


FORM OF ORDER SHEET

Court of _____

Appeal No. 509/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/04/2024	<p>The appeal of Mst. Raheela Nazir resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 08 .04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

... Nazir received today i.e on 14 .03.2024 is incomplete on ... which is returned to the counsel for the appellant for completion and ... 15 days.

... of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules ... 2 are unnecessary/improper parties, in light of the ... written direction of the Worthy Chairman the above ... number be deleted/struck out from the list of ...

... is not attached with the appeal.

③ ... be flagged/marked with annexures marks.

... are unattested.

... is unsigned.

... by the Oath Commissioner.

... which appeal is filed is not mentioned.

... of respondent no.4 is incomplete be completed according to rule-6 of the ... Service Tribunal rules 1974.

... service certificate and NOC mentioned in the memo of ... with the appeal.

... illegible be replaced by legible/better one.

... along with annexures i.e. complete in all respect ... for each respondent be submitted with the appeal.

415
20/3

REGISTRAR

19/3/24

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

R/Sir
All the ...
have been removed. Re-submitted
today. Addn of R. 4 is complete
JPR

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 509 /2024

Raheela Nazir W/O Mian Zia Ul Islam Ex- CT Teacher (BPS-15)
Government Girls Middle School Gul Shah, presently the Resident of
Hayatabad Peshawar..... (**Appellant**)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Civil
Secretariat Peshawar and others..... (**Respondents**)

INDEX

S#	Description of the Documents	Annex	Pages
1.	Memo of appeal		1-6
2.	Copy of the appointment notification dated 04.01.2019	A	7
3.	Copy of the Nikahnama	A/1	8-10
4.	Copy of the Service Certificate	B	4
5.	Copy of the application for inter district transfer	C	12-14
6.	Copy of the NOC	D	15
7.	Copy of the Removal Order dated 02.10.2023	E	16
8.	Copy of the Notification dated 18.01.2024	F	17
9.	Copy of the writ petition No. 3978/23	G	18
10.	WAKALATNAMA		19

Applicant/ Appellant *Raheela*

Through

YASIR SALEEM
Advocate Supreme Court
Office FR: 4 Fourth Floor
Bilour Plaza Peshawar Cantt.
Cell: 0331-8892589
Email: yasirsaleemadvocate@gmail.com.

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 509 /2024

Raheela Nazir W/O Mian Zia Ul Islam Ex- CT Teacher (BPS-15)
Government Girls Middle School Gul Shah, presently the Resident of
Hayatabad Peshawar.

VERSUS

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa
Peshawar.
2. District Education Officer (F) Swat.

SERVICE APPEAL U/S 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT AGAINST THE ORDER
DATED: 02-10-2023 VIDE WHICH THE APPELLANT
HAS BEEN AWARDED THE MAJOR PENALTY OF
REMOVAL FROM SERVICE WITH RETROSPECTIVE
EFFECT AGAINST WHICH HIS DEPARTMENTAL
APPEAL DATED 24.10.2023 WAS ALSO REGRETTE
VIDE NOTIFICATION DATED 18.01.2024
COMMUNICATED TO THE APPELLANT ON 16.02.2024.

PRAYER:

ON ACCEPTANCE OF INSTANT SERVICE APPEAL
BOTH THE ORDERS DATED 02.10.2023 AND 18.01.2024
MAY KINDLY BE SET-ASIDE AND THE APPELLANT

BEFORE THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11757

Dated 14-03-2024

Service Appeal No. _____ /2024

Raheela Nazir W/O Mian Zia Ul Islam Ex- CT Teacher (BPS-15)
Government Girls Middle School Gul Shah, presently the Resident of
Hayatabad Peshawar.

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer (F) Swat.

u/s 4 of K.P. Service Tribunal Act
SERVICE APPEAL AGAINST THE ORDER DATED: 02-10-2023 VIDE WHICH THE APPELLANT HAS BEEN AWARDED THE MAJOR PENALTY OF REMOVAL FROM SERVICE WITH RETROSPECTIVE EFFECT AGAINST WHICH HIS DEPARTMENTAL APPEAL DATED 24.10.2023 WAS ALSO REGRETTEED VIDE NOTIFICATION DATED 18.01.2024 COMMUNICATED TO THE APPELLANT ON 16.02.2024.

Filed to-day

Registrar

PRAYER:

ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH THE ORDERS DATED 02.10.2023 AND 18.01.2024 MAY KINDLY BE SET-ASIDE AND THE APPELLANT

**MAY KINDLY BE RE-INSTATED IN SERVICE WITH
ALL BACK AND CONSEQUENTIAL BENEFITS.**

Respected Sir,

The appellant humbly submit as under;

1. That the Appellant was appointed as CT BPS-15 and was posted at Government Girls Middle School Gul Shah vide Notification dated 04.01.2019. The Appellant took charge of her post on 01.03.2019. *(Copy of the appointment notification dated 04.01.2019 is attached as Annexure A)*
2. That ever since her appointment the Appellant performed her duties with zeal and devotion and up to the entire satisfaction of her superiors which is evident from the fact that there has been no complaint against her in her entire service career with to duties.
3. That during the course of employment the Appellant got married to one Zia Ul Islam on 13.08.2022. After the marriage the Appellant started her matrimonial life with her husband who is posted at Peshawar. *(Copy of the nikahnama is attached as Annexure A/1)*
4. That husband of the Appellant namely Mian Zia Ul Islam is serving in SNGPL and has been posted at SNGPL office Hayatabad Peshawar. *(Copy of the service certificate is attached as Annexure B)*
5. That since, after the marriage and Rukhsati the Appellant has settled with her husband at Hayatabad Peshawar, it had become impossible for the Appellant to continue her duties at GGMS Gulshah, she filed an application for Inter-District transfer vide endorsement No. 1979 dated 16.03.2023 from Swat to district Peshawar under the spouse policy of the Provincial Govt. *(Copy of the application for inter district transfer is attached as Annexure C)*

