

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mr. Sareer Khan Service Appeal No. 296/2023..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa

Khyber Pakhtunkhwa
Service Tribunal
Duty No. 5331
Date: 16/5/2023

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DEPONENT

CNIC No. 17101-0377128-9

Cell No. 0346-9148582

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mr. Sareer Khan Appeal No. 296/2023..... (Appellant)

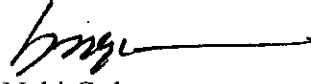
VERSUS

Government of Khyber Pakhtunkhwa

AFFIDAVIT

I, Nabi Gul, Superintendent (BPS-17) Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa Peshawar do hereby solemnly affirm and declare on oath that the contents of the reply on behalf of the respondents are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Tribunal.

DEPONENT



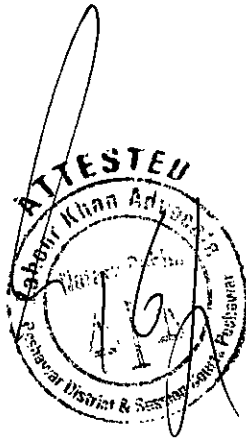
Nabi Gul

Superintendent (BPS-17)

Directorate of Social Welfare, Special Education &
Women Empowerment Khyber Pakhtunkhwa
Peshawar

CNIC # 17101-0377128-9

Identified by:



2

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 296/2023

Mr. Sareer Khan, Social Welfare Officer BPS-17 Social Welfare, Special Education, & Women Empowerment, Department, Directorate of Special Education, Peshawar. **Appellant**

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. The Secretary Social Welfare, Special Education and Women Empowerment Department, Khyber Pakhtunkhwa Civil Secretariat Peshawar.
3. The Director Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa Peshawar.

..... **Respondents**

PARA-WISE COMMENTS BY RESPONDENTS NO. 1 TO 3.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. The appellant has got no cause of action
2. The appeal is not maintainable in its present form.
3. The appeal is based on mala fide intentions.
4. The appellant has no locus standi.
5. The appellant has not come to Honorable Tribunal with clean hands.
6. The appellant has concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
7. The appeal is liable to be dismissed for mis-joinder and non-joinder of necessary parties.
8. The appeal is against the prevailing law & rules.

FACTS

1. Pertains to record.
2. Pertains to record.
3. Pertains to record.
4. Pertains to record.


5. Correct to the extent that the respondent department prepared working paper as evident from (Annex-G & H) of service appeal. It is pertinent to mention here that the appellant had initially been appointed on project side. On completion of the project life, and accordingly his services were terminated as per project policy. Feeling aggrieved the appellant filed Writ Petition in the Honorable Peshawar High Court Peshawar which was disposed of in favor of appellant and in compliance his services were re-instated provisionally subject to the fate of CPLA filed in the Apex Court vide order dated 22.11.2016 (Annex-A) and on the arrival of the decision of the August Court in the CPLA, the appellant was finally re-instated vide order dated 03.02.2020 (Annex-B). Since before the final re-instatement of the appellant the said working paper stood invalid. Hence, the only reason for non-consideration of the promotion of the appellant is judgment of the August Court dated 04.11.2019 and framing of new service rules.
6. Pertains to record.
7. Incorrect, hence denied. The respondent department has implemented the judgment dated 22.02.2022 of the Honorable Service Tribunal Peshawar in letter and spirit.
8. Incorrect, hence denied. The respondents implemented the judgment dated 22.02.2022 of the Honorable Service Tribunal Peshawar in letter and spirit after completing all codal formalities following the rules and regulation as mentioned in the Esta Code Page No 58 that "promotion will always be notified with immediate effect" (Annex-C). Furthermore aggrieved from the judgment dated 22.02.2022, the respondents have filed CPLA in the Apex Court and have also requested for early hearing in CPLA No. 449-P/2022 and transfer of case to principle seat at Islamabad (Annex-D).
9. Incorrect, hence denied. The factual position has been explained in the preceding para.
10. Incorrect, hence denied. The appellant has no cause of action to file the instant service appeal.

