

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mr. Ali Subhan Service Appeal No. 1411/2022..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa

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DEPONENT
CNIC No. 17101-0377128-9
Cell No. 0346-9148582

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Mr. Ali Subhan Appeal No. 1411..... (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.

*It is further stated on oath that
in this appeal, the Assisting
have neither been placed
ex-party nor their defence
has been struck off.*

DEPONENT



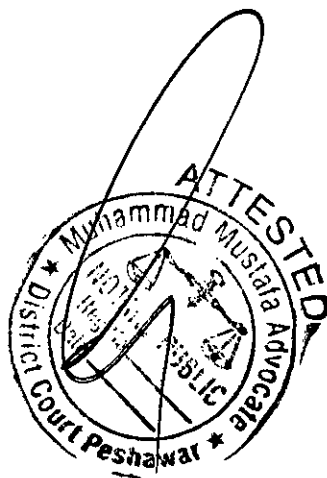
Nabi Gul

Superintendent (BPS-17)

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

CNIC # 17101-0377128-9

Identified by:



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7416
Dated 11/09/23

Service appeal No. 1411/2022

Ali Subhan.....Appellant

VERSUS

1. Govt of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat Peshawar.
2. Govt of Khyber Pakhtunkhwa through, Secretary Social Welfare, Special Education & Women Empowerment Department.
3. Secretary, Govt of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat Peshawar.....Respondents

PRELIMINARY OBJECTIONS:

1. The appellant has got no cause of action to file the instant service appeal.
2. The appeal is not maintainable in its present form.
3. The appeal is based on malafide intentions.
4. The appellant has no locus standi.
5. The appeal in hand is badly time barred.
6. The appellant has not come to Honorable Tribunal with clean hands.
7. The appellant has concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
8. The appeal is liable to be dismissed for non-joinder/misjoinder necessary parties.
9. The appeal is against the prevailing law & rules.
10. That the respondents department implemented the judgment dated 06.11.2019 of the Honorable Peshawar High Court, Peshawar in WP No. 2580-P/2018 titled "Musharaf Khan etc VS Govt etc" in letter and spirit, therefore under Section-11 of CPC, the case of the appellant come under Res Judicata and not maintainable.

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

Respectfully Sheweth,

FACTS:

1. Pertain to record.
2. Pertain to record.
3. Incorrect, hence denied. The petitioner has concealed the fact by annexing the irrelevant PC-1 vide Annexure-C. According to the revised PC-I (Annexure-A) the post of Religious / Theology Teacher was created in BPS-16 and consequent upon conversion of

the scheme to regular budget side w.e.f 01.07.2008 the post was created in BPS-9. The reasons was that the petitioner was receiving higher salary for the same job under ADP scheme, but these jobs were temporarily and had no other benefit such as pension, up-gradation and increase in salary, while petitioner on regularization is entitled for all the service benefits as allowed to respective civil servants of the Province. Furthermore creation of the post of Religious / Theology Teacher in (BPS-09) by the Govt was fortunate for the petitioner as in case the same post was created in BPS-16, then the Erstwhile District Coordination Officer had no powers to regularize / appoint an official in BPS-16 due to the reasons that appointment against the post of BPS-16 comes under the purview of Khyber Pakhtunkhwa Public Service Commission. The petitioner got himself regularized in BPS-09, assumed the charge against the post of Religious / Theology Teacher in BPS-09 (**Annexure-B**) and after seeking / securing safe side regarding his regularization, the appellant filed Writ Petition No. 2580-P/2018 titled "Musharaf Khan etc" VS Govt" which was disposed of on 06.11.2019. The relevant Paragraph 12 is re-produced as under:

"Therefore, for the reasons mentioned here in above, this writ petition is disposed of in term that respondents shall treat petitioners with the same yard stick, which had applied to other employees of the same department and, cases of petitioners shall also be considered for up-gradation of their posts with similar posts in other department, keeping in view their job description, nomenclature and qualification"

In pursuance to the decision of the Honorable Peshawar High Court, Peshawar judgment dated 06.11.2019, the respondent department up-graded the incumbents to BPS-16 with immediate effect as per the analogy of the posts of Instructor (BPS-11) to (BPS-14). The Petitioner again assumed the charge of the post of Religious Teacher in BPS-16 with immediate effect neither feeling aggrieved nor submitted any departmental appeal for back benefits etc. After the lapse of approximately three years period the petitioner again knocked the door of this Honorable Tribunal which is badly time barred, not maintainable and seeks remedies for same relief from various Courts which

tantamount to mislead these Honorable Courts. Therefore, claim of the petitioner regarding creation of the post in BPS-09 is totally baseless, malafide and against the facts.

4. Incorrect, hence denied. The factual position has been explained in the preceding paras.
5. The factual position has been explained in Para-3 above.
6. Correct to the extent that the petitioner had filed departmental appeal for grant of BPS-16 w.e.f 01.07.2008 with all back benefits. In this regard the appeal was not considered due to the reasons that his due rights have been granted to him and he is no more entitled for such relief. The factual position has been explained in Para-3 above.
7. Incorrect, hence denied. The factual position has been explained in the preceding paras.

