Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
		BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL **Service Appeal No. 160/2018** Date of Institution ..... 16.01.2019 Date of Decision ..... 27.08.2019 Abdul Haye, (SST) Government Higher Secondary School, Shabqadar Fort, Charsadda. **Appellant** **Versus** 1. Government of Khyber Pakhtunkhwa, through Secretary Finance Khyber Pakhtunkhwa Peshawar. 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar. 3. District Education Officer (Male) Charsadda. 4. District Account Officer, Charsadda. **Respondents**
	27.08.2019	**Mr. Muhammad Hamid Mughal----------Member(J)** **Mr. Ahmad Hassan----------Member(E)** JUDGMENT MUHAMMAD HAMID MUGHAL, MEMBER: Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney present. 2. The appellant (SST) has filed the present service appeal for issuance of directions to the respondent to grant Special Compensatory Allowance 2015-16 alongwith arrears, premature increment from December, 2015 and Medical Allowance @ Rs. 1875/- with arrears w.e.f 01.07.2015.

3. Learned counsel for the appellant argued that the appellant is performing his duties as SST; that the respondent No.1 issued Notifications dated 23.02.2017 and 30.06.2015 regarding Special Compensatory Allowance and premature increment; that the appellant opted for Special Compensatory Allowance, however the respondent department failed to grant Special Compensatory Allowance and one (01) premature increment for December, 2015; that Medical Allowance of the appellant was also reduced from Rs. 1875/- to Rs.1500/-. Further argued that the conduct of the respondents of not allowing the above mentioned benefits to the appellant, is illegal and against the norms of justice.

4. As against that learned Deputy District Attorney while referring to the stance of the respondents in their joint written reply, argued that the appellant was drawing his Medical Allowance as Rs. 1050/- on 30.06.2011 on frozen level; that increase in Medical Allowance was allowed @ 25% w.e.f 01.07.2015 on the existing amount of Medical Allowance being admissible on 30.06.2015 hence the appellant was entitled to Medical Allowance @ Rs. 1313/- w.e.f 01.07.2015; that as per Government Orders, Medical Allowance in no case shall be less than 1500/- per month, so, the Medical Allowance was correctly paid @ Rs.1500 per month; that the appellant has wrongly drawn Rs. 1875/- per month as Medical Allowance which was accordingly corrected. Further argued that if fixation of pay gives increase equal to or less than a full increment of the pay scale, the initial in basic pay scale of the higher post shall

8.2018

be fixed after allowing a premature increment however in the case of the appellant, his pay fixation gave him the benefit of more than one (01) increment, thus, the appellant was not entitled to premature increment. Further argued that the actual Special Compensatory Allowance was admissible @ Rs.2679/- per month but the appellant have drawn the same @ Rs. 2853/- per month which has been corrected accordingly.

5. Arguments heard. File perused.

6. From the stance taken by the respondents in their joint reply, documents available on file and the arguments of learned Deputy District Attorney mentioned above, this Tribunal came to the conclusion that the appellant could not make out his case for the grant of further relief.

7. As a sequel to above, the present service appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

(Ahmad Hassan)
Member

(Muhammad Hamid Mughal)
Member

ANNOUNCED
27.08.2019

02.07.2019 Appellant in person present. Mr. Riaz Paindakkhel learned Assistant Advocate General for the respondents present. Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 27.08.2019 before D.B

(Hussain Shah)
Member

(M. Amin Khan Kundi)
Member

27.08.2019 Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney present. Vide separate judgment of today of this Tribunal placed on file, the present service appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

(Ahmad Hassan)
Member

(Muhammad Hamid Mughal)
Member

ANNOUNCED.
27.08.2019

16.1.2019 Appellant in person and Addl. AG alongwith M/S Wisal Muhammad, ADO and Zakiullah, Senior Auditor for the respondents present.

Written reply on behalf of the respondents No. 2 & 5 has been submitted while representative of respondent No. 1 relies on the same.To come up for arguments before D.B on 15.03.2019. The appellant may furnish rejoinder within a fortnight, if so advised.

Chairman

15.03.2019 Junior to counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Zaki Ulah Senior Auditor present. Junior to counsel for the appellant submitted rejoinder which is placed on file and seeks adjournment. Adjourn. To come up for arguments on 07.05.2019 before D.B

Member Member

07.05.2019 Appellant in person and Asstt. AG alongwith Nisar Khan, AAO and Zakiullah, Senior Auditor for the respondents present.

Appellant requests for adjournment due to indisposition of his learned counsel. Adjourned to 02.07.2019 for arguments before the D.B

Member Chairman

10.07.2018 **Neither appellant nor his counsel present. None is present as representative on behalf of the respondents. However, Mr. Usman Ghani, District put appearance on their behalf and requested for adjournment. Granted. To come up for written reply/comments on 28.08.2018 before S.B.**

Chairman

28.08.2018 Appellant in person and Mr. Kabirullah Khattak AAG for the respondent present. Written reply not submitted on behalf of the respondents. Learned AG seeks adjournment. Adjourned. To come up written reply/comments on 22.10.2018 before S.B

(Muhammad Amin Kundi)
Member

22.10.2018 Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 06.12.2018.

READER

06.12.2018 Appellant alongwith counsel and Addl. AG alongwith Wisal Muhammad, ADO for the respondents present.

Written comments on behalf respondent No. 4 has been submitted. Other respondents shall be required to submit their respective comments positively.

Adjourned to 16.01.2019 before S.B.

Chairman

13.03.2018 Appellant in person present and seeks adjournment on the ground that his counsel is busy in the Hon'ble Peshawar High Court. Adjourned. To come up for preliminary hearing on 30.04.2018 before S.B.

(Muhammad Amin Khan Kundi)
Member

03.04.2018 Appellant present and submitted amended appeal which is placed on file. Preliminary arguments of the appellant heard.

In the present appeal the appellant has prayed for the grant of Special Compensatory Allowance from December 2015 instead of July 2015, Pre-Mature Increment from December 2015; along with Arrears till date and Medical Allowance @ Rs.1875/ and Arrears w.e.f 01.07.2015

Points raised in the memo of appeal need consideration. Admitted for regular hearing subject to all just/legal objections. The appellant is directed to deposit process fee and security within 10 days, thereafter notice be issued to respondents for written reply/comments. To come up for written reply/comments on 30.05.2018 before S.B

Appellant Deposited Security & Process Fee

Member

23.05.2018 Appellant in person present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Written reply not submitted. Learned Additional AG seeks adjournment. Adjourned. To come up for written reply/comments on 10.07.2018 before S.B.

(Muhammad Amin Khan Kundi)
Member

Form-A

FORMOF ORDERSHEET

Court of_____

Case No. **160/2018**

S.No.	Date of order proceedings	Order or other proceedings with **signature** of judge
1	2	3
1	02/02/2018	The appeal of Mr. Abdul Haye resubmitted today by Mr. Asif Ali Shah Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please. REGISTRAR
2-	07/02/18.	This case is entrusted to S. Bench for preliminary hearing to be put up there on 19/02/18. CHAIRMAN
	19.02.2018	Appellant in person present and seeks adjournment as his counsel is not in attendance today. Adjourned. To come up for preliminary hearing on 13.03.2018 before S.B. (Gul Zeb Khan) Member

The appeal of Mr. Abdul Haye SST, GHSS Shabqadar Fort Charsadda received today i.e. on 16.01.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- The law under which appeal is filed is wrong.
2- Copy of impugned order is not attached with the appeal which may be placed on it.
3- Annexures of the appeal may be attested.
4- Page no. 5 of the appeal is illegible which may be replaced by legible/better one.
5- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 126 /S.T,

Dt. 17/01 /2018

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asif Ali Shah Adv. Pesh.

R/Sir.

1. Section of law correctly mentioned.
2. That the appeal/representation is not decided in statutory period, hence, no order is available.
3. The attestation is done.
4. The copy is legible.
5. Copy of appeal alongwith complete annexures is submitted.

Requests for fixing the appeal before Hon'ble Bench.

Advocate

Dated: 02/02/2018.

BEFORE THE SERVICE TRIBUNAL K.P.K. PESHAWAR

Service Appeal No. 160 /2018

Abdul Haye.....Appellant

Versus

Government & Others.....Respondents

INDEX

PETITIONER
Through:

Asif Ali Shah
Advocates High Court,
Peshawar

(1)

BEFORE THE SERVICE TRIBUNAL K.P.K. PESHAWAR

Service Appeal No. 160 /2018

Abdul Haye, (SST)
Government Higher Secondary School, Shabqadar Fort, Charsadda..
.....Appellant

Khyber Pakhtukhwa Service Tribunal
Diary No. 49
Dated 16/1/2018

Versus

1. **Government of KPK**, through, Secretary Finance, KPK, Peshawar.
2. Accountant General, KPK, Peshawar.
3. Director, Elementary & Secondary Education, K.P.K., Peshawar.
4. District Education Officer (male, Charsadda.
5. District Account Officer, Charsadda.

