

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mr. Tariq Mahmood Service Appeal No. 85/2023..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa

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DEPONENT

CNIC No. 17101-0377128-9

Cell No. 0346-9148582

4/7/23

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mr. Tariq Mahmood Service Appeal No. 85/2023..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa

AFFDAVIT

I Syed Nabi Gul, Superintendent (Lit) Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of the accompanying reply/comments are true and correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'ble Tribunal.

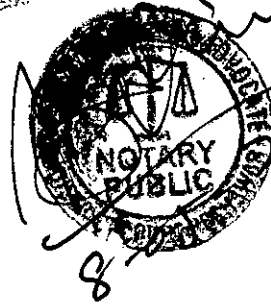


DEPONENT

CNIC No. 17101-0377128-9

Cell No. 0346-9148582

ATTESTED



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 85/ 2023

Tariq Mahmood.....Appellant

VERSUS

- 1. Govt. of Khyber Pakhtunkhwa through Chief Secretary
- 2. Govt. of Khyber Pakhtunkhwa through Secretary Social Welfare, Special Education & Women Empowerment Department Peshawar
- 3. Director, Social Welfare, Special Education & Women Empowerment Peshawar
- 4. Secretary Establishment Govt of Khyber Pakhtunkhwa Peshawar
- 5. Secretary Finance Govt of Khyber Pakhtunkhwa Peshawar **Respondents**

Respectfully Sheweth:

PARA-WISE COMMENT ON BEHALF OF RESPONDENTS

PRE-LIMINARY OBJECTIONS:

- 1. The appellant has got no cause of action to file this service appeal.
- 2. That the appeal is not maintainable in its present form.
- 3. That the appellant has no locus standi to file the present service appeal.
- 4. The appeal is badly time barred. Therefore, the appeal is not maintainable.
- 5. That the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar vide judgment dated 12.05.2016 has already dismissed identical case in light of the judgment of august Supreme Court of Pakistan dated 17.02.2017 delivered in Civil Appeal No. 101 & 102-P of 2011 that the Service Tribunal have no jurisdiction to entertain any appeal involving the issue of up-gradation (**Annexure-A**). Therefore, the appeal in hand is not maintainable.

FACTS:

- 1. No comments:-
- 2. Pertain to record.
- 3. Correct to the extent that prior to devolution, the respective department of the appellant was under the administrative control of Federal Govt under Ministry of Social Welfare and Special Education, Government of Pakistan.

4. Correct.
5. Pertains to record.
6. Incorrect, hence denied. The respondent department has implemented all the sections of the Act/Ordinance i.e. Pension, Gratuity leave encashment except benevolent fund issues, for which a case with the Federal Govt. regarding mechanism of GP Fund transfer to Province of Khyber Pakhtunkhwa shall be taken.
7. Incorrect, hence denied. The appellant was devolved to Provincial Govt. of Khyber Pakhtunkhwa under the 18th Constitutional Amendment and was absorbed as a regular employee in the same scale and post i.e. BPS-18 in the Special Education Institute (Devolved). As far as 4-tier formula is concerned, in this connection it is stated that prior to devolution the Directorate General of Special Education, Government of Pakistan Islamabad implemented the said formula on teaching as well administrative cadres under their administrative control. The 4-tier formula has never been introduced / implemented by the Government of Khyber Pakhtunkhwa on the employees of Special Education Institutions worked / working under their administrative control before and after devolution. The Government of Khyber Pakhtunkhwa has framed its own rules / regulation for promotion / award of higher pay scale. As far as the fate of devolved employees is concerned, this Honorable Tribunal is informed that draft service structure has been proposed and is under process, as and when the said service structure is approved from the competent forum, the appellant as well as his colleagues shall be promoted / up-graded in next higher pay scale based on seniority-cum-fitness.
8. Incorrect, hence denied. As per judgment dated 21.11.2016 of the Honorable Islamabad High Court, Islamabad the devolved employees have been absorbed w.e.f January 2018, treated as Civil Servants and also had been awarded promotions / up-gradation / award of higher pay scales etc in light of Provincial Government (Social Welfare, Special Education & Women Empowerment Department) policy. So far the service structure etc is concerned, in this connection factual position has been explained in Para-7 above.