GROUND:

- A. Incorrect, hence denied. The respondent's action is according to law and within lawful authority.
- B. Incorrect, hence denied. No mandatory provisions of law and rules have been badly violated by the respondents nor the appellant had not been treated against the law nor have his due rights been violated.
- C. Incorrect, hence denied. The factual position has been explained in the preceding paras.
- D. Incorrect, hence denied. Claim against the service rules, 2008 regarding Religious Teacher in (BPS-16) is totally un-justified, unlawful and against the facts. As the factual position has been explained in the preceding paras.
- E. Incorrect, hence denied. Miss Balqees was initially appointed as Religious Teacher in the ADP scheme titled "Establishment of Darul Aman Swat @ Rs. 8,000/0 PM. On conversion of the said scheme to revenue side her services were terminated w.e.f 30.06.2007 as per policy. So far as regularization of services of the employees of the other projects (converted to regular side), it is humbly prayed they were appointed against the newly created posts in BPS-1 to BPS-15 in a regular manner by the competent authority i.e. erstwhile District Coordination Officer. While the case of Miss. Balqees Religious Teacher was under the purview of Public Service Commission as the said post was created by Finance Department in BPS-16. Miss Balqees filed Writ Petition No.

361/2010 titled "Balqees Ex-Theology Teacher VS Province of NWFP & Others" with the pray to re-instate her against the said post under Civil Servants (Amendment) Act 2005 and the Honorable Peshawar High Court Peshawar allowed the writ petition as prayed for and the respondent department in compliance implemented the judgment in letter and spirit. Aim of explaining appointment of Miss. Balqees as Religious Teacher (BP-16) was that she was re-instated in her services due to the fact that on conversion of the scheme from ADP to regular budget side, the post of Religious Teacher was created in BPS-16, therefore claim of the petitioner considering his case at par with the case of Miss. Balqees is totally false, unlawful and against the facts as his post was created / sanctioned in BPS-09 by the Finance Department.

F. Incorrect, hence denied. Ms. Javeria Zaman was initially appointed as Religious Teacher (BPS-09) in Special Education Institution (Center for Mentally Retarded & Physically Handicapped Children, Haripur (ADP scheme) and later on conversion of the said scheme to the revenue side as per Finance Department letter dated 22.05.2004, the services of the Ms. Javeria Zaman was regularized in BPS-09 w.e.f 01.07.2004. As far as her BPS-17 as Religious Teacher is concerned, in this connection it is stated that this Honorable Tribunal vide judgment dated 11.11.2010 passed in Appeal No. 1396/2010 titled "Mrs. Javeria Zaman (Religious Teacher VS Secretary to Govt. of Khyber Pakhtunkhwa, Social Welfare, Special Education & Women Empowerment & Other" allowed the service appeal and as admissible under the Finance Department circular letter No. FD (SR-1)/1-95/84-III, dated 24.07.1986 (copy at Annexure-C) and accordingly the Court order was implemented (Annexure-D). The grant of BPS-17 has been treated as personal to her and shall not confer any right on her to claim seniority over her elsewhere seniors in the normal course of application. Keeping in view the above facts, claim of the appellant is totally false, unlawful and unjustifiable.

G. Incorrect, hence denied. The post of Religious / Theology Teacher in BPS-15 & 16 in Education Department Khyber Pakhtunkhwa cannot be brought at par with the posts Religious Teachers in Social Welfare Department Khyber Pakhtunkhwa. The posts of Religious Teachers in Welfare Homes in Social Welfare Department Khyber


Pakhtunkhwa have been created keeping in view the necessity / requirement. Welfare Homes have been established with minimum staff positions as only 25 – 30 orphans / destitute children are imparting vocational / normal education up to primary level in each Welfare Home. The Education Department Khyber Pakhtunkhwa has a vast field of teaching to hundreds of children in a single entity / institute.


- H. Incorrect, hence denied. Factual position has been explained in the preceding paras.
- I. Incorrect, hence denied. Factual position has been explained in the preceding paras.
- J. Incorrect, hence denied. The respondent department has granted each and every facility to the appellants and has implemented the judgments of the Honorable Courts in letter and spirit.
- K. Incorrect, hence denied. The appellant was appointed as Religious Teacher in ADP scheme and later on regularized in the same entity and still drawing his salary etc from Welfare Home for Child Beggars Peshawar. As far claim of the petitioner regarding his duties in Special Education Institution, in this regard it is stated that Welfare Home for Child Beggars Peshawar is temporarily closed due to some administrative issues and all the staff have been deputed to various Institutions of Social Welfare Department Peshawar on attachment basis till further orders. Therefore claim of the petitioner in the sense of teacher of Special Education Institution is tally false, illegal and against the facts.
- L. Incorrect, hence denied. The appellant has not been discriminated with respect to fundamental rights guaranteed in constitution and law of land.
- M. Pertain to record.
- N. The respondents also seek permission of the Honorable Tribunal for further / additional grounds at the time of arguments.


