

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No: 704/2024

Mst: NOREEN HAMAYUNAppellant

VERSES

Govt:of KPK and others.....RESPONDENTS

SERVICE APPEAL

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M. B.
Deponent.

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

APPEAL No. 704/2024

Khyber Pakhtunkhwa
Service Tribunal

17821

08-11-24

Noreen Humayun 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 (Female) Mansehra
4. District Education Officer (Female) Battagram..... Respondents

Para wise Comment on behalf of the Respondent No. 1 to 3.

PRELIMINARY OBJECTION.

1. That the Appellant is not the "AGGRIEVED" person.
2. That the Appellant is estopped by his own conduct.
3. That the Appellant has not come to the honorable Tribunal with clean hand.
4. That the Appellant has no cause of action/locus standi to file the instant appeal.
5. That instant Appeal is against the prevailing law and rules.
6. That the appellant has concealed the material facts from this Honorable Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed without any further processing.
7. That the appeal is groundless and based on malafide, ulterior motive, hence the same is liable to be dismissed.
8. The instant appeal is not maintainable in the present form and also in the present circumstances of the issue.
9. That the demand of the appellant is against the law and facts hence the appellant is not entitled for any relief and appeal is liable to be dismissed on this score alone.

10. That the Appellant has not come to the court with clean hand, because the appointment of the appellant is fake, on the basis of fake appointment order and thereafter fake and fabricated inter district transfer order from District Battagram to District Mansehra of the appellant, hence the same is not maintainable in eye of law, is liable to be dismissed.

11. That the appeal is barred by law and limitation.

FACTS

RESPECTFULLY SHEWETH

1. Para related to documentary evidence, hence no comments.
2. Is in correct, the appointment order of the applicant is fake/fabricated and she indiged herself & to the Govt service fridiently in such illegal appointment, the respondent No. 3 sent a letter for verification of appointment order of applicant to District Education Officer (Female) Battagram (appointed authority) vide No. 5515-21/EB/AE-II/Appointment/2010 Dated 28/01/2011, where upon the District Education Officer (Female) Battagram (appointed authority) on reply of the said letter vide No. 276 dated 01/12/2024 , where as the Head Mistress along with District Education Officer (Female) Battagram stated that as per school record Noreen Humayun has not remain in GGHS Banian District Battagram. It is clear that the appointment orders as well as other related documents are fake and fabricated (Annexure "A", "B" and "C")
3. Is in correct on the basis of the fake appointment order and their after fake inter district transfer order vide No. 251-56 Dated 2/1/2013 taking of charge on the post of CT is illegal and mis conceived to the department. (~~Annexure "D" and "E"~~)
4. Para No. 04 is correct to extend that the transfer order has made in 2014.
5. Para No. 05 is incorrect
6. Para No. 06 is correct to extent that the applicant was promoted from CT BPS-15 to SCT BPS-16 vide No. 5847-90 Dated 21/03/2019
7. Para No. 07 is incorrect to extend that the Honorable Supreme Court of Pakistan was initiated an inquiry in CP 470/165/166 of 2021 against the District Account Officer Battagram.

8. Para No. 08 the detail-reply is given at Para No. 01 & 02

9. Reply is also given in Para 01 & 02

10. Para No. 10 is incorrect

11. Para No. 11 is incorrect

GROUND

1. The answering respondent has not been violated any fundamental rights of the applicant which are printed by the constitution.
2. It is correct the department is bound to obey the rules and regulations prevail by the government of Khyber Pakhtunkhwa.
3. Is in correct.
4. Is in correct, the appointment order was made by the appointed authority is illegal hence the applicant has no right to such type of illegal appointment.
5. Is in correct.
6. Is in correct, the orders vide Dated 05/01/2024 & 06/01/2024 issued by the respondents is based on fact and declared illegal.
7. Is in correct.
8. Is in correct, the Para pertain to same records of the applicant, hence no comments.
9. Is in correct, the applicant was promoted from CT to SCT on the basis of seniority cum fitness, hence the department has not committed any illegality against the applicant.
10. No comments.