SERVICE APPEAL UNDER SECTION-4 OF THE CIVIL SERVANT ACT, 1974 AGAINST THE ACT OF THE RESPONDENT WHO STOPPED THE SALARY OF THE APPELLANT

Prayer in Appeal:

ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED:

Filed to day
16/1/18
Registrar

I. **TO GRANT SPECIAL COMPENSATORY ALLOWANCE 2015-16 ALONG WITH ARREARS TILL DATE;**
II. **PRE-MATURE INCREMENT FROM DECEMBER 2015; AND**
III. **MEDICAL ALLOWANCE @ RS. 1875/-.**

Respectfully Sheweth!

The appellant humbly submits as under:-

1. That the appellant is serving as SST and performing his duties to the satisfaction of his superiors.

2. That respondent No.1 issued a notification regarding special compensatory allowance and the appellant being entitled and deserving for the same, opted for the same allowance through written request.
{Copies of notification & application are attached as Annexure-A&B}

3. That the appellant was receiving less medical allowance of his grade and scale that's why the appellant filed so may application / representations and thereafter, the competent Authority was pleased to correct the medical allowance @ Rs. 1875.
{Copy of salary slip is attached as Annexure-C}

4. That it is utter to shock that the respondents with out any reasons again reduced the medical allowance of the appellant to Rs.1500/- and respondents also failed to grant him special compensatory allowance and one premature increment, the appellant sent so may departmental applications / representation but no positive response.
{Copy of salary slip is attached as Annexure-D}

5. That the appellant again submitted a written application to Respondent No.1 but of no avail and no response till the expiry of statutory period.
{Copy of application is attached as Annexure-E}

10. That the appellant was aggrieved from these acts of the Respondents preferred the instant appeal to this Hon'ble Tribunal for the redressal on the grounds inter-alia:-

GROUNDS:

A. That the appellant is victimized by the orders passed by the competent authority and such practice adversely effects efficiency of incumbents and also reduces their confidence and faith in public.

B. That the appellant has excellent service record and his moral character was too excellent, hence the Respondent have no right to do great discrimination with the appellant.

C. That the appellant is very hardworking and punctual in his duty, therefore, no complaint received by the Respondents against the appellant but the Respondent unlawfully interfered in the medical allowance of the appellant, and not granting compensatory allowance and premature increment which is against the law and fundamental rights of the appellant.

D. That the appellant was condemned unheard, his departmental appeal was not properly adjudicated and the silence of the department on the said appeal shows the

malafide of the Respondents, hence needs interference of this Hon'ble Court.

E. That this conduct of the Respondent has not only enhanced the agonies of the Appellant, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on the part of the Respondent which needs to be judicially handled and curbed, inorder to save the poor masses and provide them an opportunity to lead their lives freely and with the enjoyment of all of their fundamental rights, which are provided for them in the Constitution of Islamic Republic of Pakistan 1973.

F. That the Respondent erroneously exercised their discretion against judicial principle passed the impugned orders of reduction of medical allowance, not awarding compensatory allowance and one premature increment , by this way they have opened a new pandora box in clear violation of Service law.

IT IS, THEREFORE, MOST RESPECTFULLY PRAYED THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED:

i. **TO GRANT SPECIAL COMPENSATORY ALLOWANCE 2015-16 ALONG WITH ARREARS TILL DATE;**
ii. **PRE-MATURE INCREMENT FROM DECEMBER 2015; AND**
iii. **MEDICAL ALLOWANCE @ RS. 1875/-.**

Appellant

Through:

ASIF ALI SHAH
&
Bilal Khan Khalil
Advocate, Peshawar

Dated: 06/11/2017

VERIFICATION:

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate

Note: That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Advocate

TO BE SUBSTITUTED IN THE SAME NO. AND DATE

(14)

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)
NO. KC/FD/SO(FR)/7-20/2015/3318
Dated Peshawar, the 23-02-2017

Annex-A

To

The Accounts Officer (HAD)
Accountant General Office
Khyber Pakhtunkhwa, Peshawar.

Subject: **UPGRADATION OF CLASS IV AND SANCTION OF SPECIAL COMPENSATORY ALLOWANCE 2015-16**

Dear Sir

I am directed to refer to the correspondence resing with this department vide your letter No. H-24/Promotion / Fixation 2015-16/14 dated 21-06-2016 on the subject noted above and to inform that a meeting under the chairmanship of Secretary Finance was held on 31-01-2017 comprising Deputy Accountant General & Accounts Officer of Accountant General Office as well as other members to discuss the observations made by Accountant General Office regarding grant of Compensatory Allowance to the employees of Provincial Government of BPS-16 under this department notification of even No dated 30-06-2015. On second thoughts it was unanimously decided that the Compensatory Allowance will be granted to all entitled employees on the following rate.

> **"Difference of Basic Pay of an employees on 01-07-2015 in BPS-16 and next stage in BPS-17 on 01-07-2015 alongwith one premature increment plus difference of House Rent allowance at frozen level"**

It is, however, added that the employees residing in government accommodation or receiving house subsidy allowance shall not be entitled to receive the difference of house rent / house subsidy in the Special Compensatory Allowance. Moreover, the said allowance will discontinue on promotion of an employee to BPS-17 as well as the employees appointed after **30-06-2010** and those who availed upgradation from 01-07-2010 or the employees drawing 40% extra / special allowances shall not be entitled to the special compensatory allowance.

Yours faithfully,

SECTION OFFICER (FR)

Attested

Copy is forwarded to the:-

All Admin ...

A-XDVNA

Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Department
No.SOG/E&SE/2-4/2015
Dated Peshawar the 24/08/2015

To

All Dirs.
E&SE in Khyber Pakhtunkhwa

Subject: NOTIFICATION

I am directed to refer to the subject noted above and to enclose herewith a Copy of Notification No.FD/SO(FR)7-20/2015 dated 30.06.2015 received from Section Officer (FR), Finance Department, Govt. of Khyber Pakhtunkhwa Peshawar, which is self-explanatory, for further necessary action.

Encl: As Above

(-Sd-)
Muhammad Abbas Khan
Section Officer (General)

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

Endst: No 4392-4442/F.No.62/Vol:2/G. Notification/G.Branch Dated Pesh: 26.08.15

Copy forwarded for information and necessary action to the:-

1- All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
2- Section Officer (General) Govt: of Khyber Pakhtunkhwa E&SE: Department w/r to his No. cited above.
3- PA to Director E&SE local office.

(-Sd-)
Deputy Director Establishment
E&SE Khyber Pakhtunkhwa Peshawar.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

Endst:No 10231-37 /Dated 9/9/2015

Copy forwarded to:-

1- Section Officer(G) Govt: of Khyber Pakhtunkhwa Peshawar.
2- Director E&SE Khyber Pakhtunkhwa Peshawar.
3- District Accounts Officer Charsadda.
4- Deputy District Education Officer local office.
5- All the Principals/ Head Masters GHSS/GHS/ in District Charsadda.
6- Cash [illegible]
7- Office file.

9/9/015

DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

Attested

6 13

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)
Dated Peshawar, the 30-06-2015

NOTIFICATION

NO.FD/SO(FR)7-20/2015 The competent authority has been pleased to accord approval to the upgradation of pay scales of the following provincial government employees with effect from 01-07-2015:

a) Two pay scale upgradation will be allowed to all provincial government employees from BS-01 to BS-05.

b) One pay scale upgradation will be allowed to all provincial government employees from BS-06 to BS-15

c) Special Compensatory Allowance equal to difference of notional upgradation of BS-16 to BS-17 will be allowed to all provincial government employees in BS-16 in lieu of upgradation.

d) Upgradation will be applicable to both pay and allowances with freezing limits and other conditions currently in vogue unless revised by the government.

e) Pay fixation on upgradation will be applicable w.e.f. 01-07-2015 or 01-12-2015 on the option to be given by the concerned employee.

f) All provincial government employees who have been upgraded en-block or individually in last five years starting from 01-07-2010 or have been granted special allowance / pay equal to 40 % or more of their normal pay shall not be entitled to [illegible] upgradation.

2. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.

3. All the concerned Departments will amend their respective service rules to the same [illegible] the present [illegible]

4. The above upgradation scheme shall not be applicable to employees of Autonomous Bodies, Semi Autonomous Bodies and Public Sector Companies.

5. *Explanatory note and subsidiary instructions on the subject will be issued separately.*

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Attested

خدمت جناب ڈسٹرکٹ اکاؤنٹس آفیسر صاحب ضلع چارسدہ صوبہ KPK

(7)

Premature Increment — درخواست برائے

معذرت

Annex-B

جناب عالی

مودبانہ گزارش ہے کہ بندہ $\frac{01}{2009}$ سے محکمہ ایجوکیشن کی ایمرجنسی ایجوکیشنل
ایجوکیشنل ضلع چارسدہ میں SST(G) گریڈ (16) میں کام کر رہا ہے گریڈ 16
کے لیے صوبائی حکومت کے Allowance Sp: Compensatory ایک عدد
KC/FD/SO(FR)729/2015/3318 کے اعلان کیا ہے جسکا نوٹیفکیشن
Employee Dated $23\frac{02}{2017}$ سے اسی کے ابتدائی نوٹیفکیشن میں
کو یہ اختیار دیا گیا ہے کہ وہ یہ الاؤنس $01\frac{07}{2015}$ یا $1\frac{12}{2015}$
لینا چاہتا ہے چونکہ مجھے یہ حق حاصل ہے (لہٰذا) لیے میں یہ
option دیتا ہوں کہ مجھے یہ الاؤنس $2\frac{12}{2015}$ (ایک عدد) لگوایا جائے
کیونکہ دسمبر 2015 سے یہ الاؤنس لیتے ہیں ایک عدد
Premature Increment کا مقدار ہو جاتا ہوں۔ اس لیے میری
درخواست یہ ہے کہ میری Pay fixation دسمبر 2015 سے
کی جائے۔

عین نوازش ہوگی۔

$10\frac{04}{2017}$ مورخہ:

العارض

عبدالحق SST(G) Personal No 0038944 BPS (16)

گورنمنٹ شہید سیف اللہ درانی ماڈل سکول شبقدر فورٹ

No = 886 Dated 10/04/2017

Forwarded to the DAO Charsadda

For Favourable Consideration & Necessary action Pl.