9. Incorrect, hence denied. The said judgment has been implemented in letter and spirit. About 4-tier formula factual position has been explained in the preceding paras.
10. Incorrect, hence denied. The appellant has been absorbed and treated as civil servant of the Government of Khyber Pakhtunkhwa. His basic rights are protected / guaranteed as per law. As far as 4-tier formula provided by the Federal Government is concerned, in this connection it is stated that the Directorate General of Special Education Govt. of Pakistan had no such policy for the teachers under their administrative control. The policy of award of higher pay scales for the teachers of Special Education Institutions have been formulated by the Government of Khyber Pakhtunkhwa. The provincial government has meager resources and cannot bear the expenses of two different formulas i.e. 4-tier formula and award of higher pay scale.
11. Incorrect, hence denied. The factual position has been explained in the preceding paras.
12. Incorrect, hence denied. The appellant has no cause of action to file the instant service appeal.

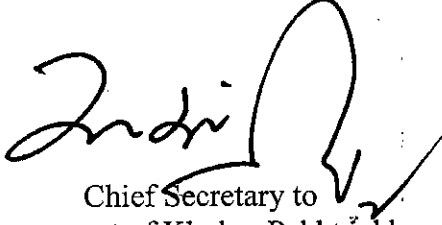
GROUND:

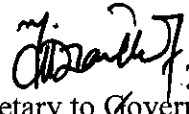
- A. No comments.
- B. Incorrect, hence denied. The factual position has been explained in the preceding paras of the facts.
- C. Incorrect, hence denied. Each Province / Department has their own rules, regulations / formulas for up-gradation / promotion keeping in view of the basic rights of the civil servants. The Provinces / Department adopt / prescribe criteria for providing up-gradation / promotion to their employees keeping in view the financial implications / sources / requirement in light of the total sanctioned strength. The Department of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa providing one running basic pay (**Freeze on 30.06.2022**) 25% teaching allowance in addition to the monthly pay to the employees of Special Education Institutions (Devolved) under the 18th constitutional amendment. Besides above, the teachers of Special Education Institutions are also enjoying award of higher pay scale policy in light of Notification dated 24.07.1986 issued by the Govt. of Khyber Pakhtunkhwa, Finance Department (**Annexure-B**) as well as up-gradation in light of Notification dated 30.06.2015 (**Annexure-C**), therefore, claim of the appellant with


regard to Education Sector, Education Departments across the Province, Higher Education Department or Elementary & Secondary Education Department of Khyber Pakhtunkhwa is total baseless and un-justified.


- D. Incorrect, hence denied. The factual position has been explained in the preceding paras.
- E. In reply to Para-E of the grounds, it is submitted that the factual position has been explained in the preceding paras.
- F. Incorrect, hence denied. The factual position has been explained in Para-7 of the facts above.
- G. Incorrect, hence denied. The appellant was appointed in 2001 in BPS-17 and was upgraded to BPS-18 w.e.f 14.06.2008 just after approximately 07 years' service under the Directorate General of Special Education Govt of Pakistan Islamabad, therefore claim of BPS-20 w.e.f 2015 is baseless, against the rules / policy.
- H. Incorrect, hence denied. The factual position has been explained in the preceding paras.
- I. Incorrect, hence denied. The factual position has been explained in the preceding paras.
- J. The respondents also seek permission of this Honorable Tribunal to raise additional grounds at the time of hearing.


Keeping in view the above facts, it is humbly requested that the appeal devoid of any merit may graciously be dismissed.


 Chief Secretary to
 Government of Khyber Pakhtunkhwa
 (Respondent No. 1)


 Secretary to Government of Khyber
 Pakhtunkhwa, Social Welfare, Special
 Education & Women Empowerment
 Department
 (Respondent No. 2)


 Secretary to Govt. of Khyber
 Pakhtunkhwa,
 Establishment Department
 (Respondent No. 4)


 Secretary to Govt. of Khyber
 Pakhtunkhwa,
 Finance Department
 (Respondent No. 5)


 Director, Social Welfare, Special Education and
 Women Empowerment,
 Govt. of Khyber Pakhtunkhwa
 (Respondent No. 3)

Before the KPK Service Tribunal PeshawarAppeal No. 1869/2011Umar Zarin, Investigator, Directorate of social welfare and Women
Development Department Khyber Pakhtunkhwa Peshawar

..... Appellant

Versus1866
08/12-11

1. Government of KPK through Chief Secretary KPK Peshawar.
2. Government of KPK through Secretary Finance Department Peshawar.
3. Government of KPK through secretary welfare and special Education and women Development Department Peshawar.
4. Director, Social welfare and women Development Department Peshawar.

..... Respondents

Appeal under section 4 of KPK Service Tribunal Act, 1974 for upgradation of and re-designation of Investigator (BPS-16) as Assistant Director (BPS-17) with effect from 17-8-2011 with all back benefits.


