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## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO


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Muharir Compilation

  
Incharge Judicial Branch

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

Shakeel Arshad.....Appellant

Versus

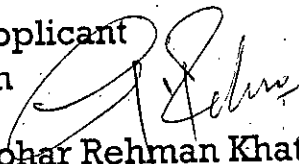
Excise & Taxation Department and others .....Respondents

**Application for setting aside order dated  
20.12.2021, whereby defence of the  
respondent struck-off to the extent of filing  
written reply.**

**Respectfully Sheweth:**

1. That the above titled appeal is pending before this Hon'ble Tribunal and is fixed for today i.e. 24.05.2022.
2. That the respondents are going to file written reply and came to knowledge that defense of respondents has been struck-off.

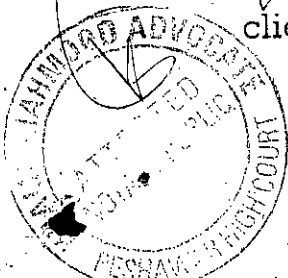
It is, therefore, requested that order dated 20.12.2021, may please be re-called/ set-aside and the respondents/ appellant may please to allow to submit written reply.

Applicant  
Through   
Gohar Rehman Khattak  
Advocate  
Legal Advisor E, T & N

**AFFIDAVIT**

I, do hereby affirm and declare as per instruction of my client, contents of application are true and correct.

  
Deponent



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

**Service Appeal No. 7755/2021**

BEFORE: MRS. RASHIDA BANO ... MEMBER (J)  
MISS FAREEHA PAUL ... MEMBER (E)

Gul Sheréen SST (G) at Government Girls Community Model School, Hayat Muhammad Khel Bannu. ....(Appellant)

Versus

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

Mr. Zartaj Anwar,  
Advocate

... For appellant

Mr. Asif Masood Ali Shah,  
Deputy District Attorney

... For respondents

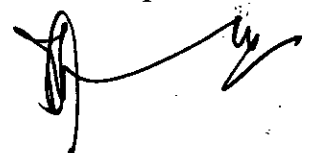
Date of Institution..... 15.11.2021  
Date of Hearing..... 24.04.2024  
Date of Decision..... 24.04.2024

**SCANNED**  
**KPST**  
**Peshawar**

**CONSOLIDATED JUDGEMENT**

**FAREEHA PAUL, MEMBER (E):** Through this single judgment, we intend to dispose of instant service appeal as well as connected service appeal No. 7756/2021, titled "Shahana Hameed Versus Government of Khyber Pakhtunkhwa through Secretary E&SE, Civil Secretariat Peshawar and others", as in both the appeals, common questions of law and facts are involved.

2. The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned order dated 30.06.2021, against which her departmental appeal was not responded



till expiry of ninety days statutory period. It has been prayed that on acceptance of the appeal, the impugned recovery order dated 30.06.2021 might be set aside and appellant be exonerated from the allegations leveled against her, alongwith any other remedy which the Tribunal deemed appropriate.

3. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was initially appointed as PST and was gradually promoted to the post of SST BPS- 16 vide notification dated 01.11.2014 and was posted at Government Girls Community Model School, Hayat Muhammad Khel Bannu. While serving in the said capacity as a Head Teacher at GGCMS Hayat Khel Bannu, funds were allocated/sanctioned by the government for necessary repair of boundary wall, common washroom and water supply in the said school. Government transferred the said amount to a joint account i.e. Parent Teacher Account. In order to utilize the sanctioned amount for the purpose, the appellant, in the light of laid down procedure, duly constituted a committee of teachers and elders of the locality, including the land owner who provided land to the government for construction of school. Whenever any work was done and funds were issued to the government contractor, that was done in consultation with the said committee. The amount was sanctioned and allocated for three types of work, which included Rs. 627,500/- for boundary wall, Rs. 160,000/-for common washrooms and Rs. 200,000/- for water supply and sanitation. The said amount was spent on the mentioned distributions and acknowledged by the committee and the funds issued to the contractor were duly signed by the members of the committee. In the year 2019, one Hayat Muhammad, who was the owner of the land on which school was built,



having personal grudges with the appellant, filed a complaint before the competent authority by leveling allegations of corruption and embezzlement of the funds sanctioned for the repair of school in the year 2015. An inquiry was initiated and the inquiry officer duly conducted the inquiry by going through all the available record, as well as inspected the work done and recommended the exoneration of appellant from charges leveled against her. The respondent department, without taking into consideration the inquiry, constituted another committee to inquire into the matter without giving any reason. The inquiry officer of the second enquiry, without taking into consideration the report submitted by the appellant, as well as the first inquiry report, recommended the appellant for recovery of amount spent on the developmental work and did not mention any specific amount. The respondent department in the light of the recommendations, issued the recovery order dated 30.06.2021. Feeling aggrieved, she submitted her departmental appeal on 15.07.2021, which was not responded till filing of the instant service appeal.

4. Respondents were put on notice who submitted their joint parawise comments on the appeal. We heard the learned counsel for the appellant as well as learned Deputy District Attorney for the respondents and perused the case file with connected documents in detail.

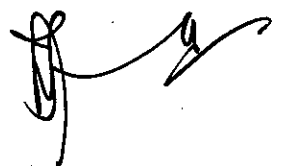
5. Learned counsel for the appellant, after presenting the case in detail, argued that the appellant was not treated in accordance with law and the impugned order was tainted with malafide, bias and was based on personal grudges. He argued that the respondent department, without taking into consideration the inquiry already conducted on the order of the competent



authority, illegally constituted another committee to inquire the matter without giving any reasons. According to him there was no mention of the point of law on which second inquiry was conducted and on what point of law the authority did not agree with the findings and recommendations of the first inquiry and that it was against the law and rules on the subject. He argued that second inquiry was illegal in the eyes of law. He requested that the appeal might be accepted as prayed for.

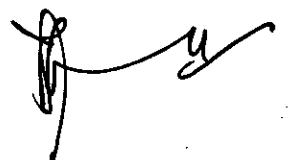
6. Learned Deputy District Attorney, while rebutting the arguments of learned counsel for the appellant, argued that the appellant was proceeded against under the E&D Rules 2011 on the charges of corruption in the PTC School Fund in response to the complaint made by Hayat Khan son of Khazanat Khan, District Bannu. The appellant was found guilty of corruption to the tune of Rs. 390,000/- in the PTC Fund allocated by the government therefore, a formal inquiry was conducted vide notification dated 22.10.2019 and charges were proved against the appellant. As per findings of the inquiry officer Rs. 1,547,500/- were allocated and released. Vide order dated 30.06.2021, the appellant was directed to repay embezzled amount of Rs. 390,000/-. He requested that the appeal might be dismissed.

7. Through the instant service appeal, the appellant has impugned a memo: dated 30.06.2021 vide which recovery of Rs. 390,000/- has been ordered by the District Education Officer (Female) Bannu from the salary of the appellant. From the arguments and record presented before us, it transpires that an inquiry was initiated by the Directorate of Elementary and Secondary Education, Peshawar against the appellant for the period she remained as Head



Mistress at Government Girls Community Model School, Hayat Muhammad Khel, Bannu on the charges of embezzlement of funds released for some construction and repair work at the said school. A report dated 08.11.2019, attached with the appeal addressed to the Director E&SE, Peshawar, shows that District Education Officer (Male) Tank was appointed as Inquiry Officer. As no charge sheet and statement of allegations was available, either with the appeal or with the reply of respondents, therefore, upon query, it was clarified that it was a report of some fact finding inquiry. The inquiry was initiated against the appellant, and another, on the basis of a complaint submitted by one Mr. Hayat Khan, who was the owner of the land on which the school was constructed and was also serving as Chowkidar in that school. In his report, the Inquiry Officer recommended that the allegations in the complaint were baseless and that the inquiry be filed. After that, a second inquiry was conducted through Deputy District Education Officer (Female) Karak, who gave her finding that funds were misused and recovery be made. On the basis of the second inquiry report, recovery of Rs. 390,000/- was ordered, by the DEO (F) Bannu, from the appellant. It was noted that the second inquiry was also not a formal inquiry under the rules and no charge sheet and statement of allegations was issued.


8. One fails to understand how the departmental authority acted and ordered recovery without conducting a regular inquiry under the Government of Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011. No record and orders of the competent authority were produced before us to ascertain the grounds on which second inquiry was ordered based on which, order of




recovery was issued. It was astonishing that the respondent department did not bother to conduct an audit of the funds spent on the construction and repair in the said school, to ascertain whether any misuse actually happened or not.

9. In view of the above discussion, 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.

10. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 24<sup>th</sup> day of April, 2024.*

  
(FAREEHA PAUL)  
Member (E)

  
(RASHIDA BANO)  
Member(J)




7

SA 7755/2021

24<sup>th</sup> 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, 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 24<sup>th</sup> day of April,  
2024.*

  
(FAREEHA PAUL)  
Member (E)

  
(RASHIDA BANO)  
Member(J)

\*Fazal Subhan PS\*


SCANNED  
KPST  
Peshawar

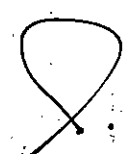
24.10.2023

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)

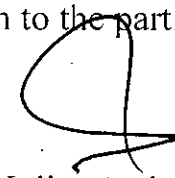
\*Naeem Amin\*

1<sup>st</sup> 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.

SCANNED

  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman

\*Mutazem Shah \*

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  
KPST  
Peshawar

(Fareeha Paul)  
Member (E)

(Salah-ud-Din)  
Member (J)

\*Naeem Amin\*


*[A long, thin, curved line drawn across the page, possibly a signature or a mark.]*


18<sup>th</sup> 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.

SCANNED  
KF ST  
Peshawar

  
(Fareeha Paul)  
Member (E)

  
(Rashida Bano)  
Member (J)

5.05.2023

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

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)

\*Kamranullahi\*

SCANNED  
KPST  
Peshawar


SA 7755/2021

28<sup>th</sup> March, 2023

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

SCANNED  
KPST  
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.

  
(Fareeha Paul)  
Member(E)

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.




