.

Dated

ADDRESS ALL YOUR CORRESPONDENCE TO THE SECRETARY, N.W.F.P. PUBLIC SERVICE COMMISSION 2-FORT ROAD, PESHAWAR CANTT.

Telephone: 9213563, 9213750, 9214131, 9212897)

03237

То

U.GR Abdul Malik sto said muhannad shah Abdul Malik village Nookilig Propo Ghar clo Lal Din shel Keeper wawa Khan Market colles see

1873

Subject: -

1. With reference to your application for the above post, you are required in the Commission's Office at 2-Fort Road, Peshawar Cantt. (Near Governor House) at 08:30 a.m on 14/212011 for oral test (interview). Piease bring original certificates, degrees and testimonials which will be returned to you on conclusion of your interview.

S-t:T

2. You should rectify the following deficiencies failing which the Commission will reject your application and shall not interview you for the above post:

(a) (b) (c) (d) (e) intendent PD.NWFP.2391

SA NO- 1010/2019 A 13 Ammeser C REGISTERED ADDRESS ALL YOUR CORRESPONDENCE TO THE SECRETARY, N.W.F.P. PUBLIC SERVICE COMMISSION 2-FORT ROAD, PESHAWAR CANTT. Telephone: 9213563, 9213750, 9214131, 9212897) 161549 161549 /20 Dated To K Molich Ali · Kuyez R.0.7 GT& Linebi 12. Subject: 1. . With reference to your application for the above post, you are required in the Commission's Office at 2-Fort Road, Peshawar Cantt. (Near Governor House) at 08:30 17-##-9-: 2011 a.m. on\_ ...... for oral test (interview). Please bring original certificates, degrees and testimonials which will be returned to you on conclusion of your interview. You should rectify the following deficiencies failing which the Commission will reject 2. your application and shall not interview you for the above post: Desire .· (a) (b) (c) • (d) (e) Superintendent

SA#965/2019 Annexa REGISTERED NO.K.P-PSC-DS/ 040312 IYBER PUKHTOONKHWA PUBLIC SERVICE COMMISSION 2 Fort Road, Peshawar Cantt, (Neår Governor Dated: PH No. 9213563 Fax No. 9211795

To

House)

Kifayat Ullah S/O Rahim Ullalı Vill: & P/O Qasmi (Madad Khan Banda) Tehsil Takht Bhai Distt: Mardan

#### RECT: OF MALE SENIOR ENGLISH TEACHER (SCIENCE) (B-16) IN Subject: -SCHOOL AND LITERACY DEPARTMENT.

In-response to-your application for the subject cited post, you are required in the Commission's Office at 2 Fort Road, Peshawar Cantt, Near Governor House at 08:30 a.m. hours on 29/07/2011 for interview. Please bring original certificates, degrees and testimonials that will be returned on conclusion of your interview.

2. You should rectify the following deficiencies three days before interview positively failing which the Commission will reject your application and shall not interview you for the above post: -

> Departmental Permission Certificate. A

All DMC's before three days of interview. R С Photocopy of Matric, F.A Certificate. Photocopy of B.A/B.Sc,M.A/MSc/ Bed /Med Original Degree. Character Certificate from Two responsible E

persons. FΛ Character Certificate last attended Institution.

Domicile Certificate/Attested Photo G

Note :- Result of your interview will be displayed at our website WWW.NWFPPSC.gov.Pk very soon after the last date of the interview.

ANPENDENT

SA No. 1013 2019 Amalker EE ́Ъ REGISTERED N.W.F.P. PUBLIC SERVICE COMMISION, PESHAWAR 2-FORT ROAD NEAR GOVERNOE: HOUSE PESHAWR CANTT Telephone: 9213563 Da.ed: 11'# Y -d.Phet Pe Edd Basir, S/o ft. Gul Shar khan hauss Pensit & Plo Diraziona, PR. Universita and the Art Store at y With reference to your application on the above post, you are required in the Commission's Office at 2-Fort Road, (Near Governor House) at 8:30 a.m. on by for oral test (interview) Please bring original certificate, degree and estimonials which will be returned to you on conclusion of you interview. You should rectify the following ticked deficiencies failing which the Commission will reject your application and shall not interview you for the above post. (a) Adesied Photo Copies of Matrie, UA/F.Se/D.Com original certificates (b) Attested Photo Copy of P.A/M.A/ M. Sc/M.Com/MBA/M.Ed/ B.E. original .deprees (c) Departmental Permission Certificate from competent authority (d) Attested Photo copy of your dor, lo le corrificate, N.I.C. (c) Three attested photographs (1) Anested Photocopies of all DIAC' (g) Allested photocopy of Character Certificate(Last attended instit ne/Two <u>reponsibale persons</u>) たいでのい

Armere (F

### <u>Confidential</u>

Telephone: 92113563

Khyber Pakhtunkhwa Public Service Commission Peshawar

2-Fort Road Near Governor House Peshawar Cantt

No. KPK/PSC/SR-II/

Recommaddu



То

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Rectt of male SET/SST General Group B-16 in

Elementary & Secondary Education Deptt Peshawar

Subject;

Dear Sir.

In continuation to this office letter No. PSC SR-I/6588 dated 23.02.2012 on the subject noted

above and to state that the Commission recommends the following to the government for appointment:-

S.No.	Name of Candidate	Domicile	
1.	Iftikhar Ali S/O Meer Salam Khan	F.R Bunno /I	
2.	Abdul Baseer S/O Gulshan Khan	F.R.D.I Khan /1	+ SA NO-1013/2019
3.	Abdul Malik S/O Said Muhammad	Mohmand Agency /1	-> SA NO-1013/2019 -> SA NO-968/2019
4.	Muhammad Farooq S/O Muhammad Yousaf	Mohmand Agency / I	YSA NO. 971/2019
5.	Yar Khan S/O Ali Rahman		7 5A No- 960/2019
6.	Zafar Iqbal S/O Gul Rahman		7 SA NI- 96\$ /2019
7.	Hazrat Ali S/O Muhammad Qamar	Charasadda /2	
8.	Diyar Ali S/O Sabz Ali	Nowshehra /2	
9.	Falak Naaz S/O Sher Badshah	Peshawar /2	
10.	Sabir Ali S/Q Rahman Ullah	Mardan /2	
11.	Murad Ali S/O Ali Haider	Mardan /2	
12.	Khan Muhammad S/O Wazir Muhammad	Chatral /3	
13.	Muhammad Iqbal S/O Namir Gui	Malakand /3	
14.	Mahir Zada S/O Said Zareen	Buner /3	
15.	Naveed Husain S/O Bakhtpoor Khan	Dir /3	
16.	Saeed Khan S/O Ziarat Khan	Swabi Gadoon /3	A.S/E & SF. 8/16
17.	Rahmat Ullah S/O Rageem Khan	Tank /4	2.8.2.1
18.	Muhammad Ilyas S/O Muhammad Roshan	Bannu /4	
19.	Munir Ahmad S/O Muhammad Usman	D.i.Khan/4	H H
20.	Noor Muhammad Khan S/O Nawaz Khan	Karak /4	Allosta
21.	Saif Ur Rahman S/O Gut Marjan	L/Marwat /4	KKKM 1,

2. Recommendation in favour of the above 21 recommendees is provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

3

The inter-se-Merit of the recommendees will be communicated on finalization of all the pending

4. Recommendation in favour of <u>168 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

5. Original application (with enclosure) of the above 21 recommendees are enclosed herewith for your record, please acknowledge receipt.

Ends: No. KPK-PSC-SR-II/

Copy to: Director Elementary & Secondary Education Peshawar For Information

dated

#### (Director Recruitment)

Your Faithfully

(Fazal Badshah) Director Regruitmedt

20

Ammexer (

#### **Confidential**

Telephone: <u>92113563</u>

Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawar Cantt

No. KPK/PSC/SR-II. Dated

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Subject:

Rectt of Female SET/SST Science Group B-16 in Elementary & Secondary Education Deptt Peshawar

Dear Sir,

In continuation to this office letter No. <u>KPK/PSC/SR-II 013131</u> dated <u>02.01.2012</u> on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

S.No.	Name of Candidate	Domicile	35A # 1027/ Join
1.	Sarwat Jehan D/O Gul Rahman	Khyber Agy/1	7 SA #
2.	Robia Shams D/O Shams Ur Rahman	Mohmand Agy/1	
3.	Tahira Naz D/O Fazle Dayan	Mohmand Agy/1_	7 5 A NO - 1031 2019

2. Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

3. The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of the seniority.

4. Recommendation in favour of <u>92 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

5. Original application (with enclosure) of the above 03 recommendees are enclosed herewith for your record, please acknowledge receipt. 3.0

Ends: No. KPK-PSC-SR-II/\_\_\_\_\_ dated \_\_\_\_

Copy to: Director Elementary & Secondary Education Peshawar For Information

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<del>. S/E</del> & SI D. No pated .

Distagir Ahmad) rector Recruitment

Your Faithfully

(Ghulam Distagir Ahmad) Director Recruitment

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mner (H

Telephone: 92113563

Confidential /

Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawar Cantt

No. KPK/PSC/SR-II/

То

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education

Subject:

<u>Rectt of male SET/SST General Group B-16 in</u> Elementary & Secondary Education Deptt Peshawar

Dear Sir.