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In view of the above clarifications/explanations, it is therefore humbly prayed that the instant appeal may be dismissed having no weight and being based on malafide intention as the appellants have concealed the facts of the case to misguide this honorable Tribunal.


Chief Secretary, Govt of Khyber
Pakhtunkhwa
(Respondent No. 1)


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


Government of Khyber Pakhtunkhwa
✓ Finance Department
(Respondent No. 3)

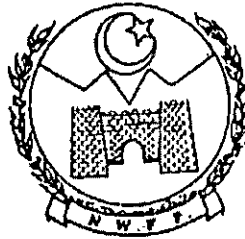
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ESTABLISHMENT OF WELFARE HOME FOR MALE CHILDREN
BEGGARS AT PESHAWAR

REVISED PC-1

PERIOD 1ST JULY 2004 – 30 JUNE 2008



COST
REVISED COST

RS. 4.621 MILLION
RS. 7.823 MILLION

GOVERNMENT OF NWFP
SOCIAL WELFARE AND WOMEN DEVELOPMENT DEPARTMENT

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

W HENRY PAK

ADP Number (347) 40095

PART 'A'

PROJECT DIGEST

1	Name of Project	Establishment of Welfare Home for Male Children Beggars Peshawar.
2	Authorities responsible for.	
	i. Sponsoring Agency	Government of N.W.F.P. ZU, SW & WDD, NWFP.
	ii. Executing Agency	ZU, SW & WDD, NWFP through Directorate of SW&WDD NWFP
	iii. Operation & Maintenance	Directorate of SW&WDD NWFP
3	Time required for completion of project	48 Months
	i. Commencement	01.07.2004
	ii. Completion	30.06.2008
4	Plan Provision	
	i). If the project is included in the current five year plan specify actual allocation	The scheme has been included in the Provincial ADP 2006-2007 at ADP code No.40095 with an allocation of Rs.1.775 million. However the requirements as per details cost statements is Rs. 2.230 millions for the Financial year 2006-07.
	ii) If not included in the current plan how is it now proposed to be accommodated (Inter/Intra-Sectoral adjustment or other sources may be indicated)	NA
	iii) If the project is proposed to be financed out of block provision for a programme indicates.	NA
	iv. For each project a statement showing plan allocation and impact of the project being submitted for approval on the Sectoral portfolio should be given:	NA

b) if the project is not in the plan what warrants its inclusion in the plan	The scheme falls in the purview of the objective of the social sector and has been included due to need of the community as well as in compliance to the instructions of Chief Secretary, NWFP.
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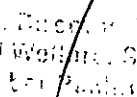
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Asstt: Director (Litigation)
Social Welfare, SE and WE,
Knyber Pakhtunkhwa.

5	<p>Relationship of the project with the objectives of the sector-Indicate the contribution of the project , quantified if possible , to the targets in the five year plan, and names of other project (whether sanctioned or under preparation) which should form part of an integrated programme within the sector</p>	<p>The Department of Social Welfare is concerned to focus with well-being and uplift of the community in general and vulnerable groups in particular. The department acts as a catalyst agent for achieving the goal of social stability in the society leading to create social climate conducive for socio economic development.</p> <p>The Beggary has emerged as a big menace in the country particularly in the NWFP. Everywhere, one can see the plight of child beggars in the bazaars, bus stands, streets and in front of mosques soliciting charity. Some of them do not miss the opportunity of theft. Hence this stigma needs to be tackled with iron hands and on emergent basis, by all faction of the society not only by the Government concerned functionaries. Efforts are required to be made to prevent child beggary at community level. These practices will surely required coordinated efforts of concerned agencies i.e. local police, local administration, community organizations for searching/rounding up the beggars and Social Welfare Department for their Rehabilitation and follow-up.</p>
6	<p>Capital Cost of the Project</p>	<p>Rs. 7.823 Million</p>
	<p>i. Local cost</p>	<p>Rs. 7.823 Million</p>
	<p>ii. Foreign Exchange cost</p>	<p>Nil</p>
	<p>iii. Exchange rate adjustment , if any on the basis of latest information:</p>	<p>NA</p>
	<p>Total</p>	<p>Rs. 7.823 Million</p>
7	<p>Annual recurring expenditure after completion:</p>	<p>2.230</p>
	<p>Local</p>	<p>2.230</p>
	<p>F.E</p>	<p>NA</p>
	<p>Total</p>	<p>2.230</p>
8	<p>Objectives of the project preferably in quantitative terms:</p>	<p>District Peshawar is facing today problem of beggary. Beggars male children as well as female children are usually seen in the parks , streets, and other general public places soliciting alms, have created a bad image for our country and our own people especially on foreigners but has also created numerous problems for the general public. Beggary being a flourishing profession especially child beggary the number of child beggars is increasing</p>

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

	<p>with the passage of time being as easily profession .The project main objective is to pick-up these beggars from the bazaars , streets etc and bring them in the welfare home, provide vocational and skill training to these children beggars/ vagrants in the rehabilitation centres and make them aware about the evils of beggary and benefit of education and skills training .</p>
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Asst. Director, Investigation,
Social Welfare, SC and WE,
Krayen, Poonchkiwa

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M. Riaz Sani

Prepared by:

(M. RIAZ-UL-HAQ SANI)
PLANNING OFFICER
DIRECTORATE OF SW & WDD

Checked by:

Fakhrul Islam
(DR. FAKHRUL ISLAM)
DIRECTOR,
SOCIAL WELFARE & WDD NWFP.