(Salah-ud-Din)  
Member (J)

21.02.2023

Clerk to learned counsel for the appellant present. Mr. Muhammad Riaz Khan Pindakhel, 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.



(Muhammad Akbar Khan)  
Member (E)

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Peshawar

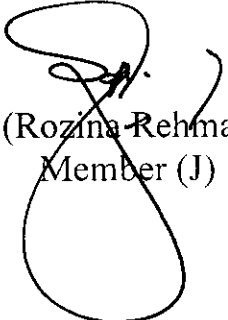
20.12.2022

SCANNED  
KPST  
Peshawar

14  
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)

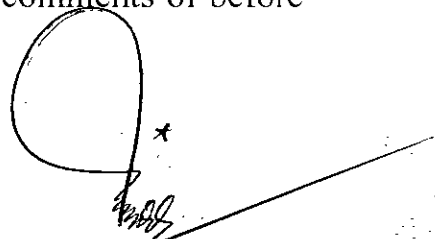


17.11.2022

15  
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.

Despite last chance, reply on behalf of respondents was not submitted. Learned AAG requested for time to submit reply/comments; granted but on payment of cost of Rs 3000/- to be paid in Court through proper receipt which will later on be paid to the appellant. To come up for reply/comments on 17.11.2022 before S.B.

(Rozina Rehman)  
Member.(J)

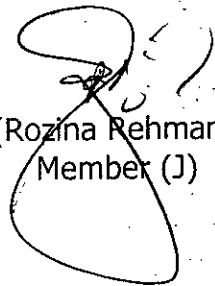
07.01.2022

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.

2<sup>nd</sup> 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.

SCANNED  
KPST  
Peshawar

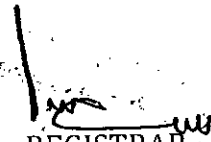

  
Chairman

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7755/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
<p>1-</p> <p>2-</p> <p>(17)</p> <p>R</p>	<p>15/11/2021</p>	<p>The appeal of Mst. Gul Shereen 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> <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>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST

Case Title: Gul Shereen

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>Mr. Zafar Anwar</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: \_\_\_\_\_

20

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

Service Appeal No. 77551 2021

**SCANNED**  
**KPST**  
**Peshawar**

Gul Shereen SST (G) at Government Girls Community Model  
School Hayat Muhammad Khel Bannu.

(Appellant)

**VERSUS**

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

(Respondents)

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Through

*Gul Shereen*  
Appellant

**ZARTAJ ANWAR**

Advocate High Court

Office FR, 3-4 Forth Floor

Bilour Plaza Peshawar Cantt.

Cell: 0331-9399185

Email: [Zartaj9@yahoo.com](mailto:Zartaj9@yahoo.com)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL****PESHAWAR**Khyber Pakhtunkhwa  
Service TribunalService Appeal No. 7755/2021Diary No. 7882Dated 15/11/2021Gul Shereen SST (G) at Government Girls Community  
Model School Hayat Muhammad Khel 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  
15/11/2021  
Registrar

**Respectfully Submitted:**

- 1) That the Appellant was initially appointed as PST and since her appointment the appellant performed her duties with great zeal and devotion.

- 2) That due to her hard work the appellant was promoted to the post of SST BPS-16 vide notification dated 01.11.2014 and was posted at Government Girls Community Model School Hayat Muhammad Khel Bannu, where the appellant performed her duties with all her capabilities and become headmistress.
- 3) That while serving in the said capacity as a Head Teacher at GGCMS Hayat Muhammad Khel Bannu, amount 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 A & B).
- 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 C)*.
- 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 D)*.
- 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 E & F)*.
- 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.*

*[Signature]*  
Appellant

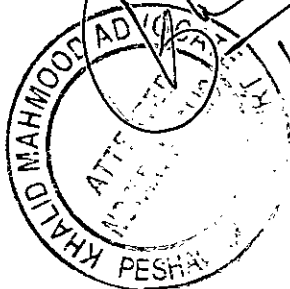
Through

*[Signature]*  
ZARTAJ ANWAR  
Advocate Peshawar

*[Signature]*  
IMIRAN KHAN  
Advocate Peshawar

**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 the contents of the above appeal are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal.



Deponent

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

Service Appeal No. \_\_\_\_\_ / 2021

Gul Shereen SST (G) at Government Girls Community Model  
School Hayat Muhammad Khel Bannu.

**(Appellant)**

***VERSUS***

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

**(Respondents)**

**ADDRESSES OF PARTIES**

**Appellant**

Gul Shereen SST (G) at Government Girls Community  
Model School Hayat Muhammad Khel 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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7

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

Service Appeal No. \_\_\_\_\_ / 2021

Gul Shereen SST (G) at Government Girls Community Model  
School Hayat Muhammad Khel 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.

Through Applicant

*Zartaj Anwar*  
**ZARTAJ ANWAR**  
Advocate Peshawar

*Imran Khan*  
**IMRAN KHAN**  
Advocate Peshawar

**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 the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honourable Tribunal.

*Gul Shereen*  
15-11-21  
*Gul Shereen*  
Deponent



میں نے گواہی دے کر اس عیان کو منسلک نہیں کیا۔

EMIS Code: 11972 PIA

آج جو رقم 23<sup>06</sup> کو PIA کی منگ سے ہوئی  
 اس منگ کا آغاز تلاوت کلام پاک سے ہوا  
 دعا کے بعد تمام اراکین کو کھینٹی کا تعارف ہوا  
 کھینٹی کے تمام ارکان کو سکول میں آنے والی رقم  
 987000 کے متعلق بتایا اور تفصیل بھی بتائی کہ  
 6.270000 یا لڈریک والی رقم کے لئے 2500000 والی  
 سہولت اور 1600000 لیٹرن کے لئے آج سے خواہش  
 اراکین نے فیصلہ کیا کہ عیات خان صاحب مکملان بھی  
 اسے گواہی دے اور شہرہ میں کام کرایا جائے گا۔

عیات

Head Mistress  
G.S.C.S  
Moghalpore

1.8.2017

13  
13  
Banda

عیات 0117

13/8/17

عیات

عیات

ATTESTED

اساتذات محترمہ کی طرف سے

6 MS

پتہ (P.T.A) کراچی  
 پتہ (P.T.A) کراچی  
 پتہ (P.T.A) کراچی  
 پتہ (P.T.A) کراچی  
 پتہ (P.T.A) کراچی

نام	پتہ	تاریخ	ملاحظات
محمد شفیق	11101-5838510-8.2	5-11-016	
محمد شفیق	11101-8289462-8.3		
محمد شفیق	11101-0968894-0.8		
محمد شفیق	11101-3817431-8.5	5-11-016	
محمد شفیق	11101-0107007-2.0		
محمد شفیق	11101-8365195-6.7		
محمد شفیق	11101-5742266-6.6		

ATTESTED

محمد شفیق

Close Attestation  
 2016

Close Attestation  
 2016

محمد شفیق  
 محمد شفیق  
 محمد شفیق



فائز برائے نو تشکیل شدہ پٹی اے۔

EMIS کوڈ 11972

گاماؤں خدوی محمد خیل منڈل

یونین کونسل منڈل

حصہ منڈل خدوی

غلبر شمار	نام شناختی کارڈ	الہیہ غلبر	ولایت	عمر	جنس	تعلیم	مقام داخلہ	تاریخ	تاریخ	تاریخ
1	نور شہین	-	پورا اعظم شاہ	44	عورت	-	-	-	5-11-2014	5-11-2016
2	جانسردارہ	1101-5838510-8	نور اسلام خان	38	==	==	-	==	==	==
3	سپیل خانہ	1101-8289462-8	عجب خان	54	==	==	-	==	==	==
4	صافینہ بی بی	1101-0968894-0	اشرف	27	==	==	-	==	==	==
5	گل پیاؤ زادہ	22201-3817431-8	بارسوخ شہین	45	==	==	-	==	==	==
6	مبینہ بی بی	1101-0107159-2	شہین اللہ	45	==	==	-	==	==	==
7	بادشاہ گلہ	1101-8363193-6	شہان خان	50	==	==	-	==	==	==
8	گل شہین	1101-5742265-6	نور اعظم شاہ	49	==	==	M.A M.ed	-	-	-

ATTECA

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تاریخ

دستخط

12 گورنمنٹ گریجویٹ سکول ماڈل سکول صیانت محمد علی

باقی رہا	باغیچہ والی	تاریخ
B/W	627500/-	18/8/015

B/W	474022	تاریخ
	<u>153478</u>	باقی رہا

تکلیفی رپورٹ

باغیچہ والی کی چاروں طرف سے صیانت اور اوٹھانی  
خارجہ دار تار چاروں طرف نصب کی گئی بقایا رقم سے  
لی کی سے کی مشینوں سے رنگ ورائز اور دیگر مہر  
کاغذ ہونے جسکی تفصیل اس سے موجود ہے۔

28/08/015

ATTESTED



2015 - 15

آمدن و اخراجات

گواہت ریز کمیونٹی ماڈل سکول حیات محمد خیل

گروپ لٹرن کیم میں آئی رقم =

RS = 160000/-

زیچ شدہ رقم = RS. 160000/-

تاریخ چین - آئی رقم - آئی سے آئی آئی آئی

2015-08-18 - RS 160000/- - گروپ لٹرن کیم

(5 عدد وائش رقم)

تعمیلی رپورٹ

16/09/2015 کو گواہت ریز کمیونٹی ماڈل سکول حیات محمد خیل

میں 5 عدد گروپ لٹرن کیم نام میں لیا گیا

16-09-2015

Head Minister  
G.S.C.M.F.  
Gyat Bahawalpur

ATTESTED

آئین و اصلاحات 2015ء

گواہت (کنگریسیوں کا ڈال سکول صبا راجہ خیل  
واٹر پیلائی میں آئی ہوئی رقم -

رجسٹرڈ رقم - RS 259140 -

صبا راجہ خیل - کل رقم - سر محمد علی خیل

18/08/2015 - 259140 - واٹر پیلائی

کلیں ایورٹ

گواہت (کنگریسیوں کا ڈال سکول صبا راجہ خیل میں ہوا  
بیلے سے موجود تھا۔ مگر خیریت کہ اس میں کدائی اور مٹی لپیٹی  
ساتھ میں زمین ٹینٹ پائی محفوظ کرنے کے لیے بنایا گیا۔ ساتھ میں  
چھوٹی لٹھی کڑھیاں لپیٹی گئی تھیں۔ تاکہ بیلے کے استعمال  
رہیں۔ لٹھی کے مشاوریات سے کام لیا گیا۔