In continuation to this office letter No. <u>PSC SR-1/6588</u> dated <u>23.02.2012</u> on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

Ś.No.	Name of Candidate	Domicile
1.	Daulat Khan S/O Sher Ullahi	Mohmand Agy/I
2.	Gouhar Ali S/O Haji Said Ahmad	Khyber Agy/I
. 3.	Muhammad Naeem S/O Muhammad Saleem	Mohmand Agy/1 -+ 5. A NO- 961/20
.4.	Atta Ullah S/O Abdul Jabar	Mohmand Agy/1 -> 5 A NO - 970 2019
5.	Muhammad Nazir S/P Muhammad Jan	Bajawar Agy/I
6.	Gulzar Ahmad S/O Sher Aman Khan	Sawabi /2
7.	Qaazi Muhammad Irshad S/O Qaazi Fazal Rabi	Battagram/3
8.	Muhammad Sameen Shah S/O Dilawar Shah	Kohai/4

2. Recommendation in favour of the above 08 recommendees is provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

3. The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of the seniority.

4. Recommendation in favour of <u>41 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

5. Original application (with enclosure) of the above 08 recommendees are enclosed herewith for your record, please acknowledge receipt.

Your Faithfull

Ends: No. KPK-PSC-SR-II.

Copy to:

The Director, Elementary & Secondary Education Deptt: Peshawar For Information and necessary action please.

### **Confidential**

Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawar Cantt

tumer

No. KPK/PSC/SR-II/ Dated

Telephone: 92113563

То

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Subject:

Dear Sir,

Rectt of Female SET/SST General Group B-16 in Elementary & Secondary Education Deptt Peshawar

In continuation to this office letter No. KPK/PSC/SR-II 013131 dated 29.02.2012 on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

S.No.	Name of Candidate	Domicile	• • • • •
	Shazia Jan D/o Jan Afzai	MohmandAgy/1S.A	No-1030/2019
2.	Seema Mujahid D/o Mujahid Ali	MohmandAgy/1 SA	

Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. 3. The serial chronological order will not confer any right of the seniority.

4. Recommendation in favour of <u>02 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

5. Original application (with enclosure) of the above 02 recommendees are enclosed herewith for your record, please acknowledge receipt.

ξ

Ends: No. KPK-PSC-SR-II/

Copy to: Director Elementary & Secondary Education Peshawar For Information

\_\_ dated

Your Faithfully (hmad) utment

(Ghulam Distagir Ahmad) Director Recruitment

Telephone: <u>92113563</u>

Confidential

mai

Khyber Pathtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawar Cantt

No. KPK/PSC/SR-II/ Dated

То

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Subject:

Rectt of male SET/SST General Group B-16 in Elementary & Secondary Education Deptt Peshawar

Dear Sir,

In continuation to this office letter No. <u>PSC SR-I/6588</u> dated <u>23.02.2012</u> on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

S.No.	Name of Candidate	Domicile
1. +	Gul Hussain S/O Gul Habib	Bajauar Agy/1
2.	Fazli Raziq S/O Fazli Rabi	MohmandAgy/1 5 A No-967/2019
3.	Muhammad Qasim S/O Mukammil Shah	
4.	Shah Nawaz S/O Shah Nazar Khan	MohmandAgy/1_7SA NO-962/2619 MohmandAgy/1
5.	Fakhre Alam S/O Attah Ullah Khan	MohmandAgy/1
б.	Sirat Gul S/O Zar Gul Khan	S W Agy/1

2. Recommendation in favour of the above 06 recommendees is provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

3. The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of the seniority.

4. Recommendation in favour of <u>58 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

5: Original application (with enclosure) of the above 06 recommendees are enclosed herewith for your record, please acknowledge receipt.

dated

Your Faithfully

azal Badshah Director Recruitment

Ends: No. KPK-PSC-SR-II/

Copy to:

The Director, Elementary & Secondary Education Depti: Peshawar For Information and necessary action please.

Telephone 92113563

Confidential

Dated

Ammle (18

Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawar Cantt

No. KPK/PSC/SR-I

12012

Department Peshawar

Τo

Subject:

Dear Sir.

Rectt of Female SET/SST General Group B-16 in Elementary & Secondary Education Deptt Peshawar

The Secretary to Govt. of Khyber Pakhtunkhwa

Elementary & Secondary Education

In continuation to this office letter No. <u>KPK/PSC/SR-II 013131</u> dated <u>29.02.2012</u> on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

·		
S.N	o. Name of Candidate	Domicile
1.	Alia D/O Itbar Gul	Bajaur Agy/1
2.	Salma Jabeen D/O Abdul Ghaffar	Mohmand Agy/1
3.	Seema D/O Ikram Ud Din	Mohmand Agy/1-SA NO.975/201

2. Recommendation in favour of the recommendeesare provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

3. The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of the seniority.

4. I Recommendation in favour of <u>62 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

5. Original application (with enclosure) of the above 03 recommendees are enclosed herewith for your record, please acknowledge receipt.

Ends: No. KPK-PSC-SR-II/\_\_\_\_

Copy to: Director Elementary & Secondary Education Peshawar For Information

dated

Dateri 16

Govt: of Khyber Pakhtunkhwa  $[T]_{\mathcal{C}}$ Herry

Your Faithfully (Ghuam Distagir Ahmad) Director Recruitment

(Ghulam Distagir Ahmad) Director Recruitment

KHYBER PUKHTOOKHWA PUBLIC SERVICE COMMISSION 2 Fort Road, Peshawar Cantt, (Near Governor House) PH No. 9213563 Fax No. 9211795

REGISTRE

mnexel

No.K,P-PSC-DS45789 Dated:

010

To

Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Subject:-

<u>VERIFICATION OF MALE SST (G) BPS-16.</u> (ADVT: NO. 01/2009).

Memo:-

Reference your letter No. 3728F.NO.01/A-17 ADEO/ASDEO/SST(G)/M dated 12-06-2017 on the subject cited above to inform you that the following SST (G) have be checked with our Office record and found correct.

1. Muhammad Tariq S/O Sher Muhammad Mohmand Agency 1.

2. Muhammad Nacem S/O Maneen Khan Orakzai Agency 1.

3. Noor Muhammad S/O Muqeem Khan Orakzai Agency 1.

Copy Forwerded to..

1. PS to Secretary to Govt: of KPK Elementary & Secondary Education Peshawar.

Assistan tor-II

(Fazal Qayyum) Assistant Director-II

# BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

C.M. No.\_\_\_\_ of 2020 IN Service Appeal No.1014/2019

Appellant

....VERSUS....

Government of Khyber Pakhtunkhwa & 02 others ..... Respondents

S.#		ANNEX	PAGES	
1.	Application for placing on file with affidavit		1-2	
2.	KP PSC application form No.72208, dated: 12.02.2009		AA	3-7
3.	KP PSC interview call letter dated: 13.01.2011		BB	8
4.	KP PSC interview call letter dated: 04.01.2011	i	сс	9
5.	KP PSC interview call letter dated: 06.07.2011	*	DD	10
6.	KP PSC interview call letter dated: 16.11.2011	1	EE	11
7.	KP PSC recommendation dated: 27.02.2012		FF	12-13
8.	KP PSC recommendation dated: 06.01.2012	-	GG	14
9.	KP PSC recommendation dated: 11.05.2012		нн	15
10.	KP PSC recommendation dated: 12.02.2012	3 1 1	ll	16
11.	KP PSC recommendation dated: 18.06.2012	<i>i</i>	LL L	17
12.	KP PSC recommendation dated: 15.01.2012	 i	КК	18
13.	KP PSC verification of male SST (G), DATED: 23.08.2017	*	LL	19

# INDEX

Appellant/Applicant Through Amin ur Rehman Yusufza Sajjad Mehsud n 4 4 0 Khalld Khan Mohmand Karim Khan Afridi 8 Muaz Ashraf Khalil Advocates, Peshawar

Dated: 05.01.2021

# BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

: \$	Service Appeal No.10	14/2019
		18 18 18 18 18 18 18 18 18 18 18 18 18 1
Mst. Ishrat	Арре	llant 👘

of 2020

C.M. No.

IN

Government of Khyber Pakhtunkhwa & 02 others ..... Respondents

### APPLICATION FOR AND ON BEHALF OF APPELLANT FOR PLACING ON FILE:

- I. P PSC APPLICATION FORM NO.72208, DATED: 12.02.2009, (ANNEXED AT "AA")
- II. P PSC INTERVIEW CALL LETTER DATED: 13.01.2011 (ANNEXED AT "BB")
- III. P PSC INTERVIEW CALL LETTER DATED: 04.01.2011 (ANNEXED AT "CC")
- IV. P PSC INTERVIEW CALL LETTER DATED: 06.07.2011 (ANNEXED AT "DD")
- v. P PSC INTERVIEW CALL LETTER DATED: 16.11.2011 (ANNEXED AT "EE")
- vi. P PSC RECOMMENDATION DATED: 27.02.2012 (ANNEXED AT "FF")
- VII. P PSC RECOMMENDATION DATED: 06.01.2012 (ANNEXED AT "GG")
- VIII. P PSC RECOMMENDATION DATED: 11.05.2012 (ANNEXED AT "HH")
- IX. P PSC RECOMMENDATION DATED: 12.02.2012 (ANNEXED AT "II")
- x. P PSC RECOMMENDATION DATED: 18.06.2012 (ANNEXED AT "JJ")
- xi. P PSC RECOMMENDATION DATED: 15.01.2012 (ANNEXED AT "KK")
- XII. P PSC VERIFICATION OF MALE SST (G), DATED: 23.08.2017 (ANNEXED AT "LL")

EING ESSENTIAL FOR PROPER ASSITANCE OF THIS HON'BLE COURT AND JUST DECISION OF THE CASE.

