

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 1562/2022

Munib-Ur-Rehman Ex-AD BS-17, DCTE Abbottabad.....Appellant

VERSUS

**Government of, Khyber Pakhtunkhwa through the Secretary E&SE
Department & others..... Respondents**

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Assistant Director (Lit: II)
E&SE Khyber Pakhtunkhwa,
Peshawar

25-10-23
A. Ahsan

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

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VERSUS

Government of, Khyber Pakhtunkhwa through the Secretary E&SE Department & others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 3-5.

Respectfully Sheweth,

The Respondents submit as under:-

Copy of the appeal
No. 8254
Date 12-10-23

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi to file the instant appeal against the Respondent Department.
- 2 That the appellant is not an aggrieved person within the meaning of section-04 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of 1973 Islamic Republic of Pakistan.
- 3 That the appellant has concealed material facts from the ambit of this Honorable Tribunal in the titled appeal.
- 4 That the Appellant has not come to this Honorable Court with clean hands.
- 5 That the appeal in hand is based on mala fide intentions for illegal service benefits against the ASDEO (M) MC (BS-16) from the Respondent Department in violation of the Rules & Policy in vogue.
- 6 That the appeal in hand is barred by law in view of the law of limitation Act-1908.
- 7 That the appellant is not entitled for the grant of pay protection under the mandatory provision of FR-23 read with the Notification dated 08-06-2010 of the Finance division regulation wing Govt; of Pakistan.
- 8 That vide order/Notification dated 24-02-2020 the lien of the appellant has been terminated by the competent authority in response to the application dated 08-02-2022 for his adjustment against the ASDEO in BS-16 post in District Abbottabad.
- 9 That as per Notification dated 10-09-2020 of the E&AD Khyber Pakhtunkhwa the appellant is also not entitled for the grant of pay protection under section-2(1)(b) of Khyber Pakhtunkhwa civil servant Act-1973.
- 10 That the appeal in hand is bad for mis-joinder & non-joinder of the necessary parties.

ON FACTS.


- 1 That Para-1 pertains to the service record of the appellant against the ASDEO Male post & his subsequent recommendation by the KPPSC against the HM in BS-17 TC post as evident from the Notification dated 12-04-2019 with reference to S.No. 60 of the said Notification *attached as Annex-A*.
- 2 That Para-2 is incorrect & mis-leading on the grounds that the appellant has been adjusted against the HM in BS-17 TC post on the basis of his recommendation by the KPPSC, whereas, the lien against the ASDEO (M) TC in BS-16 was applied & allowed on dated 25-04-2019 as vide order/Notification dated 24-02-2020 the lien of the appellant has been terminated by the competent authority in response to the application dated 08-02-2022 for his adjustment against the ASDEO in BS-16 post in District Abbottabad. *attached as Annex-B*.
- 3 That Para-3 is also incorrect in view of the reply submitted to para-2 Annex-B by the Department, hence, the plea of the appellant is liable to be rejected.
- 4 That Para-4 is correct that the appellant has been adjusted against the HM in BS-17 TC post on the basis of his recommendation by the KPPSC, whereas, the lien against the ASDEO (M) TC in BS-16 was applied & allowed on dated 25-04-2019 as vide order/Notification dated 24-02-2020 the lien of the appellant has been terminated by the competent authority in response to the application dated 08-02-2022 for his adjustment against the ASDEO in BS-16 post in District Abbottabad. Already attached as Annex-B.
- 5 That Para-5 is also incorrect as the act of the Respondent Department with regard to the non-processing the case of the appellant for the grant of pay protection against the ASDEO (BS-16) MC post through the District Accounts Officer Abbottabad, as the fixation of pay protection is the exclusive jurisdiction & competency of the Accountant General Office Khyber Pakhtunkhwa/ DAO Abbottabad, which is legal on the grounds that the appellant has changed his cadre from MC to TC in the Department, hence, the Rules of pay protection do not apply upon the case of the appellant. (copies of the appellant in terms of the Notification dated 08-06-2010 & FR-23 *attached as Annex-C*).
- 6 That Para-6 regarding submission of Departmental appeal dated 06-07-2022 for his fixation of his pay protection against the ASDEO (M) in BS-17 has been addressed to the Respondent No. 1 & he would be in a better position to reply to this para being the relevant authority *attached as Annex-D*. with the submission that the appellant is not an aggrieved person within the meaning of Article 212 of the constitution of 1973, therefore, the case in hand is liable to be dismissed on the following grounds inter alia:-


GROUND.