18/08/2015

Head Mistress  
C.C.M.C  
Hayat Muhammad Khan Pano  
**ATTES/ED**



امدن و اخراجات (2015)

گواہت (کنزیمون) ماڈل سکول حیات محمد خیل

رج ۱۲ ۶ ڈسٹریکٹ (انٹروین)

شرح شدہ رقم =

تاریخیں۔ رج شدہ رقم =

RS. 91838/- 18-08-2015

مذکورہ رقم B/W کمر میں آئی رقم سے زائد

کھی جس پر رینٹ وروین ہوا

تکسٹ پر لوات =

22/8/2015 سکول میں رینٹ وروین کا کام ہوا۔ رسیدات

طوائے تصدیق ہمراہ لے۔

22/8/15

Head Mistress  
G.C.M.C  
Hayat Muhammad the 2nd

ATTESTED



گورنمنٹ ہسپتال  
2014

3717

گورنمنٹ ہسپتال کی سروس کے تحت حاصل ہونے والے

تعداد	مبلغ	تعداد	مبلغ	تعداد	مبلغ	تعداد	مبلغ
3	987500/-	5	5000/-	5	5000/-	1	5000/-
5	" "	"	"	"	"	"	"
2	" "	"	540/-	"	540/-	"	540/-
8	" "	(6)	87000/-	87000/-	17350/-	150	87000/-
9	" "	"	13500/-	13500/-	3500/-	49	3500/-
10	" "	"	16000/-	16000/-	5000/-	"	5000/-
11	" "	"	3072/-	3072/-	72/-	120	72/-
12	" "	"	800/-	800/-	80/-	"	80/-
13	" "	"	800/-	800/-	72/-	2	72/-
14	" "	7	139500/-	139500/-	39500/-	15	39500/-

COLLECTED

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تفصیل آمدن و



سلا	تعداد	قیمت	ملاحظات	سلا	تعداد	قیمت	ملاحظات
24	24	4800/-	4800/-	7	15	987500/-	موتور پمپ
25	25	33000/-	33000/-	8	16	" "	" "
26	26	474022/-	60 لبر ای سمٹ				
27	27	60 لبر ای سمٹ	60 لبر ای سمٹ				
28	28	65000/-	65000/-	1	17	987500/-	موتور پمپ
29	29	19000/-	19000/-	"	18	" "	" "
30	30	21450/-	21450/-	"	19	" "	" "
31	31	25500/-	25500/-	"	20	" "	" "
32	32	15000/-	15000/-	"	21	" "	" "
33	33	9100/-	9100/-	"	22	" "	" "
		350/-	350/-				

ATTESTED





تفصیل آمدن و خرچ

بیل آمدن و خرچ

گورنمنٹ ہسپتال ایف ایم ایس حیات آباد خیبر پختونخوا

تعداد	بیل آمدن و خرچ	بیل آمدن و خرچ	بیل آمدن و خرچ	بیل آمدن و خرچ	بیل آمدن و خرچ	بیل آمدن و خرچ
4	98750/-					4
1	380/-	380/-	بیل	1	24	4
1	250/-	250/-	بیل	1	25	33
2	350/-	350/-	بیل	2	26	474
4	290/-	290/-	بیل	4	27	10
4	480/-	480/-	بیل	4	28	بیل
2	1200/-	1200/-	بیل	2	29	1
=	43080/-	43080/-	بیل	=	30	65
-	40190/-	40190/-	بیل	-	31	19
						83
						39
1	2500/-	2500/-	بیل	1	32	25
5	150/-	150/-	بیل	5	33	150
	259140/-					250
						9100

ATTESTED

تفصیل آموں و شرح



گورنمنٹ (کنسی ایلم ایس) حیات پور ضلع بنوں

کے اندر

کام

نمبر شمار	نمبر اد	کل رقم	اسد بند	اسد بند	کل رقم	نمبر شمار
46	11 عدد	4400/-	4400/-	1	987500/-	
47	1	1	1	1	"	34
48	1 عدد	500/-	500/-	"	"	35
49	1 عدد	250/-	250/-	"	"	36
50	2 عدد	20	20	"	"	37
51	2 عدد	1400/-	1400/-	"	"	38
52	1 عدد	30/-	30/-	"	"	39
53	3 عدد	105/-	105/-	"	"	40
53	3 عدد	210/-	210/-	"	"	41
54	3 عدد	255/-	255/-	"	"	42
55	5 عدد	150/-	150/-	"	"	43
56	2 عدد	7320/-	7320/-	"	"	44
57	1	3000/-	3000/-	"	"	45
58		10320/-				

ATTESTED

آمن و خروج  
کلاس

گفتار آمین و خروج  
کلاس

گفتار آمین و خروج  
گفتار آمین و خروج

عدد 1	1700/-	1750/-	عدد 2	11	46
عدد 2	500/-	800/-	عدد 3	11	47
عدد 3	250/-	250/-	عدد 4	11	48
عدد 4	1000/-	1000/-	عدد 5	11	49
عدد 5	1000/-	1000/-	عدد 6	11	50
عدد 6	2600/-	2600/-	عدد 7	11	51
عدد 7	600/-	600/-	عدد 8	11	52
عدد 8	200/-	200/-	عدد 9	11	53
عدد 9	3400/-	1700/-	عدد 10	11	54
عدد 10	4200/-	1700/-	عدد 11	11	55
عدد 11	860/-	860/-	عدد 12	11	56
عدد 12	350/-	350/-	عدد 13	11	57
عدد 13	510/-	510/-	عدد 14	11	58
عدد 14	1300/-	1300/-	عدد 15	11	59
عدد 15	1000/-	1000/-	عدد 16	11	60

ATTESTED

تعمیر امن و خروج



2015

گورنمنٹ (پرائیویٹ) ایئر لائنز، جنرل منیجر، جنرل ایئر لائنز

گورنمنٹ  
پرائیویٹ  
ایئر لائنز

نمبر	تعداد	قیمت	تفصیل	نمبر	قیمت	تفصیل
					987500/-	
69	5 عدد	3000/-	5 عدد ہائیڈرو فون + کوریج ٹارگٹ + 5 عدد ہائیڈرو فون	5	"	59
70	—	340/-	340/-	"	"	60
		3340/-				
71	5 عدد	7500/-	5 عدد ہائیڈرو فون + کوریج ٹارگٹ + 5 عدد ہائیڈرو فون	6	"	61
72	5 عدد	8250/-	5 عدد ہائیڈرو فون + کوریج ٹارگٹ + 5 عدد ہائیڈرو فون	7	"	62
	5 عدد	8500	5 عدد ہائیڈرو فون + کوریج ٹارگٹ + 5 عدد ہائیڈرو فون	8	"	63
73	1 عدد	14000/-	1 عدد ہائیڈرو فون + کوریج ٹارگٹ + 5 عدد ہائیڈرو فون	9	"	64
		1000/-	1000/-	"	"	
		5000/-	5000/-	10	"	65
74				"	"	
		200/-	200/-	"	"	66
75		5700/-	5700/-	"	"	
		6000/-	6000/-	11	"	67
76		6000/-	6000/-	"	"	
		6000/-	6000/-	"	"	68

ATTESTED

کفیل احمد خان صاحب  
2015



43 23

کفیل احمد خان صاحب  
2015

شماره	مبلغ	تاریخ	مبلغ	تاریخ	توضیحات
شماره 2	40000/-	2015	40000/-	12	کفیل احمد خان صاحب
شماره 3	8000/-	2015	8000/-	11	کفیل احمد خان صاحب
شماره 4	23560/-	2015	23560/-	11	کفیل احمد خان صاحب
شماره 5	40000/-	2015	40000/-	11	کفیل احمد خان صاحب
شماره 6	10000/-	2015	10000/-	11	کفیل احمد خان صاحب
شماره 7	24000/-	2015	24000/-	11	کفیل احمد خان صاحب
شماره 8	26400/-	2015	26400/-	7	کفیل احمد خان صاحب

ATTESTED

آمن و خروج  
تفصیل



گوانڈیٹ رولز ۱۹۷۷ ایچ ایس جیٹس فی خیل بنوں

نمبر	مقدار	قیمت	مقدار	قیمت	نمبر
89	2615	900/-	900/-	1	987500/-
					2 خاکی چوڑا
		318/-	318/-	//	//
90	3	240/-	240/-	//	//
					3 ٹوبوں
	16	220/-	220/-	//	//
					4 ٹوبوں
91	4	520/-	520/-	//	//
92	2	240/-	240/-	//	//
					2 ٹوبوں
93	2	320/-	320/-	//	//
					2 خاکی چوڑا
94	4	80/-	80/-	//	//
					4 ٹوبوں
95	6	600/-	600/-	//	//
					6 ٹوبوں
96	2	100/-	100/-	//	//
					2 ٹوبوں
97		3500/-	3500/-	//	//
					3 ٹوبوں
98		500/-	500/-	//	//
					5 ٹوبوں

91835

ATTESTED

تفصیل آمدن



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ان و خیر

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گواہی از سوی اہم السہات تقدیر فی خیل بنوں