#### <u>Respectfully Sheweth:</u>

- 1. That the titled appeal alongwith 39 others is pending adjudication before this Hon'ble Court and fixed today i.e. 12.01.2021, for onward proceedings.
- 2. That the Respondent Department submitted undated inquiry report, allegedly prepared by the Directorate of Education of the erstwhile FATA, in view whereof, appellants were directed to place on file the subject mentioned documents, hence the instant application.

It is therefore, most humbly prayed that on acceptance of instant application, the subject mentioned documents may ordered to be

NV	W.F.P. PUBLIC SERVICE COMMISSION	A)
PPLICATION N APPLICAT s. 285/- + Rs. 15 Total Rs.	FION FEE S/- Bank Charges Signature of Bank's Officer	
tisement NoO/_/	S. E.T 2009 12.	
ne in block letters her's Name in block letters	SHAKIR ULLAH ZARGAR	
Postal Address Permanent address, if different from 3(a) No. of National Identity Card	<u>Plo Ahallanai Mohmand Agency Toh. Ahallanai</u> <u>Colomy bazar Clo Khan wali general store</u> <u>os aboue</u> <u>21406-1745273-7</u>	
Telephone No.	Residence 0345 9161039. Office	
Date of birth as per Secondary School Certificate. Age on reckoning date	<u>4H April Minitees &amp; Seventy Seven</u> Year Month Days	
Place of birth, District/ Agency and Province. Nationality of your wife/ husband.	Mohmand Agency. Ghallamais Abakhil.	
District/Agency of your Domicile. Zone of your Domicile. Tick mark (~) the appropriate box (see details of Zone under Para 10 of Instruc- tions attached with this orm).	Mohmand Agency 12 3 4 5 M	X
Zone of domicile of your nusband (for married emale candidates).	12345]	

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*	3	· · ·		2	$\mathcal{W}$	
8.	Are you an ex-Service (Army, Navy & Air Forc mark the appropriate b	e, tick Yes	s No. If yes	s, attach Discharge	i Certificate.	
9.	Do you claim physical disability?	Yes	3 Not If yes	s, attach Medical C	ertificate.	
10	EXAMINATION CENTR Tick mark only one ce which you prefer.	ntre		RDAN	КОНАТ	D.I.KHAN
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<b>. 11</b> .	(a) Father's Occupati	on	He has be	con died		
12.	Married Female Candid (a) Name of Husband	· ·				
	(b) Date of Marriage.				and and a state	
13.	Answer the following, i	f vou have been a	broad.	н н <del>"</del>		
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	Detail of co-curricular a including sports & hob		Cric	cet		
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# QUALIFICATION STARTING WITH MATRICULATION EXAMINATION

Certificate / Diploma / -3 4 5 School / College / Degree / Postgraduate Year of Passing Marks obtained and Division and position Board / University Degree --- Institution as a whole or in Board / University, in parts. total Marks. Subject - if ist, 2nd or 3rd.-4. H. SS. Ahallanu Peshawar 1992 pot 51 850 Science Exame 1996-97 ler 💈 Peshawar Private Arts 502 1100 2 nd B-A Private Peshawar Arts 2000-01 2nd 550 Peshawar MA Private 2006. Pashto 2nd 1100 3 ed AL Khair University (ATK) AL Khair 589 2006 University (A) K inn 11100 ۲ case of your claim to an equivalent of the prescribed qualification, state if it is recognized by the University Grants Commission. Add. Syllabi of the Examination. Copy of Detailed Marks Certificate.

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# REGISTERED AMMER ADDRESS ALL YOUR CORRESPONDENCE TO THE SECRETARY, N.W.F.P. PUBLIC SERVICE COMMISSION 2-FORT ROAD, PESHAWAR CANTT.

SA No-968/2019

BB

03237

Telephone: 9213563, 9213750, 9214131, 9212897)

U.Go) Abdul Malik sto said muhan A shah То Abdul Malik villade Mookilig Prand Ghar clo Lal Din shop Keeper wawa Khan Market colles s

No

Dated

Subject:

S-E.

With reference to your application for the above post, you are required in the Commission's Office at 2-Fort Road, Peshawar Cantt. (Near Governor House) at 08:30 - 1 4 \_\_for oral test (interview). Please bring origination 'n a.m oń. certificates, degrees and testimonials which will be returned to you on conclusion of your interview.

You should rectify the following deficiencies failing which the Commission will reject 2. your application and shall not interview you for the above post:

(a) (b) (c) (d) (e) Superintendent SAPD INVEP 2391--PSC-40.000 Nos-02.09.09[PSC/Call

SA NO- 10/0/2019 Ammerica C REGISTERED ADDRESS ALL YOUR CORRESPONDENCE TO THE SECRETARY, N.W.F.P. PUBLIC SERVICE COMMISSION 2-FORT ROAD, PESHAWAR CANTT. Telephone: 9213563, 9213750, 9214131, 9212897) 01349 Dated To Ali Malik Molith ALVC. Subject: 1. With reference to your application for the above post, you are required in the Commission's Office at 2-Fort Road, Peshawar Cantt. (Near Governor House) at 08:36 17 = H - 9 - 2011 for oral test (interview). Please bring original am on\_ certificates, degrees and testimonials which will be returned to you on conclusion of your interview. You should rectify the following deficiencies failing which the Commission will reject 2. your application and shall not interview you for the above post: lu to ) esice (a)(b) (c) 1 (d) (e) Superintendent

SA # 9651/ 201 REGISTERED KHYBER PUKHTOONKHWA ю.К.P-PSC-DS/-U40312 PUBLIC SERVICE COMMISSION 2 Fort Road, Peshawar Cantt, (Near Governor Dated: PH No. 9213563 Fax No. 9211795

Kifayat Ullah S/O Rahim Ullah Vill: & P/O Qasmi (Madad Khan Banda) Tehsil Takht Bhai Distt: Mardan 👾

House)

To

#### RECT: OF MALE SENIOR ENGLISH TEACHER (SCIENCE) (B-16) IN Subject: -SCHOOL AND LITERACY DEPARTMENT.

-In-response to your application for the subject cited post, you are required in the Commission's Office at 2 Fort Road, Peshawar Cantt, Near Governor House at 08:30 a.m. hours on 29/07/2011 for interview. Please bring original certificates, degrees and testimonials that will be returned on conclusion of your interview.

You should rectify the following deficiencies three days before interview positively 2. failing which the Commission will reject your application and shall not interview you for the above post: -

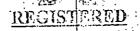
Departmental Permission Certificate.

All DMC's before three days of interview. R С Photocopy of Matric, F.A Certificate. Photocopy of B.A/B.Sc,M.A/MSc/ Bed /Med. Original Degree. Character Certificate from Two responsible Ε persons Character Certificate last attended Institution.

Domicile Certificate/Attested Photo

Note :- Result of your interview will be displayed at our website WWW.NWFPPSC.gov.Pk very soon after the last date of the interview.

SUPERINTENDER



# N.W.F.P PUBLIC SERVICE COMMISION, PESHAWAR 2-FORT ROAD NEAR GOVERNOR HOUSE PESHAWR CANTT

St 0 I

Nelephone: <u>9213563</u> 105. <u>5,414</u> Dated: <u>4641</u> Sich

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Contraction of the Basic Sto H. Gul Shar khan Signal Tehsil & Plo Deraziona FR D.I.Than

# Contactor Art Friday 18

With reference to your application in the above past, you are required in the Commission's Office at 2-Fort Road, (Near Governor House) at 8:30 a.m. on Linear for oral lest (interview). Please bring original certificate degree and lestimation of you interview.

You should rectify the following ticked deficiencies failing which the Commission will reject your application and shall not interview you for the above post-

(a) <u>Attested Photo Copies of Matric</u> <u>A/F Se/D.Com original certificates</u>

(b) Attested Photo Copy of P. A/M A M.Sc/N.Com/MBA/MEd/ B.Ed original degrees

(c) Departmental Permission Certificate from competent authority

(d) Allested Photo copy of your dor infector tifficater N.I.C.

(c) Three attesned photographs

(!) Attested Photoconies of all DIAC

(g) Attested photocopy of Character Certificate (Last attended institute/Two reponsibale persons)

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Electrone: 221/2563



Khyber Pskhtunkhwa Rublic Service Commission Perthawar 2-Fog Road Near Governor Houzo Peansarar Centt 2.50 No. BRIVPSCISR-IU

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21959 Datel 5105

The Secretary to Gove of Khyber Pakhtinkhwa Elementary & Secondary Education Department Peshawar

> Subject 11

Detr Sir,

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Rectt of Female SETIST Science Crean P-1519 Elementary & Secondary Edvention Depit Pethaner

In continuation to this office letter No. KeKrSCSR-II 013131 dued 02.01.2012 on the subject noted abe e and to state that the Commission recommends the fellowing to the government for appointment.