REPLY ON GROUNDS:-

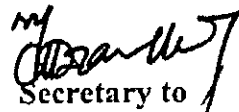
- A. Incorrect, hence denied. The appellant has been treated in accordance with law and respondents have acted in accordance with Esta Code as explained in the preceding paras.
- B. Incorrect, hence denied. The respondents are law abiding civil servants and have not been violated any Article of the Constitution of Islamic Republic of Pakistan.
- C. Incorrect, hence denied. The factual position has been explained in the preceding paras.

- D. Incorrect, hence denied. No discrimination has been made with the appellant. He has been promoted as per law as explained in the preceding paras.
- E. Incorrect, hence denied. The factual position has been explained in the preceding paras.
- F. Incorrect hence denied. As explained in paras ibid.
- G. Any other ground deem appropriate, shall be raised during the arguments with permission of this Hon'ble Tribunal.

It is therefore humbly prayed that the instant appeal may graciously be dismissed with cost.



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



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



Director
Social Welfare, Special Education & Women
Empowerment, Peshawar
(Respondent No. 3)

Annex A

57



Government of Khyber Pakhtunkhwa
Directorate of Social Welfare Special Education
& Women Empowerment
Janrud Road
Peshawar

Peshawar the 22nd Nov, 2016.

OFFICE ORDER

No. G-10/54/DSW/2016/18979-19005. In pursuance of the decision of the honorable Supreme Court of Pakistan in Civil Appeal No. 1-P/2013 dated 24/02/2016 (WP.2510-P/2015) and Administrative Department Notification No. SO. II (SWD) II-198/2015/PC/1220-26 dated 16/11/2016, the following Ex-Project Employee of School for Deaf Children, Takhtbai District Mardan, Government School for Hearing, Impaired Children, Munda District Dir Lower and Centre for Mentally & Physically Retarded Children, Dir Upper are here by provisionally reinstated from the date of their assumption of charge of the posts.

S. No	Name	Designation with BPS	Proposed Post, BPS and station
1.	M. Ibrahim	SCV (B-16)	SCV (B-16) Deaf School Takhtbai District Mardan.
2.	Jusaid Khan	Junior Clerk	Junior Clerk (B-11) Deaf School, Munda Dir Lower
3.	Ghalib Khan	Driver	Driver BPS-5 Deaf School Takhtbai District Mardan.
4.	Muhammad Raziq	Naib Qasid	Naib Qasid (B-3) Deaf School Takhtbai District Mardan.
5.	Shahid Khan	Chowkidar	Chowkidar (B-3) Deaf School Takhtbai District Mardan.
6.	Nisar Ahmad	SCV	SCV (B-16) HIC Munda D/L
7.	Hayat Ullah	SOM	SOM (B-11) HIC, Munda D/L
8.	Gul Muhammad	Driver	Driver (B-5) HIC, Munda D/L
9.	Imtiaz Ahmad	Naib Qasid	Naib Qasid (B-3) HIC Munda Dir Lower
10.	Rehman Ullah	Chowkidar	Chowkidar (B-3) HIC Munda Dir Lower
11.	Kazal ur Rehman	Project Manager	Manager (B-16) MRPH, Dir Upper
12.	Juzgal Shah	SCV	SCV (B-16) MRPH, Dir Upper
13.	Shah Muhammad	Chowkidar	Chowkidar (B-3) MRPH, Dir Upper
14.	Naziat	Religious Teacher	Religious Teacher (B-7) MRPH, Dir Upper
15.	Bilal Ahmad	Junior Clerk	Junior Clerk (B-11) MRPH, Dir Upper
16.	Nasrullah	Driver	Driver (B-5) MRPH, Dir Upper
17.	Gul Hakim	Naib Qasid	Naib Qasid (B-3) MRPH, Dir Upper

2. The above officials are directed to report for duty to Principals /DO (SW) concerned on or before 25/11/2016. The provisional reinstatement is subjected to the fate of the CPLAs/Review Petition pending in the Supreme Court of Pakistan.