11. Is in correct. The answering department provides all legal and codal formalities to initiate the proceeding against the applicant.

12. Is in correct.

13. Any other grounds agitated by the respondents at the time of arguments.

PRAYED

It is therefore humbly prayed that on acceptance of above submissions, the instant appeal may very graciously be dismissed in the favor of answering Respondent in the interest of the justice.


MR. FIAZ ALAM

Additional Secretary(Estab)E&SED

On behalf of

(Masood Ahmed)

Secretary

E&SED

(Respondent No.1)


ABDUS SAMMAD

Deputy Director(Legal)Director of
Elementary & Secondary Education

Peshawar

On behalf of

(SAMINA ALTAF)

Director

E&SED

(Respondent No.2)


NAGHMANA SARDAR

District Education Officer(Female)

Mansehra

(Respondent No.3)

BEFORE THE HONORABLE SERVICE TRIBUNAL KPK
PESHAWAR

Mst: Noreen HamayunAppellant

Verses

Govt of Khyber Pakhtunkhwa through
Secretary E&SE etc..... Respondents

APPEAL NO. 704/2024

PARA-WISE COMMENTS ON BEHALF
OF RESPONDENTS

AFFIDAVIT

I, NAGHMANA SARDAR, DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA DO HEREBY AFFIRM AND DECLARE THAT THE CONTENT OF FORE-GOING COMMENTS OF APPEAL NO NO - 704 OF 2024 ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALE OR SUPPRESSED FROM THIS HONOURABLE COURT.

Affidavit should be signed by the person from the Respondent only who is party in subject case / appeal. Following statement is further stated on oath that the answering Respondent have not been placed on party party nor their defense has been struck off, also no cases referred.

DATED _____



Naghmana
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

08 NOV 2024

BEFORE THE HONORABLE SERVICE TRIBUNAL
KPK ESHAWAR

Mst: Noreen HamayunAppellant

Verses

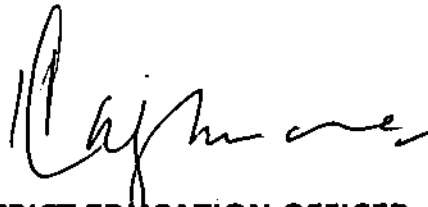
Govt of Khyber Pakhtunkhwa through
Secretary E&SE etc..... Respondents

APPEAL NO. 704/2024

PARA-WISE COMMENTS ON BEHALF
OF RESPONDENTS

AUTHORITY LETTER

Mr. Muhammad Usman Legal representative of 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 to 03)

A
b

Amir Ali
162

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) BATTAGRAM.

APPOINTMENT.

Consequent upon the recommendation of the departmental Selection Committee and the approval of the competent authority, the appointment of the following CT(F) candidates are hereby ordered at the ratio of 25% open merit BPS-09 @ Rs.3820-230-10720) plus usual allowances as admissible Under the rules in the interest of public service w.e.f the date of their taking over Charge on the terms and conditions given below:-

S.No	Name of Candidates	Name of School where posted	Weight	Remarks
1.	Nargus Bibi	GGMS M/Bai Khail	65.45	A.V.Post
2.	Nouren Hamayoun	GGHS Banian	64.44	-do-
3.	Bakht Bibi	GGMS Chohan	56.45	-do-
4.	Nazma Bibi	GGMS Chohan	54.63	-do-
5.	Nadia Farid	GGMS Pora	54.20	-do-

TERMS AND CONDATIONS.

1.	Charge report should be submitted to all concerned.
2.	The appointees will get initial allowances as admissible to them under the rules
3.	They will entitle for annual increments as per relevant Govt. policy however they Will not be eligible for pension and gratuity as per current policy of Govt. of KP
4.	The appointees will produce Age & health certificate from the DHQ Hospital Battagram.
5.	Their service will be considered dealt as per rules and regulation of Govt. of KP
6.	The appointees are bound to take over charge in their respective schools within 15 days after issuance of this order.
7.	Those appointees whose documents proved bogus/fake they will be terminated From their service without serving any notice. They have no right to make approach to the department as well as court. Undertaking will also be recorded in their service books besides they will get no salary till the completion of verification.