A Hested

10/4/017

Principal
Govt. Higher Secy. School

VNNTK – B

(8)

بخدمت جناب ڈسٹرکٹ اکاؤنٹس آفیسر صاحب ضلع چارسدہ (KPK)

بحالی سپیشل کمپنسیٹری الاؤنس

مضمون:

جناب عالی

مودبانہ گزارش ہے کہ بندہ 1-1-2009 سے SST گریڈ (16) میں (E&SE) چارسدہ (موبل) کام کر رہا ہے بندہ کی سپیشل کمپنسیٹری الاؤنس کو آپ کے افس والوں نے under consideration ہونے کی بنیاد پر اکتوبر 2016 کو روک لیا۔ اب چونکہ محکمہ خزانہ نے ایک واضح نوٹیفکیشن 23/02/2017 کو جاری کیا ہے۔ جس کا نمبر No. KC/FD/SO(FR)/7-20/2017/3318 Date 23-02-2017

لہٰذا اس درخواست کے ذریعے آپ سے گزارش ہے کہ بندہ کی سپیشل کمپنسیٹری بمعہ اسکے بقایاجات کے دوبارہ جاری کرنے کی یہ کام فی دیں۔

عین نوازش ہوگی۔

8/02/17 مورخہ

العارض

عبدالحی (SST)

BPS-(16)

گورنمنٹ شہید رحیم اللہ درانی ہائی سکول شبقدر فورٹ ضلع چارسدہ

No: ——— Dated: 8/3/017

Forwarded to the DAO Charsadda with the remarks that as per Finance Deptt. letter, the applicant is entitled to the said allowance. (Copy attached)

Attested

Annex-C

(9)

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (October-2016)

sonal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 08 Years 11 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 161,202.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	24,840.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	1,875.00
1948	Adhoc Allowance 2010@ 50%	3,500.00	2148	15% Adhoc Relief All-2013	740.00
2199	Adhoc Relief Allow @10%	504.00	2211	Adhoc Relief All 2016 10%	2,484.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-250.00
3609	Income Tax	-89.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,945.00	24,715.00

Deductions - Income Tax

Payable: 1,803.80 Recovered till October-2016: 375.00 Exempted: 720.96 Recoverable: 707.84

Gross Pay (Rs.): 40,761.00 **Deductions: (Rs.): -8,865.00** **Net Pay: (Rs.): 31,896.00**

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

Attested

System generated document in accordance with APPM 4.6.12.9 (SERVICES/02.11.2016/16:08:51/v1.1)
** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Acknowledgement Reciept

Received Rs______________ from the Principal/Head Master GHS/GHSS ______________________ @ of Rs 15/Student of ______________ ______________ Group______________________ students as Annual Sport Fee E & SE (M) Department Charsadda.

Shahzar Khan
Genenral Secretary Sports
Charsadda

Acknowledgement Reciept

Received Rs______________ from the Principal/Head Master GHS/GHSS ______________________ @ of Rs 15/Student of ______________ ______________ Group______________________ students as Annual Sport Fee E & SE (M) Department Charsadda.

Shahzar Khan
Genenral Secretary Sports
Charsadda

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Shahzar Khan
Genenral Secretary Sports
Charsadda

Acknowledgement Reciept

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Shahzar Khan
Genenral Secretary Sports
Charsadda

Annex-G

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (September-2016)

(10)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 08 Years 10 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 153,451.00
Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	24,840.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,853.00
1947	Medical Allow 15% (16-22)	1,875.00	1948	Adhoc Allowance 2010@ 50%	3,500.00
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @10%	504.00
2211	Adhoc Relief All 2016 10%	2,484.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-250.00
3511	Addl Group Insurance	-19.00	3604	Group Insurance	-173.00
3609	Income Tax	-155.00	3990	Emp.Edu. Fund KPK	-125.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,945.00	29,660.00

Deductions - Income Tax

Payable: 2,793.35 Recovered till September-2016: 286.00 Exempted: 1116.85 Recoverable: 1,390.50

Gross Pay (Rs.): 43,614.00 **Deductions: (Rs.): -8,473.00** **Net Pay: (Rs.): 35,141.00**

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

Principal
Govt:Shaheed Saif Ullah Durani
High School Shabqadar Fort

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...mounts are in Pak Rupees
...omissions excepted

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (July-2016)

11

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 08 Years 08 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 138,480.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	24,840.00	1000	House Rent Allowance	1,818.00
1554	Spl. Comp. Allowance	2,853.00	1947	Medical Allow 15% (16-22)	1,875.00
1948	Adhoc Allowance 2010@ 50%	3,500.00	2148	15% Adhoc Relief All-2013	740.00
2199	Adhoc Relief Allow @10%	504.00	2211	Adhoc Relief All 2016 10%	2,484.00
5012	Adjustment Medical All	4,500.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2275	-2,275.00	3501	Benevolent Fund	-250.00
3511	Addl Group Insurance	-19.00	3604	Group Insurance	-173.00
3609	Income Tax	-64.00	3990	Emp.Edu. Fund KPK	-125.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,945.00	39,550.00

Deductions - Income Tax

Payable: 1,267.34 Recovered till July-2016: 64.00 Exempted: 506.27 Recoverable: 697.07

Gross Pay (Rs.): 43,114.00 **Deductions: (Rs.): -7,851.00** **Net Pay: (Rs.): 35,263.00**

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

Attested

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** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (March-2017)

Annex-D

(12)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 09 Years 04 Months 001 Days

Employment Category: Vocational Temporary
Designation: SENIOR ENGLISH TEACHER
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA 80001086-DISTRICT GOVERNMENT KHYBE
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 199,947.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 8

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	26,120.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,697.00
1947	Medical Allow 15% (16-22)	1,500.00	1948	Adhoc Allowance 2010@ 50%	3,500.00
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @10%	504.00
2211	Adhoc Relief All 2016 10%	2,612.00	5058	Adj Spl. Comp. Allowance	11,145.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-225.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00	5012	Adjustment Medical All	-7,500.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,935.00	0.00

Deductions - Income Tax
Payable: 2,873.95 Recovered till March-2017: 1,051.00 Exempted: 1149.15 Recoverable: 673.80

Gross Pay (Rs.): 55,636.00 **Deductions: (Rs.): -17,066.00** **Net Pay: (Rs.): 38,570.00**

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X
Temp. Address: Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
City: Email: abdulhaye9@gmail.com

Attested

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** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Annex-5

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (April-2017)

13

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 09 Years 05 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 202,753.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	26,120.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,697.00
1947	Medical Allow 15% (16-22)	1,500.00	1948	Adhoc Allowance 2010@ 50%	3,500.00
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @10%	504.00
2211	Adhoc Relief All 2016 10%	2,612.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-225.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00	4200	Professional Tax	-200.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 2,873.95 Recovered till April-2017: 1,276.00 Exempted: 1149.01 Recoverable: 448.94

Gross Pay (Rs.): 44,491.00 **Deductions: (Rs.): -4,831.00** **Net Pay: (Rs.): 39,660.00**

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

Attested

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** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Annex-E

(14)

خدمت جناب ڈائریکٹر E&SE ویپارٹمنٹ موبائل مینیجمنٹ

Premature Increment اپیل برائے

عنوان :- تصحیح انکریمنٹ الاؤنس

جناب عالی

مودبانہ گزارش ہے کہ موبائل حکومت نے گریڈ (16) کے موبائل ملازمین کے لیے Special compensatory allowance کا اجراء 01.07.2015 میں کیا تھا۔ جسکا حوالہ 23.08.2017 کو محکمہ خزانہ ایک اور نوٹیفکیشن کے ذریعے کیا گیا اور نوٹیفکیشن کے مطابق (16) ملازمین کے لیے ایک عدد پری مچیور انکریمنٹ کا بھی اجراء کیا گیا۔ بندہ کو (D.A.O) ڈسٹرکٹ اکاؤنٹس نے یہ کہتے ہوئے پری مچیور انکریمنٹ دینے انکار کر دیا ہے کہ بندہ کے گریڈ (16) کے Bps 19120 روپے اور گریڈ 17 بیسک Pay 20680 کا فرق 1560 روپے ہے اسلئے بندہ پری مچیور انکریمنٹ کا حقدار نہیں ہے۔ جبکہ گریڈ (17) کا سالانہ انکریمنٹ 1555/- روپے ہے کیونکہ 01.07.15 کو پری مچیور کے قانون کے مطابق بندہ کو یہ option دیا گیا کہ بندہ پے فکسیشن کی pay fixation موبائل حکومت کے جاری کردہ نوٹیفکیشن کے Para (e) کے تحت 02.12.2015 سے کی جائے۔ جبکہ جواب الفرض یہ دیا ہے کہ چونکہ تمہاری اپگریڈیشن نہیں ہوئی ہے اس لئے پری مچیور انکریمنٹ کی یہ بنیادی اصول کے تحت option دینے کے حقدار نہیں ہو۔ صرف کی بات یہ ہے کہ D.A.O صاحب ضلع چارسدہ اپنی ایک ہی خط میں ایک طرف لکھتا ہے کہ پری مچیور انکریمنٹ قانون کے مطابق 01.07.2015 کو چونکہ تمہاری Bps 17 اور گریڈ 17 کے Bps (20680) (19120) کا فرق 1560 روپے ہے جو کہ گریڈ (17) کے سالانہ انکریمنٹ (1555/-) سے زیادہ ہے جبکہ اسی خط میں دوسری طرف لکھتا ہے کہ مجھے پری مچیور انکریمنٹ کے قانون کا اطلاق نہیں ہو سکتا ہے کیونکہ میری اپگریڈیشن نہیں ہوئی ہے۔ D.A.O صاحب کے خط کے یہ دو متضاد بیانات آپ کی خدمت میں پیش ہیں۔

