# FORM OF ORDER SHEET

Court of		. "			·	_
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	111851					
	(4)21				-	
No -		٠,	/2020			•

No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
-	18/11/2020	The appeal presented today by Mr. Umar Farooq Advocate may
		be entered in the Institution Register and put to the Learned Member for
		proper order please.
-		REGISTRAR.
		This case is entrusted to S. Bench for preliminary hearing to be put
		up there on 1-3-2021
,	J 76	MEMBER(J)
		winder (1)
. 01		The learned Member Judicial Mr. Muhammad Jamal Khar leave, therefore, the case is adjourned. To come up for me before S.B on 26.07.2021.
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# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

ADDRAY NO	10000
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## GHULAM FAROOQ VS EDUCATION DEPTT:

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4.	Departmental Appeal	D	7
5.	Service Tribunal Judgment	E	8-9
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عال کاروق APPELLANT

THROUGH:

UMAR FARØOQ

**ADVOCATE** 

CELL NO. 03138901647

Note: Sir,

Spare copies will be submitted After submission of the case.

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1452/2020

Kbyber Pakhtukhwa Service Tribunal.

MR. GHULAM FAROOQ TT (BPS-16) GMS, KAZA KADI DISTRICT MOHMAND Pérsonnel. Number: 00102168

191.10

ADDELLANT

#### **VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 5- The Director of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT. 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE OF THE APPELLANT DURING WINTER & SUMMER VACATIONS AND AGAINST NO ACTION TAKEN 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 illecto-dato to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the payment of all outstanding Registramount of Conveyance allowance which have been deducted previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

#### R/SHEWETH ON FACTS:

- 1. That the appellant is serving in the Elementary & Secondary Education Department as **TT (BPS-16)** quite efficiently and up to the entire satisfaction of their superiors.
- 2. That the Conveyance Allowance is admissible to all the Civil servants and to this effect a Notification No. FD(PRC)1-1/2011 dated 14.07.2011 was issued. That later on vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees working in BPS-1 to 15 were enhance/revised while employees from BPS-16 to 19 have been treated under

the previous Notification by not enhancing their conveyance allowance. Copy of the Notification dated 20.12.2012 are attached as annexure

- 5. That some of teachers of different pay scale approached to this august Tribunal in different service appeals which allowed by this august tribunal vide its Judgment No 1452/2019 titled Maqsad Hayat versus Education Department Dated 11-11-2019...... E.
- 6. That the appellant also prayed to be treated through the principals of consistency for allowing such relief which was granted in appeal No. 1452/2019 titled Maqsad Hayat versus Education Department in Judgement Dated 11.11.2019.
- 7. That where after the appellant waited for the statutory period of ninety days but no reply has been received from the respondents. That appellant feeling aggrieved and having no other remedy filed the instant service appeal on the following grounds amongst the others.

#### **GROUNDS:**

- A- That the action and inaction of the respondents regarding deduction of conveyance allowance for vacations period/months is illegal, against the law, facts, norms of natural justice.
- B- That the appellant have not been treated by the respondent Department in accordance with law and rules 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 action of the respondents is without any legal authority, Discriminatory and in clear violation of fundamental rights duly conferred by the Constitution and is liable to be declared as null and void.