6. That it is pertinent to mention here that the DEO (F) had herself given NOC to the application form of the Appellant. The said application form was duly submitted in the office of DEO (F) Peshawar. *(Copy of the NOC is attached as Annexure D)*
7. That even after the submission of application, the Appellant performed her duties at the said school for some days however in the meantime she had suffered from severe back pain so she could not continue her duties at the said school she consulted a doctor who advised complete bed rest to the Appellant therefore the Appellant filed an application to the respondent No. 4 for grant of medical leave.
8. That ever since her applications, the Appellant contacted the respondents about the fate and outcome of her applications, however no response either positive or negative has been given.
9. That it is pertinent to mention here that the factum of her marriage was in the knowledge of the head mistress of her school and the DEO (F) Swat.
10. That the Appellant was at the residence of her husband and she was not informed regarding the outcome of any of her applications, rather she was proceeded departmentally and notices though might have been issued but were never communicated to the appellant.
11. That without fulfilling the required procedure which is mandatory under the Khyber Pakhtunkhwa Civil Servants (E&D) Rules 2011 the appellant has been awarded major penalty of removal from service vide office order dated: 02-10-2023. *(Copy of the removal order dated 02.10.2023 is attached as Annexure E)*
12. That feeling aggrieved from the impugned order dated: 02-10-2023, the appellant filed departmental appeal dated 24.10.2023, however the same was also regretted vide Notification dated 18.01.2024. it is

pertinent to mention here that the said notification has been communicated to appellant on 16.02.2024. *(Copy of the notification dated 18.01.2024 is attached as Annexure F)*

13. That both the original as well as appellate order are illegal, unlawful and liable to be set aside inter-alia on the following grounds:-

GROUND:

- A. That the appellant has not been treated in accordance with law on the subject hence her right secured and guaranteed under the Constitution of Pakistan 1973 are badly violated.
- B. That the appellant never committed any act or omission which could be termed as misconduct rather after her marriage she had to settle with her husband at Peshawar and the factum of her marriage was in the knowledge of the department.
- C. That ever since her marriage the appellant constantly requested the department in shape of several representations to transfer her to Peshawar under the spouse policy of the Provincial Government.
- D. That even after her marriage upon the directions of department she joined her duties at Swat however due to severe back pain she could not continue her duties and she applied for leave on medical grounds.
- E. That no proper procedure was adopted by the department prior to be in position of major penalty, neither she has been heard nor any of alleged notices, that might have been issued, were ever communicated to the appellant. So the appellant is condemned unheard which is illegal, unlawful and ineffective upon the rights of the appellant.
- F. That it is pertinent to mention here that the impugned order is passed during the pendency of the writ petition which has been filed by the appellant for her transfer under the spouse policy and also for the

sanction of leave (either medical or an alternate without pay). *(Copy of the writ petition No. 3978/23 is attached as Annexure G)*

- G. That no proper inquiry was conducted in the matter to dig out the real truth and the impugned order was passed just to torture the appellant.
- H. That under the revised leave rules 1981 a civil servant can avail leave without pay upto two years, however despite the fact that the petitioner was having very genuine reason, she was awarded the major penalty of removal from service.
14. That the appellant seeks leave of this honorable tribunal to take additional grounds at the time of arguments.

It is therefore most humbly prayed that on acceptance of instant service appeal both the orders dated 02.10.2023 and 18.01.2024 may kindly be set-aside and the appellant may kindly be re-instated in service with all back and consequential benefits.

Rahila

Applicant/ Appellant

Through

Y
YASIR SALEEM
Advocate/Supreme Court
of Pakistan

AFFIDAVIT

It is solemnly affirm and declare on oath that the contents of the petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Qul
Copy

Rahila

DEPONENT

8

Annex "A"

OFFICE OF THE DISTRICT EDUCATION OFFICER (Female) SWAT

Ph: (0906) 9240210

Ph: (0906) 9240219

Email: de@swat@gmail.com

www.female.edd.edu.pk

APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby offered purely on merit against the vacant posts of 01 on below stated basis policy in OPS-15 (RS: 15120-1330-56020). Fixed plus grant allowances as per rules to be there under the Rules and existing policy of the Provincial Government on the terms & conditions given below will effect from the date of their taking over charge in the interest of public service.

Sr	Name / Parentage	D/O Birth	Domicile	Score	Name of School	
1	URM NAZ	ARZOMAN KHAN	04/01/92	Swat	142.97	GGHS Pindir
2	HUSRA KHAN	SHERALI RAHMAT	18/17/92	Swat	141.17	GGHS Pindir
3	ABISHA	FAZAL RAHIM	05/03/91	Swat	140.55	GGHS Pindir
4	SAMAN JAR	KHURSHID	10/12/89	Swat	139.83	GGHS Pindir
5	KIRAN AHMAD	HASHID AHMAD JANI	10/02/93	Swat	139.02	GGHS Pindir
6	FRUJ NAZ	KARIM KHAN	02/12/91	Swat	138.42	GGHS Pindir
7	YASNA KHAN	MOHAMMAD GHAFFAR KHAN	11/01/91	Swat	137.02	GGHS Pindir
8	HEELI SALAM	ABDUL SAMAD	22/12/92	Swat	136.57	GGHS Pindir
9	KALSOOM	FAZAL AKBAR	06/07/91	Swat	136.56	GGHS Pindir
10	SOBIHA BEGUM	HAROON UL RASHID	05/01/88	Swat	136.17	GGHS Pindir
11	SHAFAT	SHERALI	10/04/87	Swat	136.13	GGHS Pindir
12	SHADAB IBRAHIM	MUHAMMAD IBRAHIM	28/03/95	Swat	136.09	GGHS Pindir
13	SAIRA SAND	CHAMAN SHAIK	25/03/89	Swat	135.53	GGHS Pindir
14	SAIRA IQBAL	MUHAMMAD IQBAL	01/03/91	Swat	135.36	GGHS Pindir
15	LAILA SAAD	SAADULLAH KHAN	15/09/92	Swat	134.92	GGHS Pindir
16	AZMAT	SHER AHMAD	01/01/93	Swat	134.58	GGHS Pindir
17	ZUBAIDA GUL	HAFIZUMA GUL	02/12/92	Swat	134.52	GGHS Pindir
18	NIDORA AMIR	KMIR RAHMAT	01/02/91	Swat	134.34	GGHS Pindir
19	SUMREEN SHAH	MISAL SHAH	02/02/89	Swat	134.11	GGHS Pindir
20	SALMA BEGUM	SULIMAN	22/06/89	Swat	133.77	GGHS Pindir
21	HINA	SHER BACHA	15/09/91	Swat	133.51	GGHS Pindir
22	ZULAIKHA BIBI	SHOUDAN KHAN	08/01/89	Swat	131.99	GGHS Pindir
23	TAKIRA	NAMEEL	05/08/90	Swat	131.57	GGHS Pindir
24	MUSNA BIBI	KHISTA BACHA	09/12/93	Swat	131.10	GGHS Pindir

