

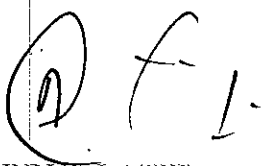
S.No	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	12.08.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">APPEAL NO. 218/2015</p> <p style="text-align: center;">(Mohammad Naveed vs- The Secretary Education (E&amp;SE) Peshawar and three others).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER:-</u> Appellant with counsel (Mr. Asif Yousafzai) and Mr. Raham Taj, ADO alongwith Mr. Ziaullah, Government Pleader for respondents present.</p> <p>2. The present appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 is for directing the respondents to grant monthly salaries to the appellant with effect from 30.11.2013 and onwards and for proper adjustment against his original cadre post of Lab Attendant.</p> <p>3. Arguments heard. Record perused.</p> <p>4. Briefly stating relevant facts as transpired are that the appellant was appointed as Lab Attendant in GGHSS Lady Griffith Peshawar vide order dated 01.10.1996. Undisputedly he was also granted leave without pay with effect from 24.05.2002 to 25.05.2004. According to record, he submitted an application dated 06.05.2013 for resuming his duty on which Director Elementary and Secondary Education Peshawar vide his order dated 22.10.2013 directed for inquiry through Mr. Ali Badshah, Principal GHS Shaheen Camp, to inquire into matter pertaining to leave grant/adjustment of the appellant. The inquiry officer recommended that absence period of the appellant may be converted into his leave without pay and that he may be adjusted against his post without any back benefits. Resultantly, the Director Education Female vide her order dated 29.11.2013 adjusted the appellant against a vacant post of Mali at GHSS Lady Griffith Peshawar and his absence</p>

period with effect from 26.05.2010 to 05.05.2013 was treated as his leave without pay. In the stated situation, it was argued by the learned counsel for the appellant that though the appellant has assumed charge and is performing his duty but so far no salary has been paid to him so far. He next submitted that the appellant was originally appointed as a Lab Attendant which post has now become vacant, therefore the appellant may be adjusted on his original post of Lab Attendant.

5. Contrarily it was submitted by learned Government Pleader that salary matter of the appellant is in the process which may be soon finalized and the appeal may be dismissed.

6. In view of the afore-stated facts, as salary matter of the appellant is in the pipeline and as the real position of availability of post of the Lab Attendant is known only to the respondents, therefore, we would like to remit the case to the respondents with the directions to decide departmental appeal of the appellant in accordance with rules within a period of two months after receipt of this judgment. Full opportunity of hearing be also provided to the appellant. Appeal is disposed of in the above terms. Parties are, however, left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
12.08.2016

  
(ABDUL LATIF)  
MEMBER

  
(PIR BAKHSH SHAH)  
MEMBER

5

27.08.2015

Counsel for the appellant, M/S Khurshid Khan, SO, Javed Ahmed, Supdt. and Rahm Taj, ADO (lit.) alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 23.11.2015 before S.B.

  
Chairman

23.11.2015

Agent of counsel for the appellant and Mr. Raham Taj, ADO alongwith Addl: A.G for respondents present. Para-wise comments on behalf of respondents No. 1 to 3 submitted while learned Addl: AG relies on the same on behalf of respondent No. 4. The appeal is assigned to D.B for rejoinder and final hearing for 11.4.2016.

  
Chairman

11.04.2016

Clerk to counsel for the appellant and Mr. Ziaullah for respondents present. Rejoinder on behalf of the appellant submitted copy of which is placed on file. To come up for arguments on 12.08.2016.

  
Member

  
Member

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as Lab Attendant in the year 1996. That the appellant while serving as such applied for ex-Pakistan leave which was sanctioned for two years with effect from 2002 to 2004 but the appellant ~~was~~ returned from abroad and, thereafter, applied for adjustment and vide impugned order dated 29.11.2013 the absence period of the appellant, with effect from 26.5.2004 to 5.5.2013, was treated as leave without pay and adjusted as Mali with immediate effect. That till date the appellant has not been paid any salary though he has joined ~~leave~~ assignment with effect from 30.11.2013. That the appellant preferred departmental appeal on 24.10.2014 and after lapse of statutory period of 90 days preferred the instant service appeal on 23.2.2015.

Appellant Deposited  
Security & Process Fee →



That the appellant is entitled to the salary and ancillary benefits against the post of Mali with effect from 30.11.2013.

Points urged need consideration. Admit subject to limitation. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.6.2015 before S.B.



Chairman

Appellant with counsel, M/S Khurshid Khan, SO for respondent No. 1 and Javed Ahmed, Supdt. for respondent No. 2 alongwith Addl: A.G for all respondents present. Requested for adjournment. To come up for written reply/comments on 27.8.2015 before S.B.


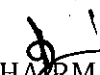


Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 218/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.03.2015	<p>The appeal of Mr. Muhammad Naveed resubmitted today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	26-3-15	<p>This case is entrusted to Bench <u>I</u> for preliminary hearing to be put up thereon <u>01-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>



*fees available*

GOVT: OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

NO:BOX/FD/2-4/2014-15/Peshawar  
Dated Peshawar: the 23/10 2014.

To

The Accountant General,  
Khyber Pakhtunkhwa, Peshawar..

Subject: - UP-GRADATION OF GOVT: GIRLS MIDDLE SCHOOL QAID ABAD  
KAKSHALTO HIGH STATUS IN DISTRICT PESHAWAR.

Audit copy duly authenticated in respect of above subject scheme is sent  
herewith for further necessary action.

Encl: As Above.

*[Signature]*  
BUDGET OFFICER-X.

Endst: No. & date as above.

Office copy of the Audit copy authenticated by this department in respect of  
the above mentioned scheme is forwarded to the Section Officer (B&A), Elementary &  
Secondary Education Department with reference to his letter No SO(B&A)4-  
29/09/Peshawar, dated 20-10-2014 for further necessary action.

BUDGET OFFICER-X.

*انٹرنیٹ*

*GGHS Qaid Abad Peshawar*

*PR-7292*



**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

*Dated Peshawar the, 20.10.2014*

**Sanction**

**No. SO (B&A)/4-29/09/Peshawar-** Sanction of the Government of Khyber Pakhtunkhwa, is hereby accorded to the creation of the following posts and incurrence of the expenditure to the extent in connection with the scheme Up-gradation of GGMS Quaid Abad Kakshal to High level in District Peshawar as developmental scheme on temporary basis w.e.f, 01.10.2014 at a total cost of Rs. 1,582,600/- as per details given below, subject to observance of all codal formalities.

Details of Posts	No. of Posts
Head Mistrees BPS-17	01
SET (BPS-16) (02 Science & 01 Arts)	03
Qaria (B-12)	01
Junior Clerk (B-11)	01
Chowkidar (B-1)	01
Lab: Attendant. (B-1)	01
<b>Total Posts</b>	<b>08</b>
A011-1 Pay of Officers	414,000
A011-2 Pay of other staff	201,600
A01202-House Rent allowance	112,500
A01203-Con: Allowance	252,000
A01207-Washing Allowance	1800
A01208-Dress Allowance	1800
A01217-Medical Allowance	76,500
A0120X-Adhoc Allowance 2010	188,100
A0121A-Adhoc Allowance 2011	57,600
A0121M-Adhoc Allowance 2012	122,400
A0120T-Adhoc Allowance 2013	92,700
A0120-Adhoc Allowance 2014	61,600
<b>Total:-</b>	<b>1,582,600</b>

2. The expenditure involved is debitale to the Functional-cum-object classification 09-Education Affairs and Services 092-Secondary Education Affairs and Services 0921-Secondary Education Affairs and Services 092101-Secondary Education and shall be met out from within the sanction budget Grant 2014-15, through the following Re-appropriation out of the Lump sum provision made in the Budget Estimates 2014-15.

1	2	3	4	5	6	7	8	9
Sender fund	Function	Sender cost centre	Object Head	Function	Receiver Fund	Receiver Cost Centre	Object Head	Amount
NC21073	092101 Secondary Education	PR-7234 Provincial Program (Secondary)	A03970-37 Others, L.S Provision at the disposal of FD	092101 Secondary Education	NC21073	PR-7292 GGHS Quaid Abad Kakshal Peshawar	Details is above	1,582,600

**SECRETARY TO GOVT: OF KHYBER PUKHTUNKHWA  
ELEMENTARY & SECY: EDU: DEPTT:**

Endst. No. BO-X/FD/2-4/2014-15/ Peshawar.

Dated Pesh: the 23/10/2014.

Copy of the above is forwarded to District Accounts Officer Peshawar.

**BUDGET OFFICER-X  
PTO.**



GOVT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

No.BO-X/FD/2-4/2014-15/Peshawar  
Dated Peshawar the 12/12/2014.

To

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

Subject: - UP-GRADATION OF GOVT: GIRLS MIDDLE SCHOOL MOHMAND ABAD  
TO HIGH LEAVEL IN DISTRICT PESHAWAR.

Dear Sir,

I am directed to refer to your Department letter No. SO(B&A)4-29/09/Peshawar, dated 18-11-2014 on the subject noted above and to state that Finance Department agrees to the upgradation of Govt: Girls Middle School Mohmand abad to High status in Disitric Peshawar as developmental scheme, with effect from 01/12/2014 at a Total Cost of Rs. 1,231,300/-. As per details given below, subject to the observance of all codal formalities.

Detail of Posts	No.of Posts
H/M (B-17)	01
SET(B-16)1-Arts,2-Science	03
Qari/Qaria(B-12)	01
Junior Clerk(B-11)	01
Chowkidar(B-01)	01
Lab Attendant(B-01)	01
<b>Total</b>	<b>08</b>
A011-1 Pay of Officers	322,000
A011-2 Pay of other staff	156,800
A01202-House Rent All:	87,500
A01203-Conv: Allowance	196,000
A01207-Washing Allowance	1,575
A01208-Dress Allowance	1,575
A0120X-Adhoc Allw 2010	146,300
A01217-Medical Allowce:	59,500
A0121A-Adhoc Allw:2011	44,800
A0121M-Adhoc Allw: 2012	95,200
A0120T- Adhoc Allw: 2013	72,100
A0120 -Adhoc Allow: 2014	47,950
<b>Total</b>	<b>1,231,300</b>

2. The Expenditure involved is debitable to the Functional-cum-Object classification 09-Education Affairs & Services,092-Secondary Education Affairs & Services,0921-Secondary Education Affairs & Services,092101-Secondary Education and shall be met out from within the sanctioned Budget Grant 2014-15 through the



following re-appropriation out of the lump sum provision made in the Budget Estimates 2014-15.

1	2	3	4	5	6	7	8	9
Sender fund	Function	Sender Cost Centre	Object Head	Function	Receiver Fund	Receiver Cost Centre	Object Head	Amount (Rs)
NC21073	092101 Secondary Education	PR-7234 Provincial Programm (Secondary)	A03970-37 others, L.S provision at the disposal of F D	092101-Secondary Education	NC21073	PR-7294 GGHS Peshawar	Details is above	1,231,000

3. Audit Copy may please be prepared and send to this Department for authentication.

Yours faithfully,

Budget Officer-X.

ENDST; NO. & DATE AS ABOVE.

