

A. No. 67/2016  
Rehmat wali vs Govt

02.11.2017

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Faiz Muhammad Litigation Assistant and Zakiullah, Senior Auditor for the respondents present. They jointly stated at the bar that the entry challenged by the appellant has been corrected in his service book and it would be corrected in the Accounts Office as well as.

In view of the above, this appeal is disposed off. Parties are left to bear their own costs. File be consigned to the record room.

  
Member

  
Chairman

ANNOUNCED

02.11.2017

20.06.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant requested for adjourned. Adjourned. To come up for arguments on 04.10.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Gul Zeb Khan)  
Member

04.10.2017

Learned counsel for appellant present. Learned District Attorney for respondents present. At the request of both the learned counsel for appellant and learned District Attorney. Respondent No. 3 is directed to appear the person before the Court in order to render assistance. Summons be issued accordingly. Adjourn. To come up for arguments on 02.11.2017 before D.B.

  
Member  
(Executive)

  
Member  
(Judicial)

15.12.2016

Counsel for the appellant and Addl. AG present. Written reply not submitted. Written reply not submitted despite repeated opportunities including last opportunity which was further extended subject to payment of cost of Rs. 1000/-. No further chance is granted to the respondents for submission of written reply. The appeal is assigned to D.B for final hearing for 15.03.2017.

  
Chairman

15.03.2017

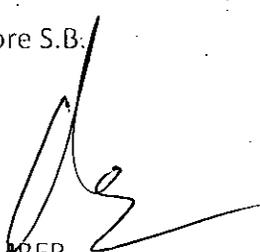
Appellant in person and Addl. AG alongwith Mr. Zakiullah, Senior Auditor for respondents present. Rejoinder not submitted. Requested for time to file rejoinder. To come up for rejoinder and final hearing on 20.06.2017 before D.B.

  
(ASHFAQUE TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

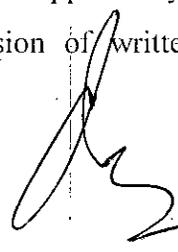
09.06.2016

Appellant in person, M/S Maaz Madni, Assistant Litigation Officer and Ansar Ahmed, AAO alongwith Addl: AG for respondents present. Written reply not submitted and requested for further time. To come up for written reply/comments on 22.08.2016 before S.B.

  
MEMBER

22.08.2016

Appellant in person and Mr. Zakiullah, Senior Auditor alongwith Additional AG for the respondents present. Written reply on behalf of respondent No. 4 submitted while learned Additional AG made request for adjournment on behalf of respondents No. 1 to 3. Last opportunity granted to respondents No. 1 to 3 for submission of written reply/comments for 24.10.2016 before S.B.

  
Member

24.10.2016

Clerk to counsel for the appellant and Addl. AG for respondents present. Written reply not submitted despite last opportunities. Requested for further adjournment. Last opportunity is further extended subject to payment of cost of Rs. 1000/- which shall be borne by respondents from their own pockets. To come up for written reply/comments on 15.12.2016 before S.B.

  
Chairman

10.02.2016

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was initially appointed as Bishti vide order dated 31.3.1977 and was promoted as Ward Orderly (BPS-2) in the year 1984. That his nomenclature was wrongly written as Warder Orderly/Dai in his service book in the year 1987 and that after gaining knowledge the appellant preferred departmental appeal dated 8.9.2015 which was not responded and hence the instant service appeal on 19.1.2016.

That the said entries showing the appellant as Dai would adversely affect the pensionary benefits and other perks and privileges attached to the post of Ward Orderly.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.4.2016 before S.B.

Chairman

26.4.2016

Appellant Deposited  
Security & Process Fee

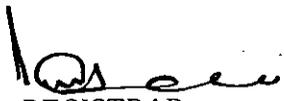
Appellant in person present. Security and process fee not deposited. The same be deposited within a week whereafter notices be issued to the respondents. To come up for written reply/comments on 09.06.2016 before S.B.

Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. \_\_\_\_\_ 67 /2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19.01.2016	<p>The appeal of Mr. Rehmat Wali resubmitted today by Mr. Jahangir Khan Afridi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>20-2-16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2		

The appeal of Mr. Rahmat Wali son of Amir Wali Khan Ward Orderly received to-day i.e. on 06.01.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copies of extract from service book mentioned in para-8 of the memo of appeal are not attached with the appeal which may be placed on it.

No. 36 /S.T,

Dt. 7/1 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Jahangir Khan Afidi Adv. Pesh.

