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Form- A

Court of \_\_\_\_

14002 Case No. Order or other proceedings with signature of judge S.No. Date of order proceedings 1 2 The appeal presented today by Mr. Shahzaullah Yousafzai, 10/11/2020 1-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 01/03/2 MEMBER(J)

01.03.2021

2.

The learned Member Judicial Mr. Muhammad Jamal Khan is on leave, therefore, the case is adjourned. To come up for the same before S.B on 26.07.2021.



### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

## APPEAL NO. \_\_\_\_/2020

# ZIA UL HAQ VS EDUCATION DEPARTMENT

### **INDEX**

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### APPELLANT

### THROUGH: SHAHZULLAH YOUSAFZAI ADVOCATE

Flat no 4, Upper Floor, Juma khan plaza near FATA secretariat, Warsak road, Peshawar 0302-8578851

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

# APPEAL NO.\_\_\_\_/ 2020

Mr Zia Ul Haq S/O Ihsan Ul Haq, DM (BPS-15) Personal No.00259597, GHS Dir Maidan, Kumbar .....APPELLANTakhtukhwa

Lower..... Diary N. 4465

### VERSUS

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

10/11

- 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 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 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 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 and secondary Piledto-da Education Department as drawing master (BPS-15) quite efficiently and up to the entire satisfaction of his 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

- 4- That some employee of E&SE department approached to this august Tribunal against illegal deduction of conveyance allowance in different service appeal which were allowed by this august Tribunal vide its judgment dated 11.11.2019. Copy of the judgment is attached as annexure......**D**.
- 5- That the appellant filed departmental appeal against the illegal action of deduction of conveyance allowance, but the same has not been responded by respondents within statutory period of ninety days. Copy of departmental appeal is annexed as annexure......**E**.
- 6- That feeling aggrieved from action and inaction of the respondents and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

### **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 governed by Government Servant Revised Leave Rules, 1981 while vacations are always announced by the Government, therefore under the law and Rules the appellant is fully entitle 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 aspects 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 discriminatory hence not tenable in the eye of law.
- 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 is 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

APPELLANT

THROUGH: Shahzullah yousafzai & Kamran khan advocates BETTER COPY PAGE- 4

### 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.

#### To:

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 Secretary, 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. Tr. Registrar Peshawar High Court, Peshawar.
- 10. The Chairman Public Service Commission, Khyber Pakhtunkhwa,
- 11. The Chairman, Service Tribunal, Khyber Pakhtunkhwa.

### Subject: <u>REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE</u> <u>CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA. PROVINCIAL</u> <u>GOVERNMENT BPS-1-19</u>

Dear Sir,

The Government of Khyber Pakhunkhwa has been pleased to enhance/revise the rate of Conveyance Allowance admissible to all the Provincial Civil Servants Govt: of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) w.e.f from  $1^{st}$  September, 2012 at the following rates. However, the conveyance allowance for employees in BPS-16 to BPS-19 will remain unchanged.

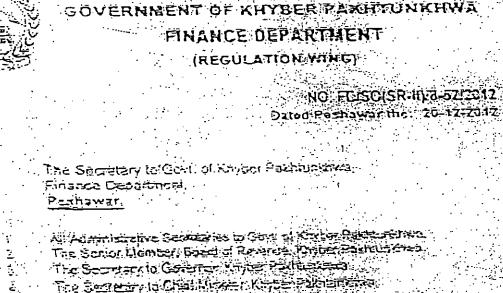
S.No	BPS	Existing Rate (PM)	Revised Rate (PM).
1.	1-4	Rs. 1.500/-	Rs. 1,700/-
2.	5-10	Rs. 1,500/-	Rs. 1,840/-
3:	11-15	Rs. 2,000/-	Rs. 2,720/-
4.	16-19	Rs. 5.000/-	Rs. 5,000/-

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-II)8-52/2012 Dated Peshawar the 20th December, 2012



The Secretary Id Chall Modern Kington Relationship The Secretary Id Chall Modern Kington Relationship All Heads of Albaches Decarements in Knyther Bakhana An Cistley Coordination Officerson Angles Pacificiantines As Policical Agents, District & Secretors I. Spear in Anster Pacificantines As Policical Agents, District & Secretors I. Spear in Anster Pacificantines As Challenge Resonant Hydro Coord Pechanan The Registran Resonant Hydro Coord Pechanan The Challenge Resonant Theorem Reson, Stryber Pokhtunkawa The Challenge Resonant Theorem Reson, Stryber Pokhtunkawa

