

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 453/2016

Date of Institution ... 25.04.2016

Date of Decision ... 09.10.2019

Khushnama, Primary School Teachers, Govt. Girls Primary School, Jahangira
District Swabi. ... (Appellant)

VERSUS

Secretary Education, Govt: of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
and four others. ... (Respondents)

PRESENT:

MR. HAZRAT SAID KHAN,
Advocate

--- For appellant.

MR. KABIRULLAH KHATTAK,
Additional Advocate General

--- For respondents.

MR. AHMAD HASSAN,
MR. MUHAMMAD HAMID MUGHAL

--- MEMBER(Executive)
--- MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Arguments of the learned counsel for the
parties heard and record perused.

ARGUMENTS:

02. Learned counsel for the appellant argued that initially on the
recommendations of the Departmental Selection Committee, she was appointed as
PST in District Kohistan vide order dated 02.12.2009. After assumption of charge
she started performing duty at GGPS Dubair on 03.12.2009. That through order
dated 08.01.2011, the appellant was transferred to her home District, Swabi and
posted at GGPS, Jahangira. Her transfer was covered under the Khyber
Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers,

Lecturers, Instructors and Doctors) Regulatory Act, 2011. While in service respondents withdrew her appointment order through notification dated 19.10.2015, despite the fact that she had rendered five years continuous service. To her utter surprise without affording opportunity of defense her services were terminated vide order dated 20.10.2015. She filed departmental appeal on 26.11.2015 which was remained un-responded. Thereafter, she filed writ petition in Peshawar High Court, Peshawar which was disposed of vide order dated 18.03.2016. Being a regular government servant before passing any adverse order respondent no.3 required to have initiated proceedings against her under E&D Rules-2011, but the procedure followed by them was patently illegal and unlawful thus she was condemned unheard. He further invited attention of this Tribunal to judgment of this Tribunal dated 22.03.2019 passed in service appeal no. 716/2016 and made a request that the present appeal being of similar nature be decided on the strength of the same.

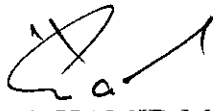
03. Learned Additional Advocate General argued appointment order of the appellant was fake and bogus. On the directions of Director, Elementary and Secondary Education, the task was probe to assigned to the then DEO, Kohistan (Mr. Riaysat). The enquiry report confirmed that these teachers were appointed in violation of the prescribed procedure therefore, their appointments were illegal. Based on the recommendation of the enquiry report respondent no.1 withdrew transfer order dated 08.01.2011 through order dated 19.10.2015 and her services were terminated through order dated 20.10.2015. Procedure mentioned in the rules was followed and the appellant was treated fairly and justly.

CONCLUSION:

04. This service appeal pertains to the determination of legality of the appointment order of the appellant dated 02.12.2009 issued by respondent no.2 coupled with withdrawal of transfer order dated 08.01.2011 to District Swabi, through order dated 19.10.2015. The stance of the appellant has been vehemently rebutted by the respondents on the ground that on the basis of enquiry conducted by the then DEO, (M) Kohistan her appointment came out to be illegal/unlawful. The contention of the respondents may be correct but the process for proceedings against a regular civil servant was not followed by them. Services of the appellant were terminated vide order dated 20.10.2015, on the basis of fact finding enquiry that has no value in the eyes of law. We have been repeatedly sensitizing the respondents that penalty to a civil servant can only be awarded on the basis of enquiry conducted according to E&D Rules 2011. As the established procedure was not followed by them so the only remedy available was to remit the case back to them to conduct de-novo enquiry strictly in accordance with law and rules and thereafter they would be at liberty to pass any order as deemed appropriate. This judgment is intandem with judgment dated 22.03.2019 passed in service appeal no. 716/16

05. This Tribunal has remitted numerous cases to the respondents due to the flaw referred to above. In order to save the time and resources of the provincial government and to avoid dragging civil servants in unnecessary litigation, it would be in the interest of department, if they arrange a crash course on E&D Rules 2011 for the employees of their lower formations so that such mistakes are not repeated in future.

06. As a sequel to the above, the present appeal is accepted, impugned order dated 20.10.2015 is set aside and the respondents are directed to conduct enquiry proceedings under E&D Rules 2011 within a period of ninety days from the date of receipt of this judgment. The issue of back benefits shall be subject to the final outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record room.



(MUHAMMAD HAMID MUGHAL)
MEMBER



(AHMAD HASSAN)
MEMBER

ANNOUNCED
09.10.2019

Order

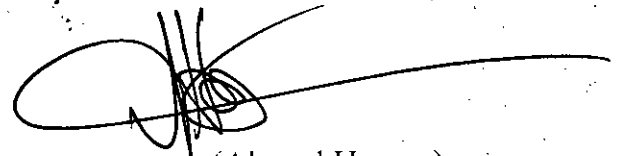
09.10.2019

Appellant with counsel present. Asst: AG for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today of this Tribunal placed on file, the present appeal is accepted, impugned order dated 20.10.2015 is set aside and the respondents are directed to conduct enquiry proceedings under E&D Rules 2011 within a period of ninety days from the date of receipt of this judgment. The issue of back benefits shall be subject to the final outcome of the de-novo enquiry. Parties are left to bear their own cost. File be consigned to the record room.

Announced:

09.10.2019



(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member

14.05.2019 Counsel for the appellant and Addl: AG for respondents present. Arguments could not be heard due to complete breakdown of electricity. Adjourned to 04.07.2019 for arguments before D.B.



(Ahmad Hassan)
Member



(M. Amin Khan Kundi)
Member

04.07.2019 Learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel learned Assistant Advocate General for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 27.08.2019 before D.B



(Hussain Shah)
Member



(M. Amin Khan Kundi)
Member

27.08.2019 Muhammad Mutwahir Shah husband of the appellant on behalf of appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General present. Husband of the appellant seeks adjournment on the ground that learned counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 09.10.2019 before D.B.



Member



Member

01.02.2019

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 13.02.2019 before D.B.


Member


Member

13.02.2019

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant requested for adjournment Adjourned. To come up for arguments on 22.03.2019 before D.B.


(Hussain Shah)
Member


(Muhammad Amin Khan Kund))
Member

22.03.2019

Counsel for the appellant and Addl: AG for the respondents present.

Due to paucity of time, instant matter is adjourned to 14.05.2019 before the D.B.


Member


Chairman

01.11.2018

Due to retirement of Hon'able Chairman, the Tribunal is defunct. Therefore, the case is adjourned for the same on 20.12.2018 before D.B.


Reader

20.12.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Since similar nature Service Appeal No. 372/2016 has been adjourned due to non-availability of learned counsel for the appellant hence, the present service appeal is also adjourned being similar nature appeal for the same date i.e 30.01.2019 for arguments before D.B.

~~30.01.2019~~

~~Counsel for the appellant present. Mr. Kabirullah Khattak, (Hussain Shah) (Muhammad Amin Khan Kundi) Addl: AG for respondents present. Arguments of learned counsel for the appellant heard. Learned Addl: AG seeks adjournment. Adjourned. Case to come up for arguments on 01.02.2019 before D.B.~~

~~Member~~

~~Member~~

30.01.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Arguments of learned counsel for the appellant heard. Learned Addl: AG seeks adjournment. Adjourned. Case to come up for arguments on 01.02.2019 before D.B.


Member


Member

05.07.2018

Counsel for the appellant and Mr. Sardar Shoukat Hayat, Additional AG for the respondents present. Similar nature appeals are fixed on 24.07.2018 therefore, the present appeal is also fixed for the same date i.e 24.07.2018 for arguments before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Kundi)
Member

24.07.2018


Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 17.09.2018 before D.B



Member


Member

17.09.2018


Clerk to counsel for the appellant and Mr. Kabirullah Khattak Learned Additional AG alongwith MR. Abdul Gahfoor Superintendent and Fazal Raheem ADEO (F) for the respondent present. Due to General Strike of the Bar, arguments could not be heard. To come up for arguments on 01.11.2018 before D.B.


(Hussain Shah)
Member


(Muhammad Amin Kundi)
Member

12.02.2018

Husband of the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney alongwith Fazal Raheem ADO for respondents present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 16.04.2018 before D.B



(Ahmad Hassan)
MEMBER


(Muhammad Hamid Mughal)
MEMBER

16.04.2018

Counsel for the appellant and Adll: AG alongwith Mr. Abdul Ghaffar, Supdt and Mr. Fazal Rahim, ADO for respondents present. Learned AAG seeks adjournment. Adjourned. To come up for arguments on 20.04.2018


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

20.04.2018

Counsel for the appellant and Adll:AG alongwith Mr. Fazal Rahim, ADO and Mr. Abdul Ghaffar, Supdt for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 05.07.2018 before D.B.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

12.06.2017


Clerk of the counsel for appellant and Mr. Hameed-Ur-Rahman, AD (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional AG of the respondents present. Clerk of the counsel for appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 12.10.2017 before D.B.



(Gul Zoh Khan)
Member


(Muhammad Amin Khan Kundi)
Member

12.10.2017

Clerk of the counsel for appellant present. Mr. Usman Ghani, District Attorney for the respondents present. Clerk of the counsel for appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 26.12.2017 before D.B.


Member
(Judicial)


Member
(Judicial)

26.12.2017

Clerk of counsel for the appellant and M. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. Granted. To come up for arguments on 12.02.2018 before the D.B.


Member


Chairman

26.10.2016

Husband of the appellant and Mr. Jamshed Khan, Supdt alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply/comments on 12.12.2016 before S.B.


Chairman

13.12.2016

Since 12th December, 2016 has been declared as public holiday on account of 12th Rabi-ul-Awal, therefore, case to come up for the same on 18.01.2017 before S.B.


Reader

18.01.2017

Appellant in person and Mr. Hameed ur Rehman, AD (Litigation) alongwith Addl. AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on 12.06.2017.


(ASHFAQUE TAJ)
MEMBER

30.6.2016

Counsel for the appellant present. Learned counsel for appellant argued that the appellant was appointed as PTC vide notification dated 02.12.2009 in the moved and manners prescribed by law but her appointment order was cancelled vide impugned order dated 22.10.2015 on the allegations of illegal appointment where-against she preferred departmental appeal on 26.11.2015 which was not responded and hence the instant service appeal on 25.04.2016.

That the appointment of the appellant was made in the moved and manners prescribed by law and that the appellant was neither subjected to any enquiry nor associated with the same.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 16.08.2016 before S.B.


Chairman

Appellant Deposited
Security & Process Fee

16.08.2016



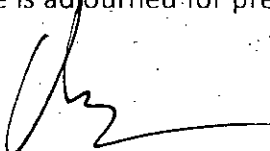

Clerk to counsel for the appellant and Mr. Jamshid, Supdt. alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 26.10.2016 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 453/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.04.2016	<p>The appeal of Mst. Khushnama resubmitted today by Mr. Hazrar Said Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	29-4-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>19-5-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	19.05.2016	<p>Appellant in person present. Due to strike of the Bar learned counsel for the appellant is not available today before the Court, therefore, case is adjourned for preliminary hearing to 15.6.2016 before S.B.</p> <p style="text-align: right;"> Member</p>
	15.06.2016	<p>None for appellant present. Notice be issued to counsel for the appellant for preliminary hearing on 30.06.2016 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mst. Khshnama PST GGPS Jehangira Swabi received to-day i.e. on 25.04.2016 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellat.
- 2- Copy of order dated 19.10.2015 mentioned in para-7 of the memo of appeal (Annexure-F) is not attached with the appeal which may be placed on it.
- 3- Page Nos. 18, 36 to 38 and 43 of the appeal are illegible which may be replaced by legible/better one.

No. 654 /S.T,

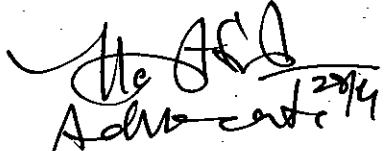
Dt. 25/4 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hazrat Said Khan Adv. Pesh.

28/04/2016

Re-Submitted with Compliance and
it is submitted that the order mentioned in
para No. 7 of the appeal in Annexure "F" is
available at page No. 43 of the appeal.


Advocate 28/4

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 453 /2016


Khushnama Primary School Teachers
Govt. Girls Primary School.....**Appellant**

V E R S U S

Secretary Education,
Govt. of Khyber Pakhtunkhwa & others.....**Respondents**

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-7
2.	Affidavit		8
3.	Addresses of parties		9
4.	Copy of the Appointment Order dated 02.12.2009	A	10-13
5.	Copy of the Charge Report	B	14-17
6.	Copy of the Adjustment Order	C	18-19
7.	Copy of the Transfer Order	D	20-33
8.	Copy of the Act 2011	E	34-38
9.	Copy of Enquiry Report	F	39-41
10.	Copy of Order dated 22.10.2015	G	42-44
11.	Copy of the Representation	H	45-46
12.	Copy of the writ petition & order	I	47-49
13.	Wakalatnama		50

Appellant
Through 
Hazrat Said Khan
Advocate,
Supreme Court of Pakistan
4-A, Haroon Mansion,
Khyber Bazar, Peshawar
Cell No.0300590701-4

Dated: 23/04/2016

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 453 /2016

Khushnama Primary School Teachers
Govt. Girls Primary School,
Jahangira District Swabi.....**Appellant**

K.W.P. Province
Service Tribunal
Diary No. 414
Dated 25/4/16

V E R S U S

1. Secretary Education, Govt. of Khyber Pakhtunkhwa
Civil Secretariat, Peshawar
2. Director Education, Khyber Pakhtunkhwa,
Peshawar
3. Deputy Director (Establishment) Elementary &
Secondary Education Khyber Pakhtunkhwa
Peshawarss
4. District Education Officer (F) District Swabi.
5. District Education Officer (F) District Kohistan

.....**Respondents**

**APPEAL U/S 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
ORDER OF DISMISSAL OF THE
APPELLANT DATED 22.10.2015 BY THE
RESPONDENT NO.5**

Q. Azeem
Registrar
25/4/16

re-submitted to day
and filed.

Q. Azeem
Registrar
28/4/16

Prayer

On acceptance of this appeal the order dated 22.10.2015 may please be set aside and the appellant be allowed to perform her duties at the school in which she was posted before her dismissal.

Respectfully Sheweth:-

1. That the Appellant is the resident of District Swabi and is a Primary School Teachers (PST) performing her duties at Govt. Girls Primary School (GGPS) Hayatabad, Jahangira, District Swabi.
2. That the Appellant was initially selected/ appointed as PST as her name was recommended by the Departmental Selection Committee (DBC) in District Kohistan. The appointment order of the Appellant alongwith other appointees was issued on 02.12.2009 by the executive District Officer (E&S) Education Kohistan. (Copy of the appointment order dated 02.12.2009 Endst No.539-44 is annexure "A").

3. That the Appellant assumed the charge of her duty on 03.12.2009 at GGPS Dubair Village before Noon in the office of Assistant District Education Officer Kohistan at Dussa. (Copy of the charge report is attached as annexure "B").
4. That the Appellant was performing duties as PST in GGPS Dubair but was transferred/adjusted on 19.10.2010 to GGMS Jijal, Kohistan. (Copy of the adjustment order is attached as annexure "C").
5. That the Appellant was transferred to her native village/locality for performing duties without hindrance, so, that the students could not suffer, therefore, was transferred on 08.01.2011 to District Swabi and was posted at GGPS Jahangira (Hayatabad) Swabi. (Copy of the transfer order is attached as annexure D).
6. That, in the meanwhile the provincial Assembly of Khyber Pakhtunkhwa also passed an act called the "Khyber Pakhtunkhwa" (appointment, deputation, posting and transfer of teachers, lecturer, instructors and Doctors) Regulatory Act, 2011 (Khyber Pakhtunkhwa Act, No.XII of 2011) for

regulating the services of the mentioned cadets in the whole of Khyber Pakhtunkhwa so that the purpose of the appointment of the staff be fruitful for the general public at large. (Copy of the Act is attached as annexure "E").