- D- That there is clear difference between leave and vacation as leave is applied by the Civil Servant in light Government Servant. Revised Leave Rules, 1981 while the vacations are always announced by the Government, therefore under the law and Rules the appellant fully entitled for the grant of conveyance allowance during vacations period.
- E-That the Government Servants Revised Leave Rules, 1981 clearly explain that the civil servants who avail the vacations are allowed only one leave in a month whereas, the other civil servants may avail 04 days leave in a calendar months and the same are credited to his account and in this way he may avail 48 days earned leave with full pay, whereas the Government servants to avail vacation such as appellant is allowed one day leave in a month and twelve (12) days in a year and earned leave for twelve days in a year are credited to his account and there is no question of deduction of conveyance allowance for vacation period, the respondents while making the deduction of conveyance allowance lost sight of this legal aspect and illegally and without any authority started the recovery and deduction of conveyance allowance from appellant.
- F- That as the act of the respondents is illegal, unconstitutional, without any legal authority and not only discriminatory but is also the result of malafide on the part of respondents.
- G- That appellant has the vested right of equal treatment before law and the act of the respondents to deprive the petitioners from the conveyance/allowance is unconstitutional and clear violation of fundamental rights.
- H- That according to Government Servants Revised leave Rules, 1981 vacations are holidays and not leave of any kind, therefore, the deduction of conveyance allowance in vacations is against the law and rules.
- I- That according to Article 38 (e) of the Constitution of Islamic Republic of Pakistan, 1973 the state is bound to reduce disparity in the income and earning of individuals including persons in the services of the federation, therefore in light of the said Article the appellant fully entitle for the grant of conveyance allowance during vacations.
- J- That the petitioners seeks permission of this Honorable Court to raise any other grounds available at the time of arguments.

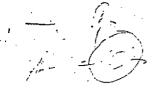
It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for under the golden principals of consistency.

**GHULAM FAROOQ** 

THROUGH:

UMAR FAROOQ ADVOCATE







### GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGULATION WING) -

NO. FD/SC/SR-//V8-52/2012 Dated Pashswar the: 20-12-2012

From

The Secretary to Govi, of Khyber Pashtupkhwa. Finance Department, Penhavear.

Tê:

नेपी नेबोजबतीकदिवारिक उद्यायको हुई दि Govi, जो स्टेल्ट्रेस निवारिकारी होता.

The Scolor Member, Board of Reverse, Phyber Pakhtualinea. The Secretary to Governor Kriyber Paking alkawa

The Secretary to Chief Missier, Khyber Pakhlandiwa.

The Societies, Provincial Aspendig Kinds Pallabethina

All Heads of Attached Department in Knyher Pakhunkhwa

Ağ Üisinet Coordination Öllicemusi Xiyêtêr Pakiltenkires.

AP Political Agents / District & Semions Jukges in Rhytter Political Agents /

The Registral Peshavar Hab Cost. Peshavor

The Charmen Poblic Service Correspon, Khyber Pokhtus kawa.

The Chairman, Bereset Taberel, Kiyoer Pakhlurahwa.

To Bleck

REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA, PROVINCIAL GOVERNMENT BPS 1-19

Dear Sir.

The Government of Khyder Politications has been pleased to enhance / revise the rate of Conveyonce Allowance admissible to all the Provinces Civil Servantia Gover ්ස් Xinyber Pashtunishwa (woykang ක් BPS-1 to BPS-15) w.e.i from 1° September, 2012 ක් the following rates. However, the conveyance allowance for employees in SFS-15 to BPS-19 ,ठेर्वाततात्रहाः ः तथानानां क्षि

						_
1	S.NO	5P5		EXISTING RATE (PH)	REVISED RATE (PM)	
	1.	1-4		25.1,500/-	Rs.1.700/-	ļ.
	2.	5-10		Ps.1,500/-	Rs.1,840/-	
	7	11:15	1	95.2,600/-	Rs.2,720/-	• .
	٠. ا	16-19		Rs.5,000/-	R\$,5,000/=	<u>:</u> `

Compagance Allowance at the above rates per month shall be admissible to Those SPS-17, 18 and 19 differs who have not seen sanctioned efficial vehicles.

Yours Faithfully,

(Sahibzada Sacod Alumad) Secretary Finance

Endyte NO. FINSONSTE-TIPS-52:2012.

Danel Legingwar the HO Decomport, This

A Copy is forwarded for information to the:-

Abosembni Geriaal Panaer Hanitzakina, Patigosi

Secretaines to Government of Punjab, South & Sportnership Finance Dependenced

All Aurosomous / Seed Abbasemous Sectes in Kingson Pakirtumkhas

Adalitaasi Sermisel (Re

NANH

# GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGUALTION WING)

NO.FD/SO(SR-II)/52/2012 Dated Peshawar the: 20:12.2012

From-

The Secretary to Govt: of Khyber Pakhtunkhwa. Finance Department, Peshawar.