ردیف	مبلغ اول	مبلغ دوم	تعداد	شرح	ردیف	مبلغ اول	مبلغ دوم	تعداد	شرح
71			987500/-	کل رقم	71			2	71
72	20/-	20/-	1	سدرتین پیپ	72	150	150/-	3	3
73	150	150/-	1	مرد اجالی	73	20	20/-	1	1
74	20	20/-	1	مرد اجالی	74	100/-	100/-	2	2
75	20	20/-	1	سدرتین پیپ	75	100	100/-	2	2
76	20	20/-	1	سدرتین پیپ	76	100	100/-	2	2
77	20	20/-	1	سدرتین پیپ	77	100	100/-	2	2
78	20	20/-	1	سدرتین پیپ	78	100	100/-	2	2
79	20	20/-	1	سدرتین پیپ	79	100	100/-	2	2
80	20	20/-	1	سدرتین پیپ	80	100	100/-	2	2
81	20	20/-	1	سدرتین پیپ	81	100	100/-	2	2
82	20	20/-	1	سدرتین پیپ	82	100	100/-	2	2
83	20	20/-	1	سدرتین پیپ	83	100	100/-	2	2
84	20	20/-	1	سدرتین پیپ	84	100	100/-	2	2
85	20	20/-	1	سدرتین پیپ	85	100	100/-	2	2
86	20	20/-	1	سدرتین پیپ	86	100	100/-	2	2
87	20	20/-	1	سدرتین پیپ	87	100	100/-	2	2
88	20	20/-	1	سدرتین پیپ	88	100	100/-	2	2
89	20	20/-	1	سدرتین پیپ	89	100	100/-	2	2
90	20	20/-	1	سدرتین پیپ	90	100	100/-	2	2
91	20	20/-	1	سدرتین پیپ	91	100	100/-	2	2
92	20	20/-	1	سدرتین پیپ	92	100	100/-	2	2
93	20	20/-	1	سدرتین پیپ	93	100	100/-	2	2
94	20	20/-	1	سدرتین پیپ	94	100	100/-	2	2
95	20	20/-	1	سدرتین پیپ	95	100	100/-	2	2
96	20	20/-	1	سدرتین پیپ	96	100	100/-	2	2
97	20	20/-	1	سدرتین پیپ	97	100	100/-	2	2
98	20	20/-	1	سدرتین پیپ	98	100	100/-	2	2
99	20	20/-	1	سدرتین پیپ	99	100	100/-	2	2
100	20	20/-	1	سدرتین پیپ	100	100	100/-	2	2

150 / 150 / 50000/-

ATTESTED

46  
26  
OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) TANK



Dated Tank the 21<sup>st</sup> / 11 / 2019

ANNEX C

INQUIRY REPORT

AUTHORITY:

Referring to the Deputy Director (Establishment) ESSE Khyber Pakhtunkhwa No. 1111/1/2019 regarding complaint General Order/2019 regarding my nomination as Inquiry Officer.

PRICE HISTORY:-

As per records I visited the GGCMS Hayat Muhammad Khel Bannu on 10 & 11-11-2019 to check the complaint moved about the allegations of financial embezzlements against the following officials

- a) Mst. Shahzad Hameed Ex. Head Mistress GGCMS Hayat Muhammad Khel Bannu
- b) Mst. Gul Sherin Ex. Head Mistress GGCMS Hayat Muhammad Khel Bannu

FINDINGS OF INQUIRY:-

*Annex C*  
*DEO Tank*

1) According to the bank statements, credited / debit record of ITA GGCMS Hayat Muhammad Khel Bannu bearing Account No. 4044766250 & Account No. 4083816837 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 missing facilities at the said School.

2) According to the written statement of Mst. Gul Sherin Ex. Headmistress GGCMS Hayat Muhammad Khel Bannu She stated that while she posted at the said School served w.e.f 01-11-2014 till 15-01-2015, received the following funds, which were utilized through the support of Chowkidar of School within the following breakup.

- a) She stated that Rs. 200000/- (Rupees Two Lacs) has been withdrawn on 17<sup>th</sup> 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/Latrines.
- 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

*ATTESTED*



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ground floor of Verandah, one bulwark for Chowkidar, colored and decorate the School through panallexes, 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 GGCMS Hayat Muhammad Khel vide DEO (F) Bannu Order Endstr: No. 6937-39 Dated 15-09-2015.
- 3 According to the written statement of DEO (F) Bannu and Mst. Shahana Hameed Ex. Headmistress GGCMS Hayat Muhammad Khel & perusal of connected documents, the said Headmistress join the GGCMS Hayat Muhammad Khel later on 15-09-2015 and the remaining amount is utilized in her tenure.
- 4 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 GGCMS 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 GGMS Hayat Muhammad Khel, the Inquiry Officer is of humble view that the complaint moved against financial embezzlement in said School does not supported by the available utilization record and physically 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

Endstr:No 7682 /

**Copy to the:-**

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

District Education Officer  
(Male) Tank

~~ATTACHED~~

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- اس میں اس کے ساتھ  
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ANNEX "D"



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
KARAK

Phone: 0927-291177  
Address :KDA Karak  
Email:deof emalekarak@yahoo.co

No. 07

To

Dated Tank the: - 21 / 11 / 2019

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).

Shazia Nawaz  
DDEO (F) Karak /Enquiry Officer.

~~ATTESTED~~

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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 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

ATTESTED

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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 GCMS and GGMS Hayat Muhammad Khel Bannu which are recoverable.

**ATTESTED**

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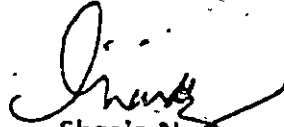
380000/- has been misused by Mst Shahana Hameed ASDEO establishment O/O DEO (Female) Bannu she has also been misused her authority and violated the financial procedure.

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.

**ATTESTED**



3252  
ANNEX E  
OFFICE OF THE

DISTRICT EDUCATION OFFICER (FEMALE) BANNU.

NO. 3679-811

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.

*Sunay*  
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.

ATTESTED

## بخدمت جناب DEO(F) زنانہ مدارس ضلع بنوں

تھروپراپر چینل

**عنوان :** دفاع بابت ریکوری

**جناب عالی :-**

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

**جناب عالی :-**

سائلہ کی کمپلیٹ اور ڈائریکٹریٹ E&SE کے فیصلہ روشنی میں سائلہ نے سول سرونٹ روڈز کے تحت سیکرٹری E&SE کو ذیل 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 تاہی کارروائی نہ کی جائے امید ہے کہ ہماری گزارش پر غور کیا جائے گا اور ہمیں شکریہ کا موقع دیا جائے گا۔

ع

گل شیرین

گورنمنٹ گرلز ہائی سکول بڈامیر عباس

15/07/2021

ATTESTED

54 34

Handwritten notes and signatures at the top right of the page.



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: Shahna 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 1937-23 DEO (F)

Dated; 15/08/2015

Copy to the;

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

Distt; Education Officer (F)  
Bannu

Handwritten notes and signatures in the bottom left corner.

**ATTESTED**



رپورٹ کی روشنی میں سکول  
انتظامیہ نے جو کارروائی کی

زائے / رپورٹ میمانہ

visit report

visited the GEMS &  
GEMS. Hayat Muhammed Khal  
Bennu 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 in  
Veranda were also repaired  
& major portion of the yard  
was found repaired. The  
allegations levelled against  
the school authorities were  
found baseless.

ATTESTED

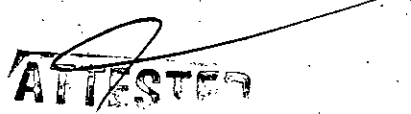
رپورٹ کی روشنی میں سکول  
انتظامیہ نے جو کارروائی کی۔

رائے / رپورٹ معائنہ

As far as the role of MSA Shikana  
EX HMA 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  
Deshacharya  
District Education Office  
(Female) Bannu

  
ATTESTED

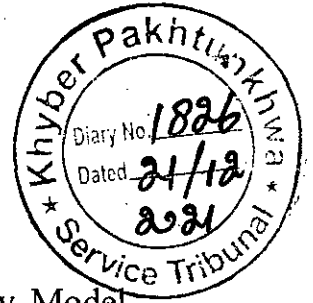
59

07/01

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

Service Appeal No. 7755/2021



Gul Shereen SST (G) at Government Girls Community Model School Hayat Muhammad Khel Bannu.

*Put up to the court with relevant app. - u. waiting chair - u.*

**(Appellant)**

**VERSUS**

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

*Reader*  
*21/12/21*

**(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**

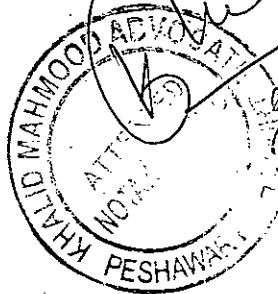
I, Gul Shereen SST (G) at Government Girls Community Model School Hayat Muhammad Khel Bannu., do hereby solemnly affirm and declare on oath that contents of the accompanied application are true and correct to the best my knowledge and belief.

Identified by

*Zartaj Anwar*  
**ZARTAJ ANWAR**  
Advocate High Court

*Gul Shereen*  
**DEPONENT**

CNIC No.





**OFFICE OF THE DISTRICT EDUCATION OFFICER,**  
**(FEMALE) KARAK**

No. 5536 / Dated Karak the 26/11 /2021.

To

The District Education Officer  
(Female )Bannu.

SUBJECT:- INQUIRY.

Memo,

It is stated that I the undersigned and Razwana Liaqat DEO(F) Kohat appointed as inquiry Officers vide SO (Complaint) E&SED/1-17/2021/ASDEO (F) Estb:Bannu /SE-2320 dated 13.9.2021.


The Undersigned and Razwana Liaqat DEO(F) Kohat will visit your Office regarding inquiry against Ms. Gul Shareen Head Mistress GGCMS Hayat Muhammad Khel and Ms.Shahana Ex ASDEO Estb:of your Office on 30.11.2021.You are requested to inform the above named Officer to be present at your Office for formal inquiry as the matter is already inquired by Shazia Nawaz Ex Dy : DEO(F) Karak.

DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst.No. 5537-39 / Dated Karak the 26/11 /2021.

Copy to the: \_

1. Sectionn Officer (Complaint) Elementary and Secondary Education Khyber Pakhtunkhwa w/r to his Office No & date cited above.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Hayat Khan S/of Gul Khazanat Khan resident of Hayat Muhammad Khel District Bannu .

  
 DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK.



83

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

No. SO (PE/E&SED/5-1/Gen-Misc/Shahana Hameed/2021  
Dated Peshawar (P.E), October 25<sup>th</sup>, 2021

To

Mst. Shahana Hameed,  
SST (G), GOHS No.02,  
District Bannu.

Subject: - PERSONAL HEARING.

