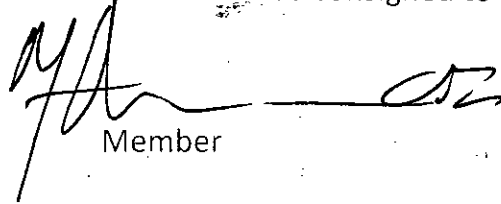


Appeal No. 745/2015
Mst. Uzma Sarfraz vs Govt.

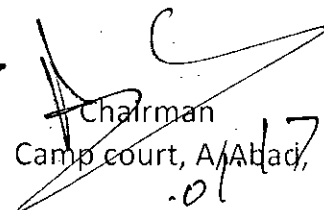
17.01.2017

Counsel for the appellant and Mr. Muhammad Siddique, Senior Government Pleader alongwith Mr. Muhammad Usman Senior Clerk for the respondents present. Arguments heard. Record perused.

Vide our detailed judgment of to-day placed in connected service appeal No. 744/2015 titled "Shahida Bibi Versus Government of Khyber Pakhtunkhwa through Secretary, E&SE Peshawar and others", we accept the instant appeal also as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record room.



Member



Chairman
Camp court, A/Abad,

ANNOUNCED

17.01.2017

17.01.17

24.08.2016


On the request of counsel for the appellant file has been requisitioned.

Counsel for the appellant has submitted an application for restraining the respondents from filling up the post of appellant till final decision of the appeal. Notice of application be issued to the respondents for reply/arguments on the date fixed i.e. 23.09.2013 before S.B at camp court, Abbottabad.


Chairman

23.09.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Written replies by respondents No. 1 to 3 submitted. Learned Sr.GP relies on the same on behalf of respondent No. 4. The appeal is assigned to D.B for rejoinder and final hearing for 17.01.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad


19.5.2016

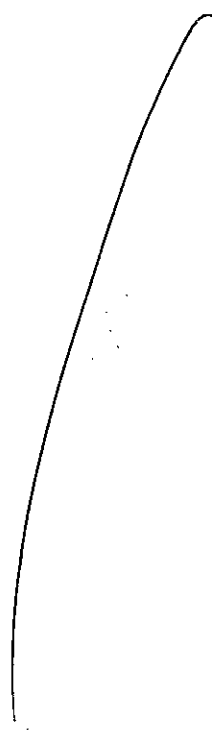
Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk along with Mr. Muhammad Siddique, Sr GP for the respondents present. Amended appeal submitted. Notice of amended appeal be issued to the respondents. To come up for written reply/comments on amended appeal before S.B on 19.08.2016 at camp court, Abbottabad.


Chairman
Camp Court, A/Abad.

19.08.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk along with Mr. Muhammad Siddique Sr.GP for the respondents present. Requested for adjournment. To come up for written reply on amended memo: of appeal on 23.09.2016 before S.B at camp court, Abbottabad.


Chairman
Camp Court, Atd.



21.1.2016

Mr. Muhammad Zahid, husband of the appellant and Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Application for permission for filing amended appeal has already been submitted. To come up for reply on application before S.B on 20.4.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad

20.04.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Muhammad Siddique, Sr.GP for the respondents present. Reply to application not submitted. Arguments on application heard and record perused.

Appellant is seeking amendment in the service appeal as departmental appeal of the appellant dated 19.3.2015 was not decided at the time of filing of appeal which was decided thereafter on 25.08.2015. Learned counsel for the appellant intends to impugn the same by amending the appeal.

Since the departmental appeal of the appellant has been decided after filing of the service appeal and the appellant intends to impugn the same as well, as such the application is allowed and appellant shall therefore submit amended appeal in office within two weeks which shall be placed before this court (S.B) after scrutiny by the Registrar, on 19.05.2016 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

3

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant and was serving as such when dismissed from service vide impugned order dated 3.3.2015 on the allegations of procuring illegal appointment regarding which she preferred departmental on 19.3.2015 which was not responded and hence the instant service appeal on 6.7.2015.

That the appellant was appointed in the prescribed manners and that no inquiry whatsoever was conducted in the prescribed manners and as such the impugned order is a nullity in the eye of law.

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 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.

Appellant Deposited
Security & Process Fee




Chairman
Camp Court A/Abad

20.10.2015

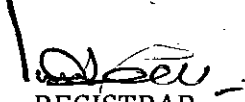

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 21.01.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 775/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06.07.2015	<p>The appeal of Mst. Uzma Sarfaraz presented today by Mr. Abdul Saboor Khan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The amended appeal of Mst. Uzma Sarfraz d/o Sarfraz Ex-PST GGPS Badal Garan Tehsil Balakot received to-day i.e. on 12.05.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

1- Annexures-B, H and K of the appeal are illegible which may be replaced by legible/batter one.

No. 771 /S.T,

Dt. 13/5 /2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M.Asif Yousafzai Adv. Pesh.

Respected Sir

1- Removed



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

Appeal No.745/2015

Amended Appeal

Uzma Sarfraz

v/s

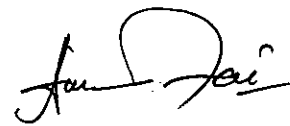
Education Deptt:

INDEX

S.No	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	1-7
2.	copy of educational record	- A -	8-17
3.	Copies of advertisement	B	18
4.	Copy of ETA result	- C -	19
5.	Copy of letters	D,D1,D2& D3	20-23
6.	Copy of Appointment Letter	- E-	24-25
7.	Copy of pay slip	- F -	26-27
8.	Copy of the letter of election duty	-G-	28
9.	Copy of show cause notice	-H-	29
10.	COPY OF REPLY TO SHOW CAUSE	-I-	30-31
11.	Copy of order dated 23.1.2015	-J-	32-34
12.	Copy of impugned order dated 3.3.2015	-K-	35
13.	Copy of transfer order dated 6.3.2015	-L-	36-37
14.	Copy of departmental appeal and receipt	-M & M1-	38-40
15.	copy of rejection order dated 25.8.2015	-N-	41
16.	copy of application and order dated 26.4.2106	-O & O1-	42-45
17.	Vakalat Nama	-----	46

APPELLANT

Through:



**(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.**

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO.745/2015

Amended Appeal

**G.W.F. Province
Service Tribunal
Diary No. 468
Dated 12-5-2016**

Mst. Uzma Sarfraz, D/O Sarfraz Ahmad,
R/O Josacha, Tehsil Balakot District Mansehra,
Ex-PST Government Girls Primary School, Badal Garan,
Tehsil Balakot, District Mansehra.....

APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat, Peshawar.
2. The Director (E&SE), Education Department, K.P, Peshawar.
3. The Distt; Education Officer (Female) (E&SE), ~~Peshawar~~ Mansehra *Distt*
4. The District Accounts Officer, Mansehra.....

RESPONDENTS

AMENDED APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 03.3.2015 AND REJECTION ORDER DATED 25.8.2015 WHICH WAS PASSED BY THE DEPARTMENT AFTER APPEAL FILLED IN TRIBUNAL WHEREBY THE DEPARTMENTAL APPEAL OF APPELLANT AGAINST THE ORDER OF DIMISSAL FROM SERVICE HAS BEEN REJECTED FOR NO GOOD GROUNDS, HOWEVER DIMISSAL ORDER IS CONVERTED IN TO REMOVAL FROM SERVICE.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER DATED 03.3.2015 AND 25.08.2015 MAY BE SET ASIDE AND THE APPELLANT MAY BE RE-INSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant is resident of Josacha (U/C Ghanool), Tehsil Balakot District Mansehra. That the appellant is fully qualified and having the required Documents/certificates. (A copy of educational record are attached as Annexure-A).

2. That the District Education Officer, Mansehra/respondent No.3 advertised some vacancies in Daily Mashriq. **(A copy of advertisement is attached as Annexure-B).**
3. That, as per procedure, the appellant applied for the post of PST being a qualified teacher having required qualification. E.T.A test was conducted on 26.2.2011 and the appellant appeared as a candidate and obtained 136 marks out of 300 under roll No. 1701771. **(Copy of E.T.A test result is attached as Annexure-C).**
4. That the one other post were created before the process of appointment after advertisement as whereby two post were vacant at Govt: Girls Primary School Badal Garan. There is also same situation at Govt primary School Karmang Payeen, GGPS Kalas Ghaneela and GGPS Bhuraj. **(copy of Letter is attached as annexure-D, D-1, D-2 & D-3).**
5. That then the EDO conducted interview and scrutinize the documents of the candidates, and merit list of the candidates was displayed for receiving objections. After the official process, the meeting of DSC was held and approved the case of PST candidates for appointment against the vacant post of PST and on the acceptance of the appeal by the competent authority the appointment order of the appellant was issued under Endst. No.6830-39/Estt: Appt: PST/2011-2012 Dated 31.5.2012 and the appellant was posted at GGPS Badal Garan and later on Transferred and adjusted to different Schools. **(Copy of Appointment Letter is attached as Annexure – E).**
6. That on the acceptance of the appeal by the competent authority the appointment order of the appellant was issued under Endst. No.6830-39/Estt: Appt: PST/2011-2012 Dated 31.5.2012 and the appellant was posted at GGPS Badal Garan where two posts were vacant at the time but the appellant was removed from service by showing reason that there is only one vacant post which was discriminatory because in other school where vacant posts were created after advertisement and teachers were appointed are still holding the posts.

7. That the appellant performed her duties very honestly, regularly and fairly since the time of her appointment in above mentioned different school and also received her salaries, from December 2014 to May 2015. **(Copy of pay slip is attached as annexure-F).**
8. That the appellant was also directed to perform election duty during the local election of 2015. **(Copy of the letter of election duty is attached as annexure-G).**
9. That the appellant was continuously performing her duties without any break for the period for which the salaries were received and has never been found guilty of any kind of absenteeism, truancy, misconduct, misfeasance, malfeasance or nonfeasance, nor been found guilty of dereliction of duty without taking these things into consideration, the respondent no.3 issued show cause notice to the appellant leveling baseless allegations against the appellant there in. **(Copy of show cause notice is attached as Annexure-H).**
10. That appellant properly submitted reply to show cause notice and denied all the alleged allegations therein. **Copy of reply is attached as Annexure-I).**
11. That on 23.1.2015, after the show cause order having been passed, another adjustment order was passed on 23.1.2015 in which the appellant was adjusted to Bangian from Badal Garan. **(Copy of order dated 23.1.2015 and relieving and arrival report is attached as Annexure-J)**
12. That the appellant appointment was terminated through impugned dismissal order dated 3.3.2015 by imposing major penalty of dismissal from service. **(Copy of impugned order dated 3.3.2015 is attached as annexure-K).**
13. Similarly after dismissal, mutual transfer order of the appellant was passed vide which the appellant was transferred from Bangian to Loon on dated 6.3.2015. **(Copy of transfer order dated 6.3.2015 is attached as annexure-L).**
14. That the appellant filed a departmental appeal against the order dated 3.3.2015 but the departmental appeal of appellant against the order of dismissal from service dated. 3.03.2015

which was not responded within statutory period, then the appellant preferred a service appeal No. 745/2015 before the KPK Service Tribunal Peshawar. **(Copy of departmental appeal and receipt attached as Annexure-M & M1).**

15. That during the pendency of appeal the appellate authority has issued notification dated 25.8.2015, whereby the departmental appeal of the appellant has been rejected however the appellant penalty order issued by the DEO Female, Mansehra vide order dated 3.3.2015, is modified to the extent of conversion of penalty of dismissal in to removal from service. **(copy of rejection order dated 25.8.2015 is attached as Annexure-N).**
16. That thereafter, the appellant filled an application for amendment of appeal which was allowed by the Honorable Tribunal vide order dated 26.4.2016. Hence the amended appeal on the basis of following grounds amongst others. **(Copy of application and order dated 26.4.2106 are attached as annexure-O & O1).**

GROUND:

- A) That the impugned order dated 3.3.2015 and 25.8.2015 are against the law, facts, norms of justice, arbitrary fanciful, perverse, without lawful authority, based on malafide, unconstitutional and against the relevant rules and regulation hence not maintainable and liable to be set aside.
- B) That the service of the appellant was terminated on the fact that the appellant appointment was the result of misuse of the authority by the then EDO Mr. Umer Khan such fact cannot legally be made base for removal from the service and same is the case of appellant. The appellant legally, as per the rule of good governance and in the light of her fundamental rights guaranteed in the constitution could have not been penalized with major penalty for act, howsoever illegal, unjustified and without jurisdiction of then EDO Mr. Umer Khan.
- C) That however the appellant penalty order issued by the DEO Female, Mansehra vide order dated 3.3.2015, is modified

the extent of conversion of penalty of dismissal in to removal from service by showing reason that there is one vacant post.

- D) That, perusal of first Para of impugned show cause notice is self-explanatory and worth considering for reinstatement of the services of the appellant.
- E) That there is no ill-gotten means against the appellant and section-20 of General Clause Act is not applicable to the case of the appellant because appellant has not been found guilty of any misconduct or procuring her service through any fraudulent means.
- F) That in the light of authoritative decision / views of the superior judiciary including the Supreme Court of Pakistan , the service of the appellant could not have been terminated and the impugned order could not have been issued because where the authority is guilty of irregularities, illegalities and procedural violations, the service of an employee cannot be terminated.
- G) That the appellant have been not allowed fair opportunity of personal hearing, thus the appellant have been condemned unheard.
- H) That no proper procedure has been followed before awarding appellant the major penalty, no proper inquiry has been conducted, the appellant have not been properly associated with the inquiry proceedings, statements of witnesses if any were never taken in the appellant presence nor the appellant have been allowed opportunity of cross examination, thus the proceedings so conducted are defective in the eye of law.
- I) That there is allegation in the show cause notice that the appellant never appeared in the selection process of the candidates and her name did not fall in the merit list prepared for the selection of candidate. This fact is belied from the merit list annexed herewith, reply submitted in the Honorable High Court in response to C.O.C filed by the present appellant therein.
- J) That the respondent no.3 is the occupier of dual post of D.E.O and S.D.E.O Mansehra and have passed first the dismissal

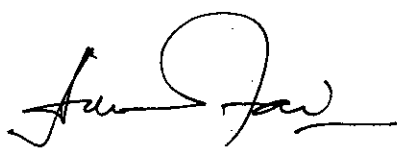
order then the adjustment order in which the appellant was adjusted from Badal Garan to Bangian after having been purportedly dismissed from the service by the same office respondent no.3 has played with the service of the appellant and the same fact is against the law, rules, law of administration, procedure and good governance.

- K) That the conduct and attitude of the respondents is amounting to discrimination because the appellant was removed from the service by showing reason in rejection order of departmental appeal that there is one vacant post available in appellant UC but the same situation was in others UC which mentioned above in Para-4 but no one was removed from that UC, the teachers in that UC was still working on his posts.
- L) That on the acceptance of the appeal by the competent authority the appointment order of the appellant was issued under Endst. No.6830-39/Estt: Appt: PST/2011-2012 Dated 31.5.2012 and the appellant was posted at GGPS Badal Garan where two posts were vacant at the time but the appellant was removed from service by showing reason that there is only one vacant post which was discriminatory because in other school where vacant posts were created after advertisement and teachers were appointed are still holding the posts.
- M) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
Uzma Sarfraz

Through:


(M. ASIF YOUSAFZAI)
Advocate, PESHAWAR

AFFIDAVIT

It is affirmed and declared that the contents of appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'ble Tribunal.


Deponent

Amesur 'A' (8)

Allama Iqbal Open University
Islamabad



Serial No. 199172

Certified that *Mr/Ms* UZMA SARFARAZ
Son/Daughter of SARFARAZ AHMAD
Registration No 07-NMA-1853 *Roll No* Z-656027
Semester SPRING 2008 *having met all the requirements under*
the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured 67 % *marks*
and has been placed in B *grade*



Result declared on: **March 14, 2009**

Date of issue: **February 28, 2011**

Attested
[Signature]
Raza Mudhammad Khar
Subject Specialist B-18
G.H.S No:1 Manser
Controller of Examinations

ATTESTED

Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

A

ADA No. 125755

Roll No. 56375

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
 SESSION ANNUAL 2003

This is to certify that UZMA SARFARAZ
 Son/Daughter of SARFARAZ AHMAD
 A candidate from GOVT. GIRLS' HIGH SCHOOL GARHI HABIBULLAH MANSEHRA
 has passed the Secondary School Certificate Examination of the Board of
 Intermediate and Secondary Education, Abbottabad held in March 2003 as a
 Regular/Private Candidate. He/She obtained 501 marks out of 850 and has been
 placed in Grade C Representing GOOD.

The candidate passed in the following subjects.

- | | | | |
|------------|---------------|-----------------|-----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK. STUDIES |
| 5. MATHS | 6. G. SCIENCE | 7. ISL. STUDIES | 8. EHE |

Date of Birth according to admission form is ELEVENTH MARCH
ONE THOUSAND NINE HUNDRED AND EIGHTY SIX (11/03/1986)

[Signature]
 Asstt. Secretary

[Signature]
 Attested

[Signature]
 Secretary

This certificate is issued without alteration or erasure.

ATTESTED

[Signature]

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD
DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination

(Class X)

Session: 2003 (Annual)

Group (HUMANITIES GROUP)



Name: Uzma Sarfaraz

Father's Name: Sarfaraz Ahmad

Roll No. 56375

Subjects	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In Words
1. English	150	50	47	97	Ninety-Seven
2. Urdu	150	39	56	95	Ninety-Five
3. Islamiyat	75	53		53	Fifty-Three
4. Pakistan Study	75	46		46	Forty-Six
5. New Rizvi	100	33		33	Thirty-Three
6. General Science	100	50		50	Fifty Only
7. Islamic Study	100	70		70	Seventy Only
8. Elements Of Home Economic	100	57		57	Fifty-Seven

Total: 850

501:0	Five Hundred One Only
-------	-----------------------

Remarks:

Checked By: _____

Date: 25-06-2003

Note: Errors / Omissions are excepted.

Khaksar and BRAINS Software Enterprise (KBSoft)

Controller of Examinations
 BISE Abbottabad

All Star
Raza
 Raza Mudammad Khar
 Subject Specialist B-18
 G.H.S. No. Manohra

ATTESTED

A

ADA No 060050

Roll No. 42982

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2006

Humanities Group

This is to certify that UZMA SARFRAZ

Daughter of SARFRAZ AHMED

A candidate from PPC GGHSS GARI HABIBULLAH MANSEHRA

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 2006 as a Regular Candidate. She has obtained 692 marks out of 1100 and has been placed in Grade B Representing VERY GOOD.

The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

- | | | |
|--------------------|-----------|---------------------------|
| 1. ENGLISH | 2. URDU | 3. ISL. EDU. PAK. STUDIES |
| 4. ISLAMIC HISTORY | 5. CIVICS | 6. ISLAMIC STUDIES |


Asstt. Secretary


This certificate is issued without alteration or erasure.
Subject Specialist


Secretary

ATTESTED



39122

Certificate No: _____

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD


 Roll No: 10087
 Group: HUMANITIES

RESULT CARD HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Part - I

Session: 2005 (Annual)

 Name: UZMA SARFARAZ
 Father Name: SARFARAZ AHMED
 Reg No: 0044182016
 Institution/ District: PPC GGHSS GARI HABIB ULLAH
 District: MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-I held in the month of May/June as a Regular Candidate

Subjects	Marks	Marks Obtained			Marks in Words
		Theory	Pract	Total	
English	100	53		53	Fifty-Three
Urdu (Comp)	100	64		64	Sixty-Four
Islamic Education	50	38		38	Thirty-Eight
Islamic History	100	52		52	Fifty-Two
Civics	100	43		43	Forty-Three
Islamic Studies	100	71		71	Seventy-One
Total : 550				321	Three Hundred Twenty-One Only

Remarks : _____

Date : 11-August, 2005

Checked By : _____

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad.
Visit us: www.biseatd.edu.pk

 Controller of Examinations
 Subject Specialist
 GHSS Karori Mansera

ATTACHED

(18) P-18

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Certificate No: 206042982

Roll No: 42982
Group: HUMANITIES

DETAILED MARKS CERTIFICATE
HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Part - II
Session: 2006 (Annual)

Name: UZMA SARFARAZ
Father Name: SARFARAZ AHMED
Institution: PPC GGHSS GARI HABIB ULLAH MANSEHRA
District: _____

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May / June as a Regular Candidate

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	53	--	69	--	122	One Hundred Twenty-Two
Urdu (Comp)	200	64	--	67	--	131	One Hundred Thirty-One
Islamic Education	50	38	--	--	--	38	Thirty-Eight
Pakistan Studies	50	--	--	43	--	43	Forty-Three
Islamic History	200	52	--	60	--	112	One Hundred Twelve
Civics	200	43	--	70	--	113	One Hundred Thirteen
Islamic Studies	200	71	--	62	--	133	One Hundred Thirty-Three
Total: 1100						624	Six Hundred Twenty-Four Only

Date: 05-August, 2006

Remarks: _____

Checked By: _____

Controller of Examinations

Errors / Omissions: excepted. Any mistake in Name, Father Name etc must be intimated 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.bise.edu.pk

ATTESTED

Certificate No: 12313807

HAZARA UNIVERSITY, MANSEHRA N.W.F.P, PAKISTAN
DETAILED MARKS CERTIFICATE
BA ANNUAL EXAMINATION 2007
Part - I



Roll No: 28138

Reg: No: 0092MAFPX-BA7

Name: UZMA SARFRAZ
Father Name: SARFARAZ AHMAD
Institution/ District: MANSEHRA

Course Name	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
English	75		25	--	25	Twenty-Five	
Urdu	75		41	--	41	Forty-One	
Islamiyat	60		35	--	35	Thirty-Five	
Islamic Studies	75		31	--	31	Thirty-One	
Total: 285					132	One Hundred Thirty-Two Only	

Checked By: _____

Prepared in: Computer Section, Hazara University.

Note: Errors / Omissions excepted with in 30 days of issuance date of this Certificate.

Controller of Examinations
Hazara University, Mansehra
September 26, 2007

www.ijed.com
A



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 19491

DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2009

Roll No: 42724

Reg No: 0992MAFPX-BA7

Name: Uzma Sarfraz

F/ Name: Muhammad Sarfraz

Institution/ MANSEHRA

Part: Second

District _____

COURSE TITLE:	Max: Marks		Marks Gbt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks	285				132	ONE HUNDRED THIRTY-TWO	
ENGLISH	75		24		24	TWENTY-FOUR	Pass
URDU	75		42		42	FORTY-TWO	Pass
PAKISTAN STUDIES	40		27		27	TWENTY-SEVEN	Pass
ISLAMIC STUDIES	75		42		42	FORTY-TWO	Pass
					267	TWO HUNDRED-SIXTY-SEVEN	

Total: 550

Percentage: 48.55

Division: SECOND



Print Date: 31-08-2009

Checked By: [Signature]

[Signature]
Assistant District Edu. Officer
Etab. Mansehra

[Signature]

Controller Examinations
Hazara University, Mansehra
August 29, 2009

Errors and omissions are subject to subsequent rectification.
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

REGISTERED

[Signature]



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

SN: 0992

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (PREVIOUS)
ANNUAL EXAMINATION 2011

Roll No: 16894

Reg No: 9092MAFPX-BA7

Name: Uzma Sarfraz

Father's Name: Muhammad Sarfraz

Institution / District: MANSEHRA

Subject: Urdu

Course Title:	Max. Marks:		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
History of Urdu Literature	100		40		40	FORTY	Pass
Fiction	100		43		43	FORTY-THREE	Pass
Prose	100		52		52	FIFTY-TWO	Pass
Modern Prose	100		49		49	FORTY-NINE	Pass
Ghazal	100		44		44	FORTY-FOUR	Pass
Total:			500		228	TWO HUNDRED TWENTY-EIGHT	
Percentage:			45.60				

Print Date: 31-01-2012

Checked By:

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name, etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations
Hazara University, Mansehra
January 31, 2012

ATTESTED

Supervisor
G.H.S. Mansehra

17

SNo: 2205



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2013

Roll No: 36633

Reg No: 0092MAFPX-BA7

Name: Uzma Sarfraz

F/ Name: Muhammad Sarfraz

Institution/ MANSEHRA
District

Subject: Urdu

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA: Previous Marks	500				228	TWO HUNDRED TWENTY-EIGHT	
Poetry "Nazam"	100		57		57	FIFTY-SEVEN	Pass
Qasceda, Masnavi & Marsia	100		61		61	SIXTY-ONE	Pass
Iqbaliat	100		55		55	FIFTY-FIVE	Pass
Criticism	100		50		50	FIFTY	Pass
Essay	100		53		53	FIFTY-THREE	Pass
General Viva Voce	100		59		59	FIFTY-NINE	Pass
Total	1000				563	FIVE HUNDRED SIXTY-THREE	
Percentage: 51.18							
Division: SECOND							

Print Date: 10-03-2014

Checked By: _____

Attested

 Controller Examinations
 Hazara University, Mansehra
 March 05, 2014

Errors and omissions are subject to subsequent rectification.
 Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

REGISTERED

A

تعمیراتی کاموں کی قیمتوں کی کمی

تعمیراتی کاموں کی قیمتوں کی کمی کے بارے میں...

Table with 2 columns: Item Name, Price/Value

Table with 2 columns: Item Name, Price/Value

Pre Bid Meeting details and schedule

نوٹس

- List of notices and conditions for the bid process

Contact information and address

تعمیراتی کاموں کی قیمتوں کی کمی کے بارے میں...

