

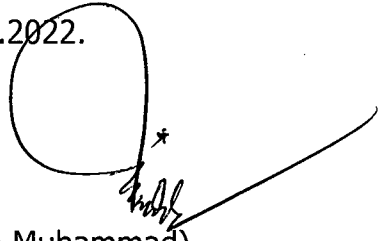
01.09.2022

Mr. Fazal Shah Mohmand, Advocate for the appellant present.

Preliminary arguments heard.


Learned counsel for the appellant contended that the appellant is holding the post of PST (BS-12) and is aggrieved of the revised entry made in his Service Book as a result of which an amount of Rs 4000/- per month is deducted from his salary. When attention of the learned counsel for appellant was invited towards entry made in the Service Book to the effect of incorrect up-gradation of the post from BS-5 to BS-12 which does not mention any date and the issue of limitation would hit the service appeal, learned counsel for the appellant relied on various judgements of the Apex Court to the fact that being a financial and recurring cause no limitation runs against in such cases/orders. The same has therefore, been impugned in the instant service appeal and departmental appeal submitted to respondent No. 2 on 27.12.2021 was not decided within the statutory period. Whereafter the instant service appeal has been filed in the Service Tribunal on 22.04.2022.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 11.10.2022.

  
(Mian Muhammad)  
Member (E)

14.07.2022

Junior of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 01.09.2022 before S.B.




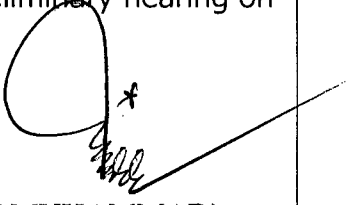
(MIAN MUHAMMAD)  
MEMBER (E)

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 609/2022 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/04/2022	<p>The appeal of Mr. Nader Ali presented today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	25.04.2022	<p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant seeks time to further prepare the brief. Granted. To come up for preliminary hearing on 14.07.2022 before D.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER(E)</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No 1009 /2022

Nadar Ali Khan.....**Appellant**

**V E R S U S**

DEO and others.....**Respondents**

**I N D E X**

S.No	Description of Documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-3
2.	Application for interim relief with Affidavit		4
3.	Copy of extract from Service Book, Corrigendum dated 13-11-1988, Intermediate Certificate & PTC Certificate	A, B, C & D	5-12
4.	Copies of Notifications dated 26-06-2012, Notification dated 11-07-2012 & Extract from Service Book	E, F & G	13-17
5.	Copy of Bank Statement, Pay Slips & Extract from the Service Book	H & I	18-26
6.	Copy of Departmental appeal with Acknowledgment Due	J	27-28
11.	Vakalat Nama		29

**Dated:-13-04-2022**

**Through**

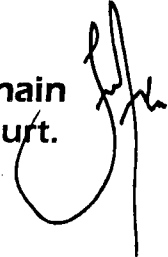
**Appellant**



**Fazal Shah Mohmand  
Advocate,  
Supreme Court of Pakistan**

&

**Abdul Samad Hasnain  
Advocate High Court.**



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No \_\_\_\_\_ /2022

Nadir Ali Khan son of Sardar Ali Khan,  
Primary School Teacher, Government Primary School, Spalmay, Tarnab,  
Tehsil & District Charsadda.

..... Appellant

V E R S U S

1. District Education Officer (Male), Charsadda,
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Elementary & Secondary Education, Government of Khyber Pakhtunkhwa

..... Respondents

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE REVISED ENTRY IN THE SERVICE  
BOOK OFF THE APPELLANT HAS BEEN DOWN GRADED FROM BPS-  
12 TO BPS-07 AND AGAINST WHICH DEPARTMENT APPEAL OF THE  
APPELLANT DATED 29-12-2021 HAS BEEN RESPONDED SO FAR  
DISPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD  
OF NINETY DAYS.**

**PRAYER:-**

On acceptance of this appeal the impugned revised entry in the service book of the appellant dated Nil whereby the appellant has been downgraded from BPS-12 to BPS-07 may kindly be set-aside thereby restoring the appellant to his previous position of BPS-12 and declaring the impugned recovery of Rs. 2,12,638/- as illegal and unlawful

**Respectfully Submitted:-**

1. That the appellant was appointed as Elementary Teacher in BPS-05 on 16-01-1988 and the appellant passed his TC examination on 23-05-1995 and intermediate examination on 06-09-2013 and since appointment has performed his duties with honesty and full devotion and to entire satisfaction of his high ups. **(Copy of extract from Service Book, Corrigendum dated 13-11-1988, Intermediate Certificate & PTC Certificate are enclosed as Annexure A, B, C & D).**
2. That since appointment the appellant is serving in Primary School performing the duties of Primary School Teacher (herein after referred to as PST) and after being qualified his Intermediate examination coupled with PTC, the appellant was entitled to the post of Primary School Teacher (BPS-12) in pursuance of KP. Government decision.
3. That primary School Teachers were serving in various Pay Scales and vide Notification dated 26-06-2012 & notification dated 11-07-2012,

2012, all the PST,s serving in various Pay Scales were upgraded to BPS-12 w.e.f 01-07-2012, as such the appellant was also awarded PST (BPS-12) which was duly entered in the Service Book of the appellant. **(Copies of Notifications dated 26-06-2012, Notification dated 11-07-2012 & Extract from Service Book is enclosed as Annexure E, F & G).**

4. That the appellant regularly received the salaries of PBS-12 however, strangely and to the utter surprise of the appellant, full salary of the appellant was not paid to him since April 2021 as evident from the Bank Statement and Revised entry was recorded in the Service Book of the appellant dated Nil whereby the appellant was downgraded from BPS-12 to BPS-07 and recovery of Rs. 2,12,638/- was ordered from the appellant @ Rs. 4000/- per month w.e.f April 2021. the appellant time and again approached respondents for the grant of BPS-12 to him but to no avail. **(Copy of Bank Statement, Pay Slips & Extract from the Service Book is enclosed as Annexure H & I).**
5. That the appellant filed departmental appeal on 29/12 /-2021 which has not been responded despite the lapse of more than the statutory period of ninety days. **(Copy of Departmental appeal with Acknowledgment Due is enclosed as Annexure J).**
6. That the impugned entry recorded in the Service Book of the appellant dated Nil whereby the appellant has been downgraded from BPS-12 to BPS-7 is against the law, facts and principles of justice on grounds inter-alia as follows:-

**GROUND:-**

- A. That the impugned revised entry dated Nil with subsequent recovery entry is illegal void ab-initio.
- B. That the appellant has not treated in accordance with law in violation of Articles 4, 10 and 25 of the Constitution and law of the land being his fundamental right.
- C. That the appellant was upgraded to BPS-12 by the respondents after the notification of the provincial Govt. and there is no omission or commission on his part.
- D. That the appellant did nothing that amounts to misconduct as she duly performed his duties during the said period as PST.
- E. That the appellant regularly performed his duties and the salaries were paid to him in lieu of duties which cannot be recovered.
- F. That the appellant is performing his duties as Primary School Teacher since the year 2012 to which he was upgraded in pursuance of the Notifications of the Provincial Govt. referred to above, thus the impugned revise entry is not tenable in the eyes of law.

