

97/16

13.7.2016

None present for the appellant. Mr. Gul Muhammad, C.T alongwith Mian Amir Qadir, G.P for the respondents present. Representative of the respondents has produced copy of order dated 18.04.2016 according to which the appellant has been posted at GPS No. 1Skha Kot. Since none is in attendance on behalf of the appellant despite repeated calls as such the appeal is dismissed in default. File be consigned to the record room

ANNOUNCED  
13.7.2016

  
Chairman  
Camp Court, Swat

13.07.16

11.02.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as PST in the year 1994 and during the course of service promoted as SPST and then as CT to BPS-15. That the appellant is entitled to fixation of pay in SPST at the first stage and there-after as CT (BPS-15) but the respondents are reluctant to fix the same in terms entitlement of appellant constraining him to prefer departmental appeal on 27.11.2015 which was not responded and hence the instant service appeal on 26.1.2016.

Appellant Deposited  
Security & Process Fee

That the appellant is entitled to pay fixation in order of promotion. Places reliance on Article 38 (e) of the Constitution of the Islamic Republic of Pakistan.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 27.4.2016 before S.B.

  
Chairman

27.4.2016

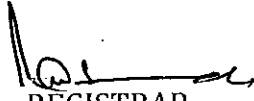

Agent of counsel for the appellant and Mr. Gul Muhammad, C.T alongwith Addl: A.G for respondents present. The appeal pertains to territorial limits of Malakand Division. To come up for written reply/comments on 13.07.2016 before S.B at camp court, Swat.

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 97 /2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.01.2016	<p>The appeal of Mr. Alam Khan resubmitted today by Mr. Noor Muhammad Khattak 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	28-1-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>11-2-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Alam Khan C.T GHS No.1 Sakhakot Distt. Malakand received to-day i.e. on 20.01.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Copy of notification dated 9.2.2013 mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it. *it*
- ② Copy of impugned order and departmental appeal against may be placed on file.
- 3- Annexure-D of the appeal may be attested.

No. 106 /S.T,

Dt. 20 / 1 /2016

*W. A. Khan*  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

*Note:*

*Sir,*

*copies of the notification dated 9.2.2013 and impugned order are not available, hence the appeal may be put up before the bench. That departmental appeal has already been attached as annexure "D" page-14.*

*W. A. Khan*  
*26/1/2016*

**BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO 97 /2016

**ALAM KHAN**

**VS**

**EDUCATION DEPTT:**

**INDEX**

<b>S.NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Memo of appeal	.....	1- 3.
2.	Service book	<b>A</b>	4- 11.
3.	Promotion Notification	<b>B</b>	13.
4.	Pay slip	<b>C</b>	14.
5.	Departmental appeal	<b>D</b>	15.
6.	Letter	<b>E</b>	16.
7.	Vakalat nama	.....	17.

**APPELLANT**

**THROUGH:**

  
**NOOR MUHAMMAD KHATTAK**  
**ADVOCATE**

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

APPEAL NO. 97 /2016

K.W.P. Province  
Service Tribunal  
Diary No. 58  
dated 20-1-2016

Mr. Alam Khan, C.T (BPS-15),  
GHS No.1 Sakhakot, District Malakand.

.....APPELLANT

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (Male), District Malakand.
- 4- The District Account Officer, District Malakand.

.....RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR FIXATION OF PAY FROM BPS-14 TO BPS-15 INSTEAD OF FROM BPS-12 TO BPS-15 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the respondents may kindly be directed to fix the pay of the appellant from BPS-14 to BPS-15 instead of from BPS-12 to BPS-15. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- Filed on day  
20/1/16*
- 1- That appellant joined the respondent Department as P.S.T (BPS-9) now BPS-12 vide Notification dated 27.10.1994. That appellant submitted his charge report and started performing her duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the service book is attached as annexure ..... **A.**

- no-submitted to-day  
and filed.  
20/1/16*
- 2- That vide Notification dated 9.2.2013 the appellant was promoted to the post of Senior Primary School Teacher (BPS-14) on seniority cum fitness basis and on the proper recommendation of Departmental promotion committee. That in response the appellant submitted his charge report and started performing his duty with utmost satisfaction of

his superiors. **Copy of the service book is already attached as annexure ..... A.**