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Confidential

Name of Candi, tate Sarwal Jehan D/O Gul Rahman Domicile Ī +c//.col # A≈r Robia Shanis DVO Shams Ur Raliman Kiyber ABVII --2 . I Tahira Naz DVO Fazle Duyan Marmand Agy 3. • i Mphinesd Agyl 1201-011 22 4 Recommendation in favour of the recommenders are provisional subject to their medical fitness and 2, verification of documents / domicile by the Education Dept. ٤ The inter-se-Merit of the recommendees will be communicated on Snalization of all the pending cases. The serial chronological order will not confer any right of the seconity. Recommendation in favour of 22 Penders Crees shall be conveyed after clearance of their vitals \$ deficiencies Original application (with enclosure) of the above 03 recommendees are enclosed herewith for your 5. segret plesse seknowledge receipt. Your Faittfully

Ends No KPK-PSC-SR-II/-

Copy 14: Director Elementary & Secondary Education Peakawar

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A.SE & FL  $\mathbf{D}$ , No Dated .

ittagir Ahmad) Requisment ntra

(Giulan Dizagir Ahmed) Diroctor Recruitment

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Confidential

Khyber Pakhtunkhwa Public Service Commissio 1 Peshawar e Peshawar Canti Ηοί 2-Fort Road Near Governor

m

No<sup>H</sup>KPK/PSC/SR Da ed

Telephone. 92113563

Τo

Subject:

Dear Sir.

З.

urt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department Date ...... 2.3/

相關

Department Peshawar Rectt of male SET/SST General Group B-16 in Elementary & Secondary Education Deptt Peshawar

The Secretary to Govt. of Khyber Pakhtunkhwa

Elementary & Secondary Education

In continuation to this office letter No. PSC SR-1/6588\_dated 23.02.2012 on the subject noted ission recommends the following to the government for appointment:

shove and to state th	hat the C	commission recommends the jonowing to an o	Domicile	
	No.	Name of Candidate		
		tikhar Ali S/O Meer Salam Khan	F.R Bunno /I	1012 12AK
. 1.	If	tikhar AH S/O IVICEI Salah AH	F.R.D.1 Khan /1	SA NO- 1013/294
2.	A	bdul Baseer S/O Gulshan Khan	Mohmand Agency /1	SA NO - 968 2210
		Abdul Malik S/O Said Muhammad		
1 3.	·	Muhammad Farooq S/O Muhammad Yousafi	Mohmand Agency /1	
4.			Mohmand Agency /1	BA NO- 7001-01.
15		Yar Khan S/O Ali Rahman	All Hand Acaboy /1	SA NO- 963/2019
		Zafar Iqbal S/O Gul Rahman 1		
A	5. Z	Hazrat Ali S/O Muhammad Qamar	Charasadda /2	
17	· .		Nowshehra /2	
5	8.	Diyar Ali S/O Sabz Ali.	1 · 1 <u>1</u>	
	<del></del>	Falak Naaz S/O Sher Badshah 1	Peshawar /2	
!			Mardan /2	
. ۲	10.	Sabir Ali S/Q Rahman Ullah	Mardan /2	
$\vdash$	11.	Murad Ali S/O Ali Haider		
		Khan Muhammad S/O Wazir Nuhammad	Chatral /3	
•	12.	Ninit Fred S/O Namir Gul	Malakand /3	
F I	13.	Muhammad Iqbal S/O Namir Gul	Buner/3	
	14.	Mahir Zada S/O Said Zareen		
:		Naveed Husain S/O Bakhtpoor Khan	Dir /3	ASE & SE
· ·	15.		Swabi Gadoon /3	910
	16.	Saeed Khan S/O Ziarat Khan	Tank {4	28.20
	17.	Rahmat Ullah S/O Rageem Khan		
		Muhammad Ilyas S/O Muhammad Roshan	Banny /4	1 March
	18.	Withanning and the second tempo	D.i.Khan/4	I I Harridge 1
	19.	Munir Ahmad S/O Muhammad Usman	.Karak/4	- NIXADA
	20.	Noor Muhammad Khan S/O Nawaz Khan		-1   KAM 1/1
		Sail Ur Rahman S/O Gul Marjan	L/Marwat /4	I Franker.
	21.	Sait Ur Kannan G/O Gur Husse		- · · · · · · · · · · · · · · · · · · ·
· .	L		1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	· · · · · · · · · · · · · · · · · · ·

Recommendation in favour of the above 21 recommendees is provisional subject to their medical fitness and verification of documents / domicile by the Education Depit.

The inter-se-Merit of the recommendees will be communicated on finalization of all the pending 1

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Telephone: <u>92113563</u>

<u>Confidential</u>

Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House, Peshawar Cantt

fmmexer

No. KPK/PSC/SR Date

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Rectt of Female SET/SST Science Group B-

Subject:

Dear Sir,

Elementary & Secondary Education Deptt Peshawar

In continuation to this office letter No. <u>KPK/PSC/SR-II 013131</u> dated <u>02.01.2012</u> on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

6 in

S.No.	Name of Candidate	Domicile
1.	Sarwat Jehan D/O Gul Rahman	Domicile           Kulyber Agy/1
2.	Robia Shams D/O Shams Ur Rahman	Mohmand Agy/l
3.	Tahira Naz D/O Fazle Dayan	Mphmand Agy/1 - 7 S A Mo - 1031 201

Your Faithfully

)istagir Ahmad) Recruitment

2. Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

3. The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of the seniority.

4. Recommendation in favour of <u>92 Pending Cases</u> shall be conveyed after clearance of their vitals, deficiencies.

5. Original application (with enclosure) of the above 03 recommendees are enclosed herewith for your record. please acknowledge receipt.

Ends: No. KPK-PSC-SR-II/ dated

Copy to: Director Elementary & Secondary Education Peshawar For Information

A-87E & SH (Ghulam Distagir Ahmad) n. No Director Recruitment Dated BVE thur. £γ 1.11

Confidential

Telephone: 92113563



Khyber Pakhtunkhwa Public Service Comm

Peshawar 2-Fort Road Near Governor House Peshawar Cantt

Immer (

KPK/PSC/SR-II/ 5-12012

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Subject:

Rectt of male SET/SST General Group B-16 in Elementary & Secondary Education Dept Peshawar

Dear Sir,

In continuation to this office letter No. PSC SR-1/6588 dated 23.02.2012 on the subject noted above and to state

S.No.	Name of Candi	date	· · · ·	ri 1	Domicile	Ţ		· ·
<u>∣⊺.</u>	Daulat Khan S/O Sher Ullahi	· · ·	······································	М	phmand Agy/1		1	
2.	Gouhar Ali S/O Haji Said Ahma	ad			hyber Agy/1	•	· ·	•
3.	Muhammad Naeem S/O Muhar	mmad	Saleem	M,	phmand Agy/I' -	SA NO.	-961	120
.4.	Atta Ullah S/O Abdul Jabar			١M	ohmand Agy/i	SA NO-	9701	2010
5,	Muhammad Nazir S/P Muham	mad	làn		ajawar 'Agy/I		94 - 1 1 3	
6.	Gulzar Ahmad S/O Sher Aman	Khan		Śą	wabi /2		•••••	•.
7.	Qaazi Muhammad Irshad S/O P			B	ttagram/3		•	•
8.	Muhammad Sameen Shah S/O	Dilaw	ar Shah	K	phat/4 .	••••••	•	

Recommendation in favour of the above 08 recommendees is provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. 3. The serial chronological order will not confer any right of the seniority.

Recommendation in favour of <u>41 Pending Cases</u> shall be conveyed after clearance of their vitals 4. deficiencies.

Original application (with enclosure) of the above 08 recommendees are enclosed herewith for your 5. record, please acknowledge receipt.

dated

'our Faithfully Recruith

Ends: No. KPK-PSC-SR-II

Copy to:

The Director, Elementary & Secondary Education Deptt. Peshawar For Information and necessary action please.

#### <u>Confidential</u>

Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawar Cantt

Ameri

No. KPK/PSC/SR-II/

*4*2012

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

#### Rectt of Female SET/SST General Group B-16 in Elementary & Secondary Education Deptt Peshawar

#### Dear Sir,

Subject:

Τo

Telephone: <u>92113563</u>

In continuation to this office letter No. KPK/PSC/SR-II 013131 dated 29.02.2012 on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

S:No.	Name of Candidate			Domicile.
1.	Shazia Jan D/o Jan Afzal		2	MohmandAgy/1
2.	Seema Mujahid D/o Mujahid Ali	۱. ۲.		MohmandAgy/1_ + SA No. 1033 201
L		i		그렇게 나는 것 같아요. 정말 나는 말을 다 못했다. 가만 가면

Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. з. The serial chronological order will not confer any right of the seniority.

Recommendation in favour of 02 Pending Cases shall be conveyed after clearance of their vitals 4. deficiencies.

Original application (with enclosure) of the above 02 recommendees are enclosed herewith for your record, please acknowledge receipt.

-5.