Sd/-
Director (SWSE&WE)
Khyber Pakhtunkhwa

Copy for information to:-

1. District Accounts Officer, Mardan, Dir Lower and Dir Upper.
2. PS to Secretary (SW).
3. DO (SW) Mardan, Dir Lower & Dir Upper.
4. Official concerned.
5. PA to DSW.
6. Office Copy.

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

[Signature]
22/11/2016
(MUIHAMMAD RAUF)
Assistant Director (Estab)

BETTER COPY



**GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL EDUCATION
& WOMEN EMPOWERMENT, OPPOSITE ISLAMIA
COLLEGE JAMRUD ROAD, PESHAWAR**

Peshawar the 22nd Nov, 2016.

NOTIFICATION:

No. E-18/5/DSW/2016/18979-19005. In pursuance of the decision of the honorable supreme court of Pakistan in Civil Appeal No. 1-p/2013 dated 24-02-2016 (WP.2510-P/2015) and Administrative Department Notification No. So-II (SWD 11-198/2015/PC/1220-26 dated 16/11/2016, the following Ex-Project Employees of School for Deaf Children Takhtbai District Mardan, Government School for Hearing Impaired Children, Munda District Dir Lower and Centre for Mentally & Physically Retarded Children, Dir Upper are here by Provisionally reinstated from the date of their assumption of charge of the posts.

S. No	Name	Designation with BPS	Proposes Post, BPS and station
1	M. Ibrahim	SCW (B-16)	SCW (B-16) Deaf School Takhtbai District Mardan.
2	Junaid Khan	Junior Clerk	Junior Clerk (B-11) Deaf School Takhtbai District Mardan.
3	Ghalib Khan	Driver	Driver (B-5) Deaf School Takhtbai District Mardan.
4	Muhammad Raziq	Naib Qasid	Naib Qasid (B-3) Deaf School Takhtbai District Mardan.
5	Shahid Khan	Chowkidar	Chowkidar (B-3) Deaf School Takhtbai District Mardan.
6	Nisar Ahmad	SCW	SCW (B-16) HIC Munda Dir Lower
7	Hayat Ullah	SOM	SOM (B-11) HIC Munda Dir Lower
8	Gul Muhammad	Driver	Driver (B-5) HIC Munda Dir Lower
9	Imtiaz Ahmad	Naib Qasid	Naib Qasid (B-3) HIC Munda Dir Lower
10	Rehman Ullah	Chowkidar	Chowkidar (B-3) HIC Munda Dir Lower
11	Fazal ur Rehman	Project Manager	Manager (B-16) MRPH, Dir Lower
12	Jamal Shah	SCW	SCW (B-16) MRPH, Dir Lower
13	Shad Muhammad	Chowkidar	Chowkidar (B-3) MRPH, Dir Lower
14	Naziat	Religious Teacher	Religious Teacher (B-7) MRPH, Dir Lower
15	Bilal Ahmad	Junior Clerk	Junior Clerk (B-11) MRPH, Dir Lower
16	Nasrullah	Driver	Driver (B-5) MRPH, Dir Lower
17	Gul Hakim	Naib Qasid	Naib Qasid (B-3) MRPH, Dir Lower

The above officials directed to report for duty to Principals/DO (SW) concerned on or before 25-11-2016. The provisional reinstatement is subjected to the fate of the CPLAs/Review Petitions pending on the Supreme Court of Pakistan.

