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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO

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Shahana Hameed V.S Government of K.P

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Muharir Compilation


Incharge Judicial Branch

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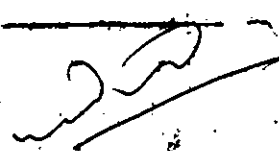
TRANSFER/MC DATED 10/06/2022 MAY KINDLY BE RESTORED IN THE BEST INTEREST OF JUSTICE.

Note: The addresses of the parties given above are sufficient for the purpose of service.

Respectfully Sheweth;

Appellant through counsel humbly submits and request as under:-

1. That the appellant is permanently residing at District Tank.
2. That the District Education Officer (Female) District Tank submitted complaint to the respondent No. 3 (Worthy Secretary E & SE) to the effect that unethical attitude of respondent No. 10. Copy of complaint is enclosed as Annexure "A".
3. That thereafter, the respondent No. 3 issued the notification bearing Endst; No. SO(MC)E&SED/4-16/POSTING/ TRANSFER/MC DATED 09/06/2022, the respondent No. 10 (Sonia Nawaz) was transferred and directed to immediately report to Directorate of E & SE KP, Peshawar due to the unethical attitude of SDEO(F) Tank / Respondent No. 10. Copy of order dated 09/06/2022 is enclosed as Annexure "B".
4. That actually the appellant was serving as SDEO(F) Urban Basha, Kohistan Upper through Order Endst; No. SO(MC)E&SED/4-16/2022/PT/MC-17/PROMOTION dated 30/05/2022, under the change circumstances of unethical behavior of the respondent No. 10, the then appellant was transferred to the District Tank against vacant post vide order dated 10/06/2022, because, the respondent No. 10 was transferred and directed to immediately report to directorate of E & SE KP Peshawar vide order dated 09/06/2022. Copies of order dated 30/05/2022 and 10/06/2022 are enclosed as Annexure "C & D".




Stationer: M. D. Khan

SA 7756/2021

24th Apr. 2024 01. Mr. Zartaj Anwar, Advocate for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgment consisting of 06 pages in connected Service Appeal No. 7755/2021, titled "Gul Shereen Versuis Government of Khyber Pakhtunkhwa through Secretary, Elementary & Secondary Education, Civil Secretariat, Peshawar and others", we are unison in saying that the respondent department could not order for recovery of any amount without conducting a proper/regular inquiry. The appeal is, therefore, allowed and the impugned order of recovery dated 30.06.2021 is set aside. The respondent department is directed to conduct a regular inquiry under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, by fully associating the appellant and fulfilling all the requirements of a fair trial, and complete the process within sixty days of the receipt of this judgment. Cost shall follow the event. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 24th day of April, 2024.*


(FAREEHA PAUL)
Member (E)



(RASHIDA BANO)
Member(J)

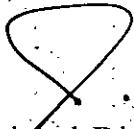
24.10.2023

Clerk of learned counsel for the appellant present.
Mr. Muhammad Jan, District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 01.01.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)


Naeem Amin

1st Jan. 2024

1. Junior to counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Former made a request for adjournment as senior counsel is not available today. Adjourned by way of last chance. To come up for arguments on 24.04.2024 before D.B. P.P given to the parties.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

Muazem Shah

SCANNED
KPST
Peshawar

09.10.2023

Learned counsel for the appellant present. Mr. Muhammad Imran, Assistant alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Para-wise comments on behalf of respondents submitted. Copy of the same handed over to learned counsel for the appellant, who requested for adjournment on the ground that he has not gone through the same. Representative of the respondents submitted receipt of an amount of Rs. 5000/- deposited by him with the Registrar of this Tribunal as cost imposed upon the respondents vide order dated 18.07.2023. Adjourned. To come up for arguments on 24.10.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KFST
Peshawar


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

18th July, 2023

1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand learned Additional Advocate General alongwith Imran, Assistant for the respondents present.

2. Learned counsel for the appellant argued his case to some extent and produced copy of order dated 31.03.2023 regarding denovo inquiry against the appellant passed by the appellate authority i.e Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. He further argued that in light of issuing denovo inquiry order by the authority, impugned order dated 30.06.2021 issued as a result of recommendation of inquiry report dated 21.11.2019 becomes infructuous and has no legal effect. Record reveals that operation of impugned order dated 30.06.2021 was suspended by this Tribunal vide order dated 07.01.2022, wherein respondents were restrained to make recovery from the appellant. Denovo inquiry was ordered by the appellate authority as a result of departmental appeal filed by the appellant, therefore, it will be in the interest of justice and fitness of things that let this appeal be kept pending till the decision of the appellate authority after receiving recommendation of denovo inquiry. Learned AAG requested that they be provided an opportunity to file written reply/comments. Request is accepted on cost of Rs. 5000/-. Adjourned. To come up written reply as well as arguments on 09.10.2023 before D.B. P.P given to the parties.


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

SCANNED
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Peshawar


SA 7756/2021

28th March, 2023

Appellant present in person. Mr. Fazal Shah Mohmand, Addl. A.G alongwith Faheemullah, Assistant for the respondents present.

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Peshawar

Reply/comments on behalf of respondents not submitted. Learned AAG requested for further time to submit the same. Another chance is given to the respondents to submit reply/comments and deposit cost of Rs. 10000/- as ordered on 21.02.2023, on 16.05.2023 before the S.B. Parcha Peshi given to the parties.



(Farceha Paul)
Member(E)

16.05.2023

Junior to counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

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Peshawar

Neither reply/comments on behalf of respondents nor costs of Rs. 10000/- was deposited on their behalf. Therefore, right of respondents for submission of reply/comments is hereby struck off. Adjourned. To come up for arguments on 18.07.2023 before D.B. Parcha Peshi given to the parties.


(Muhammad Akbar Khan)
Member (E)

(6)

16.01.2023

Learned counsel for the appellant present.
Mr. Muhammad Adeel Butt, Additional Advocate General for
the respondents present.

Despite several opportunities being given to the
respondents for submission of reply, learned Additional
Advocate General again sought time for submission of reply.
Last opportunity given. In case the last opportunity as given is
not availed, the next adjournment shall be subject to payment of
cost of Rs. 10000/-. Adjourned. To come up for submission of
written reply/comments on 21.02.2023 before the S.B.

SCANNED
KPST
Peshawar



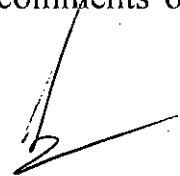
(Salah-ud-Din)
Member (J)

21.02.2023

Clerk to learned counsel for the appellant present. Mr. Muhammad
Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr.
Muhammad Tufail, Assistant for the respondents present.

Representative of the respondents requested for time to submit
reply/comments. Last opportunity is extended subject to payment of
cost of Rs. 10000/-. To come up for reply/comments on 28.03.2023
before S.B.

SCANNED
KPST
Peshawar



(Muhammad Akbar Khan)
Member (E)

20.12.2022

SCANNED
12/21/22
Pe...war

Appellant present through counsel. Muhammad Riaz Khan Paindakhel learned Assistant Advocate General for respondents present.

From the record it is evident that office was strictly directed to issue notices to the respondents for submission of written reply on 07.01.2022. It is astonishing that the respondents were neither noticed by the office of Registrar nor they were informed by the office of AAG.

In this view of the matter all the respondents be put on notice with direction to appellant to provide postal envelope and tickets within 3 days. Learned AAG is warned to be careful in further and to inform all the respondents to submit comments on or before date fixed and submit proper report in respect of the service of the respondents on the next date. Copy of this order sheet be served upon (AAG) with direction to do the needful at his end. To come up for attendance/comments on 16.01.2023
S.B.

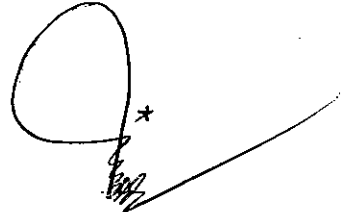
(Rozina Rehman)
Member (J)

17.11.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of reply/comments. On the request of learned Additional Advocate General last opportunity is extended for the next date with further direction to ensure submission of reply/comments as well as cost of Rs. 3000/- ordered by the court on previous date. Adjourned. To come up for reply/comments of before the S.B on 20.12.2022.

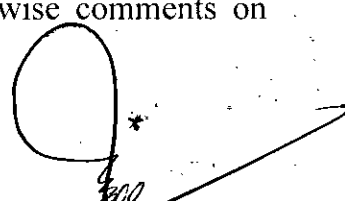
SCANNED
KPST
Peshawar


(Mian Muhammad)
Member (E)

20.07.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Bakht Mal Jan, A.D for the respondents present.

It is evident from the previous order sheet dated 02.06.2022 that the respondent department had been given last chance for submission of reply/parawise comments. Despite last chance, the respondent department could not submit the requisite reply/parawise comments today. Learned Additional Advocate General appeared on behalf of the respondents at fault and requested for yet another chance enabling him to contact and consult the respondents to submit reply/parawise comments. The request is acceded to but as last chance whereafter coercive measures shall invariably be initiated against the respondents at fault. Adjourned. to come up for reply/parawise comments on 19.10.2022 before S.B.



(Mian Muhammad)
Member (E)

19.10.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.7755/2021 titled "Gul Shereen Vs. Government of Khyber Pakhtunkhwa" on 17.11.2022 before S.B.


(Rozina Rehman)
Member (J)

(10)

07.01.2022

Counsel for the appellant present. Preliminary arguments heard.


Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments 14.03.2022.

Appellant Deposited Security & Process Fee

17/1/22

Alongwith the appeal, the appellant has also filed application for suspension of order dated 30.06.2021 till final decision of the appeal. Notice of the application be also given to the respondents.

Till date fixed, no recovery shall be made from the appellant.


(Rozina Rehman)
Member (J)

14.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 02.06.2022 for the same as before.



Reader.

2nd June, 2022

Clerk of counsel for appellant present.
Mr.Kabeerullah Khattak, Addl. AG for respondents present.

Respondents have not submitted reply/comments. Last chance is given to respondents for submission of reply/comments on 20.07.2022 before S.B.



Chairman

SCANNED
KPST
Peshawar



10

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 7756/2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 15/11/2021 | <p>The appeal of Mst. Shahana Hameed presented today by Mr. Zartaj Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2- | | <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>07/01/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |

D

(12)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Shahana Hameed

| S# | CONTENTS | YES | NO |
|----|--|-----|----|
| 1 | This Appeal has been presented by: <u>Mr. Zartaj Anwer</u> | | |
| 2 | Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents? | ✓ | |
| 3 | Whether appeal is within time? | ✓ | |
| 4 | Whether the enactment under which the appeal is filed mentioned? | ✓ | |
| 5 | Whether the enactment under which the appeal is filed is correct? | ✓ | |
| 6 | Whether affidavit is appended? | ✓ | |
| 7 | Whether affidavit is duly attested by competent Oath Commissioner? | ✓ | |
| 8 | Whether appeal/annexures are properly paged? | ✓ | |
| 9 | Whether certificate regarding filing any earlier appeal on the subject, furnished? | ✓ | |
| 10 | Whether annexures are legible? | ✓ | |
| 11 | Whether annexures are attested? | ✓ | |
| 12 | Whether copies of annexures are readable/clear? | ✓ | |
| 13 | Whether copy of appeal is delivered to AG/DAG? | ✓ | |
| 14 | Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents? | ✓ | |
| 15 | Whether numbers of referred cases given are correct? | ✓ | |
| 16 | Whether appeal contains cutting/overwriting? | x | |
| 17 | Whether list of books has been provided at the end of the appeal? | ✓ | |
| 18 | Whether case relate to this court? | ✓ | |
| 19 | Whether requisite number of spare copies attached? | ✓ | |
| 20 | Whether complete spare copy is filed in separate file cover? | ✓ | |
| 21 | Whether addresses of parties given are complete? | ✓ | |
| 22 | Whether index filed? | ✓ | |
| 23 | Whether index is correct? | ✓ | |
| 24 | Whether Security and Process Fee deposited? On | | |
| 25 | Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On | | |
| 26 | Whether copies of comments/reply/rejoinder submitted? On | | |
| 27 | Whether copies of comments/reply/rejoinder provided to opposite party? On | | |

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

Name:

Signature:

Dated:

[Handwritten Signature]

(14)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 77561 2021

SCANNED
KPST
Peshawar

Shahana Hameed ASDEO (F) Establishment office of the
DEO Bannu.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education and others.