Attested to be true Copy

59	SEHRISH QADRI	GHASIA KHANUM	22/03/94	Swat	126.29	GGHS Peshawar
60	SADAF	FAZAL MAHMOOD	05/10/91	Swat	126.73	GGHS Koha Baidar
61	HOUSSAIN USMANI	USMANI GHAFIL	22/11/93	Swat	126.11	GGHS Peshawar
62	KALSOOM	SIBAL	10/01/92	Swat	126.01	GGHS Jambhal
63	GULFAM	HAFSAT SYED	22/01/97	Swat	125.98	GGHS Peshawar
64	IBRAM HAZ	JASID ALI JAGOT	01/00/93	Swat	125.46	GGHS Koha Baidar
65	HABIA QURASHI	MUHAMMAD QURASHI	05/11/83	Swat	125.78	GGHS Chingora
66	SADIA ISMAIL	MUHAMMAD ISMAIL	01/05/94	Swat	125.57	GGHS Peshawar
67	BAKHT HAZ	JCHAN ZED	14/09/97	Swat	125.52	GGHS Peshawar
68	MARYAM BEGUM	MUHAMMAD SAEED	19/01/89	Swat	125.41	GGHS Koha Baidar
69	SCORA KHANUM	HASSAN JAVID	27/03/95	Swat	125.40	GGHS Koha Baidar
70	ASIA SHAH	SHAH ROOM KHAN	15/03/91	Swat	125.33	GGHS Koha Baidar
71	KALSOOM	SHER BAHADUR KHAN	01/03/94	Swat	125.30	GGHS Chingora
72	NEELAM BACHA	BACHA SAIB	20/03/92	Swat	125.16	GGHS Peshawar
73	JAWARISH BIBI	WAZIR HASSAN MIAN	01/03/94	Swat	125.15	GGHS Koha Baidar
74	SUNBAL MAHMOOD	KHALID MAHMOOD	25/04/93	Swat	125.14	GGHS Koha Baidar
75	HAFSA	JAMEEL	16/11/93	Swat	125.07	GGHS Jambhal
76	SHAZIA	SYED FAQEER	27/03/89	Swat	124.90	GGHS Koha Baidar
77	SADAF JAHAN	IQBAL HUSSAIN	20/10/90	Swat	124.83	GGHS Koha Baidar
78	NUZHAT HADIBI	HABIB ULLAH	12/01/93	Swat	124.75	GGHS Koha Baidar
79	RAHILA NAZIR	HAZIR AHMAD	01/03/90	Swat	124.74	GGHS Koha Baidar
80	SEEMA GUL	OBIDULLAH	02/01/91	Swat	124.74	GGHS Koha Baidar
81	TASMA BIBI	INAYAT KHAN	02/01/93	Swat	124.65	GGHS Koha Baidar
82	INBISAT	BAKHT MAHMOOD	24/08/89	Swat	124.36	GGHS Koha Baidar
83	HUMA SHAH	SHAHARYAR	05/03/94	Swat	124.33	GGHS Koha Baidar
84	HAYAM	MUHAMMAD FAHIM KHAN	05/06/92	Swat	124.31	GGHS Koha Baidar
85	ZIA-US-SAMA	FAZAL SUBHAN	03/09/89	Swat	124.31	GGHS Koha Baidar
86	GULSHOW	INAYATUR REHMAN	02/02/97	Swat	124.27	GGHS Koha Baidar
87	LUBNA RIAZ	RIAZ AHMAD	17/12/92	Swat	124.08	GGHS Koha Baidar
88	SAIMA JAMAL	SYED JAMALI SHAH	25/05/90	Swat	124.04	GGHS Koha Baidar
89	SAIRA	ABDUL MAJID	16/03/92	Swat	123.83	GGHS Koha Baidar
90	LUBNA	ABDUL SATTAR KHAN	03/04/94	Swat	123.82	GGHS Koha Baidar
91	ALEEMA	MUHAMMAD SAEED	01/10/92	Swat	123.76	GGHS Koha Baidar
92	SUMAIRA ALI	GHAZAFAR ALI	03/01/92	Swat	123.58	GGHS Koha Baidar

Gul
 Attested to be true
 Copy

- 14. Their appointment is Ad hoc and school based. They shall have to serve at their designated posting and their services are not transferable to any other station.
- 15. Before handing over charge to them, their documents may be checked and if found bogus or fake they may be reported to this office for necessary action.
- 16. Posting within the selected five schools is the wholly solely authority of the appointing authority and no one has the right to claim for a specific school.
- 17. All the Principals / Headmistress are required to collect an affidavit from each candidate that she will follow all the terms and condition listed above and will keep it on record.
- 18. Errors and omissions will be acceptable within the specified period.