Τo

- 1. All administrative Secretaries to Govt: of Khyber Pakhtunkhwa:
- 2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
- 3. The Secretary to Governor, Khyber Pakhtunkhwa.
- 4. The Secretary to Chief Minister, Khyber Pakhtunkhwa.
  - 5. The Sccretary, Provincial Assembly, Khyber Pakhtunkhwa.
  - 6. All Heads of attached Departments in Khyber Pakhtunkhwa.
  - 7. All District Coordination Officers of Khyber Pakhtunkhwa...
  - S. All Political Agents/District & Session Judge in Khyber Pakhtunkhwa.
  - 9. The Registrar Peshawar High Court, Peshawar.
  - 10. The Chairman Public Service Commission, Khyber Pakhtunkhwa.
  - 11. The Chairman, Service Tribunal, Khyber Pakhtunkhwa.

Subject: REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA: PROVINCIAL GOVERNMENT BPS-1-19

Dear Sir,

The Government of Khyber Pakhtunkhwa has been pleased to enhance the trace of Conveyance Allowance admissible to all the Provincial Civil Servants Govt: of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) welf from 1st September, 2012 at the following rates. However, the conveyance allowance for employees in BPS-16 to BPS-19 will remain unchanged.

S.No.	BPS	Existing Rate (PM).	Revised Rate (FM)
1.	1-4	Rs. 1,500/-	Rs. 1,700/-
2	5-10	Rs. 1,500/-	Rs. 1,840/-
3.	11-15	Rs. 2,000/-	Rs. 2,720/-
4.	16-19	Rs. 5,000/-	Rs. 5,000/-

2. Conveyance Allowance at the above rates per month shall be admissible to those BPS-17, 18 and 19 officers who have not been sanctioned official vehicle.

Your Faithfully

(Sahibzada Saeed Ahmad) Secretary Finance

Endst No. FD/SO(SR-ID8-52/2012 Dated Peshawar the 20th December; 2012

ATTESTED

#### Government of Pakistan **District Accounts Office GHALANAI** Monthly Salary Statement (July-2019)



#### Personal Information of Mr GHULAM FAROOQ d/w/s of HUKAM KHAN

Personnel Number: 00102168

CNIC: 0014291060826

NTN:

Date of Birth: 31.01.1970

Entry into Govt. Service: 01.01.1996

Length of Service: 23 Years 07 Months 001 Days

**Employment Category: Active Permanent** 

**Designation: THEOLOGY TEACHER** 

00000016-Min, Of K.A & N.A & S.F.R

DDO Code: MG0005-Agency Education Officer Mohmand

Cash Center:

Payroll Section: 001

GPF Section: 001 Interest Applied: Yes

**GPF** Balance:

435,191.00

Vendor Number: -

GPF A/C No:

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil

**BPS: 16** 

Pay Stage: 13

Wage type		Amount	Amount		Amount
0001	Basic Pay	38,670.00	1000	House Rent Allowance	2,727.00
1528	Unattractive Area Allow	1,000.00	1947	Medical Allow 15% (16-22)	1,500.00
2148	15% Adhoc Relief All-2013	705.00	2199	Adhoc Relief Allow @10%	476.00
2211	Adhoc Relief All 2016 10%	2,448.00	2224	Adhoc Relief All 2017 10%	3,867.00
2247	Adhoc Relief All 2018 10%	3,867.00	2264	Adhoc Relief All 2019 10%	3,867.00

#### **Deductions - General**

Wage type		Amount	Wage type		Amount
3300	GPF Other Govt.Emp	-3,340.00	3609	Income Tax	-115.00
3661	E.E.F (Exchange)	-125.00	3701	Benevolent Fund(Exchange)	-250.00
3705	R. Ben & Death Comp(Exch)	-650.00			0.00

#### **Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
230411	Description	1 i meipai amount		Dalance

**Deductions - Income Tax** 

Payable: 5,476.15

Recovered till JUL-2019:

115.00

Exempted: 4106.16

Recoverable:

1,254.99

Gross Pay (Rs.):