(Respondents)

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| 5 | Copy of the Committee documents and expenses detail | B & C | 11-25 |
| 6 | Copy of the First inquiry dated 08.11.2019 | D & E | 26-29 |
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Through

Appellant


ZARTAJ ANWAR

Advocate High Court

Office FR, 3-4 Forth Floor

Bilour Plaza Peshawar Cantt.

Cell: 0331-9399185

Email: Zartaj9@yahoo.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

**Khyber Pakhtunkhwa
Service Tribunal**

Service Appeal No. 7756 / 2021

Diary No. 7881

Dated 15-11-2021

Shahana Hameed ASDEO (F) Establishment office of the
DEO Bannu.

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Khyber road, Peshawar
2. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (F) Bannu.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the impugned order dated 30.06.2021 against which the appellant filed departmental appeal vide dated 15.07.2021, which is still not responded after lapse of 90 days of statutory period.

Prayer in Appeal: -

On acceptance of this appeal the impugned recovery order dated 30.06.2021 may kindly be set aside and may kindly be exonerated from all the false and baseless allegation leveled against the appellant. Any other relief which is not specifically asked may also be granted to the appellant.

Filed to-day
15/11/21
Registrar

Respectfully Submitted:

- 1) That the Appellant currently performing her duties as ASDEO (F) Office at DEO Bannu with great zeal and

devotion and to the entire satisfaction of her superiors without any complaint whatsoever regarding her performance.

- 2) That while performing her duties at GGMS Hayat Mohammad Khel as SST, appellant was transferred to the Government Girls Community Model School Hayat Muhammad Khel Bannu (GGCMS) as headmistress vide office order dated 15.09.2015, where the appellant performed her duties with all her capabilities and become headmistress. *(Copy of the office order dated 15.09.2015 is attached as annexure A)*
- 3) That when the appellant joined her duties in the GGCMS there were an uncompleted construction/repair work started by the previous Headmistress, the appellant has started the construction work and completed the same on the amount which was allocated /sanctioned by the Govt to the GGCMS Hayat Muhammad Khel Bannu, for necessary repair work at school i.e. Boundary Wall, Common Washroom and Water Supply.
- 4) That for this purpose the government transferred the amount to a joint account i.e Parent Teacher Account (PTC) to avoid embezzlement/corruption and also for the proper check and balance.
- 5) That in order to utilized the sanctioned amount for the purpose of necessary repair work the appellant in the light of lay down procedure duly constitute committee of the teachers and elders of the locality i.e. the land owner who provided land to the government for construction of school member of the said committee and whenever any work was done or issued amount to the government contractor that was in consultation of the said committee. *(Copy of the Committee documents and expenses detail are attached as annexure B & C).*
- 6) That the amount sanctioned and allocated for three type of different work in which the amount sanctioned for boundary wall was Rs.627500/-, 160000/- for Common washrooms and 200000/- for Water supply and sanitation, the said amount was spent on the mentioned distributions and the same was acknowledge by the committee as well as the amount issued to the contractor was duly signed by the members of the committee.
- 7) That in the year 2019 one namely Mr. hayat Muhammad who was the owner of the land of the school whose brother been

appointed as Chowkidar on the school and having personal grudges with the appellant which developed later on, file a complaint before the competent authority by leveling false and baseless allegations of corruption and embezzlement for the amount sanctioned for the repair of school in the year 2015, which was duly completed and the complainant was also the member of the committee constituted for the said work and satisfied from the work done.

- 8) That upon the complaint lodge against the appellant an inquiry was initiated, the inquiry officer duly conducted the inquiry while gone through all the available record as well as inspected the work done area i.e. School and recommended the exoneration of appellant from charges leveled against her. *(Copy of the First inquiry dated 08.11.2019 is attached as annexure D & E).*
- 9) That the respondent department without taking into consideration the inquiry conducted upon the order of the competent authority duly constituted and inspected all the work done and given their report but astonishingly rather illegally issued constituted another committee to inquire the matter without giving any reasons that on what point of law need to conduct a second inquiry or on what point of law the authority is not agreed the finding and recommendation of the first inquiry which is against the law and rule on subject matter i.e. E & D Rules 2011. *(Copy of the Second inquiry dated 21.11.2019 is attached as annexure F).*
- 10) That second inquiry which is illegal in the eyes of law on the subject matter and the inquiry officer without taking into consideration the report submitted by the appellant as well as the inquiry report of the first inquiry illegally ordered the recovery of amount spent on the developmental work and which did not mentioned any specific amount.
- 11) That the respondent department in the light of the second inquiry issued the recovery order dated 30.06.2021 upon which the appellant has submitted his departmental appeal vide dated 15.07.2021, which is till date not responded. *(Copy of the order dated 30.06.2021 and departmental appeal are attached as annexure G & H).*
- 12) That being aggrieved from the impugned order dated 30.06.2021, the appellant has filed this appeal on the following grounds inter alia.

GROUND OF SERVICE APPEAL:

- A. That the Appellant has not been treated in accordance with law, her rights secured and guaranteed under the law and Constitution has been violated.
- B. That the respondents are not acting in accordance with law and not treating the Appellant alike.
- C. That the conduct of the respondents is apparently tainted with malice, malafide and bias, and importantly based on personal grudges
- D. That an inquiry was initiated, the inquiry officer duly conducted the inquiry while gone through all the available record as well as inspected the work done area i.e. School and recommended the exoneration of appellant from charges leveled against her.
- E. That the respondent department without taking into consideration the inquiry conducted upon the order of the competent authority duly constituted and inspected all the work done and given their report but astonishingly rather illegally issued constituted another committee to inquire the matter without giving any reasons that on what point of law need to conduct a second inquiry or on what point of law the authority is not agreed the finding and recommendation of the first inquiry which is against the law and rule on subject matter i.e. E & D Rules 2011.
- F. That second inquiry which is illegal in the eyes of law on the subject matter and the inquiry officer without taking into consideration the report submitted by the appellant as well as the inquiry report of the first inquiry illegally ordered the recovery of amount spent on the developmental work and which did not mentioned any specific amount.
- G. That the respondent department in the light of the second inquiry issued the recovery order dated 30.06.2021, which is illegal, unlawful and against the law and violative upon the rights of the appellant.
- H. That the Appellant has not been treated as per notified gazetted rules by the respondents which deprived the Appellant from her due right of her due seniority.

- I. That the Appellant has at her credit the spot less service career and the appellant spent the amount after consultation with members of the committee.
- J. That inaction on the part of respondents is adversely affecting the Appellant career of the appellant and has not treated according to law
- K. That the Appellant seeks the permission of this honourable Tribunal to rely on additional grounds at the hearing of this Appeal.

It is, therefore, humbly prayed that on acceptance of this appeal the impugned recovery order dated 30.06.2021 may kindly be set aside and may kindly be exonerated from all the false and baseless allegation leveled against the appellant. Any other relief which is not specifically asked may also be granted to the appellant.

Shahana Hameed
Appellant

Through

Zartaj Anwar
ZARTAJ ANWAR

Advocate Peshawar

Imran Khan
&

IMRAN KHAN

Advocate Peshawar

AFFIDAVIT

I, Shahana Hameed ASDEO (F) Establishment office of the DEO Bannu, do hereby solemnly affirm and declare on oath that the contents of the above appeal are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal.



Shahana Hameed
Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ / 2021

Shahana Hameed ASDEO (F) Establishment office of the
DEO Bannu.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education and others.

(Respondents)

ADDRESSES OF PARTIES

Appellant

Shahana Hameed ASDEO (F) Establishment office of the
DEO Bannu.

Respondents

1. Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education, Civil Secretariat Khyber
road, Peshawar
2. Director, Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar.
3. District Education Officer (F) Bannu.


Appellant

Through



ZARTAJ ANWAR
Advocate Peshawar

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____ / 2021

Shahana Hameed ASDEO (F) Establishment office of the
DEO Bannu.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education and others.

(Respondents)

APPLICATION FOR SUSPENSION OF ORDER DATED
30.06.2021, TILL THE FINAL DECISION OF THE
TITLED SERVICE APPEAL.

Respectfully Submitted:

1. That the above titled service appeal is pending adjudication before this Honorable Tribunal in which no date of hearing is fixed.
2. That the facts and grounds taken in the titled service appeal may kindly be taken as integral part of the instant application.
3. That the respondents have issued recovery of amount vide notice dated 30.06.2021.
4. That the applicant has a good prima facie case in her favor and she is sanguine of its success. So all the three ingredients/ pre-requisites for the grant of status quo strongly lies in favor of the applicant.
5. That the applicant would be exposed to great hardship and inconvenience in case if order dated 30.06.2021 is not suspended.
6. That it would also serve the interest of justice if the respondents are restrained from making recoveries of the alleged amount from applicant, till the final decision of the titled service appeal.

It is, therefore, humbly prayed that on acceptance of this application the order dated 30.06.2021 may kindly be suspended and the respondent may kindly be stopped from making

recovery of alleged amount till the final decision of the titled service appeal.

[Signature]
Applicant

Through

[Signature]

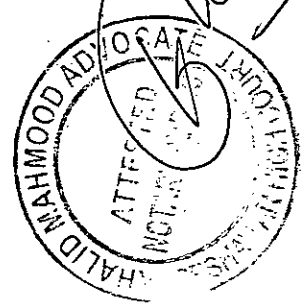
ZARTAJ ANWAR
Advocate Peshawar

& *[Signature]*

IMRAN KHAN
Advocate Peshawar

AFFIDAVIT

I, Shahana Hameed ASDEO (F) Establishment office of the DEO Bannu, 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.