(Shamim Akhtar)
 District Education Officer
 Female Swat

Dated: 04 / 01 / 2019

Endst: No. 48 - 53 / Appointment / NTS-CT / Female Swat

Copy forwarded for information and necessary action to the:-

- 1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. District Comptroller of Accounts Swat
- 3. Principal / Headmistress GGHS / GGHS / GGMS District Swat
- 4. B&AO Local Office
- 5. Official Concerned
- 6. Master File


 District Education Officer
 Female Swat

Attested to be true
 Copy

(11)

9

BETTER COPY PAGE#

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

Tel: (0946) 9240214
Email: deofswat@gmail.com

Fax: (0946) 9240214
www.female.sed.edu.pk

APPOINTMENT

Consequent upon the recommendations of the Departmental Selection Committee appointment of the following candidates is hereby ordered purely on merit against the vacant posts of CT on Adhoc School basic policy in BPS: 15 (Rs: 16120-1330-56020) Fixed plus usual allowances as admissible to them under the Rules and existing policy of the Provincial Government on the terms & conditions given below with effect from the date of their taking over charge on the interest of public service.

S#	Name/Parentage	D/O/B	Domicile	Score	Name of School
1.	Iurn Naz Arzomand Khan	05/01/92	Swat	142.97	GGHS Fazal Abad Kanju
2.	Husna Kiran Sher Ali Rahman	18/12/92	Swat	141.17	GGMS Manja
3.	Farishita Fazal Rahim	05/03/91	Swat	140.58	GGMS Haji Baba
4.	Sanam Jan Khurshid	10/12/89	Swat	139.69	GGMS Tannma
5.	Kiran Ahmad Rashid Ahmad Jan	10/02/93	Swat	139.22	GGMS Rahim Abad
6.	Erum Naz Karim Khan	02/12/91	Swat	139.12	GGHSS Charbagh
7.	Yamna Khan Mohammad Ghaffar Khan	11/04/94	Swat	137.02	GGMS Dakorat
8.	Neelam Salam Abdul Salam	22/12/92	Swat	136.52	GGMS Dardyal
9.	Kalsoom Fazal Akbar	04/07/91	Swat	136.50	GGMS Kom Bhodial
10.	Robina Begum Haroon ur Rashid	05/03/84	Swat	136.47	GGMS Shan Degran
11.	Shafaat Sher Ali	10/04/87	Swat	136.33	GGHS Malook Abad
12.	Shadab Ibrahim Muhammad Ibrahim	28/03/95	Swat	136.09	GGMS Qarmabar
13.	Saira Bano Chaman Shah	25/03/89	Swat	135.59	GGMS Manyar
14.	Saira Iqbal Muhammad Iqbal	01/03/92	Swat	135.38	GGMS Gul Bandai
15.	Laila Saad Saadullah Khan	15/09/92	Swat	134.92	GGHSS Estohper
16.	Azmat Sher Ahmad	01/01/91	Swat	134.58	GGMS Tegral
17.	Zubaida Gul Haji Juma Gul	02/12/92	Swat	134.52	GGHS Zarakheta
18.	Noora Amir Amir Rahman	01/02/94	Swat	134.34	GGHS Shahdara
19.	Sunireen Shah Misal Shah	02/02/89	Swat	134.11	GGMS Uttar
20.	Salma Begum Suliman	22/06/89	Swat	133.77	GGHS Gogtara
21.	Hina Sher Bacha	15/09/91	Swat	133.51	GGHSS Totara Bandar
22.	Zulaikha Bibi Shouban Khan	08/01/89	Swat	131.93	GGHSS Udgram
23.	Tahira Jameel	05/08/89	Swat	131.58	GGMS Bara Banam
24.	Husna Bibi Khista Bacha	06/12/93	Swat	131.19	GGMS Dardyal

Attested to be true
Copy

(12)

10

BETTER COPY PAGE#

58.	Sehrish Khan	Khaista Muhammad	02/04/94	Swat	126.29	GGHS Kanju
59.	Shabana	Fazal Mabood	05/04/91	Swat	126.23	GGMS Dadahara
60.	Nourin Usman	Usman Ghani	22/11/92	Swat	126.11	GGHS Jambil
61.	Kalsoom	Siraj	20/01/92	Swat	126.01	GGMS Kalizan
62.	Gulfam	Hazrat Syed	22/01/92	Swat	125.98	GGMS Khawaja Abad
63.	Iram Naz	Javid Ali Shah	01/06/83	Swat	125.86	GGHSS Kafshalay
64.	Rabia Quraishi	Muhammad Quraish	05/11/89	Swat	125.78	GGHS Nizoghlan
65.	Saadia Ismail	Muhammad Ismail	01/05/94	Swat	125.57	GGMS Dardyal
66.	Bakht Naz	Jehan Zeb	14/09/87	Swat	125.52	GGMS Kom Bhodial
67.	Maryam Begum	Muhammad Saeed	19/01/89	Swat	125.41	GGMS Shan Degran
68.	Sedra Khanum	Hassan Javid	27/03/95	Swat	125.40	GGHS Malook Abad
69.	Asia Shah	Shah Room Khan	15/03/91	Swat	125.33	GGMS Qarmabar
70.	Kaisoom	Sher Bahadar Khan	01/03/91	Swat	125.30	GGMS Manyar
71.	Neelam Bacha	Baclia Said	20/03/92	Swat	125.16	GGMS Gul Bandai
72.	Jawarish Bibi	Wazir Hassan Mian	01/03/94	Swat	125.15	GGHSS Estohper
73.	Sunbal Mehmood	Khalid Mahmood	25/04/93	Swat	125.14	GGMS Tegral
74.	Hafsa	Jameel	16/11/93	Swat	125.07	GGHS Zarakheta
75.	Shazia	Syed Faqeer	21/03/89	Swat	124.90	GGHS Koza Durashkhel
76.	Sadaf Jahan	Iqbal Hussian	29/10/90	Swat	124.83	GGMS Haji Baba
77.	Nuzhat Habibi	Habib Ullah	12/01/93	Swat	124.75	GGHS Sarsanoi
78.	Rahila Nazir	Nazir Ahmad	01/03/90	Swat	124.74	GGMS Gal Shah
79.	Seema Gul	Obidullah	02/01/91	Swat	124.74	GGHS Aboha
80.	Asma Bibi	Inayat Khan	02/01/93	Swat	124.65	GGHS Aboha
81.	Inbisat	Bakht Mahmood	24/08/89	Swat	124.36	GGHS Ahingaro Dehr
82.	Huma Shah	Shahryar	05/03/94	Swat	124.33	GGHS Zarakhela
83.	Hayam	Muhammad Fahim Khan	05/06/92	Swat	124.31	GGHSS Kalakalay
84.	Zin us Sama	Fazal Subhan	03/09/89	Swat	124.31	GGHS Zarakhela
85.	Gulshow	Inayat ur Rehman	02/02/97	Swat	124.27	GGMS Bara Bandai
86.	Lubna Riaz	Riaz Ahmad	12/12/92	Swat	124.08	GGHS Koza Bandai
87.	Saima Jamal	Syed Jamali Shah	25/05/90	Swat	124.04	GGHS Ninigolai
88.	Saira	Abdul Manan	16/03/92	Swat	123.83	GGMS Manyar
89.	Lubna	Abdul Sattar Khan	03/04/94	Swat	123.82	GGHS Bara Durash
90.	Aleema	Muhammad Saeed	01/10/92	Swat	123.76	GGHS Deolai
91.	Sumaira Ali	Ghazanfar Ali	05/01/92	Swat	123.58	GGHSS Totano Bar