(Muhammad Saeed)
Executive District Officer (E&SE)
Battagram

Handwritten signature and initials

Amended
7

7

Endst: No SS/5-21/EB/AE-II/Appointment/2010 dt: 28/11/2011
Copy forwarded for information and necessary action to the:

- 1-District Coordination Officer Battagram
- 2-District Accounts Officer Battagram
- 3-Deputy District Officer(F) Elementary Education Battagram.
- 4-IC Headmistress Concerned.
- 5- Assistant District Officer(B&A) Local Office.
- 6-In Charge pay section (F) Local Office.
- 7-Candidates concerned.

R. Ahmad
District Officer(M/F)
Elementary & Secondary Education
Battagram
28/11/11

AB
M. Q.

Amma (A-)
8

8

**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**



@ deofmanshra@yahoo.com



No. _____

Dated: _____ /2023

To

The District Education Officer
(Female) Battagram

SUBJECT:-

**DE-NOVO INQUIRY IN LIGHT OF HONOURABLE SUPREME COURT
ORDERS IN CP NO. 470 AND 165-166-P OF 2021 TO PROBE INTO THE
ILLEGAL/FAKE APPOINTMENTS IN DEO OFFICE BATTAGRAM.**

Memo:

Reference letter received from Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide No. SO (Inquires) E&SED/1-1/2023/Ghost Employees/ Battagram Dated Peshawar the 26/12/2023, regarding employees who have been declared invalid/fake by the District Education Officer (Female) Battagram, in which one Mst: Noreen Humayun who was appointed at GGHS Banian District Battagram and transfer to this District. Is included in the list.

You are therefore requested to please provide the latest status of the said teacher as this office has not received any correspondence about the said teacher, so that further action will be taken against the teacher.

SL

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

Endstt: No. 10788-89 / P. File No. _____ Dated 03/01/2024

Copy for information to the:-

1. Section Officer (Inquires) office of the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
2. Office Copy

[Handwritten signature]

3/1/23

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

Amman (A) 9



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

(Phone # 0997-310460) (E-mail: demisfbattagram@yahoo.com)

NO 276

Dated. 01/02/2024

To:
The District Education Officer (F),
Mansehra.

Subject:- DE-NOVE INQUIRY IN LIGHT OF HONOURABLE SUPREME COURT
ORDERS IN CP NO.470 AND 165-166-P OF 2021 TO PROBE INTO THE
ILLEGAL/FAKE APPOINTMENTS IN DEO OFFICE BATTAGRAM

Memo;
Reference to your office letter No. 10787 dated 03/01/2024 regarding De-Novo inquiry in light of honorable Supreme Court orders in CP No.470 and 165-166-p of 2021 to probe into the illegal/fake appointments in DEO office Battagram.

On the subject cited above and to state that according to the statement of Principal GGHSS Banian no Noreen Hamayun has been at the strength of said school.

[Signature]
District Education Officer (F)
Battagram

Endst No and Date: As above

Copy for information to the:-

1. Section officer (Inquiries) office of the Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Office file

[Large handwritten signature]

[Signature]
District Education Officer (F)
Battagram

Ameer CA

10

File of The Principal GHS Banian Battagram

No 166.