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[Signature]
Deponent



Govt of Khyber Pakhtunkhwa
Office of the Distt; Education Officer (Female)
E & SE Bannu. Phone: & Fax; 0928-660019

ORDER

The Mutual transfer/adjustment of the following SST Teachers is hereby ordered in the interest of public service with immediate effect,

| S.No | Name of Teacher | From | To | Remarks |
|------|--------------------------|---------------------------------|---------------------------------|----------|
| 1. | Mst: Shalna Hameed (SST) | GGMS Hayat Mohammad Khel. | GGCMS Hayat Muhammad khel Bannu | V.S.No.2 |
| 2 | Mst: Gul Shareen SST | GGCMS Hayat Muhammad khel Bannu | GGMS Hayat Mohammad Khel. | V.S.No.1 |

Note;

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

Distt; Education Officer (F)
Bannu

Endst No 6937-33 DEO (F)

Dated; 15/03/2015

Copy to the;

1. Headmistress concerned.
2. District Accounts Office Bannu.
3. Teacher concerned.

Distt; Education Officer (F)
Bannu

ATTESTED

GGMS حیات محمد علی خاں
مہنت کی ایک (PTA)
بابت ماہ اکتوبر 2015

مہنت کا آغاز تلاوت ملام باں سے
کے لیے

سید محمد انجمین سے 5 مہران
حاضر بنی

اکتوبر 2015 میں GGMS سے سروس
فہرہ میں ایک لاکھ روپے (100000) آئے
ایجنسیوں اور کمیٹی کے ارکان نے حکومت کا شکریہ ادا کیا
سید محمد انجمین
سید محمد انجمین
مہنت

GGMS حیات خان

5/10/2015

دبران گلہ (مہنت) نائبہ انجمین

حلالہ (مہنت)

ATTESTED

بخدمت جناب ڈی ای او صاحبہ زمانہ مدارس منگلے بنوں

جناب عالیہ! گزارشی ہے کہ بلے اسٹیو کی مدرسے

گو ریفٹ گزار پیرامی کی پونی ساڈل سکول کو

میں جسیر پیرس پمپدرہ زوہد حیات خان اور لیلیٰ بی بی

بہٹی کے ممبران کی مرضی سے پیرا فم حیات خان کو دی گئی

اور اس نے پیرا فم اسٹوپی سے کرنے کا وعدہ کیا ہے

۱ منگی بار (۲) سوئنگ جھوٹے (۳) سلائیڈ (۴) سٹی پیرا

دستخط و مہولی رقم
حیات خان

16/4/2016

دستخط گوانان
Head Master
GGM Master Muhammad Nafi
Bannu

گال شریں پمپدرہ کی مرضی سے حیات خان

پمپدرہ جسیر پیرس

شایا نہمید آکا

16/4/2016

CAMERA

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| | |
|----|---------------------|
| 16 | 11 $\frac{04}{016}$ |
|----|---------------------|

120000/- نقد 16 $\frac{4}{016}$ کو فی بی سی چھریں پر پیسہ
 نے اپنے شوہر حیات خان کو دے تاکہ چھریوں

کا ادرا دے سکیں

سرخا و مول لکھنؤ

شہاب احمد سی

پیسہ فی بی سی چھریں پر

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زور حیات خان

Handwritten date: 16/4/91

Secretary / Chairman P.D.C.
 Mayat ul Jamaat

ATTESTED

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27
13 April 2016

Play area
گورنمنٹ پرائمری سکول
صیانت فرم حاصل

تاریخ خرید - رقم - قیمت
16/4/016 120000/-

تفصیلی اہلیت

2 swings, monkey bars, 20/4/016
slides, see saw

20/4/2016
G.G.S.M.S.
16

ATTESTED

| تاریخ | تفصیل آمدن | ریٹرن | رقم | مکان | تاریخ | مکان | رقم | ریٹرن | تفصیل آمدن | تاریخ |
|-------|------------|-------|-----|--------------------|---------------|------|-----|-------|------------|-------|
| | | 1 | | تفصیل خرچ | 2024 15/11 | مکان | | | | |
| | | | | also MonKeshwar | | | | | | |
| | | | | See G.M. account | | | | | | |
| | | | | کراچی اور قسطنطنیہ | | | | | | |
| | | | | راکھو کرالہ | | | | | | |
| | | | | (مستحق) | | | | | | |
| | | | | تفصیل آمدن | | | | | | |
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Misra

Head Mistress
 GGP
 Hayat Mohad Khel
 Bahawalpur

ATTESTED

مکمل / گھنٹہ لاپک

یہ کارڈ کیفیت کے لیے ہے جب کہ اس پر غور سے نہ دیکھا جائے تو اس کا
 فوائد اور نفع کے لحاظ سے خاص کر جاننے والے اس کو کس اور پتہ پتہ جانے

| نام اشیا | وزن | ادارہ | کی قیمت | کل قیمت | باز |
|-----------------|-----|-------|---------|---------|-----|
| 14 فلورینج ہرنٹ | | | | | |
| آفیس | | | | | |
| Morning | | | | | |
| Saw Sution | | | | | |
| شیرین / سائبر | | | | | |
| فیس | | | | | |
| سیرین + ک | | | | | |

16

26/1/01

| مردم | رقم | تعداد | تفصیل | تاریخ | مکان | رقم | تعداد | تفصیل | تاریخ |
|-------|---------|-------|----------------------------------|---------|------|-------|-------|-------|---------|
| 2000 | 2000/1 | 3 | Head Mistress G.P.C.M. School | 18/8/11 | 3500 | 3500 | 5 | 3/4 | 31/8/11 |
| 45000 | 45000/1 | 3 | | 18/8/11 | 4500 | 4500 | 3 | 3/4 | |
| 2000 | 2000/1 | 4 | | 18/8/11 | 3200 | 13070 | 12 | 3/4 | |
| 2000 | 2000/1 | 3 | | 18/8/11 | 3500 | 3500 | 5 | 3/4 | |
| 45000 | 45000/1 | 3 | | 18/8/11 | 4500 | 4500 | 3 | 3/4 | |
| 2000 | 2000/1 | 4 | | 18/8/11 | 3200 | 13070 | 12 | 3/4 | |

TESTED

190001-2

| ادائیگی | | | | وصول | | | |
|---------|------|----------|-----------------|---------|-------|-----|----------|
| میزان | رقم | رید نمبر | تفصیل خرچ | تاریخ | میزان | رقم | رید نمبر |
| 6420 | 6420 | 6 | لوہے (سینڈ) خرچ | 15-8-06 | | | |
| | | | 535 | | | | |
| 999 | 999 | | پاشپا اور سٹا | ✓ | | | |
| 6500 | 6500 | | سیریا سیرف | ✓ | | | |
| 360 | 360 | | پاؤڈر | ✓ | | | |
| 500 | 500 | | کیرا | ✓ | | | |
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| | | 14702 | 14702 | | | | |
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Head Mistress
G.G.P.C.M. School
Hayat Mohammad Khel
Bannu

ATTESTED

22/5/16

بیت

کیش بک 19

بیت کیش بک

اداری

وصول

| میزان | رقم | تفصیل | تاریخ | میزان | رقم | تفصیل | تاریخ |
|-------|------|-------|---------|---------------------|------|-------|---------|
| 4500 | 150 | 12 | 23-5-16 | 2390 | 2390 | 2 | 23-5-16 |
| 240 | 20 | | | | | | |
| 300 | 150 | | | | | | |
| 150 | 150 | | | | | | |
| 30 | 30 | | | | | | |
| 500 | 50 | | | | | | |
| 10 | 20 | | | | | | |
| 8500 | 6500 | | | | | | |
| 750 | 150 | | | | | | |
| 2000 | 200 | | | | | | |
| 100 | 50 | | | | | | |
| 5500 | 250 | | | | | | |
| | | | | $\frac{2390}{2390}$ | | | |

176108

Head Mistress
G.G.P.C. School
Havri

Signature

31/12/2016

بھارت

کیش بک

کیش بک

الائی

تفصیلات

حصات

م

ریسیٹر

تفصیلات

تاریخ

| مکان | تاریخ | ریسیٹر | تفصیلات | تاریخ | مکان | م | ریسیٹر | تفصیلات | تاریخ |
|------|-------|--------|---------|-------|------|---|--------|---------|-------|
| 700 | 350 | 8 | لائی | | | | | | |
| 190 | 101- | | فٹ | | | | | | |
| 200 | 901- | | سینئر | | | | | | |
| 50 | 501- | | ی | | | | | | |
| 160 | 1601- | | ی | | | | | | |
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ATTESTED

Head/Mistress
GGPS School
30.12.16

35

21
کیش تک

2020/01/10

بصافہ

پیشہ

الاجلی

وصولی 11 ضلع اور ضلع 8

| مزان | رقم | ریسیٹر | تفصیل | تاریخ | مزان | رقم | ریسیٹر | تفصیل | تاریخ |
|-------|-------|--------|-------|-------|------|-----|--------|-------|-------|
| 13005 | 13005 | T | 25 | 2016 | | | | | |
| 6000 | 6000 | | 1200 | | | | | | |
| 6000 | 6000 | | 1200 | | | | | | |
| 8000 | 8000 | | 1200 | | | | | | |
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ATTESTED

Attest Mistress
G.G.P.C. of
Hawra Mohi
Bannu

36
 22
 كيش بلك
 بانيه

مدرسة كيش بلك
 كيش بلك

| اسم | اداري | تفصيل | تاريخ | ميزان | م | ميزان | تفصيل | تاريخ |
|-------|-------|-------------|-----------|-------|-------|-------|-------|-----------|
| ميزان | م | ميزان | 21/8/2016 | 700 | 700 | 5 | م | 21/8/2016 |
| 1000 | 1000 | 1000 (1000) | ✓ | 1800 | 1800 | 1000 | م | 1000 |
| 1335 | 1335 | 1335 (1335) | ✓ | 4000 | 4000 | 1500 | م | 4000 |
| 1500 | 1500 | 1500 (1500) | ✓ | 14325 | 14325 | 14325 | م | 14325 |

Head Mistress
 G.P.C.M. School
 Bannu

1. 100000/- (100000/-) 100000/-
 2. 100000/- (100000/-) 100000/-
 3. 100000/- (100000/-) 100000/-

| Account Name | Debit | Credit | Balance |
|--------------|-------|----------|----------|
| 100000/- | | 100000/- | 100000/- |
| 100000/- | | 100000/- | 100000/- |
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100000/- (100000/-) 100000/-
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| Account Name | Debit | Credit | Balance |
|--------------|-------|----------|----------|
| 100000/- | | 100000/- | 100000/- |
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Secretary (Charter) P.T.A
 G.O.S. Hospital, P.O. 24, K.M.I.
 Sec-4

25-10-2015

| رقم | ملاحظات | عدد |
|-----|---------|-----|
| 1 | 10000/- | 1 |
| 2 | 16800/- | 2 |
| 3 | 12000/- | 3 |
| 4 | 15000/- | 4 |
| 5 | 14000/- | 5 |
| 6 | 8400/- | 6 |
| 7 | 11000/- | 7 |
| 8 | 42000/- | 8 |
| 9 | 38000/- | 9 |
| 10 | 78000/- | 10 |
| 11 | 18000/- | 11 |
| 12 | 16500/- | 12 |
| 13 | 24000/- | 13 |
| 14 | 12000/- | 14 |
| 15 | 19000/- | 15 |