It is brought to your notice that there is a difference of pay in Bps-16 on 01.07.15 Rs 19120/- and Bps-17 Rs 20680/- of Rs 1560 - which more than the increment of Bps-17 on 1.07.15. The increment of Bps-17 on 1.07.2015 is Rs 1555/- and so no premature increment in the notional pay fixation in Bps-17 on 01.07.2015 for the compensatory allowance is admissible in your case.

جبکہ دوسری طرف اسی خط میں کچھ یوں لکھتا ہے۔

P.T.O.

Attested

Recd on 4/5/17

Recd 4/5/17

ANNEX-E

Your case was examined, you are serving on the same scale BPS-16 since your appointement on SST post on 01/09/2009 and no change of scale has taken place in your case and so there is no need for the exercise of option as para (E) KPK finance department Notification No FD/S(PR)7-20/2015.

اس درخواست کے اس ضمنی فرلو کاپی بھیج دیا ہوں۔ میڈیکل الاؤنس کی تصحیح کے لیے میں 03/05/2016 کو درخواست دی جس پر کوئی کارروائی نہیں کی گئی اس کے بعد میں کورٹ میں 1500 (M.A) 875 مقرر کی ہوئی غلط تھی۔ اب مارچ 2017 میں انہوں نے (M.A) واپس 1500/- کر دی اور 7500 روپے کی ریکوری بھی کی۔ حیرت کی بات یہ ہے کہ کلاس فور ملازمین کی 1500 روپے ماہوار میڈیکل الاؤنس لے رہے ہیں اور میں گریڈ (16) میں 1800 روپے میڈیکل الاؤنس کے رہا ہوں۔ بندہ کو انصاف فراہم کرنے کی گزارش ہے۔

03/05/2017

مورخہ:

العبد

عبدالحی (SST)
BPS (16)
گورنمنٹ شہید سیف اللہ خان ہائی سکول شبقدر فورٹ
فون نمبر 03005395251 ضلع چارسدہ

Pergand No:- 00389438
CNIC No:- 17101-0269597-5

No 898 Dated 03/05/2017

Forwarded to the quarter concerned

Principal
Govt. Shahid Saifullah Khan
High School Shabqadar Fort

بخدمت جناب اکاؤنٹنٹ جنرل صوبہ خیبر پختونخوا پشاور

(15)

درخواست برائے Medical allowance, Compensatory allowance
و Pre-mature Increment

جناب عالی!

1. یہ کہ سائل نے ڈائریکٹر ایجوکیشن DAO پشاور
دیگر افسران کو کئی درخواست جات برائے Compensatory allowance
و Pre-mature increment, Medical allowance دی تھی۔

2. یہ کہ نہ تو سائل کو کوئی ایلاؤنس دی ہے بلکہ متذکرہ الاؤنس
میں کٹوتی کر کے کم کر دی ہے۔ جو کہ ناانصافی ہے۔

3. یہ کہ آپ جناب میرے کیس کو مدنظر رکھ کر
متذکرہ بالا الاؤنسز دی جائیں۔

استدعا ہے کہ میری اس درخواست کو
مدنظر رکھ کر درج بالا Allowances
و Increment عنایت فرمائیں۔

Attested

10
2012

العارض
عبدالحق
SST
گورنمنٹ ہائیر سیکنڈری سکول شبقدر فورٹ
چارسدہ

بعدالت سروس ٹریبونل خیبر پختونخوا

سائل

بنام گورنمنٹ خیبر پختونخوا

عبدالہی

2 منجانب

مورخہ ـــــــــــ

مقدمہ ـــــــــــ اپیل

دعویٰ ـــــــــــ

جرم ـــــــــــ

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام پشاور کیلئے آصف علی شاہ اینڈ بدل خان خلیل ایڈووکیٹس مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارعرضی دعوی اور درخواست ہر قسم کی تصدیق زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برامدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند رہے۔

المرقوم 16 ماہ جنوری 2018ء

العبد گواہ العبد

بمقام پشاور کے لئے منظور ہے۔

Accepted

0333 9006806

0333 930 2460

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 160/2018

Abdul Haye

Vs

District Education Officer & others.

Written comments on behalf of Respondent No. 04

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DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 160/2018

Abdul Haye

Vs

District Education Officer & others

Written comments on behalf of Respondent No. 04

Respectfully Sheweth:

Preliminary Objections:

A. That the Appellant has no locus standi and cause of action.

B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore, the Appeal is liable to be rejected/ dismissed.

C. That the Appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory costs in favour of Respondents.

D. That no legal right of the appellant has been violated, therefore, the appellant has no right to file the instant appeal.

E. That the Appellant is completely estopped/precluded by his own conduct to file this Appeal.

G. That the Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from mis-statements and concealment of facts and as such the Appellant is not entitled to equitable relief.

H. That the Appellant has no right to file the instant Appeal and the Hon' able Services Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.

I. That the instant appeal is barred by law and limitation.

PARA WISE REPLY ON FACTS:

1. That the Para needs no comments.
2. That as the Para related to Respondent No. 01, therefore, best be answered by Respondent No. 01.
3. That the Para needs no comments.

4. That the Para is related to Answering Respondents No. 01, 02, & 05 and best be answered by them.
5. That the Para as stated needs reply from Answering Respondent No. 01.
6. That the appellant is not an aggrieved party hence has no right to file the instant appeal before this Hon'ble Services Tribunal and is liable to be dismissed of the following grounds inter-alia amongst other.

PARA WISE REPLY ON GROUNDS.

A. Incorrect, that the Answering Respondents acted in accordance with law, rules and policy on the subject.
B. That the Para related to the personal information of the appellant, therefore, needs cogent evidence.
C. That the Para related to the personal information of the appellant, therefore, needs cogent evidence.
D. Incorrect, the Answering Respondents are acted in accordance with the law, rules and policy on the subject.

E&F. Incorrect, the Answering Respondents are law obeying and law observing officials and can't think of little deviation from the prevailing laws, hence, acted in accordance with law and rules on the subject.

Respondent

4. The District Education Officer (Male) Charsadda.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 160/2018

Abdul Haye

Vs

District Education Officer & others

Written comments on behalf of Respondent No. 04

AFFIDAVIT

I Mr. Siraj Muhammad DEO (M) Charsadda do hereby solemnly affirms that the contents of the Para-wise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able court.

Deponent

Siraj Muhammad
DEO (MALE)
Charsadda CNIC: 17301-2831355-9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 160/2018

Mr. Abdul Hayee.....Appellant

V/S

Government of Khyber Pakhtunkhwa through Secretary, Finance Department Peshawar & Others.....Respondents

(Reply on Behalf of Respondent No. 2 & 5)

Preliminary Objections:-

1. That the appellant has no cause of action.
2. That the appellant has no locus standi.
3. That the appeal in hand is not maintainable.
4. That the instant appeal is time barred.
5. That the appellant is not come to this court with clean hands.

Respectfully sheweth:-

Para 1:- No Comments.

Para 2:- That Special Compensatory Allowance is admissible to BPS-16 equal to difference of notional up gradation of BPS-16 to BPS-17, which has already been paid to the appellant and can be verified from the Salary Slips. (Annex- A to E).

Para 3:- That Medical Allowance @ 15% was admissible on the pay which has been drawn on 30.6.2011 on frozen level to employees already in service. (Pay Revision 2011 Copy enclosed at Annex F). Later on an increase in Medical Allowance has been allowed @ 25% with effect from 1-7-2015, on the existing amount of Medical Allowance being admissible on 30.06.2015.(Pay Revision 2015 Annex-G). The appellant was drawing his medical allowance as Rs.1050/- on 30.06.2011 on frozen level, therefore he was entitled to Medical Allowance @ 25% on 1.7.2015 which comes to Rs. (1050 X 25% =263 + 1050 = **1313**). As per Govt. orders, the Medical Allowance, in no case, should be less than Rs.**1500/-** P.M., so the Medical Allowance has correctly been paid.