- G. That Ex-parte action has been taken against the appellant and he has been condemned unheard in violation of the principles of natural justice.
- H. That no Charge Sheet & Show Cause Notice was communicated to the appellant before recording the impugned entry.
- I. That no inquiry has been conducted in the matter and thus the impugned entry is in total disregard of the law on the subject.
- J. That the appellant was not afforded opportunity of personal hearing.
- K. That the appellant has about 34 years of service with unblemished service record at his credit with no complaint during entire service career.
- L. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

**It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.**

**Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.**

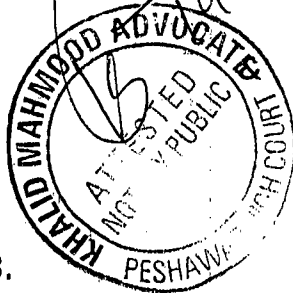
**Dated:-13-04-2022**

**Through**

**Appellant**

**Fazal Shah Mohmand**  
Advocate,  
Supreme Court of Pakistan

**Abdul Samad Hasnain**  
Advocate High Court.



**LIST OF BOOKS**

1. Constitution 1973.
2. other books as per need

**CERTIFICATE:**

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

**ADVOCATE**

**AFFIDAVIT**

I, Nadar Ali Khan, Primary School Teacher, Govt. Primary School Govt. Primary School, Spalmay, Tarnab, Tehsil & District Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

**DEPONENT**

*Nadar Ali Khan*

-4-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No \_\_\_\_\_/2022

Nadar Ali Khan.....Appellant

**V E R S U S**

DEO and others.....Respondents

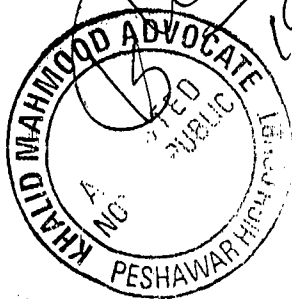
**Application for restraining respondents from effecting recovery from the appellant till the final disposal of titled case.**

**Respectfully Submitted:-**

1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
2. That the grounds of appeal may be considered as integral part of this application
3. That the appellant has got good prima facie case in his favor and is sanguine of its success.
4. That the balance of convenience is also in his favor and if respondents are not restrained from effecting recovery the appellant would suffer irreparable loss.

**It is therefore prayed that on acceptance of this application, respondents may kindly be restrained from effecting recovery from the appellant till the final disposal of titled appeal.**

**Dated:-13-04-2022**



Appellant

*[Signature]*  
**Fazal Shah Mohmand**  
Advocate,  
Supreme Court of Pakistan

&

*[Signature]*  
**Abdul Samad Hasnain**  
Advocate High Court.

**AFFIDAVIT**

I, Nadar Ali Khan, Primary School Teacher, Govt. Primary School Govt. Primary School, Spalmay, Tarnab, Tehsil & District Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Application**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

DEPONENT

*[Signature]*



Handwritten notes in Urdu and English, including "ASD" and "(Chowdhary)".

# SERVICE BOOK

.5- "A"

عنايت الله  
(M) 5050  
چارلس

OF

MR. Nadir Ali S/o Sardar Ali

نادر علی ولد سردار علی خاں

ڈیپٹی ایجوکیشنل آفیسر سکول قرناپ (پہلی) ضلع جالندھر

GS&PD, NWFP. - 1395 P. B. 50,000 B. - 3-5-87 - (25).

Price Rs. 4.50

①

(For use in Police Department only).

-6-

Heirs,

- 1.
- 2.
- 3.


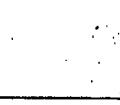
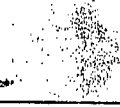
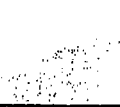
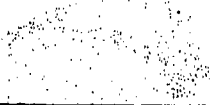
Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

Left thumb-impression.

Qualification	Date	Qualifications	Date
Passed the FA Examination from BISE Peshawar in the session (A) 2013 English		Passed S.S.C Exam 1987 First Arts B-1-S-E Peshawar under 52727 marks obtained 309 (G.E.)	
Under R/o 112949 obtained 561/1000 marks Pashtu result declared on 6/19/2013		B. L. or B. A. <i>university</i>	
Verification No. 4696 dt. 29/8/2016 Urdu		Pleadership examination	
Plan-drawing	S.D.E.O. Charsadda	Training School Final examination	
Finger print		Other qualifications - Passed the P.T.C Examination from Bureau of Curriculum Extension wing Sindh Jamshu in the session 1991-92 vide Govt. Elementary College of E (M) Basamabad, Karachi Seat No. 10077 obtained 787/1200 marks. Result announce on 23-8-1995	
Drill instructing			
Court duties			
Reserve duties			

N. B.—Line to be drawn under the qualification possessed

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name *Nadir Ali*
2. Race *Afghan* -7-
3. Residence *village & P.O. Cheena Teh Charsadda  
Distt. Peshawar*
4. Father's name and residence *Sardar Ali Khan*
5. Date of birth by Christian era as nearly as can be ascertained *12-4-1967  
Twelfth April N.H. 8 Sixty Seven*
6. Exact height by measurement *5-6*
7. Personal marks for identification *star on left side cheek*
8. Left hand thumb and Finger impression of (non-gazetted) officer
- |                |   |             |   |
|----------------|---|-------------|---|
| Little Finger. |  | Ring Finger |  |
| Middle Finger. |  | Fore Finger |  |
| Thumb.         |  |             |   |
9. Signature of Government servant. *نادر علی*
10. Signature and designation of the Head of the Office, or other Attesting Officer. *[Signature]*  
*Sd/- [Name]*  
*[Designation]*