Attested to be true
Copy

(13)

BETTER COPY PAGE#

14. Their appointment is Adhoc and school based. They shall have to serve at their place of posting and their services are not transferable to any other station.
15. Before handing over charge to them, their documents may be checked and if found bogus or fake they may be reported to this office for necessary action.
16. Posting within the selected five schools is the wholly solely authority of the appointing authority and no one has the right to claim for a specific school.
17. All the Principals / Headmistress are required to collect an affidavit from each candidate that she will follow all the terms and condition listed above and will keep it on record.
18. Errors and omissions will be acceptable within the specified period.

(Shamim Akhtar)
District Education Officer
Female Swat

Endst: No. 48-53/ Appointment/NTS-CT/Female Swat

Dated: 04/01/2019

Copy forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Swat.
3. Principal/Headmistress GGHS/GGHS/GGMS District Swat.
4. B&AO Local Office.
5. Official Concerned.
6. Master File.

-sd-

District Education Officer
Female Swat

Attested to be true
Copy

صلح سوات

خطبة النكاح

صیر یختونشوا

اما بعد

عقد نكاح

راحمہ نزییر دہلیت نزییر احمد

نیوگرام بکریں سوات - 1 شادی کا روز 1-3-1999ء - 1-3-1999ء

ضیاء الاسلام دہلیت میاں کریم بخش

داماد سرین سیرات - 1 شادی کا روز 1-3-1980ء - 1-3-1980ء

کوٹہ سرنا شکل زیور است

نور احمد 1 شادی کا روز 1-3-1980ء - 1-3-1980ء

نیوگرام بکریں صلح سوات

1 شادی کا روز 1-3-1980ء - 1-3-1980ء

نور احمد 2 شادی کا روز 1-3-1980ء - 1-3-1980ء

نیوگرام بکریں سوات

1 شادی کا روز 1-3-1980ء - 1-3-1980ء

دقیب النکاح احمد حسین دہلیت حبیب خان

نیوگرام بکریں سوات - 1 شادی کا روز 1-3-1980ء - 1-3-1980ء

صباحِ جمعہ کا مضمون: طالبہ بی بی انیس خانم

میں صفا سن پوری عقل و ہوش کے ساتھ تیری ضمانت دیتا ہوں کہ نکاح نامہ بنا میں جملہ کوائف و بیانات بالکل درست اور صحیح ہیں غلط ثابت ہونے پر حکومت پاکستان کو مبلغ ایک لاکھ روپیے جرمانہ ادا کرونگا

نام صفا سن، مصباح اللہ، بلدیہ، صلیب لریج کچن

پتہ: دھان صلیب، تحصیل تھانہ، ضلع

1 5 6 0 8 1 - 7 5 8 9 1 9 0 - 5

شخصی کارڈ نمبر

2 کتاب نمبر 11

تاریخ نکاح 13-8-2022

تاریخ رجسٹریشن 13-8-2022

نام نکاح رجسٹرار اعلیٰ سن یونین کونسل سواتل کھڑیان

1 5 6 0 8 1 - 8 8 9 8 0 8 1 - 3

شخصی کارڈ نمبر

مختار احمد صاحب
 تحصیل سوات
 ضلع سوات
 سوات
 3

دستخط دمہر نکاح رجسٹرار

(4)

Annex "A/1" 12



SWAT EDUCATION DEPARTMENT
Department of Elementary & Secondary Education, Swat
Govt. of Khyber Pakhtunkhwa

Tel: 0946-0240209 / 0240228
Fax: 0946-0240211
Online Portal: www.swateducation.com
Email: swateducation@gmail.com

CHARGE REPORT

(For New Appointment Only)

Certified that Miss/Mr. RAHWA NAZIR Father Name of NAZIR AHMAN
Resident of BAHRAIN is hereby appointed against the post of CT on School based in
BPS 15 (School Name) GAL SHAH under
the District Education Officer Engiti No. 48-53 Dated 01-03-19
Signature of Official [Signature]

FOR HEAD OF THE SCHOOL ONLY

File No. _____
Certified that we have on the (fore/afternoon) FORE of this day (date) 01 March 2019
respectively and gave a charge of post CT BPS 15 in above mentioned school to this charge report holder
and received her require documents file (on school record)
Signature of Head of the School [Signature]
Govt. Girls Middle School
Gal Shah Distt. Swat
Seal & Signature 01-03-2019
Head of the School