*Re Submitted after  
completion*  
  
19/1/2016

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

Service Appeal No. 67/2016

Rehmat Wali .....(Appellant)

**VERSUS**

Secretary Social Sector Department FATA, FATA Secretariat,  
Warsak Road, Peshawar and others.....(Respondents)

**I N D E X**

<b>S.No</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses,of the parties		7
4.	Copy of Notification	A	8
5.	Copy of Revised pay scale and move-over order dated 03/02/1994	B & B-1	9-10
6.	Copy of alteration letter	C	11
7.	Copy of monthly salary	D	12
8.	Copy of Service Book	E	13-34
9.	Copy of departmental appeal	F	35-38
10.	Wakalat Nama		39

  
Appellant

Through

Dated: 04/01/2016

  
**Jahangir Khan Afridi**  
Advocate High Court,  
Peshawar.  
Cell No. 0300-5855764

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

Service Appeal No. 67 /2016

N.W.F. Province  
Service Tribunal  
Diary No. 16  
Dated 06-1-2016

Rehmat Wali S/o Amir Wali Khan Ward Orderly, Civil  
Dispensary Inayat Killi (Bajaur Agency).....(Appellant)

**VERSUS**

1. Secretary Social Sector Department FATA, FATA Secretariat,  
Warsak Road, Peshawar.
2. Director Health Services FATA, FATA Secretariat Warsak  
Road, Peshawar.
3. Agency Surgeon, Bajaur Agency at Khar.
4. Accountant General Khyber Pakhtunkhwa, A.G. Office,  
Peshawar.....(Respondents)

**APPEAL U/S 4 OF THE N.W.F.P (KHYBER**  
**PAKHTUNKHWA) SERVICE TRIBUNAL ACT 1974**  
**FOR INCORPORATING THE CORRECT ENTRY AS**  
**WARD ARDLE IN THE SERVICE RECORD OF THE**  
**APPELLANT INSTEAD OF DAI, FOR WHICH**  
**DEPARTMENTAL APPEAL OF THE APPELLANT**  
**HAS NOT BEEN RESPONDED DESPITE THE**  
**LAPSE OF STATUTORY PERIOD.**

**Prayer:**

*On acceptance of instant Service Appeal,  
subsequent entry of appellant in the service record as  
Dai being illegal may be set aside with the direction  
to incorporate correct entry as Ward Orderly in  
service record of the appellant.*

Re-submitted to-409  
and filed;

19/1/16

**Respectfully Sheweth:**

Brief facts giving rise to the instant appeal are as under:

**FACTS:**

1. That the appellant belongs to a respectable family of village Inayat Killi, Bajaur Agency.
2. That the appellant is at presently serving under Directorate of Health (FATA).
3. That the appellant was initially enlisted as Bhishti in the time scale of pay vide Notification No. 250-251/C.S. dated 31/03/1977 in a vacant post in Civil Dispensary Inayat Killi (Bajaur Agency). (Copy of Notification is attached herewith as annexure "A").
4. That the appellant Grade has changed from Bhishti to Ward Orderly while preparing his Revised Pay Scale in the year of 1991. (Copy of Revised pay scale is attached herewith as annexure "B" & "B/1").
5. That the service of the appellant has already been regularized in accordance with law. But no increment was given to the appellant from last 5 years.

6. That the appellant has now come to know that the department concerned has changed his designation from Ward Ardle to some-what not known designation i.e. Dai. (Copy of alteration letter is attached as "C").
7. That the appellant is at presently serving as Ward Orderly in BPS-5, for which the copy of monthly salary is also attached herewith for perusal please as annexure "D".
8. That unnecessary change/ alteration was made in the Service Book of the petitioner by the respondents intentionally and deliberately. (Copy of Service Book is attached as annexure "E").
9. That the appellant feels that at the time of his retirement to Pension Establishment, his legal rights, such like enlistment of his children on the basis of quota allotted for the purpose in accordance with laws, would be infringed/ bulldozed of by department concerned due to alteration.

10. That being aggrieved the appellant preferred Departmental Appeal before respondent No. 2 which has not been responded so far despite laps of statutory period. (Copy of departmental appeal is attached as annexure "F").
11. That being aggrieved the appellant prefers this appeal on the following grounds amongst others inter-alia:

**GROUND:**

- A. That the impugned omissions and commissions are arbitrary, mechanical and without the application of judicial mind and passed in vacuum needs interference of this Hon'ble Tribunal.
- B. That Constitution of Islamic Republic of Pakistan, 1973 also give guarantee to all the Citizens of Pakistan shall be treated according to law.
- C. That the appellant is innocent and the act of the respondents is not in accordance with the Service Rules and the law laid down for the purpose.