Approved by:

Sultan Mehmood Khattak
(SULTAN MEHMOOD KHATTAK)
SECRETARY
NAT. USHR, SOCIAL WELFARE &
WOMEN DEV: DEPARTMENT.

Dated _____

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

PART- "B"

PROJECT DESCRIPTION AND FINANCING

8	Location of Project.	District Peshawar
	a) Give name of Project and administrative district in which the service centre will be located.	Welfare Home for Children Beggars District Peshawar
	b) Indicate total Area which will be served.	District Peshawar
	c) Environment Aspect	NA
9	Existing facilities:-	NA
10	Description and Justification of the Project	
	a) Give brief history, proposed facilities and justification of the project.	Beggary is a complicated psychological and socio-economic problem the root cause of which is that substantial portion of our population is socially and economically handicapped. They have reached the stage of social degradation which is not only detrimental for the individual concerned, but also constitute a social stigma for the society. The reason of beggars is symptoms of poverty development unequal distribution of wealth, deviation from Islamic injunctions social injustice, lack of social awareness and population explosion. That is why countless beggars have encircled the entire province. The child beggars are generally seen in the streets bazaars roads and outside masques instead of schools of educate themselves. Eradication of beggary is responsibility of the provincial government and to that end a comprehensive legislation entitled West Pakistan Vagrancy Ordinance 1958 already exists.
	<i>[Signature]</i> Asstt. Director (Litigation) Social Welfare. SE and WE Khyber Pakhtunkhwa.	

W.H. Chaudhary

The vagrants create a bad image for our country and our own people especially on foreigners but also create numerous problems for the general public. Beggary being a flourishing profession, the number of beggars is increasing with the passage of time. The children do not like the menace of beggary is not liked the beggar himself but they are being enforced to beg for their families & others.

To tackle this evil stigma within the prevailing local condition the establishment of Welfare Home for Children Beggars at Peshawar is proposed. The handicapped that on account of their physically disability or any other reasons and are being unable to earn livelihoods have to be kept in beggars Welfare Home where such people could be looked after by the government. The scheme would aim at providing vocational skill training and rehabilitation services to approximately 120 child beggars annually.

Peshawar High Court has assigns the task to 1st class Special Magistrate to implement the vagrancy ordinance/law appropriately.

In Welfare Home training in the following disciplines are being given to children beggars:-

- a) Electricity wiring.
- b) Canning
- c) Tailoring

Ulema and the khatibs under the Administrative control of Auqaf Department would be requested through Auqaf Department to deliver Friday sermons on the subject in light of the teaching of the Holy Quran and sunnah.

The local councils, Nazims and

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

		elected community leaders have be involved in the process of identification of beggars their arrest and picking up to Welfare Home .
	Justification of Revision	The PC-1 is being revised in light of the recommendations of Evaluation Committee constituted to decide the future of the scheme whether to convert the scheme to current budget or continue it on developmental side till maturity or terminate the scheme due to non-satisfactory performance. The committee has agreed to continue this scheme on development side for a further period of two years i.e. from 01.07.2006 to 30.06.2008.
	b) Give details of administrative structure for implementing the project	Details are given in part C.
	c) Give population of the area to be served , age groups and income levels	The population of Peshawar District are being served
	d) Relationship with other programmes in the same sector and in other sectors. Indicate whether coordination with other sectors has been ensured:	NA
	e) Give student-teacher ratio for the project and the national average for their proposed level of education give also the extent of library and laboratories facilities per student and how it compares with the national average.	NA
	f) The employment prospects of the persons to be trained in terms of the present and future demand.	NA
	g) Employment to be created by gender	13
	h) Detailed analysis of estimation of the likely employment.	Staff have been employed for operation of Centre
	i) Give details of the type of training or education to be imparted. The syllabus and the subjects in which emphasis will be placed. Indicate availability of teaching staff	NA
12	Give date when capital expenditure estimates were prepared. If prepared more than one year ago, confirm if they are still valid.	July, 2004 July, 2006


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

13	Capital cost: Give breakdown of capital cost year-wise concerning the whole of the investment period.	Approved Total	= Rs. 4.621 M
		Year	Amount
		2004-2005	Rs. 1.433 M
		2005-2006	Rs. 1.930 M
		2006-2007	Rs.2.230 M
		2007-2008	Rs.2.230 M
		Total	Rs. 7.823 M
14	Basis of cost estimates (Give full details)	Market Rates	
	a) Details financial statement both on cumulative and incremental basis for all projects to clearly identify the elements of subsidies / profits on commercial lines should be part of every PC-I. The financial statements should be prepared on standard commercial formats	NA	
	b) Exchange rate should be automatically adjusted on the basis of latest information by Planning and Development Division during project scrutiny.	NA	
	c) A specific set of calculation showing O & M expenditure as a consequent of project and its means of financing	NA	
15	Estimates of annual recurring expenditure after completion of each phase of project, (also indicate source of financing recurring expenditure)	Rs. 2.230 Million Under ADP allocation	