- 3- That later on the appellant was promoted to the post of Certified teacher (BPS-15) on the recommendation of departmental promotion committee vide Notification dated 27.7.2015. That astonishingly the respondent No.3 fixed the pay of the appellant from BPS-12 to BPS-15 instead of from BPS-14 to BPS-15. Copies of the promotion Notification and pay slip are attached as annexure ..... **B and C.**
- 4- That due to the above mentioned action of the respondents the appellant has receive great financial loss by decreasing his pay instead of increasing. That appellant feeling aggrieved filed Departmental appeal but no reply has been received so far. Copies of the Departmental appeal and letter are attached as annexure ..... **D and E.**
- 5- That appellant having no other remedy filed the instant appeal on the following grounds amongst the others.

**GROUND:**

- A- That the action of the respondents by not fixing the pay of the appellant in BPS-15 from BPS-14 is against the law, facts and norms of natural justice.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner while fixing the pay of the appellant in BPS-15 from BPS-12 instead of from BPS-14 to BPS-15.
- D- That no notice has been issued to the appellant before fixation of his pay from BPs-12 to BPS-15.
- E- That no chance of personal hearing/ defense has been given to the appellant and as such the respondents violated the principle of Audi Altrem Partum.
- F- That according to Article 38(e) of the Constitution of Pakistan 1973 the state is bound to reduce disparity in the income and earnings of individuals including persons in the various classes of the service of Pakistan but in this case the respondents totally violated Article 38(e) of the Constitution of Pakistan 1973.

- G- That under the law appellant is fully entitle for fixation of his pay from BPS-14 to that BPs-15 instead of from BPS-12 to BPS-15.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

DATED: 14.1.2016

**APPELLANT**



**ALAM KHAN**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK  
ADVOCATE**



(For use in Police Department only).

A-4

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. dated received back

Exam. Roll No. Marks. Div. Session  
 ① Jse 20433 572/850 W 31/1988. L.D.E.O (A) Sam Ranizal

② FA 58945 509/1122 Left thumb-impression.

(A) 1996 L.D.E.O (A) Sam Ranizal

Qualification Possessed  
 English under Roll No 73588 Date 26/5/97  
 Pashtu 265 marks 2nd Division  
 Result declared on 3/6/97  
 Sub: Divl. Edu. Officer (M) Sam Ranizal Dargai (Malakand Agency)

Qualifications  
 Passed Pre Exam: Under Date - 1355  
 First Arts 628 marks 2nd Division Session 1993  
 Result declared on 25/10/93  
 B. L. or B. A. L.D.E.O (A) Sam Ranizal

Plan-drawing

Pleadership examination  
 Training School Final examination  
 Examination from M.O. F-6289587

Finger print  
 Passed M.A (Del) Exam from University of Peshawar  
 Drill instructing under Roll No. 21413 obtaining 585 marks out of 1100 in 2nd Division.  
 Court duties  
 Reserve duties  
 Result declared on 26-6-2000.

Other qualifications  
 Secured 558 marks under Division.  
 Result declared on 30/4/98  
 Sub: Divl. Edu. Officer (M) Sam Ranizal Dargai (Malakand Agency)

U-4  
 Dy. District Officer  
 (E&S) Education (M)  
 Sam Ranizal at Dargai M.O.

ATTESTED

N. B.—Line to be drawn under the qualification possessed.

243264  
3

(5)

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name *ALam Khan*

2. Race *Afghan*

3. Residence *Alas Kalli P/o Ghawar Kalli*

4. Father's name and residence *Hakim Khan village Alas Kalli*

5. Date of birth by Christian era as nearly as can be ascertained

*10-3-72 Tenth march N/Hand <sup>two</sup> series*

6. Exact height by measurement

*5-8*

7. Personal marks for identification

*Scar of wound on his forehead.*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.



Ring Finger



Middle Finger.



Fore Finger



Thumb.