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	if officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
Elementary teacher		BPS No 5	Rs 700	-	-	25-12-00	
Elementary School Teacher	Perm	Rs	700/-	P.M.		16/88	[Signature]
do	do	Rs	725/-	P.M.		1/88	[Signature]
do	do	Rs	750/-	P.M.		1/89	[Signature]
do	do	Rs	775/-	P.M.		1/90	[Signature]
do	do	BPS, No: 5	Rs: 1035-	49-1770	✓	1-6-91	[Signature]
do	do	Rs	1182/-	1231/-	P.M.	1/91	[Signature]
do	do	Rs:	1280/-	P.M.	✓	1/91	[Signature]
do	do	Rs	1329/-	P.M.	✓	1/92	[Signature]
do	do	Rs	1378/-	P.M.	✓	1/93	[Signature]
do	do	Rs	1862/-	P.M.	✓	1/94	[Signature]
<p>Here certificate is cancelled by P.O. with date 22/11/01</p>		<p>Office of the Accountant General NW F.P. Peshawar. Pay fixed in the revised Pay Scales 1991 of Rs. 1035-49-1770 (B-5) ● Rs 1231/- P.M. E.F. 1-6-1991 with next increment on 1-12-1991 provided by a general order for the Accountant General Pay fixation by N.W.F.P. Peshawar.</p>					
do	do	BPS: 5-	Rs 1400	-	-	66-2390	[Signature]
do	do	Rs	1928/-	P.M.	✓	1/94	[Signature]
do	do	Rs	1994/-	P.M.	✓	1/94	[Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

CORRIGENDUM -

In continuation of this office Enst; NO: 4550-52/AEI/PTC/F.NO: 982 dated 20.6.1988.

Mr: Nadir Ali Elementary teacher appointed by ASDNO(M) Charsadda vide his Enst; NO: 512 dated 16.1.1988 and NO: 561-68 dated 2.4.1988 against vacant Elementary teacher in PPS- is hereby approved.

Necessary entry to his effect may please be made in his S/Book.

(SYED LAEEQ AHMAD SHAH)  
DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

Enst; NO: 229-93 / Dated 98 Peshawar the 13-11- / 1988.

Copy for information to the:-

- 1:- District Education Officer (Male) Charsadda.
- 2:- Sub-Divisional Education Officer (Male) Charsadda.
- 3:- Teacher concerned.

F. pazig:-  
SWB.

*Recd 13/11*  
DISTRICT EDUCATION OFFICER (MALE)  
PESHAWAR.

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION - 10 - "C"

S.No. PB  
4002100



Roll No: 112949

## PESHAWAR



### PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2013 HUMANITIES ( Part-II )

Nadar Ali Khan Son / Daughter of Sardar Ali Khan  
of CHARSADDA  
has secured the marks shown against each subject in the H S S C Examination held in the month of  
May 2013 as Private Student

Subjects	Marks	Marks Obtained						
		Part-I		Part-II		Total	Marks in Words	
		Theory	Pract	Theory	Pract			
English	200	38	--	43	--	81	Eighty-One	
Urdu	200	48	--	56	--	104	One Hundred Four	
Islamic Education	50	29	--	--	--	29	Twenty-Nine	
Pakistan Studies	50	--	--	22	--	22	Twenty-Two	
Civics	200	58	--	43	--	101	One Hundred One	
Islamic Studies	200	53	--	54	--	107	One Hundred Seven	
Pashto	200	64	--	53	--	117	One Hundred Seventeen	
<b>Total: 1100</b>		<b>Verified</b>				561-C		Five Hundred Sixty-One Only
Remarks :								

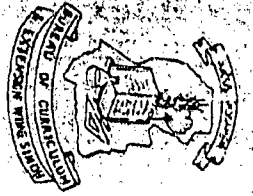
Secretary Officer  
Board of Intermediate and Secondary  
Education Peshawar

Reg. No 87983-B/PVT-2013  
Checked By : \_\_\_\_\_

Controller of Examinations

Date of Issue: 06-09-2013

Note: Error(s)/Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate



# BUREAU OF CURRICULUM & EXTENSION WING SINDH JAMSHORO

Book No: DEN

000297

Certificate

No: 129693

Certificate showing the number of Marks secured by Mr. Mashtir

A. primarily managed by

Religion

Islam

GOVERNMENT

Elementary College of Education (Men/Women)

PRIMARY TEACHERS' CERTIFICATE (Semester System) Annual Examination 19 91 held in the month

April of 19 95

-11- "D" A

100% X

SEAT No.	Max. Marks	Subject	Pass		Total Marks in Theory	PRACTICE OF TEACHING			GRAND TOTAL	PASS/FAIL	GRADE	REMARKS
			Int.	Ext.		Int.	D/E	Ext.				
	100	Principles of Edu. & Methods of Teaching										
	100	Child Development & Counselling/Guidance										
	100	School Organization & Classroom Management										
	100	Language & Methods of teaching, Sindhi/Urdu/English (M.T.)										
	100	Mathematics & Methods of Teaching										
	100	Science & Methods of Teaching										
	100/75	Social Studies & Methods of Teaching										
	100/75	Islamiat/Islamic History & Methods of Teaching										
	100/75	Art & Practical Art and Methods of Teaching										
	100/75	Health & Physical Education										
	100	English as an Additional language/Advanced English										
	1000	Total Marks in Theory										
	200	PRACTICE OF TEACHING										
	250	GRAND TOTAL										
		PASS/FAIL										
		GRADE										
		REMARKS										

Note: Passing the examination in Internal & External Evaluation separately is must.

Dated:

Abbreviations: Ex: External Evaluation

Int: Internal Evaluation

P/L: Practical Lessons

D/E: Discussion Lessons

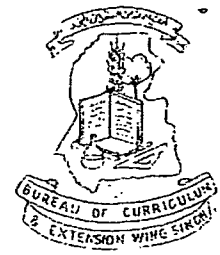
A/L: Annual Lessons

REGISTRAR  
DEPARTMENTAL EXAMINATIONS

GOVERNMENT OF SINDH  
BUREAU OF CURRICULUM AND EXTENSION WING SINDH  
JAMSHORO

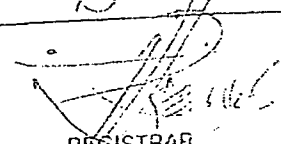
12

Certificate No. 5313



Certificate

This is to certify that Mr./Miss/Mrs. Nadvis Ali Khan  
S/o. D/o Sardar Ali Khan Surname \_\_\_\_\_  
Religion Islam As privately mentioned in the  
Govt. Mem College of Edu M Qasimabad Karachi  
has passed P.T.C. (Semester System/Alternate) Annual Examination 19 95  
held in the month of April 1991-92 under seat No. 10077  
He/She was placed in "B" Grade.

  
REGISTRAR  
DEPARTMENTAL EXAMINATIONS

  
DIRECTOR

DATED: \_\_\_\_\_



-13-

"E"

*[Handwritten mark]*

*[Handwritten signature]*  
27/6/2012

FINANCE DEPARTMENT  
(REGULATION WING)

NO. SO(FR)/FD/10-22(E)/2010  
Dated Peshawar, the 26-06-2012

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

Subject: GRANT OF INCENTIVE OF HIGHER PAY SCALE/GRADE ON THE BASIS OF TIME SCALE TO THE DIFFERENT CADERS OF TEACHERS IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.