Dtd 31-01-2024

District Education
Offices (F) Battagram

Subject. DE-NOVE INQUIRY IN LIGHT OF HONORABLE SUPREME COURT ORDERS IN CP NO 470 AND 165-166 P OF 2017 TO PROBE INTO THE ILLEGAL/FAKE APPOINTMENT IN DEO OFFICE BATTAGRAM

MEMO,

Reference of your office letter NO 151 dtd 01/01/2024 subject cited above and to state that AS PER School record ~~of~~ MIS Noreen Hamayoon has not remained an employees of GHS Banian DIST, Battagram

Therefore in this regard will report submitted to your office for information and necessary action please

Principal
GHS Banian
Battagram

[Handwritten signature]

Annexure "B"

11/

F/J



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

o.2617 / F.NO:167 vol:5/transfer

Dated: 05 / 01 / 2024

To:

The Section Officer,
Inquiries, E&SED Deptt,
Khyber Pakhtunkhwa Peshawar.

Subject: - DE-NOVO INQUIRY IN THE LIGHT OF HON.ABLE SUPREME COURT ORDERS IN CP 470 AND 165-166-I OF 2021 TO PROBE INTO THE ILLEGAL FAKE APPOINTMENT IN DEO OFFICE BATTAGRAM

Memo:

I am directed to refer to your letter No. SO (Inquiries) E&SED/1-12023/Ghost Employees/Battagram dated 28th December 2023 on the subject noted above and to state that transfer order in respect of Nareen Hanayoun CT GOMS Banaln Battagram to GOMS Nika Pani Manshera under endst:NO:251-56 Dated 2-1-2013 is hereby declared fake and bogus and not found in the office record.

Deputy Director (Estab: Female)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl: Nil

Copy forwarded for information and necessary action to the:-
1- PA Director Elementary & Secondary Education Khyber Pakhtunkhwa

Deputy Director (Estab: Female)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

[Handwritten signatures]

Annex B

12

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR.

OFFICE ORDER:-

Consequent upon ban relaxation and approval by the competent authority Mst. Noreen Hamayun CT GGHS Banian Battagram is hereby transferred/ adjusted against the vacant post of CT at GGHS Nika Pani Manselam Dist: on her own pay & BPS in the interest of public service with immediate effect.

- Note: -
1. Charge report should be submitted to all concerned.
 2. No TA/DA etc are allowed.
 3. The EDO concerned is directed to check her original service documents before making payment of salary.
 4. Her Seniority will be determined as per rules/policy.

DIRECTOR
ELEMENTARY & SECY; EDUCATION
KHYBER PAKHTUNKHWA

251-56
Encls: No. _____ F.NO. 1670/5 Transfer (5) July 2012 Dated Pesh: the 21/1/2013

Copy of the above is to the:-

1. Executive District Officer (E&SE) Battagram & Mansehra.
2. District Accounts Officers Battagram & Mansehra.
3. Principal/Head Mistress concerned.
4. Teacher concerned.
5. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
6. M/File.

[Handwritten signatures and initials]

[Handwritten signature]
Deputy Directress (Estab)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
M.K

Amir (B)
13

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA
NOTIFICATION

In pursuance to the Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endstt: No. 3927-32/A-17/SST (F)/Promotion cases/2019 Dated Peshawar the 18/02/2019, the following CTs are promoted to the post of SCT DPS 16 @ Rs: (18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government on the terms and conditions given below are hereby adjusted against the stations noted against name with immediate effect.