Copy forwarded to :-

1. The Director, Elementary & Secondary Education, KPK Peshawar.
2. The District Education Officer (Female), Elementary & Secondary Education Peshawar
3. The Deputy Director FMIU, Finance Department.
4. The Budget Officer-V, Finance Department, Peshawar.
5. Master File.

Budget Officer-X.

17/10  
3/11/14

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR**

**OFFICE ORDER.**

Consequent upon of the Competent Authority Mst: Samina Lab: Attendent Govt.; Higher Secondary School Lady Griffith is hereby transferred/Adjusted at GGHS, Quaid Abad against the vacant post of Lab: Attendent on her own pay BPS in the interest of public service with immediate effect.

**Note:-**

1. No. TA/DA is allowed.
2. Charge repost should be submitted to all concerned.

(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR

Endst; No 560477

Dated Peshawar the 15/12 /2014

- Copy forwarded for information to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
  2. Principal GGHS, Lady Griffith Peshawar.
  3. Headmistress, GGHS, Quaid AbAD.
  4. Official concerned.

(S)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

APPOINTMENT /

Consequent upon the approval of the Departmental Selection Committee in its meeting held on 2.1.2015, the competent authority is pleased to appoint Abid Habib S/O Gul Habib Lab Attendant GGHSS Lady Griffith Peshawar BPS-01 (Rs. 4900-170-10000) plus usual allowances under deceased/Retired son/landowner/disabled as admissible under the rules against the vacant post with effect from the date of his/her taking over charge on the following terms and condition.

TERMS & CONDITION.


1. He/She will be governed by such rules and regulations as may be prescribed by the Govt from time to time for the category of the Govt servant to which he/she belongs.
2. His/Her service will be liable to termination at any time/state without any notice.
3. In case of resignation one month's prior notice should be given by the official concerned otherwise one month pay will be forfeited in lieu thereof in the Govt Treasury.
4. His/Her service is on purely temporary basis and liable to termination/reversion at any state without assigning any notice/reason.
5. He/She will produce Health and age certificate from the Civil Surgeon concerned before taking over charge.
6. Charge report should be submitted to all concerned.
7. No TA/DA etc is allowed being 1st appointment.
8. NOTE: Their appointment order shall be verified by the concerned DDO personally from the office of the DEO(F) Peshawar before handing over charge to the official.

(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR  
Dated Peshawar the 1/1 /2015. ✓

Endst No. 984-88 / F.No. Apptt C.IV/2015

Copy for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director of Elementary and Secondary Education KPK Peshawar.
3. Principal/Headmistress concerned.
4. Supdt Estab Local office.
5. Cashier Local Office.
6. Official concerned.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR.

Need for convergence  
Grade I B/P is 4800 -  
In this order you have PRINCIPAL  
4900 please insert Govt: Girls Higher  
Secondary School

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Office Order.

In supersession of this office order issued under this office No. 4014-20 dated 22.10, the transfers/adjustment in r/o. following class IV servants are hereby order on their own Pay/BPS with immediate effect in the interest of public service.

S.#	Name/Design:	From	To	Remarks
1	Nawaz Hussain Sweeper	GGHS Qaidabad Peshawar	GGCHSS Peshawar	Saleem Lab Attdt: shall keep continue at his original station GTHSS as usual
2	Imran Lab Attendant	GTHSS Gul Bahar Peshawar	GHSS No. 1 Peshawar city.	Against vacant Naib Qasid post.

Note:-

1. Compliance report should be submitted to all concerned.
2. No TA/DA etc is allowed.

**DIRECTOR**

Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar ✓

Endst: No. 451-52/A-2/C-IV/Complaint Comprehensive Dated Peshawar the 4/11/2015.

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male) Peshawar.
3. District Education Officer (Female) Peshawar.
4. Principals/HM concerned.
5. Official concerned.
6. Master File.
7. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

*M. M. M. 21/11/2015*  
Assistant Director (Admn)

Directorate of Elementary & Secy: Education  
Khyber Pakhtunkhwa, Peshawar

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

APPEAL NO. 218 /2015.

Mohammad Naveed.

Vs

Education Deptt:

**INDEX.**

S.NO	DOCUMENTS	ANNEXURE	PAGES.
1-	Memo of appeal.	---	1 - 5
2-	Appointment order	<b>A</b>	6
3-	Pay bill.	<b>B</b>	7
4-	Leave grant order. 27.03.02	<b>C</b>	8
5-	Leave grant order 23.09.02	<b>D</b>	9
6-	Arrival report. 6.05.2013	<b>E</b>	10
7-	Inquiry order 22.7.2013	<b>F</b>	11
8-	Inquiry report.	<b>G</b>	12 - 16
9-	Adjustment order 29.11.2013	<b>H</b>	17
10-	Arrival report.	<b>I</b>	18
11-	Application.	<b>J</b>	19
12-	Order 12.12.2013	<b>K</b>	20
13-	Appeal	<b>L</b>	21
14-	Vakalat nama	---	22

APPELLANT

THROUGH;

  
M.ASIF YOUSAFZAI

&

  
TAIMUR ALI KHAN

ADVOCATES, PESHAWAR.

I

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

APPEAL NO. 218 /2015.

K.P. Province  
Service Tribunal  
Diary No 150  
dated 23-2-2015

Mohammad Naveed,

(presently working as Mali)

GHSS Lady Griffith, Peshawar.....Appellant.

VERSUS

- 1- The Secretary Education (E&SE) Peshawar.
- 2- The Director Education,(E&SE), Peshawar.
- 3- The Distt: education Officer,(Female) Peshawar.
- 4- The Distt: Accounts Officer Peshawar.....Respondents.

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL**  
**FOR DIRECTING THE RESPONDENTS TO GRANT MONTHLY**  
**SALARIES TO THE APPELLANT W.E.FROM 30.11.2013 TILL**  
**DATE AND ONWARDS AND FOR PROPER ADJUSTMENT**  
**AGAINST HIS ORIGINAL CADRE POST OF LAB: ATTENDANT**  
**AND AGAINST NOT TAKING ANY ACTION ON THE**  
**DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE**  
**STATUTORY PERIOD.**

**PRAYER:**

That on acceptance of this appeal the respondents may very graciously be directed to grant monthly salaries to the appellant w.e.from 30.11.2013 till date & onwards and to adjust the appellant against his original cadre post of Lab:

Filed to-  
Registrar  
23/2/15

Re-submitted to-  
and filed.

Registrar  
13/3/15

Attendant. Any other remedy which this august Tribunal deems proper that may also be awarded in favour of appellant.

**R.SHEWETH.**

1. That the appellant was appointed as Lab: attendant in the GGHSS lady Griffith Peshawar by the competent authority vide order dated. 01.10.1996. Copies of order and pay slip is attached as Annexure – A & B.
2. That in the year the appellant suffered from sever illness and he was granted medical leave and other kind of leave on 27.03.2002. As the appellant also met with an accident during illness, therefore he went abroad for treatment of pelvic bones and for that purpose the appellant was also granted Ex-Pakistan leave of 730 days vide order dated. 23.09.2002. Copies of the orders are attached as Annexure – C&D.
3. That the appellant's treatment remained continued abroad at Saudi German Hospitals Group Jeddah, and after gaining health, the appellant reported his arrival vide application dated. 06.05.2013. The said application was brought into the information of the Director Education who ordered to inquire the matter through an inquiry officer ( Ali Badshah, Principal) vide order dated. 22.07.2013. Copies of application and inquiry order are attached as Annexure – E&F.
4. That the inquiry officer inquired the matter and recommended that since no action has been taken against the appellant by the authority in time, therefore, he should be adjusted by treating his absence period as E.O.L without pay. Further no

leave should be granted to appellant for the next five years in future. Copy of the inquiry report is attached as Annexure – G.

5. That on the recommendations of the inquiry officer, the appellant was adjusted vide order dated. 29.11.2013 but against the post of Mali in the GHSS Lady Griffith Peshawar. The appellant resumed the duty on 30.11.2013 and also requested for adjustment w.e.from the date of arrival (6.5.2013) till 29.11.2013 for the purpose of pay to recover the gap between the date of arrival and adjustment order. Thus vide order dated. 12.12.2013, the appellant was also adjusted w.e.from 6.5.2013 to 29.11.2013 for the purpose of pay to regularize the period between arrival and adjustment order. Copies of order, arrival report, application and order are attached as Annexure – H,I,J,K.
6. That since the appellant has been performing his duties regularly since adjustment as Mali but despite that the appellant has not been granted monthly salaries. Therefore, the appellant made several applications for payment of salaries and adjustment against his original cadre post but in vain and no heed was paid to the genuine requests of appellant. Thus finally the appellant preferred a departmental appeal for his claim on 24.10.2014 and waited for statutory period of ninety days but no reply has been received to appellant so far. Hence the present appeal on the following grounds amongst the others. Copy of appeal is attaché as Annexure – L.



4

**GROUND:**

- A. That not paying monthly salaries to appellant despite performing duties and not taking any action on his appeal is against the law, facts, norms of justice and material on record, therefore, not tenable.
- B. That the appellant has not been treated according to law and rules and has been kept deprived from his legal rights of pay and adjustment against his original cadre post.
- C. That not paying monthly salaries to appellant despite performing duties amounts to forced labour which is prohibited under the Constitution of Pakistan 1973, article -11. Similarly the conduct of the respondents is also violative to the Article 9 of the Constitution because due to inaction, nonpayment of salaries, the life of the appellant is affecting adversely.
- D. That even the change of cadre of appellant is violative to the Rules and law because no prior notice or option was given to appellant and as such the appellant has been condemned unheard in this regard.
- E. That the appellant is the employee of the Education Deptt: and under section 17 of the Civil servants act 1973, the pay of post is the legal right of appellant which cannot be denied at any cost.
- F. That the appellant has a genuine claim and he is legally entitled for his claims.

G. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, mot humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT

*Muawid*  
MOHAMMAD NAVEED

THROUGH;

*Asif*  
M.ASIF YOUSAFZAI

&

*Taimur*  
TAIMUR ALI KHAN

ADVOCATES, PESHAWAR.

OFFICE OF THE DIVL. DIRECTOR OF EDUCATION(S) PESHAWAR DIVISION PESHAWAR.

APPOINTMENT

Appointment of the following person(s) is hereby ordered, against the post of L.I./Aid. at Rs: 1245/- fixed plus usual allowances as admissible under the rules in BPS 1 (Rs; 1245-35-1770) at the Institution noted against each name.

S.No:	Name, Qualification & Address	Posted at	Remarks.
	Mohammad Naveed S/O Mohammad Sharif Malan R/O Peshawar	Lady Griffith	Agreed Naveed L.I./Aid. post

TERMS & CONDITIONS

1. His/Her appointment is purely temporary & liable to termination at any time without assigning reasons OR notice.
2. In case of resignation he/she will have to submit one Month's prior notice to the Deptt; OR forfeit one month's pay in lieu thereof to the Govt;.
3. He/She is required to produce health & age certificate from the Medical authority concerned before taking over charge provide he/she is not in Govt; service.
4. He/She should not be allowed to take over charge if his/her age is less than 17 years OR above 33 + 2 years (40 years).
5. His/her appointment is subject to further condition that he/she is Domiciled of NWFP.
6. All original Educational character & domicile certificates should be thoroughly checked before handing over charge, if necessary it should be verified from the Institutions concerned.
7. If he/she fails to take over charge of the post within 15 days of the receipt of this order the offer of appointment shall stand cancelled.
8. Charge reports should be submitted to all concerned.
9. No TA/DA etc. is allowed.
10. He/she should be given test in Nazira Quran & Pakistan Studies & result intimated to this office.