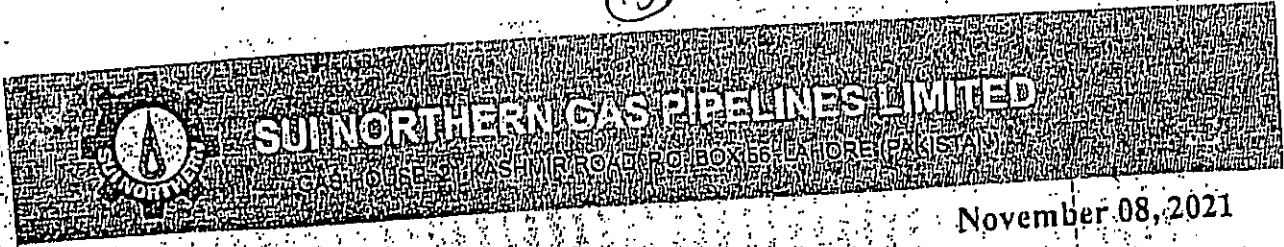
- Tick to whom copy of the above is forwarded to:
1. Heads of the concern schools
 2. ASDEO Circle Office
 3. The Sub-Divisional Education Officer (SDEO) Swat
 4. Deputy District Education Officer (Dy. DEO) Swat
 5. District Education Officer (DEO) Office Swat
 6. District Account Officer Swat
 5. Concern for his/her Record

Published by Swat Education Department
GSEPP: NWEP/152/15/2000/1/9/10039/505/11/NWEP/AC/ST/1/No:421
Govt. of Khyber Pakhtunkhwa
Published by Swat Education Department
Govt. of Khyber Pakhtunkhwa
Tel: 0946-0240209 / 0240228
Fax: 0946-0240211
Online Portal: www.swateducation.com
Email: swateducation@gmail.com

Attested to be true
Copy

15

Annex (B)



November 08, 2021

MD:ZUI(517691)

TO WHOM IT MAY CONCERN

This is to certify that Mr. Zia Ul Islam, Deputy Chief Officer (Law), Peshawar (D) is a permanent executive of Sui Northern Gas Pipelines Limited since 21.03.2012.

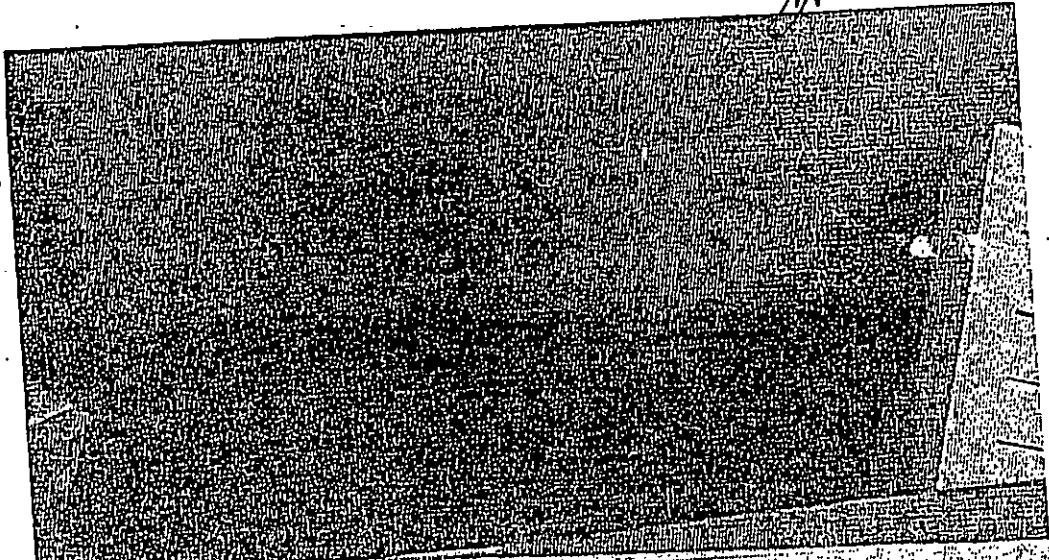
This certificate is being issued to him on his own request to apply for Car Loan from Bank.

(Signature)
 (ALI KAMRAN)
 DEPUTY CHIEF OFFICER (HR)
 for MANAGING DIRECTOR

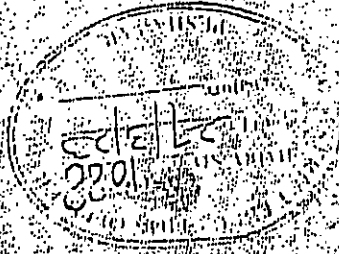
A. Assted
(Signature)

(Signature)
 Attested to be true
 Copy

Attested to be true



Handwritten signature or initials in the left margin.



Notarizing documents (only if the documents are provided by the applicant) should be provided by the applicant. The following documents should be provided by the applicant:

1. Certificate of Birth (if applicable)
2. Certificate of Marriage (if applicable)
3. Certificate of Divorce (if applicable)
4. Certificate of Death (if applicable)
5. Certificate of Citizenship (if applicable)
6. Certificate of Naturalization (if applicable)
7. Certificate of Residency (if applicable)
8. Certificate of Employment (if applicable)
9. Certificate of Education (if applicable)
10. Certificate of Financial Statement (if applicable)

I, _____, do hereby certify that the above information is true and correct to the best of my knowledge and belief.

Signature of the notary public.

Signature of the applicant.

Signature of the witness.

Signature of the witness.

Signature of the witness.

APPLICATION FORM FOR INTER-DISTRICT TRANSFER

②

ANNEX

①

17

BETTER COPY PAGE#
APPLICATION FORM FOR INTER DISTRICT TRANSFER

- | | |
|--|--|
| 1. Name of Teacher/Applicant: | Rahila Nazir |
| 2. District of Domicile: | Swat |
| 3. Designation/Post held with BPS: | CT |
| 4. Date of 1 st Appointment: | 01-03-2019 |
| 5. Date of taking over charge: | 01-03-2019 |
| 6. Name of present school of posting: | GGMS Galshah Swat |
| 7. Name of school where posting is required: | GGHS, Phase 1, Hayatabad
GGMS, Malkanda |
| 8. _____ for transfer: | |
| 9. GP Fund No: | _____ |
| 10. Personal No: | 00914384 |
| 11. Signature of Principal/Headmistress/Head Teacher | _____ |
| 12. Signature of DEO in case of Primary Teacher | _____ |

I solemnly declare that all above information from S. No 01 to 11 are correct and nothing has been concealed.