- a) Incorrect & not admitted, the appellant has been treated as per law & rules by the Respondents No. 1 & 2 in the titled appeal, hence, the claim of the appellant for his pay protection in BS-17 MC as ASDEO is illegal.
- b) Incorrect & not admitted. As reply to this ground has been given in the foregoing paras by the Respondents No. 3-5 in the instant reply.
- c) Incorrect & not admitted. The act of the Respondents No. 1-2 is within legal parameter as well as in accordance with the relevant financial Rules in vogue.

- d) Incorrect & not admitted. The act of the Department is legal with regard to the non-grant of pay protection in BS-17 against the ASDEO post as he has changed his cadre from MC to TC, whereas, his lien has also been terminated vide the above-mentioned Notification under the Rules.
- e) Incorrect & not admitted. the appellant has been treated as per law & rules by the Respondents No. 1 & 2 in the titled appeal, hence, the claim of the appellant for his pay protection in BS-17 MC as ASDEO is illegal as the appellant has not been discriminated rather the Department has acted in accordance with the provision of Articles-4 & 25 of the constitution of the 1973.

Therefore, in view of the above made submissions, the appeal in hand may kindly be dismissed in favor of the Department in the interest of justice.


SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 3)


DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 4 & 5)

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA
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Service Appeal No: 1562/2022

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VERSUS

**Government of, Khyber Pakhtunkhwa through the Secretary E&SE
Department & others.....Respondents**

AFFIDAVIT

**I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department
Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the
contents of the instant para wise Comments are true & correct to the best of my
knowledge & belief. It is further stated on oath that in this appeal the
answering Respondents have neither been placed Ex-Parte nor their defense
has been struck off/cost.**


Deponent

ATTESTED



12-10-2023



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

Annexure (A)

Dated Peshawar the April 12, 2019

NOTIFICATION

NO.SO(SM)E&SED/3-2/2016/Recruitment of Male 191 HM (BS-17): Consequent upon the recommendation of Khyber Pakhtunkhwa Public Service Commission vide letter No.001638 dated 23.01.2019 & No.005640 dated 18.03.2019 the Competent Authority/Chief Secretary Khyber Pakhtunkhwa is pleased to appoint the following one hundred and thirty three (133) candidates as Headmaster (BS-17) (@Rs.30370-2300-76370) plus usual allowances as admissible under the rules, on regular basis under the existing policy of the Provincial Government.

2. Consequent upon their appointment as Headmaster (BS-17), they are posted on positions and stations as noted against each:

Sr#	Name with Father's Name	Domicile/Zone	Posted as	Remarks
1.	Ayaz Ahmad S/O Fida Muhammad Khan	Swabi/2	Headmaster (BS-17) GHS Jalbai Lahor Swabi	Against vacant post
2.	Muhammad Ramzan S/O Allah Nawaz	D.I. Khan/4	Headmaster (BS-17) GHS Bagh Pur Dheri Haripur	-do-
3.	Mushtaq Ahmad S/O Zubair Khan	Matakand/3	Headmaster (BS-17) GHS Kamala Dir Lower	-do-
4.	Muhammad Younas S/O Abdul Jalil	Karak/4	Headmaster (BS-17) GHS Town Committee Karak	-do-
5.	Zahid Ali S/O Moosa Khan	Abbottabad/5	Headmaster (BS-17) GHS Kukmong Abbottabad	-do-
6.	Sahib Zada S/O Badshah Zada	Bajaur/1	Headmaster (BS-17) GHS Toor Qila Dir Lower	-do-
7.	Sard Jamal S/O Hazrat Usman	Swat/3	Headmaster (BS-17) GHS Jano Swat	-do-
8.	Niaz Ali S/O Sardar ali	Tank/4	Headmaster (BS-17) GHS Toran Tank	-do-
9.	Haji Malang S/O Hazrat Mir	Mohmand/1	Headmaster (BS-17) GHS Sagi Bala Mohmand	-do-
10.	Mushtaq Ahmed S/O Muhammad Ismaeel	Manshra/5	Headmaster (BS-17) GHS Hangra Balakot Manshra	-do-

