

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

Appeal No. 1373/2023

Shair BadshahAppellant


VERSUS

The Secretary E&SE Peshawar & Others..... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

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3	Copy of Retirement order Dated 10-09-2014	"B"	6
4	Copy of Notification Dated 07-01-2014 & Copy of Service Book	"C & D"	7-21
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 Respondent NO: 4
ZAHID HUSSAIN
 District Education Officer
 Male Jor Ghar

(32)

1

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

Appeal No.1373/2023

Shair BadshahAppellant

VERSUS

**Khyber Pakhtunkhwa
Service Tribunal**
Diary No. 10691
Dated 22-1-2024

The Secretary E&SE Peshawar & Other..... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS:

RESPECTFULLY SHEWETH: That the respondents submit as under :

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no cause of actions/locus standi.
2. That the instant appeal is filed by suppressing the material facts from this honorable Tribunal, hence not maintainable.
3. That the Minor penalty of withholding of (02) two increments for the year 2012-13 was imposed upon the appellant on account of willful absence from duty without any information and sanction of leave by the competent authority. The appellant remained absent with effect from 01-9-2012 to 31-12-2013.
4. That the instant appeal is against the prevailing law & rules.
5. That the instant appeal has been filed just to pressurize the respondents.
6. That the appellant has not come to this honorable tribunal with clean hands.

7. That this honorable tribunal lacks jurisdiction in the instant matter in issue.
8. That the instant appeal is hopelessly time barred.
9. That the instant appeal is bad for misjoinder and non-joinder of necessary & proper parties.

FACTS:-

1. In reply to Para No-1, it is submitted that the appellant was appointed in Education Department as PST vide Endst: No.4921-34 dated 14-12-1987. *(Copy of appointment order is attached as annexure-A)*

2. That para No 2 pertains to the service career of the appellant.

3. In reply to Para-03, It is submitted that the appellant applied for premature retirement and was retired from service on the basis of "premature retirement" on 10-9-2014

(Copy of retirement order is attached as annexure-B)

4. That para-04 as composed is in-correct, it is submitted that the appellant was absent from his duty with effect from 1-9-2012 to 31-12-2013 without any information /leave application and without any sanctioned leave by the competent authority. After finalization of disciplinary proceedings, minor penalty of stoppage of two increment of 2012 & 2013 with accumulative effect was imposed upon the appellant vide notification No: 1518-21 Dated: 07-1-2014. It is pertinent to mention that the appellant was retired from service on 10-9-2014.

(Copy of notification & Service Book attached as annex-C&D)

5. The para No: 05 is in-correct and hence denied. As replied above.

6. In reply to para No: 06, it is submitted that the appellant has admitted his absence from duty without any information. The appellant was proceeded under the rules on account of absence from duty without information & process.

7. In-correct and hence denied. As replied in above paras.

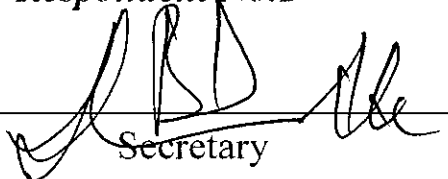


GROUND

- A) In-correct, hence denied. The order was passed as per rules & regulations of the department.
- B) In reply to para No: B of the Grounds, it is submitted that the appeal of the appellant was rejected by the competent authority vide Number:288/F.No-162/vol:14/Appeal of PST (M) General dated: 02-11-2018.
- C) That complete & comprehensive reply has already been given in preceding para above.
- D) That the respondents seek permission to argue further point at the time of arguments.

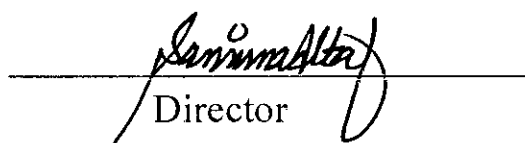
It is therefore; in the light of above stated facts & circumstances most humbly prayed that the instant appeal may kindly be rejected/dismissed with cost.

Respondent No.1


Secretary

Elementary & Secondary Education
Peshawar
Masood Ahmad

Respondent. No.3


Director

Elementary & Secondary Education
Peshawar
Mst.Samina Altaf
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Respondent. No.4



District Education Officer (Male)
Elementary & Secondary Education Tor Ghar

Zahid Hussain
District Education Officer
Male Tor Ghar.

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

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Appeal No.1373/2023

Shair Badshah **Appellant**

VERSUS

The Secretary E&SE Peshawar & Other..... **Respondents**

AFFIDAVIT

I, ZAHID HUSSAIN DEO (CM) District Torghar, do hereby solemnly affirm on oath, that the contents of Parawise comments are True & Correct in the best of my knowledge & belief and nothing has been concealed or suppressed from this honorable tribunal.

It is further stated on oath in this appeal, The answering respondents have neither been placed ex-parte nor their defence have been struck off.

ATTESTED



[Signature]
DEPONENT
Zahid Hussain
DEO (CM) Torghar

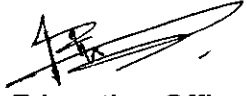


OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT TOR GHAR



AUTHORITY LETTER

Mr. Mia Sher Shah Superintendent of District Education officer Male Tor Ghar is hereby authorized to appear in service tribunal Peshawar in government cases on Dated 06-10-2023.


District Education Officer Male
Tor Ghar
District Education Officer
Male Tor Ghar.

BEFORE THE KPK SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 1373 / 2022

Mr. Shair Badshah

28

.....Appellant

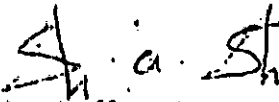
V E R S U S

Govt of KPK through secretary Education & Others

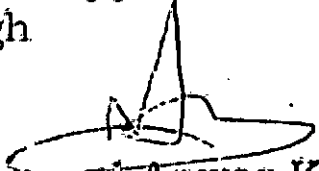
.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Grounds of Service Appeal		1-4
2.	Affidavit		5
3.	Addresses of Parties		6
4.	Copy of 1 st Appointment Order	A	7
5.	Copy of Upgradation PBS-07 to BPS-12	B	8
6.	Copy of Retirement order	C	9
7.	Copy of Supreme Court Judgment	D	10-14
8.	Copy of letter	E	20
9.	Copy of Application / Appeal	F	21
10.	Wakalat Nama		22


Appellant

Through


Muhammad Anwar Khan
(Pushtun Ghari)
Advocate, High Court
Peshawar.

Date: 7/ 5/ 2022

Prayer:

On acceptance of this appeal. The Appellant may be issued the salaries of 2012,2013 and the two increment withheld by Respondent No 4 The Respondents may be Directed to make necessary entries in service book and also adjust the increase in pension after adding two increment

Respectfully Sheweth:

The Appellant most respectfully submits as under:

1. That the appellant was appointed in Education Department as PST. (Copy appointment order is attached as Annexure A).
2. That the Appellant was upgraded from PES-07 to BPS-12.

(Copy of upgrading order is attached as Annexure "B").

3. That the Appellant was retired from the Education Department as PST teacher.

(Copy of Retirement Order is attached as Annexure "C").

4. That the Appellant due to illness Shifted Peshawar. And could not attended his duties at District Tor Ghar and requested Respondents to sanction leave but Respondent No 4 malafide stopped the salaries for seventeen months and also withheld two increments.

- 201
- (25)
5. That the Respondent No. 4 imposed 'double punishment, which is illegal, unlawful and against Natural Justice.
 6. That the Respondent No 4 imposed double punishment just for his absence which was due to domestic problem. The leave without permission with reasonable case is not come under misconduct, as decided by Superior Court in 2008 SCMR 214. (Copy of Judgment is attached as Annexure D).
 7. That the Respondent No 4 sent letter Endst No 2921-24 dated 8-7-2020 to Respondent No. 2 for Sympatric consideration but till date no reply. (Copy of Letter is attached as Annexure E)
 8. That the appellant submitted application / appeal to respondent but all in vain (copy of application are attached as Annexure F).

GROUND S:

- A. •That the impugned order of stopping seventeen months salaries and with held two increments with accumulative effect is unlawful, arbitrary, void, illegal, malafide and as such without lawful authority.
- B. That the Departmental appeal of appellant has not been decided till date which represents malafide intention on the part of the Respondents.
- C. That under the circumstances as mentioned above the impugned order of stoppage of

BEFORE THE KPK SERVICES TRIBUNAL,

PESHAWAR

Service Appeal No. 1373/2023

Mr. Shair Badshah S/o Sadar Nawaz Khan House
No: 6553 Sabza Ali Androon Sard Chah Gate
Mohallah Koche Khan Peshawar.

.....Appellant

V E R S U S

1. Secretary Elementary & Secondary Education
Civil Secretariat, Peshawar.
2. Secretary Finance Department civil Secretariat
Peshawar.
3. Director Elementary & Secondary Education
Khyber Pakhtun Khawa Near Government Shaheed
Hasnain Sharif Higher Secondary School No 1.
Peshawar City.
4. District Education Officer (Male) Tor Ghar.

.....Respondents

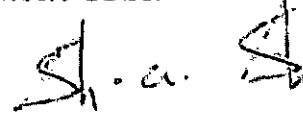

Appeal under section 4 of the
KPK Service Tribunal Act, 1974,
against the stoppage of salaries
with effect from 2013 To 2014
and withheld two increments of
2012-2013 w.e.f 01-09-2012 to
31-12-2013 accumulative effect
imposed upon Appellant.
Double punishment is illegal and
unlawful. Respondent No.4 in
excess of Lawful authority and
against fundamental right Article
13(a) constitution of Islamic
Republic of Pakistan.

salaries and two increments is liable to be set aside.

That the appellant shall also rely on the additional grounds after filling the written statements by the Respondents .

It is humbly prayed that on accepting this appeal the impugned order of stoppage of 17 months salaries and with held of two increment may kindly be set set aside and the appellant may please be allowed 17 months salary as well as two increments withheld by Respondents, Necessary enteris in service book and correction of increase in monthly pension may be Allowed.

The appeal may very kindly be accepted in favour of the appellant against Respondents with cost.


Appellant
Through

Muhammad Anwar Khan
(Pushtun Ghari)
Advocate, High Court

Date: 2/2/2022

Certificate:-

It is certified that no such like appeal has been submitted before this appeal.

Advocate.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHISTAN AT PATTAN.

Office order No. 208
Dated. 14/12/1987

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APPOINTMENT/ADJUSTMENT.

The following candidates are hereby appointed against Vacant PTC Posts in the School noted against each in NPS, 79Rs: 750-31-1370)/FM Fixed plus usual allowances as admissible under the ruled in the interest of Public Service with effect from the date of taking over charge. Def 1-1-1988

S.No.	Name/Father's Name	Residence	From	To	Remarks.
1	Mr. Sher Badshah S/O	Martung			Appointed as
2	Mr. Sar Nawaz Khan (Sar)				M/s. Baw (Kusang) Mandya

NOTE:-

1. Charge reports should be submitted to this Office in Duplicate
2. No TA/DA is allowed any One.
3. They required Health and Agg Certificate.
4. Their Services are liable to termination at any Time without any reason being assigned arrival of trainees.
5. They should not be allowed to take over Charge if their age is less than 18 Years and Above 30 Years.
6. Certificate of all candidates will be checked and in case any Certificate is found Fggus, Service of holder of Such Certificate will be terminated.

14/12/87
District Education Officer,
(Male) Kohistan at Pattan.

Encl: No. 4721-34 A-I Dated Kohistan the 14/12 787

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

- 1:- ADSO (Accounts) Local Officer.
- 2:- ADEO (Academic) Local Office.
- 3:- Candidate Concerned.
- 4:- Office order File.

Attested
[Signature]
29/11/88

14/12/87
District Education Officer,
(Male) Kohistan at Pattan.

Attested
[Signature]
District Education Officer,
(Male) For Char



Annex - "B"

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RETIREMENT ORDER

The competent authority in the Elementary and Secondary Education Tor Ghar is pleased to order the pre-mature retirement of Mr. Sher Bad Shah PST GPS Shaloon Basi Khail w.e.f 01/09/2014.

He is entitle for the grant of encashment in lieu of 304 days LPR

--sd--

District Education Officer (M)
E&SE Tor Ghar

Endst: No 3394-97 /Dated 10/9/2014.

Copy for information to the.

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Tor Ghar at Mansehra.
3. SDEO (M) Judba Tor Ghar.
4. Official Concerned.

[Signature]
Dy: District Education Officer (M)
E&SE Tor Ghar

Attested

[Signature]
Dy District Education Officer
(Male) Tor Ghar

[Signature]

[Signature]

NOTIFICATION

ADO (PIE) Sher Badshah PST: WHEREAS Mr. Sher Badshah Ex-PST GPS Haryana District Tor Ghar proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 on account of his wilful and unauthorized absence from duty

2. AND WHEREAS the accused Teacher was issued show cause notice vide letter No.2048-51 dated 24-09-2012, he submitted his reply to the show cause notice along with other relevant papers.

3. AND WHEREAS the Competent Authority (District Education Officer 'M') after having considered the charges and evidence on record, response to the Show Cause Notice, is of the view that the charges against the accused official have been proved.

4. NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer 'M') is pleased to impose minor penalty of "With held two increments" 2012-2013 upon Mr. Sher Badshah Ex-PST GPS Haryana now in GPS Shaloon District Tor Ghar. The intervening period w.e.f. 01-09 -2012 to 31-12-2013 shall be decided later on, keeping in view his future performance.

District Education Officer (M)
E&SE Tor Ghar

Endst: No ¹⁵⁷⁸⁻²¹ & Dated/ 7/01/2014:

Copy forwarded for information and necessary action to the -

- 1- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2- District Accounts Officer, Tor Ghar at Mansehra.
- 3- SDEO (M) Tor Ghar with the direction that necessary entries should be made in his service book.
- 4- Mr. Sher Badshah PST GPS Shaloon District Tor Ghar.
- 5- Office order file.

M. 07/01/2014
District Education Officer (M)
E&SE Tor Ghar

Attest

M. 07/01/2014
Dy. District Education Officer
(Male) Tor Ghar

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- 1.
- 2.
- 3.

Verification Roll No. _____ dated _____ received back

Left thumb-impression.

Qualification	Date	Qualifications	Date
English		Passed S. S. C Exam First Arts under Roll No. 1955 from Pathankot Board	
Pashtu		B. L. or B. A.	
Urdu		Pleaderships examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications -	
Drill instructing		Passed P.T.C. Condensed Course 1993, under R. No. 1235, etc.	
Court duties		271/500 marks	
Reserve duties		Result declared on 29/5/94	

- 3. R
- 4. F
- 5. D
- 6. E
- 7. I
- 8. 1
- 10. S

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

[Signature]
 Dy. District Education Officer
 (Main) Top Chak

[Signature]
 Dy. District Education Officer
 (Main) Top Chak

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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 *Shahir Badshah*

2. Race *Afghan*

3. Residence *village - Kozelay Martrung P/o Martrung Tok/Afghanistan*
Distt Swat.

4. Father's name and residence *Sarnawaz Khan - do.*

5. Date of birth by Christian era as nearly as can be ascertained *13-7-1961 (thirteen July nineteen hundred sixty one)*

6. Exact height by measurement *5-5*

7. Personal marks for identification

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

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.

9. Signature of Government servant *[Signature]*

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

Attested
[Signature]
By District Education Officer
(Male) Tongchar

[Signature]
[Signature]
D.E.O.
Tongchar

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.	P. y in substantive post	Additional Pay for officiating	Other emolument falling under term "Pay"	Date of appointment	Signature of Government servant
B.P.S. No. 7-(750-31-1370)							
P.T.c E.M.S Bawkarang			750/-			1-1-1988	[Signature]
- Do - PT			1095 -		60 -	1995	
M/s Dhat Challoh Khalil Ramolton			1095/-			6/91	[Signature]
PT. G. Mosque School Patao Aishoray K.			1095/-			1-9/91	[Signature]
- Do - PT. C.P.S Nadray			1095/-			19/92	[Signature]
- Do - K.D.			1095/-			12/92	[Signature]
- Do - PT. C.P.S. Gani Hassan Zia			1480/-			12/93	[Signature]
- Do - Kali Dhaka			1480/-	1561/-		6/94	[Signature]
			1480/-			12/94	[Signature]

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.
			Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government	Government to which debitible		
			Period			

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31-5-91 *Scale revised* *DEO (M) Kohistan*
 Appointed as P.T.C Teacher at G.M.S Baw Karang vide DE.O (M) Kohistan at 14/11/87 dated 14/11/87
 Patan Endst. No. 492/1/34
 Kohistan

31-8-91 *Transf.* *SDEO (M) Kohistan*
 31-7-92 *Transf.* *SDEO (M) Dhaka Kohistan*
 30-11-92 *Embly* *D.E.O. (M) Kohistan*
 30-11-93 *Transfer* *D.E.O. (M) Kohistan*
 31-3-94 *Scale Revised*
 30-11-94 *Transf.* *D.E.O. (M) Kohistan*
 30-11-95 *Embly* *SDEO (M) Kohistan*

Sub. Div. Edu. Officer (M) Kohistan

① Services verified from the Acquittance Roll and other Relevant Record w.e.f. 1-1-88 to 31-12-91

② Award of Added Pay vide D.O. (M) Manshera C/N. 16225-28 dated 30/11/94 w.e.f. 29/5/94.

D.E.O. (M) Kohistan

Services verified from the Acquittance Roll and other Relevant Record w.e.f. 1/1/91 to 31/7/92

Sub. Div. Edu. Officer (M) Kohistan

Transferred from District Kohistan G.P. School Dher Challa Khail, with the condition that his seniority will be considered from the date of taking over charge at G. H.S. School Patan Asheray K.D. vide DEO (M) Manshera Hauschra Endst. No. 9749-54 dated 10-8-92. His services are counted since 10-8-92.

Abdul Wahid
 By District Education Officer (M) Kohistan

9	10	11	12	13		14	15
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 debitable to another Government		
				Period	Government to which debitable		
<i>[Handwritten signatures]</i>	30/11/96	Inc	<i>[Signature]</i> S.D.E.C. (M) Mansehra				Services verified w/f. 1/12/96
<i>[Handwritten signatures]</i>	30/11/97	Inc	<i>[Signature]</i> S.D.E.C. (M) Mansehra				30/11/95 from the Reg Roll & other office record
<i>[Handwritten signatures]</i>	30/11/98	Inc	<i>[Signature]</i> S.D.E.C.				1/12/95
<i>[Handwritten signatures]</i>	30/11/99	Inc	<i>[Signature]</i>				30/11/96
<i>[Handwritten signatures]</i>	30/11/2000	Inc	<i>[Signature]</i> S.D.E.C.				
<i>[Handwritten signatures]</i>	30/11/2001	Inc	<i>[Signature]</i> Dy. D.O (M) MANSEHSA. Dy. D.O.				1/12/91
<i>[Handwritten signatures]</i>	30/11/2007	Scale Revised	<i>[Signature]</i> Dy. D.O (M) MANSEHSA.				30/11/97
<i>[Handwritten signatures]</i>	30/11/2002	Inc	<i>[Signature]</i> Dy. D.O (M) MANSEHSA.				
							Services verified w/f. 1/12/97 to 30/11/99 from the Reg Roll and other office records
							1/12/98
							30/11/99
							1/12/98
							30/11/2000
							1/12/99

Office of the Accountant General
N. W. F. Peshawar.
Pay fixed in the revised basic pay scale 1994
at Rs: 14800-07-26-95-7
M.W. 1994
with next increment on 1-12-2002

Office of the Accountant General
N. W. F. Peshawar.
Pay fixed in the revised basic pay scale 2000
at Rs: 22200-00-20-85-7
M.W. F. 2000
with next increment on 1-12-2002

By District Education Officer
Mansehra

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
G.S. Garhi Hassan Zai			3300/7			1/12/2002	A. a. S.
G.S. Nabraway			3420/1			1/12/03	A. a. S.
y -			3540/1			1/12/04	A. a. S.
<i>Scale revised w.e.f. 1/12/2005 Rs. 2555-140-6755</i>			4095/1			1/7/05	A. a. S.
			4235			1/12/05	A. a. S.
			4375/1			1/12/06	A. a. S.

2555-140-6755
 4095/1
 11-07-2005
 2335
 M. Shah
 Assistant

Attested
 M. Shah

E1
 Co
 2
 3
 1

1	2	3	4	5	6	7
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
75 C.P. Exam. H... 22.11.11	off.	-	16480/-	1642/-	-	12/95
	do		1713/-			12/96
	do		1804/-			12/97
-11-	-		1885/-			12/98
			1966/-			12/99
			2047/-			12/2000
			2128/-			12/2001
		Scale Revised w.e.f. 1/11/2001 (2200-120-5820)				
			3180/-			12/2001

Alb...
Al...
Dy. District Education Officer
(Male) Tor Bhar

(15)

1	2	3	4	5	6	7
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.	P. y in substantive post.	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment
g/s Gurhi Hassan Zai			3300/7			12/2002
g/s Madhavi			3410/1			12/03
			3540/1			12/04
Scale revised w.e.f 17/2005 Rs. 2555-140-6755						
			4095/1			12/05
			4235			12/05
			4375/1			12/06

OF
 Pay Band
 Rs. 2555-140-6755
 Rs. 4095/-
 with effect from 07/2005
 M. Bhat
 Pay Band
 eshawar

(Handwritten signature)

Dy District Education Officer
 (State) Ghar

Signature and designation of the head of the office or the attesting officer (columns 1 to 8)	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 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 debitible to another Government		
				Period	Government to which debitible		
	30/11/03	Ty/1mc	Mv DDC (M)				<p>Service verified w.c.f. 1/11/2000 to 30/11/2007 from the Acq. Roll and other office record.</p> <p>By: D.O (M) MANSEHA.</p>
	30/11/04	1mc	Mv DDC (M)				
	30/6/05	8/Rev	Mv DDC (M)				
	30/11/05	1mc	Mv DDC (M)				
	30/11/06	1mc	Mv DDC (M)				
	12/07	4/Rev	Mv DDC (M)				
	<p>Sanction of 36000/- as official order vide No 1389/1390 dt 23/8/05</p>						
	<p>Sanction of 4th Advance Rs. 36000/- in two equal instal Rs. 18000/- vide D.O (Sd) Manshra under Endst. No. 928-21 dated 22/8/05</p>						
	<p>By: District Officer (Male) Prg: Manshra</p>						
	<p>T. No 4054 dated 9-16-03</p>						
	<p>Drawn Leave Salary 9 24/11/07 to 30-11-07 amounting to Rs. 3859/-</p>						
	<p>Attested</p>						
	<p>By: District Education Officer</p>						

Leave Sanctioned with effect from 17/11/2004 to 30/11/2007 14 days on full pay vide D.O Primary Schools Manshra under E/No. 5390-92 dated 5/9/2002

Service Verified for the period w.e.f. 1/11/2001 to 30/11/2002 from Acquittance rolls & other relevant record of this Office.

Dy: D.O (M)
Prg: Manshra.

T. No 4054 dated 9-16-03
Drawn Leave Salary 9 24/11/07 to 30-11-07 amounting to Rs. 3859/-

Dy. District Education Officer

Shri Bad Shah

OPTION

PST GGPS Kander Tamare.

elect for the award of upgradation in the lower scale on 02/12/2007. I will not claim any sort of arrear for the period w.e.f 01/10/2007 to 01/12/2007.

Signature

A. A. B.

DDG/Pr: Manshra

[Signature]
DDG Manshra

of
ment

Signature of
Government
servant

temporary

for pension
under Art. 371
C. S. R.

PST

BPS No. 9 Scale Revised w.e.f 1/7/07 Rs. 2940-160-7740

G/S Kander Tamare.

5020/-

1⁷/₀₇

A. A. B.

5180/-

1¹²/₀₇

A. A. B.

6190/-

1⁷/₀₈

A. A. B.

R/Entries due to upgradation w.e.f 1-10-2007 pay Rs 5020/-
in BPS NO 7 on 30-9-2007 is fixed in Rs 5190/- in BNO 12
on 1-10-2007.

BPS NO 12 Rs 3630-260-11430

G/S Haryana.

5190/-

1¹⁰/₀₇

A. A. B.

5190/-

1¹²/₀₇

A. A. B.

S/Revised BPS NO 12 Rs 4355-310-13655

6215/-

1⁷/₀₈

A. A. B.

6525/-

1¹²/₀₈

A. A. B.

Attested

[Signature]

District Education Officer

6835/-

1¹²/₀₉

A. A. B.

7145/-

1¹²/₁₀

A. A. B.

13

Signature and
signature of
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in attesta
columns 1 t

Name of post

Whether substan-
tive or officiating
and whether
permanent or
temporary

If officiating
state
(i) substantive
appointment, or
(ii) whether
service counts
for pension
under Art. 311
C. S. R.

15 -
Pay in
substantive
post

Additional
Pay for
officiating

Filing
under the
term "Pay"

Date of
appointment

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. 311 C. S. R.	15 - Pay in substantive post	Additional Pay for officiating	Filing under the term "Pay"	Date of appointment
2128/-			$1\frac{12}{94}$	5215 5075/-		$1\frac{12}{5}$
2209/-			$1\frac{12}{95}$	5385/- BPS 7 Rs 2940.160-7740		$1\frac{12}{6}$
2290/-			$1\frac{12}{96}$	6140/-		$1\frac{12}{7}$
2371/-			$1\frac{12}{97}$	6300/-		$1\frac{12}{7}$
2452/-			$1\frac{12}{98}$	Allowed Upgradation BPS 12		
2533/-			$1\frac{12}{99}$	6490/-		$2\frac{12}{7}$
2614/-			$1\frac{12}{1000}$	Pay Scale Revised B 12 @ Rs 4355.310		
2695/-			$01\frac{12}{01}$	7765/-		$1\frac{12}{8}$
4020/-			$1\frac{12}{01}$	8075/-		$1\frac{12}{8}$
4140/-			$1\frac{12}{02}$	8385/-		$1\frac{12}{9}$
4260/-			$1\frac{12}{03}$	8695/-		$1\frac{12}{10}$
4380/-			$1\frac{12}{04}$	Pay Scale Rev BPS 12 Rs 7000.500.25000 14000/-		$1\frac{12}{11}$
5075/-			$1\frac{12}{05}$	Pay S/R BPS 7 Rs 2555-140-6255 17000 Rs 500/- P.P 14500/- 14500/- G.S. Sarda		$01\frac{12}{12}$

[Signature]
Dy. District Education Officer
(Male) for Ghazi

12

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 entry is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of Forms 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.
<i>[Signature]</i>	30/11/06 Inc.		<i>[Signature]</i>				
<i>[Signature]</i>	30/06/07 Pay Rev		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/07 Inc.		<i>[Signature]</i>				
<i>[Signature]</i>	31/12/07 Entry Rev		<i>[Signature]</i>				
<i>[Signature]</i>	30/06/08 Pay Rev		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/08 A/Inc.		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/09 A/Inc.		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/10 A/Inc.		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/11 Pay Rev		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/11 A/Inc.		<i>[Signature]</i>				
<i>[Signature]</i>	30/11/12 A/Inc.		<i>[Signature]</i>				

15

16

30/11/2009 30/11/2010
 30/11/2009 30/11/2010
 30/11/2009 30/11/2010

D.P.C (M)

30/11/2010 30/11/2014
 30/11/2010 30/11/2014
 30/11/2010 30/11/2014

D.P.C (M)

Lower
 7.12.11 to 30.11.2012
 Service verified
 to
 rolls & other
 in the ser

[Signature]

Attested

[Signature]

Dr. District Education Officer

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 servid. counts for pension under Art. 371 S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
<p><i>EPS</i> Shabon.</p>		<p><i>→</i> <i>Rs</i></p>	<p><i>14500/-</i> <i>15500/-</i></p>	<p><i>inv</i> <i>14500/- + 500/- =</i></p>	<p><i>15000/-</i></p>	<p><i>01/12/73</i></p>	<p><i>A. K. A. D.</i></p>
<p><i>Attested</i> <i>H. K. D.</i> District Education Officer (Male) Tor Gar</p>							

She Bad Bab PST G.P.S. Kander Tamare. option
I will not claim any benefit for the award of upgradation in the lower scale on 02.12.2007. I will not claim any benefit of arrears for the period was 01.10.2007 to 01.12.2007.

A. A.

[Signature]
Dy. District Education Officer

10
M. S. K. any or deduct by the

temporary for pension under Art. 371 C. S. R.

PST

Attest
Signature of the Officer in charge of the office

BPS No. 9 Scale Revised w.e.f 1/7/07 Rs. 2940-160-710

G.P.S. Kander Tamare. 5020/- 1-7/07

" 5180/- 1-12/07

6190/- 1-7/08

R/Entries due to upgradation w.e.f 1-10-2007 Pay Rs 5190/- in BPS No 7 on 30-9-2007 fixed in Rs 5190/- in BPS No 7 on 1-10-2007

BPS No 12 Rs 3830-260-11430

G.P.S. Haryana 5190/- 1-10/07

" 5190/- 1-12/07

s/Revised BPS No 12 Rs 4355-310-13655

6215/- 1-7/08

6525/- 1-12/08

6835/- 1-12/09

7145/- 1-12/10

[Signature]
Dy. District Education Officer
(Male) for Chair

[Signatures]
Attest

UNDERTAKING

Mr. Sher Badshah S/O Sar Nawaz Khan GGPS
Kander Tawara is hereby given an undertaking to the effect that if
 any overpayment is made to as a result of incorrect fixation up gradation of scale
 reduction will be made from my pay/pension/gratuity later on at any stage as may fixed
 by the Government. Department attested

Attest: [Signature]
 Dy. District Officer
 (Male) P. Manshra

Signature: [Signature]

any
 payment
 or
 dis-
 cement

Period	Government to which debit-able
30/07 Inc	Sanctioned E/leave vide BDO S/L Manshra vide No. 379-81 dated 11-1-2008 W.E.F 01-12-2007 to 30-11-2008 365 days on Half Pay.
30/08 s/kausal	
30/07 Inc not due	
30/08 s/kausal	
30/11/08 Inc	ADJUSTMENT ON RETURN FROM LEAVE AND UNAVAILED PORTION.
30/09 Inc	Adjustment on return from leave * w.e.f 20/9/08 at G/S Kander Tawara vide DOR, S/L under Endst. No. 8005-5 dated 1/5/2008 unavailed portion of leave with effect from 20/4/08 to 30/11/08 is hereby cancelled.
30/11/10 Inc	
30/11 s/R	

[Signature]
 Dy. District Officer
 (Male) P. Manshra

[Signature]
 Dy. District Education Officer
 (Male) Tar Char

(8)

10	11	12	13	14	15	16	17
No. and name of the office existing station 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	Natural duration of leave taken	Allocation of period of leave on which pay upto four months for which leave salary is admissible to another Government Period Government to which admissible	Signature of the head of the office or other attesting officer	Reference to any record of punishment or award or points of the Government servant
Officer Edu: Torghar	30/11/66	Promoted to U.S. Edu: Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government
Officer Edu: Torghar	30/12/66	Promoted to Dy SDO (M) Torghar	<i>[Signature]</i>			<i>[Signature]</i>	Service verified for the period 01.01.66 to 30.11.66 from records of the Government

Allowed due to upgradation of scale BPS No 09 to BPS No 12 in the light of notification vide EDO (EIS) Edn, Mansabura under Endst. No 18485-634729/08

Sanction left adcom authority vide No 48000 vide DO (M) EIS Mansabura Endst No 13664-66 dt 19/5/68

Service verified up to 12/07/66 from Acq. Roll's & other office records

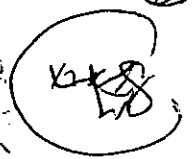
[Signature]
 Dy. District Education Officer
 Mansabura

7

Signature and name of the officer or the Attesting officer of the station of the Government	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Nature and duration of leave taken	13 Leave (Allocation of principal or average pay for the period for which the leave is admissible to other Government servants)	14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government servant.
<p>Phan</p> <p>Phan</p>	<p>9/2/2014</p> <p>REd to m Services</p>		<p>Phan</p> <p>Phan</p>		<p>The competent authority is pleased to impose minor penalty of "with held two increments" of his absence period vide DEO(m) (under Endort no. 1518-21 dated 7/1/2014. w.e.f 1-9-2013 to 31-12-2013. The increment falling on 2012 & 2013 stopped with accumulative effect.</p> <p>SDEO (M) Tor Ghar</p> <p>1098-1263</p> <p>15/1/2014 17/2/2014</p> <p>Pay actua for 1/2014</p> <p>18/2</p>		
<p><u>Note</u></p> <p>Final payment of Rs=196386/- allowed vide Authority hearing No. 14-15/513 dated 13/1/2014</p> <p>Drawn Rs. 196386/- less</p> <p>Zakat Rs. 4910/- Nil Rs. 191476/-</p> <p>ind S. No. 722 dt. 20.12.2014</p> <p>as final payment</p> <p>Dr. D.A.P.</p> <p>Dr. District Education Officer (Mal) Tor Ghar</p>					<p>18</p> <p>1.12.2012 30.11.2013</p> <p>19</p> <p>1.12.2013 31.8.2014</p> <p>Retirement Order</p> <p>The competent authority E+S.E Toghav is pleased to premaritirement order in v/o Sher Badshah P.S. G.P.S. Shaloon Base Khail w.e.f 1.9.2014. & Entitled for the grant of Encashment in lieu of 165 days L.P.R vide DEO (M) Idgar No 3394-97 9/10 9.2014.</p> <p>S.No 571</p> <p>78870</p> <p>16 days</p> <p>21/9 -</p>	<p>SDEO (M) Tor Ghar</p> <p>SDEO (M) Tor Ghar</p>	



Handwritten notes: "KPK Peshawar" and other illegible scribbles.



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA.

No. 288 /F.No.162/Vol:14/Appeal of
PST(M)General.
Dated Peshawar the 2/11 /2018.

10.

The District Education Officer (M)
Torghar.

Handwritten notes: "ADEO (E/P)", "2603/18", and "15/11/2018".

Subject:- DEPARTMENTAL APPEAL.

Memo:-

I am directed to refer to your letter No.5275 dated 30.07.2018 on the subject cited above and to state that the appeal of Mr. Sher Badshah Torghar in light of DEO(M)Torghar report is hereby rejected.

I am further directed to ask you to inform the teacher concerned accordingly.

Handwritten signature of Deputy Director (Establishment) Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar. Date: 1/11/18.

Endst: No. _____ /

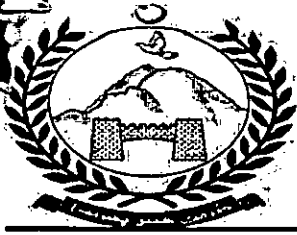
Copy forwarded to the:-

- 1. P.A to Director Elementary and Secondary Education local office.

Deputy Director (Establishment) Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.



Handwritten signature and notes at the bottom of the page.



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT TOR GHAR**

No. 5275 Dated 30/07/2018.

To,


The Assistant Director Estab: E&SE Khyber Pakhtunkhwa
Peshawar.

Subject: DEPARTMENTAL APPEAL

I am to refer to your letter No.2850/F.No.162/ Vol -14/Appeal of PST (M) General dated 14-03-2018, on the subject captioned above and to submit the detail report views/comments regarding subject as follow.

1. That the applicant has been performing his duty as (PST) Primary School Teacher at GPS Shaloon District Tor Ghar and was retired on 01.09.2014
2. That he was proceeded on account of his willful and un- authorized absence from his duty by the then DEO Male Tor Ghar.
3. That, show cause notice was issued and he submitted his reply accordingly and on finality of disciplinary proceedings, minor penalty of **withheld two increments 2012-13 with accumulative effect** was imposed upon him by the then DEO Male Tor Ghar vide Notification No.1518-21 dated 07.01.2014 with the remarks that his intervening period w.e.f 01.09.2012 to 31.12.2013 shall be decided later on, keeping in view his future performance.
(Copy of said Notification attached)
4. That the aforesaid Notification regarding imposition of minor penalty against the applicant was passed by the then DEO Male Tor Ghar, way back in the year 2014.

Now the applicant has approached to your good self for review as appellate authority against the aforesaid penalty imposed upon him, submitted for further process please.


District Education Officer (M)
E&SE Tor Ghar

Endst: NO 5276-79 Dated 30/7 /2018
Copy For information to the.

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Assistant District Education Officer Litigation Local Office.
3. Applicant concerned.
4. Office file