ATTESTED

9. Signature of Government servant.

*Alam Khan*

*[Signature]*

10. Signature and designation of the Head of the Office, or other Attesting Officer.

*[Signature]*  
D. E. O (A)  
[Designation]

55  
Jan 1993

87

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Sign design of other officer of col
Sh. Latifullah (M.S. Agency)	Off. / Temp.	(B/S No. 9)	Rs. 1605/-			27/11/94	<i>[Signature]</i>	
Sh. Latifullah (M.S. Agency)	do		do			1/11/94	<i>[Signature]</i>	
do	do		Rs. 1605/-			1/12/94	<i>[Signature]</i>	
do	do		Rs. 1702/-			1/12/95	<i>[Signature]</i>	
Sh. Prabh Datta	do		Rs. 1799/-			1/12/96	<i>[Signature]</i>	
do	do		Rs. 1896/-			1/12/97	<i>[Signature]</i>	
do	do		Rs. 1993/-			1/12/98	<i>[Signature]</i>	
do	do		Rs. 2090/-			1/12/98	<i>[Signature]</i>	
Reversed		Rs. 1799/-						
1)	Pay on	2/6/97	Rs. 1799/-					
2)	Pay on	3/6/97	Rs. 2090/-					
			Rs. 1896/-					
3)	Pay on	1/12/97	Rs. 1993/-					
			Rs. 1993/-					
4)	Pay on	29/4/98	Rs. 2284/-					
5)	Pay on	30/4/98	Rs. 2381/-					
6)	Pay on	1/12/98	Rs. 2478/-					
7)	Pay on	1/12/99						

Sub Divisional Officer (M.S. Agency) S. Ranjan Dasgupta (Dargai)

Additional Officer (M.S. Agency) *[Signature]*

C.T. *[Signature]*

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishments or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
<i>[Signature]</i> S.D.E.O (M) Sam Ranizai	31/10/94	Tragedy	<i>[Signature]</i> S.D.E.O (M) Sam Ranizai			Appointed against Pre. Vice Post. vide order of the Govt (M) at Bakhala. S.D.M. No. 8253-594 dated 27/10/94. F.No. O/A-1/14/14/94.	
<i>[Signature]</i> S.D.E.O (M) Sam Ranizai	30/11/94	A/Inc. not admissible	<i>[Signature]</i> S.D.E.O (M) Sam Ranizai				
<i>[Signature]</i> S.D.E.O (M) Sam Ranizai	30/11/95	A/Inc.	<i>[Signature]</i> S.D.E.O (M) Sam Ranizai				
<i>[Signature]</i> S.D.E.O (M) Sam Ranizai	30/11/96	Transfer	<i>[Signature]</i> S.D.E.O (M) Sam Ranizai			Service W.e.f. 27/10/94 to 31/12/94 Verified from the deq Roll Office records	
<i>[Signature]</i> S.D.E.O (M) Sam Ranizai	30/11/97	A/Inc.	<i>[Signature]</i> S.D.E.O (M) Sam Ranizai			S.D.E.O (M) Sam Ranizai	
<i>[Signature]</i> S.D.E.O (M) Sam Ranizai	30/11/98	A/Inc.	<i>[Signature]</i> S.D.E.O (M) Sam Ranizai			Service W.e.f. 1/95 to 31/11/95 Verified from the deq Roll Office records	
<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai	Entire Review		<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai			S.D.E.O (M) Sam Ranizai	
<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai	30/11/98 and one more	Adm. Inc. on BA W.F.	<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai			Service W.e.f. 1/95 to 30/11/98 Verified from the deq Roll Office records	
<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai	30/11/99	Adm. Inc. on BA W.F.	<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai			S.D.E.O (M) Sam Ranizai	
<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai	30/11/99	Adm. Inc. on BA W.F.	<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai			Service W.e.f. 1/98 to 30/11/98 Verified from the deq Roll Office records	
<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai			<i>[Signature]</i> S.D.E.O (M) S. Ranazai Dargai			S.D.E.O (M) Sam Ranizai	

ATTESTED

on ac 9 3 mcs on BA home  
amt of 223/99 @ 30/- Rs 8018/86

(2478-7990)