Attested
P



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45.	Rohul Amin S/O Jamroz Khan	Malakand/3	Headmaster (BS-17) GHS Habigram Malakand	-do-
46.	Shoukat Ali Khan S/O Muhammad Ali Khans	Lakki Marwat/4	Headmaster (BS-17) GHS Wanda Baroo Lakki Marwat	-do-
47.	Muhammad Aantir Ali S/O Qazi Muhammad Tahir Ali	Abbottabad/5	Headmaster (BS-17) GHS Satora Abbottabad	-do-
48.	Muhammad Shahid Khan S/O Aslam Khan	South Waziristan/1	Headmaster (BS-17) GHS Wanda Jamal D.I. Khan	-do-
49.	Rehmat Ullah S/O Raqim Khan	Tank/4	Headmaster (BS-17) GHS Kaka Khel Tank	-do-
50.	Afzal Khan S/O Shadi Khan	Kohat/4	Headmaster (BS-17) GHS Kandar Kohat	-do-
51.	Tariq Mehmood S/O Muhammad Afzal	Abbottabad/5	Headmaster (BS-17) GHS Badhora Abbottabad	-do-
52.	Arif Hussain S/O Ali Janan	Kurram/1	Headmaster (BS-17) GHS Amal Kot Kurram	-do-
53.	Saif Ur Rehman S/O Abdur Rehman	Lakki Marwat/4	Headmaster (BS-17) GHS Matora Lakki Marwat	-do-
54.	Asmat Ullah Khan S/O Naimat Ullah Khan	Bannu/4	Headmaster (BS-17) GHS Ismaili Mama Khel Bannu	-do-
55.	Riaz Hussain S/O Bakht Ahmad	Bajaur/1	Headmaster (BS-17) GHS Gujrat Mardan	-do-
56.	Ihsan Ullah S/O Sabz Ali	Peshawar/2	Headmaster (BS-17) GHS Kurri Nowshera	-do-
57.	Sartaj Khan S/O Shir Dal Khan	Buner/3	Headmaster (BS-17) GHS Matwani Buner	-do-
58.	Inyat ullah S/O Taj Muhammad	Malakand/3	Headmaster (BS-17) GHS Shah Noor Pul Takht Bai Mardan	-do-
59.	Zia Ullah Khan S/O Ghulam Subhani	Swat/3	Headmaster (BS-17) GHS Pishmal Swat	-do-
60.	Munibur Rehman S/O Abdul Ghafoor	Abbottabad/5	Headmaster (BS-17) GHS Garhi Nurpor, Abbottabad	-do-
61.	Shad Ali S/O Meer Dad Khan	Swabi/2	Headmaster (BS-17) GHS Yaquobi Swabi	-do-
62.	Muhammad Shahzad Khan S/O Bahadar Khan	Mardan/2	Headmaster (BS-17) GHS Babain Mardan	-do-

Attested
P



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Phone: 091-9210480, Fax # 091-9211419

131	Said Qamar S/O Shah Nazar	Shangla/3	Headmaster (BS-17) GHS Basi Alpuri Shangla	-do-
132	Mr. Muhammad Javed S/O Alam Sher	D.I. Khan/4	Headmaster (BS-17) GHS Mitha Pur D.I. Khan	-do-
133	Mr. Muhammad Shoaib Afzal S/O Muhammad Afzal	Abbottabad/5	Headmaster (BS-17) GHS Kanthiali Abbottabad	-do-
ADJUSTMENT				
134	Muhammad Naqib Ullah, SS H/Civics (BS-17) working against HM (BS-17) GHS Khutti D.I. Khan	SS II/Civics (BS-17) GHS D.I. Khan	GHS Shore Kot	-do-

Terms and Conditions:

1. They shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the rules made thereunder.
2. Their pay shall be released subject to verification of their academic documents/testimonials from the concerned Board/University by the District Education Officer (Male) concerned.
3. Their services shall be considered regular and they shall be eligible for pension/deduction of GP Fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
4. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Government.
5. They shall be on probation for initial period of one year extendable for further one year as per rules.
6. They shall be governed by such rules & regulations as may be issued from time to time by the Government.
7. Their services can be terminated at any time, in case their performance was found unsatisfactory during probationary period.
8. The appointees shall join their posts within 30 days of the issuance of this notification and the Director E&SE Khyber Pakhtunkhwa Peshawar shall furnish a certificate to the effect that the candidates have joined their posts.

