

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

SERVICE APPEAL NO 4897 12021

Muhammad Javed.....Appellant

Versus

Secretary E&SE Department Peshawar and
others.....Respondents

SERVICE APPEAL

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Dated 22/04/2024

Uy
District Education Officer
(Female) Mansehra/
Respondent No. *4-3*

24-04-24
A. A. Baef
S. B

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

SERVICE APPEAL - 4897/2021

Muhammad Javed.....Appellant

Versus

Secretary E&SE Department Peshawar and
others.....Respondents

**Khyber Pakhtunkhwa
Service Tribunal**
Diary No. 12320
Dated 22/4/24

SERVICE APPEAL

**PARA-WISE COMMENTS ON BEHALF OF
RESPONDENT NO. 3**

PRELIMINARY OBJECTION

- 1) That, appellant has got no cause of action.
- 2) That, appellant has not come to this Honourable Tribunal with clean hands.
- 3) That, departmental inquiry was conducted and the charges proved against the appellant.
- 4) That, the appeal is not maintainable.
- 5) That, appellant has concealed the material facts from this Honourable Tribunal.

ON FACTS

- 1) That, para No. 1 needs no comments.
- 2) That, para No. 2 is correct.
- 3) That, para No. 3 is correct.
- 4) That, para No. 4 is correct.
- 5) That, para No. 5 is incorrect. Infact the appellant has applied for the appointment of Naib Qasid/Class-IV on disabled quota, later on the said certificate was sent to concerned quarter for its verification. After verification the said certificate was found bogus, on receipt of the verification the appellant was charge sheeted.

(Copies of appointment letter and verification are annexed as Annexure "A" & "B")

- 6) That, para No. 6 is incorrect. The appellant was removed from service after conducting departmental inquiry and proving the charges the appellant was removed from service.

(Copies of inquiry report, show cause notice, reply and final order are annexed as Annexure "C", "D", "E" & "F")

- 7) That, para No. 7 is correct to the extent of filing of departmental appeal and the appellant was time and again called for personal hearing vide letter No. 7537-39 dated 19.10.2020. Hence, para is denied.

(Copy of letter is annexed as Annexure "G")

- 8) That, appellant has got no cause of action to file instant appeal.

ON GROUNDS: -


- A) That, para "A" is incorrect. As replied above.
- B) That, para "B" is incorrect. Proper departmental inquiry was conducted and full opportunity for personal hearing was granted to appellant to appear before the Inquiry Officer and after hearing the appellant, the Inquiry Officer has made his finding and the reply of the appellant was unsatisfactory. Hence, the impugned order was issued in accordance with law after fulfilling all the codal formalities. Hence, para is denied.
- C) That, para "C" is incorrect. A proper inquiry was conducted and the appellant was found guilty.
- D) That, para "D" is incorrect. The appellant was given opportunity to submit his written reply as well as personal hearing. After adopting all the legal and codal formalities the appellant was found guilty and punished in accordance with law.
- E) That, para "E" is incorrect. Regular inquiry was conducted and after proving of the allegation the appellant was punished according to law.
- F) That, para "F" is incorrect. Proper statement of allegation was prepared and handed over to appellant.

- G)** That, para "G" is incorrect. Proper lawful procedure was adopted. The impugned order is correct and according to prevailing law and rules.
- H)** That, para "H" is incorrect. The answering respondent has no bias against the appellant and hundred of employees are serving in Education Department and being the head of the department the answering respondent has no personal grudge with any one. The allegations leveled by the appellant. Hence, para is denied.
- I)** That, para "I" is incorrect. The proper inquiry was conducted and the charges leveled against the appellant were proved after fulfilling all the required/ codal formalities. Hence, the para is denied.
- J)** That, para "J" is correct to the extent that he has performed his duties and during the duty period the appellant was benefited according to law and after receiving of the report that he has produced a bogus certificate and get his appointment on the said certificate, he was removed from service and the department has also save the rights to register the criminal case against the appellant which will be initiated after getting permission from the high-ups.
- K)** That, para "K" is incorrect. As replied above.
- L)** That, para "L" is incorrect. As replied above.
- M)** That, para "M" is incorrect. The appellant has got bogus disable certificate and on the basis of that certificate the appellant was appointed and when it was proved the action was taken against the appellant and he is liable to be proceeded against through criminal proceedings. The appellant has not applied for the appointment of class-IV on open merit, but he has applied against the disable person quota, so on the basis of bogus certificate he was appointed against disable quota.
- N)** That, para "N" is incorrect. As replied above para.