7. That the Appellant was performing duties in the said school with full zeal and devotion but in the meanwhile without any Information/notice to the Appellant a number of enquires have been held and lastly a transfer order of the Appellant was issued on 19.10.2015 in which the transfer order dated 08.01.2011 has been withdrawn almost after 5 long years. (Copy of the transfer/cancellation order dated 19.10.2015 is annexure "F").
8. That while the Appellant was going to submit departmental appeal for the cancellation of the withdrawal order but to the utter surprise of the Appellant the respondent No.5 issued a termination order on 22.10.2015 without giving any show cause notice or adopting proper procedure for passing/ imposing major penalty of termination while the Appellant has not reported her arrival in District Kohistan. (Copy of the order dated 22.10.2015 is annexure "G").

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 25018

Appellant.....Govt. Girls Primary School
Khushtama Primary School Teachers

V E R S U S

Respondents.....Govt. of Khyber Pakhtunkhwa & others
Secretary Education

ADDRESSES OF PARTIES

PETITIONER:-

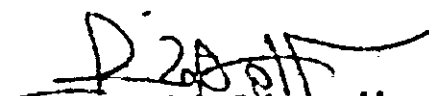
Jahangira District Swabi
Govt. Girls Primary School
Khushtama Primary School Teachers

RESPONDENTS:-

1. Secretary Education, Govt. of Khyber Pakhtunkhwa
Civil Secretariat, Peshawar
2. Director Education, Khyber Pakhtunkhwa
Peshawar
3. Deputy Director (Establishment) Elementary &
Secondary Education Khyber Pakhtunkhwa
Peshawar
4. District Education Officer (F) District Swabi
5. District Education Officer (F) District Kohistan

Appellant

Through


Haidat Saib Khan

Advocate

Supreme Court of Pakistan

Dated: 22/04/2018

intention, having no legal effect and is without lawful authority as the Appellant is neither posted in Kohistan District nor has assumed charge in District Kohistan, as such an illegal, unlawful order has been passed which has no waitage in the eyes of law, therefore, the order of this Honourable Court is necessary for its correction.

- C. That the competent authority has issued order of the Appellant while as per the Khyber Pakhtunkhwa Regulation Act XII 2011 the transfer has been made by the respondent No.2. After long lang years the termination of the Appellant is against the services rules based on flimsy ground while all the procedure has been followed for the appointment of the Appellant alongwith other candidate, as such the termination order is against the fundamental rights of the Appellant enshrined ⁱⁿ of the constitution of 1973.
- D. That the respondents have never extended an opportunity to the Appellant neither any kind of show cause notice has been served on her and all the enquiries have been held on her back which is arbitrary, illogical, against the termination laws and

2 (12)

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 12018

Khushnawa Primary School Teachers
Govt. Girls Primary School.....Appellant

V E R S U S

Secretary Education,
Govt. of Khyber Pakhtunkhwa & others.....Respondents

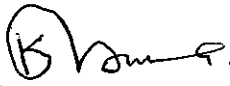
A F F I D A V I T

I, Muhammad Muttahir 2/o Sher Ali R/o Mohallah Awan
Jhangira P.O. Khas tehsil Lohar District Swabi (Special
attorney), do hereby solemnly affirm and declare on
oath that the contents of the accompanying Affidavit
petition are true and correct to the best of my
knowledge and belief and nothing has been
concealed from this Hon'ble Court.

DEPONENT
CNIC No. 18201-8423297-1

delectardorial therefore, is ultra virus, illegal, beyond jurisdiction and also against the settled principle and fundamental rights as guaranteed in constitution of Pakistan.

It is, therefore humbly prayed that On acceptance of this appeal the order dated 22.10.2015 may please be set aside and the appellant be allowed to perform her duties at the school in which she was posted before her dismissal.


KHUSHNUMA

Appellant

Through


Hazrat Said Khan

Advocate,

Supreme Court of Pakistan

Dated: 22/04/2016

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2016

Khushnama Primary School Teachers
Govt. Girls Primary School.....**Appellant**

V E R S U S

Secretary Education,
Govt. of Khyber Pakhtunkhwa & others.....**Respondents**

A F F I D A V I T

I, Muhammad Muttahir S/o Sher Ali R/o Mohallah Awan Jahangira P.O Khas tehsil Lahor District Swabi (Special attorney), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Writ petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT
CNIC No.16201-8422397-1

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2016

Khushnama Primary School Teachers
Govt. Girls Primary School.....**Appellant**

V E R S U S

Secretary Education,
Govt. of Khyber Pakhtunkhwa & others.....**Respondents**

ADDRESSES OF PARTIES

P E T I T I O N E R :-

Khushnama Primary School Teachers
Govt. Girls Primary School,
Jahangira District Swabi

R E S P O N D E N T S :-

1. Secretary Education, Govt. of Khyber Pakhtunkhwa
Civil Secretariat, Peshawar
2. Director Education, Khyber Pakhtunkhwa,
Peshawar
3. Deputy Director (Establishment) Elementary &
Secondary Education Khyber Pakhtunkhwa
Peshawar
4. District Education Officer (F) District Swabi
5. District Education Officer (F) District Kohistan

Appellant

Through


Hazrat Said Khan

Advocate,

Supreme Court of Pakistan

Dated: 22/04/2016

(19)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
KOHISTAN

APPOINTMENT

Consequent upon approval of the Departmental Committee Kohistan on the acceptance of appeal the competent authority is pleased to appoint the following (Female) candidates in BPS-6 plus usual allowances as due and admissible under the rules in the schools noted against each on vacant posts with immediate effect in the interest of public service according to the merit policy issued by the Government of NWFP, Elementary & Secondary Education Department subject to the following conditions.

Name of candidates with Father's Name	D/O	Name of School	Remarks
Rahisana Bibi D/O Mohammad Bashir	Mansehra	GGPS, Jhoom Gali	Agst V Post
Khushnara D/O Khurshid Ahmad	Peshawar	GGPS, Dubair Village	do-
Shazia L/O Zardad	Khojakor	GGPS, Bar Ser Palas	do-
Ajia Begum D/O Mohammad Ilyas	Peshawar	GGPS, Balangi	do-
Saima Sultan D/O Sultan Mohammad	Mansehra	do-	do-
Mona D/O Nazeer	Dubair	GGPS Bala Gaidan	do-

CONDITIONS

- Charge report should be submitted to all concerned.
- No TADA is allowed.
- Their appointments is purely on temporary basis and liable to termination at any time without assigning any reason/ notice.
- They will be governed by such rules & regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belong.
- In case of the above candidates failed to assume the charge of his post within 15 days their appointment automatically stand cancelled.
- They should not be allowed to take over charge if their age is less than 18 years and above 35 years.
- They should produce Age & Health Certificate from EDO Health Kohistan before taking over charge.
- Dy District Officer (F) is directed to verify his certificates/ Documents from the concerned Board/ Institution before drawl of their pay.

Executive District Officer
(E&S) Education Kohistan

Dated Kohistan the 9/12 2009

Encl: No

Cop of the above is forwarded to the

- PA to the Director Schools & Literacy, NWFP Peshawar.
- District Nazim Kohistan.
- District Coordination Officer Kohistan.
- District Accounts Officer Kohistan.
- Dy District Officer (F) Kohistan.
- Candidate concerned.

ATTES
17/02/2016

Executive District Officer
(E&S) Education Kohistan

OFFICE OF THE EXECUTION DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
KOHISTAN

APPOINTMENT

Consequent upon approval of the Departmental Committee Kohistan on the acceptance of appeal the competent authority is pleased to appoint the following (Female) candidates in BPS-6 plus usual allowances as due and admissible under the rules in the schools noted against each on vacate posts with immediate effect in the interest of public service according to the merit policy issued by the Government of NWFP, Elementary & Secondary Education Department subject to the following conditions.

S#	Name of candidates with fathers name	R/o	Name of School	Remarks
1.	Rukhsana bibi D/o Muhammad Bashir	Manshera	GGPS, Jhoom Gali	Agst V Post
2.	Khurshnama D/o Khurshid Ahmad	Peshawar	GGPS, Dubair Village	-do-
3.	Shazia D/o Zardad	Khotakar	GPS Bar Ser Palas	-do-
4.	Asia Begum D/o Mohammad Ilyas	Peshawar	GGPS Balangi	-do-
5.	Saima Sultan D/o Sultan Mohammad	Mansehra	-do-	-do-
6.	Norin D/o Nazeer	Dubair	GGPS Bala Gaidan	-do-

CONDITIONS

1. Change report should be submitted to all concerned.
2. No TA/DA is allowed.
3. Their appointments is purely on temporary basis and liable to termination at any time without assigning any reason/notice.
4. They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government servants to which they belong.
5. In case of the above candidates failed to assume the charge of this post within 15 days their appointment automatically stand cancelled.
6. They should not be allowed to take over charge if their age is less than 18 years and above 35 years.
7. They should produce Age and Health Certificate from EDO Health Kohistan before taking over charge.
8. Dy District Officer (F) is directed to verify his certificates/documents from the concerned Board/institution before drawl of their pay.

Sd/-
 Executive District Officer
 (E&S) Education Kohistan

Dated Kohistan 2/12/2009

Endst No.539-44

- Copy of the above is forwarded to the:
1. PA to the Director Schools & Literacy NWFP, Peshawar
 2. District Nazim Kohistan
 3. District Coordination Officer Kohistan
 4. Dy. District Officer (F) Kohistan
 5. Candidate concerned

*Muhammad
 #164
 21/4/16*

(54) (11)

(Annex-II)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION KHOSIWA
 Merit List of (Female) Non Local Candidates interviewed on 15-8-2018

S#	Name of candidate	Father's Name	District	D.O Birth	Qualification												Total
					GCE			FAFSc:			BA/BSc:			Profit Qualification			
					Pass	Fail	Merit	Pass	Total Marks	Merit Marks	Pass	Total Marks	Merit Marks	Pass	Total Marks	P.C.	
1	Rubina Sada	Mohammad Sadaq	Manshra	1/1/1984	50	50	20.47	50	1100	13.43	310	550	5.0	555	900	18.5	58.04
2	Anwar Begum	Asmat-ullah	Shanglah	15/4/81	50	50	21.28	50	1100	13.80	250	550	4.0	564	900	19.5	59.13
3	Nasreen Akhter	Gulzaman	Manshra	22/2/73	50	50	21.85	50	1100	14.60	264	550	4.0	542	1100	17.5	52.95
4	Reema	Nisar Khan	Manshra	10/5/1974	50	50	20.29	50	1100	13.93	272	550	4.0	532	1200	20.1	55.22
5	Rukhsana Bibi	Mohammad Bashir	Manshra	1/1/1984	50	50	20.47	50	1100	13.43	310	550	5.0	555	900	18.5	58.04
6	Arlal	Usman Ali	Shanglah	17/1/1985	50	50	20.01	50	1100	13.43	290	550	5.0	562	900	18.7	57.67
7	Gul Naz Begum	Ozai Ahmad	Manshra	8/10/1982	50	50	13.52	50	1100	22.50							
8	Shanishau	Said Ghulam	Shanglah	22/1/95	50	50	13.45	50	1100	13.36	300	550	4.0	523	1200	21.1	57.43
9	Aafia Begum	Mohammad Nayas	Peshawar	12/1/90	50	1050	15.91	60	1100	15.02							
10	Riffat Malak	Taj Malak	Peshawar	10/1/97	47	850	16.66	47	1100	10.85	247	550	4.5	613	900	20.6	52.65
11	Nadia Begum	Mustafa Gul	Sawabi	20/2/75	50	850	19.08	50	1100	13.14							
12	Nadira Mumtaz	Suhrah Khan	Shanglah	22/7/85	53	850	18.90	53	1100	12.16	252	550	4.0	651	1200	16.3	52.60
13	Shazia Riaz	Mohammad Riaz	Karak	30/4/86	52	850	18.39	50	1100	13.43							
14	Saima Imran	Inbran	Manshra	1/6/1981	49	850	17.61	50	1100	12.80							
15	Nasim Akhter	Haji Abid	Shanglah	2/1/1986	62	1050	17.66	52	900	14.69							
16	Sheeba Dilzara	Dillawar Khan	Manshra	17/4/86	50	850	18.22	50	1100	13.23							
17	Zainab	Merabaz Khan	Buner	10-1-85	54	850	19.30	52	1100	13.23							
18	Mahooda	Gul Rehman	Swat	20/1/81	54	850	19.13	52	1100	13.23							
19	Riffat Mumtaz	Noor Elahi	Haripur	19/10/75	54	850	19.24	52	1100	11.84							
20	Saima Hanif	Mohammad Hanif	Manshra	4/2/1985	47	850	16.91	50	1100	12.45							
21	Nasreen Begum	Taj-ud Din	Buner	12-3-1975	53	850	13.59	50	1100	12.00	53	1000	5.0	571	900	17.2	48.50
22	Shamini Eqtan	Mahmud Said Wani	Swat	1/3/1982	49	850	14.41	49	1100	10.66							
23	Nushat Begum	Sher Akbar	Swabi	5/10/1974	46	850	16.35	57	1100	13.11							
24	Farhat Begum	Abdul Mateen	Swat	1/1/1983	41	850	14.62	53	1100	11.09	27	550	4.0	493	900	16.4	45.62
25	Sonia Bibi	Abdul Hamid	Manshra	24/10/78	56	850	19.84	41	1100	10.43							
26	Tahira Bibi	Muhammad Yunus	Manshra	5/1/1987	47	850	16.00	50	1100	11.50							
27	Tanzil	Hasan Farosh	Buner	12/4/1983	42	850	15.00	55	1100	14.66							
28	Khush Nazra	Khurshid Ahmad	Peshawar	15/5/1976	42	850	15.74	50	1100	14.69							
29	Aiysha	Malik Lt. Akhter	Manshra	6/11/1975	57	850	18.25	47	1100	10.66							
30	Alia Rehana	Mansoor Ahmad	Haripur	6/11/1975	51	850	18.25	47	1100	10.66							
31	Tasreen Eib	Momin Khan	Buner	1/4-1985	39	850	14.01	49	1100	10.66							
32	Tazeem Bibi	Taj Muhammad	Manshra	1/4-1985	39	850	14.01	49	1100	10.66							
33	Sajida Zeb	Jehan Zeb	Manshra	1/4-1985	39	850	14.01	49	1100	10.66							
34	Bibi Hasina	Abdul Razzaq	Manshra	1/1/1983	37	850	13.24	45	900	12.66							
35	Ilaha Morin	Sumandar Khan	Manshra	19/3/79	52	850	18.60										
36	Mehnaz Bibi	Shah Farooq	Shanglah	4/1/1982	40	850	14.33	35	1100	11.18							
37	Alia Ghafoor	Ghafoor Gul	Sawabi	4/1/1980	67	1050	18.29										
38	Nozhin	Mian Gulzar	Abbottabad	2-4-1984	52	850	17.17	41	1100	11.05							
39	Kafia Bibi	Ozai Abdur Rashid	Abbottabad	14/1/80	48	850	16.74										
40	Saira Bibi	Muhammad Iqbal	Manshra	12/1979	54	1050	16.97										
41	Saira Gul	Mohd Baksh	Trak	15-4-85	40	850	15.18										
42	Zohia	Muhammad Yusuf	Swat	15-4-85	40	850	15.18										
43	Zohia	Muhammad Yusuf	Swat	8/6/1953	50	1050	14.29										