Ends: No. KPK-PSC-SR-II/

Copy to: Director Elementary & Secondary Education Peshawar For Information

dated

our Faithfully Ahmad) (Ghu uitment

(Ghulam Distagir Ahmad) Director Recruitment

Carfedential 14 00 Kåyber Pakhtunkliwa Public Service Commission Prebawar 2-Fort Bogd Near Governor House Persawar Cana Not KEK PSCSR-IV 7623 Dafed\_ 7162 J N oT 1 is Sectory to Gove of Khyber Pekitunkhwa Etyremany & Secondary Educidon Ouportment Peshawar Real (Emale SETISNT General Group Beloin Subject: 1 Emeritars & Secondary Education Denti Perhawat Dear Sit, In extinution to this office ferrer No. PSC \$1140388, dreed 23,02,2012 on the subject noted above and to state that the Counsistiut recommends the following to the government for appointments-5 10 1. Name of Candidate Domicite \_ŧ T VILL Hat SO Gul Habin States and Bajauar Agyit Hart Farng S/O Farli Rabi Æ Mommad Agy 1 - 9 6 7 / 2019 M instanted Qusim S/O Multampril Si 1 Michmand Azvil 454 HI- 962 / 249 1 Plac POP- SH AZ + INSALASMAN Fickture Altern S/O Attah Ullah iQhan 3. F.R Bannul 2 Sind Garso Zar Oul Khan S.W Agyl Recommendance in favour of the above 06 recommendees is provisional subject to their medical "Viness and ventication of dr. uncerts / domicile by the Education Deptr. The inter-se-Mey 5 of the recommendees will be communicated on finalization of all the perioding cases. 3. it he sected claronological orde will may confer any right of the sentority, Recoil normality in favour of 53; Pending Cases shall be conveyed after clearance of their vitais 1.1 .z∋ians-bitel<sup>g</sup>l .s : Original application (with enclosure) of the attove 96 recommendees are enclosed herewith for your 1 \* record, please actinow laring receipt. - { Your Faithfully तेब्रतराज्य १३४ Director Recruiteday Ends: No. KPK-PSC-SR-ID tated: C 29 10: The Director, Elementary & Secondary Education Deptt: Peshawar For information and necessary serion please, · · · (Director Recruitment) ۳... د . . .

سۇ

-

Telephone: <u>92113563</u>

Ίo

Subject:

Dear Sir,

### Confidential



Khyber Pakhtunkhwa Public Service Commission Peshawar 2-Fort Road Near Governor House Peshawai Cantt

Amala

No. KEK/PSC/SR-1111998 2 adum

Dated \_\_\_\_\_/2012

The Secretary to Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar

Rectt of Female SET/SST General Group B-1d in Elementary & Secondary Education Deptt Peshawar

In continuation to this office letter No. <u>KPK/PSC/SR-II 013131</u> dated <u>29.02.2012</u> on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

		-	=			
S.No.	Name of Candida	ie	<u></u>	T	Domicile	1 i··
1.	Alia D/O Itbar Gul		1	Baja	r Agy/1	
2.	Salma Jabeen D/O Abdul Ghaffar	1 .	<u>+</u>	'Mohi	nand Agy/1.	
3.	Seema D/O Ikram Ud Din	1	1	Mohi	nand Agy/I	S
		1	<u>†                                    </u>		i	· •

2. Recommendation in favour of the recommendeesare provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.

The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of the seniority.

4. 1 Recommendation in favour of <u>62 Pending Cases</u> shall be conveyed after clearance of their vitals deficiencies.

Original application (with enclosure) of the above 03 recommendees are enclosed herewith for your 5. record, please acknowledge receipt.

Ends: No. KPK-PSC-SR-II/\_\_\_

Copy to: Director Elementary & Secondary Education Peshawar. For Information

dated

A.3. 5. No 14 Deleci 1621

Govi: of Khyber Pakhinakhwa 肥肥 

2641 -1-10

our Faithfully (Gh igir Ahmad) uitment

(Ghulam Distagir Ahmad) Director Recruitment

mnext REGISTRED



No.K,P-PSC-DSA578

Dated: 2

Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Subject:-

House)

Ъo

PH No. 9213563 Fax No. 9211795

KHYBER PUKHTOOKHWA

PUBLIC SERVICE COMMISSION 2 Fort Road, Peshawar Cantt, (Near Governor

> VERIFICATION OF MALE SST (G) BPS (ADVT; NO. 01/2009).

Memo:-

Reference your letter No. 3728F.NO.01/A+17 ADEO/ASDEO/SST(G)/M dated 12-06-2017 on the subject cited above to inform you that the following SST (G) have be checked with our Office record and found correct.

- 1. Muhammad Tariq S/O Sher Muhammad Mohmand Agency 1.
- 2. Muhammad Naeem S/O Maneen Khan Orakzai Agency 1.
- 3. Noor Muhammad S/O Mugeem Khan Orakzai Agency 1.

. Copy Forwerded to ...

(Fazal Qayyum) Assistant Director-I

1. PS to Secretary to Govt: of KPK Elementary & Secondary Education Peshawa

## Fresh Enquiry Report

### About

### Directly inducted/Suspected Secondary School Teachers (SSTS) in FATA

# Directorate of Education FATA FATA Secretariat Warsak Road Peshawar

Bγ

#### INQUIRY REPORT ABOUT DIRECTLY INDUCTED / SUSPECTED SECONDARY SCHOOL TEACHERS (SSTs) IN FATA

#### INTRODUCTION:

The Secondary School Teachers (SST)'previously known as SET are the backbone of the Secondary level of Education in the Public Sector Schools i.e. Middle, High & Higher Secondary, they are usually appointed/recruited through departmental promotion committeeOR through Public Service Commission. It would be appropriate to elaborate that SST (BS-16) is provincial cadre post and the Director Elementary & Secondary Education Khyber Pakhtunkhwa is appointing authority for appointment against the post of SST (BS-16) both in Khyber Pakhtunkhwa and FATA, while Director Education FATA is only limited to the adjustment of the SSTs whose services are placed at the disposal of Director Education FATA for further posting in various Agencies / FRs of FATA.Previously as per recruitment policy, 50% SSTs are directly recruited/ appointed through Public Service Commission, whereas, 50% are through Departmental Promotion Committee from different teaching cadre. While now as ber existing policy the promotion share is 75% of various teaching cadre, and 25% is through initial recruitment(Annex-A). Recruitment of SSTs were lastly made through Public Service Commission in 2012while in 2008 SSTs were recruited on adhoc/contract basis and then regularized.

#### Background

In the 1<sup>st</sup>quarter of 2016, there were rumors/reports/complaintscontinuously received in the Directorate of Education FATA, from various quarters that various numbers of SSTs/SETs have been inducted in the system and working in differentAgencies/FR's of FATA, without adopting the proper recommendations from Khyber Pakhtunkhwa, Public Service Commission norrecommended by the Departmental promotion committees. Responding positively to the call of hour, the Director Education FATA immediately assigned the task to two Assistant Directors namely Muhammad Kashif and Muhammdullah to check credentials of all the SSTs working in FATA and cross match their appointment and selection order with the record of the Directorate of Elementary & Secondary Education and Public Service Commission Khyber Paktunkhwa.

The two Assistant Directors of the Directorate of Education FATA asked all the Agency Education Officers in FATA to furnish complete credentials of all the existing SSTs working in their respective areas of administrative control. Subsequent to cross checking with the record of the Public Service Commission Khyber Pakhtunkhwa and Directorate of Elementary & Secondary Education Khyber Pakhtunkwa , 158 SSTs working in FATA were declared as grey/suspected and recommended to hold in-depth investigation and probing

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against them(Annex-B).

Responding to the recommendations of the above said inquiry committee Enter high level inquiry Committee under the chairmanship of the Director Education FATA ass constituted with the approval of the Additional Chief Secretary FATA to conduct inquiry under the enclosed TORs at (Annex-C). The inquiry Committee after a lot of meetings and correspondence with quarters concerned has prepared report signed by the three (03) members including chairman. In meantime NAB Khyber Pakhtunkhwa also intervened in the instant issue/case and asked for submission for the inquiry report to NAB office.

When report submitted signed by three (3)member to NAB, a controversy aroused in the verified list of SST, provided by this office and that provided by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa. As the lists of verified SSTs received to this office under the covering memo, in response to this office letters were denied / disowned by Directorate of Elementary & Secondary Education and this made the issue further deteriorated. Further in a meeting held in NAB office on 8.2.2018 attended by all members of the committee, subsequently it was decided to conduct a fresh enquiry in the instant case, by asking Public Service Commission and Directorate of Elementary and Secondary Education Department Khyber Pakhtunkhwa for provision the list, they recommended and they promoted / recruited on adhoc / contract basis and later regularized.

#### PROCEDURE

Now to proceed as per a new directives of the Enquiry Officer NAB KPK Peshawar a meeting of the Enquiry Committee was held at Directorate of Education FATA Peshawar on dated 12:2.2018 and it was decided to bifurcate all 158 SSTs into three categoriesi.e.

#### Category-1

Those who were appointed on the recommendations of Public Service Commission KPK. Category-II

Those who were appointed on contract basis and later on regularized by Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa.

#### Category-III

Those who were either appointed batch-wise alongwith those who were promoted by the DPC. After categorization a list of ninety seven (97) SSTs were sent to Public Service Commission Khyber Pakhtunkhwa with the remarks to kindly verify that whether they are recommended by it's office vide this office letter No. 2448 dated 12.2.2018, No. 2620 dated 14.2.2018 and No. 2805 dated 19.2.2018 respectively(Annex-D-E-F).

While the list of those SSTs who were either appointed through contract basis and later on regularized or through DPC or batch-wise was submitted to Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa vide this office letter No. 2479 dated 13.2.2018 and No. 2489 dated 13.2.2018 respectively(Annex-G-H).