- O) That, Para "O" is incorrect. As replied
above Para.
- P) That, Para "P" is incorrect. As replied
above Para.
- Q) That, Para "Q" is incorrect. As replied
above Para.
- R) That, Para "R" is incorrect. As replied
above Para.
- S) The respondent seeks leave to raise
additional grounds at the time of
arguments.

It is, therefore, most humbly prayed and
requested that the appeal may kindly be
dismissed with cost.

Dated _____/01/2024


Rehana Yasmeen
District Education Officer
Respondent No 1-3

BEFORE THE HON'BLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

IN S.A#- 4897/2021.

Mr. Muhammad Javed

VS

Govt: of KPK through Secretary E&SE department & others.

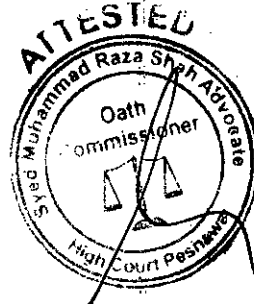
AFFIDAVIT

I Mst: Rehana Yasmeen do hereby solemnly affirm and declare on oath that all the contents of the instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court. It is further stated on oath that in this appeal the answering respondents have neither been place ex-parte, nor their defense has been struck off.

Deponent: 

CNIC: - 13302-1493277-0

22 APR 2024



BEFORE THE HON'BLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

IN S.A#- 4897/2021.

Mr. Muhammad Javed

VS

Govt: of KPK through Secretary E&SE department & others.

REPLY TO THE TITLED APPLICATION ON BEHALF OF RESPONDENT NO 01-03

AUTHORITY LETTER

Mr. Muhammad Usman legal representative District Education Officer
(Female) Mansehra do hereby submit reply in the subject titled application on
behalf of respondent No 01-03


**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

(Respondent No 01-03)

VINEYARD DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

APPOINTMENT ORDER

As approved by the Departmental Selection Committee, the competent authority has been pleased to appoint the following candidates on regular Basis under Employees' quota against vacant posts mentioned against each in BPS-3 @ Rs. 6535-260-14335 pm plus special allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions

S No	NAME WITH FATHER'S NAME	APPOINTED AS	NAME OF SCHOOL WHERE APPOINTED	REMARKS
1	Malik Israr Ali S/o Mir Afzal	Chowkidar	GGHSS No2 Mansehra	A/ Vacant post Emp:son)
2	Muhammad Nawaz S/o Muhammad Suliman	Chowkidar	GGHSS Taringri Bala	A/ Vacant post Emp:son)
3	Muhammad Israr S/o Muhammad Saraj	Naib Qasid	GGHSS Gari Habibullah	A/ Vacant post Emp:son)
4	Muhammad Shamrooz S/o Muhammad Maskeen	Chowkidar	GGPS Bherkund No 1	A/ Vacant post Emp:son)
5	Muhammad Zahid S/o Ayyat Ali	Chowkidar	GGPS Kalas Pairan	A/ Vacant post Emp:son)
6	Ishfaq Ahmad S/o Khan Muhammad	Chowkidar	GGPS Dankka	A/ Vacant post Emp:son)
7	Shahid Ali S/o Muhammad Maskeen	Sweeper	GGMS Kotli Paiyan	A/ Vacant post Emp:son)
8	Muhammad Asim S/o Muhammad Yousaf	Chowkidar	GGPS Kalas Jamal Mari	A/ Vacant post Emp:son)
9	Abdur Rehman S/o Abdul Latif	Chowkidar	GGPS Kaghan	A/ Vacant post Emp:son)
10	Sejid Ali S/o Muhammad Haroon	Chowkidar	GGPS Chakia	A/ Vacant post Emp:son)
11	Muhammad Sajid S/o Sain Muhammad	Chowkidar	GGPS Tarri	A/ Vacant post Emp:son)
12	Muhammad Javeed S/o Kala Khan	Naib Qasid	GGHSS Trangri Bala	Dis:able

(Handwritten signature)