59,127.00

Deductions: (Rs.):

4,480.00

Net Pay: (Rs.):

54,647.00

Payee Name: GHULAM FAROOO

Account Number: 010-0901

Bank Details: UNITED BANK LIMITED, 211384 GHALANAI GHALANAI, MOHMAND AGENCY

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: ORA KOR AMBAR MOHMAND AGENCY GHALLANAI MOHMAND AGENCY

City: GHALLANAI

Domicile: NW - Khyber Pakhtunkhwa

· Housing Status: No Official

Temp. Address:

City:

Email: ghulampk33@gmail.com

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# Government of Pakistan District Accounts Office GHALANAI Monthly Salary Statement (May-2019)



#### Personal Information of Mr GHULAM FAROOQ d/w/s of HUKAM KHAN

Personnel Number: 00102168

CNIC: 0014291060826

NTN:

Date of Birth: 31.01.1970

Entry into Govt. Service: 01.01.1996

Length of Service: 23 Years 05 Months 001 Days

**Employment Category: Active Permanent** 

Designation: THEOLOGY TEACHER

00000016-Min. Of K.A & N.A & S.F.R

Payroll Section: 001

DDO Code: MG0005-Agency Education Officer Mohmand

Cash Center:

GPF A/C No: '

GPF Section: 001 Interest Applied: Yes

**GPF Balance:** 

428.511.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil

**BPS: 16** 

Pay Stage: 13

Wage type		Amount	Amount Wage type		e Amount	
0001	Basic Pay	38,670.00	1000	House Rent Allowance	2,727.00	
1210	Convey Allowance 2005	5,000.00	1528	Unattractive Area Allow	1,000.00	
1947	Medical Allow 15% (16-22)	1,500.00	2148	15% Adhoc Relief All-2013	705.00	
2199	Adhoc Relief Allow @10%	476.00	2211	Adhoc Relief All 2016 10%	2,448.00	
2224	Adhoc Relief All 2017 10%	3,867.00	2247	Adhoc Relief All 2018 10%	3,867.00	

#### **Deductions - General**

Wage type		Amount		Wage type	Amount
3300	GPF Other Govt,Emp	-3,340.00	3609	Income Tax	-20.00
3661	E.E.F (Exchange)	-125.00	3701	Benevolent Fund(Exchange)	-250.00
3705	R. Ben & Death Comp(Exch)	-650.00			0.00

#### **Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax** 

Payable: 1

1,000:00

Recovered till MAY-2019:

230.00

Exempted: 750.02

Recoverable:

19.98

Gross Pay (Rs.):

60,260.00

**Deductions: (Rs.):** 

-4,385.00

Net Pay: (Rs.):

55,875.00

Payee Name: GHULAM FAROOQ

Account Number: 010-0901

Bank Details: UNITED BANK LIMITED, 211384 GHALANAI GHALANAI, MOHMAND AGENCY

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: ORA KOR AMBAR MOHMAND AGENCY GHALLANAI MOHMAND AGENCY

City: GHALLANAI

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: ghulampk33@gmail.com



The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ACTION OF THE CONCERNED AUTHORITY BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE DURING WINTER & SUMMER VACATIONS.

#### Respected Sir,

With due respect it is stated that I am the employee of your good self Department and is serving as TT (BPS-16) quite efficiency and up to the entire satisfaction of the superiors. It is stated for kind information that Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. Later on vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees working in BPS-I to 15 were enhance/revised while employees from BPS-15 to 19 have been treated under the previous Notification by not enhancing their conveyance allowance. Respected Sir, I was receiving the conveyance allowance as admissible under the law and rules but the concerned authority without any valid and justifiable reasons stopped/deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. One of the employee of Education Department in Islamabad filed service appeal No.1888 (R)CS/2016 before the Federal Service Tribunal, Islamabad regarding conveyance allowance which was accepted by the Honorable Service Tribunal vide its judgment dated 03.12.2018. That the august K.P.K service tribunal also allowed the restoration of the conveyance allowance in its judgment dated 11.11.2019 in appeal No 1452/2019 titled Magsad Hayat versus Education Department. Copy attached. That I also the similar employee of Education Department and under the principle of consistency I am also entitled for the same treatment meted out in the above mentioned service appeal but the concerned authority is not willing to issue/grant the same conveyance allowance which is granting to other employees. Copy attached. I am feeling aggrieved from the action of the concerned authority riding deduction of conveyance allowance in vacations period/months preferred Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the concerned authority may very kindly be directed the conveyance allowance may not be deducted from my monthly salary during the winter & Summer vacations.