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		Zebən Shəh	GulBahadar	this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for appti as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for apptt as SST (G) reported to		1981年5月19日4月
	60		-1 -1-	this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for appti as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for apptt as SST (G) reported to this office videletterNo.		exonerated 1
	60	Zebən Shəh	GulBahadar	this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 61 (G) Recommended by PSC for appti as SST (G) reported to this office videletterNo. PCS/SR/II/ 04034 dated 21.2.2018 at S. No. 200 (G) Recommended by PSC for apptt as SST (G) reported to		exonerated 1

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·				apptt as SST (Sc) reported to		a Mavberson	
,		A the survey of Cult	SawabGul	this office videletterNo.		Nevonerated St	
<del>5</del> 7-	. 64	Muhammad Gul	SawabGui				•
-	, ,	: :		PCS/SR/II/ 04034 dated			· · ·
				21.2.2018 at S. No. 3 (Sc)	•		
				(Disable)	· • •		
58				Recommended by PSC in		May be set	<u>د</u> د
58 .	68	Sajidullah	Balhi Khan			exonerated	
				the light of court order			•
	/.			vide at S. No. 277			• •
591	69	Abdul Hai	Muhammad	•	······································	Fake /	on low
			Tayyab			directly inducted as	SALOY
						no record is	
	:. <sup>•</sup>					available with '	
						KPK as reported vide	• • •
			:	•• -		letter No.	: .
			· _v · ***			2811 file No.	•••
	·		·* .			1 SST (M) FATA/NAB	
					•	Inquiry dt	vi : • •
	· ·				Only regularization order is	16.2.2018	
			·			false (	
60	73	Hizran Begum	Muhammad		available, no apptt order	Fake /	•
			Roshan		(Contract) reported to this	directly	
					office vide letter No.3016/A-	inducted	•
•					17/SST (F) general casesdt		:
			• •		19.2.2018 at S. # 7 <sup>.</sup>	· -	
- 			· · ·			/ Fake /	
, 61 1	74 -	TahiraNaz	Fazal Dayan			X directly	•
ſ						inducted	•
· ·			•			Fake /	. شېښې د بېرې
62		Compared by the second	Cullert		/ `	· directly	
	.75	SarwatJehan	GulRahman		,	inducted	
1						mouced	
				Recommended by PSC for			
\$ 				apptt as SST (Sc) reported to		May be the	
- 63	76	lmtiazMukhtar	Mukhtar	this office videletterNo.		clexonerated	
		(Female)	Ahimad	PCS/SR/II/ 04034 dated			
		, .		21.2.2018 at S. No. 21 (Sc)	· ·		
· i					1. · · ·	Fake /	
64	77	Ishrat	BahadarSher			directly	
1						inducted	
1	ļ				· · · · · · · · · · · · · · · · · · ·	Fake /	
+ 65						directly	
	78	Ghazala Sana	Sanaullah				
	1 <u>;</u> ·	· · ·				inducted	ŀ .
	<u>.</u>			the stranger from		Fake /	
ĴĻ	79	Alia Taj	Tajud Din		1	directly	·
•* •	ŀ	· .	1	/ X	¥/	inducted	·
•	÷			1 1/1	ή <u> </u>	Fake /	
·•7 .	81	Seema	Ikram-ud-Din	M		directly	
	. 91	1			**		1

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÷	್ಷ ಕ್ಷೇತ್ರ ಕ್ಷಾತ್ರ ಕ್ಷೇತ್ರ ಕ್ಷಾತ್ರ ಕ್ಷತ್ರ ಕ್ಷತ್ರ ಕ್ಷತ್ರ ಕ್ಷತ್ರ ಕ್ಷತಾತ ಕ್ಷತಾತ್ರ ಕ್ಷತಾತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷತಾತ ಕ್ಷತಾತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷತ ಕ್ಷ			•	- ·	
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			1		, <u>1</u>	
		·	· .	<u> </u>		inducted
				· · · · · · · · · · · · · · · · · · ·		
						Fake /
36	82	Asma	Muhammad			directly
			Akbar		<u>.</u>	inducted
 					Only regularization order is	Fake /
				· .	available, no apptt order	directlý
69	.83	NudratAfshan	Muhammad	· .	(Contract) reported to this	inducted
			Sharif		office vide letter No.3016/A-	
			51.0111 · ·	·	17/SST (F) general casesdt	
					19.2.2018 at S. # 20	
					Verified/ owned by E&SE KP	
.			-			Mayibe
					as appointed through DSC	and the second second second
.70	7/L-II	Gul Salam	Abdul Matin		reported to this office vide	exonerated
			,×		letter No. 2811 file no. 1	
				· · · · ·	SST(M) FATA/NAB enquiry	
	•		· · · ·		dated 16.2.2018	
			··	· · · · · · · · · · · · · · · · · · ·		Fake /
-71	• 8/Ļ-11	Zafarlqbal	GulRahman	· · · · · · · · · · · · · · · · · · ·		directly
						inducted ·
			·			Fake /
72	9/L-11	Abdul Malik	Said -		1	directly
			Muhammad			inducted
<u> </u>	1			· · · · · · · · · · · · · · · · · · ·		Fake /
73	10,4L-II .	Muhammad	Muhammad		$\mathcal{M}$	directly
	10,011.	Farooq	Yousaf			inducted
-' 	<u></u>		100381		· · / /	Fake /
- 74	11/L-II	Shakirullah	Zargar			directly
				neen oo haan hara kara kara kara kara kara kara kara		Fake /
75	12/L-II	Hazrat Jan	Akhtar Jan			directly
						inducted
				Recommended by PSC for		法在建立管理
				apptt as SST (Sc) reported to		May be 1
7.6	137L-IF	Muhammad Anwar	Hazrat Zamin	this office videletterNo.		exonerated:
				PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 21 (Sc)		
			. /		*	Fake /
·····	1/1-11	Muhammad Suhail	GhunchaGul			directly
						inducted
	· ·				· · ·	Fake /·
78	2/L-111	Shah Nawaz Khan	Shah Nazar		1	directly .
			(			inducted
с.ri¥	BER AGEN		· · ·		Val fa	L* 202
				Recommended by PSC for	V M.	
			1	apptt as SST (G) reported to this office videletterNo.	1 M	May be
:79	84	Tikka Shah	Haji Shanak	PCS/SR/II/04034 dated	V//	exonerated
	:	· · ·	<u> </u>	21.2.2018 at S. No. 4 (G)	11	Descore

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	<u> </u>				<u> </u>	
1			/	Disable ·		
				Recommended by PSC for		
		· '.		apptt as SST (Sc) reported to		A Mayibe 2 h
20	87	Amīr Zeb	Abdullah	this office videletterNo.		sexonerated
				PCS/SR/II/ 04034 dated		
	· · .		· ·	21.2.2018 at S. No. 11 (Sc)		
				Recommended by PSC for		
				apptt as SST (G) reported to	·	Mayberry
81	. 90	Aman Akbar	Khan, Ákbar	this office videletterNo.	1	A exonerated at
			(indry/ikod)	PCS/SR/II/ 04034 dated		
			-	21.2.2018 at S. No. 25 (G)		
				Recommended by PSC for		
	·					
::				apptt as SST (G) reported to		ce May berest
82	94 .	Ali Khan	Wali Khan	this office videletterNo.		As exonerated :
:				PCS/SR/II/ 04034 dated		
			. 1	21.2.2018 at S. No. 24 (G)	١	
				Recommended by PSC for	•	
			• .	apptt as SST (G) reported to	- 15 - 160 - <sup>-</sup> 16660. -	Maybe
83	98	Safia Begum	Tahir Shah	this office videletterNo.		vexonerated
				PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 38 (G)	$\sim$	
				Recommended by PSC for		
				apptt as SST (Sc) reported to		Mayibe Sara
84	99	ShaziaAyub	Ayub/Khan	this office videletterNo.	: · · · · · · ·	Liexonerated
•				PCS/SR/II/ 04034 · dated		
				21.2.2018 at S. No. 18 (Sc)	/ /	
<u>_```</u>	•		<u> </u>			Fake /
	100	Sumaira	Khan Bahadar			directly
85			· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	inducted
				<u> </u>	· · · · · · · · · · · · · · · · · · ·	
86						Fake /
	.14/1-11	FazieHaleem	KamilHussain		· •	directly
	• • •			• •	· · · · · · · · · · · · · · · · · · ·	inducted
					Verified / owned by E&SE KP	
21 <sup>1</sup> 2					as appointed through batch	
: .		··: ·			wise / year wise merit	May be and
.87	15/L-II '	Said Bahadar	Khan Bahadar		appointment reported to this	Siexonerateda
· · ,			· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	office vide letter No. 2811 file	
					no. 1 SST(M) FATA/NAB	
	••••				enquiry dated 16.2.2018	
32	16/1-11	Muhammad	Muhammad	· ·		Fake /
•••		Naeem	Saleem			directly inducted
89	.17/L-II	Attaullah	Abdul Jabbar			Fake /
•					1	directly inducted
90	18/L-II	Gohar Ali	Haji Said	Recommended by PSC for	/ X/	
1		1	Ahmad	Appointment as SST (G)	/ //	May beics
•			7	reported to this office vide at S. No. 51		exonerated.
• 2	) <u>`</u>	l	<u> </u>	J. (10. JI	·/	Townships of statements