- D. That the impugned alteration has been made without the consent of the appellant which would badly affect the interest and rights of the appellant.
- E. That the appellant has about 39 years of service with unblemished service record.
- F. That any other grounds will argue at time of hearing with the kind permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of instant Service Appeal, subsequent entry of appellant in the service record as Dai being illegal may be set aside with the direction to incorporate correct entry as Ward Orderly.

OR

Any other relief which this august Tribunal deems appropriate may kindly be awarded to meet the ends of justice.

  
Appellant

Through

Dated: 04/01/2016

  
**Jahangir Khan Afridi**  
Advocate High Court,  
Peshawar.

16)

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

Service Appeal No. \_\_\_\_/2016

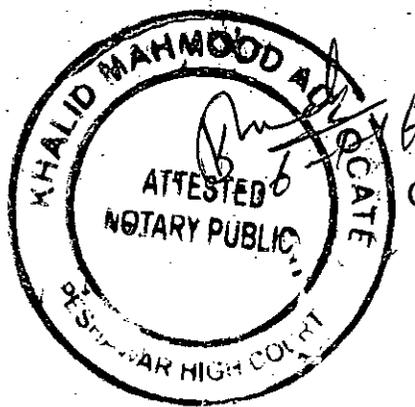
Rehmat Wali.....(Appellant)

**VERSUS**

Secretary Social Sector Department FATA, FATA Secretariat,  
Warsak Road, Peshawar and others.....(Respondents)

**AFFIDAVIT**

I, Rehmat Wali S/o Amir Wali Khan Ward Orderly, Civil  
Dispensary Inayat Killi (Bajaur Agency), do hereby solemnly  
affirm and declare, that all the contents of accompanying  
Service Appeal are true and correct to the best of my  
knowledge and belief and nothing has been kept concealed  
from this Hon'ble Tribunal.



*Rehmat Wali*  
**DEPONENT**  
CNIC: 21103-2305337-1

(7)

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

Service Appeal No. \_\_\_\_/2016

Rehmat Wali.....(Appellant)

**VERSUS**

Secretary Social Sector Department FATA, FATA Secretariat,  
Warsak Road, Peshawar and others.....(Respondents)

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Rehmat Wai S/o Amir Wali Khan Ward Orderly, Civil  
Dispensary Inayat Killi (Bajaur Agency)

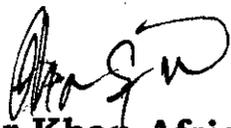
**RESPONDENTS:**

1. Secretary Social Sector Department FATA, FATA Secretariat,  
Warsak Road, Peshawar.
2. Director Health Services FATA, FATA Secretariat Warsak  
Road, Peshawar.
3. Agency Surgeon, Bajaur Agency at Khar.
4. Accountant General Khyber Pakhtunkhwa, A.G. Office,  
Peshawar.

  
Appellant

Through

Dated: 04/01/2016

  
**Jahangir Khan Afridi**  
Advocate High Court,  
Peshawar.

(8)

Ann-A

OFFICE OF THE AGENCY SURGEON BAJAUR AT KHAR.

OFFICE ORDER.

M. Rahmat Wali Khan Son of Amir Wali Khan Village Inayat Gilli Bajaur Agency is hereby appointed as Behishti against the Vacant post in the time Scale of Rs 100-2-116/3-110 plus other allowances admissible under the Rules and posted against the vacant post of Civil Dispensary Inayat Gilli (Bajaur Agency)

The post offered to him is sanctioned temporarily on year to year basis.

In case he wishes to resign at any time he will have to give a prior Notice and he will continue to serve the Government till his resignation is accepted.

He will be governed by such rules and orders relating to his pay leave T.A. Medical Attendance etc as may be issued by the Government for the category of Government Servants to which he belongs.

His appointment will be subject to his medical fitness, satisfactory character report and production of domiciled certificate. If he accepts the offer on the above terms and conditions he should report to the Compounder Incharge Civil Dispensary Inayat Gilli for duty, failing which this offer will be treated as cancelled and withdrawn.

AGENCY SURGEON BAJAUR AT KHAR.

NO 250 511 C-5 Dated 31/05/1977.

Copy for order to the:-

1. The Compounder Incharge Civil Dispensary Inayat Gilli for information with the remarks that he should submit the arrival report of the above named individual to this office in due course.
2. M. Rahmat Wali Khan Son of Amir Wali Khan Village Inayat Gilli Bajaur Agency for information and necessary action.