REVISION IN THE PATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL EMPLOYEES OF THE KHYBER PARHTUNKHWA PROVINCIAL GOVERNMENT BPS 1-12

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From:

The Government of Vinder Politiceting has been reason to enhance of orvise the rate of Conveyonce Allowance admiced everythe Provinces Ovil Serients Gate & Novem Persisting there (Working & EPS-1 in ERS-15) with from 1<sup>-</sup> Sectors of all of the following rates. However, the conveyonce allowance for employees in SPS-15 to GPS-19 will remain urkhanget

S.NO 675	EXISTING RATE (PH) - REVISED RATE (PM)-1
	Rs 1,700/-
2 5-10	Rs.2.720/-
<u> </u>	R\$.5,000/***

2. Conveyance Allevades at the above dues attracted and be acreative to the above dues attracted and a sector sector at the sect

attested

Endsi: NO. FD:SO(SR-17)8-51:2012

Datel Petitivar the 20" December, 2 -

Yours Farniults,

(Sahibada Sacod Annad) Secretary Fazaros

INTAZ AYUB

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#### Dist. Govt. NWFP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (July-2020)

Entry into Govt. Service: 23.07.1995

### Personal Information of Mr ZIAUL HAQ d/w/s of IHSANUL KHAQ

.....

CNIC: 10875001177

Personnel Number: 00259597 Date of Birth: 01.05.1975

	D)		
JTN:	K	3.	B-5

N

Length of Service: 25 Years 00 Months 010 Days

Vendor Number: - Pay and Allowances:	Pay scale: BPS For - 2017	Pay Scale Type: Civil	BPS: 16	Pay Stage: 20
GPF A/C No: EDUDA009463	Interest Applied: Yes	GPF Balance:	-	293,909.00
Payroll Section: 001	GPF Section: 001	Cash Center: 05		· · ·
DDO Code: DA6337-				· · ·
Designation: DRAWING MAS	TER	80778307-DISTRICT G	OVERNMEI	NT KHYBE
Employment Category: Active	remporary			

	Wage type	Amount	Wage type		Amount
0001	Basic Pay	49,310.00	1000	House Rent Allowance	2,727.00
1924	UAA-OTHER 20%(16 G/NG)	1,500.00	1947	Medical Allow 15% (16-22)	1,845.00
2148	15% Adhoc Relief All-2013	950.00	2199	Adhoc Relief Allow @10%	637.00
2211	Adhoc Relief All 2016 10%	3,508.00	2224	Adhoc Relief All 2017 10%	4,931.00
2247	Adhoc Relief All 2018 10%	4,931.00	2264	Adhoc Relief All 2019 10%	4,931.00

#### **Deductions - General**

	Wage type	Wage type Amount Wage type		Amount	
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-948.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

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

Loan	Descri	ption	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal		430,000.00	-12,000.00	346,000.00
<b>Deduction</b> Payable:	s - Income Tax 15,161.95 Recovered	ed till July-2020: 94	18.00 Exempted	: 3790.02 Recover	able: 10,423.93
Gross Pay	(Rs.): 75,270.00	Deductions: (Rs.):	-17,888.00	Net Pay: (Rs.): 57	,382.00
Account N	ne: ZIAUL HAQ lumber: 000100411589900 ils: ALLIED BANK LIMI		R DIR D.J.KOBAR DIF	R, DIR	- - -
Account N	lumber: 000100411589900		R DIR D.J.KOBAR DIF Earned:	R, DIR Balance:	· · · ·
Account N Bank Deta Leaves:	lumber: 000100411589900 ils: ALLIED BANK LIMI	TED, 250849 D.J.KOBA Availed:			
Account N Bank Deta Leaves:	lumber: 000100411589900 ils: ALLIED BANK LIMI Opening Balance: Address: VILL.BISHGRA	TED, 250849 D.J.KOBA Availed:	Earned:		s: No Official
Account N Bank Deta Leaves: Permanent	lumber: 000100411589900 ils: ALLIED BANK LIMI Opening Balance: Address: VILL.BISHGRA	TED, 250849 D.J.KOBA Availed: MMMAIDAN	Earned:	Balance:	s: No Official

#### Dist. Govt. NWFP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (August-2020)

### Personal Information of Mr ZIAUL HAQ d/w/s of IHSANUL KHAQ

 Personnel Number: 00259597
 CNIC: 10875001177

 Date of Birth: 01.05.1975
 Entry into Govt. Service: 23.07.1995

NTN:

Length of Service: 25 Years 01 Months 010 Days

### **Employment Category: Active Temporary**

Designation: DRAWING MAST	80778307-DISTRICT GO	OVERNME	NT KHYBE		
DDO Code: DA6337-					
Payroll Section: 001	GPF Section: 001	Cash Center: 05		,	
GPF A/C No: EDUDA009463	Interest Applied: Yes	<b>GPF Balance:</b>		309,249.00	
Vendor Number: -					
Pay and Allowances:	Pay scale: BPS For - 2017	Pay Scale Type: Civil	BPS: 16	Pay Stage: 20	
	· · ·		-	······································	

Wage type		Wage type Amount		Amount
0001	Basic Pay	49,310.00	1000 House Rent Allowance	2,727.00
1210	Convey Allowance 2005	5,000.00	1924 UAA-OTHER 20%(16 G/NG)	1,500.00
1947	Medical Allow 15% (16-22)	1,845.00	2148 15% Adhoc Relief All-2013	950.00
2199	Adhoc Relief Allow @10%	637.00	2211 Adhoc Relief All 2016 10%	3,508.00
2224	Adhoc Relief All 2017 10%	4,931.00	2247 Adhoc Relief All 2018 10%	4,931.00
2264	Adhoc Relief All 2019 10%	4,931.00		0.00

#### **Deductions - General**

Wage type		Amount		Wage types	Amou	
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund		-800.00
3609	Income Tax	-1,136.00	3990	Emp.Edu. Fund KPK	•	-150.00
4004	R. Benefits & Death Comp:	-650.00				0.00

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

Loan	Description			Principal amount	Deduction	Balance		
6505	GPF Loan Principal Instal		430,000.00	-12,000.00	334,000.00			
<b>Deductio</b> Payable:	ns - Income Tax 17,911.95		red till August-2020:	2,084.00 Exempted	: 4477.05 Recove	erable: 11,350.90		
Gross Pay	y (Rs.): 80,2	270.00	Deductions: (Rs.):	-18,076.00	Net Pay: (Rs.): 6	2,194.00		
Account	ime: ZIAUL HAO Number: 000100 tails: ALLIED BA Opening E	41158990 ANK LIM	022 ITED, 250849 D.J.KOBA Availed:	R DIR D.J.KOBAR DIF Earned:	, DIR Balance:			
Permaner	nt Address: VILL	BISHGR	AM MAIDAN			•		
	R LOWER			Domicile: NW - Khyber Pakhtunkhwa		Housing Status: No Official		
Temp. Ac					Trousing Dut			
City:			Email:					
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APPELLAN

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNA PESHAWAR

# APPEAL NO. 1452 1/2019

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

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 THE APPELLANT DURING WINTER & SUMMER OF 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 Fledte-day previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in Registrar favor of the appellant.

R/SHEWETH: ATTESTON FACTS:

24/10/19

MER

Deshawar

1- That the appellant is serving in the elementary and secondary education department as Certified Teacher (BPS-15) quite efficiency Paking 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

Appeal No. 1452/2019 Markad Hayat vs Giovt

8

Counsel for the appellant present.

11.11.2019

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Pcshawar

noural

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 reasonable time.

Chairma

File be consigned to the record.

ANNOUNCED 11.11.2019 The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

E-9

Subject:

DEPARTN	<u>/IENTA</u>	<u>L AP</u>	PEAL	AGAINS	T THE	IMPUC	<u>SNED</u>
ACTION	OF	THE	CON	CERNED	AUTH	IORITY	BY
ILLEGAL	LY A	AND	UNLAV	VFULLY	DEDU	CTING	THE
CONVEY	ANCE	ALL	OWAN	CE DU	RING	WINTER	2 &
SUMMER	VACA	TIONS	5				

Respected Sir,

With due respect it is stated that I am the employee of your good self Department and was serving as DM (BPS-15) 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 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. 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 I am 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 regarding deduction of conveyance allowance in vacations period/months preferred this 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: .01.08.2020

ATTESTED

our Obediently

DM, GHS Kumbar, Dir Lower.

To 🧕

# VAKALATNAMA

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

**OF 2020** 

Zin uher

# VERSUS

EDUCATION DEPTT:

(RESPONDENT) \_\_(DEFENDANT)

(APPELLANT)

\_(PLAINTIFF) (PETITIONER)

hereby appoint and constitute SHAHZULLAH Do YOUSAFZAI, 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. /2020

I/We

Zinulhag CLIENT(S)

ACCEPTED SHAHZULLAH YOUSAFZAI

KAMRAN KHAN **ADVOCATES**