Respectfully Shewith:

The appellant respectfully submits as under:

1. That the appellant is presently serving as Investigator (BPS-16) in Directorate of Social welfare and women Development Department Peshawar.
2. That the four provinces of the country i.e Punjab, Sindh, Baluchistan , KPK as well as the Federal Bureau of statistics have upgraded the posts of statistical Investigators (BPS-16) and have redesignated as statistical officers (BPS-17).

Copies are attached at annexures A,B,C,D and E respectively.

3. That the appellant having similar nature of duty and qualification alike the statistical officers (BPS-17) in Punjab, Sindh, Baluchistan, KPK and Federal Bureau of Statistics but has been deprived for not upgradina of his

Attested


KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO.1869/2011

(Umar Zarin-vs- Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar and others).

2. 5.2016

JUDGMENT

PIR BAKHSI SHAH, MEMBER:

Counsel for the appellant (Mr. Aslam Khan Khattak, Advocate) and Mr. Muhammad Jan. GP for respondents present.

In the instant appeal issue of up-gradation is involved and according to the judgment of august Supreme Court of Pakistan dated 17.02.2016 delivered in Civil Appeal No. 101 & 102-P of 2011 the service Tribunals have no jurisdiction to entertain any appeal involving the issue of up-gradation as it does not part of terms and conditions of service of the Civil servants.

In view of the above the appeal was not found maintainable by this Tribunal for want of jurisdiction. The same is therefore dismissed. The appellant may seek his remedy before any other appropriate forum if so advised. File be assigned to the record room.

Announced

12-05-2016

PIR BAKHSI SHAH
Member

M. Amir Nadeem
Member

Attested

[Signature]

Asstt. Director (Litigation)
Social Welfare, SE and WE,
Khyber Pakhtunkhwa.

18
No. FD(SR-1)1-95/84-III

GOVERNMENT OF N.W.F.P.
FINANCE DEPARTMENT

Dated Peshawar, the 24th July 1986

From

Muzafar Ullah Jan,
Secretary to
Government of N.W.F.P.,
Finance Department,
Peshawar.

To

The Secretary to
Government of N.W.F.P.,
Health and Social Welfare Department,
Peshawar.

Subject:- REVISION OF PAY SCALES OF THE TEACHERS WORKING
IN THE INSTITUTIONS FOR THE HANDICAPPED

Sir,

I am directed to refer to the subject noted above and to say that the matter regarding grant of enhanced pay scales to different categories of teachers working in the institutions for the handicapped (i.e., Blinds, Deaf & Dumb, Physically Handicapped and Mentally Retarded) has been under consideration of the Government for sometime. It has been decided to prescribe new scales of pay for these teachers working in the above institutions with immediate effect. The new scales of pay, showing the qualifications prescribed for teachers are as under:-

(1) DEAF AND DUMB INSTITUTIONS

- (a) Trained Graduate Teachers (B.A./B.Sc., B.Ed.) with adequate knowledge in the Education of Deaf and dumb to be certified by the Social Welfare Directorate. B-17
- (b) Untrained Graduate and post-Graduate Teachers (B.A./B.Sc., M.A./M.Sc.) with adequate knowledge in the Education of Deaf and Dumb, to be certified by the Social Welfare Directorate. B-16 These teachers must acquire B.Ed. within a period of three years.
- (c) Trained under-Graduate Teachers (Metric/F.A./etc.) with C.T. or P.T.C. etc. B-14 These teachers must acquire the qualification of B.A./B.Sc./B.Ed. five years as at (a) above.

ATTACHED

Asstt. Director (Litigation)
Social Welfare, SE and WF
Khyber Pakhtunkhwa

(12)

(d) Untrained, under Graduate B-11 Teachers with adequate knowledge of teaching deaf and dumb (to be certified by the Social Welfare Directorate)

These teachers should continue in B-11, till such time they cross the next stages of B-14/16.

(20)

(2) BLINDS INSTITUTIONS:

To be Redesignated as

(a) Trained Graduate Teachers B-17 (B.A./B.Sc., B.Ed.) with adequate knowledge of Braille or teaching the blind (to be certified by the Social Welfare Directorate)

Senior Special Educators Teachers

(b) Un-trained Graduate and post-Graduate Teachers (B.A./B.Sc., M.A./M.Sc.) with adequate knowledge of Braille or teaching the blind (to be certified by the Social Welfare Directorate)

These teachers must acquire B.Ed. within a period of three years.