Dated: 20.07.2020

Your Obediently

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNA
PESHAWAR

APPEAL NO. 1457 /2019

94/10/2m

Mr. Magsad Hayat, SCT (BPS-16), GHS Masho Gagar, Peshawar.....

Dated 24 10/

#### VERSUS

1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.

2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.

4- The Accountant General, Khyber Pakhtunkhwa, Peshawar.

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

RESPONDENTS

APPEAL UDNER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE OF THE APPELLANT DURING WINTER & SUMMER VACATIONS AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

#### PRAYER:

That on acceptance of this appeal the respondents may kindly be directed not to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the payment of all outstanding amount of Conveyance allowance which have been deducted of Conveyance allowance which have been deducted previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in the sisterar favor of the appellant.

#### R/SHEWETH: ON FACTS:

9.1 /26/14

- 1- That the appellant is serving in the elementary and secondary education department as Certified Teacher (BPS-15) quite efficiency and up to the entire satisfaction of the superiors.
- 2- That the Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. That later ion vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees



W

Affect No. 1452/2019 Marcad Hayat is Gost

11.11.2019

Counsel for the appellant present.

Learned counsel referred to the judgment passed by learned Federal Service Tribunal in Appeal No. 1888(R)CS/2016 which was handed down on 03.12.2018. Through the said judgment the issue of payment of Conveyance Allowance to a civil servant during summer and winter vacations was held to be within his entitlement, and the deduction already made from him was to be reimbursed. Similar reference was made to the judgment by Honourable Peshawar High Court passed on 01.10:2019 in the case of appellant.

Learned counsel, when confronted with the proposition that the issue, in essence, was dilated upon by the Federal Service Tribunal and, more particularly, by the Honourable Peshawar High Court in the case of appellant, stated that in case the respondents are required to execute the judgment of Peshawar High Court, the appellant will have no cavil about disposal of instant appeal..

The record suggests that while handing down judgment in the Writ Petition preferred by the appellant, the Honourable High Court not only. expounded the definition of "Pay" as well as "Salary" but also entitlement of a civil servant for the Conveyance Allowance during the period of vacations. It is important to note that the respondents were represented before the High Court during the proceedings.

In view of the above noted facts and circumstances and in order to protect the appellant from a fresh round of litigation which may protract over a formidable period, the appeal in hand is disposed of with observation that the judgment of Honourable Peshawar High Court passed in Writ Petitions including W.P. No. 3162-P/2019 shall be honoured and implemented by the respondents within shortest possible time. The appellant shall, however, be at liberty to seek remedy in accordance with law in case his grievance is not redressed by the respondents within a

ান্ত্ reasonable time. careffer

> File be consigned to the regord. AIVES

ANNOUNCED

11.11.2019

Chairmán

Yeshawa.

## **VAKALATNAMA**

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TIBUNAL, PESHAWAR

·		OF 2020
		(APPELLANT)
GHULAM FAROOQ	,	(PLAINTIFF)
		(PETITIONER)
	<u>VERSUS</u>	(RESPONDENT)
Education Department		(DEFENDANT)
I/We MR. GHULAM FAROOQ		do hereby
appoint and constitute UMAR Facompromise, withdraw or Counsel/Advocate in the above nwith the authority to engage/apa/we authorize the said Advocate all sums and amounts payable or	AROOQ, Advocate, refer to arbitrat noted matter, withou point any other Ade to deposit, withdra	Peshawar to appear, plead, act,
natter.		
		(9 ) (1) (1) (1) (1) (1) (1) (1) (1) (1) (

ACCEPTED J UMAR FAROOO