*[Signature]*

C.T.  
*[Signature]*  
S. Ranazai Dargai

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
B/S No 9 (1605-97-3060)							
PIC CPS Arabanda off/Temp STRM			Rs 2575/-			1 <sup>12</sup> / <sub>2008</sub>	Alak
do	do		Rs 2672/-			1 <sup>12</sup> / <sub>07</sub>	Alak
Revised B/S No. 9 @ 2410-145-6760							
do	do		Rs 4005/-			1 <sup>12</sup> / <sub>01</sub>	Alak
do	do		Rs 4150/-			1 <sup>12</sup> / <sub>02</sub>	Alak
do	do		Rs 4295/-			1 <sup>12</sup> / <sub>03</sub>	Alak
<p>Adv. Lic. BAECT          State of the Accountant General          The Head of the Branch          No. 2410-145-6760          at B/S No. 9          1-12-2008          1-12-2009</p> <p>Associate Officer          The Accounts Dept. B/S No. 9</p>							
do	do		Rs. 4400/-			1 <sup>12</sup> / <sub>04</sub>	Alak
Revised B/S No. 9 (2770-165-7720)							
do	do		Rs. 5080/-			1 <sup>7</sup> / <sub>05</sub>	Alak
do	do		Rs. 5295/-			1 <sup>12</sup> / <sub>05</sub>	Alak

Sign design of other officer of col  
 DY  
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 DY  
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8	9	10	11	12	13		14	15
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/4/2000	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	Served W.e.f. 12/11/98 to 30/11/01. Verified from the reg Roll & other office records
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/11/01	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/11/01	Pay scale revised	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/11/02	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/11/03	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	Served W.e.f. 12/02 to 30/11/03. Verified from the reg Roll & other office records
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/4/04	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	Served W.e.f. 12/03 to 30/11/05. Verified from the reg Roll & other office records
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/6/05	Scale revised	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/11/05	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	
Alak	J. M. Shinde D.D.O. (M) Edu. Dargai	30/11/06	A/mov	J. M. Shinde D.D.O. (M) Edu. Dargai			J. M. Shinde D.D.O. (M) Edu. Dargai	

Office of The Accountant General  
 N.W.F.P. Peshawar  
 Pay Band: Rs. 165-7720 (9)  
 Pay Fixation: Rs. 3030/-  
 Party N.W.F.P. Peshawar  
**ATTESTED**

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
			BPS No. 9 Rs. (2770-165-7720)				
<sup>PST</sup> Gps Dawar Khan Kali	Off/Temp		Rs. 5410/-			1 <sup>12</sup> / <sub>06</sub>	Alak
			<del>Revised B-9 Rs. 3185-190-8885 w.e.f 1/7/07</del>				
			Rs. 6225/-			1/7/07	Alak
			Rs. 6415/-			1/12/07	
			<del>Revised Entry allowed B-12 Rs. 3630-260-11430/-</del>				
			Rs. 6495/-			1/12/07	
			<del>Revised B-12 Rs. 4355-310-13655/- w.e.f 1/07/08</del>				
			Rs. 7765/-			1/7/08	Alak
			4-4 unit Dy. Dist. Officer ( ) Gama Kantar Dargah				
			Rs. 8075/-			1/12/08	Alak
			Rs. 8385/-			1 <sup>12</sup> / <sub>09</sub>	Alak
			Rs. 8695/-			1 <sup>12</sup> / <sub>2010</sub>	Alak
			<del>Revised p/scale BPS-No-12 (7000-500-22000) w.e.f 1-7-2011</del>				
			Rs. 14000/-			1 <sup>7</sup> / <sub>2011</sub>	Alak

Signature  
of other  
officer  
of coln

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Edu

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1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
<del>PST</del> G.P.S. Dawa Khan Kalai	Off/Per		RS 14500/-			1/12/2011	<i>[Signature]</i>
			RS 15000/-			1/12/2012	<i>[Signature]</i>
Pay fixation in B.P.S No 14 RS 8000-610-26300/-							
Pay on 8/2/2013 in B.P.S No 14 RS 15000/-							
Pay fixed in B.P.S No 14 RS 15320/-							
One premature pay in B-14 RS 610/-							
Pay fixed in B-14 on 9 <sup>2</sup> / <sub>13</sub> RS 15930/-							
S.D.E.O. (M) Dargai MKD							
<del>SPST</del> G.P.S. Dawa Khan Kalai			RS 15930/-			9/2/13	<i>[Signature]</i>
			RS 16540/-			1/12/13	
Entries Revised							
B.P.S-12			Rs 6490/-			01/12/07	
plus premature			Rs 6750/-			1/12/07	
			Rs 8075/-			1/7/08	
			Rs 8385/-			2/12/08	

Signature of  
Government  
servant

By  
[Signature]

[Signature]