Attested

PRINCIPAL
GGHSS Trangri Bala
Mansehra

TERMS & CONDITIONS

1. Their appointment is purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules & regulations as may be prescribed by the Govt. from time to time for the category of the Govt. servants to which they belong.
3. Their services are liable to termination on one month prior notice from either side. In case of resignation without prior notice, one month pay & allowances if any shall be forfeited to Government Treasury.
4. Their services can be terminated at any time in case of their performance found unsatisfactory and they will be proceeded against under the rules (Removal from services (Special Power) Ordinance 2001 & E&D Rules 2011).
5. In case they failed to assume the charge of their posts within 15 days of appointment candidature-ship will stand automatically cancelled.
6. They should produce age & health certificate from the Medical Superintendent DHQ Hospital Mansehra.
7. They may not be handed over the charge if their age is more than 40 years and below 18 years.
8. Charge reports should be submitted to all concerned in duplicate.
9. No TA/DA etc is allowed.
10. The competent authority reserves the right to rectify with draw/cancel/amend the order of the appointee if found any mistake/ illegality/concealment by the candidate at any stage.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst: No 1599-1616 /Estt: (F)/E/Son /2016. Dated Mansehra the 25/11/2016

Copy of above is forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar.
2. District Account Officer Mansehra.
3. Head Mistress GGHSS GGHS GGMS.
4. A S D E O (F) Local Office.
5. Candidates concerned.
6. Office File.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

[Handwritten signatures]

[Handwritten signatures]
Attested
[Signature]

**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**

@ deofmansehra@yahoo.com



Dated: 24/8/2020

The District Officer,
Social Welfare Department Mansehra

Subject: - **VERIFICATION**

Memo:

Enclosed please find herewith disability certificate in respect of the following candidates applied is submitted for early verification.

S#	Name	Father Name	Registration No	Dated
1	Muhammad Javaid	Kala Khan	,000264	23/01/2009

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

Endstt: No. _____

Dated _____/2020.

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar.
2. Office Copy.

24/08
**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

MSO
M. B. I.

Annexure 12

B

W

W



DISTRICT GOVERNMENT MANSEHRA
OFFICE OF DISTRICT OFFICER SOCIAL WELFARE DEPARTMENT

No. 30/Disabled/DO (SW) M- 2021
Dated Mansehra the 22/9/2020

The District Education Officer
(Female), Mansehra

Subject: VERIFICATION

Kindly refer to your letter No. 6465 dated 24-8-2020 on the subject cited above.

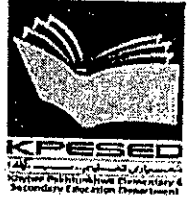
It is stated that the certificate in respect of Muhammad Javed S/O Kala Khan bearing No. 000264 dated 23-1-2009 is incorrect and fake and this office has not issued this certificate. As per office record the said person has not been assessed by District Assessment Board and not registered under the above quoted registration Number and date. Report is submitted please.

DISTRICT OFFICER
Social Welfare, Spl: Edu. & Women Emp. Deptt.
Mansehra

**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**



deofmansehra@yahoo.com



Dated: _____/2020

NOTIFICATION

In response of letter received from Principal GGHSS Trangri Bala vide No. 288 Dated: 11/08/2020, The following officers are hereby nominated as enquiry committee to probe into the matter and submit detail inquiry report along with clear finding/recommendation with (15 days) to this office against Mr. Muhammad Javaid Class Naib Qasid who was appointed as per office /school record under disable quota at GGHSS Trangri Bala, but her disability certificate is doubtful.

- | | |
|---|-------------|
| 1. Nazish Naheed Principal GGHSS Murad Pur | Chairperson |
| 2. Javaria Kanwal V/Principal GGHSS GHUllah | Member |

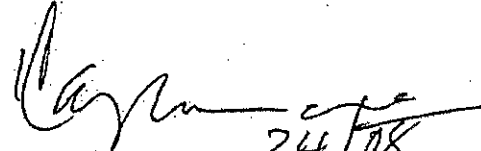
**DISTRICT EDUCATION OFFICER,
(FEMALE)MANSEHRA**

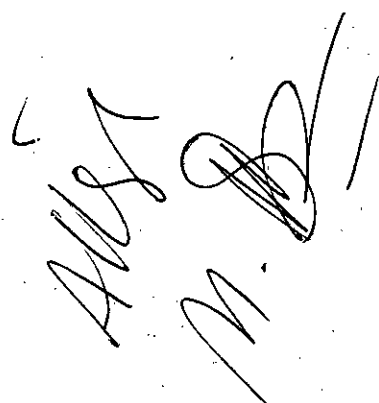
Endstt: No. 6460-63 /

Dated 24/08 /2020

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar.
2. Principal GGHSS Trangri Bala.
3. Inquiry committee concerned
4. Office copy.