*Attested*

DR. KHAN SAIED.  
M.B.B.S. PHS-(1) M.O.  
AHO. Hospital Khar Bajaur

AGENCY SURGEON BAJAUR AT KHAR.

**ATTESTED**

*Attested*

9

Am - B

THE REVISED B.P.S. SCALE FOR 1991

Existing B.P.S. Scale on 31-5-91  
No of stages occupied in the existing B.P.S.  
Pay fixed on 1-3-91 for the revised B.P.S.

Rahmed Wali  
W. order

625-16-945 Rs. 833/-

13 Stages

Rs. 945-32-1425

ADVANCE IMPLEMENTATIONS FOR THE REVISED QUALIFICATION.

- 1. Metric
- 2. FA/FLO

② Advance from Metric

Sub Office Peshawar  
Total Pay for 1991-92  
Rs. 1425/-  
P. No. of G.O. dated 1-2-1991

Rs. 1425/-  
Stopped

Accounts Officer (PR)  
Sub Office Peshawar

W. Order Bajaur  
at Nhar

ATTESTED

Ahmad Gul

OFFICE OF THE AGENCY  
SURGEON BAJAUR AT KHAR.

/C-5/BJR.

PUBLISHED THE 03/10/94.

OFFICE ORDER.

Sanction to the grant of Move-over in respect of the following officials from BPS to BPS noted against each is hereby accorded with effect from 01/12/93 FN.

SNO.	NAME & DESIGNATION.	FROM BPS	TO BPS.
1.	Rahmat Wali W/O	2	3
2.	Shamraz Khan Cleaner	1	2
3.	Jan Muhd: Peon	1	2
4.	Mian Gul -do-	1	2
5.	Lal Badshah Mali	1	2
6.	Gul Ikhtiar -do-	1	2
7.	Noor Azam -do-	1	2
8.	Sawar Khan -do-	1	2
9.	Sher Buhadar -do-	1	2
10.	Gul Farush -do-	1	2
11.	Manarus -do-	1	2
12.	Said Muhd: -do-	1	2
13.	Khadim Sarwar -do-	1	2
14.	Muhd: Akber -do-	1	2
15.	Sher Zada. Behishti.	1	2
16.	Hayat Khan -do-	1	2
17.	Thahi Bakhat -do-	1	2
18.	Ghulam Khan. -do-	1	2
19.	Muhd: Nasib -do-	1	2
20.	Muhd: Liaq -do-	1	2
21.	Gul Azim -do-	1	2
22.	Farveen -sweeper.	1	2
23.	Nipal -do-	1	2

(Dr. Muhammad Yousaf Khan.)  
Agency Surgeon Bajaur,  
at Khar.

No. 182-205 /C-5/BJR

Copy to the:-

- All concerned for information and necessary action.
- The Agency Accounts Officer Bajaur for information.

Agency Surgeon Bajaur,  
at Khar.

ATTESTED

*Handwritten signature*

100

Amk "C"

1987

XXX

FIXATION OF PAY IN THE REVISED B.P. SCALE 1987.

Name of Official.

Mr Rehmat Wali

Designation

W/o against D.A.

Existing B.P. Scale  
on 30-6-1987.

BPS-2 Rs. 460-12-700 @ Rs. 569/- P.M.

No. of stages occupied  
in the existing BPS

Nine stages (9)

Pay fixed on 1-7-87  
in the revised B.P.S

BPS-2 Rs. 625-16-945 @ Rs. 769/- P.M.

Advance increment for  
the required  
qualification

- i. Matric
- ii. FA/FAC
- iii. BA/BSO
- iv. MA/MSO

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Total pay on 1-7-87

Rs. 769/- P.M.

Next increment

1-12-1987

*[Signature]*  
Agency Surgeon Bajaur,  
at Khar.