Salaries of the staff Fixed cost variable cost Total cost
0.888 0.888 0.888 million

	a)	Establishment	See Part C
	b)	Ancillary staff	
	c)	Supervisory and administrative staff	
	d)	Consumable store and sups ((please specify)	
	e)	Books and Journals	
	f)	Contingent staff	
	g)	Other contingencies e.g electricity, water, postage etc	
	h)	Rent & service charges	Rs 30,000/pm
	i)	Other expenditure e.g sports and workshops supplied	
	j)	POL charges	
	k)	Repair & maintenance	

16	Unit cost for each category of service or output e.g for educational institutions, the cost per student and how it compares with cost in other institutions	NA
17	In case of the project for production of goods and services e.g production of text books, give	NA



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

	expected income statement (profit and loss accounts) for ten years or until normal capacity is reached .(Rate of depreciation and salvage value of property should be given). Also give amount of subsidy with source, if any.																							
18	Annual phasing of physical work and financial requirements for the projects.(Attached bar diagrams, if prepared) Actual Cost Revise estimated cost	<table border="1"> <thead> <tr> <th>Year</th> <th>Total allocation</th> </tr> </thead> <tbody> <tr> <td>2004-2005</td> <td>Rs. 2.396 million</td> </tr> <tr> <td>2005-2006</td> <td>Rs. 2.225 million</td> </tr> <tr> <td>Total</td> <td>Rs. 4.621 million</td> </tr> <tr> <th colspan="2">Revised cost</th> </tr> <tr> <th>Year</th> <th>Amount</th> </tr> <tr> <td>2004-2005</td> <td>Rs. 1.433 M</td> </tr> <tr> <td>2005-2006</td> <td>Rs. 1.930 M</td> </tr> <tr> <td>2006-2007</td> <td>Rs.2.230 M</td> </tr> <tr> <td>2007-2008</td> <td>Rs.2.230 M</td> </tr> <tr> <td>Total</td> <td>Rs. 7.823 M</td> </tr> </tbody> </table>	Year	Total allocation	2004-2005	Rs. 2.396 million	2005-2006	Rs. 2.225 million	Total	Rs. 4.621 million	Revised cost		Year	Amount	2004-2005	Rs. 1.433 M	2005-2006	Rs. 1.930 M	2006-2007	Rs.2.230 M	2007-2008	Rs.2.230 M	Total	Rs. 7.823 M
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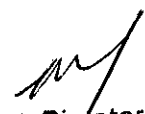
19	I	Foreign Exchange	Expenditure
		NA	NA

20	a).Likely sources and amount of foreign exchange cost of the project	NA
	b)Present position regarding availability, commitment or negotiations.	NA
21	Indicate source and amount of rupee component of project	Government of NWFP

	a) Government sources (please specify federal and provincial)	
	i) Grant	Provincial Government
	ii) Loan	NA
	iii) Investment	NA
	iv) Direct Govt Exp	As per cost estimate
	b) Sponsoring Agency's own fund	NA
	c) Private Investment	NA
	d) Local body resources , if any	NA
	e) Non-Government borrowing	NA
	f) Community contribution	NA
	g) Other sources (e.g recoveries	NA
22	Results of the project	
	a) Direct benefits number of persons served.	<p>1. Approximately 120 children heggars will be rehabilitated in the centre per year, a total of 480 in the whole period:</p> <p>2. 13 employees of the project will be benefited</p>
	b) Indirect and other benefits contribution toward specific targets/social objectives	Improvement of Social Services and the families of these people will be benefited in the sense that their economic problem would be


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

		decreased as the vagrant would become a profitable one instead of a burden for the family after learning the necessary skills.
	c) Efforts being made in the project for skills development.	Skill training is being provided in three areas to the vagrant.
	d) Specific facilities (such as schools, health center, hospital etc) which will become available to the people in the project localities.	NA
	e) Other socio-economic benefits/disadvantages which are likely to accrue as a result of the project.	NA
23	a) Approximate number and categories of job opportunities likely to be created indirectly as a result of i) Implementation ii) Operation of project	Those get trainings in skills will supposed to get jobs in other organizations or established their own centers. NA NA
	b) Economic life of project components i) Building ii) Equipment	Rented building at the rate of Rs.30,000/MP. 6 Years


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

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PART 'C'
PROJECT REQUIREMENTS

24	Detailed list of technicians and professionals required for implementation of the project	
----	---	--

Staffing.