24/08
**DISTRICT EDUCATION OFFICER,
(FEMALE)MANSEHRA**



OFFICE OF THE PRINCIPAL G.G.H.S.S MURADPUR, MANSEHRA

Ednst. No: 232

Dated: 12/09/2020

To:

The D.E.O (F) E&SE Mansehra

SUBJECT: "Inquiry Report Of 'Mr. Muhammad Javed N/ Qasid'" GGHSS Trangri Bala
Madam,**CAPTION OF INQUIRY:** Reference to your letter Endst No: 6460-63 dated 24/08/2020.
The inquiry was conducted on 16/09/2020 at GGHSS Trangri Bala.**Inquiry Committee:**

1. Nazish Naheed (Principal) - Chairperson - (G.G.H.S.S Muradpur)
2. Javeria Kanwal (V/ Prinicipal) - Member - (G.G.H.S.S Gharj Habibullah)

TOR'S:

Illegal appointment of Muhammad Javed N/Q on disable quota in GGHSS Trangri Bala.

PROCEDURE:

1. As per my letter issued to DEO (F) Mansehra for provision of relevant record related to this case received the required record on 15/09/2020.
2. I along with other member has visited the GGHSS Trangri Bala on 16/09/2020. After the discussion with concerned, served the questionnaire and also collected the verbal replies.
3. Visited the District Social Welfare office Mansehra for the purpose of verification of his disability certificate provided by DEO (F) Office.

FINDINGS:

On Inquiring the matter in detail from all the concerned persons, we discovered the following facts:

1. Muhammad Javed s/o Kala Khan, resident of village Chanial (parhinna), has been appointed as a N/Q in GGHSS Trangri Bala on 29/01/2016.
2. He was appointed on disable quota but he is not disabled at all and still working as N/Q in GGHSS Trangri Bala.

Handwritten signatures of the Principal and a member of the inquiry committee.

- 13
- On inquiring the matter from Muhammed Javed personally, he admitted that he is not disabled and he is unaware of the fact that he was appointed on disable quota (Although it is clearly mentioned in his order that he is disable and he could easily read it being a matriculate). [Attached]
4. In his application for appointment provided by DEO (F) office his disability shows his leg, whereas the disability certificate show his disability about his arm. Moreover no diary no. is mention in his application. His signature is also looking doubtful.
5. As per statement of Mr. Muhammad Javed that he has submitted his application for appointment to DEO (F) Office under open quota instead of disable quota.
6. He refused to accept the reality of disability certificate present in his record provided by DEO(F) office Mansehra. Moreover, no record of disability certificate is present in his concerned school.
7. In school record he has provided medical fitness certificate dated 04/02/2016 [attached]
8. As per working paper prepared by office staffs/ checked by DSC committee & available disability certificate (fake) issued by District Welfare Officer Mansehra his date of birth mentioned 03/03/1986, whereas in his CNIC & certificate of SSC, it is 03/03/1981.
9. Mr. Muhammad Javed (N/Q) has took over the charge in the school on 01/02/2016 and that time Mst: Nuzhat Bibi was working as principal whereas Mr. Zaheer ul Islam was Junior Clerk.
10. Mst: Nuzhat Bibi (Principal) has expired, whereas Mr. Zaheer ul ~~Haq~~ is presently working at GGHS Bajna.
11. On my question Mr. Zaheer ul ~~Haq~~ has stated that DEO (F) Mansehra has not directed to principal in the appointment order that pay will be release after verification, nor any instruction issued by principal to me for his verification. However the committee has found to guilty the principal as well as Junior Clerk, because it is clearly mention in his appointment order that he is appointed as disabled.
12. It is clear that DSC also show negligence, carelessness about checking his documents provided by Mr. Muhammad Javed at the time of appointment. Moreover nor any instruction mention in his appointment order about his pay activation or verification; however a letter provided by DEO (F) Office vide No 1728 dated 02/02/2016 after issuing the appointment order to the name of Principal for verification /pay of his documents, but no record found in the school.
- AWJ
- M

14

13. No scrutiny committee constituted before the DSC

14. District Social Welfare Officer Mansehra has declared his disability certificate as fake [copy attached]

RECOMMENDATIONS

In the light of above mentioned facts, it is strongly recommended that:-

1. It is strongly recommended that Muhammad Javed N/Qasid being accused of fraud, deceiving and in hiding the facts he should be removed from his service under E & D Rules 2011.
2. The DSC committee show negligence, carelessness during the checking of the documents should be treated as per rules.