(MOHAMMAD ZAMAN KHAN)  
DIVL. DIRECTOR OF EDUCATION(SCHOOLS),  
PESHAWAR DIVISION PESHAWAR.

Enst; No: 35-40 / Dated Peshawar the 1-10 / 1996.

- Copy to the:-
1. DEO(M) (F) Secy; Peshawar
  2. AG, NWFP, Peshawar/DAO, Charsadda/Nowshera.
  3. Principal/Headmaster/Headmistress, Lady Griffith
  4. Candidate concerned.
  5. Supdt; E/Branch.
  6. P/File.

for Divl; Director of Education(Schools);  
Peshawar Division Peshawar.

BERLANZEB  
ICUSAFZAI

ATTESTED

*(Signature)*

**OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION (S)**  
**PESHAWAR DIVISION PESHAWAR.**

**APPOINTMENT**

Appointment of the following person(s) is hereby ordered against the post of Lab; Attendant at Rs: 1245/- plus usual allowances as admissible under the rules in BPS-4 (Rs.1245-35-1770) at the Institution noted against each name:

<b><u>S.NO.</u></b>	<b><u>Name, Qualification &amp; Address</u></b>	<b><u>Posted at</u></b>	<b><u>Remarks</u></b>
1.	Muhammad Naveed S/O Muhammad Sharif Matra.	GGHSS, Lady Grifith.	Against newly Created L/Attendant

**Terms & Conditions:**

1. His/her appointment is purely temporary and liable to termination at any time without assigning reasons or notice.
2. In case of resignation he/she will have to submit one Month's prior notice to the Department or forfeit one month's pay in lieu thereof to the government.
3. He/she is required to produce health and age certificates from the Medical authority concerned before taking over charge provide he/she is not in government service.
4. He/she should not be allowed to take over charge if his/her age is less than 14 years or about 30 + 2 years (40 years).
5. His/her appointment is subject to further condition that he /she is domiciled of NWFP.
6. All original Educational character and domicile certificates should be thoroughly checked before handing over charge, if necessary it should be verified from the institutions concerned.
7. If he/she fails to take over charge of the post within 15 days of the receipt of this order the offer of appointment shall stand cancelled.
8. Charge reports should be submitted to all concerned.
9. No TA/DA etc is allowed.
10. He/she should be given test in Nazira Quran and Pakistan Studies and result intimated to this office.

Sd/-

Divisional Director of Education  
(Schools) Peshawar Div;Pesh;

Endst. No.35-40/

Dated Peshawar, the 01.10.1996.

Copy to the:

1. DEO (M), (F), Secy; Peshawar.
2. AG NWFP, Peshawar/DAO Charsadda/Nowshera.
3. Principle / Headmaster/Headmistress, GGHSS, Lady Grifith.
4. Candidate concerned.
5. Superintendent E/Branch.
6. P/File.



GOVERNMENT OF PAKISTAN  
 ACCOUNTANT GENERAL N.W.F.P  
 DISTRICT  
 PAY ROLL SYSTEM

PAGE NO: 661

**PAYMENT ADVICE**

PAYROLL 6 DECEMBER 2001

**B**  
**7**

99-92-438597

MOHAMAMD NAVED  
 LABORATORY ATTEN ENT

PRINCIPAL GGHS LADY GRIFTH...  
 SECONDARY EDUCATION NON-SAP

BPS 01 N.T.N. 0 00 000000

N DEPTT CODE 04347 247

<b>PAYMENTS</b> 001 B PAY 2255.00 134 H R A 414.00 175 MED ALL 160.00 133 SPL ADD AL 311.00 131 C A 170.00 <b>TOTAL *** 3310.00</b>		
<b>DEDUCTIONS/RE OVERIES</b> 381 B FUND 337 E W F 385 G P FUND 368 G P F ADV-1 BALANCE 15.00 2.00 2912.00 1700.00 <b>TOTAL *** 202.00</b>		EDU 043976 2912.00 1700.00
<b>NET AMOUNT PAYABLE</b>		3108.00
QUALIFYING SERVICE 05 YRS 060 MONTH	CASH PAYMENT THRU DEPT	

*4900/-190-*

OFFICE OF THE PRINCIPAL GOVERNMENT GIRLS HIGHER SECONDARY SCHOOL LADY GRIFFIN PESHAWAR.

SANCTION FOR THE GRANT OF MEDICAL LEAVE  
EARNED LEAVE. :-

Under the provision of Medical Leave revised rules 1981, sanction is hereby accorded for the grant of Medical leave and earned leave without pay in respect of Mohammad Naweed Laboratory Attendant of this school detail given below.

S.No	Period of Leave	Nature of Leave	Remarks
1.	1/12/2001 to 14/12/2001	Medical Leave	14 days.
2.	22/12/2001 to 21/01/2002	Medical Leave	30 Days.
3.	15/12/2001 to 21/12/2001	Earned leave.	7 Days.
4.	24/1/2002 to 25/02/2002	Earned leave	31 Days.
5.	24/2/2002 to 23/5/2002	90 Days E.O.L.	

Note:-

Necessary entries should be made in his service book.

(MUSARRAT PARVEEN QADRI)  
PRINCIPAL  
GHS LADY GRIFFIN PESHAWAR

Encl: No 1293-94 Dated. 27/3 March 2002.

Copy for information to the:-

- The Executive District Officer (Lits & Edu.) Peshawar.
- The Accountant General N.W.F.P. Peshawar.

SABIR.+++++

26th Mar: 2002.

PRINCIPAL  
Govt. Girls Higher Secondary  
School Lady Griffin  
Peshawar

PRINCIPAL  
GOVERNMENT GIRLS HIGHER SECY  
SCHOOL LADY GRIFFIN PESHAWAR

27/3/02

ATTESTED

OFFICE OF THE PRINCIPAL GOVERNMENT GIRLS HIGHER SECONDARY SCHOOL LADY GRIFFIN PESHAWAR.  
GRANT OF EX-PAKISTAN LEAVE:\*

R

Under the provision Rules 20-A-B of Govt:of N.W.F.P. Servant revised rules 1981. sanction is hereby accorded for the grant of Ex- Pakistan leave with effect from 24/05-2002 to 25/05/2004 750 Days without pay to Mr Mohammad Naveed Laboratory Attendent of this school.

Note:- Entry should made in his s/Book.

(MUSSARAT PARVEEN QAZI)  
PRINCIPAL  
GOVT GIRLS HIGHER SECY SCHOOL  
LADY GRIFFIN PESHAWAR.

ENDT: NO 1399-11/1 Dated. 23rd Sep 2002.

Copy for information to the:-

1. The Executive Distt: Officer (Lit:Edu:) Peshawar with her ref: No 2034 Dated: 17/6/2002.
2. The Accountant General N.W.F.P. Peshawar.
3. Cashier local office.

SABIR

Stamp: GOVERNMENT GIRLS HIGHER SECONDARY SCHOOL LADY GRIFFIN PESHAWAR. DATED 28-9-2002

PRINCIPAL  
GOVT GIRLS HIGHER SECONDARY SCHOOL  
LADY GRIFFIN PESHAWAR.

PRINCIPAL  
Govt Girls Higher Secondary  
School Ladygriffin  
Peshawar

Handwritten marks and scribbles at the bottom of the page.

BETTER COPY

ANNEXURE-D

PAGE-09

**OFFICE OF THE PRINCIPAL, GOVERNMENT GIRLS HIGHER  
SECONDARY SCHOOL, LADY GRIFTH PESHAWAR.**

**GRANT OF EX-PAKISTAN LEAVE:**

Under the provision Rules 20-A-B of Government of NWFP, Servant revised rules, 1981, sanction is hereby accorded for the grant of Ex-Pakistan Leave with effect from 24.5.2002 to 25.05.2004, 730 Days without pay to Mr. Muhammad Naveed Laboratory Attendant of this school.

Note: Entry should made in his S/Book.

Sd/- (Mussarat Perveen Qazi )  
Principal, GGHSS, Lady Grifh, Peshawar.

Endst. No.1399-1400;

Dated 23<sup>rd</sup> September, 2002.

Copy for information to the:

1. The Executive District Officer, (Lit: Edu), Peshawar with her ref: No.2034; dated 17.06.2002.
2. The Accountant General, NWFP, Peshawar.
3. Cashier Local office.



خدمت جناب ڈسٹرک ایجنٹیشن آفسیر فیملی پیسار

جناب عالیہ :

لذا عرض ہے کہ میں نے 2002 میں ہونے والے پاکستان ایسوسی ایشن

لیڈ میں سمنٹ بیماری میں مبتلا تھا اور میرا اسپیدنٹ میں ہو

گیا۔ جسکی وجہ سے میری سالانہ بدنی صحت خراب ہو گیا۔ ہڈیاں

ٹوٹ گئے۔ جسکی وجہ سے میں اپنا ڈیوٹی سرانجام نہیں دے سکتا تھا

اب میں صحت یاب ہو گیا۔ لیڈا میں اپنا ڈیوٹی کرنا چاہتا ہوں۔

جناب عالیہ میرے پانچ بچے ہیں۔ لیڈا ابھی میرا کوئی ذریعہ معاش

نہیں ہے۔ لیڈا میرا بانی کرتے میری ایڈجسٹمنٹ لیڈی گورنمنٹ کونز

یا ٹرسٹنگ ڈرامی سکول میں ~~میں~~ <sup>میں</sup> عالی پوسٹ پر کروائیں۔

میں آپ کی عمر میری ماٹرن ریوٹا۔ بلدیج کی فولڈوٹوٹو

درخواست کے ساتھ منسلک ہے۔

آپ کا تابعدار محمد نوید ولد محمد شریف

سابقہ گورنمنٹ کونز یا ٹرسٹنگ ڈرامی

سکول لیڈی گورنمنٹ پیسار

سائپ پوسٹ ٹیبل رٹنڈ

محمد نوید

محمد رفیق 6/5/13  
Attestation  
6/5/13

ATTESTED

A

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Notification.

The Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar has been pleased to appoint Mr. Ali Bacha Principal Govt: High School PAF Shaheen Camp Peshawar as enquiry officer to inquire into the matter regarding grant of leave/adjustment case in respect of Mohammad Naveed Ex Lab Attendant GGHS: Lady Griffith Peshawar. (Copy attached).

DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

3201-3  
Endst: No. \_\_\_\_\_/A-20/Class IV/Peshawar Dated Peshawar the 22/7/07/2013.

Copy forwarded to the: -

1. Mr. Ali Bacha Principal, GHS: PAF Shaheen Camp Peshawar with the remarks to submit report within 10 days.
2. District Education Officer (Female) Peshawar.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

*Aslam Khan*  
*22/7/13.*  
*ii*  
*22/7/13*  
Deputy Director (F&A)  
Directorate E&SE, Khyber Pakhtunkhwa  
Peshawar.  
*M/A*

**ATTESTED**

Q-4  
8/11/13

9  
12

To  
The District Education Officer  
(Female) Peshawar.

Subject: ENQUIRY REPORT.