Name of Post	BPS	No. of post	Salary per month	Salary per year
Superintendent	17	01	12654	151,848
Religious Teacher	16	01	8240	98880
KPO	12	01	6153	73836
Instructor	11	02	5873	140952
Driver	04	01	4668	56016
Cook	01	01	4365	52380
Naib Qasid	01	01	4365	52380
Chowkidar	01	04	4365	209520
Sweeper	01	01	4365	52380
Total		13		888,192

The fixed salary of staff has been calculated on the basis of initial pay of scale plus all admissible allowance w.e.f 1.7.2006

Comparative Statement of Approved Salary and Proposed Salary Per Month

Name of Post	BPS	Salary paid PM (Fixed)	Salary proposed per month (fixed)	Increase in salary
Superintendent	17	9,549	12654	3105
Religious Teacher	16	6,193	8240	2047
KPO	12	4,604	6153	1549
Instructor	11	4,363	5873	1510
Driver	04	3,588	4668	1080
Cook	01	3,325	4365	1040
Naib Qasid	01	3,325	4365	1040
Chowkidar	01	3,325	4365	1040
Sweeper	01	3,325	4365	1040
Total		41,597	55048	13451

YEARLY INCREASE IN SALARY

Approved salary per Annum	=	Rs. 499,164/-
Proposed salary per Annum	=	Rs. 660,576/-
Total increase per Annum	=	Rs. 161,412/-

Justification for proposed increase in the salary

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

REVISED BUDGET ESTIMATES OF THE PROJECT

ANNEX-1

(Rs. In Million)

Sr.#	ITEM	Actual Budget	Actual Budget	Proposed Budget	Proposed Budget	TOTAL
		2004-05	2005-06	2006-07	2007-08	
1.	Salary of the Staff	0.100	0.656	0.888	0.888	2.532
2.	Purchase of Vehicle (Suzuki Van-CNG fitted)	0.500	0	0	0	0.500
3.	Purchase of Machinery & Equipment.	0.300	0	0	0	0.300
4.	Purchase of Furniture & fixture	0.200	0	0	0	0.200
5.	Repair of Vehicle	0	0.015	0.015	0.015	0.045
6.	Repair of Machinery & Equipment	0	0.002	0.003	0.003	0.005
7.	T.A.	0	0.001	0	0	0.001
8.	POL/CNG Gas	0	0.010	0.020	0.020	0.050
9.	Postage Charges	0	0.001	0.001	0.001	0.003
10.	Telephone Charges	0	0.004	0.005	0.005	0.014
11.	Gas Charges	0	0	0.020	0.020	0.040
12.	Water Charges	0.002	0	0.002	0.002	0.006
13.	Electricity Charges	0.008	0.018	0.030	0.030	0.086
14.	Stationary	0.003	0.002	0.010	0.010	0.025
15.	Rent of the building	0.100	0.360	0.360	0.360	1.180
16.	Other Stores	0.180	0	0.005	0.005	0.190
17.	Others (Skills Training Tools & Materials)	0.020	0.010	0.010	0.010	0.050
18.	Food Charges	0	0.850	0.850	0.850	2.550
19.	Other Medicines	0.020	0	0.010	0.010	0.040
20.	Contingencies	0	0.001	0.001	0.001	0.003
	Total cost (Revised)	1.433(Act.)	1.930 (Act.)	2.230	2.230	7.823


(Say = Rs. 7.823 Million)

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



COMPARATIVE STATEMENT OF COAST ESTIMATES OF THE LAST SANCTIONED AND REVISED ESTIMATES

Year	Last sanctioned amount			Revised amount		
	Local	Foreign Exch.	Total	Local	Foreign Exch.	Total
2004-06	1.433	0	1.433	1.433	0	1.433
2005-06	1.600	0	1.600	1.930	0	1.930
2006-07	0	0	0	2.230	0	2.230
2007-08	0	0	0	2.230	0	2.230
Total	3.033	0	3.033	7.823	0	7.823


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

A. MACHINERY AND EQUIPMENT

S.No.	Name of item.	Quantity
1.	Computer Pentium-IV	1
2.	Printer Howlet 1200	1
3.	Deep freezer Full-size (Waves)	1
4.	Washing Machine with Heavy Duty Dryer.	1
5.	Pedestal Fan 56" (Younus)	1
6.	Ceiling Fan 56" (Younus)	10
7.	Iron (Japan)	1
8.	T.V. (Sony 21")	1
9.	Stabilizer (Pak-made) 2000 Voltage.	2
10.	Water Cooler H 49 (Singer)	1
11.	Iron Stand	1

B. SKILLS TRAINING TOOLS & MATERIALS

S.No.	Name of item.	Quantity
1.	Hand operated Sewing Machines	10
2.	Foot operated Sewing Machines	05
3.	Stitching Machine	1
4.	Over lock Machine	1
5.	Training Box for Electronic Instructor consisting minor equipments just for Training purpose.	1
6.	Cloth for training	As per requirements
7.	Sewing thread	-do-
8.	Electric Wires	-do-
9.	Plastic Board (Electric)	-do-
10.	Other Raw Materials for training as per requirements of the training	-do-

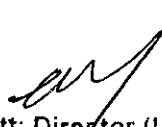
WY
 Asstt. Director (Litigation,
 Social Welfare, SE and WE,
 Khyber Pakhtunkhwa.

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C. FURNITURE & FIXTURE.