Submitted By:

Nazish Naheed (Principal) - G.G.H.S.S Muradpur

Javeria Kanwal (V/Principal) - G.G.H.S.S Ghari Habibullah

Handwritten signature: Nazish Naheed

Stamp: PRINCIPAL BPS-18
MURADPUR, MANSEHRA

Dated: 21/09/2019

Handwritten signature: Javeria Kanwal

Handwritten signature: Nazish Naheed

DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA

@ deofmansehra@yahoo.com



DB



Dated: 02/10/2020

SHOW CAUSE NOTICE

Mst. Naghmana Sardar District Education Officer (Female) Mansehra in capacity of competent authority under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Disciplinary) Rules, 2011 do hereby serve this show cause notice upon you, Mr. Muhammad Javaid N/Q GGHSS Trangri Bala that:-

1. WHEREAS you were appointed against the post of Naib Qasid at GGHSS Trangri Bala under disable quota vide order No. 1599-1616 Dated 29/01/2016 at Sr.No. 12, but actually you are not disable.
2. WHEREAS an inquiry committee was constituted vide this office Endstt. No. 6460-63 Dated 24/08/2020 for clear cut recommendation.
3. WHEREAS After verification of your disability certificate, the inquiry committee reported that your disability certificate is found fake as confirmed through letter issued by District Social Welfare Department Mansehra vide No. 30/Disabled/DO (SW) M 2021 Dated Mansehra the 22/09/2020, and you are involved in fraud, deceiving and hiding the facts.

I am satisfied that the allegations imposed against you are genuine, as a result thereof I as competent authority have tentatively decided to impose upon you the major penalty i.e. "REMOVAL FROM SERVICE".

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

If no reply to this notice is received within (15) days of its issuance, it will be presumed that you have no defense to put in and in that case ex-parte action will be taken against you.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Dated Mansehra the 02/10/2020

Endstt. No. 7163-65 / ADEO(E-I) Personal File

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Principal Govt. Girls Higher Secondary School Trangri Bala with the direction to inform the concerned Naib Qasid for written reply with in the period.
3. Mr. Muhammad Javaid Naib Qasid GGHSS Trangri Bala.
4. Office Copy.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

OFFICE OF THE ORINCIPAL GGHSS TRANGRI BALA MANSEHRA

NO. 306 DATE 16/10/2020

TO

District Education office,
Female (Mansehra)

Subject :- Replay of Show Cause notice in respect of Muhammad Javed Naib Qasid

Memo,

With reference your letter no. 7163-65 dated 2/10/2020, the replay of show cause notice in respect of Muhammad Javed Naib Qasid GGHSS TRANGRI BALA is enclosed herewith for further necessary action please.

[Handwritten signature]

[Handwritten signature]
16/10/2020
PRINCIPAL
GGHSS TRANGRI BALA
MANSEHRA
GGHSS Trangri Bala
Mansehra

Amyid sb

[Handwritten signature]
20/10/20
DEO(F)



SHOW CAUSE NOTICE

Reference with regard to the reply of showcase notice vide Endst. No. 7163-65 dated 02-10-2020, inspect of Muhammad Javed Naib Qasid GGHSS, Tangri Bala District Manshara as follows:-

1. That the applicant/respondent is law abiding person and poor segment of locality and not violate any law with regard to his appointment order and to the honest and punctual with regard to the services.
2. That applicant/respondent applied for the post of Naib Qasid/Class-IV in the department which was duly in course, after recommendation of Departmental Selection Committee was appointed as Naib Qasid vide appointed dated 29-01-2016.
3. That applicant/respondent applied for the post of Naib Qasid in District Manshara which was duly appointed by the competent authority and the applicant had never filed an application along with non employment certificate for the post of Disable Quota on the basis of a certificate of disability from the District Social Welfare Department Manshara and allegation leveled against the applicant is baseless malafide, alter motive.
4. That the alleged appointment order was issued vide dated 29-01-2016 for the candidate who belongs to Employee's Son's Quota the officials of department has malafidely incorporated the name of applicant in appointment order of employee's sons Quota and the column of remarks against the name of applicant shows that "Disable" which is highly probable and negligence of the official of the department.
5. That the applicant/respondent never been applied for the post of Class-IV under Disable Quota all the practice was made by official of the department, their negligence would not be punished to the applicant.
6. That the applicant is poor segment of society and all the practice with regard to his appointment order was deliberately performed by the official of the department.
7. That the certificate was issued by District Social Welfare Department Manshara has no concerned with the applicant whereas the applicant applied on open merit and all the