To be redesignated as Junior Special Educators Teachers

(c) Trained under-Graduate teachers B-14

These teachers must acquire the qualification of B.A. B.Sc., B.Ed. within five years as at (a) above.

- i) B.A., C.T., and proficiency in Braille or adequate knowledge of teaching the blind (to be certified by the Social Welfare Directorate)
- ii) Matric, P.T.C., S.V. and proficiency in Braille or with adequate knowledge of teaching the blind (to be certified by the Social Welfare Directorate)
- iii) Matric with Diploma/Certificate in a trade from a Blind Institute and proficiency in Braille or with adequate knowledge in teaching the blind (to be certified by the S.W. Directorate)

To be redesignated as Assistant Special Educators Teachers

(d) Un-trained, under Graduate Teachers with proficiency in Braille or adequate knowledge of teaching the blind (to be certified by the Social Welfare Directorate)

These teachers should continue in B-11, till such time they cross the next stages of B-14/16.

with existing regulations

(3) MENTALLY RETARDED/PHYSICALLY HANDICAPPED INSTITUTIONS

(a) Trained Graduate Teachers B-17 (B.A./B.Sc., B.Ed.) with adequate knowledge of teaching the mentally retarded and physically disabled (to be certified by the Social Welfare Directorate)

(b) Untrained Graduate and Post-Graduate Teachers (B.A./B.Sc., M.A./M.Sc.) with adequate knowledge of

These teachers must acquire B.Ed. within a period of three years.

Attested

Asstt. Director (Litigation) Social Welfare, SE and WE Knyber Pakhtunkhwa

teaching the mentally
retarded and physically
disabled (to be certified
by the Social Welfare
Directorate.)

(c) Trained Under-Graduate
(P.A./P.S. with C.T./
P.T.C./M.V.) with adequate
knowledge of teaching the
mentally retarded & physically
disabled (to be certified by
the Social Welfare Director-
ate):

(d) Untrained Under-Graduate
Teachers, with adequate
knowledge of teaching the
mentally retarded & physically
disabled (to be certified by
the Social Welfare Director-
ate).

B-14

These teachers must acquire
the qualification of B.A./
B.L. or B.Ed. within five
years as at (a) above.

B-11

These teachers should con-
tinue in B-11, till such
time they reach the next
stages of B-14/16.

All special pays sanctioned for the above categories
of teachers shall be discontinued with immediate effect.

Your obedient servant,



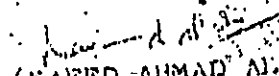
(SAFDAR ALI KHAN)
ADDL. FINANCE SECRETARY-I
GOVERNMENT OF N.W.F.P.

Encl. No. FD(SR-I)1-95/84-III Dated Pesh. the 24th July, 1986

Copy of the above is forwarded to:-

- The Accountant General, N.W.F.P., Peshawar.
- The Director, Social Welfare, N.W.F.P., Peshawar.

3)



(SAEED AHMAD ALVI)
DEPUTY SECRETARY (REGULATION)
FINANCE DEPARTMENT.

Encl. No. FD(SR-I)1-95/84-III. Dated Pesh. the 24th July, 1986.


A copy is also forwarded to:-

- 1) The Secretary to Government of the Punjab,
Finance Department, Lahore.
- 2) The Secretary to Government of Sind,
Finance Department, Karachi.
- 3) The Secretary to Government of Baluchistan,
Finance Department, Quetta.
- 4) The Secretary to Government of West Punjab and East
Finance Department, Muzaffargarh.

(FAKIR ZAMAN)
SECTION OFFICER (SR-I)

ATTESTED



Attested by 

Asstt. Director (Litigation)
Social Welfare, SE and WE
Khyber Pakhtunkhwa

BETTER COPY

No. FD (SR-1)1-95/84-III
GOVERNMENT OF N.W.F.P
FINANCE DEPARTMENT

Dated, Peshawar, the 24th July, 1986

From

Saeed Ulla Jan,
Secretary to
Government of N.W.F.P
Finance Department
Peshawar

To

Secretary to
Government of N.W.F.P
Health And Social Welfare Deptt:
Peshawar.

Subject:

**REVISION OF PAY SCALES OF THE TEACHERS WORKING IN
THE INSTITUTIONS FOR THE HANDICAPPED.**

Sir,

I am directed to refer to the subject noted above and to say that the matter regarding grant of enhanced pay scales to different categories of teachers working in the institutions for the handicapped (i.e. blinds, Deaf & Dumb, Physically Handicapped and Mentally Retarded) has been under consideration of the Govt. for some time. It has been decided to prescribe new scales of pay effect. The new scales of pay showing the qualifications prescribed for teachers are as under.