Signature: _____ -sd-
Name of Applicant: Rahila Nazir
CNIC: 15602-2302081-4

CERTIFICATE BY RECEIVING DISTRICT EDUCATION OFFICER

Certified that I have no objection to the transfer of Mr./Mst. Rahila Nazir from GGHS Galshah to Peshawar.

The following arrangement will be made by me for filling up the post of CT-BPS 15 in case of transfer of Mr./Mst. Rahila Nazir.

It is certified that:

The Study/ education of the school will not suffer with proposed transfer.

The applicant is regular employee and not contract (Mention) period _____

Signature _____ -sd-
Name of DEO _____

Endst: 1979/dated: 16/3/2023

POST AVAILABILITY CERTIFICATE OF THE DISTRICT EDUCATION OFFICER WHERE POST IS PROPOSED

Certified that I have no objection to the transfer of Mr./Mst. _____ of against vacant of _____ at (Name of School) _____ of District _____. I have also examined his/her relevant documents and found correct, it is also certified that no NOC has been issued to any other person against the post.

Name of EDO _____
Endst No _____ dated _____

Signature _____
Stamp _____

Note:- the following documents (duly attested) should be provided).

- | | |
|------------------------|---|
| 1) Service Photo State | 2) 1 st Appointment Order (Original or attested photo copy by DEO) |
| 3) Domicile | 4) Previous Transfer Order (if any) |
| 5) Last Pay Roll | 7) Last Balance Sheet of GP Fund |
| | 8) SSC, Intermediate, PTC, CT, B.Ed etc |

Attested to be true Copy

Endstt. No 8421-29.

Dir. 02-10/023

Copy forwarded for information and necessary action to the;

1. Director Elementary & Secondary Education KP Peshawar.
2. Deputy Commissioner Swat.
- ✓ 3. District Comptroller of Accounts Swat at saidu Sharif.
4. District Monitoring Officer Swat.
5. Budget & Account Officer Local Office for doing the needful.
6. Headmistress GGMS Galshah (Now GGHS Galshah) Matta swat for doing the needful under intimation to this office.
7. Dealing Assistant for Office record.
8. DEMIS Local Office for further entries in record.
9. Mst. Raheela Nazir D/O Nazir Ahmad R/O Village Panjegram, Bahrain District Swat (Registered)

(DR. SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER(F)
SWAT

4
Attested to be true
Copy

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

NOTIFICATION

WHEREAS, Mst. Rahela Nazir D/O Nazir resident of Bahram Swat bearing CNIC NO 15602 2102081-4, was appointed as C.T. BPS-15 at GGMS Gul Shah District Swat through NTS vide DEO (Female) Swat Endst; NO 15-41 Dated 4-1-2019

WHEREAS, the above named appellant availed P.O.L. 5-9-2021 to 15-11-22 vide DEO (F) Office Endst; NO: 9811-15 dated 20-9-22 & NO: 356-362 Dated 21-11-22

WHEREAS, Mst; Rahela Nazir remained absent from her duty without any prior sanction of the competent authority.

WHEREAS, Show cause notice was served upon her by DEO (F) Concerned under Rule-7 of the E&D Rules 2011 on 9-5-2023 bearing endst; NO :4648-51 under registry through Saidu Sharif Post office NO:435 dated 2-6-2023 but she failed to reply

WHEREAS, an absent notice was published in two leading news papers against Mst; Rahela Nazir EX CT on 14-6-2023 in Dally Mashriq Peshawar & Daily Chand Swat, and again she failed to reply to notices and remained absent.

WHEREAS, DEO (F) Swat given her opportunity of personal hearing under Rule-15 of E&D Rules 2011 and she attended the office of the DEO(F) Swat on 24-6-2023 and accepted her guilt of absenteeism and she submitted her reply of show cause notice on the same day, with apology and promised that "I will never give any chance of compliant" and joined her duty on 19-6-2023 and deposited the salary as recovery Rs.120386/- already received during the absence period as well as leave period during Ad-hoc employee and the absence period 1.3.2023 to 18-6-2023 was converted into leave without pay on 17-7-2023.

Whereas That the appellant then after requested for leave on medical ground w.e.f 1-8-2023 to 1-12-2023 as per Saidu Group of teaching Hospital outpatient department (OPD) Chit 210102 dated 9-8-2023 and not up to 1-12-2023 but like fraudulent practice reflects malafide on her part which could not be consider for the best interest of students because she indulged herself in breach trust due to continues absenteeism and deviation from her apology and promise for regular

Now, therefore, After thorough discussion on the matter the appellate authority Director decided that the appeal of Mst. Rahela Nazir D/O Nazir resident of CT BPS-15 GGMS Gul Shah District Swat is not maintainable and hence regretted under rules 17 (2) (a) of the E& D Rule, 2011 in the best interest of public service.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

2. Enclosure 017779 / P.No 392/vnl; 1 appeal Swat Dated Pash: the 18-01/2024

- Copy to, forwarded for information to the:-
1. District Education Officer (Female) (F) Swat
 2. District Accounts Officer (Swat)
 3. Director, P.S.S. RP, Local Directorates, Peshawar.



OFFICE OF THE
DISTRICT EDUCATION OFFICER (F) SWAT

☎ # (0946) 924 0214 📠 # (0946) 9240214

Email: deofswat@gmail.com www.female.sed.edu.pk

OFFICE ORDER

Whereas Mst. Raheela Nazir D/O Nazir Ahmat resident of Bahrain Swat, bearing CNIC No. 15602-2302081-4, appointed on 4.1.2019 as CT and Posted at GGMS Galshah (Present Station) and availed leave w.e.f 5.9.2021 To 5.10.2022, 1.11.2022 To 15.11.2022 and similarly remained absent w.e.f 1.3.2023 To 18.6.2023 which was converted in to leave without Pay and recovery was made in this regard.