Memo:

I am directed to refer to your letter No. 22 dated 4.7.2013 on the subject noted above and to enclose herewith the enquiry report in respect of Mr. Muhammad Naveed s/o Muhammad Sharif Ex-Laboratory Attendant CGHSS Lady Griffith Peshawar for implementation of recommendations of the enquiry officer under intimation to all concerned.

*[Signature]*  
Assistant Director (Admin)  
Directorate of E& Secy Education  
Khyber Pakhtunkhwa, Peshawar.

Endst; No. 1  
Copy forwarded to the:-  
1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

*[Signature]*  
Assistant Director (Admin)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

1264  
11/11/13

ATTACHED

*[Signature]*

BETTER COPY

ANNEXURE-G

PAGE-12

Office of the Assistant Director  
(Admn:), Directorate of E&SE,  
Khyber Pakhtunkhwa, Peshawar.

No.663/A-20/C-IV/Peshawar/KC;  
Dated Pesh; the 7.11.2013.

To

The District Education Officer,  
(Female), Peshawar.

Subject: **Enquiry Report**

Memo:

I am directed to refer to your letter No.22; dated 4.7.2013 on the subject noted above and to enclose herewith the enquiry report in respect of Mr. Muhammad Naveed s/o Muhammad Sharif, Ex-Laboratory Attendant, GGHSS, Lady Grifh, Peshawar for implementation of recommendation of the enquiry officer under intimation to all concerned.

Sd/- Assistant Director (Admn:)  
Directorate of E& Secy: Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst. No. \_\_\_\_\_/

Copy forwarded to the :

1. PA to Director, E&SE, KP, Peshawar.

Sd/- Assistant Director (Admn:)  
Directorate of E& Secy: Education,  
Khyber Pakhtunkhwa, Peshawar.

F-NO Enquiry Peshawar  
NO. 2 Dated 24-9-013

13

To

The Director,  
(Elec:& Secy:)Education  
Khyber Pakhtunkhwa Peshawar.

Subject; Enquiry about the grant of leave / adjustment case in respect of  
Mr Muhammad Naveed Ex- lab: Attendant GGHSS Lady  
Griffth Peshawar.

Memo:-

Ref your Endst: No 3201-3/A-20/Class iv/Peshawar  
dated Peshawar 22-7-2013 on the subject cited above and to enclose  
the enquiry report in respect of Mr Muhammad Naveed s/o  
Muhammad Sharif for further necessary action please.

Principal

*Ali Badshah*  
Ali Badshah

GHS PAF Shaheen Camp  
Peshawar Cantt:

*A*

OFFICE OF THE PRINCIPAL GHS PAF SHAHEEN CAMP PESHAWAR  
ENQUIRY REPORT

ENQUIRY OFFICER.

The undersigned was appointed as Enquiry officer by the Director E&SE Peshawar vide Notification 3201-3/A-20/Class-IV/Peshawar dated 22-07-2013 to conduct fact finding Enquiry against Muhammad Naveed Lab Att: GGHS Lady Griffith Peshawar (Annex-A).

AUTHORITY.

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification 3201-3/A-20/Class-IV/Peshawar dated 22-07-2013.

NATURE OF ENQUIRY.

Enquiry about the grant of leave / adjustment case in respect of Mr Muhammad Naveed Ex-Lab Attendant GGHS Lady Griffith Peshawar.

PLACE OF ENQUIRY

1. District Education Office (F) Peshawar.
2. GGHS Lady Griffith Peshawar.

BACKGROUND OF THE ENQUIRY:

One Mr. Muhammad Naveed was appointed as lab attendant at GGHS Lady Griffith Peshawar on newly created post vide Divisional Director of education school Peshawar Division Peshawar Endst: No- 35-40 dated 1-10-1996. He worked for the following period w.e.f 02-11-1996 up to 31-12-2001 regularly. He applied for medical and earned leave.

- |                               |                            |
|-------------------------------|----------------------------|
| From 01-12-2001 to 14-12-2001 | 14 days on medical grounds |
| From 22-12-2001 to 21-1-2002  | 30 days as earned leave.   |

The sanction of the above period was granted by the concerned Principal of the school. The sanction of the following periods for medical and earned leave with out pay was also accorded by the principal as per detail given below:

- |                               |           |
|-------------------------------|-----------|
| From 15-12-2001 to 21-12-2001 | (17 days) |
| From 24-1-2002 to 23-02-2002  | (31 days) |
| From 24-02-2002 to 23-5-2002  | (42 days) |

(17+31+42) i.e. (90 days) vide Sanction No 1293-94 dated 27-03-2002.  
Final Enquiry Mr Muhammad Naveed Lab Att GGHS Lady Griffith.doc.

**ATTACHED**

(15)

The sanction of Ex- Pakistan leave was accorded by the Principal with out pay vide office No- 1399-1400 dated 23-9-2002 starting form 24-05-2002 to 24-05-2004 (Total 730 days). He was on earned leave, medical leave, Ex-Pakistan leave. He was absent from the service from 25-05-2004 till 05-05-2013. The Mr. Muhammad Naveed submitted an application on 06-05-2013 for arrival against his post at GGHS Lady Griffith Peshawar but no action has been taken against his application.

PROCEEDING:

Questionnaires were observed upon the following officers / officials.

1. The District Education Officer (F) Peshawar. (Annex B)
2. The Principal GGHS Lady Griffith Peshawar. (Annex C)
3. Muhammad Naveed Lab Atd:/Official concerned. (Annex D)

ANALYSIS OF THE STATEMENT:

Reply of the questionnaire submitted by the DEO(F) Peshawar (Annex E).

1. She stated that his service book was present in the office but it was not maintained because the principal had not reported in time. No other record is available.
2. The DEO (F) Peshawar further stated that the service book of the official was sometime in the office and some time in the school.

Reply of the questionnaire submitted by the Principal GGHS Lady Griffith Peshawar (Annex F).

1. According to the statement of the Principal no proper record was available in the office even that the service book was also in the custody of the DEO (F) Peshawar.
2. The case was submitted to the DEO office for further sanction of Ex- Pakistan leave vide this office letter # 1399-1400 dated 17-9-2002.

Reply of the questionnaire submitted by Mr. Muhammad Naveed Lab Atd/official concerned (Annex G).

1. The official concerned stated that he had submitted the applications several times. Two times sanction was accorded by the principal.
2. That he was under the treatment abroad so he had sent / submitted applications for leave but no record was maintained by the office.
3. That the sanction was accorded by the principal of the school w.e.f 1-12-2001 to 14-12 2001 (14 days) and 22-12-2001 to 21-01-2002(30 days) on medical and earned leave respectively. She had sanction

**ATTESTED**



(16) 67/2002 (2)

medical and earned leave with out pay w.e.f 15-12-2001 to 21-12-2001 and 21-01-2002 to 23-02-2002 and 21-02-2002 to 23-05-2002 (17+31+42) i.e. (90 days) vide order No. 1293-91 dated 27<sup>th</sup> march 2002.

- 4. The official also submitted an application for medical leave as reflected in the letter of the principal CGHSS Lady Griffith Peshawar.
- 5. The official also submitted an application for adjustment on dated 1-10-2006. The case of adjustment was forwarded by the principal to the DEO (F) Peshawar office No. 585 dated Peshawar 19-11-2006.
- 6. The official did not pursue his case properly in time for leave as well as for arrival / adjustment.

**FINDINGS.**

Having gone through the record described above and carrying out investigations in the matter the under signed reached to the conclusions that:-

- 1. There is no clear record about the sanction & absenteeism of Mr. Muhammad Naveed Lab. Attendant CGHSS Lady Griffith Peshawar in the office of the DEO(F) Peshawar as well as in the office of the Principal CGHSS Lady Griffith Peshawar.
- 2. The competent authority had not taken proper action against him in time.
- 3. The incumbent did not take interest for taking over charge of his post in time properly.

**RECOMMENDATIONS, SUGGESTION**

- It is suggested that:-
- 1. He may be ~~reinstated~~ <sup>adjusted with pay</sup> against his post <sup>Govt. Central Model School Peshawar Cantt</sup> without any back benefit as no action has been taken by the competent authority.
  - 2. His absence period may be converted into leave without pay.
  - 3. All entries may be made in his service book accordingly.
  - 4. The competent authority may not grant him any kind of leave for the next five years.

PRINCIPAL  
Govt. Central Model  
School Peshawar Cantt

*Ali Iqbal Shah*  
Ali Iqbal Shah  
Principal GHS PAF Shaheen Camp  
Peshawar.

**ATTESTED**



H  
17

ADJUSTMENT/

Consequent upon the recommendation of the enquiry officer conveyed by the Director Elementary & Secondary Education Khyber Pakhtun Khwa vide letter No.663/A-20/C-IV/Peshawar/KC dated 07/11/2013, Mr. Muhammad Naveed S/O Muhammad Sharif Ex-Laboratory Attendant GGHSS Lady Griffith Peshawar is hereby adjusted against vacant post of Mali at GGHSS Lady Griffith Peshawar with immediate effect with out any back benefit.

His absence period w.e.f. 26/05/2004 to 05/05/2013 is hereby converted into leave with out pay.

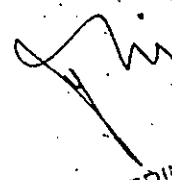
- Note:-
1. Necessary entry to this effect should be made in her service book.
  2. He will not apply for any kind of leave for the next five years.


(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR


Endst. No. 5026-30 P.F. M. Naveed L/Attd. dated 29/11 /2013.

Copy of the above is forwarded to the :-

1. Accountant General Khyber Pakhtun Khwa Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtun Khwa vide letter No.663/A-20/C-IV/Peshawar/KC dated 07/11/2013
3. Principal/Head Mistress concerned along with service book.
4. Official concerned.
5. Cashier local office.

  
PRINCIPAL  
Govt. Girls Higher School  
School Lady Griffith  
Peshawar

  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

ATTENDED  


**(TO BE SUBSTITUTED BY EVEN NO. AND DATE)**  
**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE),**  
**PESHAWAR.**

**ADJUSTMENT:**

Consequent upon the recommendation of the enquiry officer conveyed by the Director E&SE, KP, vide letter No.663/A-20/C-IV/Peshawar/KC; dated 07.11.2013, Mr. Muhammad Naveed S/O Muhammad Sharif, Ex-Lab; Attendant, GGHSS, Lady Grifh, Peshawar is hereby adjusted against vacant post of Mali at GGHSS, Lady Grifh, Peshawar, with immediate effect without any back benefits.

His absence period w.e.f. 26.05.2004 to 05.05.2013 is hereby converted into leave without pay.

**Note:**

1. Necessary entry to this effect should be made in her service book.
2. He will not apply for any kind of leave for the next five years.

Sd/- (Samina Ghani )  
District Education Officer(F),  
E&SE, Peshawar.

Endst. No.5026-30/P.F. M. Naveed, L/Attd; Dated 29.11.2013.

Copy of the above is forwarded to the:

1. AG, KPK, Peshawar.
2. Director, E&SE, KP, vide letter No.663/A-20/C-IV/Peshawar/K.C; dated 07.11.2013.
3. Principal/Head Mistress concerned along with service book.
4. Official concerned.
5. Cashier local office.

Sd/- ( Samina Ghani )  
District Education Officer(F),  
E&SE, Peshawar.