For purchase of furniture & fixture, order would be placed with German Wood Works for provision of required item as per Government instructions. Detail of furniture & fixture is given below: -

Sr.#	Items Description	Number
1.	Steel Almirah, 18x3x6	3
2.	Office Table 6x4x2 1/2 (Shesham Wood)	1
3.	Computer Table Normal Size.	1
4.	Office Table 5x3x2 1/2 with 3 drawz	2
5.	Side Rack	3
6.	Office Chairs (steel)	12
7.	Bench Steel Frame Top Shesham Wood.	3
8.	Cutting Table.	1
9.	Revolving Chair.	1
10.	Steel Cabinet.	2
11.	Trunk Full-size 7x4	1
12.	Trunk Small size.	12


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

JOB DESCRIPTIONS

A.) Rehabilitation Officer shall lead the project and be responsible for overall supervision and management of the Centre. He shall keep liaison with other related departments at the district level seek their assisted. Whenever required and collect the drug addicts persons from the public detoxification centre of Health as well as Social Welfare Department. He shall maintain accounts and be responsible for expenditure incurred during the financial year. The Director Social Welfare shall delegate responsible of DDO after appointment or as He/She feel necessary.

He shall comply with the instructions of the Secretary of Social Welfare & Women Development Department. He shall furnish quarterly progress report of financial utilization and excess/surrender statement to Directorate as well as to Administrative Department regularly. Being Secretary to the Monitoring Committee, he shall arrange meeting on quarterly basis and circulate minutes of the meetings to all concerned.

B) Religious teacher shall be responsible to Principal for his/her functions. He shall impart religious teaching to the addicted persons and in light of the Islamic gestures, motivate them towards a new life liked by the God and his Prophet. He shall do the religious therapy of the addicted persons. This will decrease relapsed cases. Besides he will teach them formal education.


C) Instructor shall provide training to the drug addicts in various skills keeping the available facilities. He/She will maintain accounts record of the trainees as well as of the assets etc in the relevant registers. He shall coordinate with other such like centres in the locality and arrange with their assistance, skill training in new fields/ areas.

D) Hostel Warden shall responsible for the administration of the hostel only. He manage all hostel affairs/activities and look after the drug addicts in order to avoid any miss happening. He shall arrange the hostel schedule with the consent of the Rehabilitation Officer.

E) The Junior Clerk shall perform the following duties:-

- i. Receipt & dispatch
- ii. Dairying & maintenance of the record registers
- iii. Record keeping.
- iv. Typing.
- v. Stationery indenting & storing.
- vi. Do such other work as may be entrusted to him by the In charge Officer.

F) Naib Qasid shall be responsible to the Incharge Officer and shall perform such duties e.g serve drinking water, fetch refreshments, etc, as well as facilitate his/her Incharge officer in performance of his/her official duty. He performs such other work as may be entrusted to him by the In charge Officer.


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

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OFFICE OF THE
DISTRICT COORDINATION OFFICER
CITY DISTRICT GOVT. PESHAWAR.

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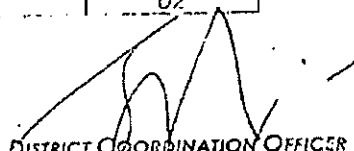
Dated Peshawar the 2/8/2008.

OFFICE ORDER

20/62/09-25. Consequent upon shifting of Welfare Home for Child Beggars Peshawar from ADP Scheme to regular budget and on creation of posts on current budget side w.e.f 01-07-2008 vide Finance Department Notification No. 110VIII/11/1-5/2007-08/SNE, dated 16-4-2008 and Government of NWFP Directorate of Social Welfare and Women Development Department, Peshawar letter No. DSW/PO/Regul/06-07/3205-07 dated 04-07-2008, the services of the following existing staff of the Welfare Home for Child Beggars Peshawar are regularized w.e.f 01-07-2008 and are adjusted against the said post.

They will be civil servants for all other government benefits except pension w.e.f, 01-07-2008. In lieu of Pension they would be entitled to receive contributory fund as per Government Rules.

S.No	Name	Designation	BPS
1.	Juma Khan	K.P.O	12
2.	Imranullah	Instructor Tailoring	11
3.	Asad Ali	Instructor Electrician	11
4.	Musharaf Khan	Religious Teacher	09
5.	Inayatullah	Driver	05
6.	Zahid Khan	Naib Qasid	02
7.	Rafiq Khan	Chowkidar	02
8.	Muhammad Abid	Chowkidar	02
9.	Soldar Khan	Cook	02
10.	Misal Khan	Sweeper	02



DISTRICT COORDINATION OFFICER
CITY DISTRICT GOVERNMENT
PESHAWAR.

Endst: Even No & Date.

Copy to: -

1. The Accountant General, NWFP, Peshawar.
2. The Director, Social Welfare & Women Dev; Deptt: NWFP Pesh.
3. The District Comptroller Officer, Peshawar.
4. The District Officer, Social Welfare Deptt: C.D.G Peshawar.
5. The PS to Minister for Social Welfare & Women Dev: NWFP Pesh.
6. The PS to Secretary, Zakat Ushr, Social Welfare, NWFP Peshawar.
7. The official concerned.

DISTRICT COORDINATION OFFICER
CITY DISTRICT GOVERNMENT
PESHAWAR.