Attested
R



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
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Phone: 091-9210480, Fax # 091-9211419

failing which their candidature shall expire automatically and no subsequent appeal etc shall be entertained.

9. Charge assumption report should be submitted to all concerned.
10. No TADA shall be allowed to the appointees for joining their duties

SECRETARY
E&SE Department
Khyber Pakhtunkhwa

Endst: of even No. & Date :-

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar, along-with application forms of the above Headmasters.
3. Director (Recruitment) Khyber Pakhtunkhwa Public Service Commission Peshawar.
4. District Education Officers (Male) Concerned.
5. District Accounts Officers Concerned.
6. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
7. PS to Advisor to CM for E&SE Department. Khyber Pakhtunkhwa.
8. Director EMIS. E&SE Department for uploading at the official website.
9. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
10. Headmasters concerned
11. Master file.

Attested
(P=)

(MOHAMMAD SHOAB)
SECTION OFFICER (SCHOOLS MALE)



Register
**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

9

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Annexure (D)

NOTIFICATION

The Competent Authority is pleased to terminate the Lien Retention order in respect of Mr. Munib Ur Rehman presently serving as Assistant Director (BPS-17) at Directorate of Curriculum and Teacher Education (DCTE) Abbottabad against the post of ASDEO (M) granted by this office vide No.776-35 dated 26-05-2019, in the light of DCTE Abbottabad letter No.648 dated 08-02-2022 with immediate effect in the best interest of public service.

Furthermore he is adjusted as ASDEO (M) circle Birote District Abbottabad with immediate effect.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No. 4949-50 F.NO.112/SST (M)/Lien Cases Dated the Peshawar 24-02-2022

Copy forwarded to the:

1. District Education Officer (Male) Abbottabad.
2. Directorate of Curriculum and Teacher Education (DCTE) Abbottabad.
3. District Accounts Officer Abbottabad
4. Officer Concerned.
5. Master Copy

Attested

24/2/22
Deputy Director (Estab-M1)
Elementary & Secondary Education
Khyber Pakhtunkhwa

F. No. 4 (2) R-2/1996-r.235/2010

Islamabad, the 08th June, 2010.

OFFICE MEMORANDUM

Subject:- **Fixation/Protection of Pay on Appointment from One Post to Another.**

The undersigned is directed to refer to Finance Division's O.M. No. 4 (2) R-2/96 dated 12th August, 2002 on the subject noted above and to say that in terms of the provisions in para-2 of aforesaid O.M, the benefit of pay protection on their subsequent appointment in Government service is not admissible to the employees of autonomous organizations which are established under the Act/Ordinance or an Executive Order under the authority delegated by the Act/Ordinance.

2. The matter has now been re-considered in light of judgment dated 01-08-2009 of Federal Service Tribunal, Islamabad. in Appeal No. 1921(R)CS/2005 in respect of Mr. Sajjad Rashid and others. It has been decided that henceforth the benefit of pay protection will be extended to the employees of such Autonomous Organizations who have adopted Basic Pay Scales Scheme in toto and who are appointed in Government Departments through proper channel. In view of the aforesaid position, para-2 of the Finance Division's O.M. No. F. 4(2)R-2/96 dated 12th August, 2002 may be substituted as under:-

"2. The benefit of protection of pay to the employees of autonomous bodies on their subsequent appointment in government service is not admissible as the employees of autonomous bodies are not civil servant within the meaning of Civil Servant Act, 1973. However, the benefit of pay protection will be admissible to employees of such autonomous organizations who have adopted Scheme of Basic Pay Scales in toto on their appointment in Government offices provided they have applied for the post through proper channel."

Attested
P

Uzair Soomro
(M. UZAIR SOOMRO)
SECTION OFFICER (R-2)
Ph. 9263179

All Ministries/Divisions/Department

a). If he is honorably acquitted, the full pay to which he would have been entitled if he had not be dismissed or removed and by an order to be separately recorded any allowances of which he was in receipt prior to his dismissal or removal; or

b). If otherwise, such proportion of such pay and allowances as the revising or appellate authority may prescribed"

In a case falling under clause (a) the period of absence from duty will be treated as a period spent on duty. In a case falling under clause (b) it will not be treated as period spent on duty unless the revising or appellate authority so directs.

86.