Para 4:- That actual Medical Allowance was admissible Rs.1500/- PM according to Rules but wrongly drawn Rs. 1875/- PM w.e.f 7/2015 to 28/02/2017 (20 Months. Thus the Medical Allowance was corrected and the over drawn amount (1875-1500 = 375 X 20 = 7500/-) was deducted in lump sum during 03/2017. (Payroll Attached).

Under Para 10(i) of Pay Revision Rules 1978, if Fixation of pay gives increase equal to or less than a full increment of the pay scale, the initial in Basic Pay Scale of the higher post shall be fixed after allowing a premature increment. In the instant case his pay fixation gives him the benefit of more than an increment, thus the Appellant is not entitled to Premature Increment and actual Special Compensatory Allowance thus admissible @ Rs. 2679/- PM. The appellant has drawn the said allowance @ Rs. 2853/- PM. w.e.f 12/2015 to 30/09/2016 (10 Months). During the period w.e.f 01/10/2016 to 28/02/2017 (5 Months) the allowance was not drawn through computer and in 3/2017, correct rate of Special Compensatory allowance i.e. Rs. 2697/- PM was allowed along with arrear Rs. 11145/- not drawn during 10/2016 to 2/2017. (Copy enclosed).

Para 5:- Relates to Respondent No. 1, hence no comments.

Para 6:- No comments.

Grounds.

(A) That Respondents No. 2 & 5 are bound to follow the rules and instruction issued by the Provincial Government Khyber Pakhtunkhwa for time to time.

(B) Relates to record, however liable to be proved by the appellant.

(C) As mentioned in Para 4 above.

(D) Not related.

(E) Not related.

(F) As mentioned Para 3 & 4 above.

Keeping in view the above mentioned facts it is therefore humbly prayed that the appeal in hand having no merits may be dismissed with cost.

DISTRICT ACCOUNTS OFFICER
CHARSADDA

ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (July-2016)

11

Personal Information of Mr ABDUL HAYE d/w/s of ABEUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:

Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 08 Years 08 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: No GPF Balance: 138,480.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 7

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	24,840.00	1000	House Rent Allowance	1,818.00
1554	Spl. Comp. Allowance	2,853.00	1947	Medical Allow 15% (16-22)	1,875.00
1948	Adhoc Allowance 2010@ 50%	3,500.00	2148	15% Adhoc Relief All-2013	740.00
2199	Adhoc Relief Allow @10%	504.00	2211	Adhoc Relief All 2016 10%	2,484.00
5012	Adjustment Medical All	4,500.00			0.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3016	GPF Subscription - Rs2275	-2,275.00	3501	Benevolent Fund	-250.00
3511	Addl Group Insurance	-19.00	3604	Group Insurance	-173.00
3609	Income Tax	-64.00	3990	Emp.Edu. Fund KPK	-125.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,945.00	39,550.00

Deductions - Income Tax

Payable: 1,267.34 Recovered till July-2016: 64.00 Exempted: 506.27 Recoverable: 697.07

Gross Pay (Rs.): 43,114.00 Deductions: (Rs.): -7,851.00 Net Pay: (Rs.): 35,263.00

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar, I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status:.No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

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** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Pay slip 6/2015

Medi. 1050
@25% 263
= 1313

1500/=

7960 × 15% = 1194
× 25% = 298
1888

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (September-2016)

(10)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 08 Years 10 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 153,451.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	24,840.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,853.00
1947	Medical Allow 15% (16-22)	1,875.00	1948	Adhoc Allowance 2010@ 50%	3,500.00
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @10%	504.00
2211	Adhoc Relief All 2016 10%	2,484.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-250.00
3511	Addl Group Insurance	-19.00	3604	Group Insurance	-173.00
3609	Income Tax	-155.00	3990	Emp.Edu. Fund KPK	-125.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,945.00	29,660.00

Deductions - Income Tax

Payable: 2,793.35 Recovered till September-2016: 286.00 Exempted: 1116.85 Recoverable: 1,390.50

Gross Pay (Rs.): 43,614.00 Deductions: (Rs.): -8,473.00 Net Pay: (Rs.): 35,141.00

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

Principal
Govt:Shaheed Saif Ullah Durani
High School Shabqadar Fort

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...omissions excepted

Annex-C

(9)

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (October-2016)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:

Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 08 Years 11 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: No GPF Balance: 161,202.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	24,840.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	1,875.00
1948	Adhoc Allowance 2010@ 50%	3,500.00	2148	15% Adhoc Relief All-2013	740.00
2199	Adhoc Relief Allow @10%	504.00	2211	Adhoc Relief All 2016 10%	2,484.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-250.00
3609	Income Tax	-89.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
0505	GPF Loan Principal Instal	89,000.00	-4,945.00	24,715.00

Deductions - Income Tax

Payable: 1,803.80 Recovered till October-2016: 375.00 Exempted: 720.96 Recoverable: 707.84

Gross Pay (Rs.): 40,761.00 Deductions: (Rs.): -8,865.00 Net Pay: (Rs.): 31,896.00

Payee Name: ABDUL HAYE

Account Number: 00545001

Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar, I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

City: X

Temp. Address: Email: abdulhaye9@gmail.com

City:

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** All amounts are in Pak Rupees*

** Errors & omissions excepted*

Acknowledgement Reciept

Received Rs______________ from the Principal/Head Master GHS/GHSS
______________ Group______________ @ of Rs 15/Student of ______________
students as Annual Sport Fee E & SE (M) Department Charsadda.

Shahzar Khan
Genenral Secretary Sports
Charsadda

Acknowledgement Reciept

Received Rs______________ from the Principal/Head Master GHS/GHSS
______________ Group______________ @ of Rs 15/Student of ______________
students as Annual Sport Fee E & SE (M) Department Charsadda.

Shahzar Khan
Genenral Secretary Sports
Charsadda

Acknowledgement Reciept

Received Rs______________ from the Principal/Head Master GHS/GHSS
______________ Group______________ @ of Rs 15/Student of ______________
students as Annual Sport Fee E & SE (M) Department Charsadda.

Shahzar Khan
Genenral Secretary Sports
Charsadda

Acknowledgement Reciept

Received Rs______________ from the Principal/Head Master GHS/GHSS
______________ Group______________ @ of Rs 15/Student of ______________
students as Annual Sport Fee E & SE (M) Department Charsadda.

Shahzar Khan
Genenral Secretary Sports
Charsadda

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (March-2017)

Anuex-D

(12)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM
Personnel Number: 00389438 CNIC: 1710102625975
Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 NTN:
Length of Service: 09 Years 04 Months 001 Days

Employment Category: Vocational Temporary
Designation: SENIOR ENGLISH TEACHER
DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA 80001086-DISTRICT GOVERNMENT KHYBE
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: Interest Applied: No GPF Balance: 199,947.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 8

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	26,120.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,697.00
1947	Medical Allow 15% (16-22)	1,500.00	1948	Adhoc Allowance 2010@ 50%	3,500.00
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @10%	504.00
2211	Adhoc Relief All 2016 10%	2,612.00	5058	Adj Spl. Comp. Allowance	11,145.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-225.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00	5012	Adjustment Medical All	-7,500.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	89,000.00	-4,935.00	0.00

Deductions - Income Tax
Payable: 2,873.95 Recovered till March-2017: 1,051.00 Exempted: 1149.15 Recoverable: 673.80

Gross Pay (Rs.): 55,636.00 **Deductions: (Rs.):** -17,066.00 **Net Pay: (Rs.):** 38,570.00

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X
Temp. Address: Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
City: Email: abdulhaye9@gmail.com

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** Errors & omissions excepted*

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Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (April-2017)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:

Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 09 Years 05 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: No GPF Balance: 202,753.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2016 Pay Scale Type: Civil BPS: 16 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	26,120.00	1000	House Rent Allowance	1,818.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,697.00
1947	Medical Allow 15% (16-22)	1,500.00	1948	Adhoc Allowance 2010@ 50%	3,500.00
2148	15% Adhoc Relief All-2013	740.00	2199	Adhoc Relief Allow @10%	504.00
2211	Adhoc Relief All 2016 10%	2,612.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs2806	-2,806.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-225.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00	4200	Professional Tax	-200.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 2,873.95 Recovered till April-2017: 1,276.00 Exempted: 1149.01 Recoverable: 448.94

Gross Pay (Rs.): 44,491.00 Deductions: (Rs.): -4,831.00 Net Pay: (Rs.): 39,660.00

Payee Name: ABDUL HAYE

Account Number: 00545001

Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: abdulhaye9@gmail.com

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** All amounts are in Pak Rupees*

** Errors & omissions excepted*

Pay Slip 6/2011

[illegible]

[illegible] 001 Month June 20[illegible]
[illegible] -PRINCIPAL GOVERN[illegible]
Education Schools

[illegible]

[illegible]

[illegible] Regular / Contract	[illegible]
[illegible] Pay	7,[illegible]
[illegible] Rent Allowance	1,8[illegible]
[illegible] Rel (F-2[illegible] 01-16)	1,4[illegible]
[illegible] Medical Allow. [illegible] 16-2)	1,[illegible]
[illegible] Allowance [illegible]00 bo%	3,5[illegible]
Gro[illegible] Pay and Allowances	14,7[illegible]
DEDUCTIONS	
[illegible] 32 [illegible]	9[illegible]
[illegible] Insolvent Fund	2[illegible]
[illegible] Group Insurance	[illegible]
[illegible] Insurance	173.00
[illegible] Fund	[illegible].00
Total Deductions	1,4[illegible]
	13,3[illegible]

D.O.B [illegible] 1930
03 [illegible] 07 Months [illegible] Days
Gover[illegible] Contribution [illegible] LPF

LFP [illegible]
ALLIED BANK LIMITED SHADDADAR
0120[illegible]-0071[illegible]
947.00

(Annex-F)

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO. ED (PRC)-1-1/2011
Dated Peshawar the 14th July, 2011

From:

The Secretary to Govt. of Khyber Pakhtunkhwa,
Finance Department,
Peshawar.