Sl#	Name of SCT	Name of School	Name of school where adjusted	Remarks
1	Sadia Iknlaq	GGHS Khaki	GGHS Khaki	Against V/Post on the basis of rationalization
2	Naz Bibi	GGMS Khushala	GGHS Reerh	Against V/Post
3	Aisha Bibi	GGMS Ogra	GGCMS Mansehra	Against V/Post (Vice Bibi Mehmoona died)
4	Sadia Bibi	GGHSS Manshera No 2	GGHSS Manshera No 2	Against V/Post
5	Ashia Sadiq	GGHS Narbeer	GGHSS Gandhian	Against V/Post (on the basis of rationalization)
6	Rukhsanda Jabeen	GGMS Hathi Maira	GGHS Dhodial	Against V/Post
7	Farnana Rasheed	GGMS Hassari	GGHS Hassa	Against V/Post
8	Nahid Sadiq	GGMS Brarkot	GGHS Talhata	Against V/Post
9	Neelum Mushtaq	GGMS Kerka Sydan	GGHS Bherkund	Against V/Post on the basis of rationalization
10	Tehmina Naz	GGHS M.M Pol	GGHSS Shinkiani	Against V/Post
11	Safina Khan	GGHS Bajna	GGHS Bajna	Against V/Post
12	Sajida Rehman	GGMS Karkala	GGHSS Lissan Nawab	Against V/Post
13	Irum Kazim	GGHS M.M Pol	GGHS Dhodial	Against V/Post
14	Lubna Shireen	GGMS Ahi	GGHS Jabori	Against V/Post
15	Farkhanda Jabeen	GGHSS Baffa	GGHSS Baffa	Against V/Post
16	Waheeda Bibi	GGMS Dara	GGHSS Gandhian	Against V/Post on the basis of rationalization
17	Salma Bibi	GGHSS Manshera No 2	GGHSS Manshera No 2	Against V/Post
18	Bibi Ashia	GGMS Danda Kholian	GGHSS Danda Kholian	Against V/Post
19	Naheeda Begum	GGHSS Manshera No 2	GGHSS Mansehra No.2	Against V/Post on the basis of rationalization
20	Ghazala Snaheen	GGHSS Ghandian	GGHSS Ghandian	Against V/Post
21	Farzana Maroof	GGHS Karori	GGHSS Oghi	Against V/Post
22	Zahida Bibi	GGMS Eidgah	GGHSS Trangri Bala	Against V/Post
23	Hussan Taj	GGMS Eidgah	GGHSS Trangri Bala	Against V/Post
24	Bibi Farhat	GGHSS Manshera No 2	GGCMS Mansehra	Vice Bibi Mehrina SCT retired from 31.03.2019
25	Shazia Naheed	GGHS Shehalia	GGHSS Thathi Khurd	Against V/Post
26	Farkhanda Kiran	GGMS Kotli Bala	GGHSS Shinkiani	Against V/Post
27	Rozina Nazli	GGMS Bandi Sadiq	GGHSS Oghi	Against V/Post
28	Kalsoom Akhlor	GGHSS Manshera No 2	GGHSS Manshera No 2	Against V/Post on the basis of rationalization
29	Noreen Humayun	GGCMS Mansehra	GGCMS Mansehra	Against V/Post (Vice Rani Ambreen promoted to SST)

TERMS & CONDITIONS:

1. They would be on probation for a period of one year extendable for another one year.

Annex B

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2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
8. They will be governed by such rules and may be Issued from time to time by the Govt:
9. Before handing over charge once again their documents may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

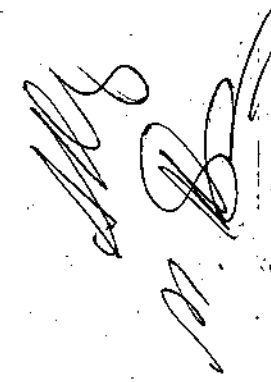
Endst: No. 5847-90 /Estt: Branch/AE-II/Adjustment/Promotion File

Dated 21/03 /2019

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Mansehra.
3. All Principal/Head Mistress Concerned Schools.
4. Teachers Concerned.
5. Office Copy.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA



IMMEDIATE/
SUPREME COURT MATTER



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(HRD Wing)

No. PS(AS HRD)Inq/2023.
Dated, Peshawar the 22/12/2023

To

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary and Secondary Education Department.

SUBJECT: - DE-NOVO INQUIRY IN LIGHT OF THE HON'BLE SUPREME COURT
ORDERS IN C.P NO.470 AND 165-166-P OF 2021 TO PROBE INTO THE
ILLEGAL/FAKE APPOINTMENTS IN DEO OFFICE BATTAGRAM.

Dear Sir,

I am directed to refer to the subject noted above and to state that during proceeding of the Inquiry, it has been found that some employees who have been declared invalid/fake by District Education Officer (Male/Female) Battagram are being shown in Cost Centers of other districts (list attached). Some of them are still drawing their salaries in those districts.