مستور جناب ڈسٹرک ایجوکیشن آفیسر ضمیل بیٹا

درخواست برائے (Adjustment Propose for pay)

جناب عالیہ

گزارش ہے کہ میں نے 6-5-2013 کو فاسر بنو اور نوکری اپلائی کرنے کے لیے

درخواست دیا اور میرا ایڈجسٹمنٹ لیڈی ٹرفک یا ٹرسٹڈری سکول میں

29-11-2013 کو تو 191 میرے جیسے میں لیڈ آف صاحبان میرا ماں فرما کہ مجھے

اس سے پہلے لیڈ 6-5-2013 to 29-11-2013 Adjustement Propose for pay کرنے

میں مگر میرا آپ لوگوں دیا توں وقتاً

العارض

مخبر 1-12-2013

آپ کا بعد از محمد نوید ولد محمد شریف

یا ٹرسٹڈری سکول لیڈی ٹرفک بیٹا

ATTESTED

Handwritten signature



DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER/

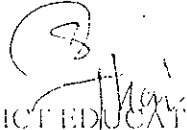
Mr. Mohammad Naveed Mali GGHSS Lady Griffith Peshawar is hereby adjusted only for the purpose of pay for the period 06/05/2013 to 29/11/2013 at GGMS Haryana Bala Peshawar against vacant post of Naib Qasid.


(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

Endst: No. 5426-89 /P.F. Naveed, Mali dated 12/12/2013.

Copy of the above is forwarded to the :-

1. Accountant General Khyber Pakhtun Khwa Peshawar.
2. Director E & S Education Khyber Pakhtun Khwa Peshawar.
3. Principal/Head Mistress concerned.
4. Official concerned.
5. B & A O local office.

  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

  
PRINCIPAL  
Govt. Girls Higher Secondary  
School Ladygriffith  
Peshawar

ATTESTED



بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (زنانه) پشاور  
 عنوان: محکمانہ اپیل برائے تنخواہ اور واجبات واصل یعنی اور بیجنل پوسٹ لیب اٹینڈنٹ

2

جناب عالی!

گزارش ہے کہ میں نے 25/05/2002 Ex: Pakistan Leave تا 25/05/2004 لیا تھا  
 (کاپی لف ہے) اور بعد میں، میں بیمار ہوا تھا۔ 06/05/2013 کو میں نے ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ (فی میل) کو  
 (Arrival) کی اور ایڈجسٹمنٹ کیلئے درخواست دی۔ اسکے بعد ڈیپارٹمنٹ نے انکوائری کی (انکوائری کی رپورٹ لف  
 ہے)۔ انکوائری رپورٹ کے بعد مجھے 29/11/2013 کو ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) نے گورنمنٹ گرلز ہائر  
 سیکنڈری سکول لیڈی گرفتھ پشاور میں مالی کی پوسٹ پر ایڈجسٹ کیا۔ آرڈر نمبر 5026-30 PF.M.Naveed  
 L/ATT کاپی درخواست کیساتھ لف ہے) اور 30/11/2013 کو سائل نے گورنمنٹ گرلز ہائر سیکنڈری سکول لیڈی  
 گرفتھ پشاور میں دیوٹی جان کی۔ اور میں اپنی ڈیوٹی بخوبی سرانجام دے رہا ہوں۔ اور کبھی کسی کوشکایت کا موقع نہیں  
 دیا۔ سائل ایک غریب آدمی ہے۔ سائل کے پانچ چھوٹے بچے ہیں اور کوئی ذریعہ معاش نہیں ہے۔ والد صاحب بھی ضعیف  
 العمر ہیں۔ گھر کا سارا بوجھ میرے کندھوں پر ہے۔ 30/11/2013 سے لیکر اب تک مجھے تنخواہ اور بقایا جات کی کوئی  
 ادائیگی نہیں کی گئی۔ جسکی وجہ سے مجھے زیادہ مالی پریشانیاں لاحق ہیں۔ موجودہ مہنگائی کے دور میں میرا جینا مشکل ہو گیا۔ بلکہ  
 میرے لئے ذہنی ٹینشن بن چکا ہے۔

لہذا استدعا کی جاتی ہے کہ سائل اور اسکی فیملی پر رحم کیا جائے اور مجھے 30/11/2013 سے لیکر اب تک تمام  
 تنخواہیں بمشور بقایا جات یکمشت جاری فرمائی جائیں۔ میرا اور بیجنل پوسٹ لیب اٹینڈنٹ تھا لیکن ڈی ای او اور فی میل نے  
 مجھے مالی پوسٹ پر ایڈجسٹ کیا۔ لیکن پہلے DEO/F والے بولتے تھے کہ لیب اٹینڈنٹ کی خالی پوسٹ نہیں ہے۔ لہذا  
 استدعا کی جاتی ہے کہ اب مجھے اور بیجنل پوسٹ لیب اٹینڈنٹ پر ایڈجسٹ کیا جائے اور تنخواہ کے سارے بقایا جات دیئے  
 جائیں۔ میں عمر بھر دعا گور ہوں گا۔

العارض

عین نوازش ہوگی

محمد نوید (موجودہ مالی)

گورنمنٹ گرلز ہائر سیکنڈری سکول لیڈی گرفتھ پشاور

مورخہ 24/10/2014

۱۰۰-۶۸۵۱ dated 24.10.2014

Forwarded to D.E.O (F) Peshawar

Resubmitted on 27/10/2014  
 DEO/F Peshawar

PRINCIPAL  
 Govt. Girls High  
 Secondary School  
 Lady Grah

ATTESTED

# VAKALAT NAMA

NO. \_\_\_\_\_/20

IN THE COURT OF \* Service Tribunal Peshawar

Muhammed Naveed (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Education Dept. (Respondent)  
(Defendant)

I/We Muhammed Naveed (Appellant)

Do hereby appoint and constitute M. Asif Yousafzai, Advocate, Peshawar, <sup>§ Taimur Ali Khan (Adv)</sup>  
to appear, plead, act, compromise, withdraw or refer to arbitration for me/us  
as my/our Counsel/Advocate in the above noted matter, without any liability  
for his default and with the authority to engage/appoint any other Advocate/  
Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our  
behalf all sums and amounts payable or deposited on my/our account in the  
above noted matter. The Advocate/Counsel is also at liberty to leave my/our  
case at any stage of the proceedings, if his any fee left unpaid or is  
outstanding against me/us.

Dated \_\_\_\_\_/20

Muhammed  
( CLIENT )

ACCEPTED

M. ASIF YOUSAFZAI  
Advocate

**M. ASIF YOUSAFZAI**  
Advocate High Court,  
Peshawar.

**OFFICE:**

Room No.1, Upper Floor,  
Islamia Club Building,  
Khyber Bazar Peshawar.  
Ph.091-2211391-  
0333-9103240

§  
Taimur Ali Khan  
Adv.  
GOMER SAJJAD KHAN  
Adv.

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

**SERVICE APPEAL NO. 218-p/2015**

**Muhammad Naveed      V/S      GOVT.**

**Para wise reply on behalf of the Respondents 1,2 & 3**

Respectfully Sheweth:-

The Respondents submit below:-

**Preliminary objections:-**

1. That the Appellant has got no cause of action/ locus standi.
2. That the Appellant is estopped by his own conduct to file the instant Appeal.
3. That the instant appeal is badly time barred.
4. That the instant Appeal is not maintainable in its present form.
5. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary parties.
6. That the Appellant has not come to this Hon, able Tribunal with clean hands.
7. That the Appellant does not fall within the ambit of aggrieved person.
8. That the Departmental Appeal is badly time barred.
9. That there is no record of Departmental Appeal in the office of the Respondent No.4; hence the instant the Service Appeal is not maintainable.
10. That the instant appeal is barred by law.

**ON FACTS.**

1. That Para -1 is correct.
2. That Para – 2 is correct to the extent that the appellant was granted leave without pay w.e.f 24-05-2002 to 25-05-2004 while rest of the para is incorrect and denied. The appellant remained absent from service for unauthorized long period.
3. That Para – 3 is correct to the extent that the inquiry officer recommended him for adjustment.

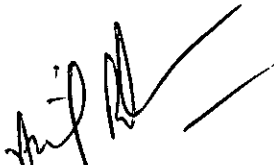
Furthermore, as there was no vacant post of Lab: Attendant, so this office adjusted him on the post of Mali in GGHSS, Lady Grifth Peshawar while rest of the para is denied.


4. That Para – 4 is correct.
5. That Para – 5 is also correct.
6. That the respondent No.3 has submitted the Bills to the office of the Accountant General for the release of pay but the matter is still pending in the office of the Accountant General. (Bills are attached)

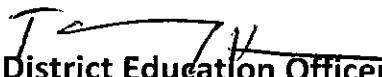
**Grounds:-**

- A. That Ground – A is incorrect and denied. The Respondent No.3 has submitted the Bills in respect of the appellant which are still pending in the office of the Respondent No.4.
- B. That Ground – B is incorrect and denied. The appellant shall be adjusted on his original post of Lab: Attendant when and where it becomes vacant. Moreover, at present there is no vacant post of Lab: Attendant with Respondent No.3
- C. That Ground – C is incorrect and denied. The appellant has been treated under the law, detail reply has been given in the above paras.
- D. That Ground – D is incorrect and denied. The appellant has been treated under the law.
- E. That the appellant has been treated under the law and his Bills for the release of pay has been submitted to the office of the Accountant General.
- F. That as per the recommendation of the inquiry officer, the appellant has been adjusted on the post of Mali in GGHS Lady Grifth Peshawar.
- G. That the Respondents also seek leave of this Hon' able Tribunal to raise additional Grounds and present case law at the time of arguments.

It is therefore, humbly prayed that on the acceptance of this reply, the appeal may be dismissed.

  
Secretary,  
KPK Peshawar

  
Director,  
(E & SE) KPK Peshawar

  
District Education Officer  
(Female) Peshawar



Arrears of pay and Allowance to Muhammad Naveed  
Mali, G.C. H.S.S 416 Peshawar

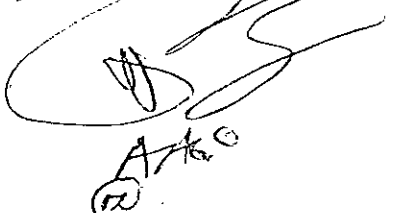
Period	Pay	HRA	C.A	Medical	Ad-10	Ad-14	Ad-12	Ad-13
	000	500	500	500	5898	5911	5938	
30 <sup>12</sup> / <sub>2013</sub> (one day)	200	45	57	33	60	29	39	30
12/2013 (one Month)	6000	1337	1700	1000	1800	878	1170	900
	6200	1382	1757	1033	1860	907	1209	990
(12/2014) one month	6000	1337	1700	1000	1800	878	1170	900
	12200	2719	3457	2033	3660	1785	2379	1830
				G.P.F	373 + 373 = 746			
				B.F	120 + 120 = 240			
				G.I.A	58 + 58 = 116			
				P.S.F	150 + 150 = 300			

Std.

① personal number of the employee is incorrect, note correct personal number.

\* ② Reason for stoppage of pay wef. 23/9/2002 may plz be noted.

\* ③ if the sub employee is suspended, then where is suspension entry, must be noted in service book.