Whereas Headmistress GGMS Galshah reported her absenteeism on 13.4.2023 with the remarks that she did not take interest in her duty and absent w.e.f 16.3.2023.

Whereas under Rule-7 of the E&D Rules, 2011, the undersigned issued show cause Notice to Mst. Raheela Nazir on 9.5.2023 to her official address as well as her Home address through saidu Mairif Post Office under registry No 435 dated 2.6.2023 but she failed to reply in her defence.

Whereas correspondence made with the regional director Information Swat vide No 4952 dated 12.6.2023 for notices in Two Leading Newspaper to Mst. Raheela Nazir CT which was published on 14.6.2023 in Daily MASHRIQ Peshwar & Daily CHAND Swat but again she failed to reply of the Notices and remained absent.

Whereas opportunity was given to Mst. Raheela Nazir CT under rule-15 of E7D Rules-2011 for Personal Hearing and she attended the office on 24.6.2023 and accepted her guilt of absenteeism and she submitted her reply of show cause notice on the same day, 24.6.2023 with apology and promised that "I will never give you any Chance of complaint"

Whereas she Mst. Raheela Nazir CT joined her duty on 19.6.2023 and deposited the salary as recovery Rs. 120366/- through Challan dated 12.7.2023 which she received during the absence period as well as leave period during Ad-hoc employee and the absence period 1.3.2023 To 18.6.2023 was Converted into leave without Pay on 17.7.2023.

Whereas Mst. Raheela Nazir CT requested for leave on Medical ground w.e.f 1.8.2023 To 1.12.2023 duly forwarded by the Headmistress on 10.8.2023 but leave granted only for the Period w.e.f 1.8.2023 to 15.8.2023 vide DEO(F) Swat office order under Endstt; No. 9791-94 dated 19.8.2023 due to the reason that as Per saidu Group of teaching Hospital, Outpatient Department (OPD) Chit. No. 210102 dated 9.8.2023, Doctor advised her for complete home bed rest for 07 days and not upto 1.12.2023 but such like fraudulent Practice reflects malafide on her part which could not be considered for the best interest of the children students because she indulged herself in Breach of Trust due to continuous absenteeism and deviation from her apology and Promise for regular duty but could not maintained by her.

Whereas Mst. Raheela Nazir again reported by the Headmistress on 6.9.2023 that she is continuously absent from duty w.e.f 16.8.2023 and a Notice again issued to her vide office Memo. No. 7711 dated 12.9.2023 on her school address through Postal Registry No. 698 dated 13.9.2023 as well as on her Home address through Postal Registry No. 699 dated 13.9.2023 but she did not bother and remained absent while the Headmistress again submitted report on 25.9.2023 about her absenteeism w.e.f 16.8.2023.

In view of the above Mst. Raheela Nazir found guilty of habitual absenteeism w.e.f 16.8.2023 read with her Previous absenteeism for which she apologized but could not maintained and indulged herself in continuous absenteeism therefore I Dr. Shamim Akhtar DEO(F) Swat as competent authority exercised her power removed under sub rule 7 of the E&D Rules, 2011 and imposed upon Major penalty of removal from Service under Rule-4(b)(iii) of the ibid rules and Mst. Raheela Nazir CT GGMS Galshah (Now GGHS Galshah) Mairif Swat is hereby Removed from Service from the date of her last attendance 16.8.2023.

(DR. SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER (F)
SWAT

Handwritten signature and initials
copy

To,

Director,
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

SUBJECT: DEPARTMENTAL APPEAL FOR REINSTATEMENT OF SERVICES.

Respected Sir,

With great reverence it is submitted that the undersigned was appointed as CT BPS-15 and posted at Government Girls Middle School Gul Shah Swat vide notification dated 04.01.2019. The undersigned performed her duties with zeal and devotion and up to the entire satisfaction of senior management which is evident from the record as there is no complaint against her in entire service.

It is further to inform that during my service I got married & resultantly shifted to Peshawar and requested for Inter-District transfer vide endorsement No 1979 dated 16.03.2023 from District Swat to Peshawar under the spouse policy of the Provincial Govt. It is pertinent to mention here that an NOC for transfer from District Education office (Female) Swat has also been received and submitted accordingly in the office of DI-O (F) Peshawar.

It is also to be mention here that even after the submission of application, the applicant performed her duties at the said school however in the meantime due to severe back pain I could not continue my duties after advise from a doctor for a complete bed rest, hence therefore requested for grant of medical leave with effect from 01.08.2023 to 01.12.2023.

The applicant has not been informed regarding sanction of leave, rather proceeded departmentally without any intimation/notice and termination order issued on dated: 02-10-2023 accordingly.

In view of the above it is therefore humbly requested to kindly reinstate my services to continue my job with all back benefits in the best public interest, please

Copy for information:

- i) District Education Officer (Female) Swat
- ii) PS to Secretary Elementary & Secondary Education Department, Peshawar.

Attested to be true
Copy

POWER OF ATTORNEY

In the court of

KP Semic Tribunal Peshawar

Raheela Nazki

Versus

Govt of KP & others

..... Petitioner/Plaintiff/Appellant

..... Respondent/Defendant

KNOW ALL to whom these presents shall come that I the undersigned / the appellant appoint:

Mr. YASIR SALEEM, Advocate Supreme Court of Pakistan, ^{M. Shujauddin} Advocate

(herein after called the advocate) to be the Advocate for the Petitioner/Plaintiff/Appellant or Respondent/Defendant in the above mentioned case, to do all the following acts, deeds and things or any of them, that is to say

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this ____ day of _____ 2023.

Executant/Executants Raheela Nazki

Accepted subject to the terms regarding Professional Fee

M. SHUJA UDDIN
Advocate Peshawar

[Signature]

YASIR SALEEM

Advocate Supreme Court of Pakistan

Legal Advisor, Services & Labor Law Consultant

FR-4, 4th Floor, Bilour Plaza, Peshawar Saddar.

Cell No. 0331-8892589 Email: yasirsaleemadvocate@gmail.com