Main table with 4 columns: Item No, Description, Price, Quantity

نوٹس اور شرائط کے بارے میں تفصیلی معلومات

Additional contact and administrative details

ATTESTED

Annex - C / 23

199

TAT-1 FEMALE MANSEHRA RESULT 2011 Annex C

Roll No	Name	Father Name	Marks	%age
1701750	MAZIA BIBI	FAQIR MOHD	128	42.67
1701751	SADIQA NAWAZ	MIAJI NAWAZ	64	Fail
1701752	SADAF	SHOUKAT ALI	100	Fail
1701753	SAFEENA BIBI	NAZIR MOHD	Absent	#VALUE!
1701754	ABIDA BIBI	ALI BAHDAK	92	Fail
1701755	HIRA ASLAM	ASLAM KHAN	72	Fail
1701756	HASINA BIBI	MOHD PARVEZ	92	Fail
1701757	GULNAZ BIBI	MOHD AYUB	60	Fail
1701758	SABA GUL	MOHD PARVEZ	108	Fail
1701759	SAMMAN	HAQNAWAZ	116	Fail
1701760	NOSHEEN NIAZ	NIAZ MOHD	124	41.33
1701761	TABSUM BIBI	ABDUL RASHID	136	45.33
1701762	SUMIRA	ABDUL HAMID	124	41.33
1701763	MAHJABEEN	MOHD MASOOD	156	52.00
1701764	UZMA	SARFARAZ	136	45.33
1701765	BIBI NAZEEN	MOHD MASOOD	128	42.67
1701766	ABHA BIBI	SAIN MOHD	104	Fail
1701767	BIBI ASIA	MOHD MUSTAQ	104	Fail
1701768	RIZWANA BIBI	MISRI SIYAL	104	Fail
1701769	SHAFIQA	BASHIR AHMED	84	Fail
1701770	FAIZA RANI	MOHD FAREED	84	Fail
1701771	SAIRA	MOHD ANWAR	48	Fail
1701772	SHAHBANA	JEHANZEB	124	41.33
1701773	NAZIA SHAH	SHAD MOHD	124	41.33
1701774	NOSHEEN GUL	AMAM DIN	140	46.67
1701775	NUZHAT SHAHEEN	AMAM DIN	128	42.67
1701776	HAMIDA BIBI	BAHADUR KHAN	144	48.00
1701777	NIOGHAT SHAHEEN	IMAM DIN	140	46.67
1701778	MUSSRAT SHAHEEN	AMAM DIN	152	50.67
1701779	SHAMZA	AURAN GZEB	160	53.33
1701780	BIBI FARHAT	AURAN GZEB	120	40.00
1701781	SUGRA	MOHD IQBAL	112	Fail
1701782	HASINA NAZ	SARWAR SHAH	100	Fail
1701783	NAVEEDA PARVIN	SAIN MOHD	88	Fail
1701784	SIDRA BEGUM	SAIN MOHD	188	62.67
1701785	SANJEEDA BIBI	SULTAN MOHD	40	Fail
1701786	SUMIRA	MOHD FAREED	72	Fail
1701787	ASIFA NOREEN	ABDUL SALAM	Absent	#VALUE!
1701788	ABIDA	ANWAR ZEB	116	Fail
1701789	TASLEEM KOSAR	ABDUL QAYUM	84	Fail
1701790	SAEEDA BANO	MOHD SALEH	92	Fail
1701791	NADIA RUBY	ABDUL RASHID	112	Fail
1701792	MUNEBA CHAND	MOHD BASHIR	152	50.67
1701793	KHUDIJA CHAND	MOHD ASLAM	160	53.33
1701794	SALMA BIBI	ABDUL REHMAN	156	52.00
1701795	TABSUM BIBI	GHULAM SARWAR	44	Fail
1701796	GUL NAZ	M MASKEEN	108	Fail
1701797	MILHAZ	MOHD BASHIR	112	Fail
1701798	SEHRISH BIBI	DURI AMAN	104	Fail
1701799	ASMA ZEB	ANWAR ZEB	160	53.33
1701800	BIBI SALMA	ABDUL QAYUM	64	Fail
1701801	RUKHSANA	MOHD RAFIQUE	72	Fail
1701802	ZAITOON BIBI	MOHD RAFIQUE	52	Fail
1701803	NABEELA SHEREEN	ABDUL QAYUM	80	Fail
1701804	UMARA AYUB	MOHD AYUB	64	Fail
1701805	RASHIDA BIBI	ABDUL QAYUM	144	48.00
1701806	CHAN BIBI	ABDUL QAYUM	128	42.67

ARRESTED

✱

23



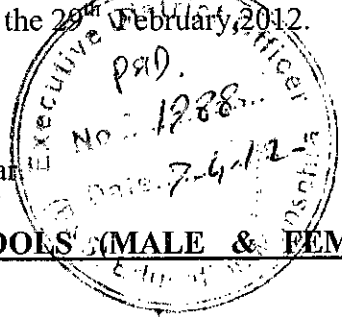
G.G.P.S. Kalas Ghaneela (D)

20

GOVT: OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

NO. BOV/FD/3-6/2011-12/Mansehra.
Dated Pesh: the 29th February, 2012.

3/12
2 (12)



The Secretary, Khyber Pakhtunkhwa,
Elementary & Secondary Education Department, Peshawar

Subject: - **ESTABLISHMENT OF GOVT; PRIMARY SCHOOLS (MALE & FEMALE)
DURING THE FINANCIAL YEAR 2011-12.**

Dear Sir,

I am directed to refer to your Department letter No. SO (B&A)2-41/09/Mansehra. dated 09/02/2012 on the subject noted above and to state that Finance Department agrees to the creation of following posts for **Govt: Girls Primary School Kalas Ghaneela** as newly completed Developmental scheme, on Temporary Basis in **District Mansehra w.e.f. 01.03.2012 at a total cost of Rs.129,300/-** as per details given below, subject to the observance of all codal formalities:-

<u>Details of Posts.</u>		
P-006-Primary School Teachers (B-7)		(02)
C-057-Chowkidar (B-1)		(01)
A01151- Pay of O/Staff.		65,600
A01202- House Rent Allowance		12,000
A01203- Conveyance Charges		12,800
A01207- Washing Allowance		400
A01208- Dress Allowance		400
A01217- Medical Allowance.		12,000
A0120X Adhoc Allowance 50%		20,100
AO121A Adhoc Allowance 2011		6,000
Total.		<u>129,300</u>

2- The Expenditure involved is debitable to the Functional-cum-Object classification 09-Education Affairs and Services 091-Pre-Primary and Primary Education Affairs and Services 0911-Pre-Primary and Primary Education Affairs and Services 091102- Primary A01-Employee Related Expenses and shall be met out from within Account-IV of the District concerned.

3- Audit copy may be prepared and sent to this department for authentication.

Yours faithfully,

}
(HAYAT-UR-REHMAN)
BUDGET OFFICER-V.

Endst: No. & date as above.

Copy forwarded to: -

- 1- The Director, Elementary & Secondary Edu: Khyber Pakhtunkhwa Peshawar.
- 2- The District Coordination Officer, Mansehra.
- 3- The Executive District Officer (E&SE) Mansehra.
- 4- The Executive District Officer, (Finance & Planning) Mansehra.
- 5- The Assistant Programmer-II, HR Wing Finance Department.
- 6- Master File.

ATTESTED

A

ref
29.02.12
BUDGET OFFICER-V.

Handwritten notes on the right margin: "18/5... 5360-5384 115"



DDO (F)
AO & P & D
D. Manshra.

Amour D,

(2)

GOVT: OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
NO. BOV/FD/3-6/2011-12/Mansehra.
Dated Pesh: the 11th April, 2012.

To

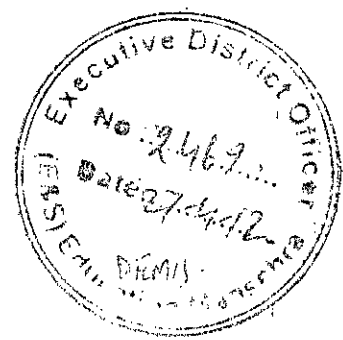
The Secretary to Govt: of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department, Peshawar.

Subject: - ESTABLISHMENT OF GOVT: PRIMARY SCHOOLS (MALE & FEMALE) DURING THE FINANCIAL YEAR 2011-12.

Dear Sir,

I am directed to refer to your Department letter No. SO (B&A)2-41/09/ Mansehra dated 09/03/2012 on the subject noted above and to state that Finance Department agrees to the creation of following posts for Govt: Girls Primary School Karmang Payeen as newly completed Developmental scheme, on Temporary Basis in District Mansehra with immediate effect at a total cost of Rs.97,000/- as per details given below, subject to the observance of all codal formalities:-

<u>Details of Posts.</u>		
P-006-Primary School Teachers (B-7)		(02)
C-057-Chowkidar (B-1)		(01)
A01151- Pay of O/Staff. Staff		49,200
A01202- House Rent Allowance		9,00
A01203- Conveyance Charges		9,600
A01207- Washing Allowance		300
A01208- Dress Allowance		300
A01217- Medical Allowance.		9,000
A0120X Adhoc Allowance 50%		15,100
AO121A Adhoc Allowance 2011		4,500
Total.		97,000



- 2- The Expenditure involved is debitable to the Functional-cum-Object classification 09-Education Affairs and Services 091-Pre-Primary and Primary Education Affairs and Services 0911-Pre-Primary and Primary Education Affairs and Services 091102- Primary A01-Employee Related Expenses and shall be met out from within Account-IV of the District concerned.
- 3- Audit copy may be prepared and sent to this department for authentication.

Yours faithfully,

(JAMSHID KHAN HALEEMZAD)
BUDGET OFFICER-V.

Endst: No. & date as above.

Copy forwarded to: -

- 1- The Director, Elementary & Secondary Edu: Khyber Pakhtunkhwa Peshawar.
- 2- The District Coordination Officer, Mansehra.
- 3- The Executive District Officer (E&SE) Mansehra.
- 4- The Executive District Officer, (Finance & Planning) Mansehra.
- 5- The Assistant Programmer-II, Finance Department.
- 6- Master File.

ATTESTED

[Signature]
SUPERINTENDENT(I)
Estt: Branch (DEO)
(F&P) Mansehra.

[Signature]
BUDGET OFFICER-V.

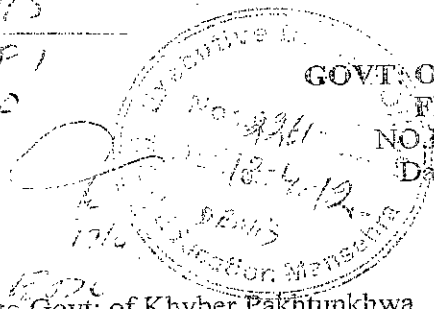
TO BE SUBSTITUTED FOR BEARING THE SAME NUMBER & DATE.

Amman - D2

22



11 D.D. 11/5
2) DDO (F1)
3) B&A



GOVT. OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
NO. BOV/FD/3-6/2011-12/Mansehra.
Dated Pesh: the 31st March, 2012.

To

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

Subject: - ESTABLISHMENT OF GOVT. PRIMARY SCHOOLS (MALE & FEMALE)
DURING THE FINANCIAL YEAR 2011-12.

Dear Sir,

I am directed to refer to your Department letter No. SO (B&A)2-41/09/ Mansehra dated 27/03/2012 on the subject noted above and to state that Finance Department agrees to the creation of following posts for Govt: Girls Primary School Badal Gran as newly completed Developmental scheme, on Temporary Basis in District Mansehra w.e.f. 01.04.2012 at a total cost of Rs.97,000/- as per details given below, subject to the observance of all codal formalities:-

Details of Posts.

P-006-Primary School Teachers (B-7)	(02)
C-057-Chowkidar (B-1)	(01)
A01151- Pay of O/Staff. Staff	49,200
A01202- House Rent Allowance	9,00
A01203- Conveyance Charges	9,600
A01207- Washing Allowance	300
A01208- Dress Allowance	300
A01217- Medical Allowance.	9,000
A0120X Adhoc Allowance 50%	15,100
AO121A Adhoc Allowance 2011	4,500
Total.	<u>97,000</u>

- 2- The Expenditure involved is debitable to the Functional-cum-Object classification 09- Education Affairs and Services 091-Pre-Primary and Primary Education Affairs and Services 0911-Pre-Primary and Primary Education Affairs and Services 091102- Primary A01-Employee Related Expenses and shall be met out from within Account-IV of the District concerned.
- 3- Audit copy may be prepared and sent to this department for authentication.

Yours faithfully,

(JAMSHID KHAN HALEEMZAD)
BUDGET OFFICER-V.

Endst: No. & date as above.

Copy forwarded to: -

- 1- The Director, Elementary & Secondary Edu: Khyber Pakhtunkhwa Peshawar.
- 2- The District Coordination Officer, Mansehra.
- 3- The Executive District Officer (E&SE) Mansehra.
- 4- The Executive District Officer, (Finance & Planning) Mansehra.
- 5- The Assistant Programmer-II, HR Wing Finance Department.
- 6- Master File.

ATTESTED

Z. Nawaz
SUPERINTENDENT(I)
Estt: Branch (DEO)
(Mansehra)

Jamshid Khan Haleemzad
BUDGET OFFICER-V.



GGPS Bhuraj

23/5/12

23

Mansehra-D3

GOVT: OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
NO.BOV/FD/3-6/2009-10/Mansehra.
Dated Pesh: the 7th February,2012.

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

Subject: - **ESTABLISHMENT OF GOVT;PRIMARY SCHOOLS (MALE & FEMALE)
DURING THE FINANCIAL YEAR 2011-12.**

Dear Sir,

I am directed to refer to your Department letter No. SO (B&A)2-41/09/Mansehra dated 13/01/2012 on the subject noted above and to state that Finance Department agrees to the creation of following posts for **Govt:Girls Primary School Bhuraj** as newly completed Developmental scheme, on Temporary Basis in **District Mansehra w.e.f. 01.03.2012 at a total cost of Rs.137,300/-** as per details given below, subject to the observance of all codal formalities:-

Details of Posts.

P-006-Primary School Teachers (B-7)	(02)
C-057-Chowkidar (B-1)	(01)
A01151- Pay of O/Staff. Staff	65,600
A01202- House Rent Allowance	12,000
A01203- Conveyance Charges	12,800
A01207- Washing Allowance	400
A01208- Dress Allowance	400
A01217- Medical Allowance.	12,000
A01233- UAA/Comp:Allowance	8,000
A0120X Adhoc Allowance 50%	20,100
A0121A Adhoc Allowance 2011	6,000
Total.	<u>137,300</u>

Muhammad Farooq
SUPERINTANT
EDU. DEPT.
Mansehra

- 2- The Expenditure involved is debitable to the Functional-cum-Object classification 09-Education Affairs and Services 091-Pre-Primary and Primary Education Affairs and Services 0911-Pre-Primary and Primary Education Affairs and Services 091102- Primary A01-Employee Related Expenses and shall be met out from within Account-IV of the District concerned.
- 3- Audit copy may be prepared and sent to this department for authentication.

Yours faithfully,

(HAYAT-UR-REHMAN)
BUDGET OFFICER-V.

Endst: No. & date as above.

Copy forwarded to: -

- 1- The Director, Elementary & Secondary Edu: Khyber Pakhtunkhwa Peshawar.
- 2- The District Coordination Officer, Mansehra.
- 3- The Executive District Officer (E&SE) Mansehra.
- 4- The Executive District Officer, (Finance & Planning) Mansehra.
- 5- The Assistant Programmer-II, HR Wing Finance Department.
- 6- Master File.

ATTESTED

A

BUDGET OFFICER-V.

23/8
3/6
2014

Handwritten notes on the left margin, including "No. 2" and "Mansehra No. 3/19".

ORDER

Amesul (E) 24

In continuation of this office order No. 5360-5384 /Estt (F)Apptt:PST (F)/2011-12 Dated Mansehra the 18th May, 2012 and on the acceptance of the appeal by the competent authority Miss: Uzm. Sarfaraz D/O Sarfaraz R/O Ghanool is hereby appointed as a Primary School Teacher **PST (Female)** against the vacant post at GGPS Badal Gran in **BPS 7 @ Rs.5800-320-5400** plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GF Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile / UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned JISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.

ATTESTED

*



P-12

~~Annex A~~ "A"

25

His/her services are liable to termination on one month prior notice from either side in case of resignation without prior notice, his/her one month pay/allowances if any shall be forfeited to Government Treasury.


9. His/her services can be terminated at any time in case his/her performance is found un-satisfactory; he/she will be proceeded against under the removal from service under E&D Rules 2011.
10. He/she should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
11. He/she may not be handed over the charge if his/her age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in pervious post, his/her entitled for pension / gratuity etc.
13. No. TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No. 830-39 /Estt: Apptt: PST//2011-12 Dated Mansehra the 21/5 2012

Copy to the:-

1. Secretary to Govt: of KPK E&S Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-7. Deputy District Officer (Female & Male) E&SE Mansehra.
8. PA to District Coordination Officer, Mansehra.
9. Budget & Accounts Officer, local office, Mansehra.
10. Candidates concerned.


EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

ATTESTED



Annexure - (F) (26) P-30
Annex - E

S#: 1 Manshra

Pers #: 00729085 Buckle:
Name: UZMA SARFRAZ
Dsg.: PRIMARY SCHOOL TEACHER
CNIC No. 1350162115998
GPF Interest Applied
12 Active Temporary

P Sec: 001 Month: May 2015
MA7044 - Dy D O (F) Prg Edu Mansehr
Min: Education Schools
NTN:
GPF #:
Old #:

PAYS AND ALLOWANCES:		MA7044
5002-Adjustment House Rent		1,306.00
5011-Adj Conveyance Allowance		2,856.00
5012-Adjustment Medical All		1,200.00
5309-Adj. 15% Adhoc Allowance		1,050.00
5898-Adj. Adhoc Allowance 50%		2,177.00
5911-Adj. Adhoc Relief 2011		653.00
5938-Adj. Adhoc Relief All 2012		1,400.00
5950-Adj: Adhoc Relief All-2014		700.00
5801-Adj Basic Pay		7,000.00
Gross Pay and Allowances		18,342.00
DEDUCTIONS:		

Subrc:

Total Deductions 0.00
18,342.00

D.O.B- 11.03.1986 LFP Quota: 4
03 Years 00 Months 000 Days ALLIED BANK LIMITED BALAKOT
2797-7

ALLIED
A

27

~~31~~
Manshra

Manshra

p Sec:001 Month:April 2015
MA7044 -Dy D O (F) Pr. Edu Mansehr
Min: Education Schools
NEN:
GPF #:
Old #:

1
Pers #: 00729085 Buckle:
Name: UZMA SARFRAZ
Dsg.: PRIMARY SCHOOL TEACHER
CNIC No. 1350162115998
GPF Interest Applied

12 Active Temporary
- PAYS AND ALLOWANCES:
5002-Adjustment House Rent
5012-Adjustment Medical All
5309-Adj. 15% Adhoc Allowance
5898-Adj. Adhoc Allowance 50%
5911-Adj. Adhoc Relief 2011
5938-Adj. Adhoc Relief All 2012
5950-Adj. Adhoc Relief All-2014
5801-Adj Basic Pay

MA7044 =
1,306.00
1,200.00
1,050.00
2,177.00
653.00
1,400.00
700.00
7,000.00
15,486.00

Gross Pay and Allowances
DEDUCTIONS:

Subrc: 100.00

4200-Professional Tax

Total Deductions 100.00
15,386.00

D.O.B
11.03.1986
02 Years 11 Months 000 Days

LFP Quota: 4
ALLIED BANK LIMITED BALAKOT
2797-7

ARRESTED

Amcees - G

28

FORMAT FOR APPOINTMENT OF POLLING PERSONNEL

(Local Government Election)

KHYBER PAKHTUNKHWA

OFFICE OF THE RETURNING OFFICER

No & Name Of District Ward: 06 No & Name of Tehsil /Town Council Ward : 06

No & Name of Village/Neighborhood Council: 24

Ref No: 11 Date: 12-05-2015

OFFICE MEMORANDUM

In pursuance of the provisions of Rule: 11 Of the Khyber Pakhtunkhwa Local Councils (Conduct Of Elections) rules 2014. The following appointment of presiding officer/assistant presiding officers /polling officer are hereby made

Polling station fro:

District/Tehsil/Town Council Ward: Govt Primary School Satbani (Female)

Number and Name of Polling Station

Village/Neighborhood Council: Sat Bani

(Number and Name of Polling Station)

To be held on the : 30-05-2015

Name & Designation Of Presiding Officer Designated As Officer		Name & Designation of Assistant Presiding Officers (@3 Per P,B)		Name & Designation Of Polling Officer (@1 per P,B)		Name If Assistant Presiding As Presiding	
1	Ambreen Saleem (SST) GGHS Balakot	1	Naseema Bibi (PST) GGPS Gulgaran	1 ✓	Uzma Sarfaraz (PST) GGPS Badal Garan	Naseema Bibi (PST) GGPS Gulgaran	
		2	Bibi Fatima (PST) GGPS Kaghan	2	Bibi Naseema (PSHT) GGPS Badal Garan		
		3	Erum Shakeel (PST) GGPS Kamai Ban	3			
		4	Bibi Shaheen (PST) Khaniyan	4			

Reserve Staff:

Place: Balakot

NOTE: Come For training on 21-05-2015 at GMS Shohal Mazhar Balakot At 08:00 am Positively

*at shohal Majar
Alian*

[Signature]
Returning Officer
Tehsil Balakot
Returning Officer For Wards
Mangrai, Sat Bani

Answer H

29

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

No 7466

Dated 12/9/2014

SHOW CAUSE NOTICE

I, Naghmah Sardar, District Education officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) rules, 2013, do hereby serve you Mst: Uzma Sarfraz D/O Sarfraz PST GGPS Badal Gran Mansehra as follows:

1) (I) You were appointed as PST at GGPS Badal Gran vide defunct Executive District Education Officer (E&SE) Mansehra Endst: No. 6830-39/Estt:Apptt: PST 2011-12 dated 31-5-2012 whereas you were stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidate for the said post through EATA. Your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25.8.2014. More over the then EDO (E&SE) has been removed from Government Service in connection with all such bogus appointment including you made by him.

2) Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defence before the inquiry committee:-

I am satisfied that you have committed the following acts/Omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- b) Inflicted huge financial losses to the Govt: Treasury receiving are result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating / cancelling the facts for un lawful appointment with coordination of then EDO.

3. As a result thereof, I as competent authority, have tentatively decided to impose upon you the major ^{penalty} of dismissal from services under rule 4 of the said rules.

4. You, are thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

6. A copy of the finding inquiry committee related page is enclosed

ATTESTED

A

Naghmah Sardar
COMPETENT AUTHORITY

9. Mst:
10. Office File.

Naghmah Sardar
DISTRICT EDUCATION OFFICER

Annex - H

Better Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7416 / _____

Dated 12/09/2014

SHOW CAUSE NOTICE

I, Naghmana Sardar, District Education Officer (Female) Mansehra Zas Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) rules, 2011, do hereby serve you Mst: Uzma Sarfraz D/o Sarfraz PST GGPS Badal Gran MANsehra as follows:

1. (1) You were appointed as PST at GGPS Badal Gran vide defunct Executive District Education Officer E & ES Manshera Endst: No. G830-39/Estt:Apptt: PST 2011-12 dated 31.05.2012 whereas you were stranger for recruitment process initiated through EATA, you ever appeared in selection process as a candidate for the said post through EATA, your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, elementary and Secondary Education Department letter No. SD (S/M)S&SED/4-17/2013 Umar Khan EDO BS-19 dated 25.08.2014. more over the then EDO (E&ES) has been removed from government service in connection with all such bogus appointment including you made by him.
2. Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defence before the inquiry committee:-

I am satisfied that you have committed the following acts/omissions specified in rules.

- a. Misconduct and dishonesty in getting bogus / faked appointment without due process of recruitment.
 - b. Inflected huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
 - c. By snatching established rights of the deserving candidates due for appointment on merit. Cheating / cancelling the facts for un lawful appointment with coorandation of then EDO.
3. As a result thereof, I as competent authority, have tentatively decided to impose upon you the major penalty of dismissal from service under rule 4 of the said rules.
 4. You are thereof required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be head in person.
 5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.
 6. A copy of the finding inquiry committee related page is enclosed.

2394/9-10-20-14

Annex -

(I)

(30)

To

The District Education Officer (Female)
District Mansehra

Subject:

DEFENCE REPLY IN RESPECT OF MRS. UZMA
SARFRAZ PST, GGPS BADAL GRAN MANSEHRA

Reference:

SHOW CAUSE LETTER NO: 7416 DATED 12-09-2014
FROM THE OFFICE OF DEO(F) MANSEHRA

Respected Madam:-

It is humbly requested that I received your letter number and subjected mentioned above. In this regard I want to submit my few points, which may add something new in your kind information and it may also correct your office record. The most important point is that, there are few allegations charged against me. I solemnly declare that all of these allegations are baseless and totally wrong. I strongly reject these allegations. the detailed defence reply point to point is as under.

1. I have applied and processed through proper and prescribed way of recruitment i.e through EATA tests. There is a technical mistake, I was included in the merit list of union council Ghari Habibullah instead of U/C Ghanool Balakot Mansehra.
 - a. Basically I was a resident of U/C Ghari Habib Ullah, But due to my marriage, which took place in the month of ~~April~~ ^{April} 2007, I was shifted to U/C Ghanool.
 - b. At the time of document submission (Registration). I have submitted the relevant documents i.e Nikah Nama+ CNIC with my husband + Union Council Certificate, (All these documents clearly shows that my new union council is U/C Ghanool but due to official negligence I was still accorded in the merit list of Ghari Habib Ullah.
 - c. While the mind lowering fact is that I achieved the score of 48-27, if your sub ordinate staff have not shown their professional negligence, I would be the toper of my U/C. so, I am the suffer. Please tell me, why not, I initiate a struggle for my right as your office badly discriminate me.
 - d. Photocopy of all these documents are attached herewith for your kind consideration.

Received on 30/9/14
[Signature]

ATTESTED

[Signature]

2. I am not in a position to say something about your findings and reports of inquiry committee, but I have something to say in response of your sub points under point No 02.
 - a. There is no misconduct ion and dishonesty on my behalf what so ever the circumstances are, as I have explain my position in point no. 01.
 - b. I am absolutely not involved in my financial loss to the Govt. Treasury as I had followed all the prescribed method of recruitment.
 - c. As I have appointed through proper channel, hence I had never snatch any established rights of any deserving candidate. My all supporting documents are annexed here with for your ready reference.
3. Above mentioned facts are good enough to reconsider your decision /uphold the decision regarding imposing of major penalty.
4. I request you that please consider my defense reply in this regard and allow me to explain my position in court of you in the form of personal hearing.

MOST IMPORTANT:

1. Honorable High Court Bench Abbottabad has already given his verdict of pay release in my favor in the some case vide writ petition 930-A/2013 (Decision copy is annexed here)
2. The case is already under the prosecution of honorable High Court Peshawar Abbottabad Bench.

Therefore, it is humbly requested that Kindly reconsider the case, 1st in the light of above mentioned facts, 2nd please let it decide by the honorable court.

I shall be thankful to you for your kind consideration.

Thanks.

ATTESTED



Truly yours

Uzma Sarfraz
Uzma Sarfraz
PST, GGPS
Badai Granai

Uzma Sarfraz
20-09-14

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER, (FEMALE) MANSEHRA

ADJUSTMENT

As approved by the competent authority, the following Teachers as proposed by the ASDEO (Female) circle concerned are hereby adjusted at the station as mentioned below against their name to facilitate on humanitarian grounds on their own pay and grade in the interest of public service/Teachers with effect from their taking over charge.

S#	Name of Teacher	From (GGPS)	To (GGPS)	Remarks
1	Aisha Yousaf, SPST	Devel	CMS Choian	Against V/Post
2	Abida, PST	Kayian Mathal	Charr	Against V/Post
3	Nazia Bibi, SPST	Pudnail	Mari Safdar Shah	Against V/Post
4	Syeda Nuzhat, SPST	Chambati	Charrian	Against V/Post
5	Rani Gu, PST	Lami	Chinarkote	Against V/Post
6	Hamida Begum, PST	Seri Subedar	Charrian Battal	Against V/Post
7	Musarat, SPST	Karkala	Fazal Abad	Against V/Post
8	Hajra Jamil, PST	Lassan Nawab	Palsala	Against V/Post
9	Somia	Bandi Badhan	Maira Hajam	Against V/Post
10	Naheeda Naeem	Gara Kawai	Pairan Mansehra	Against V/Post
11	Uzma Sarfaraz	Badal Gran	Bangian	Against V/Post
12	Nusrat	Kotly Bala	Ichrian	Against V/Post
13	Sameena Gulab	Pudnial	Afzal Afad	Against V/Post
14	Saeeda Naz	Chitti Mohri	Madsarian	Against V/Post

Note:- 1. Charge Report should be submitted to all concerned.
2. No TA/DA allowed.