-Sd-
Director
Social Welfare & Women Dev:
Khyber Pakhtunkhwa

Copy to:-

1. The District Account Officers, Mardan, Dir Lower and Dir Upper
2. PS to Secretary (SW)
3. DO (SW) Mardan, Dir Lower & Dir Upper
4. The Official concerned.
5. PA to DSW
6. Office Copy

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

(MUHAMMAD RAUF)
Assistant Director (Estab)

Annex B 7

69 F

TO BE SUBSTITUTED BEARING THE SAME NO. & DATE

Government of Khyber Pakhtunkhwa
 Directorate of Social Welfare, Special Education and
 Women Empowerment Jamrud Road Peshawar

Dated Peshawar the 03/02/2020

ORDER:

No. E-18/54/DSW/2020/3521-31 In compliance with the judgment dated 17.03.2016 of the Peshawar High Court Peshawar in Writ Petition No. 2510-P/2015 titled "Muhammad Ibrahim & others VS Government of Khyber Pakhtunkhwa and judgment dated 04.11.2019 of the Supreme Court of Pakistan in Civil Petition No. 355-P/2016 titled "Government of Khyber Pakhtunkhwa VS Muhammad Ibrahim & Others" and in supersession of this Directorate's Order No. E-18/54/DSW/2016/18979-19005 dated 22.11.2016, the employees of the following Institutions are hereby re-instated and adjusted against the vacant posts mentioned against their names w.e.f 01.07.2015:

S.No	Name	Designation	Adjusted as
1	Mr. Muhammad Ibrahim	Social Case Worker (BPS-16)	<u>Social Case Worker (BPS-16)</u> in Govt. School for Deaf Children Swabi.
2	Mr. Junaid Khan	Junior Clerk (BPS-11)	<u>Junior Clerk (BPS-11)</u> Govt. School for Deaf Children Takht Bhai Mardan
3	Mr. Ghalib Khan	Driver (BPS-5)	<u>Driver (BPS-5)</u> Govt. School for Deaf Children Takht Bhai Mardan
4	Mr. Muhammad Raziq	Naib Qasid (BPS-3)	<u>Naib Qasid (BPS-3)</u> Govt. School for Deaf Children Takht Bhai Mardan
5	Mr. Shahid Khan	Chowkidar (BPS-3)	<u>Chowkidar (BPS-3)</u> Darul Aman Mardan
6	Mr. Nisar Ahmad	Social Case Worker (BPS-16)	<u>Social Case Worker (BPS-16)</u> Govt. School for Deaf Children Timergara Dir Lower
7	Mr. Hayatullah	Senior Oral Master	<u>Senior Oral Master (BPS-11)</u> Govt. School for Deaf Children Munda Dir Lower
8	Mr. Gul Muhammad	Driver	<u>Driver (BPS-5)</u> Govt. School for Deaf Children Munda Dir Lower
9	Mr. Imtiaz Ahmad	Naib Qasid	<u>Naib Qasid (BPS-3)</u> Govt. School for Deaf Children Munda Dir Lower
10	Mr. Rahmanullah	Chowkidar	<u>Chowkidar (BPS-3)</u> Govt. School for Deaf Children Munda Dir Lower
11	Mr. Fazal ur Rahman	Project Manager	<u>Manager (BPS-16)</u> MR & PHC Dir Upper
12	Mr. Jamal Shah	Social Case Worker	<u>Social Case Worker (BPS-16)</u> Artificial Limbs Workshop Peshawar
13	Mr. Shad Muhammad	Chowkidar	<u>Chowkidar (BPS-3)</u> MR & PHC Dir Upper
14	Mst: Naziat	Religious Teacher	<u>Religious Teacher (BPS-7)</u> Govt. School for Deaf Children Munda Dir Lower
15	Mr. Bilal Ahmad	Junior Clerk	<u>Junior Clerk (BPS-11)</u> MR & PHC Dir Upper
16	Mr. Nasrullah	Driver	<u>Driver (BPS-5)</u> MR & PHC Dir Upper
17	Mr. Gul Hakim	Naib Qasid	<u>Naib Qasid (BPS-3)</u> MR & PHC Dir Upper