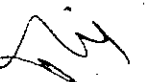
  
A.K.O.

24/10/11

① pay Roll for <sup>The month of 12/2011</sup> is attached. The P. No. maybe checked please & new succ-I for allotment personal No. is attached.

② The official ~~cancel~~ <sup>with out</sup> drawn his pay upto 12/2001 and 1/2002 to 25/2004 and 26/2004 to 5/2003 is hereby converted into leave with out pay vide D.E.O F No. 5026-30 dated 29/11/13.

③ The official concerned is not suspended he was on leave with out pay and Adjust on Service on 5.5.2013 by the D.E.O F No. 5026-30 dated 29.11.2013, Now the pay be started <sup>by the same order</sup>.



PRINCIPAL  
Govt. Girls Higher Secondary  
School Ladygriffh  
Peshawar

Please

20

Add any remarks.

and signature of person preparing this form.

and signature of person preparing this form.

and signature of person preparing this form.

and signature of person preparing this form.



Employee Master File Creation Form

Form: PAY01

(Applicable for both Payroll and GP Fund)

Employee ID (To be assigned by office)

Employee ID grid

01 OFFICE OF THE Principal
02 FOR THE MONTH OF 2 / 2004
03 DDO Code (Cost Center) PR7151 Description 04

PERSONNEL ACTIONS-INFO TYPE 00
05 Date of Entry (DD/MM/YYYY) 02/11/1996
06 Current Govt. Provincial Govt.
07 Employee group M
08 Employee grade (Sub. Group) 01 Mali
09 Employee NIC Number 75307-11473858-7
10 DOB (DD/MM/YYYY) 15/11/1974
11 Date of entry into Govt service (DD/MM/YYYY) 02/11/1996
12 Reason for action for New P. No. and Statung of Pay

PERSONNEL DATA - INFO TYPE 0002
13 Title Mr Miss Ms Mrs
14 Last name MUKIYED
15 First name MUTEHAMMAD
16 Father/Husband name MUTEHAMMAD SHARIF
17 District of domicile Karachi
18 Marital status Marriage
19 City of Birth Karachi
20 Date of Marriage/Divce (if applicable) DD/MM/YYYY 01/11/1998
21 Province of Domicile K.P.K (NWFP)
22 No. of dependents 07
23 Nationality Pakistani
24 Religion Islam

ORGANISATIONAL ASSIGNMENT - INFO TYPE 0001
25 DDO Code (Cost Centre) PR7151
26 DDO Code (Fund Centre) PR7151 P-Rool no:2
27 District (Sub area) Peshawar
28 Contract Government
29 Position Checked Non Checked
30 Designation Mali
31 Ministry (Organisational Unit) Education
32 Fund Section
33 Payroll Section
34 Buckle no (if any)

Signature of Principal

PRESENT ADDRESS INFO TYPE 0006

35 C/O  
MUKHAMMAD-NILAMZAD

36 House no/Street  
AL-E-MADINA-STRIT-8-11-DALIAZATA  
R.O.D-PAISHAWAR-XYOLIK-2-E-MADINA

37 Postal Code

38 City  
PAISHAWAR

39 District

40 Province / Region  
KPK Peshwar

41 Contract No.  
030204911391

42 Company Housing  
 Yes  No

PERMANENT ADDRESS - INFO TYPE 0006

Permanent address

Permanent address is same as above

Permanent address is different from present address

43 C/O  
MUKHAMMAD-NILAMZAD

44 House no/Street  
VILLAGE-MANGER-KHEL-PO  
DAGER-MARI-THE-BANDA-DALIAZATA  
SAMAH-DISTRICT-MARRAKH

45 Postal Code

46 City  
MARRAKH

47 District

48 Province  
KPK

49 Contract No.  
030204911391

50 Company Housing  
 Yes  No

BASIC PAY - INFO TYPE 0008

51 Pay Scale type

52 BPS Year (Pay Scale Area)  
01 Mali

53 Grade (Pay Scale Group)  
01 Mali

54 Pay Scale Level  
01 Mali

55 Pays

Wage type	Description	Amount
001	Pay	6000
1001	HA	1337
1310	CA	1200
1320	Medical	1000
1948	Ad-10	1800
1970	Ad-11	878
2118	Ad-12	1178
2148	Ad-13	900

Wage type	Description	Amount
3001	GPF	373
3501	B/E	120
3601	Gins	58
3990	E.G.F	50

56 LEAVES - INFO TYPE 2001

Code	Description	Balance

Code	Description	Balance

BANK DETAIL - INFO TYPE 0009

57 Bank Branch (Bank Key)

58 Postal Code  
0315

59 Bank Account No.

61 Payment method

0010026096080020

59 City  
Allied Bank Memara  
Mandi Peshwar

**GP FUND SUBSCRIPTION - INFO TYPE 0057**

62 Wage Type 3000

63 GPF Subscription Edu: 043976

**GP FUND - INFO TYPE 9202**

64 Interest Applied  
 Yes  No

65 GPF balance 2912

66 GPF Bal date (DD/MM/YYYY)

67 Old GP Fund Account Number Edu: 043976

**CREATE DATA SPECIFICATION - INFO TYPE**

68 Date appointed as Gazetted Officer (DD/MM/YYYY)

69 Suspension Date

70 Expiry of Adhoc/Contract Date

*Without Pay* 1-1-2002 to 05-5-2013

**INTERNAL DATA - INFO TYPE 0032**

71 Previous Personnel Number (if any)

72 National Tax Number (NTN)

73 Leave without pay

74 Cash Center

**75 FAMILY INFORMATION - INFO TYPE 0021**

S.No.	Relation	Last name	First Name	Nominee	Gender	DOB	City of birth	Nationality	%age of share	Emp Type	Other Nationality
1	wife	BAHAR	NOOR	100%	F	1978	Karak Pakistan	17301-6473233			
2											
3											
4											
5											
6											
7											
8											
9											
10											

**76 RECURRING PAYMENTS (ALLOWANCES) - INFO TYPE 0014**

Wage Type	Description	Amount

Wage Type	Description	Amount

**77 RECURRING PAYMENTS (DEDUCTIONS) - INFO TYPE 0014**

Wage Type	Description	Amount

Wage Type	Description	Amount

**PAYROLL STATUS - INFO TYPE 003**

78 SALARY STATUS  Stop Payment  Stop Payment

PRINCIPAL  
 Govt. Girls' High School  
 School Land

**EDUCATION AND QUALIFICATIONS**  
**ACADEMIC EDUCATION**

(Code)	Type of Institute	(Code)	Description	Education	Date Obtained	Marks (if any)
1	MATRIC			Matric	(1991)	434 434
2						
3						
4						

**PROFESSIONAL QUALIFICATION**

(Code)	Description of Professional Qualification	Date Obtained	Proficiency
1	NIL		
2			
3			
4			

**Instructions:**

Code of Type of Institute can be found in the 'Book of Codes' together with description.  
 Code of Description of Education can be found in the 'Book of Codes' together with description.  
 Code of Description of Professional Qualification can be found in the 'Book of codes' together with description.  
 Date Obtained: Date on which this education/qualification was obtained. Use this format DD/MM/YYYY  
 For example 10 September 1990 will be written as 10/09/1990  
 \*Type of Institute: For example High School, Business school etc\*  
 Description of Education: The description of the education obtained. For example  
 B.A., B.Com, B.Sc.  
 Marks (if any): Marks obtained e.g. 80%, 60% etc\*  
 Description of Professional Qualification: For example CA, ACMA, LLB, MBBS etc\*  
 Proficiency: How to rate your professional expertise. For example High, Poor, Excellent etc\*

**FORM: PAY01 INSTRUCTIONS**

**General Instructions**

- A This form is to be used at the time of hiring of a new employee.
- B This form can also be used at the time of hiring a GP Fund only employee.
- C Dates are to be included in the following format: DD/MM/YYYY  
For example: To include 1 January 2002 use 01/01/2002
- D For List of Codes please refer to List of Codes Booklet provided to support these Input Forms
- E As a general rule when the following is seen:

The boxes imply that there is a code that goes into the field. The Description will follow on the line provided. For Example:

Central Government.

[H/W] NWFP

CODE - DESCRIPTION

**Specific instructions**

- 1 Add the office name: e.g. AG NWFP
- 2 Add the month to which this adjustment relates. E.g. October
- 3 Refer to List #1 from the Lists of Codes booklet
- 4 Enter the Description of the DDO Code.
- 5 Enter Date when this information is entered into the Computer.
- 6 Refer to List # 15 from the Lists of Codes booklet
- 7 Refer to List #20 from the Lists of Codes booklet.
- 8 Refer to List # 13 from the Lists of Codes booklet
- 9 Self Explanatory
- 10 Date of Birth
- 11 Self Explanatory
- 12 Reason for Action Choose 01 for Fresh Appointment, Choose 02 for Transfer in from Non Computer Office.
- 13 Self Explanatory
- 14 Enter your last name:  
e.g. Name in Mr. Javed Saleem Arif  
Last Name will be: Saleem Arif
- 15 Enter your first name:  
Using the above example  
First name will be Javed
- 16 Full Father or Husband's Name
- 17 Self Explanatory e.g. Hyderabad
- 18 Self Explanatory. Options can be Single, Married, Widlow, Divorced, Unknown
- 19 Self Explanatory e.g. Peshawar
- 20 If applicable when did an employee get married.
- 21 Self Explanatory e.g. Sinth
- 22 Self Explanatory
- 23 Self Explanatory e.g. Pakistan
- 24 Self Explanatory e.g. Islam
- 25 refer to List # 3 from the Lists of Codes booklet
- 26 Refer to List #3 from the Lists of codes booklet
- 27 Enter District (Sub Area) here. E.g. For Abbottabad add AD
- 28 Tick the appropriate Contract with a government.
- 29 Self Explanatory
- 30 Refer to List #5 from the Lists of Codes booklet
- 31 Refer to List # 9 from the Lists of Codes booklet
- 32 Refer to List #8 from the Lists of Codes booklet
- 33 Refer to List # 8 from the Lists of Codes booklet
- 34 In case of Police add Buckle Number here.
- 35 Self Explanatory
- 36 Self Explanatory
- 37 Self Explanatory
- 38 Self Explanatory
- 39 Self Explanatory
- 40 Self Explanatory
- 41 Add Phone Number here
- 42 Self Explanatory
- 43 Self Explanatory
- 44 Self Explanatory
- 45 Self Explanatory
- 46 Self Explanatory
- 47 Self Explanatory
- 48 Self Explanatory
- 49 Add Phone Number here
- 50 Self Explanatory
- 51 Refer to List # 13 from the Lists of Codes booklet
- 52 Refer to List # 13 from the Lists of Codes booklet
- 53 Refer to List # 13 from the Lists of Codes booklet
- 54 Refer to List # 13 from the Lists of Codes booklet
- 55 Wage Type: Refer to List # 10 from the Lists of Codes booklet Add Description using the list. And Enter the Amount in Rupees.
- 56 Refer to List # 28 from the list enclosed with these instructions.
- 57 Refer to List # 2 from the Lists of Codes booklet
- 58 Self Explanatory
- 59 Self Explanatory.
- 60 Enter Employee Bank Account Number here.
- 61 Refer to List # 11 from the Lists of Codes booklet
- 62 Refer to List # 26 from the Lists of Codes booklet. Only enter code in the Range of 300031000
- 63 This is an Amount Column
- 64 Self Explanatory
- 65 This is an Amount Column
- 66 Date on which this balance exists.
- 67 Old GP Fund Account Number is a 11 digit GP Fund Number.
- 68 Self Explanatory
- 69 Self Explanatory
- 70 Self Explanatory
- 71 Self Explanatory
- 72 Self Explanatory
- 73 Self Explanatory
- 74 Self Explanatory
- 75 Enter Nominee/Family into there: For Emp Type refer to List # 22 from the Lists of Codes booklet.
- 76 Wage Type: Refer to List # 25 from the Lists of Codes booklet. Add Description using the list. And Enter the Amount in Rupees.