Although the afore-quoted/existing rules cover the case of appellant to be reinstated in service against the noted post in pursuance to the order dated 17-06-2023 of the Learned Additional Session Judge-II Kohat, however, the available record does not transpire that whether the order ibid has been impugned before the Honorable Peshawar High Court, Peshawar or otherwise, hence, it is would be in the interest of justice, if a self-contained report in this regard be asked from DEO (M) Kohat, being custodian of the record of the appellant so as to conclude the appeal of the appellant as per Law/Rules in vogue if agreed Sir.

AD (Lit-II)

10.

DEPUTY DIRECTOR (LEGAL):

Annexure F,

(16)

(11)

To

The Accountant General
Khyber Pukhtunkhwa,
Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ACT OF NON GRANTING OF PAY PROTECTION ON THE JOINING OF ASDEO (M) CIRCLE BIROTE ABBOTTABAD BPS 16 FROM ASSISTANT DIRECTOR (BPS 17) DCTE ABBOTTABAD IN PURSUANCE OF TERMINATION OF LIEN RETENTION ORDER DATED 24/02/2022, PASSED BY COMPETENT AUTHORITY (DIRECTOR E/SE KP PEHAWAR).

Memo:

With due respect it is stated that appellant was performing his duties as ASDEO (Management Cadre) BPS 16 and got successful in Competition/promotion of Head Master BPS 17 conducted by PSC KP Peshawar, his promotion order was issued on 12/04/2019. (Relevant pages of order is attached)

- 2) That appellant applied for right of his lien on his post, ASDEO (Management Cadre) BPS 16, which was not only approved, but relevant order was issued by the competent authority and retained him for two years in order dated 25/04/2019. (Copy of order is attached)
- 3) That before the completion of two years period of lien, competent authority was extended the period for one more year on my request through order 26/05/2021 (Copy attached)
- 4) That on the termination of lien retention order of appellant, by competent authority on 24/02/2022, appellant relieved from the services of Assistant Director (P&D) DCTE KP Abbottabad on 28/02/2022 and rejoined his previous post on very next day on 01/03/2022.
- 5) That appellant fulfilled all coddle formalities, but it came in to the knowledge of appellant that his salary has been reduced and in this regard, for further clarification, he got salary slip for the month of April on 26/06/2022.
- 6) That from salary slip, it revealed that DAO Abbottabad did not fix appellant pay by giving him legal pay protection and Basic Pay Rs 64870 PM BPS 17, reduced to Rs 58430 PM PBS 16.

Attested
(R)

17

12

- 7) That the act of DAO Abbottabad is not only illegal but without jurisdiction, appellant was entitled for pay protection on the basis of relevant law, as he worked in BPS 17 on the pleasure and approval of competent authority and rejoined his previous post on the settled and legal way.
- 8) That the act of illegal reduction of pay made by District Accounts Officer Abbottabad on rejoining previous post ASDEO (Management Cadre) BPS 16 by appellant, which is completely adopted by concerned Department and also appellant under the legal procedure, the whole process of deduction of pay is beyond of DAO's powers jurisdiction and a result of misreading and non reading of relevant rules and it seems the ignorance of office of the District Accounts Officer.
- 9) That in the said matter, value able rights of appellant is involved and DAO did not have any knowledge, that the reduction of pay would be seen as punishment.

In the light of above circumstances it is requested that on acceptance of instant appeal, basic pay of appellant may please be fixed in BPS 16 on the equal stage of Rs 64870, if available in BPS 16 or be fixed in above stage in the interest of justice.

Munibur Rehman 6/07/2022
 Munibur Rehman S/O Abdul Ghafoor (Ex Assistant Director (P&D) Directorate of Curriculum and Teacher Education (DCTE) Khyber Pakhtunkhwa Abbottabad) Now ASDEO Abbottabad R/o Mahallah Kohas, village & P.O Roper, via Lora Tehsil & District Abbottabad.
 03144473888

Attested
R

No. 1421 For Insurance Notices see reverse. Rs. Ps.
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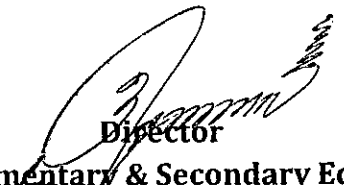
(14)

**DIRECTORATE ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammad Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 1562/2022 Titled Munib UY Rehman VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 12/10/2023


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.