4.4.11  
S.D.E.O. (M)  
Dargai MKD

[Signature]

1/12/13

01/12/07

1/12/07

1/7/08

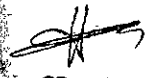


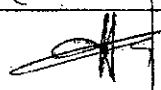

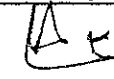


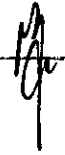
2/12/08





8	9	10	11	12	13		14	15	
					Leave				
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	
						Period	Government to which debitable		
Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer				Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
							<p>12/2010 to 30/11/2011</p> <p>Verified from the seq Roll &amp; other office records</p> <p>S.D.O (M) Dargai MKD</p>		
							<p>12/2011 to 30/11/2012</p> <p>Verified from the seq Roll &amp; other office records</p> <p>S.D.O (M) Dargai MKD</p>		
							<p>is here by undertake that if any overpayment on account of fixation in BPS- was paid to me, the same may be recovered from my pay / gratuity and pension accordingly</p> <p>Signature: _____</p> <p><i>Alam Khan Pst</i></p>		
							<p>is here by undertake that if any overpayment on account of fixation in BPS- was paid to me, the same may be recovered from my pay / gratuity and pension accordingly</p> <p>Signature: _____</p> <p><i>Alam Khan Pst</i></p>		
	<p><i>[Signature]</i></p> <p>S.DEO (M) Dargai MKD</p>	<p>30/11/14</p> <p><i>A/mc</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p> <p>S.DEO (M) Dargai MKD</p>			<p>Signature: _____</p> <p><i>Alam Khan Pst</i></p>		
		<p>File No 252 dt 2/11/15</p> <p>By 2 A/c... promotion... 30/5/14 to 31/12/14 Rs. 61307</p>			<p><i>[Signature]</i></p> <p>S.D.E.O. (M) Dargai MKD</p>		<p>is here by undertake that if any overpayment on account of fixation in BPS- was paid to me, the same may be recovered from my pay / gratuity and pension accordingly</p> <p>Signature: _____</p> <p><i>[Signature]</i></p>		
							<p>Promoted to B-14 Rs. 8500-610-26300/- vide Govt of KPK (EdSE) Deptt. No 50 (BQA) 1-18 EdSE 2012 dt. 11.7.12 DEO (M) MKD order Endost no 1167-1446 dt 2/2/13 &amp; corrigendum no 1556-1835 dt 16/2/13</p>		
							<p><b>ATTESTED</b></p> <p><i>[Signature]</i></p> <p>S.D.E.O. (M) Dargai MKD</p>		



8	9	10	11	12	13	14	15			
Signature of Government servant		Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government			
						Period	Government to which debit to			
		 SDEO (M) Dargal	6 2015	Scale Provision	 SDEO (M) Dargal MKD		12 11/12/2013 to 30/12/2013 Verified from the reg Roll & other office records B.E.O (M) Sargolha			
		 SDEO (M) Dargal MKD	27/7/2015	(A-N) promoted To CT (PB-15)	 SDEO (M) Dargal MKD		12 11/12/2014 to 30/11/2014 Verified from the reg Roll & other office records B.E.O (M) Sargolha			
		 SDEO (M) Dargal MKD	28/7/15	F	 SDEO (M) Dargal MKD		Service verified on 1-12-2014 to 27-7-2015 from reg. rolls & other office records.			
		 SDEO (M) Dargal MKD					Amounting to Rs. 4889/- for the period w.e.f 28/7/2015 to 31-7-2015 (04 days) received & deposited into Govt. Excessing Misc. Challer No. 03 dated 07/8/2015			
		 SDEO (M) Dargal MKD								
		<b>ATTESTED</b> 						of promoted to BPS-15 & post CT vide District Education Officer (M) Malakand at Betkela. No. 4637-76/Promotion SPS TT to CT Malakand Distt. Betkela: 27/7/15		

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MALAKAND  
AT BATKHELA**

B-12

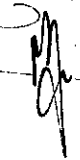
**OFFICE ORDER.**

Consequent upon the recommendation of Departmental Promotion committee in its meeting held on 25-7-2015, the District Education Officer (M)(E&SE) Malakand at Batkhela is pleased to approve the Promotion of the following SPST,s/PSHTs, on the basis of seniority cum fitness to the posts of CT (Male )regular BPS-15(10985-905-38135) are hereby adjusted against the CT vacant posts.