  
**PRINCIPAL**  
 Govt. Girls Higher Secondary

DATE

PAY ROLL-02

DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

Name of Office

Sub Head

SECONDARY EDUCATION

1 Fund No. N C 2 1 C 1 6

2 Doucm No. [ ] [ ] [ ] [ ]

3 Counter No. [ ] [ ] [ ] [ ]

4 Govt. Code [ ] N [ ]

5 Business/Area/Debt: D G P R

6 Cost Center DDO Code P R 7 0 6 8

7 Detail Function No. 0 9 2 1 0 1

8 Venduer No. 3 0 0 0 4 2 3 0

9 C.I Code [ ] 0 [ ] 1

10 N. Code [ ] 0 [ ] 1

COL. ...

D.A. ...

Big ...

Date: 11/1/14

Detail Object	Additional Object	Amount	Detail Object	Additional Object	Amount
A 011057	0000	38791 ✓	406103	0000	840
A 01202	0000	9092 ✓	406214	0000	21
A 01217	0000	11569 ✓	406408	0000	406
A 0120X	0000	6806 ✓	406408	0000	350
A 0120A	0000	11943 ✓			
A 0120m	0000	3529 ✓			

CROSS PAYMENT  $\frac{81784}{94629} = 7758$  TOTAL DEDUCTION Rs.  $\frac{3101}{3}$

NET PAYMENT  $\frac{91538}{78678/480163} = 1617$

10/98783

% A.G. N.W.F.P. PESHAWAR

DOC NO. 604373 N.P.O.

11/1/14

01 01

T.No. Received by

C.O. A.O. P.P.O.

District Education Officer  
(Female) Peshawar  
D(EDUCATION) EDUCATION OFFICER  
(FEMALE) PESHAWAR

Name of Section and of incumbent	Name of posts	Pay and acting allowance claimed (separately) for Government	Leave salary claimed (separately) for absentees	Compensatory allowance	Pay, acting allowance or leave salary head over for	Net charges for each section	P. Fund	Other Funds and miscellaneous recoveries	Income-Tax	Net amount payable	Remarks	Acquittance
	B/R							91532				
<p>Deduct— Un-disbursed pay refunded, as detailed below.</p> <p>Net sum required for payment (in words and figures).</p>												

(Rupees) Ninety one thousand five hundred and thirty eight only

\* In case of recoveries made under orders issued from an Accounts Officer, the number and date of the Accountant Generals letter should be quoted in the bill. The Government of Pakistan exercise in supervision over the managers Hindu Family Amity Fund, Bangal Christian Family Pension Fund and the General Family Pension Fund and are in no way responsible for their solvency.

- Received contents also certified that I have satisfied myself that all emoluments included in bills drawn 1month/2month previous to this date with the exception of those detailed below (of which the total has been refunded by deduction from this bills have been disbursed to the proper persons and that their receipts have been taken in Acquittance Rolls filled in my Office, with receipt stamp duly cancelled for every payment in excess of Rs. 20. One line to be used and the other to be scored out.
- Certified that a person in superior service has been absent either on deputation or suspension or without leave (except casual leave) during the month.
- Certified that all Officers whose names are omitted from but whose my has been drawn in this bill, have actually been entertained during the month.
- Certified that no leave has been granted until by reference to applicant's service books and leave accounts to the leave rules applicable to him. I had satisfied myself that it was admissible and that all grants of leave departure on and returns from leave and all periods of suspension and deputation and other event which are required under the Rules to be so have been recorded in the Service Books and Leave Accounts under my initials.
- Certified that all appointment and permanent promotions and such of the acting promotions as have to be entered in the service books as per columns in the Standard Form No. F.R. to have been entered in the service books of the persons concerned under my initials.

Station.....  
Dated.....

Signature and Designation of Head of Office.

DETAILED PAY OF ABSENTS REFUNDED

Section of Establishment	Name	Period	Amount	Section of Establishment	Name	Period	Amount	Pay: Rupees ( ).....
								Examined and entered Treasury Accountant Date 200



Pay Bill of Permanent Establishment of the

for the month of.....

DISTRICT.....		Head of Service Chargeable:-										Pay Rupees ( ).....		Voucher No.	
Admitted Rs.														List of Payment for.....	
Objected Rs.														20	
Auditor.		Senior Accountant										Auditor		G.O.	
Name of Section and of incumbent	Name of post	Pay and acting allowance claimed (separately) for Government servants present/absentees	Leave salary claimed (separately) for present/absentees	Compensatory allowance	Pay acting allowances or leave salary head	Items	Net charge for each section	P. Fund	Other Funds and miscellaneous recoveries.	Income-Tax	Remarks	Accd.			
Mohd Navazul Malik	SM	4781	1121 1426	839 1472	441 956		11036	212	120 3 58 50	443	10593				
		5700x5	1336x5 1700x5	1000x5 1755x5	520x5 1140x5	855x5	14012x5	212x5	120x5 3x5 58x5 50x5	443x5	13569x5				
		28300	6680 8500	5000 3775	2630 5200	4225	7000	1060	100 15 240 250	2215	67345				
		5560	1291 1643	967 1696	508 1102	826	13543	212	120 3 58 50	443	13100				
		29464													
		32791	9092 11569	6806 11943	3529 (7758)	5101	94639	1484	840 21 406 350 3101	8063	91138				

District Education Officer (Female) Peshawar (Cashier)

The total of each Section should be entered in red ink. In case of recoveries made under orders issued from an Account Officer, the number and date of Accountant Generals letter should be quoted in the bill. The Government of Pakistan supervision over the management of the Hindu Family Annuity Fund Bengal Christen Family Pension Fund and the General Family Pension Fund and are in no way responsible for the to be entered by Drawing Office and checked in Audit Office.



DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER/

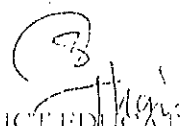
Mr. Mohammad Naveed Mali GGHS-Lady Griffith Peshawar is hereby adjusted only for the purpose of pay for the period 06/05/2013 to 29/11/2013 at GGMS Haryana Bala Peshawar against vacant post of Naib Qasid.


(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

Endst: No. 5426-29 /P.F. Naveed, Mali dated 12/11/2013.

Copy of the above is forwarded to the :-

1. Accountant General Khyber Pakhtun Khwa Peshawar.
2. Director E & S Education Khyber Pakhtun Khwa Peshawar.
3. Principal/Head Mistress concerned.
4. Official concerned.
5. B & A O local office

  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

  
PRINCIPAL  
Govt. Girls Higher Secondary  
School Ladygriffith  
Peshawar

(TO BE SUBSTITUTED BY EVEN NO. AND DATE)  
OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

ADJUSTMENT

Consequent upon the recommendation of the enquiry officer conveyed by the Director Elementary & Secondary Education Khyber Pakhtun Khwa vide letter No.663/A-20/C-IV/Peshawar/KC dated 07/11/2013, Mr. Muhammad Naveed S/O Muhammad Sharif Ex-Laboratory Attendant GGHSS Lady Griffith Peshawar is hereby adjusted against vacant post of Mali at GGHSS Lady Griffith Peshawar with immediate effect with out any back benefit.

His absence period w.e.f. 26/05/2004 to 05/05/2013 is hereby converted into leave with out pay.

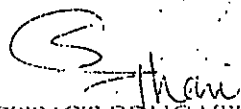
- Note:-
1. Necessary entry to this effect should be made in her service book.
  2. He will not apply for any kind of leave for the next five years.


(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

Encl: No. 5026-30 P.F. M. Naveed L/Attd: dated 29/11 /2013.

Copy of the above is forwarded to the :-

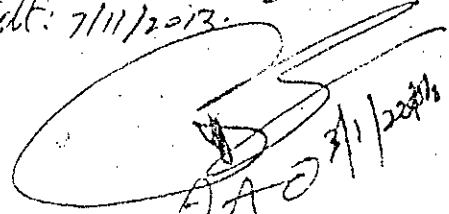
1. Accountant General Khyber Pakhtun Khwa Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtun Khwa vide letter No.663/A-20/C-IV/Peshawar/KC dated 07/11/2013
3. Principal/Head Mistress concerned along with service book.
4. Official concerned.
5. Cashier local office.

  
DISTRICT EDUCATION OFFICER  
(F) E & S EDU: PESHAWAR

  
PRINCIPAL  
Govt. Girls Higher Secondary  
School L. Griffith  
Peshawar

ITP  
F-Paper

- ① S/Bank may pl be completed from Deptt.
- ② pay may also be fixed from pay fraction party.
- ③ Leave order attested, copy also be provided
- ④ Directorate order may pl be processed  
vide letter no: 663/A-2010-11/Postman/LL dt: 7/11/2013.

  
AAO 3/11/2014  
SA  
3/11/2014

**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 218/2015

Muhammad Naveed

VS

Education Deptt:

.....

**REJOINDER ON BEHALF OF APPELLANT**

.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-10) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Admitted correct by the respondents as the service record is in the custody of the respondents department.
- 2 First portion of para 2 is admitted correct. Hence no comments while the rest of the para is incorrect, hence denied.
- 3 Not replied according to para 3 of the appeal. Moreover para 3 of the appeal is correct. Furthermore there are many posts of Lab: Attendant which are vacant or newly created post of Lab: Attendant in different schools but despite that the appellant was not adjusted on any of these post. (Copies of vacant posts or new created posts are attached as R-1)
- 4 Admitted correct by respondents hence no comments.

- 5 Admitted correct by respondents hence no comments.
- 6 Incorrect. The appellant is regularly performing his duty and according to section-17 of the Civil servant Act 1973 the pay of the post is the legal right of the appellant and no one can be forced labour which is violation of the Article-11 of Constitution of Pakistan.

**GROUNDS:**

- A. Incorrect. the appellant is regularly performing his duty and according to section-17 of the Civil servant Act 1973 the pay of the post is the legal right of the appellant and no one can be forced labour which is violation of the article-11 of Constitution of Pakistan.
- B. Incorrect. There are many posts of lab: Attendant which are vacant or newly created post of Lab: Attendant in different schools but despite that the appellant was not adjusted on any of these posts. (Copies of vacant posts or new created posts are attached as R-1)
- C. Incorrect the appellant has not been treated according to law and detail reply has been in the above paras.
- D. Not replied according to para D of the appeal. Moreover para D of the appeal is correct.
- E. Incorrect. While para E of the appeal is correct.
- F. Incorrect. The inquiry officer has recommended to adjust the appellant against his post.
- G. Legal.

It is, therefore, most humbly prayed that the appeal of appellant may kindly be accepted as prayed for.