I am directed to refer to your application dated 24.08.2021 on the subject noted above and to state that your personal hearing is scheduled to be held on 02.11.2021 at 11:00 hours with Special Secretary, Elementary & Secondary Education Department Khyber Pakhtunkhwa in his office.

You are, therefore, directed to appear before Special Secretary, E&SE Department, for personal hearing alongwith complete documents, on the date, time and venue mentioned above.

  
(Mian Hussain Din)  
SECTION OFFICER (P.E)

Endst: No & date even  
Copy forwarded to the :-

1. Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar, with the request to depute a well conversant representative to attend the personal hearing as mentioned above, alongwith complete record pertaining to the case.
2. District Education Officer (F), Bannu.
3. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
4. PA to Additional Secretary (General) Elementary & Secondary Education Department Khyber Pakhtunkhwa.

  
SECTION OFFICER (P.E)



64  
**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE**

**BANNU ELEMENTARY & SECONDARY EDUCATION**

**KHYBER PAKHTUNKHWA**

Address: Outside Airyan Gate near GHS No.4 Bannu City

PH No. 0928-660079, 660346, Fax 928-660005

E-mail: emisbannu@yahoo.com

No 9072/1

Dated Bannu the, 12/12/2022

To

**The Director (E&SE) Khyber Pakhtunkhwa,  
Peshawar.**

**Subject: RECOVERY FROM GUL SHEREEN SST (EX-HM GGMS, HAYAT MUHAMMAD  
KHEL & SHAHANA HAMEED EX-ADE) (ESTABSHT) OF DEO (F)  
BANNU/COMPLAINT AGAINST MST SHAHANA, ASDEO & GUL SHIREEN  
SST AND OTHERS**

Memo:

Reference (PCP) No.FP 101221-89427787 (4B) Dated 10/12/2021/ per various complaints received through Citizen Portal and enquiry recommendation/ letter received from the Director (E&SE) Department Khyber Pakhtunkhwa Peshawar No.2114-19 dated 02/09/2020 & NO. 5778/FILE NAB/15-02/COMPLAINT CELL/2022 DATED PESHAWAR THE 01/11/2022, Endst: No. DAO/Admr-1/BU/2021-2022/181-85 dated 23/11/2021 & Endst: No. vide this office Endst: No. 11862-63 dated 02/11/2022( COPY ATTACHED ANNEX-A) on the above cited subject.

In response of the above references, Mst: Gul Shereen SST (G) GGHS, Bada Mir Abbas Bannu has submitted her reply through proper channel with the justification as mentioned in the context of the letter (COPY ATTACHED ANNEX B). It is requested that the case may be furnished to the quarter concerned for intimation accordingly. It is revealed that the KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR HAS PASSED ITS ORDER" NOT TO MAKE ANY RECOVERY FROM THE ALLEGED TEACHER TILL FURTHER DECISION" (COPY ATTACHED ANNEX C).

It is further added that Mst: Shahana Hameed SST GGHS, Rashid Mandi Baka Khel has not submitted her reply so far.


So, reply/report in this regard is hereby submitted for further decision

  
DISTRICT EDUCATION OFFICER  
(FEMALE) BANNU

Endst: No \_\_\_\_\_ / Dated Bannu the, \_\_\_\_\_ /2022

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

1. Deputy Commissioner Bannu.
2. District Accounts Officer Bannu
3. P.S Secretary to Government of (E&SED) Peshawar.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) BANNU



**OFFICE OF THE DISTRICT EDUCATION OFFICER,**  
**(FEMALE) KARAK**

65

No. 5536 / Dated Karak the 26/11 /2021.

To

The District Education Officer  
(Female) Bannu.

SUBJECT: INQUIRY.

Memo,

It is stated that I the undersigned and Razwana Liaqat DEO(F) Kohat appointed as inquiry Officers vide SO (Complaint) E&SED/1-17/2021/ASDEO (F) Estb:Bannu /SE-2320 dated 13.9.2021.

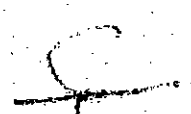
The Undersigned and Razwana Liaqat DEO(F) Kohat will be visited your Office regarding inquiry against Ms. Gul Shareen Head Mistress GGCMS Hayat Muhammad Khel and Ms. Shahana Ex ASDEO Estb:of your Office on 30.11.2021. You are requested to inform the above named Officer to be present at your Office for formal inquiry as the matter is already inquired by Shazia Nawaz Ex Dy : DEO(F) Karak.

DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst:No. 5537-39 / Dated Karak the 26/11 /2021.

Copy to the: \_

1. Sectionn Officer (Complaint) Elementary and Secondary Education Khyber Pakhtunkhawa w/r to his Office No & date cited above.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Hayat Khan S/of Gul Khazanat Khan resident of Hayat Muhammad Khel District Bannu .

  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK.





**Office of The District Education Officer  
Male Lakki Marwat**

Ph: (0969)538291 email: [emislakki@yahoo.com](mailto:emislakki@yahoo.com)  
www.facebook.com/deomalelakki, www.twitter.com/deo\_m\_lakki

No. 3552 Dated. 04/05/2023

To  
The District Education Officer  
(Female) Bannu.

Subject: **NOTIFICATION/ENQUIRY.**

With reference to the Secretary to Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Notification No. NAB/SO (Comp) E&SED/1-18/2021/ASDEO (F) Estab: Bannu/SE-4303 dated. 31-03-2023, regarding de-novo inquiry against Ms Gul Sherin Headmistress GGCMS Hayat Muhammad Khel and Ms Shahna ASDEO (Estab:) DEO Female Office Bannu in connection with embezzlement in PTC fund and to inform you that the undersigned is scheduled to visit your office in connection with the above cited inquiry on **08-05-2023 (Monday).**

You are, therefore, requested to ensure presence of all concerned including Ms Gul Sherin Headmistress GGCMS Hayat Muhammad Khel and Ms Shahna ASDEO (Estab:) DEO Female Office Bannu and provide the following documents to the undersigned on the day of visit.

1. Release of Conditional Grant/PTC Fund to the school concerned w.e.f 2104-2019.
2. Bank Statement for 2014-2019 from concerned school.
3. PTC record (Minutes Register/Income Expenditure Register/Stock Register)
4. Vouchers of Expenditures signed by all concerned.
5. Work completion Report as per Released Amount.
6. Consultant Report regarding Uplift works in school.
7. Any other relevant documents.

**Inquiry Officer/  
District Education Officer  
(Male) Lakki Marwat**

Even No. & Dated  
Copy to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Lakki Marwat with the request that the undersigned will be considered as on duty on the above cited date and Mr Gul Faraz Deputy DEO (M) Local Office will look after office matters on the above mentioned date.

District Education Officer  
(Male) Lakki Marwat



67  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No.NAB/SO(C.)E&SED/1-18/2021/NABKP2740127671/SE-4303

Dated:25.10.2022

To

The Director,  
Directorate of Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar

Subject: COMPLAINT AGAINST MST. SHAHANA, ASDEO, EDUCATION OFFICE (F),  
BANNU: MST. GUL SHIREEN, SST AND OTHERS

I am directed to refer to the subject noted above and to enclose herewith copy of a letter No. SOE-V/E&AD/2-1/NAB/2022/Case No. 674/21 dated 11.10.2022, received from Section Officer E-V, Establishment Department along with its enclosures, with the request to inquire the matter and report may be submitted to this office within fortnight positively, for onward submission to the quarter concerned, please.

Encl: As Above:

  
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

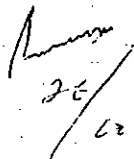
Copy of the above is forwarded to the:

1. DEO (F), Bannu for similar necessary action.
2. Section Officer (E-V), Establishment Department (Establishment Wing) Khyber Pakhtunkhwa Peshawar.
3. PA to Deputy Secretary (Monitoring), E&SE Department, Peshawar for information

SECTION OFFICER (COMPLAINT)

Co  
37/10/22

ADDE (PE)

  
26/10/22

10/22



Office of The District Education Officer  
(Male) Lakki Marwat

Ph: (0969)538291, (0969)709234, Fax: (0969)538292,  
email: emislakki@yahoo.com

**QUESTIONNAIRE**

**For DEO (Female) Bannu in connection with the De-novo Inquiry  
Against Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad  
Khel & Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu.**

- Q.1:** Your good name and designation, please?
- Q.2:** Your date of taking over charge against the post of DEO (F) Bannu?
- Q.3:** When were GGCMS/GGMS Hayat Muhammad Khel Boundary wall reported damaged?
- Q.4:** What precautionary measures were taken for the mentioned school/schools without a Boundary Wall and being a Girls School?
- Q.5:** What was the Water Supply source in the mentioned school/schools?
- Q.6:** Please provide detail of Conditional Grant Release detail to the above mentioned school/schools w.e.f. 2104 – 2019.
- Q.7:** Provide detail of funds other than Conditional Grant, transferred to PTC Accounts of GGCMS and GGMS Hayat Muhammad Khel w.e.f. 2014 – 2019.
- Q.8:** Who was the then DEO (Female) Bannu and ADEO (P&D) who recommended Conditional Grant allocation for GGCMS and GGMS Hayat Muhammad Khel?
- Q.9:** Were all codal formalities fulfilled for the under question Conditional Grant Release to the mentioned schools? Provide any detail, please.
- Q.10:** How much is the total area of both the schools?
- Q.11:** Did any External Audit Party (Hired by Secretary E&SED) for Conditional Grant Programme, submitted monitoring report in this regard? If, Yes. Please attach.
- Q.12:** Was any Internal Audit Party constituted by DEO (F) Office, Bannu at that time regarding PTC Funds release in various heads to Girls Schools in the District.
- Q.13:** Any kind of PTC Funds release authority, issued to the mentioned schools during the period by DEO – Female Office. Please provide copy.
- Q.14:** Any other remarks or documents, you want to submit.