To:

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa
2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa
3. The Secretary to Governor, Khyber Pakhtunkhwa
4. The Secretary to Chief Minister, Khyber Pakhtunkhwa
5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa
6. All Heads of Attached Departments in Khyber Pakhtunkhwa
7. All District Coordination Officers in Khyber Pakhtunkhwa
8. All Political Agents / District & Sessions Judges in Khyber Pakhtunkhwa
9. The Registrar, Peshawar High Court, Peshawar.
10. The Chairman, Public Service Commission, Khyber Pakhtunkhwa
11. The Chairman, Services Tribunal, Khyber Pakhtunkhwa.

Subject: REVISION OF BASIC PAY SCALES, ALLOWANCES AND PENSION OF CIVIL SERVANTS OF THE PROVINCIAL GOVERNMENT.

Dear Sir,

The Governor, Khyber Pakhtunkhwa Province has been pleased to sanction *w.e.f. 01-07-2011* and until further orders, revision of Basic Pay Scales, Allowances and Pension for the Civil Servants of the Provincial Government, detailed as follows:-

PART-I (PAY)

2. Revision of Basic Pay Scales:-

Basic Pay Scales – 2011, as contained in the Annexure to this letter, will replace Basic Pay Scales – 2008, *with effect from 01-07-2011*.

3. Fixation of Pay of the Existing Employees (w.e.f 01-07-2011):-

i. Basic pay of an employee, who was in service on 30-06-2011, will be fixed in Basic Pay Scale – 2011 on point-to-point basis i.e. at the stage corresponding to that occupied by him / her above the minimum of Basic Pay Scales – 2008

ii. In case of Personal Pay being drawn by an employee as part of his / her basic pay beyond the maximum of his / her pay scale as on 30-06-2011, he / she shall continue to draw such pay in the Basic Pay Scales – 2011 *at revised rates*.

4. Annual Increment:-

Annual increment will continue to be admissible, subject to the existing conditions, on 1st of December each year.

abroad.

e) will be admissible during the period of suspension.

8 **Medical Allowance:-**

i Medical Allowance admissible to Civil Servants in BPS-16 to BPS-22 @ 15% of the basic pay, as admissible to them on 30-06-2011, *in Basic Pay Scales – 2008*, will continue to be admissible but will remain frozen at the level of its admissibility as on *30-06-2011*.

ii With effect from 01-07-2011 and onwards all new entrants in civil service in BPS-16 to BPS-22 will also be allowed Medical Allowance @ 15% of the *minimum of relevant Basic Pay Scales – 2008 on notional basis*, the amount of which will remain frozen at the same level until further orders.

9. **Special Pays and Allowances:-**

All Special Pays, Special Allowances or Allowances admissible as percentage of pay (*excluding those which are capped by maximum limits*), including House Rent Allowance, Risk Allowance, Judicial Allowance, Incentive Allowance and Allowance/Special Allowances equal to one month Basic Pay/ one-and-half of the initial pay, granted to Provincial Government employees, irrespective of his/her posting in any Department, including civil employees in BPS 1-22 of Judiciary, will *stand frozen at the level of its admissibility as on 30-06-2011*.

10 **Conveyance Allowance:-**

i Conveyance Allowance will be admissible to all civil servants in BPS-1 to 15 on revised rates as under:-

BPS	Existing	Revised (Rs. P.M.)
BPS 1-4	Rs.680/- p.m.	Rs.850/- p.m.
BPS 5-10	Rs.920/- p.m.	Rs.1150/- p.m.
BPS 11-15	Rs.1360/- p.m.	Rs.1700/- p.m.

ii. All Civil Servants of the Provincial Government (excluding those who are allowed monetized value of Transport or who avail Transport Facility) will be allowed Conveyance Allowance at the prescribed rates **irrespective of their place / station of duty**.

11. **Miscellaneous Allowances.-**

Following Allowances will be admissible at revised rates, as noted against each:-

S. No.	Name of Allowance	Existing Rates	Revised Rates
i.	Integrated Allowance for N/Qasid, Qasid & Daftaris	Rs 150/- p.m.	Rs. 300/- p.m
ii.	Washing Allowance for Farash, Chowkidar, Sweeper, Sweepress, Dispatch Rider, Mechanic, Cleaner, Driver, Mali, Behishti, Head Mali, Sweeper Jamadar	Rs.30/- p.m.	Rs.100/- p.m
iii.	Dress Allowance for Farash, Chowkidar, Sweeper, Sweepress, Dispatch Rider, Mechanic, Cleaner, Mali, Behishti, Head Mali Sweeper Jamadar	Rs.25/- p.m. Rs.35. p.m. Rs.40/- p.m.	Rs.100/- p.m
iv	Uniform Allowance for Nurses	Rs.300/- p.m.	R 600/- p.m

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD (PRC) 1-1/2015
Dated Peshawar the 27th July, 2015

To:

1. All Administrative Secretaries to Govt: of Khyber Pakhtunkhwa
2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa
3. The Principle Secretary to Governor Khyber Pakhtunkhwa
4. The Principle Secretary to Chief Minister, Khyber Pakhtunkhwa
5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa
6. All Heads of Attached Departments in Khyber Pakhtunkhwa
7. All Deputy Commissioners, in Khyber Pakhtunkhwa
8. All Political Agents / District & Sessions Judges in Khyber Pakhtunkhwa
9. The Registrar, Peshawar High Court, Peshawar
10. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
11. The Chairman Services Tribunal, Khyber Pakhtunkhwa

Subject: REVISION OF BASIC PAY SCALES & ALLOWANCES OF CIVIL SERVANTS OF THE PROVINCIAL GOVERNMENT (2015)

Dear Sir,

The Competent Authority has been pleased to sanction the revision of Basic Pay Scales & Allowances w.e.f **1st July, 2015** for the Civil Servants of the Provincial Government, detailed in the following paragraphs:-

Part-I (Pay)

2 **Revision of Basic Pay Scales:-**

The Basic Pay Scales – 2015 shall replace the Basic Pay Scales 2011 with effect from 01-07-2015 as contained in the Annexure to this circular letter.

3. **Fixation of Pay of the existing employees:-**

i) The basic pay of an employee in service on 30-06-2015 shall be fixed in the Basic Pay Scales – 2015 on point to point basis i.e. at the stage corresponding to that occupied by him / her above the minimum of Basic Pay Scales – 2011;

ii) In case of Personal Pay being drawn by an employee as part of his / her basic pay beyond the maximum of his / her pay scale on 30-06-2015 he / she shall continue to draw such pay in the Basic Pay Scales – 2015 at the revised rates

Contd.....P/2

8. **Ad-hoc Relief Allowance-2015:**

i) An Ad-hoc Relief Allowance-2015 @ 10% of the running basic pay of Basic Pay Scales – 2015 to the civil employees of the Provincial Government including contingent paid staff and contract employees employed against civil posts in Basic Pay Scales on standard terms and conditions of contract appointment shall be allowed w e f 01-07-2015 till further orders;

ii) The Ad-hoc Relief Allowance will be subject to Income Tax.

iii) The Ad-hoc Relief Allowance will be admissible during leave and entire period of LPR except during extra ordinary leave

iv) The Ad-hoc Relief Allowance will not be treated as part of emoluments for the purpose of calculation of Pension/Gratuity and recovery of House Rent;

v) The Ad-hoc Relief Allowance will not be admissible to the employees during the tenure of their posting / deputation abroad

vi) The Ad-hoc Relief Allowance will be admissible to the employees on their repatriation from posting/deputation abroad at the rate and amount which would have been admissible to them, had they not been posted abroad;

vii) The Ad-hoc Relief Allowance will be admissible during the period of suspension;

vii) The term "Basic Pay" will also include the amount of personal Pay granted on account of annual increment(s) beyond the maximum of the existing pay scales

9. **Medical Allowance:**

(i) The competent authority has further been pleased to sanction increase in the amount of Medical Allowance @ 25% of the existing amount being admissible / drawn on 30-06-2015

(ii) All the new entrants in BPS-16 to BPS-22 shall be allowed medical Allowance @ 15% of the minimum of relevant Basic Pay Scales-2008 on notional basis plus 25% of the amount of Medical Allowance, so calculated, w.e f 01-07-2015 till further orders, and shall stand frozen at the same level

Contd. P/4

BEFORE THE SERVICE TRIBUNAL K.P.K. PESHAWAR

Service Appeal No._____/2017

Abdul Haye.....Appellant

Versus

Government & Others.....Respondents

APPLICATION FOR THE GRANT OF ORDER OF AMENDMENT

Respectfully Sheweth:

The Petitioner most humbly submits as under:

1. That the above captioned case is pending adjudication before this Hon'ble Tribunal, in which today is fixed as date of hearing.
2. That at the time of filing of appeal some clerical mistakes has been made inadvertently which needs correction, hence, this application.
3. That there is no legal embargo in allowing this application.