S #	Sen.No.	Name of official & Present Place of posting	School where posted as CT B-15
1	205	Sultan Muhammad PSHT.GPS Amandara	GCMHS Batkhela
2	254 ✓	Muhammad JehangirKhan PSHT.GPS.Pir Mahmood shah,Banda.	GHS No.2 Sakhakot
3	464	Muhammad Ilyas.SPSTGPS Pinjan	GHS No.1 Dheri Allahdand
4	472	Muhammad Ayaz SPST.GPS No.1 Thana	GHS No.1 Thana
5	478	Shah BadShah .SPST GPS.Jalalkot.	GCMHS Batkhela
6	486	Muhammad Riaz SPST.GPS Kot(H/C)	GHSS Kot
7	489 ✓	Gul Rahman SPST GPS Wartair	GHS Wartair
8	490	Muhammad Siyab SPST GPS Said Abad	GHS No.1 Dheri Allahdand
9	497	Gul Bad Shah SPST GPS Maina	GHS Maina
10	499	Muhammad Humayun Khan SPST GPS No.1 Kot	GHSS Kot
11	507	Muhammad Fayaz SPST GPS .Kot(H/C)	GHSS Kot
12	522 ✓	Ali Gohar SPST GPS.Janat Abad	GHS HaryanKot
13	523	Wazir Said SPST GPS Krapa	GHS HaryanKot
14	528	Hamidud Din SPST GPS Bazdara Payeen	GHS Palai
15	540	Muhammad Naeem SPST GPS Haibat Gram	GCMHS Batkhela
16	563	Sana Ullah Jan SPST GPS CC Thana	GCMHS Batkhela
17	569	Said Malik SPST GPS No.1 Jalala	GHS No.1Thana
18	572	Iftikhar Hussain SPST GPS Gulshan Abad	GHS No.1 Dheri Allahdand
19	578	Arshad Karim SPST GPS Palai Khpa	GHS CC Thana
20	580	Nazar Badshah SPST GPS Sori Ghara	GHS HaryanKot
21	581	Fazal Qahar SPST GPS Jalala	GMS Pianda Kandaro
22	583 ✓	Nek Bad shah SPST GPS Qadam Khela	GHS Wartair
23	609	Gul Muhammad SPST GPS Maizara	GHS No.2 Batkhela
24	611 ✓	Alam Khan SPST GPS.Dawa Khan Kally	GHS No.1 Sakhakot
25	613 ✓	Muhammad Tariq SPST GPS Koper	GHS Badraga
26	618 ✓	Jehangir Khan SPST GPS Garang Dara	GHS Wartair
27	619	Muhammad Shafiq SPST GPS Pinjan	GHS No.1 Dheri Allahdand
28	621	Zamir Khan SPST GPS Sori Ghara	GHS No.2 Batkhela.
29	622	Muhammad Idress SPST GPS Maina	GHS Brah
30	624	Obaidur Rahman SPST GPS shagai Amandara	GHS No.2 Batkhela
31	625	Muhammad Raees Khan SPST GPS Hisar kally	GHS Totakan
32	627	Syed Muhammad Musa SPST GPS Qulangi	GHS Totakan
33	640 ✓	Muhammad Zahir Shah SPST GPS Makhnawala	GHS Badraga
34	647	Umar Rahman SPST GPS Shagai Amandara	GHS NO.1 Dheri Allahdand
35	653	Shahid Hussain SPST GPS No.2 Thana	GCMHS Batkhela
36	656	Shah Mulk SPST GPS No.3 Batkhela	GHS Khar

**TERMS AND COMNDITIONS:**

1. They would be on probation period of one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their Services can be terminated at any time, in case of his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules Framed from time to time.

**ATTESTED**  


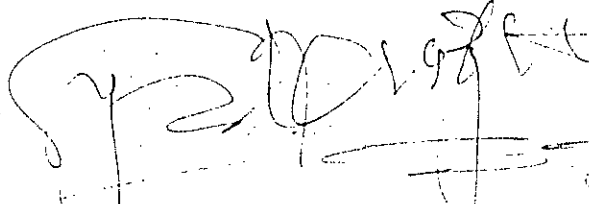
4. Charge report should be submitted to all concerned.
5. NO TA/DA is allowed for joining his duty.
6. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reverted.