**District Education Officer  
(Male) Lakki Marwat**



69  
Office of The District Education Officer  
(Male) Lakki Marwat

Ph: (0969)538291, (0969)709234, Fax: (0969)538292,  
email: emislakki@yahoo.com

**QUESTIONNAIRE**

**For Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu**

**in connection with the De-novo Inquiry**

**Against Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad Khel**

**& Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu.**

- Q.1:** Your good name and designation, please?
- Q.2:** Your date of taking over charge against the post of Headmistress at GGCMS/ GGMS Hayat Muhammad Khel? Provide order copy.
- Q.3:** Whether you are recruited against the post of SST by Initial Appointment Or otherwise? Provide documentary proof.
- Q.4:** When was GGCMS/GGMS Hayat Muhammad Khel Boundary wall reported damaged to DEO (Female) Office? Provide copy of the report.
- Q.5:** What were the alternate arrangements, taken for the mentioned school/schools without a Boundary Wall being head of a Girls School?
- Q.6:** What was the Water Supply source in the mentioned school/schools, when you took over charge as Headmistress in the mentioned school?
- Q.7:** Please provide detail of Conditional Grant Release to the above mentioned school/schools w.e.f. 2104 – 2019 under your kind control.
- Q.8:** Provide detail of funds, other than Conditional Grant, transferred to PTC Accounts of GGCMS Or GGMS Hayat Muhammad Khel w.e.f. 2014 – 2019 under your control.
- Q.9:** Who was the then DEO (F) and ADEO (P&D), who recommended Conditional Grant allocation for GGCMS and GGMS Hayat Muhammad Khel?
- Q.10:** Were all codal formalities fulfilled for the under question Conditional Grant Release to the mentioned schools under your control? If, Yes, provide Documentary proofs i.e. duly attested copies of PTCs Resolutions and other relevant documents
- Q.11:** How much is the total area of both the schools i.e. GGCMS Or GGMS Hayat Muhammad Khel, having a single Boundary Wall?
- Q.12:** Did any External Audit Party (Hired by Secretary E&SED) visited the school under your control? If, Yes, please provide any report. (If you have).
- Q.13:** Was any Internal Audit Party constituted by DEO (F) Office, Bannu regarding PTC Funds release in various heads to Girls Schools in the District, visited the school under your control?
- Q.14:** Is it true that you have served as Headmistress as well as ASDEO (Estab) in DEO (Female) Office, Bannu? If, Yes. Please provide the Notification in this regard, issued by the competent authority.
- Q.15:** Any other remarks or documents, you want to submit.
- Q.16:** How much fund has been utilized during your service in the school/schools?
- Q.17:** Provide PTC Committee members detail alongwith Chairperson's sons/Daughters.



70  
Office of The District Education Officer  
(Male) Lakki Marwat

Ph: (0969)538291, (0969)709234, Fax: (0969)538292,  
email: emislakki@yahoo.com

**QUESTIONNAIRE**

**For Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad Khel**

**in connection with the De-novo Inquiry**

**Against Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad Khel**

**& Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu.**

- Q.1:** Your good name and designation, please?
- Q.2:** Your date of taking over charge against the post of Headmistress at GGCMS/ GGMS Hayat Muhammad Khel? Provide order copy.
- Q.3:** Whether you are recruited against the post of SST by Initial Appointment Or otherwise? Provide documentary proof.
- Q.4:** When was GGCMS/GGMS Hayat Muhammad Khel Boundary wall reported damaged to DEO (Female) Office? Provide copy of the report.
- Q.5:** What were the alternate arrangements, taken for the mentioned school/schools without a Boundary Wall being head of a Girls School?
- Q.6:** What was the Water Supply source in the mentioned school/schools, when you took over charge as Headmistress in the mentioned school?
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- Q.8:** Provide detail of funds, other than Conditional Grant, transferred to PTC Accounts of GGCMS Or GGMS Hayat Muhammad Khel w.e.f. 2014 – 2019 under your control.
- Q.9:** Who was the then DEO (F) and ADEO (P&D), who recommended Conditional Grant allocation for GGCMS and GGMS Hayat Muhammad Khel?
- Q.10:** Were all codal formalities fulfilled for the under question Conditional Grant Release to the mentioned schools under your control? If, Yes, provide Documentary proofs i.e. duly attested copies of PTCs Resolutions and other relevant documents
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- Q.13:** Was any Internal Audit Party constituted by DEO (F) Office, Bannu regarding PTC Funds release in various heads to Girls Schools in the District, visited the school under your control?
- Q.14:** Is it true that you have served as Headmistress at GGCMS & GGMS Hayat Muhammad Khel? If, Yes. Please provide the Notification/Office Order in this regard, issued by the competent authority.
- Q.15:** Any other remarks or documents, you want to submit.
- Q.16:** How much fund has been utilized during your service in the school/schools?
- Q.17:** Provide PTC Committee members detail alongwith Chairperson's sons/Daughters.



71  
**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE**

**BANNU ELEMENTARY & SECONDARY EDUCATION**

**KHYBER PAKHTUNKHWA**

Address: Outside Miryan Gate near GHS No.4 Eannu City

PH No. 0928-660079, 660346, Fax 928-660005

E-mail: emisbanu@yahoo.com

No 9072/1

Dated Bannu the, 12/12 /2022

To

**The Director (E&SE) Khyber Pakhtunkhwa,  
Peshawar.**

**Subject: RECOVERY FROM GUL SHEREEN SST (EX-HM GGMS, HAYAT MUHAMMAD  
KHEL & SHAHANA HAMEED EX-ADE) (ESTABSHT) OF DEO (F)  
BANNU/COMPLAINT AGAINST MST SHAIANA, ASDEO & GUL SHIREEN  
SST AND OTHERS**

Memo:

Reference (PCP) No. P 101221-89427787 (4B) Dated 10/12/2021/ per various complaints received through Citizen Portal and enquiry recommendation/ letter received from the Director (E&SE) Department Khyber Pakhtunkhwa Peshawar No.2114-19 dated 02/09/2020 & NO. 5778/FILE NAB/15-02/COMPLAINT CELL/2022 DATED PESHAWAR THE 01/11/2022, Endst: No. DAO/Admr-1/BU/2021-2022/181-85 dated 23/11/2021 & Endst: No. vide this office Endst: No. 11862-63 dated 02/11/2022( COPY ATTACHED ANNEX-A) on the above cited subject.

In response of the above references, Mst: Gul Shereen SST (G) GGHS, Bada Mir Abbas Bannu has submitted her reply through proper channel with the justification as mentioned in the context of the letter (COPY ATTACHED ANNEX B). It is requested that the case may be furnished to the quarter concerned for intimation accordingly. It is revealed that the KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR HAS PASSED ITS ORDER" NOT TO MAKE ANY RECOVERY FROM THE ALLEGED TEACHER TILL FURTHER DECISION" (COPY ATTACHED ANNEX C).

It is further added that Mst: Shahana Hameed SST GGHS, Rashid Mandi Baka Khel has not submitted her reply so far.


So, reply/report in this regard is hereby submitted for further decision.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) BANNU

Endst: No \_\_\_\_\_ / Dated Bannu the, \_\_\_\_\_ /2022

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

1. Deputy Commissioner Bannu.
2. District Accounts Officer Bannu
3. P.S Secretary to Government of E&SED) Peshawar.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) BANNU



Office of The District Education Officer  
Male Lakki Marwat

Ph: (0969)538291 email: [emislakki@yahoo.com](mailto:emislakki@yahoo.com)  
[www.facebook.com/deomaleLakki](http://www.facebook.com/deomaleLakki), [www.twitter.com/deo\\_m\\_lakki](http://www.twitter.com/deo_m_lakki)

No. 3552 Dated. 04/05/2023

To: The District Education Officer  
(Female) Bannu.

Subject: **NOTIFICATION/ENQUIRY.**

With reference to the Secretary to Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Notification No. NAB/SO (Comp) E&SED/1-18/2021/ASDEO (F) Estab: Bannu/SE-4303 dated. 31-03-2023, regarding de-novo inquiry against Ms Gul Sherin Headmistress GGCMS Hayat Muhammad Khel and Ms Shahna ASDEO (Estab:) DEO Female Office Bannu in connection with embezzlement in PTC fund and to inform you that the undersigned is scheduled to visit your office in connection with the above cited inquiry on **08-05-2023 (Monday).**

You are, therefore, requested to ensure presence of all concerned including Ms Gul Sherin Headmistress GGCMS Hayat Muhammad Khel and Ms Shahna ASDEO (Estab:) DEO Female Office Bannu and provide the following documents to the undersigned on the day of visit.

1. Release of Conditional Grant/PTC Fund to the school concerned w.e.f 2104-2019.
2. Bank Statement for 2014-2019 from concerned school.
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4. Vouchers of Expenditures signed by all concerned.
5. Work completion Report as per Released Amount.
6. Consultant Report regarding Uplift works in school.
7. Any other relevant documents.

Inquiry Officer/  
District Education Officer  
(Male) Lakki Marwat

Even No. & Dated  
Copy to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Lakki Marwat with the request that the undersigned will be considered as on duty on the above cited date and Mr Gul Faraz Deputy DEO (M) Local Office will look after office matters on the above mentioned date.

District Education Officer  
(Male) Lakki Marwat



**OFFICE OF THE DISTRICT EDUCATION OFFICER,**  
**(FEMALE) KARAK**

No. 5536 / Dated Karak the 26/11 /2021.

To

The District Education Officer  
(Female) Bannu.

SUBJECT:- INQUIRY.

Memo,

It is stated that I the undersigned and Razwana Liaqat DEO(F) Kohat appointed as inquiry Officers vide SO (Complaint) E&SED/1-17/2021/ASDEO (F) Estb:Bannu /SE-2320 dated 13.9.2021.


The Undersigned and Razwana Liaqat DEO(F) Kohat will be visited at your Office regarding inquiry against Ms. Gul Shareen Head Mistress GGCMS Hayat Muhammad Khel and Ms. Shahana Ex ASDEO Estb:of your Office on 30.11.2021. You are requested to inform the above named Officer to be present at your Office for formal inquiry as the matter is already inquired by Shazia Nawaz Ex Dy : DEO(F) Karak.

DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst:No. 5537-39 / Dated Karak the 26/11 /2021.