(1) DEAF AND DUMB INSTITUTIONS

- | | | | |
|-----|--|-------------|--|
| (a) | Trained Graduate Teachers B.A/B.Sc, B.Ed with the adequate Knowledge in the Education of deaf to be certified by the Director Social Welfare Directorate. | B-17 | |
| (b) | Un-trained Graduate and post-graduate Teachers (B.A/B.Sc.M.A/M.Sc) with adequate knowledge in the education of deaf to be certified by the Social Welfare Directorate. | B-16 | These teachers must acquire B.Ed within a period of three years. |
| (c) | Trained under-Graduate Teachers (Matric/F.A/F.Sc) with C.T or PTC Or T.D etc. | B-14 | These teachers must acquire the qualification of B.A/B.Sc/ B.Ed within 5 years as at (a) above. |
| (d) | Untrained, under-graduate Teachers with adequate knowledge of teaching deaf (to be certified by the Social Welfare Directorate). | B-11 | These teachers should continue in B-11, till such time they cross to the next Stage or B-14/16. |

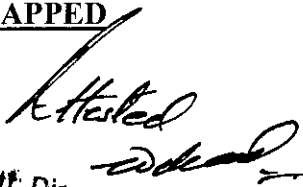
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[Signature]
Asstt: Director (Litigation)
Social Welfare, SE and WE,
Khyber Pakhtunkhwa.

(2) BLIND INSTITUTIONS.

- (a) Trained Graduate Teachers **B-17**
B.A/B.Sc/B.Ed) with adequate Knowledge of Braille or teaching the blind (to be certified by the Social Welfare Directorate).
- (b) Un-trained Graduate and post Graduate teachers (B.A/B.Sc., M.A/M.Sc.) with adequate knowledge Of Braille or teaching the blind (to be certified by the Social Welfare Directorate). **B-16** These teachers must acquire B.Ed within a period of three years.
- (c) Trained under-Graduate Teachers. **B-14** These teachers must acquire the qualification of B.A/B.Sc, B.Ed with in five years as at (a) above).
 - (1) F.A, C.T & proficiency in Braille or adequate knowledge of teaching the blind (to be certified by the Social Welfare Directorate).
 - (2) Matric, P.T.C., S.V., & proficiency in Braille or with adequate knowledge of teaching the blind (to be certified by Social Welfare Directorate).
 - (3) Matric with Diploma/Certificate in a Trade from a Blind Institute and Proficiency in Braille or with adequate Knowledge in teaching the blind (to be certified by the Social Welfare Directorate).
- (d) Un-trained, under-Graduate Teachers **B-11** These teachers should with proficiency in Braille or adequate knowledge of teaching the blind (to be certified by the Social Welfare Directorate). continue in B-11, till such time they cross to the next stages of B-14/16.

(3) MENTALLY RETARDED & PHYSICALLY HANDICAPPED INSTITUTIONS.

- (a) Trained Graduate Teachers **B-17**
B.A./B.Sc.B.Ed.) with adequate Knowledge of teaching the mentally retarded & physically disabled (to be certified by the Social Welfare Directorate).
- (b) Un-trained Graduate and (C.S.T- Graduate Teachers (B.A/B.Sc. M.A/M.Sc) with adequate knowledge of teaching the mentally retarded & physically disabled (to be certified by the Social Welfare Directorate). **B-16** These teachers must acquire B.Ed within a period of three years
- (c) Trained under-Graduate (F.A/ F.Sc C.T/P.T.C/S.V with adequate Knowledge of teaching the mentally Retarded & physically disabled (to be certified by Social Welfare **B-14** These teachers must acquire the qualification of B.A/B.Sc, B.Ed with in 5 years as at (a) above.

Attested

Asstt. Director (Litigation)
Social Welfare. SE and WE,
Knyber Pakhtunkhwa.

Directorate).

- (d) Un-trained under-Graduate Teachers, with adequate Knowledge of teaching the mentally retarded & physically disabled disabled(to be certified by Social Welfare Directorate).
- B-11** These teachers should continue in B-11, till such time they cross to the next stage of B-14/16.

All special pays sanctioned for the above categories of teachers shall be discontinued with immediate effect.

Your Obedient Servant

(SAFDAR ALI KHAN)
ADDL. FINANCE SECRETARY-I
GOVERNMENT OF N.W.F.P

ENDST. NO. FD(SR-1)1-95/84-11, DATED PESHAWAR THE 24TH JULY 1986

COPY OF THE ABOVE IS FORWARDED TO:

1. THE ACCOUNTANT GENERAL NWFP, PESHAWAR.
2. THE DIRECTOR SOCIAL WELFARE NWFP PESHAWAR.
- 3.

(SAEED AHMED ALVI)
DEPUTY SECRETARY
(REGULATION)
FINANCE DEPARTMENT

ENDST: NO. FD (SR-1)1-95/84-III DATED PESHAWAR THE 24TH JULY 1986

A copy is also forwarded to:

- 1) The Secretary to Government of the Punjab Finance Department Lahore.
- 2) The Secretary to Government of the Sindh Finance Department Karachi.
- 3) The Secretary to Government of the Baluchistan Finance Department Quetta.
- 4) The Secretary to Government of Azad Jammu and Kashmir Finance Department, Muzafarabad.




(FAKHAR-UZ-ZAMAN)
SECTION OFFICER (SR-1)

Asst. Director (Litigation)
Social Welfare, SE and WE,
Knyber Pakhtunkhwa

Amex C

14



**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 for 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 for the instant upgradation.
- g. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage equal to the pay in the lower pay scale.
- h. All the concerned Departments will amend their respective service rules to the effect in the prescribed manner.
- i. The above upgradation scheme shall not be applicable to employees of Autonomous Bodies, Semi Autonomous Bodies and Public Sector Companies.

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

Asstt. Director (Litigation)
Social Welfare, SE and WE
Khyber Pakhtunkhwa.

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT**

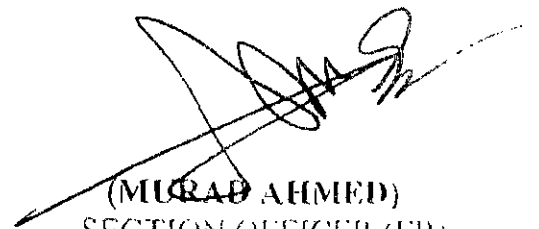
Endst No. & Date even.

Copy of the above is forwarded for information and necessary action to the: -

- 1) PS to Additional Chief Secretary, FATA.
- 2) All Administrative Secretaries Government of Khyber Pakhtunkhwa.
- 3) Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
- 4) Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 5) Secretary to Governor, Khyber Pakhtunkhwa, Peshawar
- 6) Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 7) Secretary Provincial Assembly, Khyber Pakhtunkhwa.
- 8) All Heads of Attached Departments in Khyber Pakhtunkhwa.
- 9) Registrar, Peshawar High Court, Peshawar.
- 10) All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officer Khyber Pakhtunkhwa.
- 11) Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
- 12) Registrar, Service Tribunal Khyber Pakhtunkhwa.
- 13) Secretary to Govt. of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
- 14) The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and Dir Lower Khan.
- 15) The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Mansehra and Dir Lower.
- 16) The Treasury Officer, Peshawar.
- 17) All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
- 18) PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
- 19) PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 20) Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
- 21) PS to Finance Secretary.
- 22) PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department
- 23) All Section Officers/Budget Officers in Finance Department.
- 24) Mr. Jabir Hussain Bangash, President, Class-IV Association, Civil Secretariat, Khyber Pakhtunkhwa Peshawar.
- 25) Mr. Manzoor Khan, President, Civil Secretariat Driver Association Khyber Pakhtunkhwa, Peshawar.
- 26) Mr. Akbar Khan Mohmand, Provincial President, Class-IV Association, Khyber Pakhtunkhwa, Peshawar.



Asstt. Director (Litigation)
Social Welfare, SE and WE
Khyber Pakhtunkhwa


(MURAD AHMED)
SECTION OFFICER (FR)



Government of Khyber Pakhtunkhwa
Social Welfare, Special Education & Women
Empowerment Department

Dated Peshawar the 28-03-2023

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AUTHORITY LETTER

Syed Nabi Gul, Superintendent Litigation Section, Directorate of Social Welfare, Special Education & Women Empowerment Peshawar is hereby authorized to submit para-wise reply /comments in Service Appeal No.84-85 of 2023 Titled Falak Naz Khan & Another V/S Government of Khyber Pakhtunkhwa on behalf of Secretary to Government of Khyber Pakhtunkhwa, Zakat, Usher, Social Welfare, Special Education & Women Empowerment Department.


Section Officer (Lit)

8/5/23