108-1-88
 ATTESTED
 15/8/2018

(56)

(13)

Annex - II

ATTESTED
H.S. J. 1/1/1986

S.#	Name of candidate	Father's Name	District	D/O Birth	Qualification									Total			
					SSC			FA			BA				PTC		
					Marks obtd	Total Marks	Merit Marks	Marks obtd	Total Marks	Merit Marks	Marks obtd	Total Marks	Merit Marks		Marks obtd	Total Marks	Merit Marks
89	Nazmeen	KHUSHAL Khan	Mansehra	23/1/86	400	850	14.118										14.118
90	Benash Yusuf	Mohammad Yusuf	Mansehra	18/3/85	399	850	14.082										14.082
91	Bibi Nazia	Fazal Wadood	Swat	1/1/1978	398	850	14.047										14.047
92	Yasmin Bibi	Dost Mohammad Khan	Mansehra	1/11/1971	380	850	13.412										13.412
93	Asma Maqbool	Maqbool Shah	Haripur	15/12/76	374	850	13.2										13.2
94	Phul Bibi	Gul Khanan	Mansehra	1/1/1976	367	850	12.953										12.953
95	Ilfat Jabeen	Mohammad Hussain	Mansehra	1/2/1985	363	850	12.812										12.812
96	Kosar	Javid Khan	Mansehra	1/1/1977	361	850	12.741										12.741
97	Bibi Anza	Wali Mohammad	Mansehra	1/1/1984	344	850	12.141										12.141
98	Mah Rukh	Mukhtar Ahmad	Mansehra	20/5/81	344	850	12.141										12.141
99	Nasim Akhtar	Noor Mohammad	G.H Khan	15/10/77	337	850	11.857										11.857
100	Javeria	Raja Zeheer Khan	Mansehra	15/4/82	335	850	11.824										11.824

Dealing Assistant
E&SE Kohistan

Dy. District Officer
(F) E&SE Kohistan

District Officer
E&SE Kohistan

Representative
DCO Kohistan

Executive District Officer
E&SE Kohistan

رپورٹ

سماة خوشنما نے آج فرم پر $3 \frac{13}{09}$ عہدہ EDO ERSE کے طور پر

پہلے 538-44 سے شروع کیا ہے $2 \frac{02}{09}$

کے تحت جس سے دو پیپر کاوشوں

میں بہت ہی اچھی کامیابی حاصل کی

اس کی ڈیوٹی کا آغاز آج سے

ADO E&S Edu
Chistarrat Dassu

سماة خوشنما کی طرف سے
گورنمنٹ گورنر پبلک سکول
دو پیپر کاوشوں

17/02/16

MEDICAL

15

Name of official

KHUSA NUMA

Rank

Teacher's Name

KHUR SHEH D. AHMAD

Residence

Fahrajul Tehsil District Dera

Date of birth

15-05-1976

Age by measurement

5

Signature of the official

[Signature]

Signature of head of office

Seal of Office

[Signature]

I do hereby certify that I have examined Ms

Khush Numa

for employment in the Office of the

EDO S+E Education

and cannot discover that he had any disease communicable or other constitutional affection of body

affinity expect

Nil

I do not consider this as disqualification for employment in the office of the EDO S+E

his age according to his own statement

34

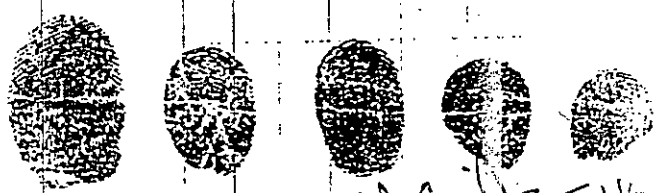
year and by appearance about

year (34) (thirty four years)

EXECUTIVE DISTRICT OFFICER (HEALTH)
DISTRICT KOHISTAN

Executive District Officer (Health)
Kohistan at Dera

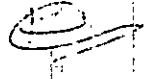
LEFT HAND THUMB AND FINGER IMPRESSION



ATTESTED

AS P 17/2/16

Attested
ADO S+E Edu
Kohistan at Dera

1	2	3	4	5	6	7	8
Name of post	Whether substan- tive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional F. for off. abn.	Other enrolment falling under the term "Pay"	Date of Appointment	Signature of Government Servant
P.S.T		BRL-07	Rs: 3530	-	-	190-5230	
G.S.S			Rs:	3530/-	✓	12/3/09	
Dudhary village		BPS 16	(3430-				
-11-	Temp.		Rs = 3430	/2		3 12/09	
G.C.M.S			Rs = 3430	/2		20 10/2010	
JITAL	-11-		3605/-	-			
-11-	-11-		3430/-	-		12/10	

AGC
17/12/16

Serial No.	Name of the Officer	Grade	Post	Period	Government to which attached	Remarks
12	Deputy Dist. Officer F & S Kohistan	AS-1	Deputy Dist. Officer F & S Kohistan	12/10/2010	Government to which attached	APPOINTED as P.S.T Teacher in BPS No. 7 (P: 3530-190-9250) AT ESSE Dukair Village near EDD ESSE Kohistan under Endst. No. 539-41 Dated 2-12-2009
10	Deputy Dist. Officer F & S Kohistan	AS-1	Deputy Dist. Officer F & S Kohistan	19/10/2010	Government to which attached	APPOINTED as P.S.T Teacher in BPS No. 7 (P: 3530-190-9250) AT ESSE Dukair Village near EDD ESSE Kohistan under Endst. No. 539-41 Dated 2-12-2009
11	Deputy Dist. Officer F & S Kohistan	AS-1	Deputy Dist. Officer F & S Kohistan	30/11/10	Government to which attached	APPOINTED as P.S.T Teacher in BPS No. 7 (P: 3530-190-9250) AT ESSE Dukair Village near EDD ESSE Kohistan under Endst. No. 539-41 Dated 2-12-2009
8	Deputy Dist. Officer F & S Kohistan	AS-1	Deputy Dist. Officer F & S Kohistan	11/11/10	Government to which attached	APPOINTED as P.S.T Teacher in BPS No. 7 (P: 3530-190-9250) AT ESSE Dukair Village near EDD ESSE Kohistan under Endst. No. 539-41 Dated 2-12-2009

IAS 17/2/10
ATTESTE

3/11/2010 3/11/10
Change order issued issued
WALL E.DD (ESSE)
Endst. No. 631-25
Dated 3-12-09 Please
Send BPS-6 instead BPS
67-

Deputy Dist. Officer
F & S Kohistan

Temp: / Permit
Drawn Rs: /
error of: /
District Account Officer
KOHISTAN

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION KOHISTAN.

ADJUSTMENT ORDER

The following newly appointed female Primary Teachers are hereby adjusted on their own pay and Scale in the School not against each in the interest of public service.

Table with columns: S.N, Name, School Name, Post, B.S, Home District, Adjusted School, Adjusted w.e.f. It lists 40 entries of female primary teachers and their adjustments.

Handwritten signature and the word 'ATTESTED' in bold capital letters.

Better copy

18/A

Office of the executive district officer alimentary and secondary education Kohistan.
Adjustment order

The following newly appointed female primary teacher are hereby adjusted there own pay and scale in the school noted against each in the interest of public services.

S.No	Name	School Name	Post	B.P. S	Home district	Adjusted school	Adjusted W.E.F
1	Yasmin Fareed	GGPS Pathan colony	Ptc	7	Kohistan	GGps Dm Khail	4/7/2009
2	Saima	GGPS Banjar B Plas	Ptc	5	Kohistan	GGps KuzyanJoon	4/7/2009
3	Shbnam Pari	GGPS Kundal	Ptc	5	Kohistan	Do	4/7/2009
4	Mhwish Hanief	GGPS Jale Churto	Ptc	5	Kohistan	GGps Shatail	10/7/2009
5	Shazia Bibi	GGPS Dubair Villege	Ptc	5	Kohistan	GGps Kandro Bair	20/7/2009
6	Effiat Jabeen	GGPS Ceglo	Ptc	7	Manshera	GGps Koze Hajdeer	7/8/2009
7	Naveda Akhtar	GGPS Summar Nala	Ptc	5	Kohistan	GGps Sazeen	11/8/2009
8	Asha Itaf	GGPS Kas banda	Ptc	7	Abbotabad	GGps Bar Yanjoul	1/4/2010
9	Saima Shreen	GGPS Banseri	Ptc	7	Manshera	GGps Jandar Kot	1/4/2010
10	Masooma Begum	GGPS pashot	Ptc	5	Kohistan	GGps SaMad Abad	1/4/2010
11	Gul Khzana	GGPS Baja Jalpkot	Ptc	5	Kohistan	GGps Momin Abad	1/7/2010
12	Saima Imran	GGPS Batangee	Ptc	7	Manashra	GGps Tyab Abad	1/7/2010
13	Saima Noreen	GGPS Charge Abad	Ptc	7	Manashra	GGps DO	1/7/2010
14	Sahbana Rabani	GGPS Kareen Khandia	Ptc	7	Manashra	GGps Chawa Sk	1/7/2010
15	Nadia Rehman	GGPS Batangee	Ptc	7	Manashra	GGps Galgan	1/8/2010
16	Fahmida Zeb	GGPS ghushali	Ptc	5	Kohistan	GGps Badar Shah D	1/8/2010
17	Gul Bibi	GGPS Badar shah	Ptc	5	Kohistan	GGps Seiral Shah Abad	1/8/2010
18	Mhnaza bibi	GGPS Pashoot	Ptc	5	Kohistan	GGps sheshrat	1/8/2010
19	Rehana Bibi	GGPS Mirana Abad	Ptc	5	Kohistan	GGps Do	1/8/2010
20	Sadaf zeb	GGPS Endar shah	Ptc	5	Kohistan	GGps Orina	1/8/2010
21	Shazia Kiran	GGPS Ghoshali	Ptc	5	Kohistan	GGps Momin abad	1/8/2010
22	Fozia Akhtar	GGPS Khat Karin	Ptc	7	Bunir	KK Ranolia	1/9/2010

Alli Zeb
29/4

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23	Riasat Bibi	GGPS Kai Rustam Abad	Ptc	7	Bunir	GGps DO	1/9/2010
24	Shnaz Zarbahti	GGPS K-K Kutai	Ptc	5	Bunir	GGps Koze Komela	1/9/2010
25	Tanzeel Hussain	GGPS KuzSherial	Ptc	7	Bunir	GGps sanagay	1/9/2010
26	Aisha qureshi	GGPS Banjar B-Plas	Ptc	5	Kohistan	GGps Banela Abad Gee	1/9/2010
27	Farhana Jabeen	GGPS Batangee	Ptc	5	Kohistan	GGps Razal Dhar	1/9/2010
28	Asia Fayyaz	GGPS Barseer Palas	Ptc	7	Peshawar	GGps Sanagay	1/10/2010
29	Bushra Khatoon	GGPS Kuze Khumela	Ptc	7	Manshera	GGps Phtan Village	1/10/2010
30	Hairi Jan	GGPS Dubair Villege	V	7	Kohistan	GGps Seo village	1/10/2010
31	Jawad Bibi	GGPS Dubair Village	Ptc	7	Manshera	GGps Phtan Village	1/10/2010
32	Khusar Shaheen	GGPS Khuz Kamela	Ptc	7	Manshera	GGps Do	1/10/2010
33	Khushnuma	GGPS Dubair Village	Ptc	7	Swabi	GGps Jijal	1/10/2010
34	Nazama Bibi	GGPS Batangi	Ptc	7	Manshera	GGps Keru	1/10/2010
35	Rifat Malook	GGPS Sazeen	Ptc	7	Karak	GGps Ranolia Bazar	1/10/2010
36	Sadia Manzor	GGPS Khat Karin	Ptc	7	Bunir	GGps Morin Bekit	1/10/2010
37	Tahira Naz	GGPS Kai Rustam Abad	Ptc	7	Charssad a	GGps Do	1/10/2010
38	Yasmeen Bibi	GGPS Charge Abad	Ptc	7	Manshera	GGps Jandar Kot	1/10/2010
39	Bibi Amina	GGPS Samar Nala	Ptc	5	Kohistan	GGps gakuz	1/10/2010
40	Farzana Fatima Zohra	GGPS Gheem Gali	Ptc	5	Manshera	GGps balyanjol	1/10/2010
41	Jamila Bibi	GGPS Ghemm gali	Ptc	5	Kohistan	GGps Sholgara	1/10/2010
42	Parwez Begum	GGPS Lohai Dadir	Ptc	5	Kohistan	GGps Gakuz	1/10/2010
43	Sabeel bibi	GGPS Chuchang	Ptc	5	Kohistan	GGps Dop gal jijal	1/10/2010

Attested
18/13
29/14

(18)

45	Sajma Bibi	GGPS Jhoom Gali	PTC	5	Kohistan	GGPS Dalil Abad	1/10/2010
46	Shagufta Seed	GGPS Shareed	PTC	5	Kohistan	GGPS Jessu Village	1/10/2010
47	Sharafat Jan	GGPS Kuz Purwa	PTC	5	Kohistan	-Jo-	1/10/2010
48	Tahira Bibi	GGPS Chuchang	PTC	5	Kohistan	GGPS Dar Komila	1/10/2010
49	Tehreema Mustafa	GGPS Jhoom Gali	PTC	5	Kohistan	GGPS Biskin Abad	1/10/2010
50	Yasmin Bibi	GGPS Shekari	PTC	5	Kohistan	GCMS Bhiknan Abad	1/10/2010

Executive District Officer
E&SE District Kohistan

Encls: No. 1004-6 / Dated Kohistan 13-12-2010

Copy of the above is forwarded to the:-

1. District Accounts Officer Kohistan.
2. District Officer (E&SE) Female Kohistan.
3. Deputy District Officer (E&SE) Female Kohistan.

Executive District Officer
E&SE District Kohistan

AS A → 17/12/16
ATTESTE

19/A

45	Saima Bibi	GGPS Jhoom Gali	PTC	5	Kohistan	GGPS Dalil Abad	1/10/2010
46	Shagufta Seed	GGPS Shareed	PTC	5	Kohistan	GGPS Dassu Village	1/10/2010
47	Sharafat Jan	GGPS Kuz Purwa	PTC	5	Kohistan	-do-	1/10/2010
48	Tahira Bibi	GGPS Chuchang	PTC	5	Kohistan	GGPS Dar Komila	1/10/2010
49	Tehreema Mustafa	GGPS Jhoom Gali	PTC	5	Kohistan	GGPS Miskin Abad	1/10/2010
50	Yasmin Bibi	GGPS Shekari	PTC	5	Kohistan	GCMS ShilKhan Abad	1/10/2010

**Executive District Officer
E&SE District Kohistan**

Endst: No. 8004-6/Dated Kohistan the 19/10/2010.