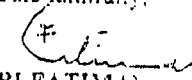
Dear Sir,  
I am directed to refer to your department letter No. SO (B & A)/1-184/SE/2008 dated 12.06.2012 on the subject noted above and to state that consequent upon the approval of the competent authority Finance Department, agrees to allow upgradation of the posts as per details given below w.e.f 01/07/2012.

Category/Nomenclature of the teaching posts	Basic Pay Scales	Revised nomenclature & Pay Scales	Promotion to Higher scale
Primary school teachers	BPS-3 BPS-4 BPS-7 BPS-9 BPS-10 BPS-12	PST (BS-12) & PST (BS-15)	20,500 posts of PST presently sanctioned in various pay scales will be upgraded in BPS-12 with effect from 01.07.2012. 26,000 posts of the existing posts of PST in various existing Pay Scales may be upgraded in BPS-14 and re-designated as Senior PST teachers. The posts may be filled in by promotion from amongst the holders of posts of PST with minimum 10 years-tenure service as such. 22,568 posts of the existing posts of PST (one post in each Primary School) may be upgraded to BPS-15 and re-designated as Primary School Head Teacher, to be promoted from amongst Senior PST teachers on merit with due regard to seniority.
M.A.T. / I.H.S / I. CT / Senior Teachers	BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	CT (BS-15) & SCT (BS-15)	All the existing posts of CT are to be upgraded in BPS-15, while 1/3 out of the total CT posts are to be upgraded to BPS-15 and to be re-designated as Senior CT, which will be filled through promotion from CT on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of CT as per service rules.
	BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	AT (BS-15) & SAT (BS-16)	All the existing posts of AT are to be upgraded in BPS-15, while 1/3 out of the total AT posts are to be upgraded to BPS-16 and to be re-designated as Senior AT, which will be filled through promotion from AT on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of AT as per service rules.

-14-

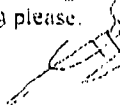
3. TT	BPS-07 BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	TT (BS-15) & STT (BS-16)	All the existing posts of TT are to be upgraded in BPS-15, while 1/3 out of the total TT posts are to be upgraded to BPS-16 and to be re-designated as Senior TT, which will be filled through promotion from TT on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of TT as per service rules.
4. DM	BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	DM (BS-15) & SDM (BS-16)	All the existing posts of DM are to be upgraded in BPS-15, while 1/3 out of the total DM posts are to be upgraded to BPS-16 and to be re-designated as Senior DM, which will be filled through promotion from DM on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of DM as per service rules.
5. PET	BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	PET (BS-15) & SPET (BS-16)	All the existing posts of PET are to be upgraded in BPS-15, while 1/3 out of the total PET posts are to be upgraded to BPS-16 and to be re-designated as Senior PET, which will be filled through promotion from PET on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of PET as per service rules.
6. Qari/Qaria	BPS-07 BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	Qari / Qaria (BS-12) & 5. Qari / S. Qaria (BS-15)	All the existing posts of Qari/Qaria are to be upgraded in BPS-12, while 1/3 out of the total Qari/Qaria posts are to be upgraded to BPS-15 and to be re-designated as Senior Qari/Qaria, which will be filled through promotion from Qaries / Qarias on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post Qari/Qaria as per service rules.

- The Administrative Department however, should devise a policy in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, extra-curricular and co-curricular achievements and other performance indicators so that teachers do not take the scheme for granted but work for it.
- Audit copies may be prepared and furnished to this department for authentication, please.

Yours faithfully,  
  
 o/c (BIBI FATIMA)  
 SECTION OFFICER (FR)

Copy is forwarded to:-

Budget Officer-V, Finance Department for information and further necessary action please.

  
 27/01/16

  
 o/c SECTION OFFICER (FR)



"F" -15-

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar, 11.07.2012

**NOTIFICATION:**

No. SO (B & A) / 1-18/E & SE / 2012. Sanctions of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of Teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Sr. No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary Head Teacher (PSHT)	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teacher (CT)	Govt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teacher (AT)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

12.	Physical Education Teachers (PET's)	"do"	BPS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	PTS are upgraded to BPS-15 for the posts as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One third (1/3 <sup>rd</sup> ) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qaria	"do"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the posts as well as future appointees.
15.	Sr. Qari/Sr. Qaria	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	One third (1/3 <sup>rd</sup> ) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07 2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.  
All District Account Officers

*F. Ahmad*

SECTION OFFICER (FR)  
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

*Noor Alam Khan Wazir*  
(NOOR ALAM KHAN WAZIR)  
SECTION OFFICER (B&A)  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

9	10	11	12	13		14	15	
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to Government			
Signature and nature of the office or other attesting officer				Period	Government to which debit	Signature of the head of the office or other attesting officer		
Signature and nature of the office or other attesting officer		Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Period	Government to which debit	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
H/mtk D.O (Male) Charsadda	30/6/2011	Revised B-5	H/mtk D.D.O (Male) Charsadda				H/mtk D.D.O (M) Charsadda	-17- "G" Service Verified w.e.f. 01-12-03 to 30-11-04 from the Acq. Roll & other records of this office.
H/mtk D.O (Male) Charsadda	30/11/2011	A/C	H/mtk D.D.O (Male) Charsadda				H/mtk D.D.O (M) Charsadda	Service Verified w.e.f. 01-12-04 to 30-11-05 from the Acq. Roll & other records of this office.
H/mtk D.O (Male) Charsadda	30/6/2012	Upgraded to B-12	H/mtk D.D.O (Male) Charsadda				H/mtk D.D.O (M) Charsadda	Service Verified w.e.f. 01-12-05 to 30-11-07 from the Acq. Roll & other records of this office.
H/mtk D.O (Male) Charsadda	30/11/12	Abnc TR 1019 12/x	H/mtk S.D.E.O (M) Charsadda				H/mtk D.D.O (M) Charsadda	Service Verified w.e.f. 01-12-05 to 30-11-07 from the Acq. Roll & other records of this office.
Dm Rs: 1772/ on A/C of upgradation ref. 1/12 to 30/12/12								
H/mtk S.D.E.O (M) Charsadda	30/11/13	Abnc	H/mtk S.D.E.O (M) Charsadda				H/mtk D.D.O (Male) Charsadda	Service verified w.e.f. 01-12-07 to 30-11-09 from the Acq. Roll & other record of this office.
H/mtk S.D.E.O (M) Charsadda	30/11/14	A/C	H/mtk S.D.E.O (M) CHD				H/mtk D.D.O (Male) Charsadda	Service verified w.e.f. 01-12-09 to 30-11-11 from the Acq. Roll & other record of this office.