It is, therefore, most humbly prayed that by accepting the instant petition, an order of amendment may kindly be passed.

Petitioner
Through

Dated: 03.04.2018

Asif Ali Shah,
Advocate, High Court,
Peshawar.

BEFORE THE SERVICE TRIBUNAL K.P.K. PESHAWAR

Service Appeal No._____/2017

Abdul Haye, (SST)
Government Higher Secondary School, Shabqadar Fort, Charsadda..
.....Appellant

Versus

1. **Government of KPK**, through, Secretary Finance, KPK, Peshawar.
2. Accountant General, KPK, Peshawar.
3. Director, Elementary & Secondary Education, K.P.K., Peshawar.
4. District Education Officer (male, Charsadda.
5. District Account Officer, Charsadda.

Amended Service Appeal:

SERVICE APPEAL UNDER SECTION-4 OF THE CIVIL SERVANT ACT, 1974 AGAINST THE ACT OF THE RESPONDENT WHO STOPPED THE SALARY OF THE APPELLANT

Prayer in Appeal:

ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED:

I. **TO GRANT SPECIAL COMPENSATORY ALLOWANCE FROM DECEMBER 2015 INSTEAD OF JULY 2015;**

II. **PRE-MATURE INCREMENT FROM DECEMBER 2015; ALONG WITH ARREARS TILL DATE AND**

III. **MEDICAL ALLOWANCE @ RS. 1875/-.+** And ARREARS w.e.f. 1-7-2015

Respectfully Sheweth!

The appellant humbly submits as under:-

1. That the appellant is serving as SST and performing his duties to the satisfaction of his superiors.

2. That respondent No.1 issued a notification regarding special compensatory allowance and the appellant being entitled and deserving for the same, opted for the same allowance through written request.
{Copies of notification & application are attached as Annexure-A&B}

3. That the appellant was receiving less medical allowance of his grade and scale that's why the appellant filed so may application / representations and thereafter, the competent Authority was pleased to correct the medical allowance @ Rs. 1875.
{Copy of salary slip is attached as Annexure-C}

4. That it is utter to shock that the respondents with out any reasons again reduced the medical allowance of the appellant to Rs.1500/- and respondents also failed to grant him one premature increment, the appellant sent so may departmental applications / representation but no positive response. **{Copy of salary slip is attached as Annexure-D}**

5. That the appellant again submitted a written application to Respondent No.1 with a request to grant **TO GRANT SPECIAL COMPENSATORY ALLOWANCE FROM DECEMBER 2015 INSTEAD OF JULY 2015; PRE-MATURE INCREMENT FROM DECEMBER 2015; ALONG WITH ARREARS TILL DATE AND MEDICAL ALLOWANCE @ RS. 1875/-.** with arrears but of no avail and no response till the expiry of statutory period.
{Copy of application is attached as Annexure-E}

10. That the appellant was aggrieved from these acts of the Respondents preferred the instant appeal to this Hon'ble Tribunal for the redressal on the grounds inter-alia:-

GROUNDS:

A. That the appellant is victimized by the orders passed by the competent authority and such practice adversely effects efficiency of incumbents and also reduces their confidence and faith in public.

B. That the appellant has excellent service record and his moral character was too excellent, hence the Respondent have no right to do great discrimination with the appellant.

C. That the appellant is very hardworking and punctual in his duty, therefore, no complaint received by the Respondents against the appellant but the Respondent unlawfully interfered in the medical allowance of the appellant, and not granting premature increment which is against the law and fundamental rights of the appellant.

D. That the appellant was condemned unheard, his departmental appeal was not properly adjudicated and the silence of the department on the said appeal shows the malafide of the Respondents, hence needs interference of this Hon'ble Court.

E. That this conduct of the Respondent has not only enhanced the agonies of the Appellant, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on the part of the Respondent which needs to be judicially handled and curbed, inorder to save the poor masses and provide them an opportunity to lead their lives freely and with the enjoyment of all of their fundamental rights, which are provided for them in the Constitution of Islamic Republic of Pakistan 1973.

F. That the Respondent erroneously exercised their discretion against judicial principle passed the impugned orders of reduction of medical allowance, not awarding compensatory allowance and one premature increment , by this way they have opened a new pandora box in clear violation of Service law.

IT IS, THEREFORE, MOST RESPECTFULLY PRAYED THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED:

I. TO GRANT SPECIAL COMPENSATORY ALLOWANCE FROM DECEMBER 2015 INSTEAD OF JULY 2015;

II. PRE-MATURE INCREMENT FROM DECEMBER 2015; ALONG WITH ARREARS TILL DATE AND

III. MEDICAL ALLOWANCE @ RS. 1875/-.

Appellant

Through:

ASIF ALI SHAH
&
Bilal Khan Khalil
Advocate, Peshawar

Dated: 03.04.2018

VERIFICATION:

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate

Note: That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Advocate

BEFORE THE SERVICE TRIBUNAL K.P.K. PESHAWAR

Service Appeal No.160/2018

Abdul Haye, (SST)

.....Appellant

Versus

Government of KPK, & others

.....Respondents

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth:

The appellant most humbly submits his rejoinder as under:

Reply to Preliminary Objections:

All the preliminary objections raised by the Respondents in their written para wise comments are wrong, incorrect and baseless, hence expressly denied.
The appellant has got locus standi / cause of action against the respondents. The appellant contacted this Hon'ble Court with clean hands and bona fide intention for redressal of his grievances. The appeal of the Appellant is based on cogent and reliable grounds. The appeal is self explanatory and all the facts of the case favour the stance of the appellant.

Reply to factual Objections:

1. Para No.1 needs no reply.

2. Para No.2 of the comments is wrong, incorrect, false and against the facts. The respondents misguiding this Hon'ble court by mis quoting & mis-interpreting the notification regarding special compensatory allowance and the appellant being entitled and deserving for the same, opted for the same allowance through written request.

3. Para No. 3 of the comments is wrong, incorrect, false and against the facts. The respondents misguiding this Hon'ble court by mis guiding this Hon'ble Tribunal and keeping concealed this fact & reality that the appellant was receiving less medical allowance of his grade and scale that's why the appellant filed so may application / representations and thereafter, the competent Authority was pleased to correct the medical allowance @ Rs. 1875.

4. Para No.4 of the written comments is incorrect. Infact it is utter to shock that the respondents with out any reasons again reduced the medical allowance of the appellant to Rs.1500/- and respondents also failed to grant him one premature increment, the appellant sent so may departmental applications / representation but no positive response.

5. Para No. 5 of written comments needs no comments.

6. That the appellant was aggrieved from these acts of the Respondents preferred the instant appeal to this Hon'ble Tribunal for the redressal on the grounds inter-alia:-

Reply to grounds:

A. Grounds A & B of the appeal is correct and reply is submitted by the respondent is wrong, incorrect and against the reality. The replying respondent is misguiding the court on different issues which is not involved in the appellant case, hence expressly denied.
B. Reply to Ground-C is wrong and misguiding the cases referred in para is not similar to the appellant case.
C. Ground-D & E of the appeal are correct and reply is given in the above paras in detail.
D. Grounds F&G of the appeal are correct. Reply filed by the respondent to these grounds are wrong and incorrect the detail reply is given in the above paras.

IT IS, THEREFORE, MOST HUMBLY PRAYED THAT ON THE ACCEPTANCE OF THE REJOINDER, THIS HON'BLE COURT MAY VERY GRACIOUSLY ALLOWED THE APPEAL IN FAVOUR OF THE APPELLANT AND AGAINST THE RESPONDENTS, AND THE RESPONDENTS MAY KINDLY BE DIRECTED:

I. TO GRANT SPECIAL COMPENSATORY ALLOWANCE FROM DECEMBER 2015 INSTEAD OF JULY 2015;
II. PRE-MATURE INCREMENT FROM DECEMBER 2015; ALONG WITH ARREARS TILL DATE AND
III. MEDICAL ALLOWANCE @ RS. 1875/-.