Copy of the above is forwarded to the :-

1. District Accounts Officer Kohistan.
2. District Officer (E&SE) Female Kohistan.
3. Deputy District Officer (E&SE) Female Kohista.

**Executive District Officer
E&SE District Kohistan**

*Atiqul
FARQ
29/10*

11 (15)

ANNEXURE "D"

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

OFFICE ORDER.

Consequent upon the approval of the competent authority, in relaxation of ban ~~Ms. Mumtaz~~ PST GGCMS, Jijal Kohistan, is hereby transferred against the vacant Post of PTC at GOPS Jehangira (Hayat Abad) Swabi, in her own pay and BPS in the interest of public service with immediate effect.

Notes:-

1. Charge report should be submitted to all concerned.
2. No TA/DA etc is allowed.
3. Executive District Officer (E&SE) concerned is directed to check her original service documents before making payment of salaries.
4. Her Seniority will be determined under the rules.

DIRECTRESS
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

File No. 985-90 / F.No.109/PTC/M.Edu:Case/P/Transfer Dated 9/1/2011

Copy forwarded for information & necessary action to the:-

1. Executive District Officer (E & S E) Kohistan
2. Executive District Officer (E & S E) Swabi
3. District Accounts Officer Kohistan.
4. District Accounts Officer Swabi
5. Teacher concerned.
6. PA to Directress, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Handwritten signature
ATTESTED

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Deputy Directress (Establishment)
Elementary & Secondary Education.
Khyber Pakhtunkhwa, Peshawar.

M.Zahir.

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20/11

Handwritten notes:
The case
9/1/11
10/1/2011

(21)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY EDUCATION KOHISTAN.

CHARGE RELINQUISH REPORT.

In compliance with the Director ELEMENTARY AND SECONDARY EDUCATION Department K.P.Y. Peshawar order No. 985-90
M.S.T, Khusnuma
8-1-2011 Distt Kohistan is
G.C.M.S. Tijal she is directed to report to E.D.O.
for duty on 10-01-2011 District Swabi
Elementary and Secondary Education

[Signature]
Executive District Officer
(S&SE) District Kohistan.

GS&PD, NW, FP. 293 FS. 2,000 P. of 100-18-10-2000-(3)

CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that we have on the fore/afternoon of this day respectively made over and receive charge of this office of the Divisional Officer (E) E.S.E. Lahore, Swabi
vide office order of the Director E.S.E. Endst No. 985-90 dt. 8-1-
2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:—

	Signature of relieved Government servant. <u>Khusnuma</u>
Station <u>Lahore Swabi</u>	Designation. <u>P.S.T. e.e. P.S. Hajala</u>
	<u>Tenaraji</u>
	Signature of relieving Government servant. <u>Vacant</u>
Dated. <u>11-01-2011</u>	Designation.

HAS
ATTACHED F12/116

(20)

LAST PAY CERTIFICATE

Pay Certificate of Mrs. Husni Summa P.S.T
of the G.P.S. Jigal Distt. M. KISTAN
proceeding to W. The Johang (Hajal Abad) Distt. Swabi

He has been paid upto 31-12-2010

at the following rates: B.P.S. = 06

Substantive Pay - <u>P.No. = 00552785</u>	B. Pay - <u>3605-00</u>
Officiating Pay -	H.R. - <u>1029-00</u>
Exchange Compensation Allowance:-	MA - <u>1000-00</u>
C.P.R. - <u>436</u>	SP. All. - <u>800-00</u>
B.P. - <u>180</u>	Ad. of 20% - <u>721-00</u>
A.G.I. - <u>07</u>	U.A.A. - <u>1442-00</u>
E.I. - <u>67</u>	Ad. - 50% - <u>1802-00</u>
EEF - <u>15</u>	<u>Total - 10399-00</u>
<u>Total - 705</u>	<u>Ded. - 705</u>
	<u>Net: 9694-00</u>

to be made over charge of the Office of 31-12-2010

to be made from the pay of the Government servant as detailed on the reverse.
The leave paid leave salary as detailed below. Deductions have been made as noted on the reverse.

LPN No. 6124/11/011
Counter signed [Signature]
District Account Officer to Kohistan

DEPUTY DISTRICT OFFICER
P. & S. SECTION
[Signature]

The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

No. Dated

Forwarded along with S/B 2010 to
The E.D.O (ESSE) Swabi for further
necessary action please.

Deputy Dist. Officer
P. & S. Kohistan
[Signature]

[Signature]
Officer (P)

ATTN: [Signature]
7/2/11

School Code 38368

(23)

21-01-2015 2015-16 12/12/15 بابت ماہ

کی ماہنامہ

Bank Account No. 6799-3

ABL Jehangir

Meter NO. 117925

آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط
-----	-------	-------	-------	-----	-------	-------	-------	-----	-------	-------	-------	-----	-------	-------	-------

20/15
PST 6-9
PST 7

P 11:20 P 7:30
 P 12:35 P 7:30
 Sunday
 P 12:35 P 7:30
 P 12:35 P 7:30
 P 12:35 P 7:30
 00

مطابق

P 12:35 P 7:30
 P 12:35 P 7:30
 P 12:35 P 7:30

میزان	میل	سائٹ	میزان	میل	سائٹ	میزان	میل	سائٹ	میزان	میل	سائٹ
-------	-----	------	-------	-----	------	-------	-----	------	-------	-----	------

37210412 37312368-3735
 H.S. J.
 11/12/15

25

رجوعی نامی ندر میں گزشتہ روز کے لئے

نمبر	تاریخ	وقت	مقام	نوع	ملاحظات
1	1300	1300	M	1	
2	1300	1300	M	1	
3	1300	1300	M	1	
4	1300	1300	M	1	
5	1300	1300	M	1	
6	1300	1300	M	1	
7	1300	1300	M	1	
8	1300	1300	M	1	
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13	1300	1300	M	1	
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15	1300	1300	M	1	
16	1300	1300	M	1	
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18	1300	1300	M	1	
19	1300	1300	M	1	
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26	1300	1300	M	1	
27	1300	1300	M	1	
28	1300	1300	M	1	
29	1300	1300	M	1	
30	1300	1300	M	1	
31	1300	1300	M	1	
32	1300	1300	M	1	
33	1300	1300	M	1	
34	1300	1300	M	1	
35	1300	1300	M	1	
36	1300	1300	M	1	
37	1300	1300	M	1	
38	1300	1300	M	1	
39	1300	1300	M	1	
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41	1300	1300	M	1	
42	1300	1300	M	1	
43	1300	1300	M	1	
44	1300	1300	M	1	
45	1300	1300	M	1	
46	1300	1300	M	1	
47	1300	1300	M	1	
48	1300	1300	M	1	
49	1300	1300	M	1	
50	1300	1300	M	1	
51	1300	1300	M	1	
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98	1300	1300	M	1	
99	1300	1300	M	1	
100	1300	1300	M	1	

رجوعی نامی ندر میں گزشتہ روز کے لئے

نمبر	تاریخ	وقت	مقام	نوع	ملاحظات
1	1000	1000	M	1	
2	1000	1000	M	1	
3	1000	1000	M	1	
4	1000	1000	M	1	
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19	1000	1000	M	1	
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26	1000	1000	M	1	
27	1000	1000	M	1	
28	1000	1000	M	1	
29	1000	1000	M	1	
30	1000	1000	M	1	
31	1000	1000	M	1	
32	1000	1000	M	1	
33	1000	1000	M	1	
34	1000	1000	M	1	
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36	1000	1000	M	1	
37	1000	1000	M	1	
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99	1000	1000	M	1	
100	1000	1000	M	1	

Handwritten signature and date: 17/2/16

27

رجسٹر حاضرین ہذا کے لئے

نام، پتہ، تعلیم، اور دیگر تفصیلات

Table with columns for Name, Address, Education, and other details. Includes handwritten entries and a large handwritten signature 'SUN'.

رجسٹر حاضرین ہذا کے لئے

نام، پتہ، تعلیم، اور دیگر تفصیلات

Table with columns for Name, Address, Education, and other details. Includes handwritten entries and a large handwritten signature 'SUN'.

Handwritten text and markings at the bottom left of the page.

Handwritten signature and text at the bottom center of the page.

رجسٹر حاضرین مدرسہ اسلامیہ سکول - ماریات آباد دہلی

بابت ماہ: جولائی 1951

ردیف	نام	پدر	مادر	پہنچ	وقت	نقص	تعداد
1							
2							
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Handwritten notes: Sun day, P, M, A, etc.

رجسٹر حاضرین مدرسہ اسلامیہ سکول - ماریات آباد دہلی

بابت ماہ: جولائی 1951

ردیف	نام	پدر	مادر	پہنچ	وقت	نقص	تعداد
1							
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30							

Handwritten notes: Sun day, P, M, A, etc.

Handwritten signature and stamp: ATTACHED 17/7/51

Handwritten notes and stamps at the bottom of the right page.

حاضر حاضرین

بابت ماہ		Anisa Maqsood	
1	8:25	11:30	8:30
2	8:25	11:30	8:30
3	8:25	11:30	8:30
4	8:25	11:30	8:30
5	8:25	11:30	8:30
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8	8:25	11:30	8:30
9	8:25	11:30	8:30
10	8:25	11:30	8:30
11	8:25	11:30	8:30
12	8:25	11:30	8:30
13	8:25	11:30	8:30
14	8:25	11:30	8:30
15	8:25	11:30	8:30
16	8:25	11:30	8:30
17	8:25	11:30	8:30
18	8:25	11:30	8:30
19	8:25	11:30	8:30
20	8:25	11:30	8:30
21	8:25	11:30	8:30
22	8:25	11:30	8:30
23	8:25	11:30	8:30
24	8:25	11:30	8:30
25	8:25	11:30	8:30
26	8:25	11:30	8:30
27	8:25	11:30	8:30
28	8:25	11:30	8:30
29	8:25	11:30	8:30
30	8:25	11:30	8:30
31	8:25	11:30	8:30

محل	محل	محل	محل	محل	محل	محل
-	-	-	-	-	-	-
-	-	-	-	-	-	-
-	-	-	-	-	-	-
-	-	-	-	-	-	-

17/2/16

TEACHER'S ATTENDANCE REGISTER

For the month of September 2017

No. 2 No. 3 No.

(30)

Dates	B.A. (C-1)				(F.A) P.T.C				B.Sc (C-1)				Ch. Vidar			
	Att.	Sig.	Dep.	Sig.	Att.	Sig.	Dep.	Sig.	Att.	Sig.	Dep.	Sig.	Att.	lg	Dep.	Sig.
1																
2																
3																
4																
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31																

STATEMENT OF LEAVES TAKEN.

This month	Total	Casual		Pri		Total		To go		Pri		Total		Casual		Pri	
		Excess	Def	Excess	Def	Excess	Def	Excess	Def	Excess	Def	Excess	Def	Excess	Def		
Present																	

REGISTER



Dates	Arr.	Sig.	Dep.	Sig.	Att.	Sig.	Dep.	Sig.	Att.	Sig.	Dep.	Sig.	Majna Pagan				Jind Division			
													Att.	Sig.	Dep.	Sig.	Att.	Sig.	Dep.	Sig.
1																				
2																				
3																				
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STATEMENT OF LEAVES TAKEN

This month	Total	Casual		Pri		Total		To go		Pri		Total		Casual		Pri	
		Excess	Def	Excess	Def	Excess	Def	Excess	Def	Excess	Def	Excess	Def	Excess	Def		
Present																	

ATTENDED BY
 H.S. J. 17/9/16

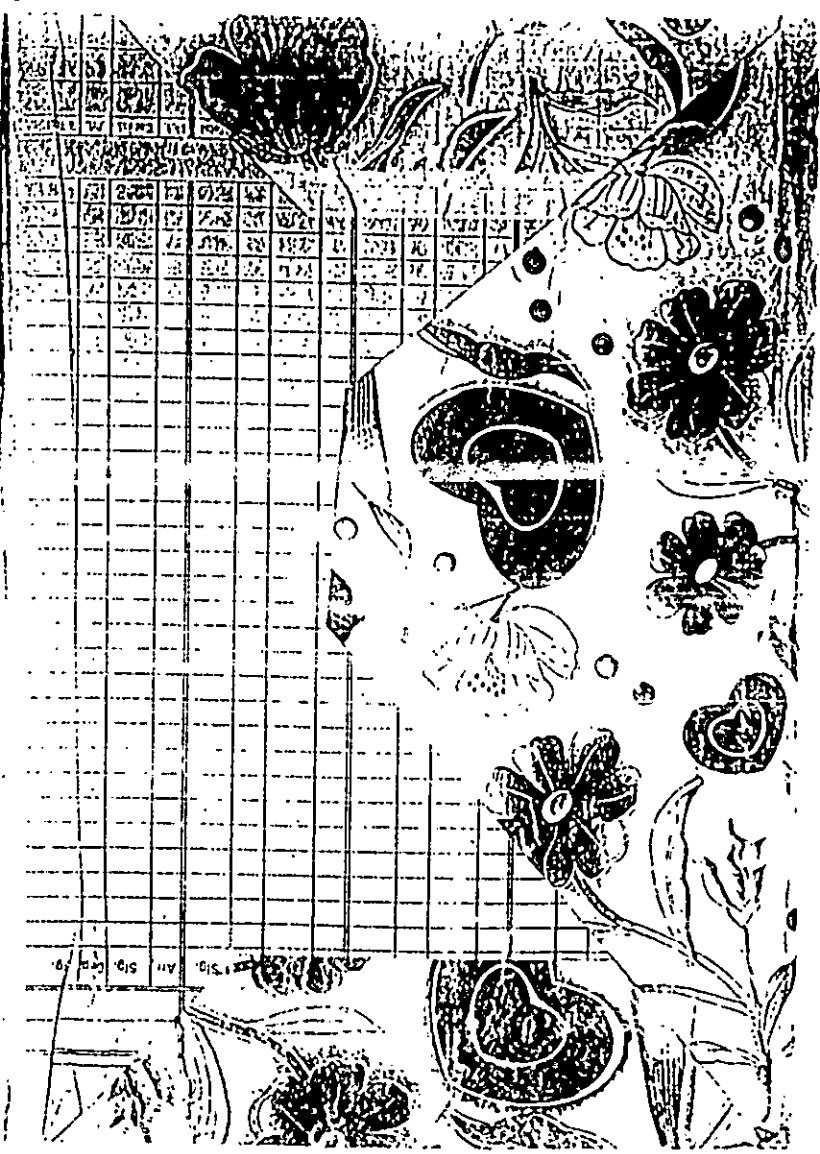
11/10/17
 Head Teacher
 (Signature)

Head to be filled
 (Signature)
 Head to be filled
 (Signature)

TEACHER'S ATTENDANCE REGISTER
 For the month of January 2011

Name of Teacher: Khushi
 Date of Birth: 15/05/85
 F.A. No. 1000

Sl. No.	Date	Present		Absent		Remarks
		AM	PM	AM	PM	
1	1/1/11	P	P	A	A	
2	2/1/11	P	P	A	A	
3	3/1/11	P	P	A	A	
4	4/1/11	P	P	A	A	
5	5/1/11	P	P	A	A	
6	6/1/11	P	P	A	A	
7	7/1/11	P	P	A	A	
8	8/1/11	P	P	A	A	
9	9/1/11	P	P	A	A	
10	10/1/11	P	P	A	A	
11	11/1/11	P	P	A	A	
12	12/1/11	P	P	A	A	
13	13/1/11	P	P	A	A	
14	14/1/11	P	P	A	A	
15	15/1/11	P	P	A	A	
16	16/1/11	P	P	A	A	
17	17/1/11	P	P	A	A	
18	18/1/11	P	P	A	A	
19	19/1/11	P	P	A	A	
20	20/1/11	P	P	A	A	
21	21/1/11	P	P	A	A	
22	22/1/11	P	P	A	A	
23	23/1/11	P	P	A	A	
24	24/1/11	P	P	A	A	
25	25/1/11	P	P	A	A	
26	26/1/11	P	P	A	A	
27	27/1/11	P	P	A	A	
28	28/1/11	P	P	A	A	
29	29/1/11	P	P	A	A	
30	30/1/11	P	P	A	A	
31	31/1/11	P	P	A	A	



HS J
 ATTENDED 17/216

31

روز		وقت		وقت		وقت		وقت		وقت		روز
آد	دستخط	وقت	وقت	آد	دستخط	وقت	وقت	آد	دستخط	وقت	وقت	روز
P				P		19:35				7:00	12:35	1
P				P		12:35				7:00	12:35	2
P				P		12:35				7:00	12:35	3
P				P		11:30				7:30	11:20	4
P				P		12:35				7:20	12:35	5
P				P		SUNDAY						6
P				P		12:35				7:30	12:35	7
P				P		12:35				7:30	12:35	8
P				P		12:35				7:20	12:35	9
P				P		12:35				7:30	12:35	10
P				P		11:20				7:30	11:20	11
P				P		12:35				7:30	12:35	12
P				P		SUNDAY						13
P				P		12:35				7:30	12:35	14
P				P		12:35				7:30	11:30	15
P				P		12:35				7:30	12:35	16
P				P		12:35				7:30	12:35	17
P				P							11:20	18
P				P							12:35	19
P				P		SUNDAY						20
P				P							12:35	21
P				P							12:35	22
P				P							12:35	23
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												29
												30
												31

Mr. Kamran's appointment is face as per report of Deputy Director Lab.

19/11/2015

نظریہ

11/11/2015

S.I. Leave

Deputy Director
 Health Services
 District Hospital
 Rawalpindi

ATTESTED
 [Signature]

رجسٹری مڈلین

(37)

بابت ۵ نومبر ۲۰۲۰ء
 برائے سول سروس آف پاکستان

روز	آد	دستخط	روائی	دستخط	آد	دستخط	روائی	دستخط	آد	دستخط	روائی	دستخط	آد	دستخط	روائی	دستخط	آد	دستخط	روز
1																			SUNDAY
2																			
3																			
4																			
5																			
6																			
7																			C/Leave
8																			
9																			
10																			
11																			
12																			
13																			
14																			C/Leave
15																			SUNDAY
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29																			
30																			
31																			

ATTESTED
 17/11/20

OFFICE
 17/11/20

TRANS - AN TO MANIFEST
 TRANSFERRED CARDS No = 3852-517
 F No P-1-D EXPENDITURE 17/11/20



PSV (Passing) 348

ANNEXURE E

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

NO. SO (PE&SE) 43/APPT/PTC RULES/
POLICY/VOL II/2011
Dated June 7, 2011

To

1. The Directress,
Elementary and Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

2-28. All Executive District Officers,
(E&SE) in Khyber Pakhtunkhwa. *Swab*

Subject:

APPOINTMENT /POSTING AND TRANSFER OF PRIMARY
SCHOOL TEACHERS IN ELEMENTARY AND SECONDARY
EDUCATION DEPARTMENT.

Memo:

Please refer to the subject noted above.

2. Kindly find enclosed a copy of "The Khyber Pakhtunkhwa
(Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors
and Doctors) Regulatory Act, 2011". Section 3 of this Act provides as under:-

Appointment, Posting and Transfer of Primary School Teachers:

(1) The vacancy of primary school teacher shall be filled in from the
candidates belonging to the Union Council of their permanent residence
mentioned in their Computerized National Identity Card and domicile, on merit
and if no eligible candidate in that Union Council is available where the school is
situated, such appointment shall be made on merit from amongst eligible
candidates belonging to the adjacent Union Councils:

Provided that on availability of a vacancy, a primary school teacher, appointed
from adjacent Union Council, as referred to in this subsection, shall be transferred
against a vacant post in a school of the Union Council of his residence within a
period of fifteen days.

(2) Upon marriage, the primary school teacher on request may be transferred
to the school in the Union Council, where his spouse, ordinarily resides, subject to
the availability of vacancy.

(3) The primary school teacher shall be transferred to other school within the
Union Council on completion of tenure as may be prescribed or before
completion of tenure, subject to the policy of rationalization for maintaining
certain students teachers ratio, if any.

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(4) Government shall, within a period not exceeding one year of the commencement of this Act, make arrangement for posting of all the primary school teachers appointed prior to coming into force of this ACT, to the schools of their respective Union Councils or adjacent Union Council as the case may be.

2. The service rules relating to Primary School Teachers (PST) are being amended in accordance with Section 3 of the Act by E&SE Department.

3. You are, requested to implement the above provision of law while making appointment/recruitment of PST in your respective district. You are also requested to implement Section 3 (4) of the ACT within the stipulated period and furnish compliance report to this Department at the earliest.

Encl: As above.

(Muhammad Ayub Khan)
SECTION OFFICER (PRIMARY)

Copy alongwith a copy of ACT is forwarded for implementation to:-

- The Section Officer School (Male), E&SE Department.
- The Section Officer School (Female), E&SE Department.

HAS
ATTESTED (17/11/16)

(Signature)
SECTION OFFICER (PRIMARY)

EXTRAORDINARY
GOVERNMENT

REGISTERED NO. PIII
GAZETTE



KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, THURSDAY, 12TH MAY, 2011.

**PROVINCIAL ASSEMBLY SECRETARIAT
KHYBER PAKHTUNKHWA**

NOTIFICATION

Dated Peshawar, the 12/05/2011

No.PA/ Khyber Pakhtunkhwa/Bills/2011/26454 The Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Bill, 2011 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 2nd May, 2011 and assented to by the Governor of the Khyber Pakhtunkhwa on 10th May, 2011 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

THE KHYBER PAKHTUNKHWA (APPOINTMENT, DEPUTATION, POSTING AND TRANSFER OF TEACHERS, LECTURERS, INSTRUCTORS AND DOCTORS) REGULATORY ACT, 2011

(KHYBER PAKHTUNKHWA ACT NO. XII OF 2011)

(first published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa (Extraordinary), dated the 12th May, 2011).

to regulate by law appointment, deputation, posting and transfers of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and doctors in health facilities and to ensure

WHEREAS it is expedient to regulate by law appointment, deputation, posting and transfers at local level, of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and doctors in health facilities and to ensure

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[Signature]
17/5/11

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KHYBER PAKHTUNKHWA

Published by Authority

Peshawar, Thursday, 12th may, 2011.

**PROVINCIAL ASSEMBLY SECRETARIAT
KHYBER PAKHTUNKHWA**

NOTIFICATION

Dated Peshawar, the 12/05/2011

No.PA/ Khyber Pakhtunkhwa /Bills/2011/26454. The Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Bill, 2011 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 2nd may, 2011 and assented to by the Governor of the Khyber Pakhtunkhwa on 10th may, 2011 is hereby published as and Act of the Provincial Legislature of the Khyber Pakhtunkhwa .

**THE KHYBER PAKHTUNKHWA ((APPOINTMENT,
DEPUTATION, POSTING AND TRANSFER OF TEACHERS,
LECTURERS, INSTRUCTORS AND DOCTORS) REGULATORY
BILL, 2011.**

(Khyber Pakhtunkhwa Act NO.XII of 2011)

(first published after having received the assent of the Governor of the Khyber Pakhtunkhwa in Gazette of the Khyber Pakhtunkhwa (Extraordinary), dated the 12th may, 2011).

**AN
ACT**

To regulate by law appointments. Postings and transfers of teachers serving in primary, middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities.

Resemble --- whereas it is expedient to regulate by appointments posting and transfers at local level, to teachers serving in primary , middle, secondary and higher secondary schools, lecturers in colleges and instructors in technical institutions and doctors in health facilities and to insure the availability of teachers in schools, lecturers

*Attended
filed
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Provided that if no suitable and eligible candidate is available in the district concerned for appointment, then the candidates belonging to the neighbouring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section, "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or teacher who proceeds on training or long leave may be treated as vacant post for the purpose of contract or contingent appointment till the return of such employee from training or long leave and assumption of charge of the post.

Provided that the period of such training or long leave shall not exceed one year and no appointment on contract or contingent shall be made on the post which falls vacant for a period less than one year.

5. Initial posting. — (1) The doctors, lecturers, instructors subject specialists and teachers, upon their appointment shall be first posted in the periphery of the district whose quota they have been recruited, and they shall not be transferred for at least three years.

(2) Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. Deputation of Doctors.—(1) Government may allow deputation abroad for all categories of doctors only once in their entire service, for a period not exceeding three years.

(2) Deputation to "Foreign Service" within Pakistan shall be permissible only in respect of medical officers for a period not exceeding three years.

Provided that no further extension, on expiry of the tenure shall be given to the doctors who are already on deputation abroad or within Pakistan.

7. Postgraduate Medical Education.—(1) The Health Department, on the basis of objective need assessment and analysis, shall determine the number of Trainee Medical Officers (TMOs) in Postgraduate Medical Institute (PGMI) and Junior in Tertiary Care Hospitals every year. This stipulated number shall not exceed in any case.

(2) Any doctor selected or permitted for postgraduate medical training shall be treated on leave without pay and may be entitled only for stipend fixed by Government from time to time for such training.

ATTESTED 17/5/11

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Provided that if no suitable and eligible candidate is available in district concerned for appointment, then the candidates belonging to the neighboring districts shall be considered for appointment in the order of their merit.

(2) Save as the appointment made under proviso of this section. "ad hoc appointee" shall serve in the district of his domicile.

(3) The post of a doctor, lecturer, instructor, subject specialist or teacher who proceed on training or long leave may be treated as vacant post for the purpose of contract of contingent appointment till the return of such employee for training or long leave and assumption of charge of the post:

Provided that the period of such training or long leave shall not be less than one year and no appointment on contract or contingent shall be made on the post which may fall vacant for a period less than one year.

5. initial posting.— (1) The doctors, lecturers, instructors subject specialist of teachers, upon their appointment shall be first posted in periphery of the _____ whose quota they have been recruited, and they shall not be transferred for a _____ at least three years.

(2). Upon expiry of the tenure as referred to in sub-section (1), transfer shall be made only upon the availability of substitute.

6. deputation of Doctors:— (1) Government may allow deputation abroad for all categories of doctors only once in their entire service , for a period not exceeding three years.

(2). Deputation to "Foreign Service" within Pakistan shall be permissible and in respect of medical officers for a period not exceeding three years:

Provided that on further extension, on expiry of agreed tenure shall be given to doctors who are already on deputation abroad or within Pakistan.

7. Postgraduate Medical Education:— (1) The Health Department, on the basis of objective need assessment and analysis, shall determine the intake number of Trainee Medical Officers (TMOs) In Postgraduate Medical Institute (PGMI) and _____ in tertiary Care Hospitals every year. This stipulated number shall not _____ any case.

(2) Any doctor selected or permitted for postgraduate medical trainer shall be treated on leave without pay and may be entitled only for stipend fixed by Government form time to time for such training.

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(3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribed by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of his domicile and in case of non-availability of a post in the district of domicile, he shall serve for three years in the rural area.

(4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.

(5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty, failing which the amount shall be recovered from him or from the guarantor, as the case may be.

8. Provisions relating to doctors apply to lecturers and instructors. —The provisions relating to doctors in section 7 of this Act shall mutatis mutandis apply to lecturers and instructors.

9. Act to over-ride other laws. —The provisions of this Act shall have effect notwithstanding any thing contained in any other law for the time being in force.

10. Jurisdiction barred. —Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. I of 1974), no order made or proceedings undertaken under this Act, or the rules made there under or any officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.

11. Removal of difficulties. —Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.

12. Power to make rules. —Government may make rules for carrying out the purposes of this Act.

BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(AMANULLAH)

Secretary
Provincial Assembly of Khyber Pakhtunkhwa

Printed and published by the Manager,
Secy. & Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar.

ATTEST: 07/17/2011

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DA (F) PST 12
DA (M) PST 13
DA (F) PST 14
DA (M) PST 15

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(3) A doctor selected or permitted for postgraduate medical training shall provide surety bond prescribe by Government ensuring that upon completion of his studies for which he was initially selected, shall compulsorily serve for three years in the district of his domicile and in case of non-availability of a post in district of domicile, he shall serve for three years in the rural area.

(4) For the purpose of sub-section (3), the doctor shall also provide guarantee of two government officers.

(5) In case of violation of sub-section (3), Government shall serve one month notice upon the doctor for resumption of duty, failing which the amount shall be recovered from him or from the guarantor, as the case may be.

8. **Provision relating to doctors apply to lecturers and instructions.**---- The provision relating to doctors in section 7 of this Act shall mutandis apply to lecturers and instructors.

9. **Act to over-ride other laws.**---- the provisions of this Act shall have effect notwithstanding any thing contained in any other law for the time being in force.

10. **Jurisdiction barred.**---- Save as provided under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973), the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 and the Khyber Pakhtunkhwa Service Tribunal Act, 1974 (Khyber Pakhtunkhwa Act No. 1 of 1974), no order made or proceeding undertaken under this Act, or the rules made there under or many officer authorized by it shall be called into question in any Court, and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance or by any power conferred by or under this Act or the rules.

11. **Renewal of difficulties.**--- Government may, by order, provide for the removal of any difficulty which may arise in giving effect to the provisions of this Act.

12. **Power to make rules.**--- Government may make rules for carrying out the purpose of this Act.

BY ORDER OF MR.SPEAKER
Provincial Assembly of Khyber
Pakhtunkhwa

Handwritten signature and date
27/11

(AMANULLAH)
Secretary
Provincial Assembly of Khyber Pakhtunkhwa



OFFICE OF THE DISTRICT EDUCATION OFFICER,
(MALE) KOHISTAN.

ANNEXURE F

No. 02/21/Enquiry Dated: 02/12/2014

To

Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

ADDE
3/12/2014

Subject: INQUIRY REPORT REGARDING PROMPT ACTION AGAINST THE TEACHERS APPOINTED IN DISTRICT KOHISTAN

Memo: Reference your letter issued under Endst No. 825729, F.No. 20/f teachers enquiry division dated 09/10/2014, the enquiry report on the subject matter is as under.

Background/ TOR

To probe into the matter on the subject cited above in R/O the following PST teachers who were appointed in District Kohistan and later on they were transferred to District Swabi.

- | | | |
|--------------------------|------------------------|-----------------------|
| 1. Mst Nuzhat PST. | 2. Mst Nazia Qazi PST | 3. Mst Alia Ghafoor |
| 4. Mst Ruqia PST. | 5. Mst Sara PST | 6. Mst: Khus Numa PST |
| 7. Mst Mussarat Bibi PST | 8. Mst Anila Iqbal PST | |

Procedure.

1. Consultation with DEO (F) and SDEO (F) in Chair.
2. Collection of relevant record/ information from DEO (F) and SDEO (F) in Chair.
3. Validation of record/ information from District Accounts Officer Kohistan.

Facts.

- i. Mst Nuzhat Begum PST :**
 - a. She was appointed as PST at GGPS Yazai vide appointment order issued Endstt No. 3189-94 dated 31.07.2009 and she took over the charge on the same day at GGPS Kass Banda instead of GGPS Yazai. After taking over charge she was again adjusted at GGPS Banjar Yanjool w.e.f 01-03-2011 vide EDO E&SE Kohistan Ho. 741-49 dated 22-04-2011.
 - b. The source I for the release of pay was verified from District Accounts Office Kohistan in the M/O 5/2011 along with the adjustment of arrear of pay for the M/O 3-4/2011, it mean that she could not get salary from date of appointment to 02/2011. (19 months).
 - c. That indicates that she was appointed without the availability of post and she was adjusted in at GGPS Banjar Yanjool.
 - d. She was appointed only on pick and chooses method.
 - e. She was appointed on single hand written application.
- ii. Mst: Nazia Qazi PST:**
 - a. Mst Nazia Qazi D/O Qazi Abdul Haq was appointed as PST GGPS Bar Komila vides appointment order issued under Endst No. 8836-42 dated 07/12/2006 and She took over the charge on the same day.
 - b. According to merit list for the 2006, she falls at serial No. 28 being only SSC.
 - c. No other record of Nazia Qazi such as photocopy of service book, appointment order is available in the office of DEO and SDEO (F).
 - d. She was appointed only on pick and chooses method.
 - e. She was appointed on single hand written application.

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iii. Mst Alia Ghafoor PST:

- a. Mst Alia Ghafoor D/O Ghafoor Gul R/O of District Swabi was appointed as pst at GGPS Kass Banda Vide appointment order issued Endstt No.3189-94 dated 31.07.2009 and took over the charge on the same day.
- b. She was again adjusted at GGPS Yanjool w.e.f 01-03-2011 vide EDO E&SE Kohistan No.741-49 dated 22-04-2011.
- c. The source I for the release of pay was verified from District Accounts Office Kohistan in the M/O 5/2011 along with the adjustment of arrear of pay for the M/O 3-4/2011.
- d. It mean that she could not get salary from date of appointment to 02/2011 (19 months) that indicate that she was appointed without the availability of post and on the availability of post she was adjusted in at GGPS Yanjool.
- e. She was appointed only on pick and chooses method.
- f. She was appointed on single hand written application.

iv. Mst Ruqia PST:

- a. Mst Ruqia Begum D/O Mustafa Gul R/O of District Swabi was appointed as pst at GGPS Kass Banda Vide appointment order issued Endstt No.3189-94 dated 31.07.2009 and took over the charge on the same day.
- b. After taking over charge she was again adjusted at GGPS Dassu w.e.f 01-03-2011 vide EDO E&SE Kohistan No.741-49 dated 22-04-2011.
- c. The source I for the release of pay was verified from District Accounts Office Kohistan in the M/O 5/2011 along with the adjustment of arrear of pay for the M/O 3-4/2011 it mean that she could not get salary from date of appointment to 02/2011 (19 months) that indicate that she was appointed without the availability of post she was adjusted at GGPS Dassu.
- d. She was appointed only on pick and chooses method.
- e. She was appointed on single hand written application.

v. Mst Sara PST:

- a. Mst Sara Begum D/O Fazal Yazdan R/O Mardan (Swabi) was appointed as PST GGPS Kundal vide DEO (F) Kohistan appointment order issued under Endst No.827-33 dated 2/2/1996 being SSC and PTC and as per entry in the service book she took over the charge on 3/2/1996.
- b. As per entry in the service book the pay of the said teacher was released vide DEO (F) Letter No. 6071-73 dated 12/10/2010 in the period w.e.f. 01/12/2006 to 3/4/2012 (41 Months) as treated as EOL without pay and the period w.e.f date of appointment 30/11/2006 is not traceable for the month of October 2010.
- c. As per entry in the service book, the source I for the release of salary was verified from District Accounts Office for the month of 11/2010, the pay of the teacher for the period 1/5/2010 to 31/10/2010 has already been drawn.
- d. She was appointed on 2/2/1996 and got the salary w.e.f 1/5/2010, that indicates that she remained without salary from 2/2/1996 to 30/4/2010 (14 years & 3 Months)
- e. It is astonishing that how the appointment is valid.
- f. She was appointed only on pick and chooses method.
- g. She was appointed on single hand written application.

vi. Mst Khush Numa PST:

- a. Mst Khush Numa D/O Khurshid Ahmad R/O Swabi was appointed as PST at GGPS Dobair Village being only SSC Vide appointment order issued under Endst No.539-44 dated Kohistan 2/12/2009 and she took over the charge in the school on 3/12/2009.
- b. She was again adjusted at GGCMS Jijal vide adjustment order issued under Endst No. 8004-6 dated 09/10/2010 at serial No. 13 of the order.
- c. As per entry in the service book the source I for the release of salary was verified from

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- d. She was appointed being low academic qualification.
 - e. She was transferred from Kohistan on 8/1/2011 and she got the salary for only 2 month from Kohistan.
 - h. She was appointed only on pick and chooses method.
 - i. She was appointed on single hand written application.
 - vii. **Mst Mussarat Bibi PST:**
 - a. Mst Mussarat Bibi D/O Hazrat Wali was appointed as PST at GGPS Badar Shaha vide appointment order issued Endst No.1135-40 dated 1/2/1996 w.e.f 1/5/1996.the order was issued in advance and as per entry in the service book she took over the charge on 1/5/1996.
 - b. She was appointed being only SSC with 342/850 marks less than 40% in 3rd division. She was appointed on simple hand written application without merit list and without other coddles formalities.
 - c. She was appointed with a very low academic qualification.
 - e. She was appointed on simple hand writing application
 - f. She was appointed by pick and chooses method
 - g. No other record is available for further verifications.
 - viii. **Mst.Nadia Qazi**
 - a. Mst.Nadia Qazi D/O Qazi Fazal Haq was appointed as PST GGPS bar Kornila vide appointment order issued under End: No.8836-42 dated 07-12-2006
 - b. According to the merit list of Female candidates for the year 2006, she falls at S.No.28/06 being SSC.
 - c. She was appointed on simple hand writing application
 - d. She was appointed by pick and chooses method
 - e. No other record is available for further verifications.
- The score of all these candidates has been changed/ inserted in pen writing and has been changed and the appointments were made randomly and disorderly.

Findings


1. The appointments were made without the availability of vacant post and the submission of charge reports is merely the paper work that is why the source I for the release of salary was verified after the issuance and adjustment in 2nd orders.
2. The appointments were made with poor/ relaxed criteria with the intension to induct the candidates and leave out them from District Kohistan as soon as possible and the similar has been done.
3. The appointments were made to use District Kohistan as a launching bad/ back door for accommodating academically poor candidates.
4. The appointments were made on pick and choose policy.
5. The appointments were made in piece-meal by violating the rules.

Photocopy of appointment orders, charge report, pages of service books and merit lists for the year 2006 and 2008 are attached here with as Annexure "A" & "B".

Recommendations.

After perusal of available record, facts and findings, the following recommendations are made.

1. The appointments are illegal and irregular and against the recruitment rules / policy, the appointing authority could not absolve himself from the responsibilities hence departmental proceeding/ legal action may be initiated against the appointing authority.
2. The appointments of above mention teachers are illegal and irregular hence liable to be withdrawn / cancelled / terminated.


Riasat Khan
(District Educational Officer
(Male) Kohistan)

21/1/14

ATTESTED

(42)

OFFICE OF THE DISTRICT EDUCATION OFFICER, (F) KOHISTAN.

Ph: & Fax No. 0998 07225

OFFICE ORDER..

ANNEXURE

In compliance with the Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar letter No.3081/ No.20 (F) enquiry dated 16/03/2015, Reminder No. 2200/F No.20/(F) enquiry dated 20/04/2015; N. 3530/ F No.20/(F) enquiry dated 22/05/2015, and No.3696/F No.20/(F) enquiry Dated 24/08/2015 and In light of recommendation of enquiry officer, the following PST teachers are hereby removed from service with immediate effect.

S/NO	Name	School
1	Nuzhat PST	School
2	Nazia Qazi PST	GGPS Kas banda
3	Alia Ghafoor	GGPS Ar komila
4	Ruqia PST	GGPS Kas banda
5	Sara PST	GGPS Kas banda
6	Khushnuma PST	GGPS Kundal
7	Mussarat bibi PST	GGPS Dabair
		GGPS Badar shaha

District Education Officer
(Female) Kohistan

E/No, /Estab: 7/05-10 /DEO (F) KH: dated 27/11/2015

Copy of the above is forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. The District Education Officer (F) Distirct Swabi for necessary action at her end as the above teachers are now posted in District Swabi.
3. The District Accounts Officer, Swabi.
4. The District Accounts Officer, Kohistan.
5. The Sub Divisional Education Officer (F) kohistan.
6. Office record .

[Signature]
ATTESTED 17/11/16
 District Education Officer
 (Female) Kohistan

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NOTIFICATION

The transfer orders of the following teachers from District Kohistan to District Swabi issued vide this office Endst. No. detail given below are hereby withdrawn due to their illegal and irregular appointments as per report of the inquiry officer vide letter No. 02 dated 27-2-2014.

S.N	Name of Teacher	From District Kohistan	To District Swabi	Endst. No.
1	Alta Ghafoor PST	GGPS Yanjoal	GGPS Battal No. 2 Banjar	Endst. No. 2511-15 dated 19-10-2011
2	Rajim PST	GGPS Mada Kheh	GGPS Haryan Banda	Endst. No. 2511-15 dated 19-10-2011
3	Mahar PST	GGPS Yanjoal	GGPS Haryan Banda	Endst. No. 2527-31 dated 24-11-2010
4	Khanzad PST	GGCMS Kohistan	GGPS Hayatabad Jijal	Endst. No. 985-0-1 dated 08-01-2011
5	Mazhar Qazi PST	GGPS Bar Komila	GGPS Bahadar Kati Razi	Endst. No. 4980-85 dated 20-09-2011
6	Sana PST	GGPS Saglo	GGPS Dheri Dheri	Endst. No. 1599-1605 dated 15-02-2011
7	Musarat PST	GGPS Abad Sao	GGPS Palosai Samad	Endst. No. 7490-95 dated 27-09-2008
8	Azeela PST	GGPS Roz	GGPS No. 1 Dheri Gaudal	Endst. No. 505-10 dated 08-10-2010

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst. No. 20/11/15 JF. No. 20/11/15 Inquiry dated Peshawar 12/11/2015

- Copy to the:-
1. District Account Officer Swabi & Kohistan.
 2. District Officer (Female) Swabi & Kohistan.
 3. Teacher Concerned.
 4. P.A to Director Local Office

Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa

19/11/15

noted on
12/11/2015
notify to acc ASDCO
C. S. Khan
S. S. Khan
(1)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWABI

Endst. No. 20/11/15 DA-1 (Estab) Dated Swabi the 12/11/2015
Copy of the above is forwarded for information and district compliance to the:-

1. Sub-Divisional Education Officer (Female) Lahor, Swabi and Topi.
2. District Accounts Officer Swabi.

DISTRICT EDUCATION OFFICER (FEMALE) SWABI

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (FEMALE) LAHOR

Endst. No. 16/11/2015 Dated Lahor the 16/11/2015
Copy of the above is forwarded for information and district compliance to the:-

1. District Education Officer Female Swabi w/r to her Endst. No. 20/11/15 to above.
2. All concerned teacher from SNO: 1 to 5.

AS
ATTESTED 17/11/16

12/11/2015

OFFICE OF THE DIRECTOR OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

NOTIFICATION

The transfer orders of the following teachers from District Kohistan to District Swabi issued vice this Office Endst No. detail given below are hereby withdrawn due to their illegal and irregular appointments as per report of the inquiry officer vide letter No.02 dated 02.12.2014.

S. No.	Name of teacher	Form	District Kohistan	To District Swabi	Ednst. No.
1.	Alia Ghafoor PST	GGPS	Banjar Yanjool	GGPS Battai No.2	Endst. No.2511-15 Dated 19.10.2011
2.	Ruqia PST	GGPS	Mada Khel	GGPS Haryan Banda	Endst. No.2511-25 Dated 17.10.2011
3.	Nazhat PST	GGPS	Banjar Yanjool	GGPS Haryan Banda	Endst. No.2527-31 Dated 24.11.2010
4.	Khushnama PST	GGCMS	Jijal Kohistan	GGPS Hayatabad	Endst. No.985-90 Dated 08.01.2011
5.	Nazia Qazi PST	GGPS	Bar Komila	GGPS Razi Bahadar Koti	Endst. No.4980-85 Dated 20.09.2011
6.	Sara PST	GGPS	Sagle	GGPS Dhola Yaoobi	F.No.1955-1605 Dated 15.02.2011
7.	Mussarat PST	GGPS	Samad Abad Sao	GGPS Palosai	Endst No.7490-95 Dated 27.09.2008
8.	Aneela PST	GGPS	Koz	GGPS No.1 Dheri Gandaj	Endst No.505-10 Dated 08.10.2010

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

Enst No.3887-84/F.No.20/(F) Enquiry date

Copy to the

1. District Account Officer Swabi & Kohistan
2. District Officer (Female) Swabi & Kohistan
3. Teacher Concerned.
4. P.A to Director Local Office

Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa

Office of the District Education Officer (Female) Swabi
Endst. No.3090-4/DA-1(Estab) dated Swabi the 12/11/2015

Copy of the above is forwarded for information and strict compliance to the:

1. Sub Divisional Education Officer (Female), Lahor, Swabi and Topi.
2. District Account Officer Swabi.

District Education Officer
(Female) Swabi

Office of the Sub Divisional Education Office female Lahor.
Endst.No.1479-80 dated Lahor the 16.11.2015

Copy of the above is forwarded for information and strict compliance to the:

1. District Education officer Female Swabi w/r to her Endst. Refer to above.
2. All concerned teacher from SNO.1 to 6.

اگست 1953

2015/11/11 تاریخ

مخانب: ایس ڈی ای او (زنانه) احمد علی زردی

- (1) تربیت سیکم دفتر سیرا فیسر گاؤں سردھنہ تحصیل راجھ پور
- (2) فروشنا سیکم دفتر سیرا فیسر گاؤں جھانڈا تحصیل راجھ پور
- (3) نازبہ فاضلہ دفتر فاضلہ الحق گاؤں ڈنگی تحصیل راجھ پور
- (4) سارا دفتر تحصیل نردان محلہ بارہ پوتی سندھری گاؤں بارہ پوتی مردین

معمون: مسنوفی ٹرالفیسر آرڈر / اوسوی سرورس بکس

باداشت: بحوالہ آرڈر نمبر 84-3887 مورخہ 22/10/53 از دفتر ڈائریٹر تعلیمات صوبہ پسر پختون خواہ لیٹاور آب تمام کے ٹرالفیسر آرڈر مسنوفی ہو سکے ہیں۔ لہذا آب تمام کو ہدایت کی جاتی ہے کہ فوراً دفتری اوقات کار میں زبردستی خطی اپنے سیکم / اسیٹیٹنٹ کے پاس آئے سرورس بکس وصول کریں۔

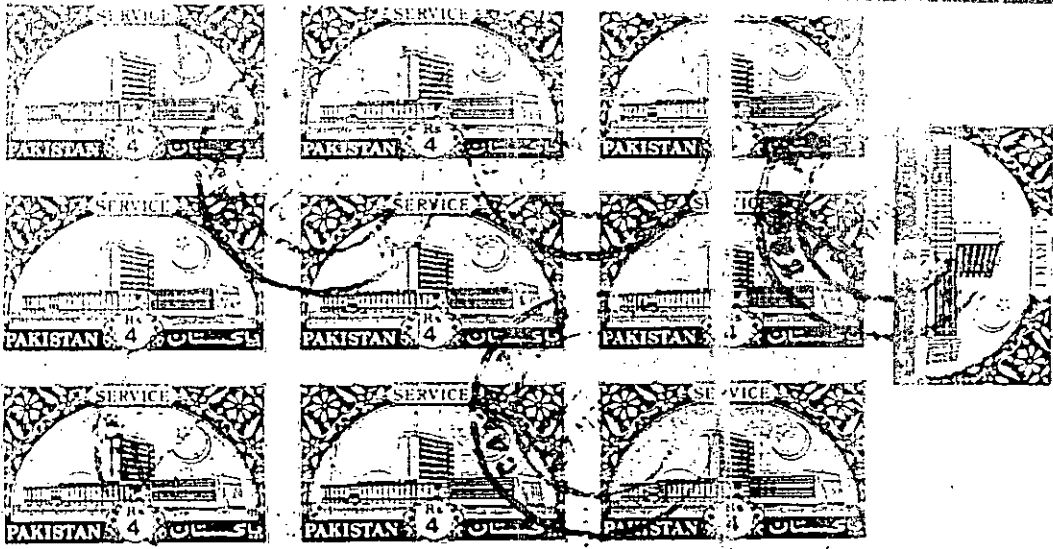
فیسری آب راجھ پور کے لیے سرورس بکس - لیٹ پورنگی

Sub-Inspector, District Office, Peshawar

ایس ڈی ای او (زنانه) احمد علی زردی اور سارا فیسر

ATTESTED 17/12/16

Sub-Inspector, District Office, Peshawar



Ops Registered

فرستہ بہ خیر فوریہ "کاف و ددر" خانہ کتب و نسخہ
K hushnama Begum D/o Khushaid Ahmad village
Po. Jehangira Tehsil Cahr (Distt: Swabi)
ک ا

PA 1122
CAN.