2. The intervening period w.e.f 01.07.2015 to 17.03.2016 shall be treated as leave without pay.

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

(PTO)

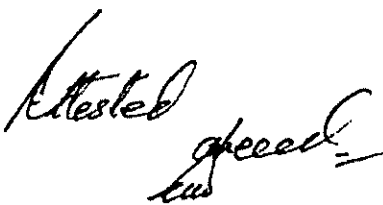
3. The re-instatement shall be subject to the judgment of the Honorable Supreme Court of Pakistan in review petition filed by the Government of Khyber Pakhtunkhwa Social Welfare, Special Education & Women Empowerment Department.

Sd/-
Director
(SW, SE & WE)

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officers, Mardan, Dir Lower, Swabi & Dir Upper.
3. Section Officer (Lit) Social Welfare, SE & WE Khyber Pakhtunkhwa.
4. The Assistant Directors (Litigation) & (Estab-II) Directorate of Social Welfare.
5. Manager, Artificial Limbs Workshop Peshawar.
6. District Officers, Social Welfare Mardan, Dir Lower, Swabi & Dir Upper
7. Superintendent, Darul Aman Mardan.
8. Govt. School for Deaf Children Swabi C/O District Officer (SW) Swabi
9. Social Case Worker, Govt. School for Deaf Children Takht Bhai Mardan.
10. Social Case Worker, Govt. School for Deaf Children Munda Dir Lower.
11. Manager, Center for Mentally Retarded & Physically Handicapped Children Dir Upper.
12. PA to Director (SW)
13. Officials concerned.


Assistant Director
(Establishment-I)


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

within a period of six months from such recommendations, they would lapse. The case of such civil servant would require placement before the PSB/DPC afresh.

VI. Date of Promotion:

Promotion will always be notified with immediate effect.

VII. Notional Promotion:

In respect of civil servants who retire (or expire) after recommendation of their promotion by the PSB/DPC, but before its approval by the competent authority, their promotion shall be deemed to have taken effect from the date of recommendation of the PSB/DPC, as the case may be, and their pension shall be calculated as per pay which they would have received had they not retired/expired.


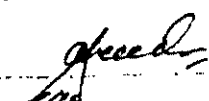
VIII. Promotion of Civil Servants who are awarded minor penalties.

- (a) The question of promotion to BS-18 and above in case of civil servants who have been awarded minor penalties has been settled by the adoption of quantification of PERs and CEI which allows consideration of such cases for promotion subject to deduction of 5 marks for each major penalty, 3 marks for each minor penalty and 1 mark for each adverse PER from the quantified score and recommendation for promotion on attaining the relevant qualifying threshold.
- (b) However, the CEI policy is not applicable to civil servants in BS-16 and below. In this case, the concerned assessing authorities will take into consideration the entire service record with weightage to be given for recent reports and any minor penalty will not be a bar to promotion of such a civil servant.

IX. Promotion in case of pending investigations by NAB:

If there are any NAB investigations being conducted against an officer, the fact of such investigations needs to be placed before the relevant promotion fora which may take a considered decision on merits of the case.

2. All the existing instructions on the subject shall stand superseded to the above extent, with immediate effect.



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

Annex D

60

Related to Jamal Shah case.



IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

Case No. CILA No. 449-P/2022.

Title: Govt. of Khyber Pakhtunkhwa through Chief Secretary and others Versus Mr. Jamal Shah

SUBJECT: APPLICATION FOR EARLY HEARING & TRANSFER OF CASE TO PRINCIPAL SEAT AT ISLAMABAD

CATEGORY OF CASE: Service Matter/ challenging the amendment in Rules of 2006 to the effect of of the post of Social Case Worker

BRIEF OF CASE (FROM TRIAL COURT TO IMPUGNED ORDER):-

Nature of Proceeding before lower Court:- (Execution Petition) before the Hon'ble Khyber Pakhtunkhwa Service Tribunal, Peshawar directed the petitioners for implementation of the judgment and order dated 02-02-2022 which is impugned before this august Court in CPLA No. 449-P/2022.