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

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Annexure B

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

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

Dated Peshawar, the 24th July 1986

From

Muhammad Dilshad Khan,
Secretary to
Government of N.W.F.P.,
Finance Department,
Peshawar.

193 (11)

Annex C

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./P.T.C. 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).

ANNEXED

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

(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)

To be
P. Singh
Senior Special
Educator

(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
J. Singh
Junior Special Educator

(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) P.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 blinds. (to be certified by the S.W. Directorate)

To be
Asstt. Spe.
Educator

(d) Un-trained, under Graduate B-11 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.

(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.

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

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

- (c) Trained under-Graduate (B.A./B.Sc. with C.T./P.T.C./N.V.) with adequate knowledge of teaching the mentally retarded & physically disabled (to be certified by the Social Welfare Directorate)
- (d) Untrained under-Graduate Teachers with adequate knowledge of teaching the mentally retarded & physically disabled (to be certified by the Social Welfare Directorate)

B-14

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

These teachers should continue in B-11, till such time they cross 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)
ADL: FINANCE SECRETARY-I
GOVERNMENT OF N.W.F.P.

Encl. No. FD(SR-I)-11-95/84-II. Dated Pesh. the 24th July, 1986.

Copy of the above is forwarded to:-
1) The Accountant General, N.W.F.P., Peshawar.
2) The Director, Social Welfare, N.W.F.P., Peshawar.

(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 Azad Jammu and Kashmir, Finance Department, Muzaffargarh.

(PAKIS ZAMAN)
SECTION OFFICER (SR-I)

ATTESTED

Attested by

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

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**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

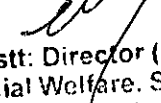
Secretary to
Government of N.W.F.P
Health And Social Welfare Deptt:
Peshawar.

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

(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.

[Signature]
 Asstt. Director (Litigation)
 Social Welfare, SE and WE,
 Knybel 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.

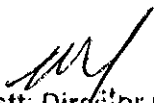
(SAEED AHMED ALVI)
DEPUTY SECRETARY
(REGULATION)
FINANCE DEPARTMENT

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)


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

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Annex D

1-212



GOVERNMENT OF KHYBER PAKHTUNKHWA
SOCIAL WELFARE & WOMEN
DEV: DEPARTMENT

Dated Peshawar the June 27, 2011

NOTIFICATION.

NO. SOII(SWD) IV-59/3895-3902 In Compliance with order of Service Tribunal, Khyber Pakhtunkhwa dated 11-11-2010 passed in Appeal No. 1396/2010, titled "Mrs. Javeria Zaman, (Religious Teacher)-vs-Secretary to Govt of Khyber Pakhtunkhwa, Zakat, Ushr, Social Welfare and Women Development Department & Others", BPS17 is hereby awarded to Mrs. Javeria Zaman, Religious Teacher (BPS-09), Center for Mentally Retarded and Physically Handicapped, Children District Mansehra (Presently Working in Haripur District) as admissible under the Finance Department circular letter No. FD (SR-I)/1-95/84-III, dated 24-07-1986 w.e.f. 11-11-2010.

The grant of BPS-17 shall be treated personal to her & shall not confer any right on her to claim seniority over her elsewhere seniors in the normal course of promotion.

Secretary to Govt. of Khyber Pakhtunkhwa
Zakat, Ushr, Social, Welfare & Women
Dev: Department

ENDST: EVEN NO & DATE:

Copy is forwarded for information and necessary action to: -

1. ✓ The Director Social Welfare and Women Dev: Khyber Pakhtunkhwa Peshawar.
2. The Distt: Coordination Officer, Haripur.
3. The Section Officer (SR-I), Finance Department Khyber Pakhtunkhwa.
4. The District Officer Social Welfare, Haripur.
5. The District Account Officer, Haripur.
6. The Manager, Center for Mentally Retarded and Physically Handicapped, Children, District Haripur.
7. The Officer concerned.
8. The Personal file of the officer concerned.

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

24/298

A-D (admn)

3-
29/6

(Muhammad Shahid)
Section Officer -II



Government of Khyber Pakhtunkhwa
Social Welfare, Special Education & Women
Empowerment Department
Dated Peshawar the, 10-09-2023

AUTHORITY LETTER

Mr. Syed Nabi Gul Superintendent, of Litigation Section Directorate of Social Welfare, Special Education & Women Empowerment Peshawar, is hereby authorized to submit para-wise reply /comments in S.A No.1411/2022 titled Ali Subhan Vs Govt of Khyber Pakhtunkhwa on behalf of Secretary, Social Welfare, Special Education & Women Empowerment Department. It is further stated on oath that the answering respondents in this appeal have neither been placed ex-parte nor their defense struck off.

-Sd-
Secretary,
Social Welfare, Special Education and
Women Empowerment Department

Endst: of Even No. & Date:-

Copy forwarded to:-

1. Syed Nabi Gul Superintendent, Directorate of Social Welfare Khyber Pakhtunkhwa
2. PS to Secretary Social Welfare Khyber Pakhtunkhwa Peshawar.

Section Officer-(Lit)
Social Welfare Department