with regard to respondent order was made by official of
Education Department.

That the applicant is performing there duties with regard to
their services from the date of his appointment i-e 29.01.2016
up till now and the salary of applicant is regularly drawn by the
concerned authority.

9. That applicant/respondent is filed a Writ Petition before
honorable Peshawar High Court Abbottabad Bench against the
illegal act of officials of the department and against show cause
vide dated 02.10.2020.
10. That the allegation against the applicant is wrong, False and
baseless and no misconduct and in efficiency ever
perform/showed by me and no fraud had been committed by
the applicant, for getting his appointment order, and all the
illegal practice had been performed by the officials of the
department to be concealed their negligence/de-fraud.
11. That it is also incorrect that no legal possibility of proceeding
against applicant as there is no misconduct or any in efficiency
on my part as mentioned in show cause notice because of the in
correct and baseless inquiry against the applicant.
It is therefore most graciously the proceeding with regard to
E&D rules may kindly be set aside and the applicant may
kindly be exonerated from the charge levelled against the
applicant.

You're Sincerely



MR MUHAMMAD JAVED

Naib Qasid, GGHSS Trangri Bala, Mansehra



DISTRICT EDUCATION OFFICER (FEMALE)
MANSEHRA



① deofmanshra@yahoo.com



(92) 0997-300926

No.

Dated: / / 2020

Mr. Muhammad Javid N/O
GGHSS Trangri Bala

Subject: PERSONAL HEARING

Memo:

In response of this office show cause notice issued under Endstt. No. 7163-65 Dated 02/10/2020, your reply received by this office through letter Principal GGHSS Trangri Bala Vide No. 306 Dated 16/10/2020.

You are hereby directed to appear in person along with documents before the undersigned on 22/10/2020 at 10:00 AM.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endstt. No. 7537-39 /

Dated 19/10 / 2020

Copy for information to the -

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. Office copy


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA



DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA



@ deofmansehra@yahoo.com



No. _____

Dated: _____/2020

(I)

FINAL ORDER

1. WHEREAS, Mr. Muhammad Javaid was appointed against the post of Naib Qasid at GGHSS Trangri Bala under disable quota vide order No. 1599-1616 Dated 16/01/2016.
2. AND WHEREAS, as a complaint was received from the Head of Govt. Girls Higher Secondary School Trangri Bala on 29/07/2020 where she sought guidance regarding an illegal appointment of Mr. Muhammad Javaid Naib Qasid.
3. AND WHEREAS, This office constituted the committee for detailed inquiry vide No. 6460-63 Dated 24/08/2020 & received the detail report along with verification letter issued by District Social Welfare Officer Mansehra on 12/09/2020.
4. AND WHEREAS, This office issued show cause notice to Mr. Muhammad Javaid N/Q GGHSS Trangri Bala vide Endstt. No. 7163-65 Dated 02/10/2019 & received reply on 16/10/2020.
5. AND WHEREAS, Called the personal hearing vide No. 7537-39 Dated 19/10/2020 which he attended the office on 22/10/2020.

NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I. Naghmana Sardar DEO (Female) Mansehra being the competent authority is satisfied with the record on file, report of inquiry officer and verification letter issued by District Officer Social Welfare Mansehra vide No. 2021 Dated 22/09/2020; in which disability certificate declared as fake to impose major penalty of "REMOVAL FROM SERVICE" upon Mr. Muhammad Javaid N/Q.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA
Dated Mansehra the 08-11-2020

Endstt: No. 7806-10 /ADEO(E-I) Personal File
Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer Mansehra.
3. District Account Officer Mansehra.
4. Principal GGHSS Trangri Bala.
5. Mr. Muhammad Javaid.
6. Office Copy.

[Handwritten signatures]

[Handwritten signature]
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA