

BEFORE THE KHYBER PAKHTUKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. 888 / 2023

Khyber Pakhtunkhwa
Service Tribunal

E. No. 11028

7/2/24
Govt. of KP etc

Faridoon Khan

Versus

=====

INDEX

S.No	Particulars of Due	Dates	Pages
1	Memo of Application	-	1
2	Notification	30-06-2015	2-3
3	Office Order	21-12-2018	4-6
4	Copy of Service Book		7-8

Dated: 29th January, 2024


Muhammad Zafar Khan (Tahirkheli)
ASC

87, Al-Falah Street,
Peshawar Cantt
Tel: 0300-9597670

①

BEFORE THE KHYBER PAKHTUKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. 888 / 2023

Faridoon Khan

Versus

Govt. of KP etc

=====

APPLICATION FOR SUBMISSION OF ADDITIONAL DOCUMENTS

RESPECTFULLY SHEWETH;

1. The above titled appeal is pending before this Hon'ble Court and is fixed for today, 21-05-2024.
2. That for the just conclusion of the matter in question certain documents are required to be placed on record, detailed as under;
 - i. Notification dated 30-06-2015.
 - ii. Office order dated 21-12-2018.
 - iii. Copy of service book.

In view of the above, it is requested that the additional documents may kindly be placed on record for the adjudication of the matter in question on merits.

Peshawar, dated
29th January, 2024

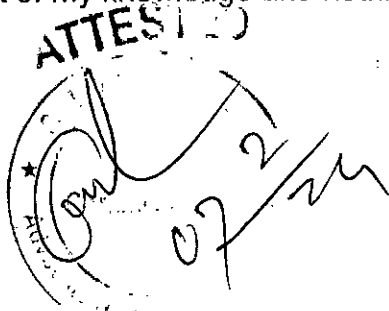
Through:


Petitioner

Muhammad Zafar Khan (Tahirkheli)
ASC

Affidavit:

I, Faridoon Khan s/o Haji Shamshad Khan, Work Munshi, Highway Division, Communication & Works Department, Khyber Pakhtunkhwa Peshawar, the Petitioner, do hereby solemnly affirm and declare on Oath that contents of this application are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Tribunal.

ATTEST

07/2/24


Deponent



(2)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)**

Dated Peshawar, the 30-06-2015

NOTIFICATION

NO.FD/SO(FR)7-20/2015 The competent authority has been pleased to accord approval to the upgradation of pay scales of the following provincial government employees with effect from 01-07-2015:

- a) Two pay scale upgradation will be allowed to all provincial government employees from BS-01 to BS-05.
 - b) One pay scale upgradation will be allowed to all provincial government employees from BS-06 to BS-15
 - c) Special Compensatory Allowance equal to difference of notional upgradation of BS-16 to BS-17 will be allowed to all provincial government employees in BS-16 in lieu of upgradation.
 - d) Upgradation will be applicable to both pay and allowances with freezing limits and other conditions currently in vogue unless revised by the government.
 - e) Pay fixation on upgradation will be applicable w.e.f. 01-07-2015 or 01-12-2015 on the option to be given by the concerned employee.
 - f) All provincial government employees who have been upgraded en-block or individually in last five years starting from 01-07-2010 or have been granted special allowance / pay equal to 40 % or more of their normal pay shall not be entitled for the instant upgradation.
2. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.
 3. All the concerned Departments will amend their respective service rules to the same effect in the prescribed manner.
 4. The above upgradation scheme shall not be applicable to employees of Autonomous Bodies, Semi Autonomous Bodies and Public Sector Companies.
 5. Explanatory note and subsidiary instructions on the subject will be issued separately.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

PTD

TRUE COPY

Encl No. & Date even.

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

- 1) PS to Additional Chief Secretary, FATA.
- 2) All Administrative Secretaries Government of Khyber Pakhtunkhwa.
- 3) Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
- 4) Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 5) Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
- 6) Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 7) Secretary Provincial Assembly, Khyber Pakhtunkhwa.
- 8) All Heads of Attached Departments in Khyber Pakhtunkhwa.
- 9) Registrar, Peshawar High Court, Peshawar.
- 10) All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.
- 11) Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
- 12) Registrar, Service Tribunal Khyber Pakhtunkhwa.
- 13) Secretary to Govt. of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
- 14) The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan.
- 15) The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Manshera and Dir Lower.
- 16) The Treasury Officer, Peshawar.
- 17) All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
- 18) PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
- 19) PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 20) Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
- 21) PS to Finance Secretary.
- 22) PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department.
- 23) All Section Officers/Budget Officers in Finance Department.
- 24) Mr. Jabir Hussain Bangash, President, Class-IV Association, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 25) Mr. Manzoor Khan, President, Civil Secretariat Driver Association Khyber Pakhtunkhwa, Peshawar.
- 26) Mr. Akbar Khan Mohmand, Provincial President, Class-IV Association, Khyber Pakhtunkhwa, Peshawar.

(MURAD AHMED)
SECTION OFFICER (FR)

TRUE COPY

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 177-EI/631/CEC/C&WD

Dated Peshawar the 2nd 12/2018

OFFICE ORDER

On the recommendations of Departmental Promotion Committee in its meeting held on 14/12/2018, the following Dartries/ Record Lifters/ Naib Qasids/ Chowkidars (having passed Secondary School Examination under 15-Years of Age) have been cleared for promotion to the post of Junior Clerks (BS-11) in C&W Department on regular basis with immediate effect:-

1)	Mr. Muhammad Naeem (N/Qasid)	As Junior Clerk On Regular basis
2)	Mr. Muhammad Faisal (N/Qasid)	As Junior Clerk On Regular basis
3)	Mr. Muhammad Ibrar Hussain (N/Qasid)	As Junior Clerk On Regular basis
4)	Mr. Aman Ullah (Chowkidar)	As Junior Clerk On Regular basis
5)	Mr. Anwar Shahid Khan (Daftari)	As Junior Clerk On Regular basis
6)	Mr. Muhammad Ihsan (N/Qasid)	As Junior Clerk On Regular basis
7)	Mr. Muhammad Adil (Chowkidar)	As Junior Clerk On Regular basis
8)	Syed Zulfiqar Hussain (N/Qasid)	As Junior Clerk On Regular basis
9)	Mr. Saleem Ullah (N/Qasid)	As Junior Clerk On Regular basis
10)	Mr. Lal Rehman (N/Qasid)	As Junior Clerk On Regular basis
11)	Mr. Ghulam Mustafa (Naib Qasid)	As Junior Clerk On Regular basis
12)	Mr. Waseem Shah Nawaz (N/Qasid)	As Junior Clerk On Regular basis
13)	Mr. Abdur Rehman (N/Qasid)	As Junior Clerk On Regular basis
14)	Mr. Intikhab Hussain (Chowkidar)	As Junior Clerk On Regular basis
15)	Mr. Saeed Ullah Shah (N/Qasid)	As Junior Clerk On Regular basis
16)	Mr. Inamullah Khan (Chowkidar)	As Junior Clerk On Regular basis
17)	Mr. Dilawar Khan (Chowkidar)	As Junior Clerk On Regular basis
18)	Mr. Niaz Ali Khan (Chowkidar)	As Junior Clerk On Regular basis
19)	Mr. Farnan Ullah (Chowkidar)	As Junior Clerk On Regular basis
20)	Mr. Amir Nawaz (Chowkidar)	As Junior Clerk On Regular basis
21)	Mr. Nazir Muhammad (Chowkidar)	As Junior Clerk On Regular basis
22)	Mr. Hameed Ullah (N/Qasid)	As Junior Clerk On Regular basis
23)	Mr. Shakir Ullah (Chowkidar)	As Junior Clerk On Regular basis
24)	Mr. Asif Melirhood (N/Qasid)	As Junior Clerk On Regular basis
25)	Mr. Muhammad Noman (N/Qasid)	As Junior Clerk On Regular basis
26)	Mr. Muhammad Tariq (N/Qasid)	As Junior Clerk On Regular basis
27)	Mr. Inamullah (N/Qasid)	As Junior Clerk On Regular basis
28)	Mr. Rafeel Ahmad (N/Qasid)	As Junior Clerk On Regular basis
29)	Mr. Arif Khan (Daftari)	As Junior Clerk On Regular basis
30)	Mr. Nazim Hussain (N/Qasid)	As Junior Clerk On Regular basis
31)	Mr. Muhammad Arif (N/Qasid)	As Junior Clerk On Regular basis
32)	Mr. Mustafa Kamal Khan (N/Qasid)	As Junior Clerk On Regular basis
33)	Mr. Arif Khan (Chowkidar)	As Junior Clerk On Regular basis
34)	Mr. Ashfaq Ahmad (Chowkidar)	As Junior Clerk On Regular basis
35)	Mr. Sajjadullah (Chowkidar)	As Junior Clerk On Regular basis
36)	Mr. Matiullah Shah (N/Qasid)	As Junior Clerk On Regular basis
37)	Mr. Muhammad Junaid Abid (Naib Qasid)	As Junior Clerk On Regular basis
38)	Mr. Qarib Ali-Haidri (N/Qasid)	As Junior Clerk On Regular basis
39)	Mr. Shafiq Hussain (Naib Qasid)	As Junior Clerk On Regular basis
40)	Mr. Muhammad Alam (Chowkidar)	As Junior Clerk On Regular basis

2- On their Regular Promotion as Junior Clerks, they will be on probation for a period of one year in terms of Section-6(2) of Civil Servant Act, 1973 read with Rules-15(1) of the Civil Servants (Appointment, Promotion & Transfer) Rules, 1909.

3- Consequent upon above promotions, the posting/transfer of the following officials of C&W Department is hereby ordered, in the public interest with immediate effect:-

Sl No.	Name of officials	Existing posting	Proposed for actualization/Adjustment	Remarks
1)	Mr. Muhammad Naeem Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division Dikhan	Junior Clerk O/O SE C&W Circle-Bannu	Existing Vacancy
2)	Mr. Muhammad Faisal Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Manshehra	Junior Clerk O/O XEN C&W Division Manshehra	Existing Vacancy
3)	Mr. Muhammad Ibrar Hussain Junior Clerk (BS-11)	Naib Qasid O/O XEN H/Way Division Tribal District Khyber	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
4)	Mr. Aman Ullah Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division Tribal District Bajaur	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
5)	Mr. Anwar Shahid Khan Junior Clerk (BS-11)	Daftari O/O XEN C&W Division Dir Lower	Junior Clerk O/O XEN C&W Division Dir Upper	Existing Vacancy

TRUE COPY

Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
Mr. Muhammad Ihsan Junior Clerk (BS-11)	Naib Qasid O/O XEN PBMC Peshawar	Junior Clerk O/O CE (Centre) C&WD Peshawar	Existing Vacancy
7) Mr. Muhammad Adil Junior Clerk (BS-11)	Chowkidar O/O XEN PBMC Peshawar	Junior Clerk O/O XEN C&W Division Kohat	Existing Vacancy
8) Syed Zulfqar Hussain Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division Tribal District Kurram	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
9) Mr. Saleem Ullah Junior Clerk (BS-11)	Naib Qasid O/O XEN H/Way Division Tribal District SW Tank	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
10) Mr. Lal Rehman Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Karak	Junior Clerk O/O XEN C&W Division Karak	Existing Vacancy
11) Mr. Ghulam Mustafa Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Mansehra	Junior Clerk O/O XEN C&W Division Baltagram	Existing Vacancy
12) Mr. Waseem Shah Nawaz Junior Clerk (BS-11)	Naib Qasid O/O CE (East) C&WD Abbottabad	Junior Clerk O/O CE (East) C&WD Abbottabad	Existing Vacancy
13) Mr. Abdur Rehman Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Dir Lower	Junior Clerk O/O XEN C&W Division Dir Upper	Existing Vacancy
14) Mr. Inikhab Hussain Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division Tribal District Kurram	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
15) Mr. Saeed Ullah Shah Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Bannu	Junior Clerk O/O XEN C&W Division Bannu	Existing Vacancy
16) Mr. Inamullah Khan Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Tribal District Bannu/Lakki	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
17) Mr. Dilwar Khan Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Tribal District Orakzai at Hangu	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
18) Mr. Niaz Ali Khan Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division-I Peshawar	Junior Clerk O/O SE C&W Circle Kohat	Existing Vacancy
19) Mr. Faqar Ullah Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division-II Peshawar	Junior Clerk O/O SE C&W Circle Dir Lower	Existing Vacancy
20) Mr. Amir Nawaz Junior Clerk (BS-11)	Chowkidar O/O XEN PBMC Peshawar	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
21) Mr. Nazir Muhammad Junior Clerk (BS-11)	Chowkidar O/O XEN PBMC Peshawar	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
22) Mr. Hameed Ullah Junior Clerk (BS-11)	Naib Qasid O/O XEN H/Way Division Tribal District Khyber	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
23) Mr. Shakir Ullah Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division Tribal District Bajaur	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
24) Mr. Asif Mehmood Junior Clerk (BS-11)	Naib Qasid O/O XEN Tribal District Darazanda/Jandola at Dikhan	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
25) Mr. Muhammad Noman Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle Peshawar	Junior Clerk O/O CE (Centre) C&WD Peshawar	Existing Vacancy
26) Mr. Muhammad Tariq Junior Clerk (BS-11)	Naib Qasid O/O XEN PBMC Peshawar	Junior Clerk O/O XEN C&W Division Malakand	Existing Vacancy
27) Mr. Inamullah Junior Clerk (BS-11)	Naib Qasid O/O XEN PBMC Peshawar	Junior Clerk O/O XEN H/Way Division Swat	Existing Vacancy
28) Mr. Raheel Ahmad Junior Clerk (BS-11)	Naib Qasid O/O ARO RR&MTL Abbottabad	Junior Clerk O/O XEN C&W Division Abbottabad	Existing Vacancy
29) Mr. Arif Khan Junior Clerk (BS-11)	Daftari O/O XEN C&W Division Haripur	Junior Clerk O/O XEN C&W Division Haripur	Existing Vacancy
30) Mr. Nazim Hussain Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Mansehra	Junior Clerk O/O XEN C&W Division Kohistan	Existing Vacancy
31) Mr. Muhammad Arif Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Hangu	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
32) Mr. Mustafa Kamal Khan Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Bannu	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
33) Mr. Arif Khan Junior Clerk (BS-11)	Chowkidar O/O CE (CDO) C&WD Peshawar	Junior Clerk O/O CE (CDO) C&WD Peshawar	Existing Vacancy

Vacancy

TRUE COPY

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
34)	Mr. Ashfaq Ahmad Junior Clerk (BS-11)	Chowkidar O/O CE (CDO) C&W Peshawar	Junior Clerk O/O XEN C&W Division Shangla	Existing Vacancy
35)	Mr. Sajjadullah Junior Clerk (BS-11)	Chowkidar O/O XEN PBMC Peshawar	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
36)	Mr. Maliullah Shah Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Peshawar	Junior Clerk O/O XEN C&W Division Malakand	Existing Vacancy
37)	Mr. Muhammad Junaid Abid Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Peshawar	Junior Clerk O/O XEN C&W Division Haripur	Existing Vacancy
38)	Mr. Qarib Ali Haidri Junior Clerk (BS-11)	Naib Qasid O/O CE (CDO) C&WD Peshawar	Junior Clerk O/O services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
39)	Mr. Shafiq Hussain Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Tribal District Kurram	Junior Clerk services placed at the disposal of CE (Merged Area) W&SD Peshawar	Existing Vacancy
40)	Mr. Muhammad Alam Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Swabi	Junior Clerk O/O XEN Building Division Swat	Existing Vacancy

CHIEF ENGINEER (CENTRE)