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		· · · · · · · · · · · · · · · · · · ·		•		
					Only regularization order is	Fake /
					available, no apptt order	directly
91	19/L-II	Zubaida Amir	Amir Khan		(Contract) reported to this	inducted
					office vide letter No.3016/A-	
					17/SST (F) general casesdt	· ·
					19.2.2018 at S. # 21	
I ORAK	ZAI AGEN			······		
		•				· · ·
				Recommended by PSC for		
		4	1	apptt as SST (G) reported to	i.	seremay be used
92	105	Syed AjbarHussain	Syed Imam	this office videletterNo.		vexoneratedre
*			Taqi	PCS/SR/II/ 04034 dated		
•				21.2.2018 at 5. No. 182 (G)	•	
·				Recommended by PSC for	·	
		•		apptt as SST (G) reported to		
93	106	Abdul Qayum	Saadullah	this office videletterNo.	• • • • • * <u>*</u>	evonerated
· · · · · · · · · · · · · · · · · · ·	100	Abdul Qayum	Khan	PCS/SR/II/ 04034 dated		
	•			21=2.2018 at S. No. 11 (G)	1	
. <u> </u>			/		· · · · · · · · · · · · · · · · · · ·	
				Recommended by PSC for		
				apptt as SST (G) reported to		
- 94	108	Abdul Hameed	GulSarwar	this office videletterNo.	Y	Alexonerated a
			•	PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 3 (G)		
				Recommended by PSC for		
			1	apptt as SST (G) reported to		na, Maybeld, J
95	109	Muhammad Rauf	Walimat Shah	this office videletterNo.		s texonerated
		Khan		PCS/SR/II/ 04034 dated		
_				21.2.2018 at S. No. 119 (G)		
· · · ·				Recommended by PSC for	n de la compañía de la compañía de la compañía de la compañía de la compañía de la compañía de la compañía de l La compañía de la comp	
l' · · · · ·				apptt as SST (Sc) reported to		M-AMayloe714
96	110	Muhammad	Hamid Gul	this office videletterNo.		siexoneratedits
		Abdullah		PCS/SR/II/ 04034 dated		
			1	21.2.2018 at S. No. 2 (Sc)	¥.	
				(Disable)		
• 1 • • • • • • • • • •					·	
				Recommended by PSC for	· ·	
				apptt as SST (G) reported to		Eserviay.bese
. 97	127	NažiaAzmin	Abdul .	this office videletterNo:	n an	exonerated is
• •			Waheed	PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 33 (G)		
-			1	Recommended by PSC for		
				apptt as SST (Sc) reported to		May ber
				this office videletterNo.		STREAM PROFESSION
98	1/1-11	Saifullah	Zahir Shah	PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 61 (Sc)		
: :99	. · · · · · · · · · · · · · · · · · · ·	Mst.HajiraHussain	Faqir	Recommended by PSC KPK	1/ 1//	
			Muhammad	as per 2005 advertisement		May be
		· .	INCOMPANY AND		/	exonerated

	an an an an an an an an an an an an an a					
ر مرجع المرجع	<i>م</i> ه د ب	<u> </u>				· · · · · · · · · · · · · · · · · · · ·
- 50	3/1.41	Muhammad Qasim	Mukammil			Fake / directly
			Shah			inducted
· · ·	<u></u>	- CasliDazia	Fazli Rabi		<u>·</u>	Fake /
ιοι	4/1-11	FazliRaziq	Fazir Naur			directly
						inducted
102	5/1-11	Asad Rahim	Noor Rahim			Fake /
					<sup>1</sup> .	directly
				· · ·		inducted Fake /
103	6/1-11	Loban Ali	Muhib Ali			directly
						inducted
104		Noor Muhammad	Muqeem			Fake /
		ino or mutation indu				directly
	-		Khan			inducted
105		Muhammad	Maneem			Fake /
		Naeem	Khan			directly inducted
		<u> </u>	D (141 PH)			Fake /
÷ 106		ShabinaNaz	Raj Wali Khan	· · ·	· •	directly
					_	inducted
107		Ghazala	Ikramud Din			Fake /
						directly
ļ						inducted Fake / directly
1			tane i a			inducted as per
						report of PSC :
						while KP
108		Conservation and	Neutrinini Ali		$\sim$	Elementary & Secondary
		SeemaMujahid	Mujahid Ali		( χ	Education has
					ter and the second second second second second second second second second second second second second second s	owned her
	ļ					recommendati on and apptt
						vide letter no.
						3016/A17
			1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 - 1994 -			SST/(F)/G cases dt 19.2.2018 at
						s.no. 9
 				· · · · · · · · · · · · · · · · · · ·		Fake / directly
						inducted as per
						report of PSC
1					<pre># * **********************************</pre>	Elementary &
109		Shazia Jan	Jan Áfzal			Secondary
1						Education has . owned her
						recommendati
						on and apptt
				,		vide letter no. 3016/A17
						SST/(F)/G cases
						dt 19.2.2018 at
· · · · · · · · · · · · · · · · · · ·				·		s.no. 10
. 110		Abdul Wahid	Ghulam Jalil			Now retired as H/M and
						may be
				production and the second second second second second second second second second second second second second s		exonerated
111		Mohammad Tariq	Sher			Fake /
			Mohammad			directly
;	· · · ·		<u>  · · · · · · · · · · · · · · · · · · ·</u>	·		inducted
112		Bashir Ahmad	Khan			Fake / directly
			Mohammad			inducted
	I. KHAN	<u> </u>			· · · · · · · · · · · · · · · · · · ·	
		· · · · · · · · · · · · · · · · · · ·				
			any -	Recommended by PSC for	for a for the second	Maybe
113	134	Muhammad Wali	Shah Wali	apptt as SST (G) reported to this office videletterNo.		exonerated
	1, 134	Tivrunanındu VVall T		PCS/SR/II/ 04034 dated /	x1/	
				21.2.2018 at S. No. 123 (G)	V W	
 	i 28/U-II	Abdul Baseer	Ghulam Khan	<u></u>	<u>/</u> 1	Fake /
				L	1	

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		بنم محمد معرف			· · ·		
	لو المراجع مستقد الع	1	· · · · · · · · · · · · · · · · · · ·	<u> </u>		ş	
			•		·		directly inducted
	<u>, 58 65</u>	SHAWAR	· · · ·	·			<u> </u>
· · ·						Verified/ owned by E&SE KP	
						(contract/regularization)	A lexonerated a
, <i>.</i>	:115	136	Ayaz Khan	Muhammad		reported to this office vide	
	. 3			Dost		letter No.2811/File-1/SST (M)	
						FATA/NAB Inquiry/2018 dated	
						16.2.2018 at S. # 25	
	116	138	Khalid Mahmood	Syed Khanan	Recommended by PSC for		
:			•		apptt as SST (G) reported to	• <u>·</u>	Acexonerated Va
:					this office (through court		
		•			order)		
	117	139	MehnazAfridi	Zahir Shah	Recommended by PSC KPK		
					as per 2005 advertisement		exonerated
:			1	1	Recommended by PSC for		
• • •	118,	27/L-11 *			apptt as SST (G) reported to		exonerated S
			Faiz Muhammad	Amanat Khan	this office videletterNo.		
•					PCS/SR/II/ 04034 dated	N.	
	•••				21.2.2018 at S. No. 43 (G)		
• •	\$R TA	ANK					
					· •	Verified/ owned by E&SE KP	A Mayberry
						(contract/regularization)	vexonerated
	119	140	Abdur Rashid	Ayaz'Khan	•	reported to this office vide	
						letter No.2811/File-1/SST (M)	
						FATA/NAB Inquiry/2018 dated	
-		· ·				16.2.2018 at S. # 28	
<b>;</b> . •					Recommended by PSC for		May ne sa
					apptt as SST (Sc) reported to		Lexonerated
	120	141	Muhammad Iqbal	Muhammad	this office videletterNo.		
				Ali	PCS/SR/II/ 04034 dated	· •	
					21.2.2018 at S. No. 46 (Sc)		
	FR LA	UKKI					
	 	•.* •					Notes and the second second
	<b>,</b>				Recommended by PSC for		
					apptt as SST (G) reported to		tar Maybel
	121	. 142	Samiuliah Jan	Yousaf Khan	this office videletterNo.		exonerated
:	, 			1	PCS/SR/II/ 04034 dated		
• • •		· · ·	· · · ·		21.2.2018 at S. No. 157 (G)		
· ·					/	h	Fake / directly
• •	,				/	/	inducted
	-122	29/L-II	Mst. Iqbal Fatima	Gul Fatima		h/	however transfer order
* ·	• • •		e e e e e e e e e e e e e e e e e e e				from KP to
• •	1 ' . •						FATA is available
:		······	<u> </u>	<b>1</b>	· · · · · · · · · · · · · · · · · · ·	1 <u></u>	
•	•			1		e k	
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		• • ·				
FR KC	нат :					
 			,		Verified/ owned by E&SE KP	
			, t		(contract/regularization)	alozi terreti ni kuto SztriMavber ni
	144	Arshadullah Khan	Muhammad		reported to this office vide	exonerated
			Zaman		letter No.2811/File-1/SST (M)	
• •					FATA/NAB Inquiry/2018 dated	
•			•		16.2.2018 at S. # 29	
					Verified/ owned by E&SE KP	
		•			(contract/regularization)	Mavibe 19
124	145	Muhammad Israr	Ghaffár Khan		reported to this office vide	rexonenated
	•	Khan .	1		letter No.2811/File-1/SST (M)	
					FATA/NAB Inquiry/2018 dated	
ę -					16.2.2018 at S. # 30	
i :				Recommended by PSC for	·	
				apptt as SST (Sc) reported to		
125	146	Muhammad	Muhammad	this office videletterNo.		nexonerated a
		Numan	lqbal -	PCS/SR/II/ 04034 dated		
			1	21.2.2018 at S. No. 48 (Sc)		
· · · · · ·	· · · · · ·			Recommended by PSC for	· · · · · · · · · · · · · · · · · · ·	
				apptt as SST (G) reported to		
. 126	147	Muhammad Nisar	Shalam .	this office videletterNo.		exonerated
<b>i</b> .				PCS/SR/II/ 04034 dated		
	• •	*	•	21.2.2018 at S. No. 2 (G)	· · · ·	
				Disable		
ΒΛΙΑ	UR AGEN	Г СҮ	/		· · · · ·	Level of the second second
		<u>``</u>	· ·	Recommended by PSC for		
ý	• · ·			apptt as SST (G) reported to		Maxibe has
127	148 ·	SamiulHaq	Hazordan	this office videletterNo.		exonerated
				PCS/SR/II/ 04034 dated	-	
				21.2.2018 at S. No. 158 (G)		
	<u> </u>			Recommended by PSC for		
			ند	apptt as SST (Sc) reported to	4	Mavbezk
128	149	HaidarZaman	Shahzada	this office videletterNo.		exonerated b
				PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 1 (Sc)		
				· · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	Fake /
129	155	Nasrat	Hayat Khan			directly
130	156	Nargis	Bahadar Khan		·	inducted Fake /
· · · · ·						directly
	9/Ĺ-III	Basra Begum	FazliWahab	·	ħ <del>./</del>	inducted Fake /
	j ∋/⊾mi I		[ [02114401160	/ ,	h/	directly
	L	· · · · ·		<u> </u>		inducted
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·	<u> </u>		<u></u>		· · · · · · · · · · · · · · · · · · ·	