## National Bank of Pakistan

## Account Statement

Account Title(s) NADIR ALI KHAN S/O SARDAR ALI

Address: CHEENA P/O, TANGI-CHARSADDA  
0301-8836131

Postal Code:

Branch Code/Name: 410 Tehsil Bazar Branch Charsaddah

Region Name: Peshawar

Statement Printing Date: 20-Dec-2021

User: 00013070 Branch: 410 Terminal: VDIPSH

Town:

District:

City: CHARSADDA

Province/State: KH. PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 11009049

Account No: 4109903531

IBAN: PK05NBP0410004109903531

B/F Balance: 38,855.75

From: 01-Jan-2021

To: 20-Dec-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	02-Jan-2021	ATM CASH WITHDRAWL	401		18,500.00	0.00	20,355.75
2	02-Jan-2021	WITHDRL	401		18.75	0.00	20,337.00
3	03-Jan-2021	ATM CASH WITHDRAWL	74		20,000.00	0.00	337.00
4	03-Jan-2021	WITHDRL	74		18.75	0.00	318.25
5	29-Jan-2021	SALARY		29	0.00	38,525.00	38,843.25
6	01-Feb-2021	ATM CASH WITHDRAWL	368		20,000.00	0.00	18,843.25
7	01-Feb-2021	WITHDRL	368		18.75	0.00	18,824.50
8	01-Feb-2021	ATM CASH WITHDRAWL	370		18,500.00	0.00	324.50
9	01-Feb-2021	WITHDRL	370		18.75	0.00	305.75
10	26-Feb-2021	SALARY		26	0.00	38,526.00	38,831.75
11	01-Mar-2021	ATM CASH WITHDRAWL	785		20,000.00	0.00	18,831.75
12	01-Mar-2021	ATM CASH WITHDRAWL	789		18,500.00	0.00	331.75
13	31-Mar-2021	SALARY		31	0.00	37,926.00	38,257.75
14	01-Apr-2021	ATM CASH WITHDRAWL	735		20,000.00	0.00	18,257.75
15	01-Apr-2021	ATM CASH WITHDRAWL	737		18,000.00	0.00	257.75
16	29-Apr-2021	ATM BAL INQ. FEE			2.50	0.00	255.25
17	29-Apr-2021	SALARY		29	0.00	29,122.00	29,377.25
18	29-Apr-2021	ATM BAL INQ. FEE			2.50	0.00	29,374.75
19	29-Apr-2021	ATM CASH WITHDRAWL	475		20,000.00	0.00	9,374.75
20	29-Apr-2021	WITHDRL	475		18.75	0.00	9,356.00
21	29-Apr-2021	ATM CASH WITHDRAWL	477		9,000.00	0.00	356.00
22	29-Apr-2021	WITHDRL	477		18.75	0.00	337.25
23	31-May-2021	SALARY		31	0.00	30,122.00	30,459.25
24	01-Jun-2021	SERVICE CHARGES			900.00	0.00	29,559.25
25	01-Jun-2021	FED			135.00	0.00	29,424.25

This is a computer generated statement and does not require any signature

Page 1 of 3

# National Bank of Pakistan

## Account Statement

- 19 -

Account Title(s) NADIR ALI KHAN S/O SARDAR ALI

Address: CHEENA P/O TANGI CHARSADEA  
0301-8836131

Postal Code:

Branch Code/Name: 410 Tehsil Bazar Branch Charsaddah

Region Name: Peshawar

Statement Printing Date: 20-Dec-2021

User: 00013070

Branch: 410

Terminal: VDIPSH

Town:

District:

City:

Province/State:

Country:

Product Name: PKR Current Account

Currency:

CIF No: 11009049

Account No: 4109903531

IBAN:

B/F Balance: 38,855.75

From: 01-Jan-2021

To: 20-Dec-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
					2.50	0.00	29,421.75
26	01-Jun-2021	ATM BAL INQ. FEE					
27	01-Jun-2021	ATM CASH WITHDRAWL			20,000.00	0.00	9,421.75
28	01-Jun-2021	WITHDRL			18.75	0.00	9,403.00
29	01-Jun-2021	ATM CASH WITHDRAWL			9,000.00	0.00	403.00
30	01-Jun-2021	WITHDRL			18.75	0.00	384.25
31	30-Jun-2021	SALARY		30	0.00	30,122.00	30,506.25
32	02-Jul-2021	ATM CASH WITHDRAWL			20,000.00	0.00	10,506.25
33	02-Jul-2021	WITHDRL			18.75	0.00	10,487.50
34	02-Jul-2021	ATM CASH WITHDRAWL			10,000.00	0.00	487.50
35	02-Jul-2021	WITHDRL			18.75	0.00	468.75
36	15-Jul-2021	ATM BAL INQ. FEE			2.50	0.00	466.25
37	15-Jul-2021	SALARY		15	0.00	41,463.00	41,929.25
38	17-Jul-2021	ATM BAL INQ. FEE			2.50	0.00	41,926.75
39	17-Jul-2021	ATM CASH WITHDRAWL			20,000.00	0.00	21,926.75
40	17-Jul-2021	WITHDRL			18.75	0.00	21,908.00
41	17-Jul-2021	ATM BAL INQ. FEE			2.50	0.00	21,905.50
42	17-Jul-2021	ATM CASH WITHDRAWL			20,000.00	0.00	1,905.50
43	17-Jul-2021	WITHDRL			18.75	0.00	- 1,886.75
44	17-Jul-2021	ATM CASH WITHDRAWL			1,500.00	0.00	386.75
45	17-Jul-2021	WITHDRL			18.75	0.00	368.00
46	05-Aug-2021	WITHDRL		05	12.50	0.00	355.50
47	31-Aug-2021	SALARY		31	0.00	37,169.00	37,524.50
48	01-Sep-2021	ATM BAL INQ. FEE			2.50	0.00	37,522.00
49	01-Sep-2021	ATM CASH WITHDRAWL			20,000.00	0.00	17,522.00
50	01-Sep-2021	WITHDRL			18.75	0.00	17,503.25

This is a computer generated statement and does not require any signature

Page 2 of 3

# National Bank of Pakistan

## Account Statement

Account Title(s) NADIR ALI KHAN S/O SARDAR ALI

Address: CHEENA P/O TANGI CHARSAJDA  
0301-8836131

Postal Code:

Branch Code/Name: 410 Tehsil Bazar Branch Charsaddah

Region Name: Peshawar

Statement Printing Date: 20-Dec-2021

User: 00013070

Branch: 410

Terminal: VDIPSH

Town:

District:

City:

Province/State:

Country:

Product Name: PKR Current Account

Currency:

CIF No: 11009049

Account No: 4109903531

IBAN:

B/F Balance: 38,855.75

From: 01-Jan-2021

To: 20-Dec-2021

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
51	01-Sep-2021	ATM CASH WITHDRAWL			17,000.00	0.00	503.25
52	01-Sep-2021	WITHDRL			18.75	0.00	484.50
53	07-Sep-2021	WITHDRL		07	5.00	0.00	479.50
54	30-Sep-2021	SALARY		30	0.00	33,785.00	34,264.50
55	01-Oct-2021	ATM BAL INQ. FEE			2.50	0.00	34,262.00
56	01-Oct-2021	ATM CASH WITHDRAWL			20,000.00	0.00	14,262.00
57	01-Oct-2021	WITHDRL			18.75	0.00	14,243.25
58	01-Oct-2021	ATM CASH WITHDRAWL			14,000.00	0.00	243.25
59	01-Oct-2021	WITHDRL			18.75	0.00	224.50
60	31-Oct-2021	SALARY		31	0.00	33,785.00	34,009.50
61	01-Nov-2021	CASH WITHDRAWAL	9304742		20,000.00	0.00	14,009.50
62	03-Nov-2021	CASH WITHDRAWAL	9304743		14,000.00	0.00	9.50
63	30-Nov-2021	SALARY		30	0.00	33,785.00	33,794.50
64	01-Dec-2021	CASH WITHDRAWAL	9304744		30,000.00	0.00	3,794.50
65	04-Dec-2021	ATM CASH WITHDRAWL			2,000.00	0.00	1,794.50
66	04-Dec-2021	WITHDRL			18.75	0.00	1,775.75

Total 11 Credit transactions of amount: 384,330.00

Total 55 Debit transactions of amount: 421,410.00

This is a computer generated statement and does not require any signature

Page 3 of 3



**Dist. Govt. KP-Provincial**  
**District Accounts Office Charsadda**  
**Monthly Salary Statement (March-2021)**

-21-



Personal Information of Mr NADAR ALI d/w/s of SARDAR ALI

Personnel Number: 00147148 CNIC: 99993004657  
 Date of Birth: 16.01.1968 Entry into Govt. Service: 16.01.1988

NTN:  
 Length of Service: 33 Years 02 Months 017 Days

Employment Category: Vocational Permanent

Designation: PRIMARY SCHOOL TEACHER 80001042-DISTRICT GOVERNMENT KHYBE

DDO Code: CA6012-DEPUTY DISTRICT OFFICER (MALE) PRIM EDUCATION CHARSADEA (REGULAR)

Payroll Section: 001 GPF Section: 001 Cash Center: 05

GPF A/C No: EDUCA000637 Interest Applied: Yes GPF Balance: 288,606.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 12 Pay Stage: 19

Wage type		Amount	Wage type		Amount
0001	Basic Pay	31,560.00	1000	House Rent Allowance	1,961.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	675.00	2199	Adhoc Relief Allow @ 10%	454.00
2211	Adhoc Relief All 2016 10%	2,114.00	2274	Adhoc Relief All 2017 10%	3,156.00
2247	Adhoc Relief All 2018 10%	3,156.00	2264	Adhoc Relief All 2019 10%	3,156.00

Deductions - General

Wage type		Amount	Wage type		Amount
3012	GPF Subscription	-2,220.00	357	Revolvent fund	-1,200.00
3619	Income Tax	-17.00	3990	Emp Edu Fund KPS	-128.00
4004	R. Benefits & Death Comp.	600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	31,000.00	-8,700.00	234,700.00

Deductions - Income Tax

Payable: 160.75 Recovered till MAR-2021: 70.00 Exempted 40.05 Recoverable: 50.70

Gross Pay (Rs.): 50,788.00 Deductions: (Rs.): -12,862.00 Net Pay: (Rs.): 37,926.00

Payee Name: NADAR ALI

Account Number: 5022-1

Bank Details: NATIONAL BANK OF PAKISTAN, 230410 TEHSIL BAZAR, Charsadda, TEHSIL BAZAR, Charsadda, Charsadda

Leaves: Opening Balance: Aailed: Eaned: Balance:

Permanent Address: SDEO M CHARSADEA

City: CHARSADEA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: khannadarali@gmail.com

System generated document in accordance with APPM 4.6.12.9(SERVICES/31.03.2021/01:13:15/v2.0)  
 \* All amounts are in Pak Rupees  
 \* Errors & omissions excepted

Dist: Govt. KP-Provincial  
District Accounts Office Charsadda  
Monthly Salary Statement (April-2021)

-22-

Design: Elementary Teacher



Personal Information of Mr NADAR ALI d/w/s of SARDAR ALI

Personnel Number: 00147148 CNIC: 99993004657  
Date of Birth: 16.01.1968 Entry into Govt. Service: 16.01.1988

NTN: |  
Length of Service: 33 Years 03 Months 016 Days

Employment Category: Vocational Permanent

Designation: PRIMARY SCHOOL TEACHER DEI- 80001042-DISTRICT GOVERNMENT KHYBE  
DDO Code: CA6012-DEPUTY DISTRICT OFFICER (MALE) PRIM EDUCATION CHARSADEA (REGULAR)  
Payroll Section: 001 GPF Section: 001 Cash Center: 05  
GPF A/C No: EDUCA000637 Interest Applied: Yes GPF Balance: 298,316.00  
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 07 Pay Stage: 29

Wage type	Amount	Wage type	Amount
0001 Basic Pay	23,680.00	1000 House Rent Allowance	1,589.00
1210 Convey Allowance 2005	1,932.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	634.00	2199 Adhoc Relief Allow @ 10%	436.00
2211 Adhoc Relief All 2016 10%	2,197.00	2224 Adhoc Relief All 2017 10%	2,868.00
2247 Adhoc Relief All 2018 10%	2,868.00	2264 Adhoc Relief All 2019 10%	2,868.00

Deductions - General

Wage type	Amount	Wage type	Amount
3007 GPF Subscription	-1,010.00	2801 Benevolent Fund	-1,200.00
3914 Education (RDP)	-4,000.00	3950 Emp Edo. Fund KPK	-90.00
4004 R. Benefits & Death Comp:	-450.00	4200 Professional Tax	-1,000.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	313,000.00	-8,700.00	226,000.00

Deductions - Income Tax

Payable: 0.00 Recovered till APR-2021: 70.00 Exempted: 70.00 Recoverable: 0.00

Gross Pay (Rs.): 45,572.00 Deductions: (Rs.): -16,450.00 Net Pay: (Rs.): 29,122.00