Relief claimed in main case. Suspension of the Impugned Judgment & Order dated 02-02-2022 passed in Service appeal No. 666/2020.

GROUND/ REASON OF URGENCY:

1. Respondent filed Execution Petition No. 274/2022 before the Hon'ble Khyber Pakhtunkhwa Service Tribunal, Peshawar for implementation of impugned order dated 02-02-2022. Title page of Execution Petition and order sheet dated 20-07-2022 are enclosed.
2. Hon'ble Khyber Pakhtunkhwa Service Tribunal, Peshawar put on notice the petitioners and directed the petitioners for submission of implementation report of the judgment dated 02-02-2022 passed in Service appeal No. 666/2020 on the next date i.e. 18-08-2022.

PROOF OF URGENCY:

(Attached/ Not attached)

PRAYER:

It is respectfully prayed that the Petition may kindly be Transferred to the Principal seat at Islamabad and may kindly be fixed in the 2nd Week of August, 2022.

UNDERTAKING:

Certified that this is 1st application by the AOR/Applicant for early fixation of instant case.

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

Mian Saad Ullah Jandoli
(Mian Saad Ullah Jandoli)
Advocate-on-Record
Supreme Court of Pakistan
For the Government of KP

BETTER COPY



IN THE SUPREME COURT OF PAKISTAN
(Appellate jurisdiction)

Case No. CPLA No. 449-P/2022.

Title: Govt of Khyber Pakhtunkhwa through Chief Secretary and others Versus Mr. Jamal Shah.

Subject: **APPLICATION FOR EARLY HEARING & TRANSFER OF CASE TO PRINCIPAL SEAT AT ISLAMABAD.**

Category of Case: Service Matter/challenging the amendment in Rules of 2006 to the extent of the post of Social Case Worker.

BRIEF OF CASE (FROM TRIAL COURT TO IMPUGNED ORDER):-

Nature of Proceeding before lower Court: - (Execution Petition) before the Hon'ble Khyber Pakhtunkhwa Service Tribunal, Peshawar directed the petitioners for implementation of the judgment and order dated 02-02-2022 which is impugned before this august Court in CPLA No. 449-P/2022,

Relief claimed in main case. Suspension of the impugned judgment & Order Dated 02.02.2022 passed in Service appeal No. 666/2020.

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PROOF OF UGENCY: (Attached/ Not attached)

PRAYER:

It is respectfully prayed that the Petition may kindly be transferred to the Principal seat at Islamabad and may kindly be fixed in the 2nd Week of August, 2022

Copy to:-

UNDERTAKING:

Certified that this is 1st application by the AOR/Applicant for early fixation of instant case.

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

(Mian Saad Ullah Jandoli)
Advocate-on-Record
Supreme Court of Pakistan
For the Government of KP



(12)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL
EDUCATION & WOMEN EMPOWERMENT, OPPOSITE
ISLAMIA COLLEGE JAMRUD ROAD, PESHAWAR.**

No. DSW/Lit/2-45 395
Dated the Peshawar 09/09/2023

AUTHORITY LETTER

Mr. Nabi Gul, Superintendent (BPS-17) Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa Peshawar is hereby authorized to submit reply on behalf of Respondent No. 3 in Service Appeal No. 294 to 297/ 2023 titled Mr. Jamal Shah **VERSUS** Govt of Khyber Pakhtunkhwa in the Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar. He is also authorized to attest the affidavit on behalf of respondents and attend the Honorable Court on each date of hearing.

DIRECTOR
Social Welfare, Special Education &
Women Empowerment
Khyber Pakhtunkhwa
(Respondent No. 3)