To

The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

11
RECEIVED

RECEIVED

H

Subject:- APPLICATION FOR A DECLARATION/ORDER TO THE EFFECT THAT THE IMPUGNED ORDER OF DEO (F) KOHISTAN DATED 22/10/2015 MAY PLEASE BE DECLARED AS ILLEGAL, UNLAWFUL AND THUS ON THE RIGHT OF APPLICANT AND CONSEQUENTLY THE SAME MAY PLEASE BE SET ASIDE AND THE APPLICANT MAY BE ALLOWED TO PERFORM HER DUTY AS PST JAHANGIRA

Respected Sir,

The applicant most humbly submitted as under:

1. That the applicant is the R/O Jahangira, District Swabi, KPK, Pakistan.
2. That the applicant had been appointed as PST Vide Order of Education department. The Departmental Selection Committee after scrutinizing the whole record, recommended for appointment. It is also worth to mention here that the applicant assumed the charge against the PST Post in respective school and in this regard necessary entries have been made in my service book already maintained by the office of DEO (F) Kohistan and worked up-to entire satisfaction of student as well as of high ups. (Copy of appointment Order annexed).
3. That in meanwhile an ACT was introduced to adjust/transfer all PST in their respective Union Council; resultantly the applicant was transfer to her parent District Swabi. Vide order dated 08/01/2011, after observing all codal formalities i-e obtaining No Objection Certificate from both Districts.
4. That since 15/02/2011 the applicant performing her duties efficiently and devotedly with up-to entire satisfaction of student as well as of high ups in District Swabi.
5. That the applicant was shell shocked when on 22/10/2015, the applicant was on duty at District Swabi and DEO(F) Kohistan removed the applicant from service "Purely on political ground" with a single pen stroke and the impugned order has been passed at my back, as I was not on the strength of DEO (F) Kohistan. (Copy annexed).
6. That surprisingly, as admitted the D. O (F) Kohistan in Writ Petition No.810-P/2012 that the applicant is fully qualified having the requisite qualification of the respective post and the appointment was made on merit duly recommended by the DSC, therefore the impugned order is unjustified, without reasons and not sustainable under the law liable to be set aside.

Keeping in view the above mentioned facts, It is most humbly requested that the impugned order dated 22/10/2015 may please be declared as illegal, unlawful and thus on the right of applicant and consequently the same may please be set aside and the applicant may be graciously be reinstated into service with all back benefits.

Date: 26-11-2015

17/11/15

Mst. Khushnava
26/11/15
CCPS Jahangira District, Swabi

No. 604

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

(46)

Received a registered* addressed to _____ Date-Stamp _____

Initials of Receiving Officer _____ *Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. Insured for Rs. (in figures) _____ (in words) _____

If insured

Insurance fee Rs. _____ Ps. _____ Weight _____ Grams Name and address of sender _____

No. 605

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

60

Received a registered* addressed to _____ Date-Stamp _____

Initials of Receiving Officer _____ *Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. Insured for Rs. (in figures) _____ (in words) _____

If insured

Insurance fee Rs. _____ Ps. _____ Weight _____ Grams Name and address of sender _____

HAS' J ATTESTED 17/2/16

see reverse.

(47)

Annex 1

IN THE PESHAWAR HIGH COURT, PESHAWAR

In Ref of
W.P. No. 676 P/2016



Khushnama Primary School Teachers
Govt. Girls Primary School,
Jahangira District Swabi.....**Petitioner**

VERSUS

1. Secretary Education, Govt. of Khyber Pakhtunkhwa
Civil Secretariat, Peshawar
2. Director Education, Khyber Pakhtunkhwa,
Peshawar
3. Deputy Director (Establishment) Elementary &
Secondary Education Khyber Pakhtunkhwa
Peshawar
4. District Education Officer (F) District Swabi.
5. District Education Officer (F) District Kohistan

.....**Respondents**

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973,**

Respectfully Sheweth:-

FILED TODAY
Deputy Registrar
20 FEB 2016

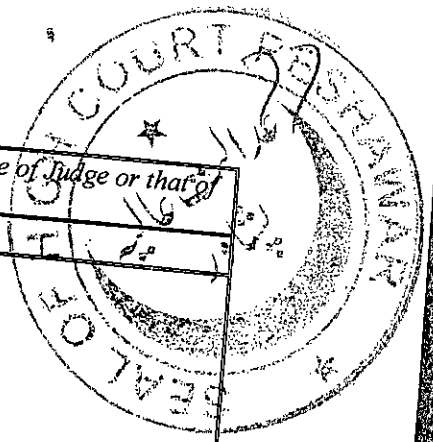
1. That the petitioner is the resident of District Swabi
and is a Primary School Teachers (PST) performing
her duties at Govt. Girls Primary School (GGPS)
Hayatabad Jahangira District Swabi.

ATTESTED
EXAMINER
Peshawar High Court
22 MAR 2016

(48)

PESHAWAR HIGH COURT PESHAWAR

ORDER SHEET



Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
1	2	3
	18.3.2016	<p style="text-align: center;"><u>W.P No. 676-P/2016.</u></p> <p>Present:</p> <p style="text-align: right;">Mr. Hazrat Said, Advocate for petitioner.</p> <p style="text-align: center;">*****</p> <p><u>ROOH-UL-AMIN KHAN, J:-</u> Petitioner has filed the instant writ petition under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, praying that:-</p> <p style="text-align: center;">“ It is, therefore, humbly prayed that on acceptance of this writ petition the order dated 22.10.2015 may please be declared illegal, unlawful, without lawful authority and jurisdiction and the petitioner be allowed to perform duties at the school of her posting with cots throughout.”</p> <p>2. Undoubtedly, the petitioner was appointed vide order dated 2.12.2009 whereas terminated from the service on 22.10.2015 against which departmental appeal has been filed on 26.11.2015. Perusal of record would reveal that the petitioner after appointment has attained the status of Civil Servant and as such has performed her duties uptill the date of her</p>

Rooh-ul-Amin Khan

ATTESTED
EXAMINER
Peshawar
22 MAR 2016

termination. In such like matter jurisdiction of this Court is expressly barred under Article 212 (3) of the Constitution of Islamic Republic of Pakistan, 1973. Learned counsel for the petitioner when confronted with the above situation, he could not wriggle out of the same, however stated that since the order of appointment of petitioner has been withdrawn, therefore, this petition has been filed before this Court under misconception.

3. In view of the above, this writ petition is disposed of accordingly, however the petitioner is at liberty to approach the proper forum i.e. Khyber Pakhtunkhwa Service Tribunal, if so desire.

sf Rodrul Amin Khan. *J*
sf Syed Ahsan Shah. *J* JUDGE

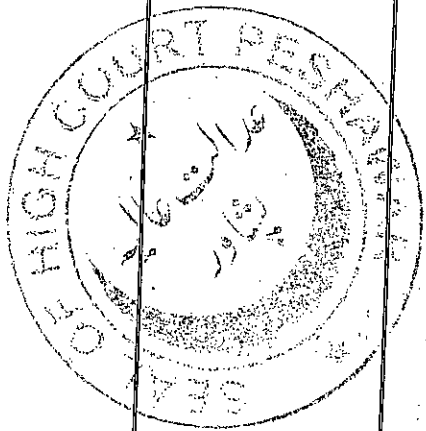
J
 JUDGE

Announced on;
 18th of March, 2016.

CERTIFIED TO BE TRUE COPY

Examiner
 Peshawar High Court, Peshawar
 Authorised Under Article 87 of
 The Qanun-e-Shahadat Order 1984

22 MAR 2016



[Handwritten signature]

19/3/16

20493

No.

Date of Presentation of Application *19-03-16*

No of Pages *7P*

Copying fee

Urgent Fee

Total *14.00*

Date of Preparation of Copy *22-03-16*

Date Given For Delivery *22-03-16*

Date of Delivery of Copy *22-03-16*

Received By *[Signature]*

بعدالت

سندھ ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ

Appellant 2016

معاہدہ خوشام بینام سیکرٹری ایجوکیشن

موردہ
مقدمہ
دعویٰ
جزم

باعت تبریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی مصلحت
 آراء استقامت کے لئے حضرت سیدہ عائشہ بنت ابی بکر کی طرف سے
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث فیصلہ برخلاف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور صولی چیکٹ ذرا پیسہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا سائن
 پر و اختیارات منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا کالت نامہ لکھ دیا کہ سندر ہے۔

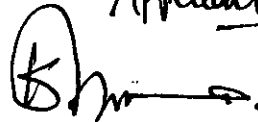
المرقوم 50 ماہ اپریل 2016

واہ العی

کے لئے منظور ہے۔

بمقام

Appellant Signature

18-1-17

**BEFORE THE KHYER PAKTUNKHAWA SERVICE
TRIBUNAL, PESHAWAR**

Service appeal No.453/2016

Mst. KhushnamaAPPELLANT

VERISUS

Govt: of KPK and others.....RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF 5THE KHYBER
PAKTUNKHAWA SERVICE TRIBUNAL ACT, 1974,**

Respectfully Sheweth,

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

No.1 to 5 AS UNDER:-

**Writ Petition
INDEX**

S.No	Description documents	of Annexure	Pages
1.	COMMENTS		1-4
2.	Affidavit		
3.	LETTER OF INQUIRY	A	
4.	Inquiry Report	B	
5.	Letter of Respondent No. 1 to Respt 2	C	
6.	Removal order and Inter District order	D & E	


DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN

**BEFORE THE KHYER PAKTUNKHAWA SERVICE
TRIBUNAL, PESHAWAR**

Service appeal No.453/2016

Mst. KhushnamaAPPELLANT

VERISUS

Govt: of KPK and others.....RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF 5THE KHYBER
PAKTUNKHAWA SERVICE TRIBUNAL ACT, 1974,**

Respectfully Sheweth,

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

No.1 to 5 AS UNDER:-

PRELIMINARY OBJECTIONS.

1. That the appellant is not an aggrieved persons.
2. That the appellant has got no cause of action/locus standi to file the instant Appeal.
3. That the Appeal is not maintainable in the present circumstances of the issue.
4. That the appellant has concealed the material facts from Hon'ble Tribunal.
5. That the appeal is time barred and not maintainable in eye of Law.
6. That the appeal is groundless and based on malafide, hence the same is liable to be dismissed.
7. That the appellant has estopped by her own conduct.
8. That the serviceappealis against the facts, prevailing rules and policy.

FACTUAL OBJECTIONS.

1. No comments
2. Para No.1 is incorrect, the appointment order of appellant is illegal, fictitious, she had indulged into the Government Service fraudulently. In such illegal

appointments, the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar was initiated an enquiry whereby *"the Mr. Riyast BS-19 District Education Officer was appointed an Inquiry Officer to conduct an Inquiry Of Eight (8) PST Teachers appointed in District Kohistan and then transfers to District Swabi to verify as to whether they have been appointed legally or Illegally"* vide Notification Endst No. 826-29 dated 09-10-2014 (**Annexure A**). That an Inquiry Office conducted an Inquiry and submitted reports regarding the appointment of eight PST including the appellant, wherein the committee recommended to the extent of the appellant that at S.No (VI) in enquiry report *(a). Mst. Khushnama PST D/O Khurshid Ahmad was appointed as PST at GGPS Bar Dubair Village vide appointment order issued Endst: No. 539-44 dated 02-12-2009. (b) She was appointed on simple hand written application without merit list and without code formalities (d) She was appointed by pick and chooses method (e) she was appointed being low academic qualification. No other record is available for further verification.* That after perusal of available record, facts and finding, the an inquiry office has made the following recommendation as

- 1. The appointment orders are illegal and irregular and against the recruitment policy/ rules. The appointing authority could not absolve himself from the responsibilities, hence Department proceeding/legal action may be initiated against the appointing authority.**
- 2. The appointments of above mention teachers (including appellant) are**

**illegal and irregular hence liable to be
withdrawn / cancelled / terminated.**

(Inquiry Report as Annexure B)

That an Inquiry Report mention ibid was sent to Respondent No. 2 by the Respondent No. 1 for implementation and further process in according to report of Inquiry Office vide latter No. 3081 dated 16-03-2015, **(Annexure C)** On the bases on inquiry ibid Removal form Service Orders of all Eight PST including appellant were issued by the Respondent No. 2, vide Office Order No. 7105-10 dated 22-10-2015, **(Annexure D)**

3. Para No. 3 is incorrect, as the factual position has already been explained, that appointment order was faked the appellant did not stand in the merit anywhere, as per report of the inquiry Officer the transfers orders of the all the teachers from District Kohistan to District Swabi issued by the Director, Elementary & Secondary Education Khyber Paktunkhwa Peshawar Respondent No. 1 was withdrawn due to their illegal and irregular appointments vide Notification Endst. No. 3887-84 dated 22-10-2015. **(Annexure E)**
4. Para No. 4 is incorrect, reply is already given in above Paras.
5. Para is correct but after report of the inquiry officer withdrawn of Inter District transfer orders and issued removal from service orders.
6. Para is in correct, but after report of the inquiry officer the department followed by inquiry officer recommendations (appointment order of appellants faked, illegal, out of merit, contrary to the rules and policy of the Government) and withdrawn of Inter District transfer orders and issued removal from service orders and issued removal from service orders.
7. As stated above Para No.6.
8. As stated above Para No.6.
9. Para is incorrect, the departmental appeal of appellant was rightly, has rejected by Respondent No. 1. As per rule Whereas the appellant has no right to invoke the jurisdiction of this Hon'ble Tribunal No comments.
10. Para 10 is Correct.