Copy is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar
- 2- Chief Engineer (North/ CDO) C&W Department, Peshawar
- 3- Chief Engineer (East) C&W Department, Abbottabad
- 4- Chief Engineer (FATA) W&S Department, Peshawar
- 5- All Superintending Engineers C&W Circle (concerned)
- 6- All Executive Engineer C&W Division (concerned)
- 7- All District Accounts Officers (concerned)
- 8- Officials concerned

CHIEF ENGINEER (CENTRE)

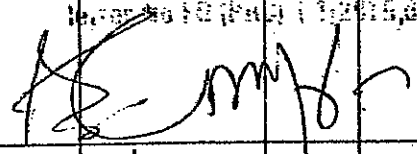
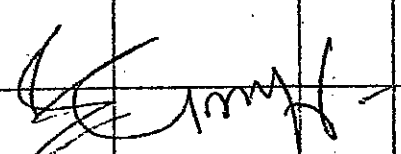
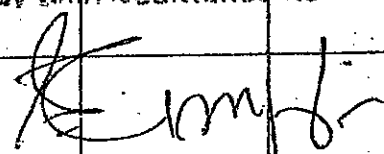
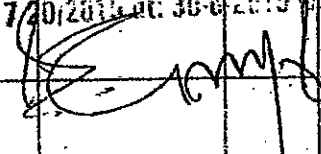
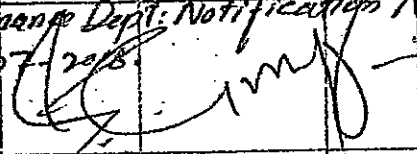
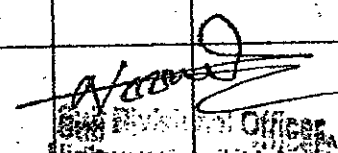
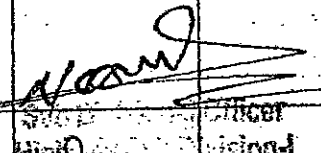
TRUE COPY

7

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 temporary under Art. 375 C. B. R.	Pay in substantive post	Additional pay for officiating	Other benefits falling under the same pay	Date of payment	Signature of Government servant
work munshi BP3-05	Revised @ 2015			11745			
(6985-340-17185)		Rs. 12085/p.m				01/12/2015	
11		Rs. 12425/p.m		12085		01/12/2015	
UP-Graded to BP3-07							
(7490-415-19940)		Rs. 12885/p.m				01/12/2015	
80075	Revised @ 2016						
(9220-510-24520)		Rs. 15850/p.m				01/7/2016	
14080	7/11			11745			
7/11							
7/11							
7/11							
14080							
7/11							
7/11							
7/11							
7/11							

TRUE COPY

8

9	10	11	12	13		14	15
			Leave				
Signature and position of the head of 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	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	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which debitable		
				Pay Fixed in the Revised Pay Scale No. 05 and Pay Fixed Rs. 12085 P.M. vide Finance Dept. Notification No. FD(S O) (PR) 17/07/2015 dt. 17-07-2015			
				 Sub-Divisional Officer Highway Division-I Peshawar			
				Granted Annual Increment service from 01-12-2014 to 30-11-15 vide office copy of Pay bill/Accountance Rolls			
				 Sub-Divisional Officer Highway Division-I Peshawar		 Sub-Divisional Officer Highway Division-I Peshawar	
				Granted up-gradation from B.P.S. 05 to B.P.S. 07 vide finance dept. (Pay Dept. Notification No. FD(S O) (PR) 17/07/2015 dt. 30-07-2015 vide. 01-07-2015)			
				 Sub-Divisional Officer Highway Division-I Peshawar			
				Pay fixed in the Revised Pay Scale No. (07) and Pay Fixed Rs. 15850 P.M. w.e.f 01-7-2016 vide Finance Dept. Notification No. FD(PRC)01/01/2016 dt. 19-07-2016.			
				 Sub-Divisional Officer Highway Division-I Peshawar			
				Granted Annual Increment service from 01-12-2015 to 30-11-2016 vide office copy of Pay bill/Accountance Rolls			
				 Sub-Divisional Officer Highway Division-I Peshawar		 Sub-Divisional Officer Highway Division-I Peshawar	

TRUE COPY