(SYED MANZAR JAN SAJID)  
DISTRICT EDUCATION OFFICER  
(M) MALAKAND AT BATKHELA

Endst.No. 4637-76 / Promotion SPST to CT Malakand . Dated Batkhela the 27/7/2015.

Copy forwarded for information and necessary action to the:-

1. Director (E&SE)Khyber Pakhtunkhwa, Peshawar.
2. Principals/Head Masters GHSS/GHS/GMS in District Malakand.
3. District Accounts Officer Malakand.
- 4-5. SDEO.s(M)Swat & Sam Ranizai at Batkhela & Dargai.
6. B&AO of the local office.
7. AP DEMIS local office.
8. Teachers Concerned.

  
DISTRICT EDUCATION OFFICER (M)  
MALAKAND AT BATKHELA





GOVERNMENT OF PAKISTAN  
 ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA  
 DISTRICT  
 PAYROLL SYSTEM and

PAYMENT ADVICE

13

SU-748

P Ser: 002 Month: July 2015

Pers #: 00243764 Buckle:  
 Name: ALAM KHAN  
 DESIGNATION REBATE

HD7040 - Government Primary Scho  
 GOVERNMENT PRIMARY SCHOOL  
 ITN:  
 EPF #: EDUN0004275

Cell No: 11790139200

Old No: 1370139200

GPF Interest Applied

DEPTT CODE

14 - Active Temporary		HD7040	-04
<b>PAY AND ALLOWANCES:</b>			
0001-Basic Pay			22,980.00
1000-House Rent Allowance			1,476.00
1300-Medical Allowance			1,500.00
1911-Compen Allow 20% (1-15)			1,000.00
1948-Adhoc Allowance 2010@ 50%			4,347.00
2148-15% Adhoc Relief All-2013			2,572.00
2174-Adhoc Relief Allow-2014			1,715.00
2199-Adhoc Relief Allow @10%			2,298.00
<b>Gross Pay and Allowances</b>			<b>37,880.00</b>
<b>DEDUCTIONS:</b>			
ITA Payable	530.40	Deducted	110.00
GPF Balance	235,927.00		TAX: (3609) 54.00
3501-Benevolent Fund			Subtr. 1,372.00
3511-Addl Group Insurance			180.00
3604-Group Insurance			13.00
3990-Emp Edu. Fund KPK			115.00
			100.00
<b>Total Deductions</b>		<b>NET AMOUNT PAYABLE</b>	<b>1,834.00</b>
			<b>36,054.00</b>

QUALIFYING SERVICE  
 YRS MON  
 20 Years 09 Months 004 Days  
 D.O.B 10/03/1972

LFP Quota:  
 NATIONAL BANK OF PAKN. R. P. SAKHAKOT  
 PL 5000000003404-4

**ATTESTED**

*[Signature]*

D - (14)

بخدمت جناب DEO (M) صاحب ملاکنڈ ایٹ بٹ خیلہ

عنوان: اپیل

جناب عالی

مودبانہ گزارش ہے کہ مندرجہ ذیل اساتذہ کا SPST سے CT میں پروموشن  
27-07-2015 بمطابق آرڈر نمبر 4637-76 ڈی ای او ملاکنڈ ایٹ بٹ خیلہ کو ہو چکا ہے۔  
چونکہ مذکورہ اساتذہ کا سکیل 14 پر تین سال مکمل ہونے میں اب چند مہینے باقی  
ہیں اور متعلقہ حکام براہ راست سکیل 12 سے سکیل 15 میں فیکس کرنا چاہتے ہیں جس  
سے تنخواہ پہلے سے بھی کم ہو رہی ہے۔

لہذا اپ صاحبان مہربانی کر کے متاثرہ اساتذہ کا 09-02-2016 تک اپنی پرانی  
تنخواہ جاری کروانے اور 10-02-2016 کو پھر نئی سکیل 15 کے مطابق تنخواہ فیکس  
کرانے کے احکامات جاری فرمائیں۔

سائلین اپ کے اہل و عیال کے لئے تاحیات دعا گو رہینگے۔

العارضین

عالم خان سیریل نمبر 24

ATTESTED



E - 15

OFFICE OF THE  
District Education Officer (M)  
Malakand at Batkhela  
No. ~~7499~~ / Pay Protection/CT/Mkd;  
Dated Batkhela the 27 /11/2015.

To

The Director  
(E&SE)Khyber Pakhtunkhwa,  
Peshawar.

Subject: PAY PROTECTION TO CT TEACHERS.

Memo:

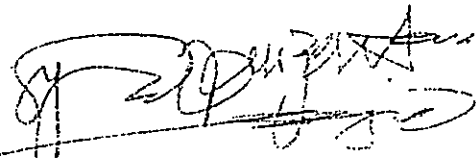
As per Promotion order of 34 teachers from SPST B-14 to CT BPS-15 vide this office Order No.4637-76/Promotion SPST To CT Malakand dated 27-7-2015. The Promoted teachers have not completed their 03 years duration which is considered the normal period for promotion.

Now these teachers are faced with great financial crunch due to not awarding BPS-15 as CT and premature increment.

Therefore it is humbly requested to grant sanction under FR-22(13) regarding their pay fixation in BPS-15.

Your cooperation in this regard will be highly valued. List of the teachers concerned is attached herewith.

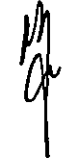
S/K



DISTRICT EDUCATION OFFICER (M)  
MALAKAND AT BATKHELA



**ATTESTED**



**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2016

Alam Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Department

(RESPONDENT)  
(DEFENDANT)

I/We Alam Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** 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 cost. 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.

Dated. \_\_\_/\_\_\_/2016

  
\_\_\_\_\_  
CLIENT

  
\_\_\_\_\_  
**ACCEPTED**  
**NOOR MOHAMMAD KHATTAK**  
**(ADVOCATE)**

OFFICE:  
Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.  
Phone: 091-2211391  
Mobile No.0345-9383141

OFFICE OF THE  
District Education Officer (M)  
Malakand at Batkhela  
No. \_\_\_\_\_/Pay Protection/CT,s  
Dated Batkhelka the \_\_\_/4/2016

To

The District Accounts Officer  
Malakand.

Subject: **PAY PROTECTION**

Memo:

Reference is made to the Promotion order of PST to CT issued vide this office Endst;No.4637-76/Promotion SPST to CT Malakand dated 27-7-2015. In this order the cases of those teachers who have not completed their 03 years tenure at SPST were objected by your office that these teachers have not completed their normal tenure i.e 03 years on BPS-14, which is mandatory for promotion. The three years period of three completed on 09-2-2016.

Now it is requested that the pay of the following teachers may be released Wef,28-7-2015 to 09-2-2016 on BPS-14 and Wef,10-2-2016 on BPS-15.

S #	Name of Teacher	Place of duty.
1	Muhammad Tariq CT	GHS Badragga
2	Muhammad Zahir Shah <del>CT</del>	GHS Badragga
3	Alam Khan CT	GHS No.1 Skhakot

(SYED MAN ZAR JAN SAJID)  
DISTRICT EDUCATION OFFICER (M)  
MALAKAND AT BATKHELA

Endst;No. 2587-89 /Pay Protection CT/DEO(M) Malakand;

Dated Batkhela the, 18 /4/2016.

Copy forwarded to the:-

1. District Accounts Officer Malakand.
2. Principal Concerned.
3. Teachers Concerned.

  
DISTRICT EDUCATION OFFICER (M)  
MALAKAND AT BATKHELA



OFFICE OF THE  
District Education Officer (M)  
Malakand at Batkhela  
No. \_\_\_\_\_/Pay Protection/CT,s  
Dated Batkhelka the \_\_\_\_/4/2016

To

The District Accounts Officer  
Malakand.

Subject: PAY PROTECTION

Memo:

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2	Muhammad Zahir Shah CT	GHS Badragga
3	Alam Khan CT	GHS No.1 Skhakot

(SYED MAN ZAR JAN SAJID)  
DISTRICT EDUCATION OFFICER (M)  
MALAKAND AT BATKHELA

Endst; No. 2557-89 /Pay Protection CT/DEO(M) Malakand;

Dated Batkhela the, 15 /4/2016.

Copy forwarded to the:-

1. District Accounts Officer Malakand.
2. Principal Concerned.
3. Teachers Concerned.

  
DISTRICT EDUCATION OFFICER (M)  
MALAKAND AT BATKHELA

987