I am, therefore, directed to request that validity and current status of these employees may be verified by the respective district offices and all required documents may be provided by 26th December, 2023 for perusal of the inquiry committee.

Yours faithfully,

(Arshad Ali)

Additional Secretary (HRD)
(Member Inquiry Committee)

Diary Number 1528

Date of Diary 26/12/2023

Secretary Elementary & Secondary
Education, Peshawar

Encl: as above.

Endst: No. & date as above

Copy forwarded to:-

1. Mr. Zubair Ahmad, Special Secretary, Home & TAs Department.
2. Mr. Zaheer-ud-Din Babar, Additional Secretary, Law Department (Member).
3. Mr. Aftab Ahmad, District Comptroller of Accounts, Peshawar (Member).
4. Mr. Bilal Khan, Section Officer (Inquiry) E&SE Department.
5. PS to Secretary Finance Department, Khyber Pakhtunkhwa.

Additional Secretary (HRD)

**MOST IMMEDIATE
SUPREME COURT MATTER
TIME BOUND CASE**



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Phone No.091-9210624 Email: so.inquiries.ense@gmail.com

No. SO(Inquiries)E&SED/1-1/2023/Ghost Employees/Battagram
Dated Peshawar the 26th December, 2023

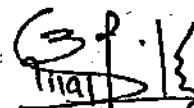
1. The District Education Officers (Male & Female), Peshawar
2. The District Education Officers (Male & Female), Nowshera
3. The District Education Officers (Male & Female), Mansehra
4. The District Education Officer (Male), Kurram
5. The District Education Officer (Female), Haripur
6. The District Education Officer (Female), Charsadda

Subject: **DE-NOVO INQUIRY IN LIGHT OF HON'ABLE SUPREME COURT ORDERS
IN CP NO.470 AND 165-166-P OF 2021 TO PROBE INTO THE ILLEGAL /
FAKE APPOINTMENTS IN DEO OFFICE BATTAGRAM.**

I am directed to refer to the subject noted above and to enclose herewith a copy of Member Inquiry Committee letter No.PS (AS HRD)Inq/2023 dated 22.12.2023 along with a list of employees who have been declared invalid/fake by the District Education Officers (Male & Female), Battagram which are being shown in cost centers of other districts while some of them are still drawing salaries in those districts.

02. In view of the above, you are, therefore, directed that validity and current status of these employees may be verified and all required documents may be provided to this Department by **28th December, 2023** sharp for onward submission to the Inquiry committee.

Note: **Being Supreme Court Matter, the matter may be treated as Most Urgent.**



(Bilal Khan)

Section Officer (Inquiries)

Endst number & date even.

Copy forwarded to the:-

1. Director, E&SE, Peshawar.
2. PS to Secretary, E&SE Department
3. PS to Special Secretary, E&SE Department.
4. PA to Additional Secretary (General), E&SE Department
5. PA to Additional Secretary (HRD)/ Member Inquiry Committee, Establishment Department
6. PA to Dy. Secretary (Admn), E&SE Department



Section Officer (Inquiries)

Ameen ✓

(17)