62600/-

POSTED

39
 25.10.2015

100000/-
 100000/-
 100000/-

| Price | Item | Quantity | Description | Count |
|----------|-----------|----------|-------------|-------|
| 100000/- | 100000/- | 1 | 100000/- | 1 |
| 18000/- | 165000/- | 1 | 165000/- | 1 |
| 17000 | 2000/- | - | 2000/- | 2 |
| 96000/- | 12000 x 8 | 8 | 12000 x 8 | 3 |
| 147000/- | 15000 x 8 | 8 | 15000 x 8 | 9 |
| 64000/- | 15000 x 4 | 4 | 15000 x 4 | 5 |
| 170000/- | 4800 x 10 | 10 | 4800 x 10 | 6 |
| 12000/- | 3500 x 2 | 2 | 3500 x 2 | 7 |
| 42000/- | 14000 x 3 | 3 | 14000 x 3 | 8 |
| 38000/- | 9500 x 4 | 4 | 9500 x 4 | 9 |
| 78000/- | 6500 x 12 | 12 | 6500 x 12 | 10 |
| 18000/- | 1500 x 12 | 12 | 1500 x 12 | 11 |
| 16500/- | 1400 x 12 | 12 | 1400 x 12 | 12 |
| 24600/- | 2000 x 12 | 12 | 2000 x 12 | 13 |
| 12000/- | 1000 x 12 | 12 | 1000 x 12 | 14 |
| 19000/- | 9500 x 2 | 2 | 9500 x 2 | 15 |

62600/-

ATTESSTE

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26

ANNEX 'D'

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) TANK



Dated Tank the 26/06/2015

INQUIRY REPORT

At Tank, 11

Reference to the Deputy Director (D-2) ESSE Khyber Pakhtunkhwa No. 1000/2015 regarding nomination & inquiry

FACTS OF CASE

Reference to the fact that the G.C.M.S. Hayat Muhammad Khel Bannu on 10 & 11 June 2015, reported about the irregularities of financial embezzlements

Mrs. Gul Sherin Ex Head Mistress G.C.M.S. Hayat Muhammad Khel Bannu
Mrs. Gul Sherin Head Mistress G.C.M.S. Hayat Muhammad Khel Bannu

FINDINGS OF INQUIRY

1. On the basis of bank statements, credited / debit record of PIA G.C.M.S. Hayat Muhammad Khel Bannu Account No. 4044766250 & Account No. 4083816817 maintaining at National Bank of Pakistan. A Total Sum of Rs 1673930/- (Rupees Sixteen Lacs, Seventy Three Thousand, Nine Hundred & Thirty Only) has been allocated for the provision of various facilities in the said School.

2. In the written statement of Mst. Gul Sherin Ex Headmistress G.C.M.S. Hayat Muhammad Khel Bannu she stated that while she posted at the said School served well from 11 June 2015 to 15 June 2015, received the following funds, which were utilized through the expenditure of School within the following breakup.

- a) She stated that Rs. 200000/- (Rupees Two Lacs) has been withdrawn on 17th June 2015 and utilized for provision of W/Supply
- b) She stated that Rs. 160000/- (Rupees One Lac & Sixty Thousand) has been withdrawn on 20 June 2015 and utilized for the provision of G/Latrine.
- c) She stated that Rs 647000/- was allocated for the reconstruction / uprising of B/Wall. She further added that the excess amount after uprising of B/Wall was spent on installation of Barbed wire, repaired roof of rooms, then constructed

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D-2

ground floor of Verandah, one bulwark for Chowkidar, colored and decorate the School through panaflexes, some amount remaining from the W/Supply was spent on installation of new water pipes, digging of water draw-well along with constructed water Tank.

- d) She further added that, She has been transferred from the GCCMS Hayat Muhammad Khel vide DEO (F) Bannu Order Endst: No. 6937-39 Dated 15-09-2015.
- 3 According to the written statement of DEO (F) Bannu and Mst. Shalana Hameed Ex Headmistress GCCMS Hayat Muhammad Khel & perusal of connected documents, the said Headmistress join the GCCMS Hayat Muhammad Khel later on 15-09-2015 and the remaining amount is utilized in her tenure.
- 1 Mr. Hayat Muhammad Khan Chowkidar of said School has stated that the allocated amount was utilized through his consent and he has no objection on the utilized funds in GCCMS Hayat Muhammad Khel Bannu.

RECOMMENDATIONS:

In the light of above detail report, perusal of available record and ongoing through the statements of parties / physical checking of available missing facilities in GCCMS Hayat Muhammad Khel, the Enquiry Officer is of humble view that the complaint moved against financial embezzlement in said School does not supported by the available utilization record and physical work done thereat.

It is therefore requested that the instant complaint being of baseless nature may please be filed without any further process.



District Education Officer
(Male) Tank

Enstt. No. 7052 /

Copy to the:-

- 1 Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to the above.



District Education Officer
(Male) Tank

رپورٹ کی روشنی میں سکول
انتھارٹی نے جو کارروائی کی

راجہ / رپورٹ معائنہ

visit report

visited the GGMSEA
GCMs. Hayat Muhammed Khal
Bannu today on 29/07/2019
& checked the developmental
works done upto date.
Receipts of the work done were
thoroughly checked, 05 (five)
number of Group latrine
were rehabilitated, roofs
of both primary & Middle
section rooms were repaired
& floors of five rooms & WCs
& veranda were also repaired
& major portion of the yard
was found repaired, the
allegations levelled against
the school authorities were
found baseless.

~~ATTACHED~~

47

43

(حصہ دوم)

لاگ بک 29

رپورٹ کی روشنی میں سکول
انتظامیہ نے جو کارروائی کی۔

رائے / رپورٹ معائنہ

As far as the role of Mst Shirena
EX HIA of the Middle Section
is concerned, she is innocent
as PTC was well functional
& she had minute role
in the developmental works
as per local traditions.

29.07.2019
Deo (F/M)
District Education Office
(Female) Bannu

ATTESTED

94

30

اس میں ایس ایف کے

ANNEX "F"



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
KARAK

Phone: 0927-291177
Address :KDA Karak
Email:dcof emalckarak@yahoo.co

No. 07

Dated Tank the: - 21 / 11 / 2019

To

The Director E&SE Department
Khyber Pakhtunkhwa, Peshawar.

Subject:-

ENQUIRY REPORT

Memo.

Reference to your letter No. 1849-51/A-12/Complaint/Vol-15 A dated Peshawar the: 22-10-2019. Enclosed find here with Enquiry report consists of (04) pages along-with supporting documents (17 pages) for further necessary process as desired please.

Enclose: (As above).

Shazla Nawaz
DDEO (F) Karak / Enquiry Officer.

ATTESTED

45
31

| | | | |
|---|--------------------------------|-----------|---------|
| 5 | Group latrine+ Electrification | 180000/- | |
| | Total Amount released | 1287500/- | 2015-16 |

| GGMS HAYAT MUHAMMAD KHEL BANNU | | | |
|--------------------------------|--------------------------|-----------------------------|---------|
| S.No | Name of Facility | Amount released PTC Account | Year |
| 1 | Raising of Boundary Wall | 100000/- | 2014-15 |
| 2 | Purchase of Sports Gears | 10000/- | 2014-15 |
| 3 | Furniture Repair | 60000/- | 2015-16 |
| | Total Amount released | 260000/- | |

1. GGMS HAYAT MUHAMMAD KHEL BANNU.

Mst Gul Shareen SST Head Mistress GGMS Hayat Muhammad Khel Bannu has been Secretary of PTC since 01-11-2014 to 14-11-2015. She has drawn and utilized Rs. 987000/- . In her statement she verified the allocation of funds for the facilities mentioned above. The work done against the funds allocated, released and drawn was properly examined. It was found that Rs. 627500/- utilized for raising of boundary wall with barbed wire on its top, construction of security point, white wash and minor repair of the building as stated by the head mistress and secretary PTC are justified. However the funds allocated for the Group Latrine Rs. 160000 has not been utilized and thus no lavatory has been constructed. As for as the funds allocated for water supply concerned, some pipe lining has been made and approximately 1/3 (70000) of the total released amount has been utilized. while the rest of the amount Rs.130000/- cannot be justified by the accused.

According to the statement of the accused the funds allocated for Group Latrine have been utilized on the repair of old lavatories in stead of construction new ones. She further stated that one old type of well already existed in the school was excavated and pipe lines were made, utilizing Rs. 200000/- for this purpose. However her statement is not reasonable and justifiable. She further stated that the work has been done by the land owner. However she could not provide any proof of work assigned or payment made to the land owner. (Annex C P 7-10)

Hence Rs. 130000 + 160000 total 290000/- has been misused by the accused Mst Gul Shareen with huge loss to the public exchequer. The accused also provided the Vouchers of utilization of funds on irrelevant items of stationary, purchase of miscellaneous and class consumable items. It is worth mentioning that funds for all such items has been allocated through regular PTC funds other than the conditional grant. The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate.

Mst: Shahna Hameed ADED Estb: has exercised her authority as secretary PTC of this school though she had not been working in this school and her attendance could not be verified in this school. She had been at the office of the SDEO working as ASDEO since her appointment as SST at GGMS Hayat

ATTESTED

Muhammad Khel Bannu. However she had been exercised the power of secretary PTC of this school illegally and unlawfully.

She has drawn Rs. 300000/- from the PTC account of this school allocated for play area, group latrine and electrification (120000, 160000, 20000). In her statement she refused to have exercised authority as secretary PTC or drawn any amount. (Annex D P 11-12)

The work done under these facilities was examined and it was found that only 120000 has been utilized under play area while the rest of amount of Rs. 180000 drawn by Mst: shahna ASDEO has not been utilized. However she has managed to produce fake vouchers for utilization of the same amount signed by a teacher being her subordinate but irrelevant and unauthorized to utilize the same amount, which is gross inefficiency and violation of financial procedure on the part of the accused. In her written statement she also admitted that she had not been working at any school since 01-09-2014 till date and has been working as ASDEO in the office of the SDEO and DEO till date.

Hence it is clear that she being ASDEO has misused her authority by drawing Rs. 300000/- from the PTC account of GGMS Hayat Muhammad Khel Bannu and also misusing Rs. 180000. The chairperson of PTC denied her signature on the cheque as well as on the vouchers. (Annex E P 13-14) The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate.

2. GGMS HAYAT MUHAMMAD KHEL BANNU.

As per available record and bank Statement for the Year 2014-15 and 2015-16 Rs. 260000 has been credited to the PTC Account GGMS Hayat Muhammad Khel (Rs. 100000 for barbed-wire on boundary wall, Rs. 100000 for Purchase of sports gears and Rs. 60000 for furniture repair.) However Rs. 100000/- for Boundary wall and Rs. 100000/- for sports drawn by Mst: Shahana Hamid and has not been properly utilized. Rs. 60000/- for furniture repair drawn by Mst Gul Shareen and has not been properly utilized. All the amount Rs. 260000/- has not been properly utilized. However the accused produced some irrelevant vouchers showing utilization of the said amount, which are not reasonable and could not be justified. The chairperson of PTC denied her signature on the cheque as well as on the vouchers. The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate. Vouchers are available showing all the funds utilized but neither sports gears are purchased nor furniture has been repaired.

Hence it is clear that all the amount Rs. 260000/- has been misused by the accused with huge loss to the public exchequer. (Annex F 15-17)

NDINGS:

In view of the above narrated facts, perusal of available office record and physical examination the work done under PTC in both the schools i.e GGMS Hayat Muhammad Khel Bannu and GGMS Hayat Muhammad Khel Bannu running in the same building has come to the conclusion that:

1. Rs. 390000/- has been misused by the accused Mst Gul Shareen Ex- Head Mistress GCMS and GGMS Hayat Muhammad Khel Bannu which are recoverable.

~~ATTESTED~~


380000/- has been misused by Mst Shahana Hameed ASDEO establishment O/O DEO (Female) Bannu she has also been misused her authority and violated the financial procedure.

Hence all the amount used illegally and unlawfully needs to be recovered from the accused and both of them are liable to be proceeded against for their inefficiency, violation of financial procedure and corruption which are tantamount to misconduct.

RECOMMENDATIONS:

It is hereby recommended that:

1. All the amount illegally drawn and utilized may be recovered from both the accused.
2. Both the accused may be proceeded against under rule 3 and 4 of Khyber Pakhtunkhwa Govt. Servant E&D rules 2011.
3. Mst. Shahana Hameed being an employee of teaching cadre may be adjusted at any school as she has been found misfit for administration or office duties.



Shazia Nawaz
DDEO (F) Karak/Enquiry Officer.



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ANNEX "G"

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BANNU.

NO. 3679-811Dated Bannu the 30/06/2021

TO,

- 1- Principal, GGSS NO.2. Bannu City.
- 2- Headmistress, Bada Mir Abbas

Subject: - RECOVERY IN RESPECT OF MST: GUL SHREEN SST (EX: HM) GGMS HAYAT MUHAMMAD KHEL & MST: SHAHANA Hamid EX: ADEO (ESTAB) O/O DEO (FEMALE) BANNU.

Memo:-

Reference Directorate of E & SE Khyber Pakhtunkhwa Peshawar

Notification Endst: NO. 2114-19 and 2108-13 Dated 02/09/2020.

It is stated for your kind information that may please be start recovery from her salaries, of the above subject teachers i.e. Gul Shreen SST (Ex: HM) GGMS Hayat Muhammad Khel & Mst: Shahana Hamid (Ex: ADEO Establishment) of this office, detail of recovery are as under.

- 1- Mst: Gul Shreen SST. Rs, 390000
- 2- Mst: Shahana Hamid SST. Rs, 380000

Copy of Pay Slips of the concerned teachers, & initiation of your disciplinary action may reached to the undersigned office in five days positively.

Sunway
District Education Officer,
(Female) Bannu.

Endst: NO. _____ / Dated Bannu the _____ /2021.

Copy for information to the:-

- 1- Director of Elementary and Secondary Education KPK Peshawar.

Sil
District Education Officer,
(Female) Bannu.

~~ATTESTED~~

بخدمت جناب DEO(F) زنانہ مدارس ضلع بنوں

تھروپراپر چینل

عنوان : دفاع بابت ریکوری

جناب عالی :-

بادب گزارش ہے کہ بذریعہ وائس ایپ لیٹر نمبر 81-3679 مورخہ 30-06-2021 آپ کو وصول ہوا جسکے بارے میں چند تفصیلات آپ کے علم میں لانا چاہتی ہوں۔

جناب عالی :-

سائلہ کی کمپلینٹ اور ڈائریکٹریٹ E&SE کے فیصلہ روشنی میں سائلہ نے سول سرونٹ رولز کے تحت سیکرٹری E&SE کو ذیچ نمبر 1877 اور 1878 مورخہ 28-05-2021 کو اپیل جمع کروائی اور ان لیٹرز کی اطلاع ڈائری نمبر 714 اور 715 مورخہ 29-05-2021 اور دوبارہ ڈائری نمبر 1832 اور 1833 مورخہ 14-06-2021 کو DEO(F) بنوں کو دی گئی۔

اس سے پہلے ڈائریکٹریٹ E&SE کو بھی اپیل کی گئی مگر انہوں نے جواب نہیں دیا اور ابھی بھی سیکرٹری E&SE کی طرف سے جواب موصول نہیں ہوا جبکہ اپیل جمع ہونے میں 90 دن کی معیاد مقرر ہے اور ابھی صرف 33 دن ہوئے ہیں اسی لئے آپ سے گزارش ہے کہ مندرجہ بالا معیاد کو پورا ہونے تک کسی قسم کی تاخیر کا رروائی نہ کی جائے امید ہے کہ ہماری گزارش پر غور کیا جائے گا اور ہمیں شکریہ کا موقع دیا جائیگا۔

Ms. S. S. S. S. S.
مسماة شاہانہ حمید

گورنمنٹ گرلز ہائی سکول بڈامیر عباس

ATTESTED

15/7/2021.

G/GCMS / G/GMS Hoyal Multinational Khe Detail of PTC Pun

| | WIS | G/2 | B/W | ACR | E/lec | sports | F and F | play area |
|---------|--------|---------|-----------------|-----|--------|--------|---------|-----------|
| 2014-15 | 200000 | 160,000 | 627500+ memo | — | — | 100000 | 60,000 | 120,000 |
| 2015-16 | — | 160,000 | — | — | 20,000 | — | — | — |
| 2016-17 | — | — | — | — | — | — | — | — |
| 2017-18 | — | — | — | — | — | — | — | — |
| 2018-19 | — | — | — | — | — | — | — | — |
| Total | 200000 | 320,000 | 727500 | — | 20,000 | — | 60,000 | 120,000 |

G/Tota
144750

15/11/2019
H O E O (P O)
G S S (E) G S S

ATTESTED

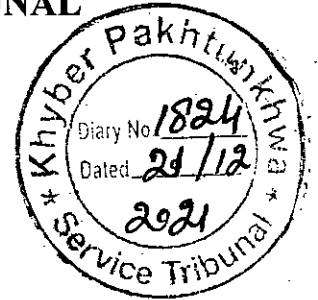
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07/01

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 2756/2021



Shahana Hameed ASDEO (F) Establishment office of the DEO
Bannu.

Put up to the worthy chair-man
with relevant appals.

(Appellant)

VERSUS

[Handwritten signature]

Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education and others.

[Handwritten signature]

(Respondents)

**APPLICATION FOR FIXATION OF AN EARLY
DATE OF HEARING IN ABOVE TITLED APPEAL.**

Respectfully Sheweth:

1. That above noted case in pending adjudication before this Hon;able court, in which next date of hearing is 07.01.2022.
2. That the applicant has filed appeal before this honourable tribunal against the impugned order 30.06.2020, whereby the respondent department issued the recovery order from the applicant, which is illegal unlawful and against the law.
3. That the applicant also filed an application for the suspension of recovery order. The respondents intend to start the recovery from the salaries of the applicant therefore need early fixation of the above noted appeal.
4. If an early date of hearing is not fixed in the above noted case the applicant will face financial lost as well as mental.
5. That there is no bar on early date of hearing fixation, therefore need early fixation for the larger interest of justice.

It is, therefore, prayed that on acceptance of this application, the titled appeal may kindly be fixed as early as Possible for the larger interest of justice.

Applicant
Through *Zartaj Anwar*
ZARTAJ ANWAR
Advocate High Court

AFFIDAVIT

I, Gul Shereen SST (G) at Government Girls Community Model School Hayat Muhammad Khel Bannu., do hereby solemnly affirm and declare on oath that contents of the accompanied application are true and correct to the best my knowledge and belief.

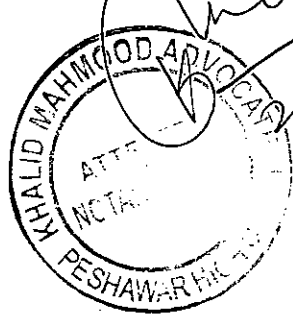
Identified by

Zartaj Anwar
ZARTAJ ANWAR
Advocate High Court

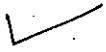
Gul Shereen

DEPONENT

CNIC No.

Zartaj Anwar
12-21


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

SCANNED
KPST
Peshawar

Service Appeal No: 7756/2021

9/10/23

Mst. Shahana Samad District Bannu.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa through the Secretary E&SE
Department & others..... Respondents

INDEX SHEET

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| 1. | Joint Para Wise Comments along with affidavit | - | 1-4 |
| 2. | Copy of the Show Cause Notice Dated 13-08-2021 | A | 5 |
| 3. | Copy of the letter Dated 21-11-2019 | B | 6 |
| 4 | Copy of the enquiry report dated 21-11-2019. | C | 7-10 |
| 5 | Copy of the Order & Notification Dated 30-06-2021 & 02-09-2020 | D & E | 11,12 |

[Signature]
Assistant Director (Lit: II)
E&SE Department, Khyber
Pakhtunkhwa, Peshawar.

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**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

**SCANNED
KPST
Peshawar**

Service Appeal No: 7756/2021

Shahana Hameed, ASDEO (F) Establishment office of the District
Bannu.....Appellant.

9/10/23

VERSUS

Government of Khyber Pakhtunkhwa through the Secretary E&SE Khyber Pakhtunkhwa &
others.....**Respondents.**

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth :-

The Respondents submit as under:-

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 8199

Dated 09/10/23

PRELIMINARY OBJECTIONS.

1. That the appellant has got no cause of action /locus standi.
2. That the appellant is not an aggrieved person within the meaning of Article-212 of the constitution of Islamic Republic of Pakistan.
3. That the appellant has concealed material facts from this Honorable Tribunal.
4. That the appellant has not come to this Honorable Tribunal with clean hands rather the instant appeal is based on malafide intention for legal cover of her corruption of PTC Funds during her posting as Head Master in District Bannu.
5. That the matter in hand is bad by law & limitation, hence the impugned order dated 30-06-2021 has got finality against the appellant.
6. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
7. That all codal formalities including show cause Notice & formal inquiry vide order dated 21-11-2019 has been observed & conducted by the Department.
8. That the appellant is liable to pay & deposit the embezzled amount of Rs. 390000/- as per finding & recommendation of the inquiry committee imposed in view of rules-4 (a) (I) and (III) of E&D Rules 2011 vide Notification dated 02-09-2020 by the Department.
9. That the appellant has been found guilty of misconduct & financial corruption under the provision of Rules-3 (b) & (c) of the Rules under reference.
10. That the titled appeal is not maintainable in its present form with further contention that no Departmental appeal against the order dated 30-06-2021 has been filed by the appellant to the competent authority.

ON FACTS

- 1) That Para-1 is incorrect on the ground that the appellant is working in the Department against the SST in BPS-16 Teaching Cadre post & has been adjusted against the ADEO (F) in the office of the Respondent No.3 on stop gap arrangement till the arrival of an officer of Management Cadre to the Department.

- 2 That Para-2 is correct that vide Notification dated 15-09-2015, the services of the appellant were placed against the HM post at GGCMS Hayat Mohammad Khel Bannu under the relevant Law & Rules by the Department.
- 3 That Para-3 is incorrect & denied on the grounds that she has been proceeded under the E&D Rules 2011 on charges of corruption in the PTC School Fund in response to the complaint made by Hayat Khan Son of Khazanat Khan District Bannu which was resulted into inquiry against the appellant along with a show cause notice dated 13-08-2021 with the attached as *Annexure-A* for ready reference.
- 4 That Para-4 is pertains to the Bank record, wherein, a joint account of PTC Fund has been open by the appellant but no check Book or reference/particulars of the bank has been mentioned by the appellant just to avoid embezzlement as mentioned in the show cause notice dated 13-08-2021.
- 5 That Para-5 is also incorrect & denied on the grounds that the appellant has been found guilty of corruption to the tune of Rs. 390000/- in the PTC Fund allocated by the Govt; for the said School, therefore, a formal inquiry was conducted vide Notification dated 22-10-2019 by the Respondent No. 2 through Miss Shazia Nawaz Deputy District Education Officer (F) Tank, who submitted her inquiry report vide her office letter No. 07 dated 21-11-2019 *Annexure-B* along with the formal inquiry report with the recommendations that:-
 - i. All amount illegally drawn & utilized may be recovered from both the accused.
 - ii. Both the accused may be proceeded against the Rule-3 & 4 of KPK Rules 2011.
 - iii. Mst. Shahna Hameed being an employee of teaching cadre may be adjusted at any school she has been found misfit for administration or office duties. (*Copy of the inquiry report dated 21-11-2019 is attached as Annexure-C*).
- 6 That Para-6 is incorrect that as per findings of the inquiry officer that the record & Bank statements show that Rs. 1547500/- were allocated & released to the account of GGCMS Hayat Mohammad Khel Bannu as per detail mentioned vide S.No. C in the inquiry report already attached as *Annexure-C* & is self-explanatory, hence, the plea of the appellant is misleading & against the factual position of the titled case which was resulted in the passing of an order dated 30-06-2021 by the Respondent No.3 with the direction to the appellant for the repayment of embezzlement amount of Rs. 390000/- in view of the Notification dated 02-09-2020 of the Respondent No.3 which are attached as *Annexure-D & E*.
- 7 That Para-7 is incorrect as the appellant is trying to cover up her financial corruption as proved by the inquiry officer against the appellant by taking an untraced issue having no cogent record in support of her plea, hence, liable to be rejected.
- 8 That Para-8 is incorrect & misleading as the inquiry report dated 21-11-2019 is in field against the appellant as referred above.
- 9 That Para-9 is correct to the extent of the nomination of the inquiry against the appellant vide notification dated 20-10-2019 who submitted her inquiry report on 21-11-2019 with the recommendations as mentioned in para-5, hence, the claim of the appellant is illegal & liable to be rejected.

- 10 That Para-10 is also incorrect that the inquiry report dated 21-11-2019 is the result of due process of law Rules & criteria.
- 11 That Para-11 is correct to the extent of the order dated 30-06-2021 in the light of the inquiry report dated 21-11-2019, where against, no Departmental appeal has been filed by the appellant till date, hence, got finality under the law.
- 12 That para-12 is also incorrect as the appellant is not an aggrieved person, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia:-


ON GROUNDS.


- A. Incorrect & not admitted. on the grounds that the plea of the appellant is illegal as she was been treated as per law & rules by the Department.
- B. Incorrect & not admitted. The act of the Department with regard to the Notifications dated 30-06-2021 & 02-09-2021 is within legal parameter.
- C. Incorrect & not admitted. The appellant has been treated as per Law & Rules & prescribed policy & criteria by the Department vide the Notification as cited above.
- D. Incorrect & not admitted. As replied above.
- E. Incorrect & not admitted. The act of the Department with regard to the Notifications dated 30-06-2021 & 02-09-2021 is within legal parameter
- F. Incorrect & not admitted. The inquiry report dated 21-11-2019 is within legal parameter.
- G. Incorrect & not admitted. The plea of the appellant is illegal.
- H. Incorrect & not admitted. The appellant has been treated as per law & in view of the inquiry report dated 21-11-2019 which is legal.
- I. Incorrect & not admitted. The plea of the appellant is illegal as she has been found guilty of misconduct & corruption by the competent authority.
- J. Incorrect & not admitted. The plea of the appellant is illegal as she has been found guilty of misconduct & corruption by the competent authority
- K. Incorrect & not admitted. The stand of the appellant is illegal as she could not made out her case before the inquiry officer. Therefore, the Respondent also seek leave of this Learned Bench to submit additional grounds/record & case law at the time of hearing.

PRAYER.

Therefore, in view of the above made submissions, the appeal in hand may kindly be dismissed in favor of the respondent in the interest of justice.

Dated 16/05/2023.


SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1).


DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2 & 3).

AFFIDAVIT

I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE
Department do hereby solemnly affirm and declare On oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.


Deponent

ATTESTED

Azmah Ali Advocate
Notary Public
Judicial Complex Peshawar
16/05/2023



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(5)

DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. _____ /A-17/SST/F/Complaint/General Cases/2019
Dated Peshawar / /2021.

SHOW CAUSE NOTICE

I, Hafiz Muhammad Ibrahim Director Elementary & Secondary Education Khyber Pakhtunkhwa as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve upon you Mst. Gul Shireen SST GGCMS Hayat Muhammad Khel Bannu, as follows:-

- 1 That as per the complaint lodged by Mr. Hayat Khan, resident of Hayat Muhammad Khel Bannu, vide No. Nill dated: 27-08-2019, you have been charged for corruption in the school fund.
- 2 That in response to the complaint, an inquiry was ordered by this office vide No.1849-51/A-12/Complaint/Vol-15 dated: 22-10-2019.
- 3 That the inquiry officer proved the allegations of corruption by you in her report vide No. 07 dated: 21-11-2019.
- 4 That this office impose penalty of Censure and recovery of whole amount illegal drawn and embezzled by you, i.e., Rs.390000/- under Rule 4 (a) (i) and (iii) vide this office notification No. 2114-19 A-17/SST/F/Complaint/General Cases/2019 dated: 02-09-2020.
- 5 That this office directed the DEO (F) Bannu to recover the above mentioned amount from you vide this office letter No.4590 dated: 28-01-2021 and subsequent reminder vide letter No.10084 dated: 26-03-2021 but you failed to deposit the same amount into the Government treasury.
- 6 That the competent authority is satisfied that you have once again committed acts/omissions specified in Rule-3 (b) & (c), i.e.
 - i. "Guilty of misconduct".
 - ii. "Guilty of corruption".
- 7 Therefore, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, I as the Competent Authority have tentatively decided to impose upon you any of the penalties mentioned in Rule-4 of the ibid rules.
- 8 You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
- 9 If no reply to this show cause is received within 7 days of its receipt, it shall be presumed that you have no defense to put in and, in that case, an Ex-Parte decision will be taken against you.

Director
Competent Authority
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

2116-19
12/08/2021

Endst:of Even No. & Date.

Copy of the above is forwarded for information to the:-

1. PA to Director E&SE Peshawar.
2. District Education Officer (F) Bannu with the direction to serve the show notice upon the teacher concerned under intimation to this office.
3. Principal/HM GGCMS Hayat Muhammad Khel Bannu.
4. Mst. Gul Shireen SST GGCMS Hayat Muhammad Khel Bannu.
5. Office Copy.

Director
Competent Authority
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

ENQUIRY REPORTTITLE OF ENQUIRY:

Enquiry on the complaint lodged by Mr. Hayat Khan S/O Gul Khazanat village Hayat Muhammad Khel Bannu.

ENQUIRY OFFICER:

Mst. Shazia Nawaz Deputy District Education Officer (Female), Karak.

BACK GROUND OF ENQUIRY:

A complaint application lodged by Mr. Hayat Khan was received to the Director Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar regarding corruption of Rs:1674350/- in PTC funds utilized by the ADEO(Estb) Mst. Shahna and Ex Head Mistress Gul Shareen GGMS/GCMS Hayat Muhammad Khel Bannu.

The Director Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar vide letter No. 1849-51/A-12/Complaint/Vol-15 A dated Peshawar the: 22-10-2019 appointed the above mentioned officer to probe into the matter and submit detail report along with clear finding and recommendations. (Annex A P 1-3)

PROCEDURE OF ENQUIRY:

The enquiry officer visited office of the District Education officer (Female), Bannu and GGMS/GCMS Hayat Muhammad Khel Bannu.

All the available record pertaining to the enquiry was obtained from office of the DEO (F), Bannu. PTC record pertaining to the enquiry was also obtained from Head Mistress GGMS/GCMS Hayat Muhammad Khel Bannu and was thoroughly examined. The work done under PTC as mentioned in the record was physically checked. Questionnaires were served upon both the Ex-Head Mistress GGMS/GCMS Hayat Muhammad Khel Bannu and ADEO Ast: Office of the DEO (F) Bannu. Ample time for personal hearing and defense was also provided to both the accused. Their written replies to the questionnaire served upon them were also obtained.

OBSERVATIONS:

The office record/Bank statement reveals that Rs. 1547500/- were allocated and released to the PTC account of GGMS/GCMS Hayat Muhammad Khel Bannu as per detail mentioned below. It is pertinent to mention that both the schools are running in the same building. (Annex B P 4-6)

GGCMS HAYAT MUHAMMAD KHEL BANNU

| S.No | Name of Facility | Amount released PTC Account | Year |
|------|--------------------------|-----------------------------|---------|
| 1 | Water Supply | 200000/- | 2014-15 |
| 2 | Raising of boundary wall | 627500/- | 2014-15 |
| 3 | Group latrine | 160000/- | 2014-15 |
| 4 | Play area | 120000/- | 2015-16 |

| | | | |
|-----------------------|--------------------------------|-----------|---------|
| 5 | Group latrine+ Electrification | 180000/- | 2015-16 |
| Total Amount released | | 1287500/- | |

| GGMS HAYAT MUHAMMAD KHEL BANNU | | | |
|--------------------------------|--------------------------|-----------------------------|---------|
| S.No | Name of Facility | Amount released PTC Account | Year |
| 1 | Raising of Boundary Wall | 100000/- | 2014-15 |
| 2 | Purchase of Sports Gears | 10000/- | 2014-15 |
| 3 | Furniture Repair | 60000/- | 2015-16 |
| Total Amount released | | 260000/- | |

1. GGMS HAYAT MUHAMMAD KHEL BANNU.

Mst Gul Shareen SST Head Mistress GGMS Hayat Muhammad Khel Bannu has been Secretary of PTC since 01-11-2014 to 14-11-2015. She has drawn and utilized Rs. 987000/-. In her statement she verified the allocation of funds for the facilities mentioned above. The work done against the funds allocated, released and drawn was properly examined. It was found that Rs. 627500/- utilized for raising of boundary wall with barbed wire on its top, construction of security point, white wash and minor repair of the building as stated by the head mistress and secretary PTC are justified. However the funds allocated for the Group Latrine Rs. 160000 has not been utilized and thus no lavatory has been constructed. As for as the funds allocated for water supply concerned, some pipe lining has been made and approximately 1/3 (70000) of the total released amount has been utilized. while the rest of the amount Rs.130000/- cannot be justified by the accused.

According to the statement of the accused the funds allocated for Group Latrine have been utilized on the repair of old lavatories in stead of construction new ones. She further stated that one old type of well already existed in the school was excavated and pipe lines were made, utilizing Rs. 200000/- for this purpose. However her statement is not reasonable and justifiable. She further stated that the work has been done by the land owner. However she could not provide any proof of work assigned or payment made to the land owner. (Annex C P 7-10)

Hence Rs. 130000 + 160000 total 290000/- has been misused by the accused Mst Gul Shareen with huge loss to the public exchequer. The accused also provided the Vouchers of utilization of funds on irrelevant items of stationary, purchase of miscellaneous and class consumable items. It is worth mentioning that funds for all such items has been allocated through regular PTC funds other than the conditional grant. The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate.

Mst: Shanna Hameed ADEO Estb: has exercised her authority as secretary PTC of this school though she had not been working in this school and her attendance could not be verified in this school. She had been at the office of the SDEO working as ASDEO since her appointment as SST at GGMS Hayat

Muhammad Khel Bannu. However she had been exercised the power of secretary PTC of this school illegally and unlawfully.

She has drawn Rs. 300000/- from the PTC account of this school allocated for play area, group latrine and electrification (120000, 160000, 20000). In her statement she refused to have exercised authority as secretary PTC or drawn any amount. (Annex D P 11-12)

The work done under these facilities was examined and it was found that only 120000 has been utilized under play area while the rest of amount of Rs. 180000 drawn by Mst: shahna ASDEO has not been utilized. However she has managed to produce fake vouchers for utilization of the same amount duly signed by a teacher being her subordinate but irrelevant and unauthorized to utilize the same amount, which is gross inefficiency and violation of financial procedure on the part of the accused. In her written statement she also admitted that she had not been working at any school since 01-09-2014 till date and has been working as ASDEO in the office of the SDEO and DEO till date.

Hence it is clear that she being ASDEO has misused her authority by drawing Rs. 300000/- from the PTC account of GGMS Hayat Muhammad Khel Bannu and also misusing Rs. 180000. The chairperson of PTC denied her signature on the cheque as well as on the vouchers. (Annex E P 13-14) The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate.

2. GGMS HAYAT MUHAMMAD KHEL BANNU.

As per available record and bank Statement for the Year 2014-15 and 2015-16 Rs. 260000 has been credited to the PTC Account GGMS Hayat Muhammad Khel (Rs. 100000 for barbed wire on boundary wall, Rs.100000 for Purchase of sports gears and Rs.60000 for furniture repair.) However Rs, 100000/- for Boundary wall and Rs, 100000/- for sports drawn by Mst: Shahana Hamid and has not been properly utilized. Rs, 60000/- for furniture repair drawn by Mst Gul Shareen and has not been properly utilized. All the amount Rs. 260000/- has not been properly utilized. However the accused produced some irrelevant vouchers showing utilization of the said amount, which are not reasonable and could not be justified. The chairperson of PTC denied her signature on the cheque as well as on the vouchers. The accused also failed to provide any notification of constitution of PTC written proceeding of PTC meetings and work completion certificate. Vouchers are available showing all the funds utilized but neither sports gears are purchased nor furniture has been repaired.

Hence it is clear that all the amount Rs. 260000/- has been misused by the accused with huge loss to the public exchequer. (Annex F 15-17)

FINDINGS:

In view of the above narrated facts, perusal of available office record and physical examination of the work done under PTC in both the schools i.e GGMS Hayat Muhammad Khel Bannu and GGMS Hayat Muhammad Khel Bannu running in the same building has come to the conclusion that:

1. Rs. 390000/- has been misused by the accused Mst Gul Shareen Ex- Head Mistress GGMS and GGMS Hayat Muhammad Khel Bannu which are recoverable.

63

124

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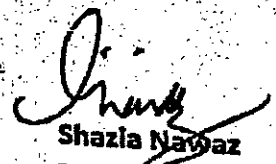
2. RS. 80000/- has been misused by Mst Shahana Hameed ASDEO establishment O/O DEO (Female) Bannu she has also been misused her authority and violated the financial procedure.

Hence all the amount used illegally and unlawfully needs to be recovered from the accused and both of them are liable to be proceeded against for their inefficiency, violation of financial procedure and corruption which are tantamount to misconduct.

RECOMMENDATIONS:

It is hereby recommended that:

1. All the amount illegally drawn and utilized may be recovered from both the accused.
2. Both the accused may be proceeded against under rule 3 and 4 of Khyber Pakhtunkhwa Govt Servant E&D rules 2011.
3. Mst. Shahana Hameed being an employee of teaching cadre may be adjusted at any school as she has been found misfit for administration or office duties.



Shazia Nawaz
DDEO (F) Karak/Enquiry Officer.



64

(11)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BANNU.

NO. 3679-B1

Dated Bannu the 30/06/2021

TO,

- 1- Principal, GGHS NO.2. Bannu City.
- 2- Headmistress, Bada Mir Abbas

Subject: -

RECOVERY IN RESPECT OF MST: GUL SHREEN SST (EX: HM) GGMS HAYAT
MUHAMMAD KHEL & MST: SHAHANA Hamid EX: ADEO (ESTAB) O/O DEO
(FEMALE) BANNU.

Memo:-

Reference Directorate of E & SE Khyber Pakhtunkhwa Peshawar

Notification Endst: NO. 2114-19 and 2108-13 Dated 02/09/2020.

It is stated for your kind information that may please be start recovery from her salaries, of the above subject teachers i.e. Gul Shreen SST (Ex: HM) GGMS Hayat Muhammad Khel & Mst: Shahana Hamid (Ex: ADEO Establishment) of this office, detail of recovery are as under.

- 1- Mst: Gul Shreen SST. Rs, 390000
- 2- Mst: Shahana Hamid SST. Rs, 380000

Copy of Pay Slips of the concerned teachers, & initiation of your disciplinary action may reached to the undersigned office in five days positively.

Sunray
District Education Officer,
(Female) Bannu.

Endst: NO. _____ / Dated Bannu the _____ / 2021.

Copy for information to the:-

- 1- Director of Elementary and Secondary Education KPK Peshawar.

Sol
District Education Officer,
(Female) Bannu.

U/24/7/021



65

12

**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR**

NOTIFICATION

1. WHEREAS, A complaint was received from Mr. Hayat Khan S/O Khazanat Khan, resident of Hayat Muhammad Khel, District Bannu, lodged against Ms. Shahana Hameed, ADEO (F) Establishment office of DEO (F) Bannu vide No. 1776 dated: 22-08-2019.
2. AND WHEREAS, Mst; Shahzia Nawaz Deputy DEO (F) Karak was nominated as an inquiry officer vide this office Notification No. 1849-51/A-12/Complaint/Vol-15A dated 22-10-2019.
3. AND WHEREAS, the inquiry officer, after having examined the charges and evidence on the record including her personal defense, submitted the inquiry report vide letter No.07 dated 21-11-2019.
4. AND WHEREAS, Show Cause Notice was issued to Ms. Shahana Hameed, ADEO (F) Establishment office of DEO (F) Bannu vide this office Notification No.9093-95 dated: 31-12-2019.
5. AND WHEREAS, considered the charges, evidence on the record and giving the opportunity of personal hearing/appearing in person to the accused ADEO, the Competent Authority is of the view that the charges leveled against her have been proved.
6. NOW THEREFORE, in exercise of power conferred under the E&D Rules,2011, the Competent Authority has been pleased to impose minor penalty of CENSURE and recovery of whole amount illegal drawn and utilized by the Ms. Shahana Hameed, ADEO (F) Establishment office of DEO (F) Bannu i.e., 380000 under Rule 4 (a) (i) and (iii) of the Ibid Rules.

Note: Ms. Shahana Hameed SST will not be adjusted at any Administrative Post in future.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 2114-19 /A-17/Complaint/General Cases/2019. Dated: 22/10/2020
Copy forwarded for information and necessary action to the: -

- 1 Private Secretary to Minister for Elementary & Secondary Education Khyber Pakhtunkhwa w.r to letter No. PS/Minister/E&SE/KPK/2020 dated: 13-07-2020.
- 2 District Education Officer (F) Bannu with the remarks to recover whole amount illegal drawn and utilized by the accused teacher under intimation to this office.
- 3 District Accounts Officer Bannu.
- 4 Principal/Head Mistress of GGHS No.02 Bannu.
- 5 Principal/Head Mistress of GGCMS Hayat Muhammad Khel Bannu.
- 6 Teacher Concerned.
- 7 Master file.

Dr. A. H. Khan
2/9/2020
Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

dc
2/9/2020

بابت ماہ

ادائیگی

وصولی GGPMS حیدرآباد و زلیخہ و خیاب

| تاریخ | تفصیل آمدن | رہید نمبر | رقم | میزان | تاریخ | تفصیل خرچ | رہید نمبر | رقم | میزان |
|-------|------------|-----------|-----|-------|-------|-----------------------|-----------|-----|-------|
| | | | | | 2014 | کھانا کھانے کے لئے | 1 | | |
| | | | | | | Slop Mankehab | | | |
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| | | | | | | کڑا پتھر قسیر و معدا | | | |
| | | | | | | ٹریڈنگ کرایہ | | | |
| | | | | | | تعمیراتی (پتھر وغیرہ) | | | |
| | | | | | | تعمیراتی کرایہ | | | |
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Head Mistress
G.G.P
Zayat Mo. 1st Khel
Sannu

| ردیف | نام اشیا | مقدار | نرخ | کل قیمت | محل قیمت | کد اشیا | خرید یا گی | یہ نامہ کیفیت کیلئے ہے جب کوئی چیز جرگہ سے ذرا بڑی ہوتی ہے تو اس کے دوران سارا جرگہ حکم سے فارغ کیا جائے اور اس کے تمام ذمے کو یاد کیا جائے |
|------|-------------|-------|-----|---------|----------|---------|------------|---|
| 20 | افیل لچ آؤٹ | 1 | | 100.00 | | | | |
| | آف بیل | | | | | | | |
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| | Saw | | | | | | | |
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| | فٹنگ برابری | | | 3000 | | | | |
| | مشرقی + | | | 2000 | | | | |
| | سبز + | | | | | | | |

20/11/19

سکول

20/11/19

| ادائیگی | | وصول | | میزان | | رقم | | تفصیل آمدن | | تاریخ |
|---------|--------|---------|---------------------------|---------|-------|------------|---------|--------------------|---------|-------|
| میزان | رقم | ریسپنڈر | تفصیل خرچ | تاریخ | میزان | رقم | ریسپنڈر | تفصیل آمدن | تاریخ | |
| | | | | 19/8/16 | 700/- | 350x2 | 5 | گولی | 31/8/16 | |
| 3000 | 3000/- | | عنا خانہ کھانا | ✓ | 330 | 120+20+190 | | یک سینڈ پیپ (گولی) | | |
| | | | بازار (بٹن بکلیٹ مسٹری) | ✓ | 540 | 240+300 | | ایلیو 8 عدد | | |
| | | | ادارنگا (بٹن بکلیٹ مسٹری) | | 140 | 140 | | سیٹ | | |
| 2000 | 2000/- | | 1500/- | ✓ | 400 | 400 | | شاور ایک عدد | | |
| | | | 1200/- | | 60 | 30x2 | | سیٹ 2 عدد | | |
| 2000 | 2000/- | | 500/- | ✓ | 1040 | 110x2x6 | | پائپ 2 نمبر | | |
| | | | | | 30 | 30 | | بلٹ | | |
| | | | | | 420 | 120+300 | | ایلیو 5 عدد | | |
| 15000/- | | | | | 450 | 450 | | بیمہ مال و الی 3/4 | | |
| 2000/- | 2000/- | 3 | Head Mistress | 18/8/16 | 350 | 350 | | بیمہ مال و الی | | |
| 2000/- | 2000/- | 4 | G.P.C.M. School | 18/8/16 | 320 | 130+70+120 | | پولیسنگ | | |