GROUND

- A. Para is incorrect, the appointment order of appellantis faked, illegal, out of merit, contrary to the rules and policy of the Government.
- B. Para is incorrect detail reply has given in Para No.2.

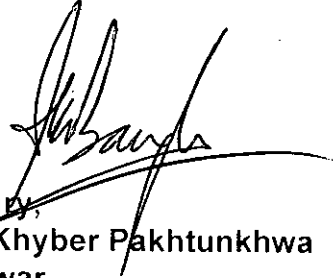
C. Para is incorrect, all the proceeding was adopted as per rules and report of the inquiry officer.

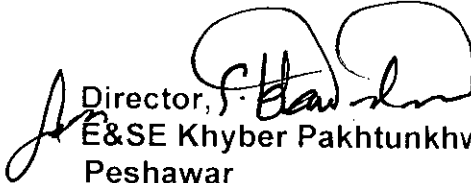
D. Para is incorrect, Respondents are bound to obey the rules, policy and law. Removal from service was issued after observing all codal formalities.

PRAYER.

It is therefore humbly prayed that on acceptance of above Para wise comments the appeal may graciously be dismissed with cost.

Respondents.....


Secretary,
E&SE Khyber Pakhtunkhwa
Peshawar


Director,
E&SE Khyber Pakhtunkhwa
Peshawar


Deputy Director (Establishment)
E&SE Khyber Pakhtunkhwa


District Education Officer,
(Female) Kohistan.

Annexure (A)

NOTIFICATION

Mr. Riyaz Khan (B-19) District Education Officer (Male) Kohistan is hereby appointed as enquiry officer to conduct an enquiry against Eight (8) PST Teachers appointed in District Kohistan and then transfer to District Swabi to verify as to whether they have been appointed legally or illegally. The letter of the District Education Officer (Female) Swabi vide No. 1031 dated 5-6-2013 is attached herewith.

The enquiry reports along with clear findings and recommendations should reach this office within 15 days positively.

Director
Education & Secondary Education
Chowk Bahawalpur, Peshawar

826-29

No 20 (F) Teacher Enquiry Division Dated 9/10/2014

Copy for file

Mr. Riyaz Khan (B-19) District Education Officer (Male) Kohistan
District Education Officer (Female) Kohistan with the remarks to assist and provide the relevant record to the Inquiry Officer concerned

- 3 District Education Officer (Female) Swabi w/r to her letter No.1031 dated 5-6-13
- 4 P.A. to Director E&SE Peshawar
- 5 M. File



[Signature]
9/10/14
Deputy Director (Female)
E&SE, Khyber Pakhtunkhwa, Pesh

9/10/14



10/10/14

Supdt
To Z
M

Keep the
recd
10/10

10/10



OFFICE OF THE DISTRICT EDUCATION OFFICER,
(MALE) KOHISTAN.

AB

No. 02-12345 Dated: 02-12-2014

ADDE
3/12/2014

To

Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject:

INQUIRY REPORT REGARDING PROMPT ACTION AGAINST THE TEACHERS APPOINTED IN
DISTRICT KOHISTAN

Memo: Reference your letter issued under Endst No 826-29 F.No.20/f teachers enquiry division dated 09/10/2014, the enquiry report on the subject matter is as under.

Background/ TOR

To probe into the matter on the subject cited above in R/O the following PST teachers who were appointed in District Kohistan and later on they were transferred to District Swabi

- 1. Mst Nuzhat PST ✓
- 2. Mst Nazia Qazi PST ✓
- 3. Mst Alia Ghafoor ✓
- 4. Mst Rujia PST ✓
- 5. Mst Sara PST ✓
- 6. Mst Khus Numa PST ✓
- 7. Mst Musserat Bibi PST ✓
- 8. Mst Anila Iqbal PST ✓

DD(F)
L/P

Procedure

- 1. Consultation with DEO (E) and SDEO (F) in Chair.
- 2. Collection of relevant record/ information from DEO (F) and SDEO (F) in Chair.
- 3. Examination of record/ information from District Accounts Officer Kohistan.

2008
4/12

- i. Mst Nuzhat Begum PST:
She was appointed as PST at GGPS Yazai Vide appointment order issued Endstt No.3189-94 dated 31-07-2009 and she took over the charge on the same day at GGPS Kass Banda instead of GGPS Yazai. After taking over charge she was again adjusted at GGPS Banjar Yanjool w.e.f 01-03-2011 vide EDO E&SE Kohistan No.741-49 dated 22-04-2011.
The source for the release of pay was verified from District Accounts Office Kohistan in the M/O 3/2011 along with the adjustment of arrear of pay for the M/O 3-4/2011, it mean that she could not get salary from date of appointment to 02/2011 (19 months).
- c. That indicates that she was appointed without the availability of post and she was adjusted at GGPS Banjar Yanjool.
- d. She was appointed only on pick and chooses method.
- e. She was appointed on single hand written application.
- ii. Mst Nazia Qazi PST:
a. Mst Nazia Qazi D/O Qazi Abdul Haq was appointed as PST GGPS Bar Korhila vides appointment order issued under Endst No.8836-12 dated 07/12/2006 and She took over t

Anne
(B) 2

iii. **Mst Aija Ghafoor PST:**

- a. Mst Aija Ghafoor D/O Ghafoor Gul R/O of District Swabi was appointed as pst at GGPS Kass Banda Vide appointment order issued Endstt No.3189-94 dated 31.07.2009 and took over the charge on the same day.
- b. She was again adjusted at GGPS Yanjool w.e.f 01-03-2011 vide EDO E&SE Kohistan No.741-49 dated 22-04-2011.
- c. The source I for the release of pay was verified from District Accounts Office Kohistan in the M/O 5/2011 along with the adjustment of arrear of pay for the M/O 3-4/2011.
- d. It mean that she could not get salary from date of appointment to 02/2011 (19 months) that indicate that she was appointed without the availability of post and on the availability of post she was adjusted in at GGPS Yanjool.
- e. She was appointed only on pick and chooses method.
- f. She was appointed on single hand written application.

iv. **Mst Ruqia PST:**

- a. Mst Ruqia Begum D/O Mustafa Gul R/O of District Swabi was appointed as pst at GGPS Kass Banda Vide appointment order issued Endstt No.3189-94 dated 31.07.2009 and took over the charge on the same day.
- b. After taking over charge she was again adjusted at GGPS Dassu w.e.f 01-03-2011 vide EDO E&SE Kohistan No.741-49 dated 22-04-2011.
- c. The source I for the release of pay was verified from District Accounts Office Kohistan in the M/O 5/2011 along with the adjustment of arrear of pay for the M/O 3-4/2011 it mean that she could not get salary from date of appointment to 02/2011 (19 months) that indicate that she was appointed without the availability of post she was adjusted at GGPS Dassu.
- d. She was appointed only on pick and chooses method.
- e. She was appointed on single hand written application.

v. **Mst Sara PST:**

- a. Mst Sara Begum D/O Fazal Yazdan R/O Mardan (Swabi) was appointed as PST GGPS Kundal vide DEO (F) Kohistan appointment order issued under Endst No.827-33 dated 2/2/1996 being SSC and RTC and as per entry in the service book she took over the charge on 3/2/1996.
- b. As per entry in the service book the pay of the said teacher was released vide DEO (F) Letter No.6071-73 dated 12/10/2010 in the period w.e.f. 01/12/2006 to 3/4/2012 (41 Months) as treated as EOL without pay and the period w.e.f date of appointment 30/11/2006 is not traceable for the month of October 2010.
- c. As per entry in the service book, the source I for the release of salary was verified from District Accounts Office for the month of 11/2010, the pay of the teacher for the period 1/5/2010 to 31/10/2010 has already been drawn.
- d. She was appointed on 2/2/1996 and got the salary w.e.f 1/5/2010, that indicates that she remained without salary from 2/2/1996 to 30/4/2010 (14 years & 3 Months)
- e. It is astonishing that how the appointment is valid.
- f. She was appointed only on pick and chooses method.
- g. She was appointed on single hand written application.

vi. **Mst Khush Numa PST:**

- a. Mst Khush Numa D/O Khurshid Ahmad R/O Swabi was appointed as PST at GGPS Dobair Villages vide appointment order issued under Endst No. 539-44 dated Kohistan

Annex (B)

- d. She was appointed being low academic qualification.
 - e. She was transferred from Kohistan on 8/1/2011 and she got the salary for only 2 month from Kohistan.
 - h. She was appointed only on pick and chooses method.
 - i. She was appointed on single hand written application.
 - vii. **Mst Mussarat Bibi PST:**
 - a. Mst Mussarat Bibi D/O Hazrat Wali was appointed as PST at GGPS Badar Shaha vide appointment order issued Enrst No.1135-40 dated 1/2/1996 w.e.f 1/5/1996.the order was issued in advance and as per entry in the service book she took over the charge on 1/5/1996.
 - b. She was appointed being only SSC with 342/850 marks less than 40% in 3rd division. She was appointed on simple hand written application without merit list and without other coddles formalities.
 - c. She was appointed with a very low academic qualification.
 - e. She was appointed on simple hand writing application
 - f. She was appointed by pick and chooses method
 - g. No other record is available for further verifications
 - viii. **Mst.Nadia Qazi**
 - a. Mst.Nadia Qazi D/O Qazi Fazal Haq was appointed as PST GGPS bar Komila vide appointment order issued under Enrd: No.8836-42 dated 07-12-2006
 - b. According to the merit list of Female candidates for the year 2006, she falls at S.No.28/06 being SSC.
 - c. She was appointed on simple hand writing application
 - d. She was appointed by pick and chooses method
 - e. No other record is available for further verifications.
- The score of all these candidates has been changed/ inserted in pen writing and has been changed and the appointments were made randomly and disorderly.

Findings

1. The appointments were made without the availability of vacant post and the submission of charge reports is merely the paper work that is why the source I for the release of salary was verified after the issuance and adjustment in 2nd orders.
2. The appointments were made with poor/ relaxed criteria with the intension to induct the candidates and leave out them from District Kohistan as soon as possible and the similar has been done.
3. The appointments were made to use District Kohistan as a launching bad/ back door for accommodating academically poor candidates.
4. The appointments were made on pick and choose policy.
5. The appointments were made in pierce-n-eal by violating the rules.

Photocopy of appointment orders, charge report, pages of service books and merit lists for the year 2006 and 2008 are attached here with as Annexure "A" & "B".

Recommendations.

After perusal of available record, facts and findings, the following recommendations are made.

1. The appointments are illegal and irregular and against the recruitment rules / policy, the appointing authority could not absolve himself from the responsibilities hence departmental proceeding/ legal action may be initiated against the appointing authority.
2. The appointments of above mention teachers are illegal and irregular hence liable to be withdrawn / cancelled / terminated.

Annexure

(4)

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Handwritten notes at the top: "DD" and "DD".

Date: 18/3/2015

The District Education Officer,
(Female) Kohistan

Subject: INQUIRY REPORT

I am directed to refer to the subject cited above and to enclose herewith a copy of the enquiry report and to ask you to decide the case in the light of the recommendation of the enquiry report carried out by Mr. Riasat Khan District Education Officer (Male) Kohistan under intimation to this office.

Encl. No.

Copy to the:

1. To Director (E&S) Khyber Pakhtunkhwa Local Director etc.

Deputy Director Female
E&S Kohistan

Handwritten signature and date: 18/3/15

Deputy Director Female
E&S Khyber Pakhtunkhwa

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359

Handwritten numbers: 2800, 2015

Anne

(D) (L)

OFFICE OF THE DIRECTOR OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA

NOTIFICATION

The transfer orders of the following teachers from District Kohistan to District Swabi issued via this office Endst.No. detail given below are hereby withdrawn due to their illegal and irregular appointments as per report of the inquiry officer vide letter No.02 dated 2-12-2014.

SN	Name of Teacher	From District Kohistan	To District Swabi	Endst.No.
1.	Alia Ghafoor PST	GGPS Banjar Yanjool	GGPS Battai No.2	Endst.No.2511-15 dated 19-10-2011
2.	Ruqia PST	GGPS Madā Khel	GGPS Haryan Banda	Et.No.2511-15 dated 19-10-2011
3.	Nuzhat PST	GGPS Banjar Yanjool	GGPS Haryan Banda	Endst.No.2527-31 datd 24-11-2010
4.	Khushnama PST	GGCMS Kohistan Jijal	GGPS Hayatabad	Endst.No.985-90 dated 08-01-2011
5.	Nazia Qazi PST	GGPS Bar Komila	GGPS Razi Bahadur Koti	Endst.No.4980-85 dated 20-09-2011
6.	Sara PST	GGPS Saglo	GGPS Aala Dher	E.No.1599-1605 dated 15-02-2011
7.	Mussarat PST	GGPS Samad Abad.Sao	GGPS Palosai	Endst.No.7490-95 dated 27-09-2008
8.	Aneeta PST	GGPS Koz	GGPS No.1 Dheri Gandaf	Endst.No.505-10 dated 08-10-2010

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa,

Endst: No. 2387-309 /F.No.20/(F) Enquiry dated Peshawar the 22/10/2015

Copy to the:-

1. District Account Officer Swabi & Kohistan
2. District Officer (Female) Swabi & Kohistan
3. Teacher Concerned.
4. P.A to Director Local Office

[Signature]
Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa,

19/10/15

Annexure
(E)

OFFICE OF THE DISTRICT EDUCATION OFFICER, (F) KOHISTAN.

PRF & Fax No. 9998407225

OFFICE ORDER

In compliance with the Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar letter, No.3081/F.No.20 (F) enquiry dated 16/03/2015, Reminder No. 2200/F.No.20/(F) enquiry dated 20/04/2015, No. 3530/ F.No.20 (F) enquiry dated 22/05/2015, and No.3696/F.No.20/(F) enquiry dated 24/08/2015 and In light of recommendation of enquiry officer, the following PST teachers are hereby removed from service with immediate effect.

S/NO	Name	School
1	Nuzhat PST	GGPS Kas banda
2	Nazia Qazi PST	GGPS Bar komila
3	Alia Ghafoor	GGPS Kas banda
4	Ruqia PST	GGPS Kas banda
5	Sara PST	GGPS Kundal
6	Khushnuma PST	GGPS Dubair
7	Mussarat Bibi PST	GGPS Badar shaha

District Education Officer
(Female) Kohistan

No. / Estab. / DEO (F) KH Kohistan

- Copy of the above is forwarded to:
The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
- The District Education Officer (F) District Swabi, for necessary action at her end as the above teachers are now posted in District Swabi.
- The District Accounts Officer, Swabi.
- The District Accounts Officer, Kohistan.
- The District Special Education Officer (F) Kohistan.

District Education Officer
(Female) Kohistan

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1896 /ST

Dated 29 / 10 / 2019

To


The District Education Officer Female,
Government of Khyber Pakhtunkhwa,
Kohistan.

Subject: -

JUDGMENT IN APPEAL NO. 453/2016, MST. KHUSHNAMA.

I am directed to forward herewith a certified copy of Judgement dated 09.10.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.