Sd/-

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst: No. 475-80 / Adjustment Need basis,

Dated Mansehra the 23/01/2015

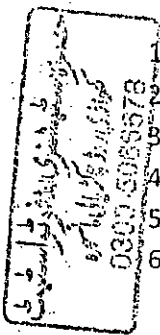
Copy to:-

1. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer, Mansehra.
3. The District Education Officer (Female) Mansehra.
4. All ASDEOs (Female) Circle Concerned.
5. Teachers Concerned.
6. Office File.

SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA.

ATTESTED

K



ریجنل ایجوکیشن آفیسر

Endstt NO

میں مسماة عظمیٰ سرفراز آرڈر نمبر 47580

DEO قلمبند

ماترہ کھانہ سے کیے گئے آرڈر کی مطابق آج

مورخہ 26-01-2015 کو گورنمنٹ گزٹ ڈرامی سکول مدراس میں

سے بعد از دوپہر ایڈووکیٹ کی جہی

لینا کالی SDEO اینڈ DEO آفس ماترہ کو ارسال

ہے

عصمت عظمیٰ سرفراز PST GGS مدراس

دستخط سید اختر - GGS مدراس

N Seema

Head Teacher
G.G.P.S Badal Gran
Munoor Circle Kaghan
Balakot Dist. Muzaffargarh

26/01/2015

ATTESTED
A

Arrival Report

آفس
مسماة صفی سرفراز P.S.T. B.P.S. 12 آرڈر نمبر 475-80 Endst
23.1.2015

کے تحت گورنمنٹ گرلز ہیرالڈی سکول بدنگراں (سٹور) سے گورنمنٹ
گرلز ہیرالڈی سکول بھنگیاں میں آکر اپنی پوسٹ کا چارج
سنبھال لیا ہے

اطلائیہ رپورٹ ارسال خدمت ہے

صفی سرفراز
@malik

ڈپٹی چیف ایگزیکٹو آفیسر
گورنمنٹ گرلز ہیرالڈی سکول بھنگیاں

Government
P.S. Bhangan
District Jhang

ATTESTED

A

Annexure 12

Better Copy

OFFICE OF THE DISTRICT EDUCATIONS OFFICER (FEMALE) MANSEHRA
NOTIFICATION

1. Whereas Mst: Uzma Sarraz D/o Sarfraz working as PST/GGHS/GGMS/GGP Badal Gran was served with show cause notice and was proceeded under the Khyber Pakhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her show cause notice.
2. And whereas the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex-executive District Officer Elementary and Secondary Education MANsehra.
 - i. Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pakhtunkhwa, Peshawar)Now. Secretary Zakat Usheqr and Social Welfare Department.
 - ii. Mr. Akhalhaq Baig, Principal BS-20 RITE Male haripur.
3. And whereas the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
4. And whereas District Education Officer (Female) in the capacity of competent Authority after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to show cause notices, of the view that the charges against you have been proved.
5. Now, thereof, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) revised rules 2011 the District Education Officer (Female) Mansehra in the capacity of competent Authority is pleased to impose major penalty of Dismissal from govt service upon Mst: Uzma Sarfraz D/o Sarfraz CT/PETITIONER/TT PST GGHS/GGM GGPS Badal Gran

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Uzma Sarfraz D/O Sarfraz working as PSI GGHS/GGMS/GGP Badalgran was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Manshira.
- i) Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
- ii) Mr. Akhailaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011: the District Education Officer, (Female) Manshira, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Uzma Sarfraz D/O Sarfraz CT/PET/TT PSI GGHS/GGM GGPS Badalgran.

[Handwritten Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1916-25 /AE- /Estab: dated 03/03 /2015.

Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Manshira
4. District Monitoring Officer Manshira.
5. Deputy Commissioner Manshira.
6. Principal/Headmistress _____
7. SDEO (F) Manshira.
8. Budget and Accounts Officer Local Office
9. Mst: _____
10. Office File.

[Handwritten Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

ATTESTED

[Handwritten Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

MUTUAL TRANSFER.

Exchange of Posts between the following PST Teachers are hereby ordered on their own pay and grade in the best interest of public service with immediate effect.

S.No.	Name of Teacher	From	To	Remarks.
1.	Uzma Shoaib PST	GGPS Bhangian	GGPS Loonr	Vice S.No.2
2.	Gulshan Bibi PST	GGPS Loonr	GGPS Bhangian	Vive S.No.1
3.	Saeeda Begum PST	GGPS Mohayan Khori	GGPS Jandrana	Vice S.No.4
4.	Zahida Begum PST	GGPS Jandrana	GGPS Mohayan Khori	Vice S.No.3
5.	Shazia Bibi PST	GGPS Nanoha Dakhan	GGPS Shahlia	Vice S.No.6
6.	Shaheen Bibi PST	GGPS Shahlia	GGPS Nanoha Dakhan	Vice S.No.5

Note

- 5. Charge report should be submitted to all concerned.
- 6. No. TA/DA is allowed to anyone.

Sd/-
District Education Officer
(Female) Mansehra

Endst: No. 1016-08 /Dated Mansehra the 06/03/ /2015

Copy to the:-

- 01. District Account Officer Mansehra.
- 02. SDEO (Female) Mansehra.
- 03. ASDEO (Female) Concerned.
- 04. Head Teachers School Concerned.
- 05. Teacher Concerned. Office order file.

[Signature]
District Education Officer
(Female) Mansehra

Attested
[Signature]

ATTESTED
[Signature]

حاضری ازبورت

مسماة عظمیٰ دستگیر آئی ایس ایس نے آفس آرڈر
 نمبر 18-14 سیریل نمبر تاریخ 06-03-015 امریکہ از دفتر
 ڈسٹرکٹ ایکویٹیشن آفسیر زمانہ سارا سپرہ کے تحت آئی
 مورم 07-03-015 کو کورڈر از ڈویژن گورنمنٹ گرنرز
 پرائمری اسکول لوزنڈ میں حاضری کر دی ہے۔ ازبورت
 اریب الی

ادنیٰ ڈویژن آفس لوزنڈ

کاپی برائے ایس۔ ایس۔ ڈی۔ ایس۔ ایس۔

کاپی برائے ڈی۔ ای۔ ای۔ اور زمانہ

کاپی برائے آفیسر آفس سپرہ

Talwar
Head Teacher
Govt. Girls Primary School
Lodhran

RECEIVED

*

ARRESTED



07/11/2014. (Copy attached)

VII.

Meanwhile a pay release order was also issued vide Endstt No 9078-84 dated

VI.

show cause and submission of its reply. (Copy attached)

Bhangrian vide Endstt No 475-80 dated 23/01/2015 quite for issuance of the

This is worth mentioning to submit the Appealant was transferred to GGS

V.

(Copy attached)

The appellant submitted the reply on 30/09/2014 explaining the factual position

attached)

the result of misuse of authority by the then BDO(D&SE) Manshehra. (Copy

12/09/2014. Endstt: No 7618-19 stating that "the appellant received appointment order was

last more than two years. Meanwhile the appellant received a show cause notice on

IV. That the appellant continuously performing her duties without any break for the

ours. (Copy of the said policy is attached).

Mohandri under the adjacent union. Policy as there was no post being vacant in

appellant was appointed as the PST GGS Badal Gram Manoor Union Council

III.

EDO E&SE Manshehra conducted the interviews scrutinized the documents and the

Manshehra obtaining 136 Marks with 45.33 percentage not merit was 48.27

the test and a candidate under ETBA on 22/06/2011 through Roll No. 1701771 at

II.

That as per procedure the Appellant applied for the post of PST and appeared in

daily Aaj Abbottabad on 20-05-2011. (Copy attached herewith).

teachers in various cadres district Manshehra through advertisement published in

I.

That the then BDO (E&SE) Manshehra invited applications for recruitment of

(F) Manshehra.

connections to colorful exercise of power on the part of authority i.e. BDO

I would like to invite your kind attention to the following facts in

Respected Sir!

appellant with all back benefits.

Prayer :

contradictory to the recruitment policy & rules and re-instate the

date of its issuance declaring the same without lawful authority

Captioned impugned notification may please be sent aside from the

impugned notified is attached & marked as annex.

Subject:-

highly capricious/whimsical manner without lawful authority / copy of

of dismissal from Govt. service was imposed upon the appellant in a

Endstt No. 1916-25/A/E/Estab: dated 03/03/2015 whereby major penalty

Department Appeal against the impugned notification issued under

KPK Peshawar.

The Director Elementary & Secondary Education

To

38

Answer = M

- VIII. The appellant received the impugned order on 03/03/2015 whereas major penalty of dismissal from the services has been imposed upon the appellant.
- IX. A strange thing also happened that soon after the dismissal order the DEO(F) Office Mansehra issued a mutual transfer order of the appellant to the GGPS Loonr under Endstt No. 1041-18 dated 6/3/2015. Owing to this order the appellant has been relieved off from his services from the GGPS Bhangian and has made arrival at GGPS Loonr where the appellant is still performing considering the latest order of mutual transfers as a valid one.
- X. No enquiry was conducted or initiated. No opportunity of defense was offered, no personal hearing was made by competent authority. How the authority passed the order in the light of E&D rules and under what charges / evidences imposed such a harsh punishment of dismissal from the services?
- XI. That the enquiry regarding the illegal appointment was made against the then EDO who made appointment orders in piece meal of candidates who were really strangers for recruitment process. However appointment order of the appellant was passed after the completion of due process of recruitment.
- XII. It is further added that no such recommendations were made by the enquiry committee which was constituted to conduct inquiry against the then EDO (Copy attached)

In the light of above facts you are therefore requested to set aside the impugned notification of **dismissal from services** which are without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits.

Hopefully you will consider the matter on humanitarian grounds and take favourable n/a please.

Yours sincerely

Uzama Sarfraz 19/3-2015
Uzama Sarfraz

WITNESSED

A

PST GGPS Badal Graan
Currently working at GGPS Loonr

(40) (3)

Annexure - M1

P-40

LEOPARDS COURIER SERVICES PVT. LTD.

57841447

12

From:		To:		Piccos	
To:		From:		Weight	
CASH		NO. OF DECLARATIONS		DATE	
TIME		SIG.		Price Inclusive of G.S.T. 12-00-5806-001-91	

Leopards Accepted Above Mentioned Items on Shipper's
 Note & Shipper Agreed All the Conditions Printed on Reverse
 Leopard Courier
 Leopard Courier
 Leopard Courier

For Suggestions/Complaints Contact info@leopardscourier.com
 Please Send Gifts To Your Loved One's By Leopard's LoveRite
 www.leopardscourier.com

ATTESTED

[Handwritten Signature]

(41)

Amreux - N^o

U/C

(9)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst Uzma Sarfaraz, PST at Government Girls Primary School Badal Gran District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1916-25 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Originally She belongs to U/C Garhi Habibullah and was married in U/C Ghanool where no post was lying vacant. Hence her appointment is out of merit. She was appointed at GGPS Badal Gran U/C Mohandri vide a continuation order Endst. No. 6830-39 dated 31/05/2012, where only one post lying vacant against which Bibi Naseema D/O Muhammad Nabi occurring at S.No.1 of the merit in respective U/C was appointed. Only one post was lying vacant at the time of advertisement i.e. 20/5/2011. The claim made by the applicant regarding the claim made by the applicant regarding the existence of 02 vacancies of PST in her U/C is not valid as these have been sanctioned later on 01/04/2012.
2. Appeal may be rejected with the remarks that she was appointed out of merit.

NOW, THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Mansehra vide order No. 1916-25 dated 03/03/2015 is hereby converted into removal from service.


Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4325-29 /F.No. 79 /Appeals Female MSR Dated Peshawar the 28/8 /2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Sub Divisional Education Officer (Female) Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

ATTESTED


Deputy Director (Female)
Directorate E&SE, KP

Next Date 20/4-016
Abbottabad

Amex uae - 01

42

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

In the matter of
Appeal No. 745 /2015

Uzma Sarfraz (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through Secretary
Education, Peshawar and others.....
(Respondents)

**Application for permission for filling amended
appeal in view of the Modification in the final
order i.e conversion of penalty from dismissal
to removal from service vide order dated
25.08.2015.**

Respectfully Submitted:

1. That the above noted appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 21.01.2016, at Camp Court Abbottabad.
2. That the appellant request for allowing necessary amendment in the following manner inter alia on the following grounds:-

Grounds of Application

- A. That the appellant has in the titled appeal challenged the order dated 03.03.2015, vide which she has been disraissed from service. Before approaching the Honorable Tribunal, the appellant also submitted the mandatory departmental appeal on 19.03.2015, however the same was not responded till 90 days, hence the appellant filed the titled appeal.


ATTESTED

[Signature]

43

- B. That now during the pendency of the titled appeal the Appellate authority has issued notification dated 25.08.2015, whereby the departmental appeal of the appellant has been rejected, however her Penalty order issued by the DEO Female, Mansehra vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. *(Copy of the order dated 25.08.2015, is attached)*
- C. That in light of the said modification and to avoid future complications, it is necessary to amend the titled appeal to the extent of challenging the order dated 25.8.2015.
- D. That there is no legal impleadment in allowing such permission, rather the interest of justice would best be served.

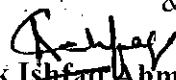
It is, therefore, humbly prayed that on acceptance of the instant application the appellant may please be allowed to file amended appeal in view of the issuance of final order whereby the penalty of dismissal from service was converted to removal from service vide order dated 25.08.2015.

Appellant 

Through

Abdul Saboor Khan

&


Malik Ishfaq Ahmad Jilani
(Advocates, High Court)

Affidavit

I do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal

Dated: ___/11/2015

Deponent

ATTESTED

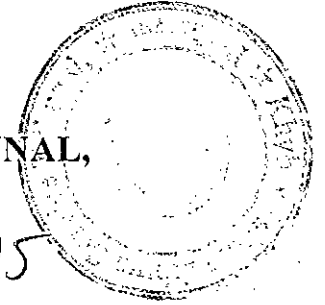


(44)

Amexur - O₁

~~P~~

BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR



Appeal No. 745/2015

Mst. Uzma Sarfraz daughter of Sarfraz Ahmed
resident of Josacha, Tehsil Balakot District
Mansehra, Ex-PST Government Girls Primary
School Badal Garan, Tehsil Balakot District
MansehraAppellant

A.W.F. Province
Service Tribunal

Diary No. 769

Dated 6-7-20

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Peshawar.
2. Director Education Department, Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE) Education Mansehra.
4. District Accounts Officer, Mansehra
.....Respondents:

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
ORDER ENDST NO.1916-25/AE/ESTAB
DATED 03.03.2015 VIDE WHICH THE
APPELLANT WAS DISMISSED FROM
SERVICE.**

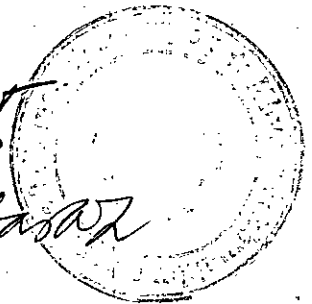
PRAYER: -

On acceptance of instant appeal, the
impugned order dated 03.03.2015 may
please be set aside and the appellant
may graciously be re-instated in service
with all back benefits.

~~The order~~
~~is~~
~~annulled~~
6/7/2015
ATTESTED

KPK Service Tribunal,
Peshawar

A. No. 745/2015
MST. Uzma Sarfraz



20.04.2016

Counsel for the appelland and Mr. Muhammad Usman, Senior Clerk alongwith Muhammad Siddique, Sr.GP for the respondents present. Reply to application not submitted. Arguments on application heard and record perused.

Appellant is seeking amendment in the service appeal as departmental appeal of the appelland dated 19.3.2015 was not decided at the time of filing of appeal which was decided thereafter on 25.08.2015. Learned counsel for the appelland intends to impugn the same by amending the appeal.

Since the departmental appeal of the appelland has been decided after filing of the service appeal and the appelland intends to impugn the same as well, as such the application is allowed and appelland shall therefore submit amended appeal in office within two weeks which shall be placed before this court (S.B) after scrutiny by the Registrar, on 19.05.2016 at camp court, Abbottabad.

sd/-
Chairman
Camp Court
Abbabad

Certified true copy
Khyber Pakhtunkhwa
Services Tribunal,
Peshawar

ATTESTED

[Signature]

Date of ... 26-04-2016
Number of ... 800
... 6 ...
... 2 ...
... 8 ...
Date ... 26-04-2016
Date ... 26-04-2016

BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR

Appeal No. 745/2015
Mst. Uzma Sarfraz.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar etc.....Respondents

SERVICE APPEAL

INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of service appeal alongwith affidavit.	1-9
2	Application for status-quo.	10-11
3	Correct addresses of the parties.	12
4	Copies of educational record.	"A"	13-23
5	Copy of the advertisement.	"B"	24
6	Copies of E.T.A Test result.	"C"	25
7	Copy of the appointment and <i>Endorsement Register</i>	"D"	26-29
8	Copy of the Pay Roll.	"E"	30-31
9	Copy of the show cause notice. <i>& Reply</i>	"F"	32-36
10	Copy of the impugned order dated 03.03.2015.	"G"	37
11	Copy of the departmental appeal.	"H"	38-39
12	Copy of the receipt.	"I"	40
13	Copy of the letter of election duty.	"J"	41
14	Copy of the order dated 23.01.2015.	"K"	42
15	Copy of the order dated 06.03.2015.	"L"	43-44
16	Wakalat Nama.	45

Dated 01.07.2015

Uzma Sarfraz
Mst. Uzma Sarfraz
...Appellant

Through

Abdul Saboor Khan
ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.

P. 1

**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Appeal No. 745/2015

Mst. Uzma Sarfraz daughter of Sarfraz Ahmed
resident of Josacha, Tehsil Balakot District
Mansehra, Ex-PST Government Girls Primary
School Badal Garan, Tehsil Balakot District
MansehraAppellant

**K.P. Province
Service Tribunal**

Diary No. 769

Dated 6-7-2015

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar.
2. Director Education Department, Khyber
Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE)
Education Mansehra.
4. District Accounts Officer, Mansehra
.....Respondents.

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974, AGAINST THE
ORDER ENDST NO.1916-25/AE/ESTAB
DATED 03.03.2015 VIDE WHICH THE
APPELLANT WAS DISMISSED FROM
SERVICE.**

PRAYER: -

On acceptance of instant appeal, the
impugned order dated 03.03.2015 may
please be set aside and the appellant
may graciously be re-instated in service
with all back benefits.

Filed to the
Registrar
6/7/2015

Respectfully Sheweth!

1. That, the appellant is resident of Josacha, Tehsil Balakot District Mansehra.

2. That the appellant is fully qualified and having the required documents/certificates.

(Copies of educational record are annexed as annexure "A").

3. That, the District Education Officer, Mansehra/respondent No.3 advertised some vacancies in Daily ~~Mashriq~~.

(Copy of the advertisement is annexed as annexure "B").

4. That, as per procedure, the appellant applied for the post of PST being a qualified teacher having required qualification. E.T.A test was conducted on 26.02.2011 and the appellant appeared as a candidate and obtained 136 marks out of 300 under roll No.1701771.

(Copies of E.T.A Test result is annexed as annexure "C").

5. That, the then E.D.O conducted interview and scrutinize the documents

of the candidates, and merit list of the candidates was displayed for receiving objections. After due official process, the meeting of D.S.C was held and approved the case of PST candidates for appointment against the vacant post of PST and the appointment order of the appellant was issued under Endst. No.6830-39/Estt: Apptt: PST/2011-12 dated 31.05.2012 and the appellant was posted at GGPS Badal Garan and later on transferred and adjusted to different schools.

*(Copy of the appointment and ~~Endorsement~~
Registers are annexed as annexure "D").*

6. That, the appellant performed her duties very honestly, regularly and fairly since the time of her appointment in above-mentioned different schools and also received her salaries ~~December 2014 to~~
May, 2015.

(Copy of the Pay Roll is annexed as annexure "E").

7. That, the appellant was continuously performing her duties without any break for the period for which the salaries were received and has never been found guilty of any kind of absenteeism, truancy, misconduct, misfeasance, malfeasance or nonfeasance, nor been

found guilty of dereliction of duty. Without taking these things into consideration, the respondent No.3 issued show-cause notice to the appellant levelling baseless allegations against the appellant therein.

(Copy of the show cause notice is annexed as annexure "F").

8. That, reply to the notice was submitted.
9. That, the appellant appointment was terminated through impugned dismissal order dated 03.03.2015 by imposing major penalty of dismissal from service.

(Copy of the impugned order dated 03.03.2015 is annexed as annexure "G").

10. That, being aggrieved from the impugned dismissal order, the appellant preferred departmental appeal before the Director (Elementary & Secondary) Education Peshawar but of no avail.

(Copy of the departmental appeal and receipt thereof are annexed as annexure "H & I").

11. That, the appellant was also directed to perform election duty during the local election of 2015.

(Copy of the letter of election duty is annexed as annexure "J").

12. That, on 23.01.2015, after the show cause order having been passed, another adjustment order was passed on 23.01.2015 in which the appellant was adjusted to Bangian form Badal Garan. Similarly after dismissal, mutual transfer order of the appellant was passed vide which the appellant was transferred from Bangian to Loon on dated 06.03.2015.

(Copy of the orders dated 23.01.2015 & 06.03.2015 are annexed as annexure "K&L").

13. That, the appellant being aggrieved from the impugned order, seeks the gracious indulgence of this Honourable Court/tribunal, inter alia, on the following amongst the other grounds: -

GROUND

- i. That, the impugned order dated 03.03.2015 is wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, without lawful authority, based on malafide, un-constitutional

and against the relevant rules and regulations hence not maintainable and liable to be set aside.

- ii. That, the services of the appellant were terminated on the fact that the appellant's appointment was the result of misuse of the authority by the then E.D.O Mr. Umer Khan; such fact cannot legally be made base for removal from the service and same is the case of appellant. The appellant legally, as per the principle of natural justice, as per the rule of good governance and in the light of her fundamental rights guaranteed in the constitution could not have been penalized with major penalty for act, howsoever, illegal, unjustified and without jurisdiction of the then E.D.O Mr. Umer Khan.
- iii. That, perusal of first para of impugned show cause notice is self explanatory and worth considering for reinstatement of the services of the appellant.
- iv. That, there is no case of ill-gotten means against the appellant and section-20 of General Clauses Act is not applicable to the case of the appellant because appellant has not been found guilty of any misconduct or

procuring her services through any fraudulent means.

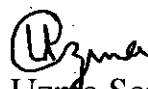
- v. That, in the light of authoritative decisions/view of the superior judiciary including the Supreme Court of Pakistan, the services of the appellant could not have been terminated and the impugned order/notification could not have been issued because where the authority is guilty of irregularities, illegalities and procedural violations, the services of an employee cannot be terminated.
- vi. That, no opportunity of personal hearing has been given to the appellant and her services have been struck through a single stroke of pen. Thus the impugned order is also against the principal of natural justice that no one should be condemned unheard.
- vii. That, there is allegation in the show-cause notice that the appellant never appeared in the selection process of the candidates and her name did not fall in the merit list prepared for the selection of candidates. This fact is belied from the merit list annexed herewith, reply submitted in the Honourable High Court in response to C.O.C filed by the present appellant therein.

viii. That, the respondent No.3 is the occupier of dual post of D.E.O and S.D.E.O Mansehra and have passed first the dismissal order and then the adjustment order in which the appellant was adjusted from Badal Garan to Bangian after having been purportedly dismissed from the service by the same officer by the respondent No.3. This fact speaks volumes about the modus operandi and modus vivandi and negligence with which the respondent No.3 has played with the services of the appellant and the same fact is against the all norms, rules, laws of administration, procedure and good governance.


PRAYER: -

It is, therefore, most humbly prayed that on acceptance of instant appeal, the impugned order dated 03.03.2015 passed by the respondent No.3 may please be set aside and the appellant may graciously be re-instated in service with all back benefits.

Dated 01.07.2015


Mst. Uzma Sarfraz
.....Appellant

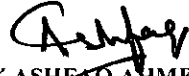
Through


ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.

AFFIDAVIT


I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this appeal are true and correct to the best of my knowledge and belief as per information furnished by my client and nothing has been concealed from this Honourable Court.

Dated 01.07.2015



MALIK ASHFAQ AHMED JILANI,
Advocate High court,
Mansehra.

06 JUL 2015



**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Mst. Uzma Sarfraz.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar etc.....Respondents

SERVICE APPEAL


**APPLICATION FOR SUSPENSION OF
OPERATION OF IMPUGNED ORDER
DATED 03.03.2015 TILL THE DISPOSAL
OF ABOVE-TITLED APPEAL.**

Respectfully Sheweth!


1. That, this application may please be considered as part and parcel of main appeal.
2. That, the appellant have a prima facie case and there is every hope of its success.
3. That, the balance of convenience also tilts in favour of the appellant.
4. That, if the operation of the impugned order dated 03.03.2015 has not been suspended then the appellant would suffer an irreparable loss and purpose of above appeal would become infructuous.

It is, therefore, most humbly requested that the operation of the impugned order dated 03.03.2015 may please be suspended till the disposal of main appeal.

Dated 01.07.2015


Mst. Uzma Sarfraz
...Appellant

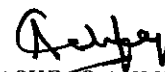
Through


ABDUL SABOOR KHAN,
MALIK ASHFAQ AHMED JILANI,
Advocates High court,
Mansehra.

AFFIDAVIT

I, Malik Ashfaq Ahmed Jilani, Advocate High Court, Mansehra, counsel for the appellant, do hereby solemnly affirm and declare on oath that the contents of this application as per information furnished by my client are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 01.07.2015


MALIK ASHFAQ AHMED JILANI,
Advocate High court,
Mansehra.

06 JUL 2015



**BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR**

Mst. Uzma Sarfraz.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar etc.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES


APPELLANT

Mst. Uzma Sarfraz daughter of Sarfraz Ahmed
resident of Josacha, Tehsil Balakot District
Mansehra, Ex-PST Government Girls Primary
School Badal Garan, Tehsil Balakot District
Mansehra.

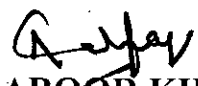
RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa through Secretary
Education, Peshawar.
2. Director Education Department, Khyber
Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE)
Education Mansehra.
4. District Accounts Officer, Mansehra.

Dated 01.07.2015


Mst. Uzma Sarfraz
...Appellant

Through


**ABDUL SABOOR KHAN,
MALIK ASHEAQ AHMED JILANI,
Advocates High court,
Mansehra.**

Alama Iqbal Open University
Islamabad

P-13 Member

A.W.K.A



Serial No. 199172

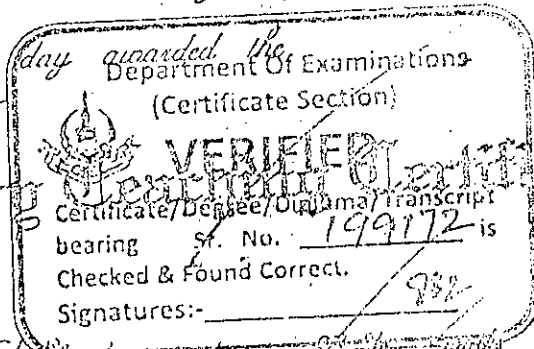
Certified that M_r/M_s
Son/Daughter of
Registration No.
Semester

UZMA SARFARAZ
SARFARAZ AHMAD

07-NMA-1853 Roll No Z-656027

SPRING 2008 having met all the requirements under

the semester system is this day awarded the



Primary Certificate

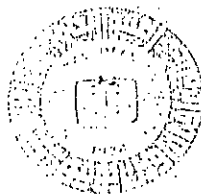
He/She has secured

and has been placed in

B grade

Assistant Controller of Examinations
Certificate Section
Alama Iqbal Open University
Islamabad

Attested
Amjad
Atta-ur-Rahman Amjad
Subject Specialist
GHSS Kareri Mansehra



Result declared on: March 14, 2009

Date of issue: February 28, 2011

Attested
Amjad
Controller of Examinations

Note: This certificate is issued without alteration/erasure
The detail of courses is overlaid.

P-14

ADA No: 125755

Roll No: 56375

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan

SECONDARY SCHOOL EXAMINATION CERTIFICATE

SESSION ANNUAL 2003

This is to certify that UZMA SARFARAZ

Son/Daughter of SARFARAZ AHMAD

A candidate from GOVT. GIRLS HIGH SCHOOL GARHI HABIBULLAH MANSEHRA has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in March 2003 as a Regular/Private Candidate. He/She obtained 501 marks out of 850 and has been placed in Grade C Representing GOOD.

The candidate passed in the following subjects:

- | | | | |
|------------|---------------|-----------------|----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS | 6. G. SCIENCE | 7. ISL: STUDIES | 8. EHE |

Date of Birth according to admission form is ELEVENTH MARCH

One Thousand Nine Hundred and EIGHTY-SIX (11-03-1986)

[Signature]
Asstt. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure.

Attended
[Signature]

P-15

Sr. No. AB35

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD
DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination

(Class X)

Session 2003 (Annual)

Group (HUMANITIES GROUP)



Name: Uzma Sarfaraz

Father's Name: Sarfaraz Ahmad

Roll No 56375

Subjects	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In Words
1. English	150	50	47	97	Ninety-Seven
2. Urdu	150	39	56	95	Ninety-Five
3. Islamiyat	75	53		53	Fifty-Three
4. Pakistan Study	75	46		46	Forty-Six
5. New Riazi	100	33		33	Thirty-Three
6. General Science	100	50		50	Fifty Only
7. Islamic Study	100	70		70	Seventy Only
8. Elements Of Home Economic	100	57		57	Fifty-Seven

Total 850

501-C Five Hundred One Only

Checked By: _____

Remarks

Date: 25-06-2003

Note: Errors / Omissions are excepted

Khaksar and BRAINS Software Enterprise (KBSoft)

Controller of Examinations
BISE Abbottabad

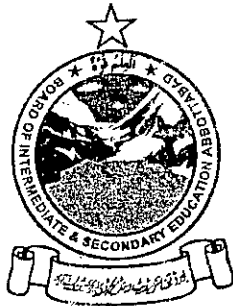
Atta-ur-Rahman Anjild
Subject Specialist
GHSS Karim Mansetra

Attested
Rafiq

ADA No. 060050

Roll No. 42982

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan

HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2006

Humanities Group

This is to certify that UZMA SARFRAZ

Daughter of SARFRAZ AHMED

A candidate from PPC GGHSS GARI HABIB ULLAH MANSEHRA

has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in May 2006 as a Regular Candidate. She has obtained 692 marks out of 1100 and has been placed in Grade B Representing VERY GOOD.

The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

1. ENGLISH

2. URDU

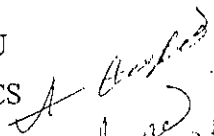
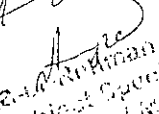
3. ISL. EDU-PAK STUDIES

4. ISLAMIC HISTORY

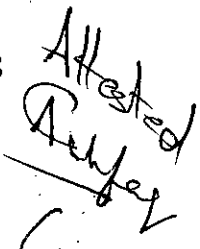
5. CIVICS

6. ISLAMIC STUDIES


Asstt. Secretary


Attest: 
Subject Specialist
CMSC Abbottabad

This certificate is issued without alteration or erasure.


Secretary

39122

Certificate No: _____

P-17

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

Roll No: 10087

Group: HUMANITIES

RESULT CARD
HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Part - I

Session: 2005 (Annual)

Name: UZMA SARFARAZ
 Father Name: SARFARAZ AHMED
 Reg No: 0044182016
 Institution/
 District: PPC GGHSS GARI HABIB ULLAH
MANSEHRA

Attested
Rahman

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-I held in the month of May/June as a Regular Candidate

Subjects	Marks	Marks Obtained			
		Theory	Pract	Total	Marks in Words
English	100	53		53	Fifty-Three
Urdu (Comp)	100	64		64	Sixty-Four
Islamic Education	50	38		38	Thirty-Eight
Islamic History	100	52		52	Fifty-Two
Civics	100	43		43	Forty-Three
Islamic Studies	100	71		71	Seventy-One
Total : 550				321	Three Hundred Twenty-One Only
Remarks :					

Attested
Rahman
 Ta-ur Rahman Ahmad
 Subject Specialist
 GHSS Karori Manshra

Date : 11-August, 2005

Checked By: _____

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc. must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad.
 Visit us: www.biseatd.edu.pk

[Signature]
 Controller of Examinations

P-18

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Certificate No: 206042982

Roll No: 42982

Group: HUMANITIES

DETAILED MARKS CERTIFICATE
HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

Part - II
Session: 2006 (Annual)

Name: UZMA SARFARAZ
Father Name: SARFARAZ AHMED
Institution: PPC GGHSS GARI HABIB ULLAH MANSEHRA
District:

*Attended
Regular*

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May / June as a Regular Candidate

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract.	Theory	Pract.		
English	200	53	--	69	--	122	One Hundred Twenty-Two
Urdu (Comp)	200	64	--	67	--	131	One Hundred Thirty-One
Islamic Education	50	38	--	--	--	38	Thirty-Eight
Pakistan Studies	50	--	--	43	--	43	Forty-Three
Islamic History	200	52	--	60	--	112	One Hundred Twelve
Civics	200	43	--	70	--	113	One Hundred Thirteen
Islamic Studies	200	71	--	62	--	133	One Hundred Thirty-Three
Total: 1100						692	Six Hundred Ninety Two Only

Remarks:

Date: 05-August, 2006

Checked By: [Signature]

A. Usman
Principal
Gari Habib Ullah Mansehra

[Signature]
Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

Certificate No: 12813807

P-19

HAZARA UNIVERSITY, MANSEHRA N.W.F.P, PAKISTAN

DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2007

Part - I



Name: UZMA SARFRAZ
Father Name: SARFARAZ AHMAD
Institution/
District: MANSEHRA

Roll No: 28138
Reg: No: 0092MAFPX-BA7

Course Name	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
English	75		25	--	25	Twenty-Five	
Urdu	75		41	--	41	Forty-One	
Islamiyat	60		35	--	35	Thirty-Five	
Islamic Studies	75		31	--	31	Thirty-One	
Total : 285					132	One Hundred Thirty-Two Only	

Checked By : _____

[Signature]

A. Hestad

Subject Specialist
CHSS Karori Mansehra

[Signature]

Controller of Examinations

Hazara University, Mansehra
September 26, 2007

Prepared in: Computer Section Hazara University.

Note: Errors / Omissions excepted with in 30 days of issuance date of this Certificate.

Attested
Raif

P-20



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SN: 19491

DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2009

Roll No: 42724

Reg No: 0992BAEPX-BA7

Name: Uzma Sarfraz

F/ Name: Muhammad Sarfraz

Institution/ District: MANSEHRA

Part: Second

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks	285				132	ONE HUNDRED THIRTY-TWO	
ENGLISH	75		24		24	TWENTY-FOUR	Pass
URDU	75		42		42	FORTY-TWO	Pass
PAKISTAN STUDIES	40		27		27	TWENTY-SEVEN	Pass
ISLAMIC STUDIES	75		42		42	FORTY-TWO	Pass
Total:	550				267	TWO HUNDRED SIXTY-SEVEN	

Percentage: 48.55
Division: SECOND



Print Date: 31-08-2009

Checked By: [Signature]

[Signature]
Ara-ur-Rehman Amjid
Subject Specialist
AFS Karori Manshra

[Signature]

Errors and omissions are subject to subsequent rectification.
Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations
Hazara University, Manshra
August 29, 2009

Attested

[Signature]

P-21



HAZARA UNIVERSITY

SNo: 0992

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (PREVIOUS)
ANNUAL EXAMINATION 2011

Roll No: 16894 Reg No: 9092MIAFPX-BA7
 Name: Uzma Sarfraz Father's Name: Muhammad Sarfraz
 Institution / District: MANSEHRA Subject: Urdu

Course Title:	Max. Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
History of Urdu Literature	100		40		40	FORTY	Pass
Fiction	100		43		43	FORTY-THREE	Pass
Prose	100		52		52	FIFTY-TWO	Pass
Modern Prose	100		49		49	FORTY-NINE	Pass
Ghazal	100		44		44	FORTY-FOUR	Pass
Total: 500					228	TWO HUNDRED TWENTY-EIGHT	
Percentage: 45.60							

Print Date: 31-01-2012

Checked By:

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations
Hazara University, Mansehra
January 31, 2012

Attested

Attested
Subject Specialist
GHSZ Karan Mansehra



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2013

Roll No: 36633

Reg No: 0092MAFFX-BA7

Name: Uzma Sarfraz

F/ Name: Muhammad Sarfraz

Institution/ MANSEHRA

Subject: Urdu

District:

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				228	TWO HUNDRED TWENTY-EIGHT	
Poetry "Nazam"	100		57		57	FIFTY-SEVEN	Pass
Qaseeda, Masnavi & Marsia	100		61		61	SIXTY-ONE	Pass
Iqbaliat	100		55		55	FIFTY-FIVE	Pass
Criticism	100		50		50	FIFTY	Pass
Essay	100		53		53	FIFTY-THREE	Pass
General Viva Voce	100		59		59	FIFTY-NINE	Pass
Totals: 1100					563	FIVE HUNDRED SIXTY-THREE	
Percentage: 51.18							
Division: SECOND							

Print Date: 10-03-2014

Checked By:

A. Hestari
Aziz
 Controller Examinations
 Hazara University, Mansehra

Errors and omissions are subject to subsequent rectification.
 Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations
 Hazara University, Mansehra
 March 05, 2014

Attested
Rafiq

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

P 23

Annex
"A"



Social No. 413433

PROVISIONAL RESULT CARD

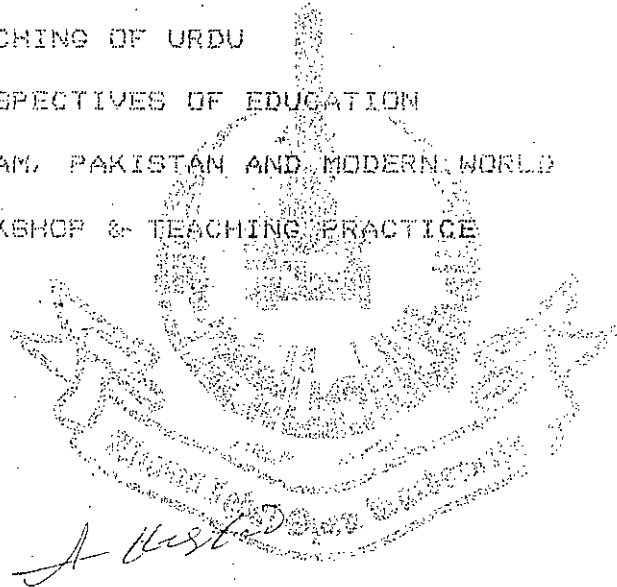
Name: UZMA SARFRAZ
 SARFRAZ AHMAD
 Father's Name: MURTAZA AL REHIM MEDICAL STORE
 Address: BARLVI BAZAR BALAKOT

Roll No. AJ693325
 Registration No. 07NMA1853
 Final Semester SPR-2012

Tehsil: MANSEHRA
 District: BACHELOR OF EDUCATION (B. ED)
 has successfully completed

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 11	0513	SCHOOL ORGANIZATION	100	63
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	65
SPR- 11	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
SPR- 11	0651	ENGLISH (COMPULSORY)	100	65
AUT- 11	0654	TEACHING OF ISLAMIAT	100	64
AUT- 11	0658	TEACHING OF URDU	100	65
SPR- 12	0512	PERSPECTIVES OF EDUCATION	100	61
SPR- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	63
SPR- 12	0655	WORKSHOP & TEACHING PRACTICE	100	71



Attested

A. Iqbal

CREDITS: 6

Total Marks / Obtained

900 / 577
64 B

Result Declared on JANUARY 04, 2013

Percentage / Grade

Date of issue JANUARY 18, 2013

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

P-25
Annex C

TAT-1 FEMALE MANSEHRA RESULT 2011

Roll No	Name	Father Name	Marks	%age
1701755	SHAZIA BIBI	FAQIR MOHD	128	42.67
1701756	SADIA NAWAZ	SHAH NAWAZ	64	Fail
1701758	SADAF	SHOUKAT ALI	100	Fail
1701759	SAFEENA BIBI	NAZIR MOHD	Absent	#VALUE!
1701760	ABIDA BIBI	ALI BAH DAR	92	Fail
1701762	HIRA ASLAM	ASLAM KHAN	72	Fail
1701763	HASINA BIBI	MOHD PARVEZ	92	Fail
1701764	GULNAZ BIBI	MOHD AYUB	60	Fail
1701765	SABA GUL	MOHD PARVEZ	108	Fail
1701766	SAMMAN	HAQNAWAZ	116	Fail
1701767	NOSHEEN NIAZ	NIAZ MOHD	124	41.33
1701768	TABSUM BIBI	ABDUL RASHID	136	45.33
1701769	SUMIRA	ABDUL HAMID	124	41.33
1701770	MAHJABEEN	MOHD MASOOD	156	52.00
1701771	UZMA	SABEERAZ	136	45.33
1701772	BIBI NAZEEN	MOHD MASOOD	128	42.67
1701773	ABIDA BIBI	SAIN MOHD	104	Fail
1701774	BIBI ASIA	MOHD MUSTAQ	104	Fail
1701775	RIZWANA BIBI	MISRI SHAI	104	Fail
1701776	SHAFIQA	BASHIR AHMED	84	Fail
1701777	FAIZA RANI	MOHD FAREED	84	Fail
1701778	SAIRA	MOHD ANWAR	48	Fail
1701779	SHAHBANA	JEHANZEB	124	41.33
1701780	NAZIA SHAH	SHAD MOHD	124	41.33
1701781	NOSHEEN GUL	AMAM DIN	140	46.67
1701782	NUZHAT SHAHEEN	AMAM DIN	128	42.67
1701783	HAMIDA BIBI	BAHADUR KHAN	144	48.00
1701784	NIOGHAT SHAHEEN	IMAM DIN	140	46.67
1701785	MUSSRAT SHAHEEN	AMAM DIN	152	50.67
1701786	SHAMZA	AURAN GZEB	160	53.33
1701787	BIBI FARHAT	AURAN GZEB	120	40.00
1701788	SUGRA	MOHD IQBAL	112	Fail
1701789	HASINA NAZ	SARWAR SHAH	100	Fail
1701790	NAVEEDA PARVIN	SAIN MOHD	88	Fail
1701791	SIDRA BEGUM	SAIN MOHD	188	62.67
1701792	SANJEEDA BIBI	SULTAN MOHD	40	Fail
1701793	SUMIRA	MOHD FAREED	72	Fail
1701794	ASIFA NOREEN	ABDUL SALAM	Absent	#VALUE!
1701795	ABIDA	ANWAR ZEB	116	Fail
1701796	TASLEEM KOSAR	ABDUL QAYUM	84	Fail
1701797	SAEEDA BANO	MOHD SALEH	92	Fail
1701798	NADIA RUBY	ABDUL RASHID	112	Fail
1701799	MUNEBA CHAND	MOHD BASHIR	152	50.67
1701800	KHUDIJA CHAND	MOHD ASLAM	160	53.33
1701801	SALMA BIBI	ABDUL REHMAN	156	52.00
1701802	TABSUM BIBI	GHULAM SARWAR	44	Fail
1701803	GUL NAZ	M MASKEEN	108	Fail
1701804	MEHNAZ	MOHD BASHIR	112	Fail
1701805	SEHRISH BIBI	DURI AMAN	104	Fail
1701806	ASMA ZEB	ANWAR ZEB	160	53.33
1701807	BIBI SALMA	ABDUL QAYUM	64	Fail
1701808	RUKHSANA	MOHD RAFIQUE	72	Fail
1701809	ZAITOON BIBI	MOHD RAFIQUE	52	Fail
1701810	NABEELA SHEREEN	ABDUL QAYUM	80	Fail
1701811	UMARA AYUB	MOHD AYUB	64	Fail
1701812	RASHIDA BIBI	ABDUL QAYUM	144	48.00
1701813	CHAN BIBI	ABDUL QUYUM	128	42.67

ORDER

In continuation of this office order No. 5360-5384 (Estt. (F)Appnt/PST (F)/2011-12 Dated Mansehra the 18th May 2012 and on the acceptance of the appeal by the competent authority ~~ATRS/2011/5360-5384~~ D/O Surfaraz R/O Chanoor is hereby appointed as a Primary School Teacher PST (Female) against the vacant post at GIPS Badal Gran in BPS 7 on Rs.5800.00-15000 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/UC Certificate from the secretary concerned union councils along with bank drafts in the name of controller / treasurer of the concerned BISE / University within 15 days after the taking over charge for verification.
6. The release of the pay by the concerned BDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.

Attested

Asif

[Signature]

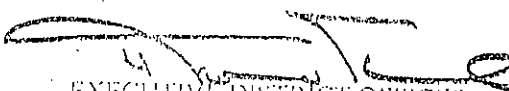
P-27
Annex D

8. His/her services are liable to termination on one month prior notice from either side in case of resignation without prior notice, his/her one month pay/allowances if any shall be forfeited to Government Treasury.
9. His/her services can be terminated at any time in case his/her performance is found un-satisfactory; he/she will be proceeded against under the removal from service under E&D Rules 2011.
10. He/she should produce Age & Health Certificate from the MS DHO Hospital Manshra.
11. He/she may not be handed over the charge if his/her age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in previous post, his/her entitled for pension / gratuity etc.
13. No. F.A/D.A etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No. 6830-28 /Estt: Appn: PST/2011-12 Dated Manshra the 2/5 2012
Copy to the:-

1. Secretary to Govt. of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Manshra.
- 4-5. District Officer (M&F) Local Office.
- 6-7. Deputy District Officer (Female&Male) E&SE Manshra.
8. PA to District Coordination Officer, Manshra.
9. Budget & Accounts Officer, local office, Manshra.
10. Candidates concerned.


EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Attested



P-28
Annex D

رجسٹرڈ آک روایت
رجسٹرڈ آک روانگی

Register of Letters Despatched

Serial No. نمبر شمار	Month & Date ہینہ اور تاریخ	Name And Address نام اور پتہ	Place مقام	Subject مضمون	File No. فائل نمبر	Stamps Received ٹکٹ آمد		Stamps Used ٹکٹ استعمال		Stamps Balanced بقایا ٹکٹ		Remarks کیہ
						Rs.	Ps.	Rs.	Ps.	Rs.	Ps.	
689649		AD Com		order of Shaita Sul No 1								

Endorsement Register

Attested
[Signature]

P-30
Annex = E

~~12~~

Manshra

S#: 1

P Sec:001 Month:May 2015
MA7044 -Dy D O (F) Pry Edu Mansehr
Min: Education Schools
NTN:
GPF #:
Old #:

Pers #: 00729085 Buckle:
Name: UZMA SARFRAZ
Dsg.: PRIMARY SCHOOL TEACHER
CNIC No.1350162115998
GPF Interest Applied

MA7044 -

PAYS AND ALLOWANCES:	
5002-Adjustment House Rent	1,306.00
5011-Adj Conveyance Allowance	2,856.00
5012-Adjustment Medical All	1,200.00
5309-Adj. 15% Adhoc Allowance	1,050.00
5898-Adj. Adhoc Allowance 50%	2,177.00
5911-Adj. Adhoc Relief 2011	653.00
5938-Adj. Adhoc Relief All 2012	1,400.00
5950-Adj:Adhoc Relief All-2014	700.00
5801-Adj Basic Pay	7,000.00
Gross Pay and Allowances	18,342.00

DEDUCTIONS:

Subrc:

Total Deductions	0.00
	18,342.00

D.O.B	LFP Quota: 4
11.03.1986	ALLIED BANK LIMITED BALAKOT
03 Years 00 Months 000 Days	2797-7

Attested
Rafiq

P-31
Manshra "E"

Manshra

P Sec:001 Month:April 2015
MA7044 -Dy D O (F) Pry. Edu Mansehr
Min: Education Schools
NTN:
GPF #:
Old #:

: 1
Pers #: 00729085 Buckle:
Name: UZMA SARFRAZ
Dsg.: PRIMARY SCHOOL TEACHER
CNIC No.1350162115998
GPF Interest Applied

12 Active Temporary
PAYS AND ALLOWANCES:
5002-Adjustment House Rent
5012-Adjustment Medical All
5309-Adj. 15% Adhoc Allowance
5898-Adj. Adhoc Allowance 50%
5911-Adj. Adhoc Relief 2011
5938-Adj. Adhoc Relief All 2012
5950-Adj. Adhoc Relief All-2014
5801-Adj Basic Pay

MA7044 -
1,306.00
1,200.00
1,050.00
2,177.00
653.00
1,400.00
700.00
7,000.00
15,486.00

Gross Pay and Allowances
DEDUCTIONS:

Subrc: 100.00

4200-Professional Tax

Total Deductions

100.00
15,386.00

D.O.B
11.03.1986
02 Years 11 Months 000 Days

LFP Quota: 4
ALLIED BANK LIMITED BALAKOT
2797-7

Attested
Chafiq

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

No 7446

Dated 12/9 /2014

P-32

Annex = 'F'

SHOW CAUSE NOTICE.

I, Naghmata Sardar, District Education officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) rules, 2013, do hereby serve you Mst:Uma Sarfraz D/O Sarfraz PST GGPS Badal Gran Mansehra as follows:

1) (1) You were appointed as PST at GGPS Badal Gran vide defunct Executive District Education Officer (E&SE) Mansehra Endst: No. 6830-39/Estt:Apptt: PST 2013-12 dated 31-5-2012, whereas you were stranger for recruitment process initiated through EATA, you never appeared in selection process as a candidate for the said post through EATA. Your name did not fall in the merit list prepared for the selection of candidates. Acceptance of your appeal and subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pukhtunkhwa, elementary and Secondary Education Department Letter No. SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25.8.2014. More over the then EDO (E&SE) has been removed from Government Service in connection with all such bogus appointment including you made by him.

2) Going through the findings and recommendations of the inquiry committee, the material on record and other connected papers including your defence before the inquiry committee:-

I am satisfied that you have committed the following acts/Omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
 - b) Inflicted huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
 - c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating / cancelling the facts for an lawful appointment with coorandation of then EDO.
3. As a result thereof, I as competent authority, have tentatively decided to impose upon you the major ^{penalty} penalty of dismissal from services under rule 4 of the said rules.
4. You, are thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.
6. A copy of the finding inquiry committee related page is enclosed

COMPETENT AUTHORITY

9. Mst: _____
10. Office File.

DISTRICT EDUCATION OFFICER

The District Education Officer (Female)
District Mansehra

P-33
Annex "F"

Subject: DEFENCE REPLY IN RESPECT OF MRS. UZMA
SARFRAZ PST, GGPS BADAL GRAN MANSEHRA

Reference: SHOW CAUSE LETTER NO: 7416 DATED 12-09-2014
FROM THE OFFICE OF DEO(F) MANSEHRA

Respected Madam:-

It is humbly requested that I received your letter number and subjected mentioned above. In this regard I want to submit my few points, which may add something new in your kind information and it may also correct your office record. The most important point is that, there are few allegations charged against me. I solemnly declare that all of these allegations are baseless and totally wrong. I strongly reject these allegations. the detailed defence reply point to point is as under.

1. I have applied and processed through proper and prescribed way of recruitment i.e through EATA tests. There is a technical mistake, I was included in the merit list of union council Ghari Habibullah instead of U/C Ghanool Balakot Mansehra.
 - a. Basically I was a resident of U/C Ghari Habib Ullah, But due to my marriage, which took place in the month of 1ST June, 2007, I was shifted to U/C Ghanool.
 - b. At the time of document submission (Registration). I have submitted the relevant documents i.e. Nikah Nama+ CNIC with my husband + Union Council Certificate, (All these documents clearly shows that my new union council is U/C Ghanool but due to official negligence I was still accorded in the merit list of Ghari Habib Ullah.
 - c. While the mind lowing fact is that I achieved the score of 48-27, if your sub ordinate staff have not shown their professional negligence, I would be the toper of my U/C. so, I am the suffer. Please tell me, why not, I initiate a struggle for my right as your office badly discriminate me.
 - d. Photocopy of all these documents are attached herewith for your kind consideration.

Rashid

P- (34)
Annex = F

2. I am not in a position to say something about your findings and reports of inquiry committee, but I have something to say in response of your sub points under point No 02.
 - a. There is no misconduct ion and dishonesty on my behalf what so ever the circumstances are, as I have explain my position in point no. 01.
 - b. I am absolutely not involved in my financial loss to the Govt. Treasury as I had followed all the prescribed method of recruitment.
 - c. As I have appointed through proper channel, hence I had never snatch any established rights of any deserving candidate. My all supporting documents are annexed here with for your ready reference.
3. Above mentioned facts are good enough to reconsider your decision. /uphold the decision regarding imposing of major penalty.
4. I request you that please consider my defense reply in this regard and allow me to explain my position in court of you in the form of personal hearing.

I shall be thankful to you for your kind consideration.

Thanks.

Truly yours

Uzma Saifraz
PST, GGPS
Badal Granal

Affected

Rahfar

Uzma Saifraz
30-9-14

رخصتی شواہد

تصدیق کی جاتی کہ مسی ... ولد ...
کا نکاح ہمراہ مسات ...
تخصیص بالا کوٹ ضلع مافسرہ مورخہ ...
کوہوی



دستخط و مهر
نکاح رجسٹرار

Attested and verified according to the Nikah Registrar
Mr. ... Village, Khawaja U.C Garhi Habibullah

Secretary
U.C Garhi Habibullah
SECRETARY
Union Council Garhi Habibullah
Tehsil Balakot

Handwritten notes in Urdu script, including a date reference: 07-06-2007

Attested
Attested
Atta-ur-Rehman Amjid
Subject Specialist
GHSS Karori Mansera

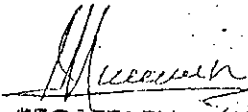
Attested
Attested

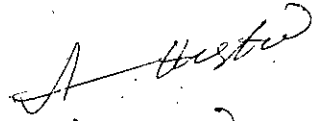
P-36

Annex-F

یونین کونسل سکونتی سر ٹیکٹ

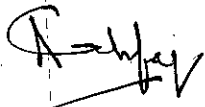
تقدیق کی جاتی ہے کہ مسماة عظمیٰ شعیب زوجہ محمد شعیب گاؤں جو سچہ بھنگیاں
یونین کونسل گنھول تحصیل بالا کوٹ ضلع مانسہرہ کی رہائشی و سکونتی ہے۔
لہذا رپورٹ عرض ہے۔


SECRETARY
UNION COUNCIL
GHANCOL



Atta-ur-Rahman, and
Subject Specialist
GHSS Karori Manshra

Attested



P- (37)
Annex = 9



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

1:- Where as Mst: Uzma Sarfraz D/O Sarfraz working as PGHS/GGMS/GGP Badakhshan was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.

2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.

- i) Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
- ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Mala Haripur.

3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.

4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.

5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011: the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Uzma Sarfraz D/O Sarfraz CT/PET/TT PSI GGHS/GGM/GGPS Badakhshan.

Attested
Rahje

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1916-25 /AE- /Estab: dated 03/03 /2015.

Copy to the:-

- 1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- 2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3. District Accounts Officer Mansehra
- 4. District Monitoring Officer Mansehra.
- 5. Deputy Commissioner Mansehra.
- 6. Principal/Headmistress _____
- 7. SDEO(F) Mansehra.
- 8. Budget and Accounts Officer Local Office
- 9. Mst: _____
- 10. Office File.

[Signature]
DISTRICT EDUCATION OFFICER

P-38
Annex = H

To

The Director Elementary & Secondary Education
KPK Peshawar.

Subject:- Department Appeal against the impugned notification issued under Endstt No. 1916-25/AE/Estab: dated 03/03/2015 whereby major penalty of dismissal from Govt. service was imposed upon the appellant in a highly capricious/whimsical manner without lawful authority / copy of impugned notified is attached & marked as annex.

Prayer : Captioned impugned notification may please be sent aside from the date of its issuance declaring the same without lawful authority contradictory to the recruitment policy & rules and re-instate the appellant with all back benefits.

Respected Sir!

I would like to invite your kind attention to the following facts in connections to colorful exercise of power on the part of authority i.e. DEO (F) Mansehra.

- I. That the then EDO (E&SE) Mansehra invited applications for recruitment of teachers in various cadres district Mansehra through advertisement published in daily AAJ Abbottabad on 20-05-2011. (Copy attached herewith).
- II. That as per procedure the Appellant applied for the post of PST and appeared in the test and a candidate under ETEA on 22/06/2011 through Roll No. 1701771 at Mansehra obtaining 136 Marks with 45.33 percentage net merit was 48:27.
- III. EDO E&SE Mansehra conducted the interviews scrutinized the documents and the appellant was appointed as the PST GGPS Badal Graan Manoor Union Council Mohandri under the adjacent union Policy as there was no post lying vacant in ours. (Copy of the said policy is attached).
- IV. That the appellant continuously performing her duties without any break for the last more that two years. Meanwhile the appellant received a show cause notice on 12/09/2014. Endstt: No 7618-19 stating that " the appellant appointment order was the result of misuse of authority by the then EDO (E&SE) Mansehra. (Copy attached)
- V. The appellant submitted the reply on 30/09/2014 explaining the factual position (Copy attached)
- VI. This is worth mentioning to submit the Appellant was transferred to GGPS Bhangrian vide Endstt No 475-80 dated 23/01/2015 quite after issuance of the show cause and submission of its reply. (Copy attached)
- VII. Meanwhile a pay release order was also issued vide Endstt No 9078-84 dated 07/11/2014. (Copy attached)

Attested

Rashid

P-39
Annex="H"

- VIII. The appellant received the impugned order on 03/03/2015 whereas major penalty of dismissal from the services has been imposed upon the appellant.
- IX. A strange thing also happened that soon after the dismissal order the DEO(F) Office Mansehra issued a mutual transfer order of the appellant to the GGPS Loonr under Endstt No. 1041-18 dated 6/3/2015. Owing to the this order the appellant has been relieved off from his services from the GGPS Bhangian and has made arrival at GGPS Loonr where the appellant is still performing considering the latest order of mutual transfers as a valid one.
- X. No enquiry was conducted or initiated. No opportunity of defense was offered, no personal hearing was made by competent authority. How the authority passed the order in the light of E&D rules and under what charges / evidences imposed such a harsh punishment of dismissal from the services?
- XI. That the enquiry regarding the illegal appointment was made against the then EDO who made appointment orders in picce meal of candidates who were really strangers for recruitment process. However appointment order of the appellant was passed after the completion of due process of recruitment.
- XII. It is further added that no such recommendations were made by the enquiry committee which was constituted to conduct inquiry against the then EDO (Copy attached)

In the light of above facts your are therefore requested to set aside the impugned notification of **dismissal from services** which are without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits.

Hopefully you will consider the matter on humanitarian grounds and take favourable n/a please.

Yours sincerely

Uzama Sarfraz 19/3-2015
Uzama Sarfraz

PST GGPS Badal Graan
Currently working at GGPS Loonr

Affected
Ashfaq

P-40
Annex = 1

LEOPARDS COURIER SERVICES PVT. LTD.

57641447



From: _____ To: *Pay*

To: *Director, Ministry*

From: _____

Pieces

From: _____

Weight

CASH *110* NO. OF DECLARED VALUE DATE *17/3* TIME

Price Inclusive of G.S.T. 12-00-3808-001-91 SIG.

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شماره پیکر: 57641447
تول: 17/3
مقام: Director, Ministry

Attested
Rahfar

FORMAT FOR APPOINTMENT OF POLLING PERSONNEL
(Local Government Election)
KHYBER PAKHTUNKHWA
OFFICE OF THE RETURNING OFFICER

P-41

Annex = J

No & Name Of District Ward: 06 No & Name of Tehsil /Town Council:
Ward : 06

No & Name of Village/Neighborhood Council: 24

Ref No: 11 Date: 12-05-2015

OFFICE MEMORANDUM

In pursuance of the provisions of Rule: 11 Of the Khyber Pakhtunkhwa Local Councils (Conduct Of Elections) rules 2014. The following appointment of presiding officer/assistant presiding officers /polling officer are hereby made

Polling station fro:

District/Tehsil/Town Council Ward: Govt Primary School Satbani (Female)

Number and Name of Polling Station

Village/Neighborhood Council: Sat Bani

(Number and Name of Polling Station)

To be held on the : 30-05-2015

Name & Designation Of Presiding Officer Designated As Officer		Name & Designation of Assistant Presiding Officers (@3 Per P.B)		Name & Designation Of Polling Officer (@1 per P.B)		Name If Assistant Presiding As Presiding	
1	Ambreen Saleem (SST) GGHSS Balakot	1	Naseema Bibi (PST) GGPS Gulgaran	1	Uzma Sarfaraz (PST) GGPS Gulgaran	Naseema Bibi (PST) GGPS Gulgaran	
		2	Bibi Fatima (PST) GGPS Kaghan	2	Bibi Naseema (PSHT) GGPS Badal Garan		Looney
		3	Erum Shakeel (PST) GGPS Kamai Ban	3			
		4	Bibi Shaheen (PST) Khaniyan	4			

Reserve Staff:

Place: Balakot

NOTE: Come For training on 21-05-2015 at GMS Shohal Mazhar At 03:00 am Positively

at shohal Mazhar
Balakot

Returning Officer

Tehsil: Balakot
Returning Officer For Wards
Mangrai, Sat Bani

Attested

Rashid

کاپی (نہ) کے لئے

P-42
Annex = K

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER, (FEMALE) MANSEHRA

ADJUSTMENT

As approved by the competent authority, the following Teachers as proposed by the ASDEO (Female) circle concerned are hereby adjusted at the station as mentioned below against their name to facilitate on humanitarian grounds on their own pay and grade in the interest of public service/Teachers with effect from their taking over charge.

S#	Name of Teacher	From (GGPS)	To (GGPS)	Remarks
1	Aisha Yousaf, SPST	Devel	CMS Choian	Against V/Post
2	Abida, PST	Kayian Mathal	Charr	Against V/Post
3	Nazia Bibi, SPST	Pudnail	Mari Safdar Shah	Against V/Post
4	Syeda Nuzhat, SPST	Chambati	Charrian	Against V/Post
5	Rani Gu, PST	Lami	Chinarkote	Against V/Post
6	Hamida Begum, PST	Seri Subedar	Charrian Battal	Against V/Post
7	Musarat, SPST	Karkala	Fazal Abad	Against V/Post
8	Hajra Jamil, PST	Lassan Nawab	Palsala	Against V/Post
9	Somia	Bandi Badhan	Maira Hajam	Against V/Post
10	Nafceeda Naeem	Gara Kawai	Pairan Mansehra	Against V/Post
11	Uzma Sarfaraz	Badal Gran	Bangian	Against V/Post
12	Nusrat	Kotly Bala	Ichrian	Against V/Post
13	Sameena Gulab	Pudnial	Afzal Afad	Against V/Post
14	Saeeda Naz	Chitti Mohri	Madsarian	Against V/Post

- Note:- 1. Charge Report should be submitted to all concerned.
2. No TA/DA allowed.

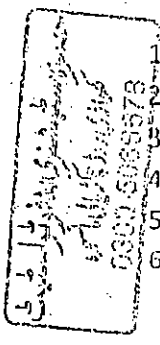
Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst: No. 475-80 / Adjustment Need basis,

Dated Mansehra the 23/01/2015

Copy to:-

1. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer, Mansehra.
3. The District Education Officer (Female) Mansehra.
4. All ASDEOs (Female) Circle Concerned.
5. Teachers Concerned.
6. Office File.



(Signature)

SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA.

Admitted

Rashid

TAT-1 FEMALE MANSEHRA RESULT 2011

Roll No	Name	Father Name	Marks	%age
1701755	SHAZIA BIBI	FAQIR MOHD	128	42.67
1701756	SADIQA NAWAZ	SHAH NAWAZ	64	Fail
1701758	SADAF	SHOUKAT ALI	100	Fail
1701759	SAFEENA BIBI	NAZIR MOHD	Absent	#VALUE!
1701760	ABIDA BIBI	ALI BAHDAR	92	Fail
1701762	HIRA ASLAM	ASLAM KHAN	72	Fail
1701763	HASINA BIBI	MOHD PARVEZ	92	Fail
1701764	GULNAZ BIBI	MOHD AYUB	60	Fail
1701765	SABA GUL	MOHD PARVEZ	108	Fail
1701766	SAMMAN	HAQNAWAZ	116	Fail
1701767	NOSHEEN NIAZ	NIAZ MOHD	124	41.33
1701768	TABSUM BIBI	ABDUL RASHID	136	45.33
1701769	SUMIRA	ABDUL HAMID	124	41.33
1701770	MAHJABEEN	MOHD MASOOD	156	52.00
1701771	UZMA	SARFARAZ	136	45.33
1701772	BIBI NAZEEN	MOHD MASOOD	128	42.67
1701773	ABDIA BIBI	SAIN MOHD	104	Fail
1701774	BIBI ASIA	MOHD MUSTAQ	104	Fail
1701775	RIZWANA BIBI	MISRI SHAH	104	Fail
1701776	SHAFIQA	BASHIR AHMED	84	Fail
1701777	FAIZA RANI	MOHD FAREED	84	Fail
1701778	SAIRA	MOHD ANWAR	48	Fail
1701779	SHAHBANA	JEHANZEB	124	41.33
1701780	NAZIA SHAH	SHAD MOHD	124	41.33
1701781	NOSHEEN GUL	AMAM DIN	140	46.67
1701782	NUZHAT SHAHEEN	AMAM DIN	128	42.67
1701783	HAMIDA BIBI	BAHADUR KHAN	144	48.00
1701784	NIOGHAT SHAHEEN	IMAM DIN	140	46.67
1701785	MUSSRAT SHAHEEN	AMAM DIN	152	50.67
1701786	SHAMZA	AURAN GZEB	160	53.33
1701787	BIBI FARHAT	AURAN GZEB	120	40.00
1701788	SUGRA	MOHD IQBAL	112	Fail
1701789	HASINA NAZ	SARWAR SHAH	100	Fail
1701790	NAVEEDA PARVIN	SAIN MOHD	88	Fail
1701791	SIDRA BEGUM	SAIN MOHD	188	62.67
1701792	SANJEEDA BIBI	SULTAN MOHD	40	Fail
1701793	SUMIRA	MOHD FAREED	72	Fail
1701794	ASIFA NOREEN	ABDUL SALAM	Absent	#VALUE!
1701795	ABIDA	ANWAR ZEB	116	Fail
1701796	TASLEEM KOSAR	ABDUL QAYUM	84	Fail
1701797	SAEEDA BANO	MOHD SALEH	92	Fail
1701798	NADIA RUBY	ABDUL RASHID	112	Fail
1701799	MUNEBA CHAND	MOHD BASHIR	152	50.67
1701800	KHUDIJA CHAND	MOHD ASLAM	160	53.33
1701801	SALMA BIBI	ABDUL REHMAN	156	52.00
1701802	TABSUM BIBI	GHULAM SARWAR	44	Fail
1701803	GUL NAZ	M MASKEEN	108	Fail
1701804	MEHNAZ	MOHD BASHIR	112	Fail
1701805	SEHRISH BIBI	DURI AMAN	104	Fail
1701806	ASMA ZEB	ANWAR ZEB	160	53.33
1701807	BIBI SALMA	ABDUL QAYUM	64	Fail
1701808	RUKHSANA	MOHD RAFIQUE	72	Fail
1701809	ZAITOON BIBI	MOHD RAFIQUE	52	Fail
1701810	NABEELA SHEREEN	ABDUL QAYUM	80	Fail
1701811	UMARA AYUB	MOHD AYUB	64	Fail
1701812	RASHIDA BIBI	ABDUL QAYUM	144	48.00
1701813	CHAN BIBI	ABDUL QAYUM	128	42.67

P-43

Annex "L"

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

MUTUAL TRANSFER.

Exchange of Posts between the following PST Teachers are hereby ordered on their own pay and grade in the best-interest of public service with immediate effect.

S.No.	Name of Teacher	From	To	Remarks.
1.	Uzma Shoaib PST	GGPS Bhangian	GGPS Loonr	Vice S.No.2
2.	Gulshan Bibi PST	GGPS Loonr	GGPS Bhangian	Vive S.No.1
3.	Saeeda Begum PST	GGPS Mohayan Khori	GGPS Jandrana	Vice S.No.4
4.	Zahida Begum PST	GGPS Jandrana	GGPS Mohayan Khori	Vice S.No.3
5.	Shazia Bibi PST	GGPS Nanoha Dakhan	GGPS Shahlia	Vice S.No.6
6.	Shaheen Bibi PST	GGPS Shahlia	GGPS Nanoha Dakhan	Vice S.No.5

Note

- Charge report should be submitted to all concerned.
- No. TA/DA is allowed to anyone.

Sd/-
District Education Officer
(Female) Mansehra

Endst: No. 1016-18 /Dated Mansehra the 06/03/ /2015

Copy to the:-

- District Account Officer Mansehra.
- SDEO (Female) Mansehra.
- ASDEO (Female) Concerned.
- Head Teachers School Concerned.
- Teacher Concerned. Office order file.

District Education Officer
(Female) Mansehra

Attested
Rashid

حاضری رپورٹ

منجانبہ عظمیٰ استحقاق PST کے لیے GGP کے آفس آفیسر
تاریخ 18-10-14 سیریل نمبر 015-03-06 آمیزہ از دفتر

ڈسٹرکٹ ایجوکیشن آفیسر زمانہ سال سپرہ کے تحت آف

مورم 07-03-15 کو کورس از ڈویژن گورنمنٹ گرنرز

برائے سکول لائسنس حاضری رپورٹ ہے رپورٹ

اردو #

ادنیٰ ڈویژن گورنرز

کالی ہیرا
1-1-1- ڈی-ای او

کالی ہیرا
ڈی-ای- او زمانہ

کالی ہیرا
آفیسر آفیسر

Taloom
Head Teacher
Govt. Girls Primary School
Loon.

Attested
Ashfaq

Releaving Report

سماة عظمیٰ سرشار P.S.T گورنمنٹ گراڈیوالمٹری سکول ہسٹنیاں

کی Mutual Transfer آفس آرڈر نمبر 1014-18 Endst: No
6-3-2015

تحت گورنمنٹ گراڈیوالمٹری سکول کو نوٹ میں ہوئی

اس لیے آج حورف 7³/₂₀₁₅ کو قبیل انز د وہاں اسکو

فارغ کیا جاتا ہے اور پراپٹ کنڈیجانی ہو سکے اس سے متعلقہ

سکیل کو نوٹ میں حاضر کریں

اول ملکہ گورنمنٹ گراڈیوالمٹری سکول ہسٹنیاں

Attested
Rahay

Signature

Head Mistress
GGPS Bhangiar
District Muzaffargarh

10



ایڈوکیٹ: سید اسحاق احمد جیلانی پانڈیٹ
بار کونسل نمبر: BC-15-2471
رابطہ نمبر: 0347-9563645

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: جسٹس سر سید رضوان KPK پشاور

منجانب:	دعویٰ: سر سید اسحاق
	علت نمبر: —
	مورخہ: 01-07-2015
	جرم: —
	تھانہ: —

مظہری سرفراز Pst
بنام
حکومت KPK و غیرہ

باعتبار آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام _____ کیلئے سید اسحاق احمد جیلانی پانڈیٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برطرف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداخت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا عد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 01-07/2015

العواہ شد

مقام کے لئے منظور ہے۔

Accepted
S. Jilani

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

مظہری سرفراز Pst
اسحاق احمد جیلانی پانڈیٹ

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

S.W.F Province
Service Tribunal
Diary No. 1284
Dated 18/11/15

In the matter of
Appeal No. 745/2015

Uzma Sarfraz (Applicant)

Versus

Govt of Khyber Pakhtunkhwa through Secretary Education,
Peshawar and others..... (Respondents)

**Application for permission for filing amended
appeal in view of the Modification in the final
order i.e conversion of penalty from dismissal to
removal from service vide order dated
25.08.2015.**

Respectfully Submitted:

1. That the above noted appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 21.01.2016, at Camp Court Abbottabad.
2. That the appellant request for allowing necessary amendment in the following ,manner inter alia on the following grounds:-

Grounds of Application

- A. That the appellant has in the titled appeal challenged the order dated 03.03.2015, vide which she has been dismissed from service. Before approaching the Honorable Tribunal, the appellant also submitted the mandatory departmental appeal on 19.03.2015, however the same was not responded till 90 days, hence the appellant filed the titled appeal.
- B. That now during the pendency of the titled appeal the Appellate authority has issued notification dated 25.08.2015, ← whereby the departmental appeal of the appellant has been rejected, however her Penalty order issued by the DEO Female, Mansehra vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. (Copy of the order dated 25.08.2015, is attached)

- C. That in light of the said modification and to avoid future complications, it is necessary to amend the titled appeal to the extent of challenging the order dated 25.8.2015.
- D. That there is no legal impleadment in allowing such permission, rather the interest of justice would best be served.

It is, therefore, humbly prayed that on acceptance of the instant application the appellant may please be allowed to file amended appeal in view of the issuance of final order whereby the penalty of dismissal from service was converted to removal from service vide order dated 25.08.2015.

Appellant *(Signature)*
10-11-2015

Through

Abdul Saboor Khan

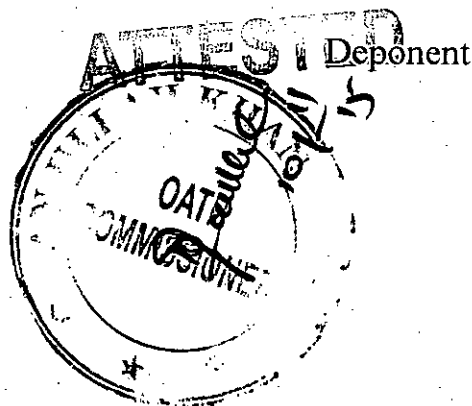
&

(Signature)
Malik Ishfaq Ahmad Jilani
(Advocates, High Court)

Affidavit

I do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal

Dated: ___/11/2015



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

WHEREAS, Mst Uzma Sarfaraz, PST at Government Girls Primary School Badal Gran District Manshehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1916-25 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the prayer to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Originally She belongs to U/C Garhi Habibullah and was married in U/C Ghannool where no post was lying vacant. Hence her appointment is out of merit. She was appointed at GGPS Badal Gran U/C Mohandri vide a continuation order Endst. No. 6830-39 dated 31/05/2012, where only one post lying vacant against which Bibi Naseema D/O Muhammad Nabi occurring at S No.1 of the merit in respective U/C was appointed. Only one post was lying vacant at the time of advertisement i.e. 20/5/2011. The claim made by the applicant regarding the claim made by the applicant regarding the existence of 02 vacancies of PST in her U/C is not valid as these have been sanctioned later on 01/04/2012.
2. Appeal may be rejected with the remarks that she was appointed out of merit.

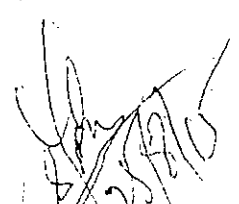
NOW, THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Mansehra vide order No. 1916-25 dated 03/03/2015 is hereby converted into removal from service.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst. No. 4335-29 / P.No. 78 / Appeals Female MSR Dated Peshawar the 28 / 7 / 2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Manshehra
2. District Accounts Officer Manshehra
3. Sub Divisional Education Officer (Female) Manshehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In the matter of
Appeal No. 745/2015

Uzma Sarfraz (Applicant)

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Education,
Peshawar and others..... (Respondents)

**Application for permission for filling amended
appeal in view of the Modification in the final
order i.e conversion of penalty from dismissal to
removal from service vide order dated
25.08.2015.**

Respectfully Submitted:

1. That the above noted appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 21.01.2016, at Camp Court Abbottabad.
2. That the appellant request for allowing necessary amendment in the following ,manner inter alia on the following grounds:-

Grounds of Application

- A. That the appellant has in the titled appeal challenged the order dated 03.03.2015, vide which she has been dismissed from service. Before approaching the Honorable Tribunal, the appellant also submitted the mandatory departmental appeal on 19.03.2015, however the same was not responded till 90 days, hence the appellant filed the titled appeal.
- B. That now during the pendency of the titled appeal the Appellate authority has issued notification dated 25.08.2015, whereby the departmental appeal of the appellant has been rejected, however her Penalty order issued by the DEO Female, Mansehra vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. (Copy of the order dated 25.08.2015, is attached)

C. That in light of the said modification and to avoid future complications, it is necessary to amend the titled appeal to the extent of challenging the order dated 25.8.2015.

D. That there is no legal impleadment in allowing such permission, rather the interest of justice would best be served.

It is, therefore, humbly prayed that on acceptance of the instant application the appellant may please be allowed to file amended appeal in view of the issuance of final order whereby the penalty of dismissal from service was converted to removal from service vide order dated 25.08.2015.

Appellant *(Signature)* 10-11-2015

Through

Abdul Saboor Khan

&

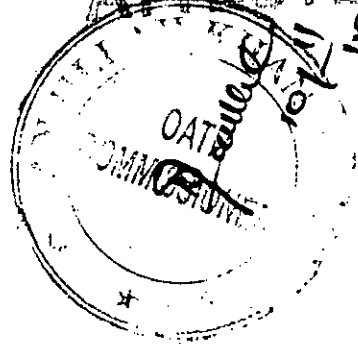
(Signature)
Malik Ishfaq Ahmad Jilani
(Advocates, High Court)

Affidavit

I do hereby solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal

Dated: ___/11/2015

Deponent



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst Uzma Sarfaraz, PST at Government Girls Primary School Badal Gran District Manshara was dismissed from service by the DEO (Female) Manshara vide Order No. 1916-25 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the prayer to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Originally She belongs to U/C Garhi Habibullah and was married in U/C Ghunool where no post was lying vacant. Hence her appointment is out of merit. She was appointed at GGPS Badal Gran U/C Mohandri vide a continuation order Endst: No. 6830-39 dated 31/05/2012, where only one post lying vacant against which Bibi Naseema D/O Muhammad Nabi occurring at S No.1 of the merit in respective U/C was appointed. Only one post was lying vacant at the time of advertisement i.e. 20/5/2011. The claim made by the applicant regarding the existence of 02 vacancies of PST in her U/C is not valid as these have been sanctioned later on 01/04/2012.
2. Appeal may be rejected with the remarks that she was appointed out of merit.

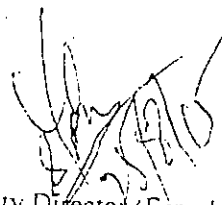
NOW, THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Manshara vide order No. 1916-25 dated 03/03/2015 is hereby converted into removal from service.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 43325-27 F.No. 78 /Appeals Female MSR Dated Peshawar the 25/8 /2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Manshara
2. District Accounts Officer Manshara
3. Sub Divisional Education Officer (Female) Manshara
4. Appellant concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP
Peshawar

Further, Manshara vide order dated 03.03.2015, is modified to the extent of conversion of Penalty of dismissal into Removal from service. (Copy of the order dated 25.08.2015, is attached)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

745
Appeal No. ~~1185~~/2015

Mst: Uzma Sarfaraz D/O Sarfaraz Ahmad, R/O Josacha, Tehsil Balakot District
Mansehra.....Appellant

Versus

1. Government of Khyber Pakhtunkhaw , through Secretary Elementary & Secondary Education , Peshawar.
2. Director Elementary & Secondary Education , Peshawar Khyber Pakhtunkhaw Peshawar
3. District Education Officer (Female) Mansehra
4. District Accounts Officer Mansehra

.....Respondents

Written reply on behalf of 1,2 & 3

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action to file the present appeal
2. That the appeal is not maintainable in its present form.
3. That the appeal is time-barred, hence not maintainable
4. That the appellant did not come to the Tribunal with clean hands.
5. That the appellant is stopped by his own conduct to file the instant appeal.
6. That the appeal is based on mala fide hence deserves dismissal
7. That the appellant has suppressed the material facts from the Honourable Tribunal, hence not entitled for relief and liable to be set aside.
8. That the competent authority has dismissed the appellant in accordance with law & rules.

9. The appointment of the appellant was illegal and against the law hence authority has conducted the inquiry against the Mr. Umar Khan Kundi (appointing authority) in which it was found the EDO E&SE Mansehra (Mr. Umar Khan Kundi) has appointed some teachers including present appellant (i.e) Uzma Sarfaraz against the policy, law & then EDO E&SE Mr. Umar Khan Kundi was removed from service by the competent authority i.e Chief Minister Khyber Pakhtoonkhaw under E&D Rules 2011 (Copy attached).
10. Any other grant and case law will be presented at the time of humble submission at the bar.

FACTUAL OBJECTION:

1. Para No.1 needs no comments as it is about the bio-data of the appellant.
2. Para No.2 needs no comments as it is describe the advertisement of vacancies.
3. Para No.3 needs no comments as it is related to NTS Test.
4. Para No.4 is incorrect at the time of advertisement there was only one post vacant in said union council.
5. Para No.5 is incorrect during the year 2012-13 in the office of the EDO E&SE Mansehra appointments of Female Teachers in various cadres were carried out pursuant to an advertisement published in daily AAJ dated 20/05/2011 whereas in certain irregularities, allegation in violation of rules and prescribed procedure were noted thereby resultant in breach of merit/illegal practice & ignoring the rightful candidate. The competent authority (Chief Minister KPK) has constituted the inquiry committee vide notification No. SO (S/M) S& SED/4-17/2013 to conduct formal inquiry.
6. Para No.6 is incorrect. The appointment order of the appellant was illegal and hence liable to be dismissed.
7. Para No.7 is correct to the extent that before the finding of the inquiry appellant was working as PST teacher & received salaries. **(Annexure –B)**
8. Para No.8 is correct to the extent that before pointing out by enquiry report that appellant order was illegal however it is fact that she performed the election duty of local election 2015 but performing of election duty is not enough ground to convert the illegal order into legal one.
9. Para No.9 is incorrect as stated the light of inquiry committee the office of the worthy secretary E&SE KPK Peshawar vide letter No. SO (S/M) S & SED/4-17/2013 Umar Khan Kundi EDO Mansehra BPS-19 (appointing authority) Dated Peshawar the August 2014 taking action against the illegal appointment, hence appellant was serve show cause notice. **(Annexure –C)**
10. Para No.10 is incorrect as stated , the reply was not satisfactory the appellant failed to defend herself.

11. Para No.11 is correct to the extent that Mr. Umar Khan Kundi EDO Manshera has adjusted the appellant as being a competent / appointing authority, rest of the para is incorrect.

12. Para No.12 is correct to the extent DEO (Female) issued the dismissal Notification dated 03/03/2015 only in the light of enquiry report.

(Annexure -D)

13. Para No. 13 is correct as stated.

14. Para No. 14 is correct to the extent that appellant filed the Departmental appeal which was decided on 25-08-2015 wherein the dismissal of appellant has been rightly converted into removal of service.

15. Para No.15 is correct to the extent that dismissal order is modified into removal from service.

16. Para No.16 pertains to Judicial record, hence no comments.

GROUND S:

- a). Para A is incorrect hence denied.
- b) Para B is incorrect. The appointment of the appellant was illegal and against the policy.
- c) Para C is not the question of vacant post but appellant authority being kind enough to convert the dismissal order into removal from service.
- d) Para D is incorrect. Appellant was dismissed and the competent authority has converted her dismissal order to removal given her relief in the light of record available in the office.
- e) Para E is incorrect. The inquiry committee and appellate authority has already been declared that the appointment of appellant was against the prescribed procedure and policy.
- f) Para F is incorrect and not applicable because every case has its own facts & circumstances; appellant service was rightly terminated.
- g) Para G is incorrect. Appellant was removed from service in the light of inquiry report. show cause notice was issued and reply of appellant was not satisfactory.
- h) Para H is incorrect and denied Major penalty was imposed in the light of inquiry report.
- i) Para I is incorrect inquiry report is self explanatory.

J. Para J is incorrect as stated.

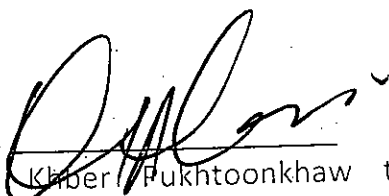
K. Para K is incorrect .The appellants appointment ordre was illegal hence the service of appellant was rightly terminated.

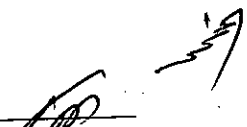
L. Para L is incorrect hence denied.

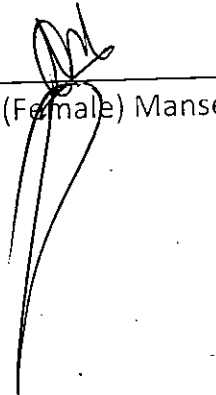
M. Para needs no comments the answering respondants seeks permission of this honourable tribunal to agitate further ground at the time of arguments / hearing.

Prayers

It is therefore humbly prayed that the appeal may kindly be dismissed with cost Please.

Respondent No 1 
 Government of Khber Pukhtoonkhaw through Secretary Education Civil
 Secretariat Peshawar.

Respondent No 2 
 The Director E&SE Education Department KPK Peshawar

Respondent No 3 
 District Education Officer (Female) Mansehra

5

AFFIDAVIT

I, Mis. Shamalia, ADEO District Education officer (F) Manserha, do hereby solemnly affirm and declared that the contents of reply in the instant Appeal No 745/15 titled case Uzma Sorkhor versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this honorable court.


RESPONDENT



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the February 27, 2014



NOTIFICATION

NO.SO(S/M)E&SED/4-17/2013/Umar Khan DEO:

WHEREAS Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) was proceeded against under the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011 for the charges mentioned in the charge sheet and statement of allegations.

2. **AND WHEREAS** inquiry committee was constituted comprising the following officers to conduct formal inquiry against the accused officer, for the charges leveled against him in accordance with the rules.

- i. Syed Hidayat Jan, (PCS SG BS-20), Special Secretary, Agricultural Department, Khyber Pakhtunkhwa Peshawar (now Secretary Zakat, Usher. and Social Welfare Department.
- ii. Mr. Khallaq Baig Principal BS-20, RITE Male Haripur

3. **AND WHEREAS** the Inquiry committee after having examined the charges, evidence on record and explanation of the accused officer has submitted the report.

4. **AND WHEREAS** a show cause notice was served upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) dated 25-12-2013 circulated to him on 01-01-2014.

5. **AND WHEREAS** the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the Show Cause Notice and personal hearing granted to him by Secretary Establishment Khyber Pakhtunkhwa on behalf of Chief Minister Khyber Pakhtunkhwa on 14-02-2014 at 1100 hours, is of the view that the charges against the accused officer have been proved.

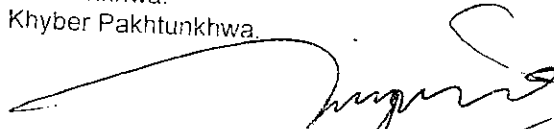
6. **NOW, THEREFORE**, in exercise of the powers conferred under section 14 of Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to impose major penalty of "**Removal from service**" upon Mr. Umar Khan Ex-Executive District Officer (BS-19), E&SE/ District Education Officer Male Mansehra (now District Education Officer Male Karak) with immediate effect.

SECRETARY

Endst: of Even No. & Date:

Copy forwarded to the: -

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
- 3- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 4- District Education Officer (Male), Mansehra/ Karak.
- 5- Mr. Umar Khan District Education Officer Male (BS-19) District Karak.
- 6- District Accounts Officer Mansehra/ Karak.
- 7- PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 8- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9- PS to Special Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 10- Office order file.


(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No.SO(S/M) E&SED/4-17/2013/Umar Khan EDO BS-19
Dated Peshawar the August 25, 2014

(A)

To.

- i. The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
- ii. District Education Officer (Female)
Mansehra.

Mr. ...
please ...
put up ...
DEO

Subject: - ENQUIRY REGARDING APPOINTMENT/ GUIDANCE.

I am directed to refer to your letter No.3076 dated 16-07-2014 on the subject noted above and to forward herewith a copy of inquiry report conducted by inquiry committee comprising the following officers.

- i. Syed Hidayat Jan, (PCS SG BS-20) Ex-Special Secretary Agriculture Department
Khyber Pakhtunkhwa Peshawar.
- ii. Mr. Khataq Baig, Principal (BS-20) RITE Male Haripur.

2. It is requested that further action may be taken in the light of findings of the inquiry committee after issuance of show cause notices to the female teachers who were illegally appointed.

Encl: As Above:

Mujeeb-ur-Rehman
(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

8

DURJ. THE YEAR 2012 AND 13 IN OFFICE OF THE EDO, ELEMENTARY AND SECONDARY EDUCATION, DISTRICT MANSEHRA APPOINTMENTS OF FEMALE TEACHERS IN VARIOUS CADRES WERE CARRIED OUT PURSUANT TO AN ADVERTISEMENT PUBLISHED IN DAILY AAJ DATED: 20-05-2011, WHEREIN CERTAIN IRREGULARITIES/ILLEGALITIES IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE WERE NOTED, THEREBY RESULTING IN BREACH OF MERIT/ILLEGAL PRACTICE AND IGNORING THE RIGHTFUL CANDIDATES.

1. The Competent Authority has constituted the enquiry committee, comprising the following officers vide Notification No: SO(S/M)S&SED/4-17/2013 to conduct formal enquiry against Mr. Umar Khan Ex-EDO (E & SE) (BS-19) Mansehra now DEO(M) Haripur and Miss. Shamim Akhtar Deputy DO (E & SE) Mansehra (BS-18) and others for the charges mentioned in the charge sheet and statement of allegations(**Annex-A**)

SAYED HIDAYAT JAN (PCS SG BS-20), Special Secretary, Agriculture Department, Khyber Pakhtunkhwa, Peshawar.

MUHAMMAD KHALAQ BAIG, Principal (BS-20) R.I.T.E (M), Haripur.

2. Both the accused officers i.e. Mr. Umar Khan, Ex-DEO (E & SE) , Mansehra and Miss. Shamim Akhtar, Deputy District Officer(E & SE) , Mansehra have been charge sheeted as under:

a. The accused Mr. Umar Khan Ex-DEO (M) (E & SE) Mansehra presently posted as DEO(M) Haripur

1. That while posted as DEO (M) Mansehra (BS-19) committed the following irregularity (**Annex-I**)

MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.

b. Mst. Shamim Akhtar Deputy District Officer (BS-18) Female (E & SE), Mansehra

1. That while posted as Deputy District Officer (BS-18) (Female) (E & SE), Mansehra, committed the following irregularity (**Annex-II**)

MADE ILLEGAL APPOINTMENTS OF CT, DM, PET, AT, QARIAS AND PSTS (FEMALE) DURING THE YEAR 2012 AND 2013 IN VIOLATION OF RULES AND PRESCRIBED PROCEDURE IN DISTRICT MANSEHRA.

3. **Venue of Enquiry:**

The enquiry was conducted in the office of Dy. DEO (Female) Mansehra.

4. **PROCEEDINGS:**

The committee informed both the accused officers vide No. PS/SSA/Enquiry /2013 Dated 16/7/2013. The District Accounts Officer Mansehra was also asked to provide copies of appointment orders of the teachers quoted in subject enquiry (**Annex-III**)

Copies of Charge sheets and Statements of allegations which were already sent to the other officers by the Department were re-submitted to them with the directions to submit their replies in the stipulated time.

The committee visited the office of DEO (Female) Mansehra on 01/8/2013 to conduct enquiry. Mr Umar Khan Ex EDO (E & SE) Mansehra and Miss Shamim Akhtar Dy. DEO (Female) Mansehra were present alongwith their staff and attended the enquiry proceedings (**Annex-IV**)

[Signature]

[Signature]

9

8. The Present DEO (M) and Dy. DEO (F) Mansehra were asked to provide all the record /files and other related record mentioned in the letter to the committee on the day of enquiry vide. No: SS (AD) Enquiry/2013 Dated 01/08/2013 **(Annex-V)**.

The enquiry proceedings continued on daily basis w.e.f 01-08-2013 and on the very second day, one of the accused Mr. Umar Khan, insisted on his designation as recorded in his reply to the Charge sheet/statement of allegations submitted to the committee, claiming that he had not served as DEO (Male) Mansehra during the year 2012 rather he had served as EDO(E & SE)Mansehra. Despite persuasion by the committee regarding factual position of the designation as contained in the Education Department Notification No: SO(S/M E&SED/3-2/2012/Management Cadre dated: 28-12-2012, he was still adamant not to change his stance. **(Annex-V (A))**.

On account of this, the committee immediately informed and requested the Administrative Department for rectification of the designation of the accused as contained in the charge sheet/statement of allegation vide letter No: SS (AD) Enquiry/2013 dated: 02-08-2013 and subsequent reminder of even number dated: 17-08-2013 **(Annex-V(B-C))** viz a viz reminder to the department from the Chief Minister Secretariat, vide No: SO-1/CMS/KPK/3-1/2013/3514 dated: 27-08-2013 **(Annex-V (D))**.

The proceedings remained continued until the same were adjourned due to falling of Eid-UI-Fitr Holidays, Independence day, coupled with appearance in the PHC by Chairman of the enquiry committee in an official case and proceedings on leave by most of the concerned staff of the office of DEO(F), Mansehra as well. The same were, however, resumed w.e.f 16-08-2013 and since action on rectification of designation of the accused couldn't be communicated to the committee, therefore, the Administrative Department was again reminded for early needful as well as granting an extension of two weeks vide letter No: SS (AD) Enquiry/2013 dated: 27-08-2013 **(Annex-V (E))**.

The Education Department vide their letter No: SO(S/M)E&SED/4-17/2013/Umer Khan dated: 02-Sept. 2013 intimated that a summary for rectification of the designation of the accused in the charge sheet /statement of allegation was moved to the Chief Minister, Khyber Pakhtunkhwa/Competent Authority. Similarly an extension for further two weeks w.e.f 27-08-2013 was also allowed vide letter quoted ibid **(Annex-V (F))**.

FACTS

REPLIES TO THE CHARGE SHEET:

REPLY OF MR UMER KHAN TO THE CHARGE SHEET:

10. Mr. Umar Khan EX- EDO E&SE Mansehra in his reply of charge sheet sent to the committee through registered cover vide NO:7475-76 Dated 27/07/2013 *has taken the stand that he had not served as DEO (M) BS-19 Mansehra during the period 2012 but worked as EDO E&S BS-19 Mansehra w.e.f.01/03/2011/to 31/12/2012*. He added that in the charge sheet it has been recorded that he while posted as DEO(M) BS-19 Mansehra committed the irregularities of making illegal appointments of female teachers during the year 2012& 2013 in violation of rules and prescribed procedure in District Mansehra whereas he had not worked as DEO Male Mansehra during the said period. He further added that he was neither an authority for appointments for female side nor made even a single appointment of female teacher in capacity of posting as District Education Officer BS-19 (M) Mansehra and hence question of making illegal appointments of CT,DM,PET,AT,QARI, PST(Female) during the year 2012 and 2013 in violation of rules and prescribed procedure does not arise. He requested for the exemption from the charges and with-drawl of charge sheet from him **(Annex-VI)**.

[Handwritten signature]

				S.No.5 of the merit list has been appointed where as the applicant was at S.No.3. It is astonishing that appeal was received on 13.07.2012, but the appointment order was issued on 31.05.2012 i.e 02 months earlier than appeal. ((Annex- LX, A,B, C & D).	10
Rani Gul D/O Dildar Tanoli	Merit list No. Nil	Endst:No.117 0-79: Estt:/Apptt:PS T/2011-12 dated 20.06.2012. Appointed at GGPS Monjahni in BPS-7	Her order was issued by the EDO E&SE Mansehra who has indicated that the Departmental Selection Committee has approved the appointment of the candidate but no such record was produced / available on the file. Her name is not traceable in the merit list and in the selection process (Annex- LXI).	The appointment order is illegal and against the recruitment rules/ policy.	
Shahida Bibi D/O Abdur Rahim r/o Sawan Maira	Nil	Endst:1110- 19: Estt:/Apptt:PS T/2011-12 dated 20.06.2012. appointed at GGPS Gali Namshera in BPS-7	Her appointment was issued on the acceptance of appeal by EDO E&SE Mansehra. No record of appeal is available in the office file. No DPC Minutes / working papers are available. (Annex- LXII).	The appointment order is illegal and against the recruitment rules/ policy.	
Rubi Sarfranz D/O Sarfranz	UC Shoukat Abad	Endst: No.4713-23: Estt:/Apptt:PS T/2011-12 dated 26.07.2012. appointed at GGPS Single Kot in BPS-7	Her appointment order was issued on acceptance of appeal by Mr. Umer Khan Kundi EDO E&SE Mansehra. She was appointed at GGPS Singal Kot U.C Oghi. No post was vacant in her own U.C. her appointment in other Union Council is also invalid / against the recruitment rules and policy. The appointment order was issued without working papers or minutes or DSC. (Annex- LXIII).	The appointment order is illegal and against the recruitment rules/ policy.	
Uzma Sarfranz D/O Sarfranz R/O Ghanool	Nil	Endst:No.683 0-39 Estt:/Apptt:PS T/2011-12 dated 31.05.2012. appointed at GGPS Badal Gran in BPS-7	Her appointment order was issued on acceptance of appeal by Mr. Umer Khan Kundi EDO E&SE Mansehra. Her name was not available in the merit list or in EATEA Test. No working paper/DSC/Proper procedure was adopted to decide the	The appointment order is illegal and against the recruitment rules/ policy.	

BEFORE THE PESHAWAR HIGH COURT
BENCH AT OTTABBAD

W.P.NO. 930A 12013

(1) Mst. Uzma Sarfaraz D/o Sarfaraz PST Government Girls
Primary School, Badalgrai, Tehsil Balakot (2) Mst. Shafta
Gul D/O Kamal Khan, FS Government Girls Primary
School, Jalgran, Tehsil Balakot, District Mansehra.

.....Petitioners

VERJUS

- (1) The Government of K.P.K. through Secretary,
Elementary and Secondary Education, Peshawar
- (2) The Director Elementary and Secondary Education
Department, Peshawar.
- (3) The District Education Officer, Education (Female),
Mansehra.
- (4) The Deputy District Officer, Education, (Female)
Mansehra.
- (5) Assistant District Officer (Female) Circle Kaghan,
Tehsil Balakot.
- (6) District Accounts Officer, Mansehra...Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN
1973, THAT NON-RELEASING AND NON-PAYMENT OF
THE MONTHLY SALARIES OF THE PETITIONERS BY
RESPONDENTS NO.3 to 5 WITHOUT ASSIGNING ANY
VALID AND LEGAL REASON IS UNCONSTITUTIONAL,
ILLEGAL, UNLAWFUL, DISCRIMINATORY, WITHOUT
LAWFUL AUTHORITY AND AGAINST THE
CONSTITUTIONALLY GUARANTEED RIGHTS OF THE

12

(4)

Judgment Sheet

IN THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

JUDICIAL DEPARTMENT

WP No. 930-A of 2013

JUDGMENT

Date of hearing.....03/03/2015.....

Petitioners...(Mst. Uzma Sarfaraz etc) Malik
Ashfaq Jilani, Advocate.....

Respondents (Govt. of KPK etc) by Mr.
Muhammad Naeem Abbasi,
AAG alongwith DEO (F)
Mansehra, respondent No.3 ...

IRSHAD QAISER, J:- Mst. Uzma

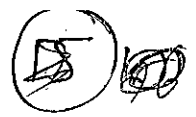
Sarfaraz and Mst. Shafia Gul, petitioners

seek the Constitutional jurisdiction of

this Court praying that;

*"It is therefore, most
humbly prayed that on
acceptance of the instant
constitutional petition the
respondents No.3 and 5
may graciously be directed
to release and pay the
monthly salaries of the
petitioners without any
further delay."*

Jilani



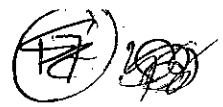
2. In essence, the grievance of the petitioners is that they were appointed in Education Department as Primary School Teachers and after their appointments, they have been rendering their services, however, respondents No.3 to 5 withheld their salaries without assigning any reason therefor; and that they have also submitted applications for release of their salaries but to no avail.

3. The respondents submitted their para-wise comments to the writ petition, wherein, they termed the appointments of the petitioners to be fake and bogus.

4. Valuable arguments of the learned counsel for the parties heard and available record of the case thoroughly considered.

5. The prayer of the petitioners for release of their salaries for the services

allegedly rendered by them cannot be endorsed because the very appointments of the petitioners, after proper inquiry by the competent authority, were declared illegal. It was clearly mentioned by the respondents in their comments that the names of the petitioners were not reflected in the merit list and they obtained illegal appointment orders and the attendance register presented by them was also fake. The Head Teachers of the concerned schools also submitted their reports to the effect that the petitioners have not performed their duties. It is also evident from the record that the then Executive District Officer, Mansehra, has been removed from service on the charges of illegal appointments of female teachers. Since, the petitioners have miserably failed to prove that they had rendered services



after their lawful and legal appointments in the Education Department, therefore, they are not entitled to be paid salaries therefor.

6. Accordingly, for the reasons mentioned hereinabove, the present petition being without any substance and legal force is dismissed.

Announced:
Dt.03.03.2015.

/*M.S.Awan*/



No.SO(S/M) E&SEL/4-17/2013/Umar Khan EDO BS-19
Dated Peshawar the August 25, 2014

To:

- i. The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
- ii. District Education Officer (Female)
Mansehra.

Mr. ... / ...
Please examine the case &
submit report to the ...
DEO

Subject: - ENQUIRY REGARDING APPOINTMENT/ GUIDANCE.

I am directed to refer to your letter No.3076 dated 16-07-2014 on the subject noted above and to forward herewith a copy of inquiry report conducted by inquiry committee comprising the following officers.

- i. Syed Hidayat Jan, (PCS SG BS-20) Ex-Special Secretary Agriculture Department
Khyber Pakhtunkhwa Peshawar.
- ii. Mr. Khaiaq Baig, Principal (BS-20) RITE Male Haripur.

2. It is requested that further action may be taken in the light of findings of the inquiry committee after issuance of show cause notices to the female teachers who were illegally appointed.

Encl: As Above:

(Signature)
(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

(7)

(9)

013

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

NOTIFICATION.

WHEREAS, Mst Uzma Sarfaraz, PST at Government Girls Primary School Badal Gran District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1916-25 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Originally She belongs to U/C Garhi Habibullah and was married in U/C Ghanool where no post was lying vacant. Hence her appointment is out of merit. She was appointed at GGPS Badal Gran U/C Mohandri vide a continuation order Endst: No. 6830-39 dated 31/05/2012, where only one post lying vacant against which Bibi Naseema D/O Muhammad Nabi occurring at S.No.1 of the merit in respective U/C was appointed. Only one post was lying vacant at the time of advertisement i.e. 20/5/2011. The claim made by the applicant regarding the claim made by the applicant regarding the existence of 02 vacancies of PST in her U/C is not valid as these have been sanctioned later on 01/04/2012.
2. Appeal may be rejected with the remarks that she was appointed out of merit.

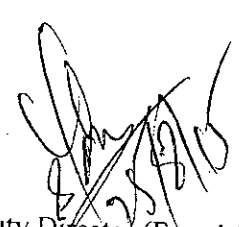
NOW, THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (a) and keeping the findings/recommendations of the committee into consideration, rejects the appeal of aforesaid sacked teacher for reinstatement, however her dismissal order issued by the DEO (F) Mansehra vide order No. 1916-25 dated 03/03/2015 is hereby converted into removal from service.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst. No. 4325-29 /F.No. 79 /Appeals Female MSR Dated Peshawar the 28/8 /2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Mansehra
2. District Accounts Officer Mansehra
3. Sub Divisional Education Officer (Female) Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP
Peshawar

BEFORE THE HONOURABLE KHYBER PAKHTUNKHAW

SERVICE TRIBUNAL PESHAWAR

Mst: Uzma Sarfaraz D/O Sarfaraz Ahmad, R/O Josacha, Tehsil Balakot District
Mansehra,

Ex-PST Government Girls Primary School, Badal Gran, Tehsil Balakot District
Mansehra.

Versus

1. Government of Khyber Pakhtunkhaw through Secretary Education, Civil Secretariat, Peshawar.
2. The Director (E&SE) Education Department K.P. Peshawar
3. The District Education Officer (Female) E&SE Mansehra
4. The District Accounts Officer, Mansehra

Replication of Application dated 18-08-2016

PRELIMINARY OBJECTIONS;

It is correct that the posts GGPS Looner Gran along-with other posts of all cadres were advertised in Newspaper for recruitment.

The post of GGPS Looner was advertised in Newspaper for recruitments, for the reason that the education of the innocent kids was affecting badly due to vacancies in the said school.

That the Appellant will be adjusted against vacant post nearby any GGPS because post of PSTs are going to be vacated on retirement / death / Newly Esblished

2

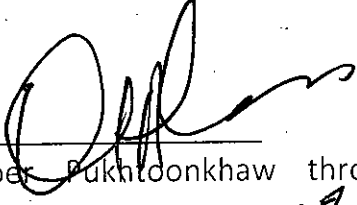
School hence as and the honourable court will decide her appeal in her her favour

In the light of above mentioned facts it is humbly prayed to set aside this application please.

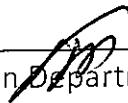
Dated:

Respondents

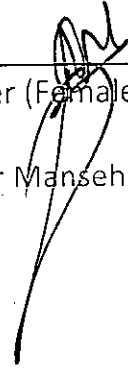
Respondent No 1


Government of Khber Pukhtoonkhaw through Secretary Education Civil Secretariat Peshawar.

Respondent No 2


The Director E&SE Education Department KPK Peshawar

Respondent No 3


District Education Officer (Female) Mansehra

District Accounts Officer Mansehra

بعدالت جناب چیئر مین سروس ٹریبونل کورٹ خیبر پختونخواہ پشاور

مقدمہ بعنوان: اپیل نمبر 745/2015 عظمیٰ سرفراز دختر سرفراز پی ایس ٹی گورنمنٹ گرلز پرائمری سکول بدل گراں سرکل کاغان، تحصیل
بالاکوٹ ضلع مانسہرہ

برخلاف

Khyber Pakhtukhwa
Service Tribunal

Diary No. 893

Dated 23/08/2016

Recd Punjab
Notice already given
to respondent on 24/08/16

محکمہ ایلیمنٹری اینڈ سکندری ایجوکیشن خیبر پختونخواہ و
ڈی ای او (زنانه) ضلع مانسہرہ

جناب عالی:-

1- یہ کہ سائلہ کی بھرتی برخلاف پی ایس ٹی پوسٹ ضلع مانسہرہ میں گورنمنٹ گرلز پرائمری سکول بدل گراں سرکل

کاغان میں بحوالہ نمبر 39-6830 مورخہ 31/05/2012 کو ہوئی (کاپی لف ہے)۔ سائلہ اپنی ڈپٹی سکول ہذا میں احسن طریقے
سے سرانجام دے رہی تھی کہ سائلہ کو مورخہ 12-09-2014 کو حوالہ نمبر 7617 کو ڈی ای او زنانه مانسہرہ کی طرف سے شوکاز نوٹس
موصول ہوا کاپی لف ہے سائلہ نے اس شوکاز نوٹس کا جواب بروقت محکمہ کو دینے کے بعد اپنے تعلیمی کام جاری رکھا اسی دوران مورخہ

23-01-2015 کو آرڈر نمبر 80-475 کو ڈی ای او زنانه کی طرف سے سائلہ کی ایڈجسٹمنٹ ٹرانسفر گورنمنٹ گرلز پرائمری سکول بدل
گراں سے گورنمنٹ گرلز پرائمری سکول بھنگلیاں میں ہوئی پوسٹنگ آرڈر کی کاپی لف ہے۔

سائلہ نے حسب قانون گورنمنٹ گرلز پرائمری سکول بدل گراں سے چارج چھوڑا اور گرلز پرائمری سکول بھنگلیاں میں حاضری کر
کے اپنی تعلیمی خدمات سرانجام دینی شروع کر دی۔

اسی دوران سائلہ کو اچانک ڈی ای او زنانه مانسہرہ کی طرف سے بغیر وجہ بتائے ہوئے بغیر پرنسپل ہیرنگ حوالہ نمبر 25-1916
بتاریخ 03-03-2015 کو ڈس مسل آرڈر ایڈجسٹمنٹ کیا گیا ڈس مسل آرڈر کی کاپی لف ہے۔

اس ڈس مسل آرڈر کے تین دن بعد بتاریخ 06-03-2015 سائلہ کو گورنمنٹ ملازم (ٹیچر) مانتے ہوئے گورنمنٹ گرلز پرائمری
سکول بھنگلیاں سے گورنمنٹ گرلز پرائمری سکول لونیر میں ڈسٹرک ایجوکیشن آفیسر زنانه مانسہرہ کی طرف سے آرڈر نمبر 18-1014
ٹرانسفر آرڈر جاری ہوا۔ آرڈر کی کاپی لف ہے۔ سائلہ نے محکمہ ایجوکیشن کے اس آرڈر کو تسلیم کرتے ہوئے گرلز پرائمری سکول بھنگلیاں سے
چارج چھوڑ کر گورنمنٹ گرلز پرائمری سکول لونیر میں چارج لینے کے بعد اپنی تعلیمی خدمات سرانجام دینا شروع کر دیا گیا۔

سائلہ نے اس ڈس مسل کے خلاف سروس ٹریبونل پشاور کورٹ کمپ کورٹ ایبٹ آباد میں اپیل نمبر 745/2015 دائر کر رکھی ہیں
جو آپ کے زیرے سماعت ہیں اور انشاء اللہ سائلہ کے حق میں جلد فیصلہ متوقع ہے۔

سائلہ کو باوثوق ذرائع سے معلوم ہوا کہ ڈی ای او زانانہ مانسہرہ نے تمام زیر سماعت پوسٹوں کو ڈائریکٹریٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور کو ان زیر سماعت پوسٹوں پر از سر نو NTS کے ذریعے تعیناتی کے لیے بھجوا دی گئی ہیں۔

چونکہ سائلہ اپنی پوسی میں ہوم سٹیشن پر تعینات تھی جبکہ بذریعہ اشتہار NTS میں یہ پوسٹیں دی گئی ہیں۔ قانوناً NTS پوسٹیں Non transferable ہیں سائلہ بحالی کے بعد تاحیات دوبارہ اپنے اس سکول میں واپس نہیں آسکے گی۔

لہذا سائلہ معزز عدالت سے التماس کرتی ہے کہ سائلہ کی پوسٹ گورنمنٹ گرلز پرائمری سکول کو فیصلہ تک NTS میں بذریعہ اشتہار دینے سے متعلقہ ڈیپارٹمنٹ کو باز رکھا جائے۔ سائلہ اس سلسلے میں قبل از وقت ڈی ای او زانانہ مانسہرہ کو درخواست دے چکی ہے جسکی

کاپی لف ہے۔ NTS نوٹ ۱۹۵۷ سالہ ہونے کی وجہ سے کاپی لف ہے۔

العارض

سائلہ عظمیٰ سرفراز EXPST گورنمنٹ گرلز پرائمری سکول لونز جو سچہ سرکل کاغان تحصیل بالا کوٹ ضلع مانسہرہ

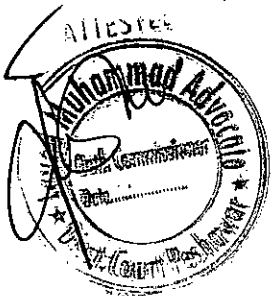
شناختی کارڈ نمبر: 8-13501-6211599

المرقوم: ۱۸-۸-۲۰۱۸

دستخط: [Signature]

بذریعہ محمد آصف یوسف زنی ایڈوکیٹ پشاور

میں مہمی عظمیٰ سرفراز اعتراف کرتی ہیں کہ میں نے جو دیکھا ہے وہ وہ ہے
اور درست ہے



[Signature]

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

In continuation of this office order No. 5360-5384 /Estt: (F)Appt:PST (F)/2011-12 Dated Mansehra the 18th May, 2012 and on the acceptance of the appeal by the competent authority, Miss: Uzma Sarfaraz, D/O Sarfaraz, R/O Ghanool is hereby appointed as a Primary School Teacher **PST (Female)** against the vacant post at GGPS Badal Gran in **BPS 7 @ Rs.5800-320-15400** plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect

TERMS & CONDITIONS:

1. His/her appointment are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. He/she will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which he/she belong.
3. In case He/she failed to assume the charge of his/her post within 15 days of his/her appointment, candidature-ship will be stand automatically cancelled.
4. His/her services are regular but will not be entitled for pension/gratuity & he/she will not contribute any amount towards GP Fund however he/she will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. He/she will submit to this office, his/her all testimonial and domicile/ UC Certificate from the secretary concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Mansehra)
7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.



8. His/her services are liable to termination on one month prior notice from either side in case of resignation without prior notice; his/her one month pay/allowances if any shall be forfeited to Government Treasury.
9. His/her services can be terminated at any time in case his/her performance is found un-satisfactory; he/she will be proceeded against under the removal from service under E&D Rules 2011.
10. He/she should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
11. He/she may not be handed over the charge if his/her age is above 35 years and below 18 years.
12. The Candidates who are working as regular before 1st July 2001 in pervious post, his/her entitled for pension / gratuity etc.
13. No. TA/DA etc js allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No. 6830-39 /Est: Appt: PST//2011-12 Dated Mansehra the 31/5 2012
Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-7. Deputy District Officer (Female&Male) E&SE Mansehra.
8. PA to District Coordination Officer, Mansehra.
9. Budget & Accounts Officer, local office, Mansehra.
10. Candidates concerned.


EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7617 / DEO/ 2014

Email: deofmanshra@yahoo.com

Dated: 12/9 / 2014

Phone & Fax: 0997-302518

To

The Head Teacher
GGPS Badal Gran Balakot
District Manseha

Subject: SHOW CAUSE NOTICE
Memo:

Show Cause notice in respect of Mst. Uzma-Safraz-D/O Sarfraz of your school is attached herewith. You are directed to serve the same to the teacher concerned and return one copy to this office as a token of receipt.

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

Enst:No. 7618-19

Copy to the:-

1. Suo Divisional Education Officer (Female) Manshra.
2. ADEO Circle concerned is directed to ensure the attendance by the concerned teacher.

DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA.

KPK (پاکستان)

P-42

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER, (FEMALE) MANSEHRA

ADJUSTMENT

As approved by the competent authority, the following Teachers as proposed by the ASD/O (Female) circle concerned are hereby adjusted at the station as mentioned below against their name to facilitate on humanitarian grounds on their own pay and grade in the interest of public service/Teachers with effect from their taking over charge.

S#	Name of Teacher	From (GGPS)	To (GGPS)	Remarks
1	Abiha Yousaf, SPST	Devel	CMS Choian	Against V/Post
2	Abida, PST	Kayian Mathal	Charr	Against V/Post
3	Nazia Bibi, SPST	Pudnail	Mari Safdar Shah	Against V/Post
4	Syeda Nuzhat, SPST	Chambati	Charrian	Against V/Post
5	Kam Gu, PST	Lami	Chinarkote	Against V/Post
6	Hanida Begum, PST	Seri Subedar	Charrian Battal	Against V/Post
7	Musarat, SPST	Karkala	Fazal Abad	Against V/Post
8	Hajra Jamil, PST	Lassan Nawab	Palsala	Against V/Post
9	Somia	Bandi Badhan	Maira Hajam	Against V/Post
10	Nafheeda Naqem	Gara Kawai	Pairan Mansehra	Against V/Post
11	Uama Sarfaraz	Badal Gran	Bangian	Against V/Post
12	Muzal	Kotly Bala	Ichrian	Against V/Post
13	Saneena Gulab	Pudnail	Afzal Afad	Against V/Post
14	Suenda Naz	Chitti Mohri	Madsarian	Against V/Post

Note: 1. Charge Report should be submitted to all concerned.
2. No TA/DA allowed.

Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

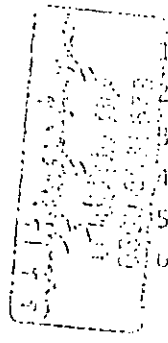
Encls: No. 475-80/Adjustment Need basis,

Dated Mansehra the 23/01/2015

Copy to:-

- The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- The District Accounts Officer, Mansehra.
- The District Education Officer (Female) Mansehra.
- All ASD/Os (Female) Circle Concerned.
- Teachers Concerned.
- Office File.

SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA.





OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

1:- Where as Mst: Uzma Sarfraz DIO Sarfraz working as GGHS/GGMS/GGP Badalgran was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice

2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.

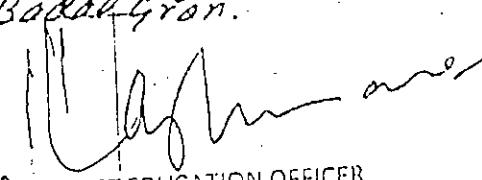
i) Syed Hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)

ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.

3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.

4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.

5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Uzma Sarfraz DIO Sarfraz CT/PET/TT PSE GGHS/GGM GGPS Badal Gran.


DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1916-25 /AE- /Estab: dated 03/03 /2015.

Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officer Mansehra
4. District Monitoring Officer Mansehra
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress _____
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office
9. Mst: _____
10. Office File.


DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Annexure - L

36

43

Annex L

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

MUTUAL TRANSFER.

Exchange of Posts between the following PST Teachers are hereby ordered on their own pay and grade in the best interest of public service with immediate effect.

S.No.	Name of Teacher	From	To	Remarks.
1.	Uzma Shoaib PST	GGPS Bhangian	GGPS Loonr	Vice S.No.2
2.	Gurshan Bibi PST	GGPS Loonr	GGPS Bhangian	Vive S.No.1
3.	Nasirida Begum PST	GGPS Mohayan Kheri	GGPS Landrana	Vice S.No.4
4.	Nasirida Begum PST	GGPS Landrana	GGPS Mohayan Kheri	Vice S.No.3
5.	Rafia Bibi PST	GGPS Nanoha Dakhan	GGPS Shahlia	Vice S.No.6
6.	Shahreen Bibi PST	GGPS Shahlia	GGPS Nanoha Dakhan	Vice S.No.5.

Note

1. Change report should be submitted to all concerned.
2. No TA/DA is allowed to anyone.

Sd/-

District Education Officer
(Female) Mansehra

Undst. No. 1014-03 / Dated Mansehra the 06/03/2015

Copy to the:-

01. District Account Officer Mansehra.
02. SDEC (Female) Mansehra.
03. ASDLO (Female) Concerned.
04. Head Teachers School Concerned.
05. Teacher Concerned. Office order file.

District Education Officer
(Female) Mansehra

بخدمت جناب ڈی ای او صاحبہ محکمہ تعلیم (زنانه) مانسہرہ

جناب عالیہ!

آپ کی خدمت اقدس میں عرض ہے کہ باوثوق ذرائع سے معلوم ہوا ہے کہ آپ کے زیر سایہ NTS کے ذریعے مختلف کیڈرز کی خالی آسامیوں پر بھرتی کے لیے اشتہار دیا جا رہا ہے۔ سائلہ بھی آپ کے زیر سایہ سابقہ استانی ہے جو کہ گورنمنٹ گرنز پرائمری سکول لونٹر سرکل کاغان میں تعینات تھی۔

سائلہ کا کیس اپیل نمبر 745/2015 سروس ٹریبونل پشاور کورٹ ایٹ آباد پنج میں زیر سماعت ہے اور

انشاء اللہ جلد ہی فیصلہ ہو جائے گا۔

سائلہ آپ سے التماس کرتی ہے کہ میری اپیل پر عمل درآمد اور فیصلہ ہونے تک میری متعلقہ سیٹ NTS میں

شامل نہ کی جاوے۔ آپ کی نوازش ہوگی۔

الارض

عظمیٰ سرفراز

EX ٹیچر گورنمنٹ گرنز پرائمری سکول

لونٹر جوچہ سرکل کاغان۔

Received.

Aug
3/8

Dear DEOs.

You can revise the vacant posts of all categories for advertisement and can send upto 5.8.2016

One time relaxation for transfer of PSTs (regular) is accorded in the following cases.

1. PST/SPST PSHT working in other UCs to their own UCs against Vacant posts,
2. Rationalization of teachers/ posts .
3. Transfer of PST/SPST PSHT to maintain 1-40 ratio .

~~Note :- Teacher recruited through NTS School based
cant be transferred.~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

List of Vacant Posts DEO (FEMLAE) MANSEHRA

S#	Name of School	SST Bio Chem:	SST Math/Phy	SST (G)	CT B-15	PET B-15	DM B-15	AT B-15	TT B-15	Qaria B-12	Remarks
1	GGHSS Baffa	1	1	0	0	0	0	0	0	0	
2	GGHSS Balakot	0	1	0	0	0	0	0	0	0	
3	GGHSS Behali	0	1	0	0	0	0	0	0	0	
4	GGHSS Lassan Nawab	1	1	0	2	0	0	0	0	0	
5	GGHSS Murad Pur	0	0	0	2	0	0	0	0	0	
6	GGHSS No.2 Mansehra	0	1	0	0	0	0	0	0	0	
7	GGHSS Oghi	1	1	0	6	0	0	0	0	1	
8	GGHSS Phulra	0	1	0	2	0	0	0	0	0	
9	GGHSS Shergrah	0	1	0	3	0	0	0	0	0	
10	GGHSS Shinkiari	2	2	0	2	0	0	0	0	0	
11	GGHSS Thathi Khurd	0	1	0	3	0	0	0	0	1	
12	GGHSS Trangri Bala	0	1	0	1	0	0	0	0	0	
13	GGCMS Shingrata	0	0	1	0	0	0	0	0	0	
14	GGCMS No.1 Mansehra	0	2	0	0	0	0	0	0	0	
15	GGHS-Afzal Abad	1	1	0	1	0	0	0	0	0	
16	GGHS Bai Bohal	0	0	0	0	0	1	0	0	0	
17	GGHS Baidra	0	1	0	0	0	0	0	0	0	
18	GGHS Battal	0	1	0	3	0	0	0	0	0	
19	GGHS Bhuto Bandi	0	0	0	1	0	0	0	0	0	
20	GGHS Bherkund	0	1	0	0	0	0	0	0	0	
21	GGHS Danda Kholian	0	0	0	2	0	0	0	0	0	
22	GGHS Darband	0	1	0	3	0	0	0	0	0	
23	GGHS Dheryal	0	0	0	1	0	0	0	0	0	
24	GGHS Dheri-Meilbut	1	1	2	2	1	1	1	0	1	F.D. Agreed for Newly created post for 2016-17
25	GGHS Dhodial	0	2	0	0	0	0	0	0	0	
26	GGHS Doga	0	0	0	1	0	0	0	0	0	
27	GGHS Gandhian	0	1	0	0	0	0	0	0	0	
28	GGHS Ghanool	1	0	1	2	0	0	0	0	0	
29	GGHS G.H.Ullah	1	1	0	5	0	0	0	0	0	
30	GGHS Hassa	0	1	0	2	0	0	0	0	0	
31	GGHS Jabori	0	0	0	1	0	0	0	0	0	
32	GGHS Jared	0	0	0	3	0	0	0	0	0	
33	GGHS Kaghan	0	0	1	0	0	0	0	0	0	
34	GGHS Kappi Gali	1	1	2	2	1	1	1	0	1	F.D. Agreed for Newly created post for 2016-17

35	GGHS Karori	1	1	0	0	0	0	0	0	0
36	GGHS Kawai	0	0	0	1	0	0	0	0	0
37	GGHS Khaki	1	0	0	0	0	0	0	0	0
38	GGHS Lalo Bandi	1	0	0	0	0	0	0	0	0
39	GGHS Mohayian	0	0	0	2	0	0	0	0	0
40	GGHS.Moorat Maira	0	1	0	2	0	0	0	0	0
41	GGHS Narbeer	1	1	0	0	0	0	0	0	0
42	GGHS Pairan	0	0	0	2	0	0	0	0	0
43	GGHS Perhina	0	0	0	3	0	0	0	0	0
44	GGHS Phagla	0	1	0	0	0	0	0	0	0
45	GGHS Sangar	0	0	0	1	0	0	0	0	0
46	GGHS Sawan Maira	0	0	0	2	0	0	0	0	0
47	GGHS SH: Najaf Khan	0	1	0	2	0	0	0	0	0
48	GGHS Shamdara	1	1	0	5	0	0	0	0	0
49	GGHS Talhatta	0	0	0	3	0	0	0	0	0
50	GGHS Trapi	0	0	0	1	0	0	0	0	0
51	GGHS Trawara	1	0	0	1	0	0	0	0	0
52	GGMS Aglagran	0	0	1	2	0	0	0	0	0
53	GGMS Ahl	0	0	0	1	0	0	0	0	0
54	GGMS Bagrian	0	0	0	1	0	0	0	0	0
55	GGMS Bai Bajna	0	0	0	2	0	1	0	0	0
56	GGMS Bai Bala	0	0	0	3	0	0	0	0	0
57	GGMS Bajna	0	0	0	2	0	0	0	0	0
58	GGMS Balian	0	0	0	0	1	0	0	0	0
59	GGMS Balimong	0	0	0	1	0	0	0	0	0
60	GGMS Bandi Sadiq	0	0	0	4	0	0	0	0	0
61	GGMS Bradaar	0	0	1	0	1	0	0	0	0
62	GGMS Brat	0	0	0	1	0	0	0	0	0
63	GGMS Chamial	0	0	1	2	0	1	0	1	0
64	GGMS Chanial	0	0	0	2	0	0	0	0	0
65	GGMS Chansar	0	0	0	1	0	0	0	0	0
66	GGMS Dadar	0	0	0	3	0	0	0	0	0
67	GGMS Devel	0	0	1	0	0	0	0	0	0
68	GGMS Fateh Bandi	0	0	1	0	0	0	0	0	0
69	GGMS Gali Badral	0	0	0	1	0	0	1	1	0
70	GGMS Gulibagh	0	0	0	2	0	0	0	0	0
71	GGMS Hari Maira	0	0	0	2	0	0	0	0	0
72	GGMS Hassari	0	0	0	2	0	0	0	0	0

73	GGMS Hathi Maira	0	0	0	1	0	0	0	0	0
74	GGMS Ichrian	0	0	0	5	0	0	0	0	0
75	GGMS Janglan	0	0	0	1	0	0	0	0	0
76	GGMS Josacha	0	0	0	2	0	0	0	0	0
77	GGMS Kamal Ban	0	0	0	0	0	1	0	1	0
78	GGMS Kandar	0	0	0	1	0	0	0	0	0
79	GGMS Karnol	0	0	0	0	0	0	1	0	0
80	GGMS Kothri	0	0	0	2	1	1	0	0	0
81	GGMS Malkan	0	0	0	2	0	0	0	0	0
82	GGMS Mandagucha	0	0	0	2	0	0	0	0	0
83	GGMS Mang	0	0	0	1	0	0	0	0	0
84	GGMS Matserian	0	0	0	1	0	0	0	0	0
85	GGMS Mohandri	0	0	0	1	0	0	0	1	0
86	GGMS Mohar	0	0	0	2	1	0	0	0	0
87	GGMS Nara Doga	0	0	0	2	0	0	0	0	0
88	GGMS Narrah	0	0	0	1	0	0	0	0	0
89	GGMS Paras-	0	0	0	2	1	0	0	0	0
90	GGMS Phagal	0	0	1	1	0	0	0	0	0
91	GGMS-Ramkot	0	0	0	2	0	1	0	0	0
92	GGMS S.M.Khan	0	0	0	1	0	0	0	0	0
93	GGMS Sakhi Bala	0	0	0	1	0	0	0	0	0
94	GGMS Seri Khair Abad	0	0	0	1	0	0	0	0	0
95	GGMS Sinjli	0	0	0	2	0	0	0	0	0
96	GGMS Sokal	0	0	1	1	0	0	0	0	0
97	GGMS Tanda	0	0	0	3	0	0	0	0	0
98	GGMS Tatar	0	0	0	2	0	0	0	0	0
99	JICA Model Phulra	0	0	0	1	0	0	0	0	0
	Grand Total:-	16	32	14	148	7	8	4	4	4

DISTRICT EDUCATION OFFICER (FEMALE)
MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

DETAIL OF VACANT POST OF PST U/COUNCIL WISE (FEMALE) DISTRICT
MANSEHRA

S.#	EMIS CODE		NAME OF SCHOOL	U/COUNCIL	B-12
1	38364	GGCMS	JABA SHEKHABAD	ATTERSHISHA	1
2	33037	GGPS	DASTAN	ATTERSHISHA	1
3	29626	GGPS	KULHARAY GHARBI	BAFFA	1
4	18432	GGPS	EID GAH	BAFFA	1
5	18338	GGPS	BAFFA BATTAGRAM	BAFFA	1
6	39033	GGPS	BEER BAT	BANDI SHUNGLI	1
7	37539	GGPS	BAI BALA	BANDI SHUNGLI	1
8	18536	GGPS	KOCHATI	BANDI SHUNGLI	1
9	32794	GGPS	PHAGORA	BANDI SHUNGLI	1
10	5339212	GGPS	KARMONG PAYEEN	BATTAL	1
11	18382	GGPS	BATTAL	BATTAL	1
12	NA	GGPS	DOTAL	BEHALI	1
13	18529	GGPS	KOT NASEER ABAD	BELIAN	1
14	33030	GGPS	BARCHAR	BELIAN	1
15	32316	GGPS	BIMBAL	CHATERPLAIN	1
16	32379	GGPS	JACHA	DEVLI JABBER	1
17	2802	GGPS	SUKIAN	DEVLI JABBER	1
18	37532	GGPS	CHUNGARI	DEVLI JABBER	1
19	323825	GGPS	TAILIAN MANDA GUCHA	DEVLI JABBER	1
20	32384	GGPS	BASO MANDA GUCHA	DEVLI JABBER	1
21	18426	GGPS	DHODIAL NO.2	DHODIAL	1
22	18442	GGPS	GHANIAN	DILBORI	1
23	32294	GGPS	NAMBAL KHABAL	DILBORI	1
24	100000249	GGPS	CHOR KALAN	DILBORI	1
25	32397	GGPS	KHABAL PAYEEN	DILBORI	1
26	18485	GGPS	JOSACHA	GHANOOL	1
27	18542	GGPS	LOONRH	GHANOOL	1
28	NA	GGPS	PATTINIAN SANGAR	GHANOOL	2
29	18659	GGPS	SANGAR SERIAN	GHANOOL	1
30	18349	GGPS	BAIDA GHANOOL	GHANOOL	1
31	32351	GGPS	BAR KOT	GHANOOL	1
32	18622	GGPS	SANGHAR	GHANOOL	1
33	18543	GGPS	LUNDA GARHI	GARHI HABIBULLAH	1
34	37527	GGPS	KUND SACHA	HANGARI	1
35	32308	GGPS	SACHA NADI	HANGARI	1
36	18360	GGPS	BELA SACHA	HANGRAI	1
37	29614	GGPS	DANNA GHANILA	HANGRAI	1
38	32246	GGPS	BELA BEGAR	HANGRAI	1
39	18470	GGPS	JABER BIGAR	HUNGRAI	1
40	18358	GGPS	BALIMONG	HILKOT	1
41	32337	GGPS	ASHWAL	HILKOT	1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

DETAIL OF VACANT POST OF PST U/COUNCIL WISE (FEMALE) DISTRICT

MANSEHRA

S.#	EMIS CODE		NAME OF SCHOOL	U/COUNCIL	B-12
42	18677	GGPS	TERHADA	HILKOT	1
43	32390	GGPS	KOTHR	HILKOT	1
44	18538	GGPS	LAMMI	ICHRIAN	1
45	32270	GGPS	DABERKATHA	JABORI	1
46	32383	GGPS	KAYAN	JABORI	1
47	34105	GGPS	KHANIAN	KAGHAN	1
48	18600	GGPS	PHAGAL	KAGHAN	1
49	18604	GGPS	PALUDRAN	KAGHAN	2
50	36761	GGPS	SERI RAJWAL	KAGHAN	1
51	32356	GGPS	JAMAL MARI	KAGHAN	1
52	32299	GGPS	RAJWAL	KAGHAN	1
53	32764	GGPS	BAGA	KARNOLE	1
54	18547	GGPS	MALHAR	KARORI	1
55	18672	GGPS	THAKRA	KARORI	1
56	38566	GGPS	GALI NAMSHERA	KARORI	1
57	32302	GGPS	SERI JHAND	KARORI	1
58	39181	GGPS	SERI MALWAL	KARORI	1
59	38713	GGPS	AKHOON BANDI	KARORI	1
60	18435	GGPS	FATEH BANDI	KARORI	1
61	NA	GGPS	LOGI PARAS	KAWAI	2
62	18660	GGPS	SUWAN	KAWAI	1
63	29193	GGPS	NOORI	KAWAI	1
64	32029	GGPS	BATRAIR	SANDA SAR	1
65	18421	GGPS	DHAMAN DHERI	LASSAN NAWAB	1
66	32389	GGPS	KHAMIAN PAYEEN	LASSAN NAWAB	2
67	36757	GGPS	SHAROTTA	LASSAN NAWAB	1
68	NA	GGPS	LUNDAI	MALIK PUR	1
69	18455	GGPS	HADO BANDI (MC)	MANSEHRA DEH	1
70	32284	GGPS	MOHANDRI	MOHANDRI	2
71	37528	GGPS	SERI MANOOR	MOHANDRI	1
72	18640	GGPS	SHALAY JARED	MOHANDRI	1
73	NA	GGPS	CHAM LASSA	MOHANDRI	1
74	32336	GGPS	BUTTAN JARED	MOHANDRI	1
75	32367	GGPS	KATHA BARI JARED	MOHANDRI	1
76	32831	GGPS	BADAL GRAN	MOHANDRI	1
77	32372	GGPS	DONG DONGIAN	MOHANDRI	1
78	18586	GGPS	GGPS Oghi	Oghi	2
79	32289	GGPS	MEHMOODA	PAIRAN	2
80	32807	GGPS	THATHI KALAN	PERHINNA	1
81	39233	GGPS	PHALKOT	PERHINNA	2
82	18559	GGPS	MADSERIAN	PHULRA	1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