Payee Name: NADAR ALI

Account Number: 5022-1

Bank Details: NATIONAL BANK OF PAKISTAN, 230410 TEHSIL BAZAR, Charsadda, TEHSIL BAZAR, Charsadda, Charsadda

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: SDEO M CHARSADEA

City: CHARSADEA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: khannadarali@gmail.com

System-generated document in accordance with APPM 4.6.12.9(287094/23.04.2021/v3.0)  
All amounts are in Pak Rupees  
Errors & omissions excepted (SERVICES/30.04.2021/02-26-53)

-23-

**Dist. Govt. KP-Provincial**  
**District Accounts Office Charsadda**  
**Monthly Salary Statement (July-2021)**



**Personal Information of Mr NADAR ALI d/w/s of SARDAR ALI**

Personnel Number: 00147142

CNIC: 99993004657

NTN:

Date of Birth: 16.01.1968

Entry into Govt. Service: 16.01.1988

Length of Service: 33 Years 06 Months 017 Days

**Employment Category: Vocational Permanent**

**Designation: PRIMARY SCHOOL TEACHER**

80001042-DISTRICT GOVERNMENT KHYBE

**DDO Code: CA6012-DEPUTY DISTRICT OFFICER (MALE) PRIM EDUCATION CHARSADDA (REGULAR)**

Payroll Section: 001

GPF Section: 001

Cash Center: 05

GPF A/C No: EDUC A006637

Interest Applied: Yes

GPF Balance: 327,446.00

Vendor Number:

**Pay and Allowances:**

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 07

Pay Stage: 29

Wage type		Amount	Wage type		Amount
0001	Basic Pay	28,680.00	1001	House Rent Allowance 45%	2,384.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	634.00	2199	Adhoc Relief Allow (a 10%)	436.00
2211	Adhoc Relief All 2016 10%	2,197.00	2224	Adhoc Relief All 2017 10%	2,868.00
2247	Adhoc Relief All 2018 10%	2,868.00	2264	Adhoc Relief All 2019 10%	2,868.00
2309	Adhoc Relief All 2020 10%	2,868.00	2271	Special Allowance 2017	3,500.00
5002	Adjustment House Rent	204.00	2279	Ad Special Allow 2017	3,500.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3007	GPF Subscription	900.00	2271	Special Allowance 2017	3,500.00
3609	Income Tax	316.00	2279	Ad Special Allow 2017	3,500.00
3990	Emp. Edu. Fund KPK	900.00			

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	199,900.00	8,000.00	199,900.00

**Deductions - Income Tax**

Payable: 1,855.65 Recovered till JUL-2021: 116.00 Exempted: 463.87 Recoverable: 1,275.78

**Gross Pay (Rs.): 57,029.00 Deductions: (Rs.): -15,566.00 Net Pay: (Rs.): 41,463.00**

Payee Name: NADAR ALI

Account Number: 5022-1

Bank Details: NATIONAL BANK OF PAKISTAN, 230410 TEHSIL BAZAR, Charsadda. TEHSIL BAZAR, Charsadda., Charsadda

**Leaves:** Opening Balance: Aailed: Earned: Balance:

Permanent Address: SDEO M CHARSADDA

City: CHARSADDA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: khannadarali@gmail.com

System generated document in accordance with APPM 4.6.12.9(287094/13.07.2021/3.0)

\* All amounts are in Pak Rupees

\* Errors & omissions excepted (SERVICES/16.07.2021/21:36:19)

**Dist. Govt. KP-Provincial**  
**District Accounts Office Charsadda**  
**Monthly Salary Statement (November-2021)**

- 24 -  
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 - 2021



**Personal Information of Mr NADAR ALI d/w/s of SARDAR ALI**

Personnel Number: 00147148 CNIC: 99993004657 NTN:  
 Date of Birth: 16.01.1968 Entry into Govt. Service: 16.01.1988 Length of Service: 33 Years 10 Months 016 Days

**Employment Category: Vocational Permanent**

Designation: PRIMARY SCHOOL TEACHER 80001042-DISTRICT GOVERNMENT KHYBE  
 DDO Code: CA6012-DEPUTY DISTRICT OFFICER (MALE) PRIM EDUCATION CHARSADDA (REGULAR)

Payroll Section: 001 GPF Section: 001 Cash Center: 05  
 GPF A/C No: EDUCA000637 Interest Applied: Yes GPF Balance: 386,881.00

Vendor Number: Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 07 Pay Stage: 29

Wage type		Amount	Wage type		Amount
0001	Basic Pay	28,680.00	1001	House Rent Allowance 45%	2,384.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	634.00	2199	Adhoc Relief Allow @10%	436.00
2211	Adhoc Relief All 2016 10%	2,197.00	2224	Adhoc Relief All 2017 10%	2,868.00
2247	Adhoc Relief All 2018 10%	2,868.00	2264	Adhoc Relief All 2019 10%	2,868.00
2309	Adhoc Relief All 2021 10%	2,868.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3007	GPF Subscription	-1,010.00	3501	Beneficial Fund	-1,200.00
3914	Education (ROP)	-1,000.00	4000	Emp. Edu. Fund KPK	-90.00
4004	R. Benefits & Death Comp	-150.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	313,000.00	-8,700.00	165,100.00

**Deductions - Income Tax**

Payable: 0.00 Recovered till NOV-2021: 232.00 Exempted: 232.00- Recoverable: 0.00

Gross Pay (Rs.): 49,235.00 Deductions: (Rs.): -15,450.00 Net Pay: (Rs.): 33,785.00

Payee Name: NADAR ALI

Account Number: 5022-1

Bank Details: NATIONAL BANK OF PAKISTAN, 230410 TEHSIL BAZAR, Charsadda. TEHSIL BAZAR, Charsadda., Charsadda

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: SDEO M CHARSADDA

City: CHARSADDA Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City: Email: khannadarali@gmail.com

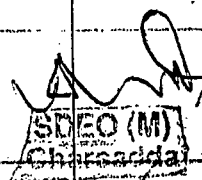
System generated document in accordance with APPM 4.6.12.9(288598/25.11.2021/v3.0)

All amounts are in Pak Rupees.

Errors & omissions excepted. (SERVICES/30.11.2021/16:36:24)

-25- 19th A

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
<b>Revised Entry due to incorrect upgradation of POSE from BPS NO-05 to BPS NO-12</b>							
Elementary Teacher - G.M.K.S. Farnab			BPS NO-05	Rs = 11900/-		1-12-11	
			"	Rs = 12160/-		1-12-12	
			"	Rs = 12420/-		1-12-13	
			"	Rs = 12680/-		1-12-14	
Pay Revised wef 7/15			"	Rs = 16505/-		1-7-15	
<b>02 Step upgradation of post wef 01-07-2015</b>							
			BPS NO-07	Rs = 16620 + 415 = 17035/-		1-7-15	
A/Incl in BPS NO-05				Rs = 16845/-		1-12-15	
Refixation of pay in BPS NO-07				Rs = 17035 + 415 = 17450/-		2-12-15	
<b>Pay Revised wef 01-07-2016</b>							
				Rs = 21460/-		1-7-16	
				Rs = 21970/-		1-12-16	
<b>Pay Revised wef 01-07-2017</b>							
				Rs = 26140/-		1-7-17	
				Rs = 26750/-		1-12-17	
				Rs = 27360/-		1-12-18	
				Rs = 27970/-		1-12-19	
				Rs = 28580/-		1-12-20	

  
 SDEO (M)  
 Charsadda

9 Signature and of the office or ther attesting er in attestation columns 1 to 8	10 Date of termination of appoint- ment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		
<p><i>"Recovery of overpayment"</i></p> <p><i>4000/-</i></p> <p><i>A sum of Rs = 5912/- P.M</i></p> <p><i>Recovery has been started</i></p> <p><i>wef 01-04-2021 through Payroll</i></p> <p><i>Total Recovery is Rs = 212638/-</i></p>							
<p><i>[Signature]</i></p> <p><b>SDEO (M)</b> Charsadda</p>							
<p><i>RoP Rs-212638/- am A/c of</i></p> <p><i>Pay @ Allowances @ Rs-4000/- P.m</i></p> <p><i>Deductions, for The month of</i></p> <p><i>04/2021</i></p>							
<p><b>SERVICE VERIFIED W.E.F 01-12-18</b></p> <p><b>TO 30-10-20 FROM ACQ ROLL</b></p> <p><b>AND OTHER RECORD OF THIS OFFICE</b></p>							
<p><b>SDEO (M)</b> Charsadda</p> <p><i>[Signature]</i></p>							

"J"  
-27-

To,

The Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar,

Subject:- APPEAL TO REQUEST FOR GRANT OF BPS-12

Respected Sir,

It is most humbly submitted that I joined Education department as Elementary School Teacher in BPS-5 on 16-01-1988 subsequently, I passed my PTC examination on 23-05-1995 and F.A examination 06-09-2013, therefore, I became qualified to be promoted in terms of Notification No. SO (FR)FD/10-22(E) 2010 dated 06-07-2012 through which the elementary teacher has been declared entitled for promotion in BPS-12.

The appellant in the month of April approached his superiors as to why his complete salary is not being paid, the superiors of the appellant that is must be clerical mistake and will be rectified soon enough after which the every month the salary of appellant became less and less whereas the superiors made lame excuses and finally tried the best to convince the appellant that they are trying their best to resolve the issue. In the first week of January, the appellant obtained the copy of his service book wherein according to entries contained in the service book it has been mentioned that the appellant has been upgraded from BPS-5 to BPS 12, but ironically subsequently it was mentioned that the appellant had been promoted wrongly after 10 long years of service and has been reverted BPS-5 to BPS-7 and also recovery process has been initiated on 01-04-2021 for recovery of Rs: 2,12,638/- dated (Nil) against the appellant. That upon enquiry from his superiors the appellant was assured that the entry is an inadvertent mistake and will soon be rectified in the last week of November 2021, however till the date of filing this appeal, the appellant have yet not received any office order, copy of

notification or any circular regarding the revised the entry from BPS 12 to BPS 5 or cutting, deduction or recovery process nor any letter of upgradation to BPS-12 as promised by the superiors of the appellant and the appellant have received pay which has not been fixed in accordance with law applicable with monthly deduction, thus the appellant is constrained to file this representation.

It is therefore most humbly requested that on acceptance of this appeal, that the impugned entry dated (Nil) in the service book of the appellant being illegal, unlawful and against the law may be set-aside and withdrawn. The appellant may be reverted/ upgraded/ restored with all back benefits to his previous position as BPS-12 in accordance with law and notification dated 12-02-2012 and subsequent benevolent notification and deduction and recovery process may be stop which is against the law.

Dated:- 27-12-2021

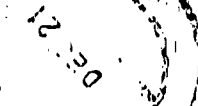


Nadar Ali son of Sardar Ali Khan  
R/O P.O Cheena, Tehsil Tangi, District  
Charsadda,  
Designation: Primary School Teacher  
Posted at: Government Primary School  
Spalmi, Tarnab Charsadda  
CNIC# 99993004657  
Cell#0301-8836131

Copy to: District Education Officer (Male),  
Elementary & Secondary Education, Charsadda



No. 2015



For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. 50 Ps. 50

Received a registered address to

DEO Male Date Stamp

Initials of Receiving Office

\*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

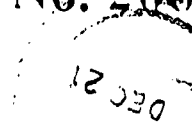
Insured for Rs. (in figures) RGL57925256 (in words) Char Sudda

If insured

Insurance fee Rs. Ps. (in words) Weight Kilo Grams

Name and address of sender

No. 2016



For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. 50 Ps. 50

Received a registered address to

Directorate of Revenue Date Stamp

Initials of Receiving Office

\*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) 57925256 (in words) Char Sudda

If insured

Insurance fee Rs. Ps. (in words) Weight Kilo Grams

Name and address of sender

RP-54

Postage stamps section featuring three 54p stamps and two 8p stamps, with handwritten numbers 57925256 and 57925256, and Urdu text including 'کتاب الیوم' and '29/12/2021'.

-29-

VAKALATNAMA  
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Service Appeal No. \_\_\_\_\_/2022

NADIR ALI KHAN .....Appellant

V E R S U S

DEO & others .....Respondent(s)

I, the undersigned, do hereby appoint and constitute,

**Fazal Shah Mohmand** Advocate Supreme Court & Rabia Muzaffar Advocate. To act, appear and plead in the above-mentioned matter and to withdraw or compromise the said matter or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said matter and to receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said matter.

1. To draft and sign files at necessary pleadings, applications, objections, affidavits or other documents as shall be deemed necessary and advisable for the prosecution of the said matter at all its stages.
2. To employ any other Legal Practitioner, authorizing him to exercise the power as conferred on the undersigned Advocate, wherever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. I further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received by me on 1/4/2022

CLIENT(s) 

ACCEPTED BY:

  
**FAZAL SHAH MOHMAND**  
ADVOCATE,  
SUPREME COURT OF PAKISTAN.

&

&

ACCEPTED BY:

**RABIA MUZAFFAR**

  
**ABDUL SAMAD HASNAIN**  
ADVOCATES HIGH COURT PESHAWAR