*Muhammad*  
APPELLANT  
Muhammad Naveed

Through:

*M. Asif Yousafzai*  
(M. ASIF YOUSAFZAI)  
&  
*Taimur Ali Khan*  
(TAIMUR ALI KHAN)  
ADVOCATES, PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.



*Muhammad*  
DEPONENT

R-I

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

APPOINTMENT /

Consequent upon the approval of the Departmental Selection Committee in its meeting held on 21.11.2015, the competent authority is pleased to appoint Amb Habib S/O Gul Habib Lab Attendant GGHS Lady Griffith Peshawar BPS-01 (Rs. 4900-170-10000) plus usual allowances under deceased/Retired son/landowner/disabled as admissible under the rules against the vacant post with effect from the date of his/her taking over charge on the following terms and condition

TERMS & CONDITION.

1. He/She will be governed by such rules and regulations as may be prescribed by the Govt from time to time for the category of the Govt servant to which he/she belongs.
2. His/Her service will be liable to termination at any time/state without any notice.
3. In case of resignation one month's prior notice should be given by the official concerned otherwise one month pay will be forfeited in lieu thereof in the Govt Treasury.
4. His/Her service is on purely temporary basis and liable to termination/reversion at any state without assigning any notice/reason.
5. He/She will produce Health certificate from the Civil Surgeon concerned before taking over charge.
6. Charge report should be submitted to all concerned.
7. No TA/DA etc is allowed being in appointment.
8. NOTE: Their appointment order shall be verified by the concerned DDO personally from the office of the DEO(F)Peshawar before handing over charge to the official.

(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR  
Dated Peshawar the 21/11/2015. ✓

Endst No. 984-38 / F.No. App't C.IV/2015

Copy for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director of Elementary and Secondary Education KPK Peshawar.
3. Principal/Headmistress concerned.
4. Supdt Estab Local office.
5. Cashier Local Office.
6. Official concerned.

*(Signature)*  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR

*Need for comparison  
create a B/P in 4900 -  
In this order you have  
4900 please...*

*Principal used*  
PRINCIPAL  
Govt. Girls Higher  
Secondary School



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER.

Consequent upon of the Competent Authority Mst: Samina Lab: Attendent Govt;; Higher Secondary School Lady Griffith is hereby transferred/Adjusted at GGHS, Quaid Abad against the vacant post of Lab: Attendent on her own pay BPS in the interest of public service with immediate effect.

Note:-

1. No.TA/DA is allowed.
2. Charge repost should be submitted to all concerned.

(SAMINA GHANI)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR

Endst; No 560477

Dated Peshawar the 15/12/2014

Copy forwarded for information to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Principal GGHS, Lady Griffith Peshawar.
3. Headmistress, GGHS, Quaid AbAD.
4. Official concerned.

(S)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR

R-I



GOVT: OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

NO.BOX/F/D/2-4/2014-15/Peshawar  
Dated Peshawar: the 23/10 2014.

To

The Accountant General,  
Khyber Pakhtunkhwa, Peshawar..

Subject: - UP-GRADATION OF GOVT: GIRLS MIDDLE SCHOOL QAID ABAD  
KAKSHALTO HIGH STATUS IN DISTRICT PESHAWAR.

Audit copy duly authenticated in respect of above subject scheme is sent  
herewith for further necessary action.

Encl: As Above.

BUDGET OFFICER-X.

Endst: No. & date as above.

Office copy of the Audit copy authenticated by this department in respect of  
the above mentioned scheme is forwarded to the Section Officer (B&A), Elementary &  
Secondary Education Department with reference to his letter No SO(B&A)4-  
29/09/Peshawar, dated 20-10-2014 for further necessary action.

BUDGET OFFICER-X.

انٹرنیٹ

GGHS Qaid Abad Peshawar

PR-7292



**GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Sanction**

*Dated Peshawar the, 20.10.2014*

**No. SO (B&A)/4-29/09/Peshawar-** Sanction of the Government of Khyber Pakhtunkhwa, is hereby accorded to the creation of the following posts and incurrence of the expenditure to the extent in connection with the scheme Up-gradation of GGMS Quaid Abad Kakshal to High level in District Peshawar as developmental scheme on temporary basis w.e.f, 01.10.2014 at a total cost of Rs. 1,582,600/- as per details given below, subject to observance of all codal formalities.

Details of Posts	No. of Posts
Head Mistrees BPS-17	01
SET (BPS-16) (02 Science & 01 Arts)	03
Qaria (B-12)	01
Junior Clerk (B-11)	01
Chowkidar (B-1)	01
Lab: Attendant (B-1)	01
<b>Total Posts</b>	<b>08</b>
Λ011-1 Pay of Officers	414,000
Λ011-2 Pay of other staff	201,600
Λ01202-House Rent allowance	112,500
Λ01203-Con: Allowance	252,000
Λ01207-Washing Allowance	1800
Λ01208-Dress Allowance	1800
Λ01217-Medical Allowance	76,500
Λ0120X-Adhoc Allowance 2010	188,100
Λ0121A-Adhoc Allowance 2011	57,600
Λ0121M-Adhoc Allowance 2012	122,400
Λ0120T-Adhoc Allowance 2013	92,700
Λ0120-Adhoc Allowance 2014	61,600
<b>Total:-</b>	<b>1,582,600</b>

2. The expenditure involved is debitable to the Functional-cum-object classification 09-Education Affairs and Services 092-Secondary Education Affairs and Services 0921-Secondary Education Affairs and Services 092101-Secondary Education and shall be met out from within the sanction budget Grant 2014-15, through the following Re-appropriation out of the Lump sum provision made in the Budget Estimates 2014-15.

1	2	3	4	5	6	7	8	9
Sender fund	Function	Sender cost centre	Object Head	Function	Receiver Fund	Receiver Cost Centre	Object Head	Amount
NC21073	092101 Secondary Education	PR-7234 Provincial Program (Secondary)	A03970-37 Others, L.S Provision at the disposal of FD	092101 Secondary Education	NC21073	PR-7292 GGHS Quaid Abad Kakshal Peshawar	Details is above	1,582,600

**SECRETARY TO GOVT: OF KHYBER PUKHTUNKHWA  
ELEMENTARY & SECY: EDU: DEPT:**

Endst. No. BO-X/FD/2-4/2014-15/ Peshawar.

Dated Pesh: the 23/10/2014.

Copy of the above is forwarded to District Accounts Officer Peshawar.

**BUDGET OFFICER-X  
PTO.**



GOVT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

No.B0-X/FD/2-4/2014-15/Peshawar  
Dated Peshawar the 12/12/2014.

To

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

Subject: - UP-GRADATION OF GOVT: GIRLS MIDDLE SCHOOL MOHMAND ABAD  
TO HIGH LEAVEL IN DISTRICT PESHAWAR.

Dear Sir,

I am directed to refer to your Department letter No. SO(B&A)-  
29/09/Peshawar, dated 18-11-2014 on the subject noted above and to state that Finance  
Department agrees to the upgradation of Govt: Girls Middle School Mohmarid abad to  
High status in Disitric Peshawar as developmental scheme, with effect from  
01/12/2014 at a Total Cost of Rs. 1,231,300/-. As per details given below, subject to the  
observance of all codal formalities.

Detail of Posts	No.of Posts
H/M (B-17)	01
SET(B-16)1-Arts,2-Science	03
Qari/Qaria(B-12)	01
Junior Clerk(B-11)	01
Chowkidar(B-01)	01
Lab Attendant(B-01)	01
<b>Total</b>	<b>08</b>
A011-1 Pay of Officers	322,000
A011-2 Pay of other staff	156,800
A01202-House Rent All:	87,500
A01203-Conv.Allowance	196,000
A01207-Washing Allowance	1,575
A01208-Dress Allowance	1,575
A0120X-Adhoc Allw 2010	146,300
A01217-Medical Allowce:	59,500
A0121A-Adhoc Allw: 2011	44,800
A0121M-Adhoc Allw: 2012	95,200
A0120T- Adhoc Allw: 2013	72,100
A0120 -Adhoc Allow: 2014	47,950
<b>Total</b>	<b>1,231,300</b>

2. The Expenditure involved is debitable to the Functional-cum-Object  
classification 09-Education Affairs & Services,092-Secondary Education Affairs &  
Services,0921-Secondary Education Affairs & Services,092101-Secondary Education:  
and shall be met out from within the sanctioned Budget Grant 2014-15 through the

following re-appropriation out of the lump sum provision made in the Budget Estimates 2014-15.

1	2	3	4	5	6	7	8	9
Sender fund	Function	Sender Cost Centre	Object Head	Function	Receiver Fund	Receiver Cost Centre	Object Head	Amount
NC21073	092101 Secondary Education	PR-7234 Provincial Programm (Secondary)	A03970-37 others, L.S provision at the disposal of F D	092101-Secondary Education	NC21073	PR-7294 GGHS Peshawar	Details is above	1,231

3. Audit Copy may please be prepared and send to this Department for authentication.

Yours faithfully,

Budget Officer-X.

ENDST; NO. & DATE AS ABOVE.

Copy forwarded to :-

1. The Director, Elementary & Secondary Education, KPK Peshawar.
2. The District Education Officer (Female), Elementary & Secondary Education Peshawar
3. The Deputy Director FMIU, Finance Department.
4. The Budget Officer-V, Finance Department, Peshawar.
5. Master File.

Budget Officer-X.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

RETIREMENT NOTIFICATION

Under the provision of Rules 20 of Khyber Pakhtunkhwa Govt. Servant revised leave rules, 1981 Sanction is hereby accorded for the encashment in lieu of LPR for the period of 365 days on full in favour of Mst. Zeenat Begum Lab-Att. Govt. Comprehensive Girls Higher Secondary School, Peshawar.

He is also allowed to retire from Govt. Service with effect from 01-07-2016 (P/N) in the age of superannuation.

Note:-

1. Necessary entry to this effect should be made in her S/Book.
2. His date of birth is 1956.

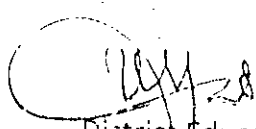
(ULFAT BEGUM)  
District Education Officer,  
(Female) Peshawar.

Endst. No. 4705-7

Dated. 22/7 16

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

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Principal Govt. Comprehensive Girls Higher Secondary School Peshawar along with original S/Book.
3. Official concerned.

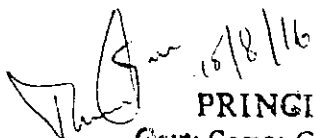
  
District Education Officer,  
(Female) Peshawar

OFFICE OF THE PRINCIPAL GGHSS COMPREHENSIVE  
PESHAWAR

CERTIFICATE

It is certified that Lab Attendant post is lying vacant in this school due to retirement of Ms. Zeenat Begum with effect from 01.07.2016.

Dated 10.08.2016

 10/8/16  
**PRINCIPAL**  
Govt: Comp: Girls Higher  
Principal Secondary School, Peshawar  
GGHSS Comprehensive  
Peshawar

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1369 /ST

Dated 23 / 8 / 2016

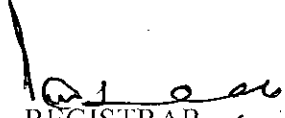
To

The DEO (Female),  
Peshawar.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 12.8.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.