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132 -	• .	Yar Khan	Ali Rehman			Fake / directly
						inducted
кнув	ER AGE	NCY				• •
		· · · ·				Fake / directly
133	·	Nasir Khan	Muhammad			inducted
		1	Ghani			
				Recommended by PSC for	· .	
	]			apptt as SST (G) reported to		May Bell
134	·	Sabir Shah	Tamash Khan	this office videletterNo.		- Jexonerated v
				PCS/SR/II/ 04034 dated		
				21.2.2018 at S. No. 151 (G)		
135		Kifavatullah	Rahim Khan		· ·	Fake / directly
						inducted Fake / directly
						inducted and
136		Ahmad Shah	Feroz Shah			already Struck off from the
				<b>.</b> .	$(\mathbf{X})$	role of DoE
						FATA vide No.
		A A A A A A A A A A A A A A A A A A A	<del>.</del>	and the second sec	X	1947-52 dated 26.1.2017
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ORA	KZAI AG	ENCY	1		VU Vin	- *** #.
		<u> </u>	<u> </u>	Recommended by PSC for		
		N4ubammad	SherAslam	apptt-as SST (Sc) reported		
37		Muhammad	SilerAsian	to this office videletterNo.		mexonerated
•	• • •	MudassirAslam		PCS/SR/II/ 04034 dated	•	
• •				21.2.2018 at S. No. 47 (Sc)	• •	
			·   ·	Recommended by PSC for		
				apptt as SST (G) reported to	•	
138		Said Hakim	Amin Gulab	this office videletterNo.	<b></b>	2 variMavibe Solexonerated
• •	÷ .			PCS/SR/II/ 04034 dated		
					<b></b>	
	`			21.2.2018 at S. No. 152 (G)	· · · · · · · · · · · · · · · · · · ·	Fake / directly
139.		Raza	Wali Khan			inducted
		Muhammad			·	:
		· · ·		Recommended by PSC for		
		GulShehzad	Mir Azam Khan	apptt as SST (Sc) reported	i.	Star May be a
140,		Khan		to this office videletterNo.		- Hexonerated
				PCS/SR/II/ 04034 dated		
	÷.,			- 21.2.2018 at S. No. 28 (Sc)		
	<u> </u>		· · · · · · · · · · · · · · · · · · ·	Recommended by PSC for		
r -			NA. the sum are still	apptt as SST (Sc) reported		
141		Muhammad	Muhammad	to this office videletterNo.		2. May be the
		Ibrahim	Ghani	PCS/SR/II/ 04034 dated	· ·	
	·	· · ·				
	 		/	21.2.2018 at S. No. 45 (Sc)	/	- Faké / directi
142	1	SaimaWadud	Wadud Khan		]_//	- Fake / directiv
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										report of PSC
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112		Sabiha	MianGul Jan							owned her
140	1								re	commendation
										and apptt vide
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144		Inayatullah	Muhammad							inducted
			Yousaf							
a		and the second								Fake / directly
145		Sajjad Ahmad	Abdul·Nawab							inducted
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BA	AUR AG	IENCY				.		La le	/.	<u></u>
	·	ShabanaBibi .	Abdul Sattar						×.	Fake / directly
. 146	ļ	Shabanabibi.	ADUULSactor			•	-	/	ľ	inducted as per report of PSC
										while KP
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										Education has
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i ji v					•					s.no. 14
· [	· · · · · · · · · · · · · · · · · · ·									Fake / directly inducted as per
										report of PSC
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14	7	Salma Jabeen	Abdul Ghaffar			Ì				Elementary &
14	/   · · ·	Junia Juna an							ļ	Secondary
										Education has owned her
										recommendation
										and apptt vide
										. letter no.
										3016/A17
· 1 ·										SST/(F)/G cases
Ξ.			· .				Į		•	dt 19.2.2018 at s.no. 15
•										Fake / directly
14	8	SaimaWali								inducted
. [ ] ]		1				· ·				Fake / directly
14	9	Mst; Alia	ItbarGul	-		· ·-	- · · ·	1. <b>b</b>	`	inducted
4			1							
1		Mst; Basmina	Mir Alam khan							Fake / directly
1-							<u> </u>	··		inducted
	<u> </u>									

	· 	M	DHMAND AGE	NCY		
: : :	151		InayatRahman	AbdurRahman	······	Fake / directly inducted
	: 152		Nizakat /	Said Ali Shah		Fake / directly inducted

	ORAKZA	I AGEN	СҮ					,
53	Kalsoon	Shah	, Qimat Shah					Fake / directl inducted
54	Ikramia	Begum	Muhammad Sardar					Fake / directl inducted
			LIST OF D	UPL	ICATED SSTs			
155	44	Maula J	an	-	Shahi Khan		apptt as SS to this offi No. PCS/ dated 21.2 42 (Sc) a	ded by PSC for (Sc) reported ce vide letter SR/II/ 04034 2018 at S. No. and may be
156	69	Abdul H	lai		Muhammad Ta	yyib	Fake / dire as no reco with KPK as letter No. SST (M) Inquiry dt	ed at s.no 37 ectly inducted rd is available reported vide 2811 file No. 1 FATA/NAB 16.2.2018 at no. 59
- 157	82	Asma			Muhammad Akb	ar		directly at S. No. 68
158	67	Inayati	Rahman		AbdurRahman			/ directly at S. No. 151
No. of SS	s Ts verifie	ed by E	commended b &SE KP / inducted in s				= 59 = 26 = 69	A

#### RECOMMENDATIONS:

From the scrutiny and perusal of the record in the Directorate of Education FATA, Directorate of Elementary & Secondary Education KPK,lists provided by Public Service Commission KPK, investigation of the SSTs concerned and dealing hands along with discussions / meeting of the enquiry committee, it is recommended that:

No of fifty nine(59)SSTs whose recommendations for appointment verified by Khyber Pakhtunkhwa Public Service Commission may be exonerated from the charges of fake/directly inductees.

Further twenty six(26) No of SSTs whose contract appointment and regularization orders verified by Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa may also be exonerated from the charges of fake / directly inductees.

The No. of Sixty nine (69) SSTs who were neither recommended by Public Service Commission Nor promoted / recruited by Elementary & Secondary Education Khyber Pakhtunkhwa, their salaries may immediately be stoppedand proceeding under efficiency and disciplinary rules 2011 may be initiated.

Directorate of Elementary & Secondary Education KPK may be asked to place the services

Khyber Pakhtunkhwa at the disposal of AI&C Deptt: FATA Secretariat being the proper forum for posting in FATA, in the light of Estab: Deptt: Govt. of KPK (Regulation Wing) letter No. SOR-VI/E&AD/1-10/2009 dated 30<sup>th</sup> July 2009**(Annex-Q)**.

Previously the interims reports by the two members i.e. Shams-u-Zaman Section Officer (AI&C Deptt) FATA Secretariat and MohibAfridi Agency Finance Officer FATA Secretariat were made the part of the report submitted to NAB(Annex-R&S), but was not considered up to mark by NAB authorities. However the response of the two members in the light of the draft enquiry report submitted to them for their feedback vide this office letter No. 4080-82 dated 02.03.2018(Annex-T) is hereby included in the fresh enquiry vide (Annex-U).

A detailed inquiry is already under process in the instant case in NAB office Khyber Pakhtunkhwa,the responsibility against the officials / officers involved in this game of blunder will be fixed in the light of recommendations by NAB office after finalization of the said inquiry as all the relevant record has been handed over to NAB office and still is in their custody.

11

🔆 Mr. Attiq-ur-Rehman/

Muhammad N

Coop<del>ter M</del>ember Asstt: Director (Estab)

Hanif-ur-Rehman Addl: Director (Estab)

Chairman

Enquiry Committee Director Education FATA.