17/c

S No.	Personal No.	Employee Name	Father Name	BPS	Designation	DDO Code	DDO Desc	DATE OF INITIATION OF 1ST PAY	DISTRICT OF 1ST APPOINTMENT	CURRENT PAY STATUS
1	48646	MALIK HAYAT	MUNIR KHAN	4	NAIB QASID	PW6558	SUB-DIVISIONAL EDUCATION OFFICE TOWN-IV	01.05.2003	PESHAWAR	ACTIVE IN PW6558
2	700365	UZMA BIBI	LIBAS GUL	15	THEOLOGY TEACHER	PW6135	HEAD MISTRESS G.G.H.S.S. BADABAR PESH	01.05.2013	BATTAGRAM	ACTIVE IN PW6135
3	720682	FARAH NAZ	RAMDAD KHAN	15	PHYSICAL EDUCATION TEACHER	NR6248	GGHS Shala Khel Nowshera	01.08.2014	BATTAGRAM	ACTIVE IN NR6248
4	720679	ASIM FAHEEM	SHAH FAHEEM	12	TEACHER	NR6010	GOVERNMENT PRIMARY SCHOOLS (MALE), NOWSHERA	01.08.2014	BATTAGRAM	ACTIVE IN NR6010
5	692143	WASEEM NAZIR	MUHAMMAD NAZIR	15	PHYSICAL EDUCATION TEACHER	MA7166	Govt Middle School (M) Mansehra	01.11.2010	BATTAGRAM	PAY STOPPED IN MA7166
6	718807	RAHIM DAD	MOHIB GUL	15	DRAWING MASTER	MA7166	Govt Middle School (M) Mansehra	01.07.2014	BATTAGRAM	PAY STOPPED IN MA7166
7	709119	YASIR AMEEN	ABDUL AZIZ	15	Theology Teacher	MA5238	Govt Middle School (M) Mansehra	01.12.2013	BATTAGRAM	ACTIVE IN MA5238
8	680627	NOREEN HAMAYUN	HAMAYUN KHAN	16	SENIOR CERTIFIED TEACHER	MA6115	Head Mistress G G H S No1 Mansehra	01.05.2012	BATTAGRAM	ACTIVE IN MA6115
9	709109	FAISAL LATIF	ABDUL LATIF	11	JUNIOR CLERK	KM6033	HEAD MASTER GHS MAKHIZAI KURRAM	01.11.2013	BATTAGRAM	PAID UPTO 31.02.2021 IN KM6033
10	718228	AROOJ TEHSIN	ATTA ULLAH	15	CT	HR6214	HEAD MISTRESS GGHS KANGRA COLONY HARIPUR	01.07.2014	BATTAGRAM	PAID UPTO 31.10.2016 IN HR6214
11	693939	NAZMA ALI	KHURSHEED ALI	15	CT	CA6098	DISTRICT OFFICER SCHOOL AND LITERACY	01.12.2012	BATTAGRAM	Charsadda-UPTO 30.09.2017

Amir (C)
18
18-e

**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**



@ deofmansehra@vnhoo.com



No. 10912
To

Dated: 06/01/2024

Section Officer (Inquiries)
Secretariate of Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar

SUBJECT:- DE-NOVO INQUIRY IN LIGHT OF HONOURABLE SUPREME COURT ORDERS IN CP NO. 470 AND 165-166-P OF 2021 TO PROBE INTO THE ILLEGAL/FAKE APPOINTMENTS IN DEO OFFICE BATTAGRAM

Memo:

Reference your letter vide No. SO (Inquiries) E&SED/1-1/2023/Ghost Employees/Battagram Dated Peshawar the 26/12/2023, This office has submitted the following documents to Section Officer (Inquiries) on 28/12/2023, which was provided by you.

1. Ist: Appointment Order issued from District Battagram.
2. Inter District Transfer Order to Mansehra
3. Relieving Chit from District Battagram.
4. Last Pay Certificate Issued by Head Mistress & countersigned by District Accounts Officer Battagram. Etc

As per letter issued by Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide No. 10787 Dated 03/01/2024, the Inter district transfer order was found fake/bogus, hence the undersigned has not own her service due to fake and bogus appointment and inter district transfer orders. In this regard the undersigned has already sent a letter to District Education Officer (Female) Battagram for latest status and record of her appointment vide No. 10787 Dated 03/01/2024.


**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

Dated 06/01/2024

Endstt: No. 10913-16 / P.File Noreen Humayun

Copy for Inforamtion to the:-

1. District Education Officer (Female) Battagram.
2. Principal GGCMS Mansehra with the direction to stop her salary during the month.
3. Noreen Humayun .
4. Office Copy


**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**