9000/- ٹوٹل

Head Mistress
G.P.C.M. School
Bannu

70

15/8/06

بابت نام

کیش بک 18

GGC/M/S حیات محمد ضلع

| ادائیگی | | | | وصولی | | | |
|---------|------|----------|-----------|---------|-------|-----|------------|
| میزان | رقم | ریسیڈنسر | تفصیل خرچ | تاریخ | میزان | رقم | تفصیل آمدن |
| 6420 | 6420 | ✓ | تعمیرات | 15/8/06 | | | |
| | | | 535 | | | | |
| 999 | 999 | | بائیک | | | | |
| 6500 | 6500 | | سیریا | | | | |
| 3600 | 3600 | | کرائڈ | | | | |
| 5000 | 5000 | | کرائڈ | | | | |
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Head Mistress
G.G.P.C.M. School
Hayat Mohammad Khel
Bannu

14702

22/5/16 بابہ

| ادائیگی | | | | وصولی | | | | | |
|---------|------|-----------|-----------------|---------|-------|------|-----------|-------------|---------|
| میزان | رقم | رہید نمبر | تفصیل خرچ | تاریخ | میزان | رقم | رہید نمبر | تفصیل آمدن | تاریخ |
| 4500 | 150 | 12 | 30 دینا کی پیسہ | 22/5/16 | 2390 | 2390 | 2 | سٹال مندرجہ | 22/5/16 |
| 240 | 20 | | 12 دینا کی پیسہ | | | | | | |
| 300 | 150 | | 32 دینا کی پیسہ | | | | | | |
| 150 | 150 | | 1 دینا کی پیسہ | | | | | | |
| 30 | 30 | | 1 دینا کی پیسہ | | | | | | |
| 500 | 50 | | 10 دینا کی پیسہ | | | | | | |
| 40 | 20 | | 2 دینا کی پیسہ | | | | | | |
| 6500 | 6500 | | 10 دینا کی پیسہ | | | | | | |
| 750 | 150 | | 3 دینا کی پیسہ | | | | | | |
| 2000 | 200 | | 10 دینا کی پیسہ | | | | | | |
| 100 | 50 | | 5 دینا کی پیسہ | | | | | | |
| 9500 | 350 | | 10 دینا کی پیسہ | | | | | | |

17610
2390
19000

Head Mistress
G.G.P.C.M. School
Hayat Muhammad School
nu

17610

31/12/2018

کیش بیک

کیش بیک

| الاصح | | | صلاحت | | مبلغ | | وصول | |
|-------|-------|------|---------|-------|------|-------|------|-------|
| مبلغ | تاریخ | ردیف | تفصیل | تاریخ | مبلغ | تاریخ | ردیف | تفصیل |
| 700 | 350 | 8 | الاولیٰ | | | | | |
| 190 | 10/- | | مکتف | | | | | |
| 500 | 90/- | | مکتف | | | | | |
| 500 | 50/- | | مکتف | | | | | |
| 160 | 160/- | | مکتف | | | | | |
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Head Mistress
GGPS School
Date: 31/12/2018

20/10/2015

بابت

| ادائیگی | | | | وصولی | | | | | |
|---------|------|-----------|---------------|---------|-------|-----|-----------|------------|-------|
| میزان | رقم | رہدہ نمبر | تفصیل خرچ | تاریخ | میزان | رقم | رہدہ نمبر | تفصیل آمدن | تاریخ |
| 1325 | 1325 | 7 | 25 لاری سیرنگ | 20/2016 | | | | | |
| 600 | 600 | | نمبر 1500 | | | | | | |
| | | | ریٹ | | | | | | |
| 1000 | 1000 | | 20 لاری سیرنگ | | | | | | |
| 60 | 60 | | لڈنگ 60 روپے | | | | | | |
| | | | کھانا | | | | | | |
| | | | ریٹ | | | | | | |
| 8000 | | | کھانا | | | | | | |
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| 33030 | | | | | | | | | |

کیش بک 22

کیش بک کلاس حیات محمد رسول

ابتداء العتبات

| ادائیگی | | | | وصولی | | | | | |
|---------|------|---------|---------------------|-----------|-------|---------|---------|------------------|-------|
| میزان | رقم | ریسپنڈر | تفصیل خرچ | تاریخ | میزان | رقم | ریسپنڈر | تفصیل آمدن | تاریخ |
| | | | | 21/8/2016 | 700 | 700 | 5 | لوہین بند اجراء | |
| | | | | | 320 | 180+150 | | سلاوشی، خالی | |
| 1000 | | = | (2) (2) (2) (2) (2) | ✓ | 180 | 80+100 | = | ایلو + فوڈ بائیں | |
| 635 | 635 | = | کلاس کالنگ | ✓ | 4000 | 4000 | = | منڈی | |
| 7635 | 7635 | = | لوہین ریسپنڈر | ✓ | 14325 | | | | |
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Head Mistress
G.G.P.C.M. School
Hayat Mohammad Khel
Bannu

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 ۱۰۰۰۰/-
 ۲۳/۰۵/۱۵

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| ۱ | ۱۰۰۰۰/- | ۱۰۰۰۰ | ۱ | ۱۰۰۰۰ |
| ۲ | ۳۰۰/- | ۳۰۰ | ۲ | ۳۰۰ |
| ۳ | ۹۰ | ۹۰ | ۳ | ۹۰ |
| ۴ | ۱۰۰ | ۱۰۰ | ۴ | ۱۰۰ |
| ۵ | ۱۵۰ | ۱۵۰ | ۵ | ۱۵۰ |
| ۶ | ۱۵۰۰ | ۱۵۰۰ | ۶ | ۱۵۰۰ |
| ۷ | ۳۰۰ | ۳۰۰ | ۷ | ۳۰۰ |
| ۸ | ۲۰۰ | ۲۰۰ | ۸ | ۲۰۰ |
| ۹ | ۷۰۰/- | ۷۰۰ | ۹ | ۷۰۰ |
| ۱۰ | ۱۰۹/- | ۱۰۹ | ۱۰ | ۱۰۹ |
| ۱۱ | ۵۳۰۰/- | ۵۳۰۰ | ۱۱ | ۵۳۰۰ |
| ۱۲ | ۲۰۰۰/- | ۲۰۰۰ | ۱۲ | ۲۰۰۰ |
| ۱۳ | ۱۰۰۰/- | ۱۰۰۰ | ۱۳ | ۱۰۰۰ |
| ۱۴ | ۲۰۰۰/- | ۲۰۰۰ | ۱۴ | ۲۰۰۰ |
| ۱۵ | ۵۰۰/- | ۵۰۰ | ۱۵ | ۵۰۰ |
| ۱۶ | ۲۵۰۰/- | ۲۵۰۰ | ۱۶ | ۲۵۰۰ |
| ۱۷ | ۱۳۰۰/- | ۱۳۰۰ | ۱۷ | ۱۳۰۰ |
| ۱۸ | ۸۰۰/- | ۸۰۰ | ۱۸ | ۸۰۰ |

۱۳۳۹

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|---|--------|------|---|------|
| 3 | 6000/- | 6000 | 3 | 6000 |
| - | 9800/- | 9800 | - | 9800 |
| - | 400/- | 400 | - | 400 |
| - | 700/- | 700 | - | 700 |
| - | 800/- | 800 | - | 800 |
| - | 800/- | 800 | - | 800 |
| - | 600/- | 600 | - | 600 |
| - | 3000/- | 3000 | - | 3000 |
| - | 800/- | 800 | - | 800 |
| - | 400 | 400 | - | 400 |

20400
 62600
 83000
 17000
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Secretary of Commission PTA
 GMS Hayat Muhammad Khel
 East W

پروگرام برائے لائبریری کی تعمیر

پروجیکٹ کی رقم 100000/-

05.10.2015

| رقم | رقم | رقم | موصوفات | رقم |
|----------|----------|-----|-------------------|----------|
| 100000/- | - | - | ایک لاکھ | 100000/- |
| 16800/- | 16800/- | 1 | بیشل ایچ ایم ایچ | 16800/- |
| 17000 | 200/- | - | ایچ ایم ایچ | 200/- |
| 9600/- | 1200 x 8 | 8 | 8 عدد ٹیبل | 9600/- |
| 14700/- | 1800 x 8 | 8 | 8 عدد ٹیبل | 14700/- |
| 6400/- | 1600 x 4 | 4 | 4 عدد ڈرائنگ ٹیبل | 6400/- |
| 4800/- | 480 x 10 | 10 | 10 عدد ٹیبل | 4800/- |
| 100/- | 100 x 2 | 2 | 2 عدد ٹیبل | 100/- |
| 4200/- | 1400 x 3 | 3 | 3 عدد ٹیبل | 4200/- |
| 3800/- | 950 x 4 | 4 | 4 عدد ٹیبل | 3800/- |
| 7800/- | 650 x 12 | 12 | 12 عدد ٹیبل | 7800/- |
| 1800/- | 150 x 12 | 12 | 12 عدد ٹیبل | 1800/- |
| 1600/- | 160 x 10 | 10 | 10 عدد ٹیبل | 1600/- |
| 2400/- | 200 x 12 | 12 | 12 عدد ٹیبل | 2400/- |
| 1200/- | 100 x 12 | 12 | 12 عدد ٹیبل | 1200/- |
| 1900/- | 950 x 2 | 2 | 2 عدد ٹیبل | 1900/- |
| 62600/- | | | | 62600/- |

77
۱۶/۱۰/۲۰۱۵

کمیشن دین

۹۵

پروگرام برائے تعلیمات عامہ اور کھیلوں کی ترقی
پروگرام برائے تعلیمات عامہ اور کھیلوں کی ترقی
۱۰۰۰۰۰/-

05.10.2015

| رقم | رقم | مذکورہ شرح | رقم | مذکورہ شرح |
|----------|-----------|------------|----------|-------------|
| 100000/- | - | - | 100000/- | ایک لاکھ |
| 15800/- | 16800/- | 1 | 15800/- | پینل انجمن |
| 17000 | 2000/- | - | 17000 | پینل انجمن |
| 9600/- | 12000 x 8 | 8 | 9600/- | 8 عدد پینل |
| 147000/- | 18000 x 8 | 8 | 147000/- | 8 عدد پینل |
| 64000/- | 16000 x 4 | 4 | 64000/- | 4 عدد پینل |
| 48000/- | 4800 x 10 | 10 | 48000/- | 10 عدد پینل |
| 7000/- | 3500 x 2 | 2 | 7000/- | 2 عدد پینل |
| 42000/- | 1400 x 3 | 3 | 42000/- | 3 عدد پینل |
| 38000/- | 9500 x 4 | 4 | 38000/- | 4 عدد پینل |
| 78000/- | 6500 x 12 | 12 | 78000/- | 12 عدد پینل |
| 18000/- | 1500 x 12 | 12 | 18000/- | 12 عدد پینل |
| 16000/- | 1800 x 20 | 20 | 16000/- | 20 عدد پینل |
| 24000/- | 2000 x 12 | 12 | 24000/- | 12 عدد پینل |
| 12000/- | 1000 x 12 | 12 | 12000/- | 12 عدد پینل |
| 19000/- | 9500 x 2 | 2 | 19000/- | 2 عدد پینل |
| 626000/- | | | | |