**DETAIL OF VACANT POST OF PST U/COUNCIL WISE (FEMALE) DISTRICT
MANSEHRA**

S.#	EMIS CODE		NAME OF SCHOOL	U/COUNCIL	B-12
83	18492	GGPS	KALWAL	PHULRA	2
84	36758	GGPS	TREARI	PHULRA	1
85	NA	GGPS	AHL PHULRA	PHULRA	1
86	32244	GGPS	BATTANGI	PHULRA	1
87	18451	GGPS	GUJAR GALI	PHULRA	1
88	AT985	GGPS	GHAZI KOT (PHULRA)	PHULRA	1
89	18491	GGPS	KALAS RECHARI	SACHAN KALAN	1
90	18615	GGPS	SACHAN KALAN	SACHAN KALAN	1
91	32371	GGPS	HALKAI	SACHAN KALAN	1
92	32290	GGPS	MEHRAN DOGA	SAWAN MERA	1
93	18328	GGPS	SINJLI	SAWAN MERA	1
94	18465	GGPS	HAWA GALI	SHAMDHARA	2
95	18370	GGPS	BANKOT	SHAMDHARA	1
96	18355	GGPS	SHAHKOT	SHANAYA	2
97	32362	GGPS	CHAKLI BADROI	SHANAYA	1
98	39180	GGPS	GAKHAR HARIAN	SHERGARH	2
99	29287	GGPS	SERI GORIA	SHERGARH	1
100	39183	GGPS	SHAROLIAN	SHERGARH	1
101	32363	GGPS	PARCHAIAN	SHERGARH	1
102	18606	GGPS	POODNIAL	SHERGARH	1
103	32313	GGPS	LASSO ZIMADARI	SHOHAL MAZULLAH	1
104	18561	GGPS	MERA BABRAL	SHOUKT ABAD	1
105	32340	GGPS	JABA KHANI ZAMAN	SHOUKT ABAD	1
106	18330	GGPS	AFZAL ABAD	SHOUKT ABAD	1
107	18351	GGPS	BAJNA	TANDA	2
108	18664	GGPS	TANDA	TANDA	1
TOTAL NO OF VACANT POST PST CADRE: -					121

SUB DIVISIONAL EDUCATION
OFFICER

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

DETAIL OF VACANT POST OF PST U/COUNCIL WISE (FEMALE) DISTRICT
MANSEHRA

S.#	EMIS CODE		NAME OF SCHOOL	U/COUNCIL	B-12
1	38364	GGCMS	JABA SHEKHABAD	ATTERSHISHA	1
2	33037	GGPS	DASTAN	ATTERSHISHA	1
3	29626	GGPS	KULHARAY GHARBI	BAFFA	1
4	18432	GGPS	EID GAH	BAFFA	1
5	18338	GGPS	BAFFA BATTAGRAM	BAFFA	1
6	39033	GGPS	BEER BAT	BANDI SHUNGLI	1
7	37539	GGPS	BAI BALA	BANDI SHUNGLI	1
8	18536	GGPS	KOCHATI	BANDI SHUNGLI	1
9	32794	GGPS	PHAGORA	BANDI SHUNGLI	1
10	5339212	GGPS	KARMONG PAYEEN	BATTAL	1
11	18382	GGPS	BATTAL	BATTAL	1
12	NA	GGPS	DOTAL	BEHALI	1
13	18529	GGPS	KOT NASEER ABAD	BELIAN	1
14	33030	GGPS	BARCHAR	BELIAN	1
15	32316	GGPS	BIMBAL	CHATERPLAIN	1
16	32379	GGPS	JACHA	DEVLI JABBER	1
17	2802	GGPS	SUKIAN	DEVLI JABBER	1
18	37532	GGPS	CHUNGARI	DEVLI JABBER	1
19	323825	GGPS	TAILIAN MANDA GUCHA	DEVLI JABBER	1
20	32384	GGPS	BASO MANDA GUCHA	DEVLI JABBER	1
21	18426	GGPS	DHODIAL NO.2	DHODIAL	1
22	18442	GGPS	GHANIAN	DILBORI	1
23	32294	GGPS	NAMBAL KHABAL	DILBORI	1
24	100000249	GGPS	CHOR KALAN	DILBORI	1
25	32397	GGPS	KHABAL PAYEEN	DILBORI	1
26	18485	GGPS	JOSACHA	GHANOOOL	1
27	18542	GGPS	LOONRH	GHANOOOL	1
28	NA	GGPS	PATNIAN SANGAR	GHANOOOL	2
29	18659	GGPS	SANGAR SERIAN	GHANOOOL	1
30	18349	GGPS	BAIDA GHANOOOL	GHANOOOL	1
31	32351	GGPS	BAR KOT	GHANOOOL	1
32	18622	GGPS	SANGHAR	GHANOOOL	1
33	18543	GGPS	LUNDA GARHI	GARHI HABIBULLAH	1
34	37527	GGPS	KUND SACHA	HANGARI	1
35	32308	GGPS	SACHA NADI	HANGARI	1
36	18360	GGPS	BELA SACHA	HANGRAI	1
37	29614	GGPS	DANNA GHANILA	HANGRAI	1
38	32246	GGPS	BELA BEGAR	HANGRAI	1
39	18470	GGPS	JABER BIGAR	HUNGRAI	1
40	18358	GGPS	BALIMONG	HILKOT	1
41	32337	GGPS	ASHWAL	HILKOT	1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

DETAIL OF VACANT POST OF PST U/COUNCIL WISE (FEMALE) DISTRICT
MANSEHRA

S.#	EMIS CODE	NAME OF SCHOOL		U/COUNCIL	B-12
42	18677	GGPS	TERHADA	HILKOT	1
43	32390	GGPS	KOTHRI	HILKOT	1
44	18538	GGPS	LAMMI	ICHRIAN	1
45	32270	GGPS	DABERKATHA	JABORI	1
46	32383	GGPS	KAYAN	JABORI	1
47	34105	GGPS	KHANIAN	KAGHAN	1
48	18600	GGPS	PHAGAL	KAGHAN	1
49	18604	GGPS	PALUDRAN	KAGHAN	2
50	36761	GGPS	SERI RAJWAL	KAGHAN	1
51	32356	GGPS	JAMAL MARI	KAGHAN	1
52	32299	GGPS	RAJWAL	KAGHAN	1
53	32764	GGPS	BAGA	KARNOLE	1
54	18547	GGPS	MALHAR	KARORI	1
55	18672	GGPS	THAKRA	KARORI	1
56	38566	GGPS	GALI NAMSHERA	KARORI	1
57	32302	GGPS	SERI JHAND	KARORI	1
58	39181	GGPS	SERI MALWAL	KARORI	1
59	38713	GGPS	AKHOON BANDI	KARORI	1
60	18435	GGPS	FATEH BANDI	KARORI	1
61	NA	GGPS	LOGI PARAS	KAWAI	2
62	18660	GGPS	SUWAN	KAWAI	1
63	29193	GGPS	NOORI	KAWAI	1
64	32029	GGPS	BATRAIR	SANDA SAR	1
65	18421	GGPS	DHAMAN DHERI	LASSAN NAWAB	1
66	32389	GGPS	KHAMIAN PAYEEN	LASSAN NAWAB	2
67	36757	GGPS	SHAROTTA	LASSAN NAWAB	1
68	NA	GGPS	LUNDAI	MALIK PUR	1
69	18455	GGPS	HADO BANDI (MC)	MANSEHRA DEH	1
70	32284	GGPS	MOHANDRI	MOHANDRI	2
71	37528	GGPS	SERI MANOOR	MOHANDRI	1
72	18640	GGPS	SHALAY JARED	MOHANDRI	1
73	NA	GGPS	CHAM LASSA	MOHANDRI	1
74	32336	GGPS	BUTTAN JARED	MOHANDRI	1
75	32367	GGPS	KATHA BARI JARED	MOHANDRI	1
76	32831	GGPS	BADAL GRAN	MOHANDRI	1
77	32372	GGPS	DONG DONGIAN	MOHANDRI	1
78	18586	GGPS	GGPS Oghi	OGHI	2
79	32289	GGPS	MEHMOODA	PAIRAN	2
80	32807	GGPS	THATHI KALAN	PERHINNA	1
81	39233	GGPS	PHALKOT	PERHINNA	2
82	18559	GGPS	MADSERIAN	PHULRA	1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

**DETAIL OF VACANT POST OF PST U/COUNCIL WISE (FEMALE) DISTRICT
MANSEHRA**

S.#	EMIS CODE		NAME OF SCHOOL	U/COUNCIL	B-12
83	18492	GGPS	KALWAL	PHULRA	2
84	36758	GGPS	TREARI	PHULRA	1
85	NA	GGPS	AHL PHULRA	PHULRA	1
86	32244	GGPS	BATTANGI	PHULRA	1
87	18451	GGPS	GUJAR GALI	PHULRA	1
88	AT985	GGPS	GHAZI KOT (PHULRA)	PHULRA	1
89	18491	GGPS	KALAS RECHARI	SACHAN KALAN	1
90	18615	GGPS	SACHAN KALAN	SACHAN KALAN	1
91	32371	GGPS	HALKAI	SACHAN KALAN	1
92	32290	GGPS	MEHRAN DOGA	SAWAN MERA	1
93	18328	GGPS	SINJLI	SAWAN MERA	1
94	18465	GGPS	HAWA GALI	SHAMDHARA	2
95	18370	GGPS	BANKOT	SHAMDHARA	1
96	18355	GGPS	SHAHKOT	SHANAYA	2
97	32362	GGPS	CHAKLI BADROI	SHANAYA	1
98	39180	GGPS	GAKHAR HARIAN	SHERGARH	2
99	29287	GGPS	SERI GORIA	SHERGARH	1
100	39183	GGPS	SHAROLIAN	SHERGARH	1
101	32363	GGPS	PARCHAIAN	SHERGARH	1
102	18606	GGPS	POODNIAL	SHERGARH	1
103	32313	GGPS	LASSO ZIMADARI	SHOHAL MAZULLAH	1
104	18561	GGPS	MERA BABRAL	SHOUKT ABAD	1
105	32340	GGPS	JABA KHANI ZAMAN	SHOUKT ABAD	1
106	18330	GGPS	AFZAL ABAD	SHOUKT ABAD	1
107	18351	GGPS	BAJNA	TANDA	2
108	18664	GGPS	TANDA	TANDA	1
TOTAL NO OF VACANT POST PST CADRE: -					121

SUB DIVISIONAL EDUCATION
OFFICER

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

List of Vacant Posts DEO (FEMLAE) MANSEHRA

S#	Name of School	SST Bio Chem:	SST Math/Phy	SST (G)	CT B-15	PET B-15	DM B-15	AT B-15	TT B-15	Qaria B-12	Remarks
1	GGHSS Baffa	1	1	0	0	0	0	0	0	0	
2	GGHSS Balakot	0	1	0	0	0	0	0	0	0	
3	GGHSS Behali	0	1	0	0	0	0	0	0	0	
4	GGHSS Lissan Nawab	1	1	0	2	0	0	0	0	0	
5	GGHSS Murad Pur	0	0	0	2	0	0	0	0	0	
6	GGHSS No.2 Mansehra	0	1	0	0	0	0	0	0	0	
7	GGHSS Oghi	1	1	0	6	0	0	0	0	1	
8	GGHSS Phulra	0	1	0	2	0	0	0	0	0	
9	GGHSS Shergrah	0	1	0	3	0	0	0	0	0	
10	GGHSS Shinkiari	2	2	0	2	0	0	0	0	0	
11	GGHSS Thathi Khurd	0	1	0	3	0	0	0	0	1	
12	GGHSS Trangri Bala	0	1	0	1	0	0	0	0	0	
13	GGCMS Shingrata	0	0	1	0	0	0	0	0	0	
14	GGCMS No.1 Mansehra	0	2	0	0	0	0	0	0	0	
15	GGHS Afzal Abad	1	1	0	1	0	0	0	0	0	
16	GGHS Bai-Bohal	0	0	0	0	0	1	0	0	0	
17	GGHS Baidra	0	1	0	0	0	0	0	0	0	
18	GGHS Battal	0	1	0	3	0	0	0	0	0	
19	GGHS Bhuto Bandi	0	0	0	1	0	0	0	0	0	
20	GGHS Bherkund	0	1	0	0	0	0	0	0	0	
21	GGHS Danda Kholian	0	0	0	2	0	0	0	0	0	
22	GGHS Darband	0	1	0	3	0	0	0	0	0	
23	GGHS Dheryal	0	0	0	1	0	0	0	0	0	
24	GGHS Dheri Meilbut	1	1	2	2	1	1	1	0	1	F.D. Agreed for Newly created post for 2016-17
25	GGHS Dhodial	0	2	0	0	0	0	0	0	0	
26	GGHS Doga	0	0	0	1	0	0	0	0	0	
27	GGHS Gandhian	0	1	0	0	0	0	0	0	0	
28	GGHS Ghanool	1	0	1	2	0	0	0	0	0	
29	GGHS G.H.Ullah	1	1	0	5	0	0	0	0	0	
30	GGHS Hassa	0	1	0	2	0	0	0	0	0	
31	GGHS Jabori	0	0	0	1	0	0	0	0	0	
32	GGHS Jared	0	0	0	3	0	0	0	0	0	
33	GGHS Kaghan	0	0	1	0	0	0	0	0	0	
34	GGHS Kappi Gali	1	1	2	2	1	1	1	0	1	F.D. Agreed for Newly created post for 2016-17

35	GGHS Karori	1	1	0	0	0	0	0	0	0
36	GGHS Kawai	0	0	0	1	0	0	0	0	0
37	GGHS Khaki	1	0	0	0	0	0	0	0	0
38	GGHS Lalo Bandi	1	0	0	0	0	0	0	0	0
39	GGHS Mohayian	0	0	0	2	0	0	0	0	0
40	GGHS Moorat Maira	0	1	0	2	0	0	0	0	0
41	GGHS Narbeer	1	1	0	0	0	0	0	0	0
42	GGHS Pairan	0	0	0	2	0	0	0	0	0
43	GGHS Perhina	0	0	0	3	0	0	0	0	0
44	GGHS Phagla	0	1	0	0	0	0	0	0	0
45	GGHS Sangar	0	0	0	1	0	0	0	0	0
46	GGHS Sawan Maira	0	0	0	2	0	0	0	0	0
47	GGHS SH: Najaf Khan	0	1	0	2	0	0	0	0	0
48	GGHS Shamdara	1	1	0	5	0	0	0	0	0
49	GGHS Talhatta	0	0	0	3	0	0	0	0	0
50	GGHS Trapi	0	0	0	1	0	0	0	0	0
51	GGHS Trawara	1	0	0	1	0	0	0	0	0
52	GGMS Aglagran	0	0	1	2	0	0	0	0	0
53	GGMS Ahl	0	0	0	1	0	0	0	0	0
54	GGMS Bagrian	0	0	0	1	0	0	0	0	0
55	GGMS Bai Bajna	0	0	0	2	0	1	0	0	0
56	GGMS Bai Bala	0	0	0	3	0	0	0	0	0
57	GGMS Bajna	0	0	0	2	0	0	0	0	0
58	GGMS Balian	0	0	0	0	1	0	0	0	0
59	GGMS Balimong	0	0	0	1	0	0	0	0	0
60	GGMS Bandi Sadiq	0	0	0	4	0	0	0	0	0
61	GGMS Bradaar	0	0	1	0	1	0	0	0	0
62	GGMS Brat	0	0	0	1	0	0	0	0	0
63	GGMS Chamial	0	0	1	2	0	1	0	1	0
64	GGMS Chanial	0	0	0	2	0	0	0	0	0
65	GGMS Chansar	0	0	0	1	0	0	0	0	0
66	GGMS Dadar	0	0	0	3	0	0	0	0	0
67	GGMS Devel	0	0	1	0	0	0	0	0	0
68	GGMS Fateh Bandi	0	0	1	0	0	0	0	0	0
69	GGMS Gali Badral	0	0	0	1	0	0	1	1	0
70	GGMS Gulibagh	0	0	0	2	0	0	0	0	0
71	GGMS Hari Maira	0	0	0	2	0	0	0	0	0
72	GGMS Hassari	0	0	0	2	0	0	0	0	0

73	GGMS Hathi Maira	0	0	0	1	0	0	0	0	0
74	GGMS Ichrian	0	0	0	5	0	0	0	0	0
75	GGMS Janglan	0	0	0	1	0	0	0	0	0
76	GGMS Josacha	0	0	0	2	0	0	0	0	0
77	GGMS Kamal Ban	0	0	0	0	0	1	0	1	0
78	GGMS Kandar	0	0	0	1	0	0	0	0	0
79	GGMS Karnol	0	0	0	0	0	0	1	0	0
80	GGMS Kothri	0	0	0	2	1	1	0	0	0
81	GGMS Malkan	0	0	0	2	0	0	0	0	0
82	GGMS Mandagucha	0	0	0	2	0	0	0	0	0
83	GGMS Mang	0	0	0	1	0	0	0	0	0
84	GGMS Matserian	0	0	0	1	0	0	0	0	0
85	GGMS Mohandri	0	0	0	1	0	0	0	1	0
86	GGMS Mohar	0	0	0	2	1	0	0	0	0
87	GGMS Nara Doga	0	0	0	2	0	0	0	0	0
88	GGMS Narrah	0	0	0	1	0	0	0	0	0
89	GGMS Paras	0	0	0	2	1	0	0	0	0
90	GGMS Phagal	0	0	1	1	0	0	0	0	0
91	GGMS Ramkot	0	0	0	2	0	1	0	0	0
92	GGMS S.M.Khan	0	0	0	1	0	0	0	0	0
93	GGMS Sakhi Bala	0	0	0	1	0	0	0	0	0
94	GGMS Seri Khair Abad	0	0	0	1	0	0	0	0	0
95	GGMS Sinjli	0	0	0	2	0	0	0	0	0
96	GGMS Sokal	0	0	1	1	0	0	0	0	0
97	GGMS Tandā	0	0	0	3	0	0	0	0	0
98	GGMS Tatar	0	0	0	2	0	0	0	0	0
99	JICA Model Phulra	0	0	0	1	0	0	0	0	0
	Grand Total:-	16	32	14	148	7	8	4	4	4

DISTRICT EDUCATION OFFICER (FEMALE)
MANSEHRA



Dated Peshawar the January 06, 2017

NOTIFICATION

NO.SO(SM)/E&SED/4-17/2013/Reinstatement of Umar Khan Ex-DEO(M): In pursuance of Khyber Pakhtunkhwa, Service Tribunal Judgment dated 12-02-2016 in appeal No.859/2014 and subsequent dismissal of the CPLA by the Supreme Court of Pakistan vide judgement dated 30-09-2016 in Civil Petition No.191-P of 2016 against the said judgement of Service Tribunal, the Competent Authority is pleased to re-instate Mr. Umar Khan Ex-District Education Officer Male BS-19 (Management Cadre) into service w.e.f 27-02-2014 with all back benefits.

2. He is adjusted as District Education Officer Male BS-19 (Management Cadre) District Haripur against the vacant post.
3. The Denovo inquiry into the matter will be conducted in due course.

SECRETARY

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male), Haripur.
5. District Accounts Officer, Haripur.
6. Mr. Umar Khan, Ex-District Education Officer Male BS-19 Karak.
7. PS to Chief Secretary Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. Incharge EMISE E&SE Department.
10. Office order file.

SECTION OFFICER (SCHOOLS MALE)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 745/2015

Uzma Sarfaraz

VS

Education Deptt:

APPLICATION FOR TRANSFERRING THE INSTANT
APPEAL TO PRINCIPAL SEAT PESHAWAR FROM
CAMP COURT ABBOTTABAD.

R.SHEWETH.

- 1- That the above noted appeal is pending before this august Tribunal at camp court Abbottabad and fixed for 20.04.2016.
- 2- That the husband of the appellant is used to attend the Tribunal on behalf of appellant but recently the husband of appellant, who is also a special attorney of appellant, has been transferred to Peshawar (11 Corps) in January 2016. More over, the appellant being the wife of special attorney has to live with him at Peshawar. Copy of certificate and attorney are attached.

That due to reasons , mentioned in para-2 above, it would be in the interest of appellant as well as of justice to transfer the appeal to Principal Seat Peshawar for further adjudication.

Therefore, it is humbly prayed that the above noted appeal may be transferred to Principal seat Peshawar and a date may also be fixed for further proceedings at Peshawar with notices to opposite side.

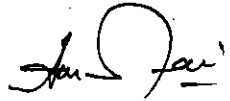
*Let the case
be perused by
the appellant's
advocate or
another attorney
at Camp Court
28.2.3/16*

APPELLANT.

THROUGH:

SPECIAL ATTORNEY.

Through;


M. Asif Yousafzai

&


Taimur Ali Khan

Advocates.

AFFIDAVIT.

It is affirmed that the contents of this application are true and correct.


DEPONENT.

ATTESTED



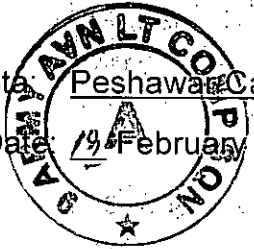
Chief
Audit
Lt Colonel

SERVICE CERTIFICATE

It is certified that Army Number 3106421 Lance Naik Muhammad Shoab is serving in 9 Army Aviation Composite Squadron under Command Formation Headquarters 11 Corps Peshawar Cantt and living with family service with effect from January 2016.

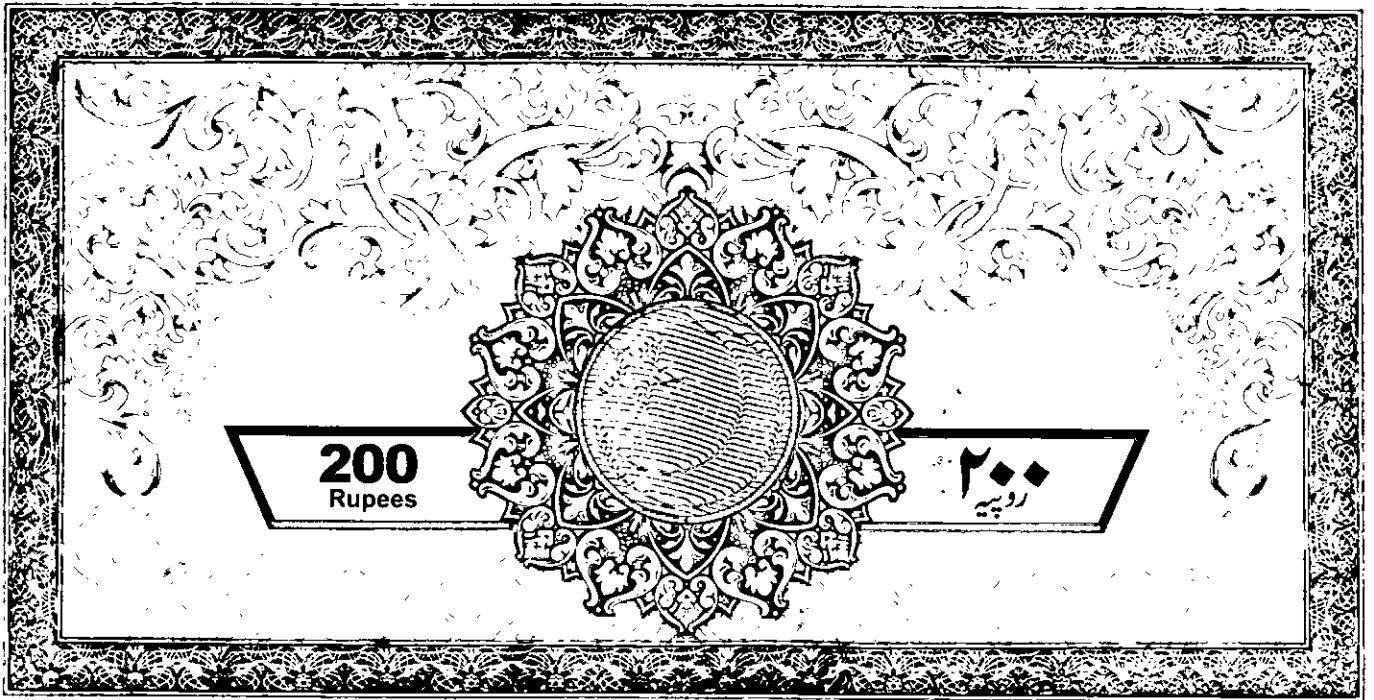


Station Peshawar Cantt
Date 19 February 2016



Ahmed
19.2.2016

Captain
For Commanding Officer
(Muhammad Ahmed Virk)



مختیارنامہ خاص بابت پیروی مقدمہ

عظمیٰ سرفراز بنام سرکار

منکہ مسماة عظمیٰ سرفراز زوجہ محمد شعیب ساکنہ جو سچہ بھنگیاں، ڈاکخانہ خاص تحصیل بالا کوٹ، ضلع مانسہرہ کی ہے۔ اختیار دہندہ بذریعہ تحریر ہذا مقرر ہوئے۔ بعنوان بالا مقدمہ میں من اختیار دہندہ کی حیثیت مدعیہ کی ہے چونکہ بوجہ دیگر مصروفیات اور پردہ اسلام من مقررہ مقدمہ ہذا کی پیروی سے قاصر ہوں۔ اسلئے بدین وقت مسمی محمد شعیب ولد محمد زمان ساکن جو سچہ بھنگیاں، ڈاکخانہ خاص تحصیل بالا کوٹ، ضلع مانسہرہ کو اپنی جانب سے مختار خاص مقرر کر کے اختیار دیتی ہوں کہ مختیار موصوف من اختیار دہندہ مذکور کی جانب سے میری غیر موجودگی میں مقدمہ بعنوان بالا میں جملہ کاروائی بذات خود وہ دستخط خود سر انجام دیوے، درخواست گزارے، نقولات مقدمہ حاصل کرے، تائید و تردید و تصدیق کرے، جواب دعویٰ و اقبال دعویٰ، وغیرہ پیش کرے ثابت مقررے کرے، گواہان پیش کرے، بیان دے وئے، اپیل کرے، نگرانی کرے، نظر ثانی کرے، وکیل یا بیرسٹر مقرر کرے غیر ضیکہ من جن جگہوں پر میری ذات و دستخطوں کی ضرورت پڑے مختیار خاص موصوف کا جملہ ساختہ و پرداختہ مثل کردہ کہ ذات و خاص کے مجھے بامثل خود قبول و منظور ہوگا۔ لہذا مختیار نامہ خاص رو بروئے گواہان سند تحریر کیا تاکہ بوقت ضرورت کام

آوئے۔ المرقوم 29/02/2016

العبد اختیار گریندہ
محمد شعیب ولد محمد زمان
شناختی کارڈ نمبر 3-1300853-13501

العبد اختیار ہندہ
مسماة عظمیٰ سرفراز زوجہ محمد شعیب
شناختی کارڈ نمبر 8-6211599-13501

ATTACHED



گواہ نمبر 2
محمد فیاض ولد خانی زمان

13501-1063739-5


گواہ نمبر 1
ریاست دین ولد نواب دین

13501-1332404-9

NO OBJECTION CERTIFICATE

It is certified that no outstanding dues against case regarding and no objection trancef for the same to Peshawar Station due to service reason Appil No. 745 Service Terbinal Peshawar (Camp Corte Abbottabad) Musmat Uzma Sarfiraz V/S Education.

Date: 11 February 2016


(Malik Ishfaq Ahmed Jalani Aducate)
CNIC No. 13503-050-4382-1

VAKALAT NAMA

NO. 745 /2015

IN THE COURT OF Service Tribunal Peshawar

Uzma Sarjaz (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Dept. (Respondent)
(Defendant)

I/We Uzma Sarjaz Through Special Attorney Shuaib

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

[Signature]
(CLIENT)

ACCEPTED

[Signature]
M. ASIF YOUSAFZAI
Advocate

[Signature]
TAIMUR ALI KHAN
Advocate

M. ASIF YOUSAFZAI
Advocate High Court,
Peshawar.

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building,
Khyber Bazar Peshawar.
Ph.091-2211391-
0333-9103240