Copy to the:

1. Sectionn Officer (Complaint) Elementary and Secondary Education Khyber Pakhtunkhwa w/r to his Office No & date cited above.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Hayat Khan S/of Gul Khazanat Khan resident of Hayat Muhammad Khel District Bannu .

  
 DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK.





74  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No.NAB/SO(C.)E&SED/1-18/2021/NABKP2740127671/SE-4303

Dated: 25.10.2022

To

The Director, ,  
Directorate of Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar

Subject: COMPLAINT AGAINST MST. SHAHANA, ASDEO, EDUCATION OFFICE (F),  
BANNU: MST. GUL SHIREEN, SST AND OTHERS

I am directed to refer to the subject noted above and to enclose herewith copy of a letter No. SOE-V/E&AD/2-1/NAB/2022/Case No. 674/21 dated 11.10.2022, received from Section Officer E-V, Establishment Department along with its enclosures, with the request to inquire the matter and report may be submitted to this office within fortnight positively, for onward submission to the quarter concerned, please.

Encl: As Above:

  
SECTION OFFICER (COMPLAINT)

Endst: of even number & date:

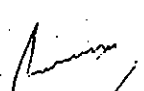
Copy of the above is forwarded to the:

1. DEO (F), Bannu for similar necessary action.
2. Section Officer (E-V), Establishment Department (Establishment Wing) Khyber Pakhtunkhwa Peshawar
3. PA to Deputy Secretary (Monitoring), E&SE Department, Peshawar for information

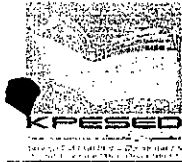
SECTION OFFICER (COMPLAINT)

cc  
27/10/22

ADDECPET

  
26/12

10/12/22



75

**Office of The District Education Officer  
(Male) Lakki Marwat**

Ph: (0969)538291, (0969)709234, Fax: (0969)538292,  
email: emislakki@yahoo.com

**QUESTIONNAIRE**

**For DEO (Female) Bannu in connection with the De-novo Inquiry  
Against Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad  
Khel & Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu.**

- Q.1:** Your good name and designation, please?
- Q.2:** Your date of taking over charge against the post of DEO (F) Bannu?
- Q.3:** When were GGCMS/GGMS Hayat Muhammad Khel Boundary wall reported damaged?
- Q.4:** What precautionary measures were taken for the mentioned school/schools without a Boundary Wall and being a Girls School?
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- Q.6:** Please provide detail of Conditional Grant Release detail to the above mentioned school/schools w.e.f. 2104 – 2019.
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- Q.10:** How much is the total area of both the schools?
- Q.11:** Did any External Audit Party (Hired by Secretary E&SED) for Conditional Grant Programme, submitted monitoring report in this regard? If, Yes. Please attach.
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- Q.14:** Any other remarks or documents, you want to submit.

**District Education Officer  
(Male) Lakki Marwat**



76  
Office of The District Education Officer  
(Male) Lakki Marwat

Ph: (0969)538291, (0969)709234, Fax: (0969)538292,  
email: emislakki@yahoo.com

**QUESTIONNAIRE**

**For Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu**

**in connection with the De-novo Inquiry**

**Against Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad Khel**

**& Ms. Shahana Ex-ASDEO (Estab) DEO-Female Office, Bannu.**

- Q.1:** Your good name and designation, please?
- Q.2:** Your date of taking over charge against the post of Headmistress at GGCMS/ GGMS Hayat Muhammad Khel? Provide order copy.
- Q.3:** Whether you are recruited against the post of SST by Initial Appointment Or otherwise? Provide documentary proof.
- Q.4:** When was GGCMS/GGMS Hayat Muhammad Khel Boundary wall reported damaged to DEO (Female) Office? Provide copy of the report.
- Q.5:** What were the alternate arrangements, taken for the mentioned school/schools without a Boundary Wall being head of a Girls School?
- Q.6:** What was the Water Supply source in the mentioned school/schools, when you took over charge as Headmistress in the mentioned school?
- Q.7:** Please provide detail of Conditional Grant Release to the above mentioned school/schools w.e.f. 2104 – 2019 under your kind control.
- Q.8:** Provide detail of funds, other than Conditional Grant, transferred to PTC Accounts of GGCMS Or GGMS Hayat Muhammad Khel w.e.f. 2014 – 2019 under your control.
- Q.9:** Who was the then DEO (F) and ADEO (P&D), who recommended Conditional Grant allocation for GGCMS and GGMS Hayat Muhammad Khel?
- Q.10:** Were all codal formalities fulfilled for the under question Conditional Grant Release to the mentioned schools under your control? If, Yes, provide Documentary proofs i.e. duly attested copies of PTCs Resolutions and other relevant documents.
- Q.11:** How much is the total area of both the schools i.e. GGCMS Or GGMS Hayat Muhammad Khel, having a single Boundary Wall?
- Q.12:** Did any External Audit Party (Hired by Secretary E&SED) visited the school under your control? If, Yes, please provide any report. (If you have).
- Q.13:** Was any Internal Audit Party constituted by DEO (F) Office, Bannu regarding PTC Funds release in various heads to Girls Schools in the District, visited the school under your control?
- Q.14:** Is it true that you have served as Headmistress as well as ASDEO (Estab) in DEO (Female) Office, Bannu? If, Yes. Please provide the Notification in this regard, issued by the competent authority.
- Q.15:** Any other remarks or documents, you want to submit.
- Q.16:** How much fund has been utilized during your service in the school/schools?
- Q.17:** Provide PTC Committee members detail alongwith Chairperson's sons/Daughters



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**Office of The District Education Officer  
(Male) Lakki Marwat**

Ph: (0969)538291, (0969)709234, Fax: (0969)538292,  
email: emislakki@yahoo.com

**QUESTIONNAIRE**

**For Ms. Gul Sherin Headmistress GGCMS Hayat Muhammad Khel**

**in connection with the De-novo Inquiry**

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- Q.15:** Any other remarks or documents, you want to submit.
- Q.16:** How much fund has been utilized during your service in the school/schools?
- Q.17:** Provide PTC Committee members detail alongwith Chairperson's sons/Daughters.



**GOVT. OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Phone#: 091- 9223538, Fax#: 091-9211419/9223538

78

Dated: 12-06-2023

**Subject: REPORT REGARDING COMPLAINT AGAINST MST SHAHANA, ASDEO EDUCATION OFFICE (F) BANNU: MST. GUL SHEERIN, SST AND OTHERS**

**Reference:** No SO (Com) E&SED/1-7/2021/Complaint against HM and ADEO Estab: Bannu dated Peshawar 22<sup>nd</sup> May 2023.

In reference to above mentioned subject, wherein complaint against ASDEO MST Shahana (Head of GGMS) and Gul Sheerin (SST and Head of GGPS) of Hayat Muhammad Khail within same boundary wall has been lodged by the

**ToR of the report**

Submission of report regarding Work done in the said school.

**RELEASES DETAILS**

Findings are split up in connection with Funds transferred and utilized by Head of GGPS, MST Gul Sheerin and Head of GGMS, MST Shahana, hence relevant details regarding Head of GGPS, MST Gul Sheerin is as under:

1. A sum of Rs 1,087,500/- was credited to her account which was drawn by her during August 2015, allocation and utilization is as under:

S.N	Funds amount	Allocation	Findings
1.	Rs 627,500/-	Amount released from DEO office was aimed for raising boundary wall without actual assessment.	1) Existing 421 ft long Boundary wall was 9 ft high and not needed raising keeping in view 8 ft height requirement from natural ground outside. However it has been raised 1 ft reaching 10 ft overall height, having plaster both sides of raised portion and fixing Barbed Wire. 2) Remaining amount has been utilized against construction Security Point over existing Lavatory Block. 3) Rs 91,833/- has been utilized against Paint work of 06 classrooms and Boundary wall.
2.	Rs 200,000/-	Water Supply	Instead of new Bore-well, Existing Bore well has been dug further facilitated with New Submersible machine and accessories. It is important to mention that the bore-well was observed operational.
3.	Rs 160,000	Amount released for Construction of Group Latrine.	Instead of construction Group latrine, existing 05 Nos Latrines along with sewerage accessories and Ground Water tank were renovated.
4.	Rs 100,000	Unknown head, utilized by Mst Gul Shireen upon her promotion to Head of GGMS during July 2016.	Rs 100,000/- amount utilized against Sports items.

2. A sum of Rs 400,000/- was credited to her account which was drawn by her during August 2016, allocation and utilization is as under:

S.N	Funds amount	Allocation	Findings
1.	Rs 160,000/ & 20,000/-	Amount released for Construction of Group Latrine. Rs 20,000/- were utilized against Internal electrification.	Amount utilized against single wash room along with Overhead Water tank over it. Rs 20,000/- were also utilized in electric appliances and repair of Stabilizer.



2.	Rs 120,000/-	Play area	Amount utilized against all requisites of play area i.e. See Saw, Slope, Monkey Bar and Swing. All were observed in operational status.
3.	Rs 100,000/-	Amount released in unknown Head	The amount utilized against stationary. Amount utilized against repair of furniture, paint work and stationary etc. Couldn't be verified as the work has been executed in past and considerable duration has lapsed.

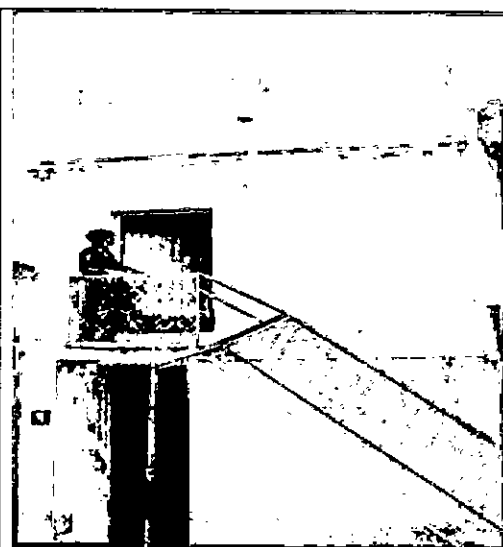
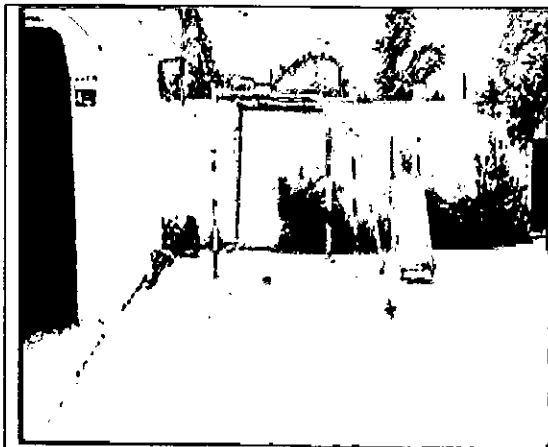
### ASSESSMENTS

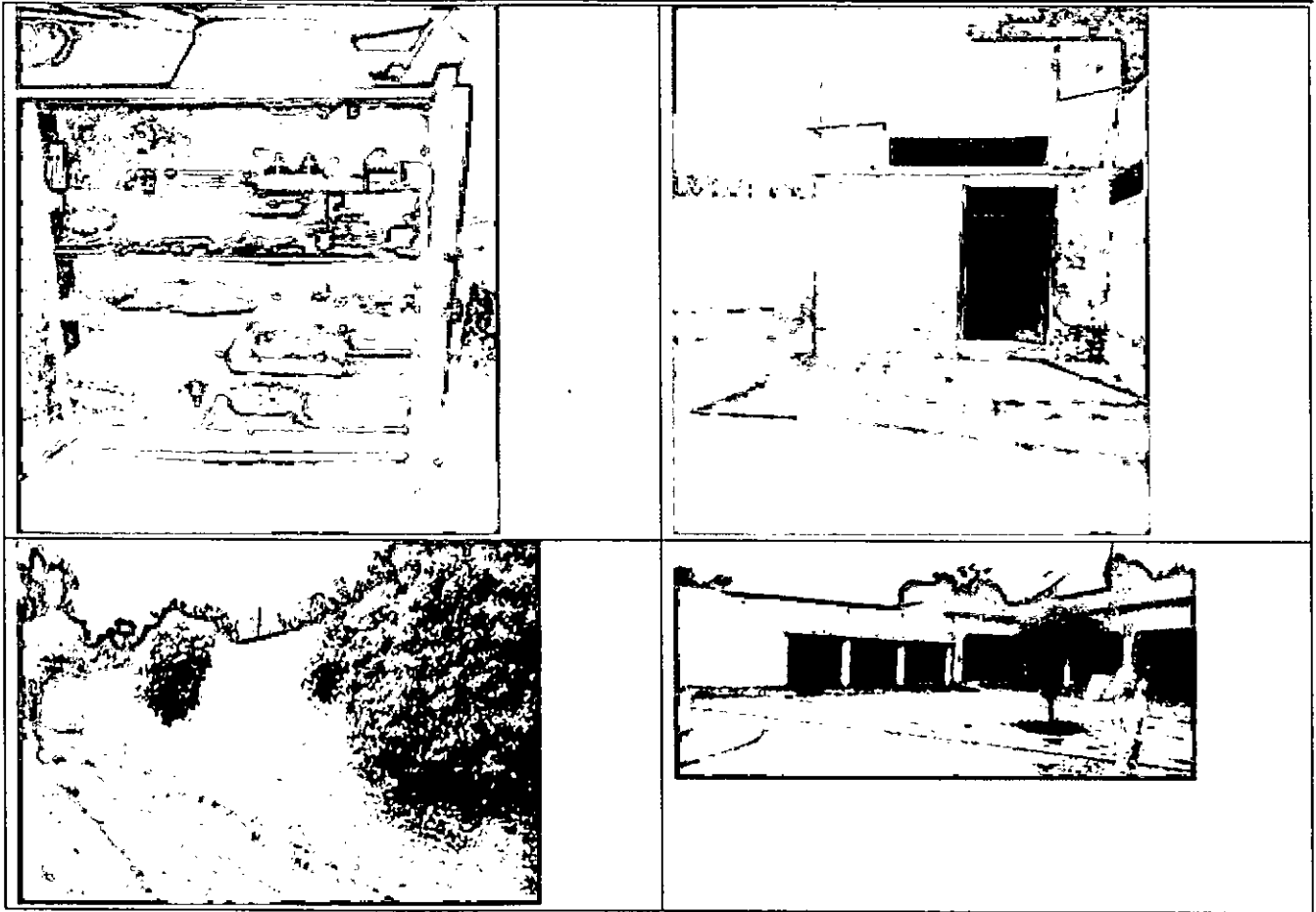
#### 1) GGPS Hayat Muhammad Khail under Head Mst Gul Shireen.

Particulars /Allocation Head	Expenses Shown	Expenses Assessed	Recovery	Remarks
Raising Boundary wall	474,022/-	438,635/-	35,386/-	As confessed by Mr Hayat (complainant) Bricks& cement were dealt by him, however the Nos of bricks shown found more than required. Hence a sum of Rs 27,960/- is recoverable from him.
Water Supply	259,140/-	212,526/-	46,614/-	Cost of submersible pump is on very high side.
Renovation of 05 Nos latrines and sewerage accessories.	76,530/-	56,326/-	20,203/-	Huge expenses shown in repair of Soakage pit and Septic tank.
		Total	102,203/-	i) Rs 74,243/- against Mst Gul Shireen ii) Rs 27,960/- against Mr Hayat (complainant)

#### 2) GGMS Hayat Muhammad Khail under Head Mst Shahana

Particulars /Allocation Head	Expenses Shown	Expenses Assessed	Recovery	Remarks
Group Latrine	160,000/-	111,860/-	48,140/-	As confessed by Mr Hayat (complainant), construction work has been carried out by him and conveyed in black and white, however the Head Mst Shahana can't be exonerated as due diligence has not been exercised on her part being Head.Hence recovery will be as under: i) Rs 24,070/- against Mst Shahana. ii) Rs 24,070/- against Mr Hayat (complainant)





Assessment Report is submitted for your kind information and necessary action as deemed by your good-self.

Yours Sincerely,

Engr. Jamshed Akram Kundi  
M & E Mardan & Kohat Divisions

Copy to:

- 1) PS to Secretary ESED Peshawar.
- 2) Additional Secretary (Development), E & SED Peshawar.
- 3) Chief M & E ESED.
- 4) SO Complaint in response to his letter quoted above.

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

SCANNED  
KPST  
Peshawar

Service Appeal No: 7755/2021

9/10/23


Mst. Gul Shereen, SST/ADEO District Bannu.....Appellant

**VERSUS**

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

**INDEX SHEET**

S/#	Description of document	Annexure	Pages No.
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

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



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

**SCANNED  
KPST  
Peshawar**

Service Appeal No: 7755/2021

Mst. Gul Shereen, SST/ADEO 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. 8198

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. 380000/- 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.

*Change  
page  
2*

- 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:-

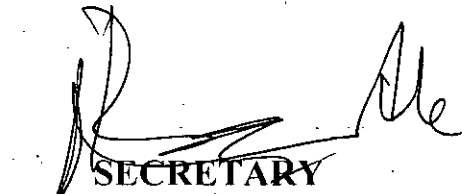
ON GROUNDS.

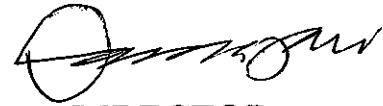
- A. Incorrect & not admitted. on the grounds that the plea of the appellant is illegal as she was been treated as per law & rules by the Department.
- B. Incorrect & not admitted. The act of the Department with regard to the Notifications dated 30-06-2021 & 02-09-2021 is within legal parameter.
- C. 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**  
  
16-05-2023



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**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



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

Phone: 0927-291177  
Address :KDA Karak  
Email:deof\_omalekarak@yahoo.com

To: 27

Dated Tank the: - 21 / 11 / 2020

To:

**The Director E&SE Department  
Khyber Pakhtunkhwa, Peshawar.**

Subject:

**ENQUIRY REPORT**

Ref:

Reference to your letter No. 1069-51/A-12/Complaint/Vol-15 A dated Peshawar on 12-10-2020. Enclosed find here with Enquiry report consists of (04) pages along with supporting documents (07 copies) for further necessary process as desired please.

Enclos: (As above).

**Shazia Nawaz  
DDEO (F) Karak / Enquiry Officer.**

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**ENQUIRY REPORT**

**TITLE OF ENQUIRY:**

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

**ENQUIRY OFFICER:**

Mst. Shazla 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: Shahna 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 Haya



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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.

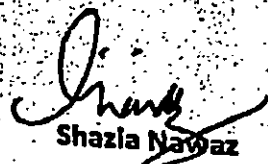
2. RS. 80000/- has been misused by Mst Shahana Hameed ASDEO establishment O/O DEO (Female) Bannu she has also been misused her authority and violated the financial procedure.

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.



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OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE) BANNU.

NO. 3679-B1

Dated Bannu the 30/06/2021

TO,

- 1- Principal, GGHSS 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.

*26/7/21*

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

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**NOTIFICATION**

1. WHEREAS, A complaint was received from Mr. Hayat Khan S/O Khazanat Khan, resident of Hayat Muhammad Khel, District Bannu, lodged against Mst, Gul Shireen SST Ex HM GGCMS Hayat Muhammad Khel 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 Mst, Gul Shireen SST Ex-HM GGCMS Hayat Muhammad Khel Bannu vide this office Notification No.9090-92 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 teacher, 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 penalties of CENSURE and recovery of whole amount illegal drawn and utilized by the Mst, Gul Shireen SST Ex-HM GGCMS Hayat Muhammad Khel Bannu i.e., 390000 under Rule 4 (a) (i) and (iii) of the Ibid Rules.

**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No. 2108-13 /A-17/Complaint/General Cases/2019. Dated: 21/9/2020  
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.

*for Shahzia Nawaz 21/9/2020*  
Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar  
*21/9/2020*



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

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**AUTHORITY LETTER**

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammed Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 7755/2021 Titled Gul Shireen VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 9/10/2023

  
**Director**  
**Elementary & Secondary Education**  
**Khyber Pakhtunkhwa Peshawar.**