Appellant
Through:

ASIF ALI SHAH
&
Bilal Khan Khalil
Advocate, Peshawar

Dated: 15.03.2019

VERIFICATION:
It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (June-2019)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:

Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 11 Years 07 Months 001 Days

Employment Category: Vocational Temporary

Designation: SECONDARY SCHOOL TEACHER 80001086-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: V.25CP.P.91 Interest Applied: Yes GPF Balance: 98,637.00

Vendor Number:

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 3

Wage type		Amount	Wage type		Amount
0001	Basic Pay	37,270.00	1000	House Rent Allowance	4,433.00
1947	Medical Allow 15% (16-22)	1,500.00	2148	15% Adhoc Relief All-2013	740.00
2199	Adhoc Relief Allow @10%	504.00	2211	Adhoc Relief All 2016 10%	2,612.00
2224	Adhoc Relief All 2017 10%	3,727.00	2247	Adhoc Relief All 2018 10%	3,727.00
5011	Adj Conveyance Allowance	5,000.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3017	GPF Subscription - Rs4270	-4,270.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-50.00	3990	Emp.Edu. Fund KPK	-250.00
4004	R. Benefits & Death Comp:	-900.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	207,000.00	-5,750.00	189,750.00

Deductions - Income Tax

Payable: 1,000.00 Recovered till JUN-2019: 600.00 Exempted: 400.00 Recoverable: 0.00

Gross Pay (Rs.): 59,513.00 Deductions: (Rs.): -12,020.00 Net Pay: (Rs.): 47,493.00

Payee Name: ABDUL HAYE

Account Number: 00545001

Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: abdulhaye9@gmail.com

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** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Sheet no. 1

Charsadda

S#:1

P Sec:001 Month:June 2016
CA6151 -HEAD MASTER GHS MARZAI CHR
HEAD MASTER GOVT HIGH SCH

Pers #: 00437380 Buckle:
Name: KHYAL MOHAMMAD
SENIOR ENGLISH TEACHER
CNIC No 1710103518427
GPF Interest Applied
16 Vocational Temporary

NTN:
GPF #:
Old #:

CA6151 -

PAYS AND ALLOWANCES:	
0001-Basic Pay	20.155,00
1000-House Rent Allowance	1.818,00
1554-Spl. Comp. Allowance	2.853,00
1947-Medical Allow 15% (16-22)	1.876,00
1948-Adhoc Allowance 2010@ 50%	3.500,00
2148-15% Adhoc Relief All-2013	2.220,00
2174-Adhoc Relief Allow-2014	1.480,00
2199-Adhoc Relief Allow @10%	2.015,00
Gross Pay and Allowances	35.917,00
DEDUCTIONS:	
IT Payable 341,11 Deducted 32,00 TAX:(3609)	32,00
GPF Balance 87.246,00 Subrc:	2.275,00
3501-Benevolent Fund	250,00
3511-Addl Group Insurance	19,00
3604-Group Insurance	173,00
3990-Emp Edu. Fund KPK	125,00
Total Deductions	2.874,00
	33.043,00

D.O.B 08.09.1979
07 Years 07 Months 007 Days

LFP Quota:
ALLIED BANK LIMITED SHABQADAR
01-206-00739

Charsadda

S#:1

P Sec:001 Month:June 2019

CA6066 -PRINCIPAL GOVERNMENT HIGHE

PRINCIPAL GOVT HIGHER SEC

Pers #: 00376478 Buckle:

Name: ABDUL WADOOD

SECONDARY SCHOOL TEACHER

CNIC No.1710103026411

GPF Interest Applied

17 Vocational Temporary

NTN:

GPF #:

Old #:

CA6066 -

PAYS AND ALLOWANCES:

0001-Basic Pay	37,270.00
1000-House Rent Allowance	4,433.00
1210-Convey Allowance 2005	5,000.00
1554-Spl. Comp. Allowance	2,697.00
1947-Medical Allow 15% (16-22)	1,875.00
~~2148-15% Adhoc Relief All-2013~~	740.00
2199-Adhoc Relief Allow @10%	504.00
2211-Adhoc Relief All 2016 10%	2,612.00
2224-Adhoc Relief All 2017 10%	3,727.00
Gross Pay and Allowances	62,585.00

DEDUCTIONS:

IT Payable	0.00	Deducted	600.00	TAX:(3609)	50.00
GPF Balance	292,426.00			Subrc:	4,270.00
3501-Benevolent Fund					800.00
3990-Emp.Edu. Fund KPK					250.00
4004-R. Benefits & Death Comp:					900.00

Total Deductions 6,270.00

56,315.00

D.O.B 23.03.1978

11 Years 08 Months 029 Days

LFP Quota:

THE BANK OF KHYBER I.B.Br. Shabqadar.

00668009

Sheet no. 1

Charsadda

S#:2

P Sec:001 Month:June 2019
CA6066 -PRINCIPAL GOVERNMENT HIGHE
PRINCIPAL GOVT HIGHER SEC

Pers #: 00376478 Buckle:
Name: ABDUL WADOOD
SECONDARY SCHOOL TEACHER
CNIC No.1710103026411
GPF Interest Applied
17 Vocational Temporary

NTN:
GPF #:
Old #:

CA6066 -

PAYS AND ALLOWANCES:

2247-Adhoc Relief All 2018 10%	3,727.00
Gross Pay and Allowances	62,585.00

DEDUCTIONS:

IT Payable	0.00	Deducted	600.00
GPF Balance	292,426.00		

Subrc:

Total Deductions	6,270.00
	56,315.00

D.O.B 23.03.1978
11 Years 08 Months 029 Days

LFP Quota:
THE BANK OF KHYBER I.B.Br. Shabqadar.
00668009

Dist. Govt. NWFP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (February-2019)

Personal Information of Mr ABDUL HAYE d/w/s of ABDUL KARIM

Personnel Number: 00389438 CNIC: 1710102625975 NTN:

Date of Birth: 14.04.1980 Entry into Govt. Service: 01.12.2007 Length of Service: 11 Years 03 Months 001 Days

Employment Category: Vocational Temporary

Designation: SENIOR ENGLISH TEACHER 80001086-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6066-PRINCIPAL GOVERNMENT HIGHER SECONDA SCHOOL SHABQADAR FORT CHARSADDA

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: Interest Applied: No **GPF Balance:** 274,097.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 16 Pay Stage: 10

Wage type		Amount	Wage type		Amount
0001	Basic Pay	34,110.00	1000	House Rent Allowance	2,727.00
1210	Convey Allowance 2005	5,000.00	1554	Spl. Comp. Allowance	2,697.00
1947	Medical Allow 15% (16-22)	1,500.00	2148	15% Adhoc Relief All-2013	740.00
2199	Adhoc Relief Allow @10%	504.00	2211	Adhoc Relief All 2016 10%	2,612.00
2224	Adhoc Relief All 2017 10%	3,411.00	2247	Adhoc Relief All 2018 10%	3,411.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs3340	-3,340.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-50.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-1,089.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 1,000.00 Recovered till FEB-2019: 400.00 Exempted: 400.00 Recoverable: 200.00

Gross Pay (Rs.): 56,712.00 Deductions: (Rs.): -5,429.00 Net Pay: (Rs.): 51,283.00

Payee Name: ABDUL HAYE
Account Number: 00545001
Bank Details: THE BANK OF KHYBER, 080145 I.B.Br. Shabqadar. I.B.Br. Shabqadar., Charsadda

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
City: X Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address:
City: Email: abdulhaye9@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SERVICES/27.02.2019/16:31:33/v1.1)
** All amounts are in Pak Rupees*
** Errors & omissions excepted*

Charsadda

S#:10

P Sec:001 Month:July 2019
CA6066 -PRINCIPAL GOVERNMENT HIGHE
PRINCIPAL GOVT HIGHER SEC

Pers #: 00389438 Buckle:
Name: ABDUL HAYE
SECONDARY SCHOOL TEACHER
CNIC No.1710102625975
GPF Interest Applied
17 Vocational Temporary

NTN:
GPF #: V.25CP.P.91
Old #:

CA6066 -

PAYS AND ALLOWANCES:

0001-Basic Pay	37,270.00
1000-House Rent Allowance	4,433.00
1210-Convey Allowance 2005	5,000.00
1947-Medical Allow 15% (16-22)	1,500.00
2148-15% Adhoc Relief All 2013	740.00
2199-Adhoc Relief Allow @10%	504.00
2211-Adhoc Relief All 2016 10%	2,612.00
2224-Adhoc Relief All 2017 10%	3,727.00
2247-Adhoc Relief All 2018 10%	3,727.00
Gross Pay and Allowances	61,376.00

DEDUCTIONS:

IT Payable	3,754.19	Deducted	342.00	TAX:(3609)	342.00
GPF Balance	108,657.00			Subrc:	4,270.00
6505-GPF Loan Principal Instal		Bal:	184,000.00		5,750.00
3501-Benevolent Fund					800.00
3990-Emp.Edu. Fund KPK					250.00
4004-R. Benefits & Death Comp:					900.00

Total Deductions 12,312.00

49,064.00

D.O.B 14.04.1980
11 Years 08 Months 001 Days

LFP Quota:
THE BANK OF KHYBER I.B.Br. Shabqadar.
00545001

Charsadda

S#:11

P Sec:001 Month:July 2019
CA6066 -PRINCIPAL GOVERNMENT HIGHE
PRINCIPAL GOVT HIGHER SEC

Pers #: 00389438 Buckle:
Name: ABDUL HAYE
SECONDARY SCHOOL TEACHER
CNIC No.1710102625975
GPF Interest Applied
17 Vocational Temporary

NTN:
GPF #: V.25CP.P.91
Old #:

CA6066 -

PAYS AND ALLOWANCES:

2265-Adhoc Relief All 2019 05%	1,863.00
Gross Pay and Allowances	61,376.00

DEDUCTIONS:

IT Payable	3,754.19	Deducted	342.00	
GPF Balance	108,657.00			Subrc:

Total Deductions	12,312.00
	49,064.00

D.O.B 14.04.1980
11 Years 08 Months 001 Days

LFP Quota:
THE BANK OF KHYBER I.B.Br. Shabqadar.
00545001

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