M. Nawaz

ATTESTED

*[Signature]*

Amx-  
"D"

GOVERNMENT OF PAKISTAN  
ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA  
DISTRICT BAJAUR

SH: 287

Pers. No. 00508578  
Name: KERHAT WALI  
Dsg.: WARD ORDERLY  
NIC No.: 2110323053371  
GPF Interest Applied  
03 Active Permanent

P Sec: 00 PAYMENT ADVICE 11  
BJ0021 - Agency Surgeon Bajaur Agen  
Min: Min. Of K.A & N.A & S.F.R  
NTN:  
GPF #: BJR/JM/246  
Old #:

PAYS AND ALLOWANCES:

- 0001-Basic Pay
- 1000-House Rent Allowance
- 1210-Convey Allowance 2005
- 1300-Medical Allowance
- 1528-Unattractive Area Allow
- 1548-Rural Compensatory Allowa
- 1948-Adhoc Allowance 2010@ 50%
- 1970-Adhoc Relief Allow 2011

DEPTT CODE BJ0021

Gross Pay and Allowances  
DEDUCTIONS:  
GPF Balance 3,759,00  
3701-Benevolent Fund(Exchange)

1,050,00  
942,00  
850,00  
1,000,00  
1,000,00  
50,00  
3,370,00  
1,011,00

19,273,00

Subrc: 250,00  
120,00

Total Deductions

370,00

NET AMOUNT PAYABLE 18,903,00

QUALIFYING SERVICE 34 Years 05 Months 00 Days  
D. U. B 01.07.1959

LFP Quota: 4  
Payment through DDO.

ATTESTED  
ATTESTED

*Alha Ga*

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

Name .. *Mr. Rahmat-uali*

Race .. *Mohammed*

Residence .. *vill: Luayat-Pilli Bajaur Agency*

Father's name and residence .. *Mr. Amir Wali Khan (as above)*

Date of birth by Christian Era as nearly as can be ascertained. *1959*

Exact height by measurement .. *5'1"*

Personal marks for identification .. *1 mole on Rt cheek*

Left hand thumb and finger impression of (non-gazetted) officer

Little Finger.  Ring Finger. 

Middle Finger.  Fore Finger. 

Thumb. 

*Ahmed*  
**ATTESTED**

Signature of Government servant

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

*[Signature]*  
*[Date]*  
*[Signature]*

MA

21 14 +

1	2	3	4	5	6	7
Name of post	Whether substantive or officiating and whether permanent or	If officiating state - (i) substantive appointment or (ii) whether service counts  under Art. 374 C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment
NPS 2-116/3-140		Jig	100/-	100/-		31/3/77
NPS I 250-5-280/6-340	11	11	250 P.M.			1/5/77
NPS I 250-5-280/6-340	11	11	255 P.M.			1/12/77 P.M.
do			260 P.M.			1/25/77 P.M.
do						

NPS I 250-5-280/6-340  
NPS I 250-5-280/6-340

do

do

ATTESTED

FILED IN THE REVISED MATTERS  
RULES OF PAY (RULES, 1977)  
OF NPS 250-5-280/6-340  
at R.S. No. 115, F.F. 1.5.1977.  
With next increment on 1.12.1977

ASSTT. ACCOUNTS OFFICER  
OF THE ACCOUNTS OFFICE

14/4 77

15

9	10	11	12	13	14	15		
Signature of Government servant	Signature and position of the officer or attesting officer in attest- of columns	Date of termination of appoint- ment	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 for censure, or reward or praise of the Government servant
					Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debit- able to another Government		
				Appointed as Bhishti against the vacant- Post in C.D. Inayat-Dilli vide this office No. 250-51/C-5 dated 31-3-77.				
				Pay revised in the NPS E.C.A. 250-5-1496-543 vide Govt. of N.W.F. Finance Dept. Notification No. FDL30/PR/11-477 dt. 16-5-77				
	Agency Surgeon Bajaur at Khar.						Agency Surgeon Bajaur at Khar.	
			Annual increment allowed				Services verified upto Jan 30 <sup>th</sup> AN	
			Agency Surgeon Bajaur at Khar.				Agency Surgeon Bajaur at Khar.	
			Annual increment allowed				Services verified upto 4 for 30 <sup>th</sup> AN	
			Agency Surgeon Bajaur at Khar.				Agency Surgeon Bajaur at Khar.	
			367 15/11/30 R.R. allow equal to 2 by - R. 12/50				31 10/11/30 R.R. allow equal to half pay amounting to Rs 130/-	
<b>ATTESTED</b>								

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 emoluments falling under the term "Pay"	Date of appointment	Signature
<u>250-5-280/6-410</u>			Pay Rs. 265 P.M.			12/39 PM	
do			Rs. 270 P.M.			12/60	
do			Rs. 275 P.M.			12/81 PM	
do			Rs. 280 P.M.			12/81 PM	

*[Signature]*  
**ATTESTED**

9	10	11	12	13	14	15
				Leave		
				Allocation of periods of leave on average pay up to four months for which leave salary is debit-able to another Government		Reference to any recorded punishment for censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Signature of the head of the office or other attesting officer	
				Government-Period lent to which debit-able		

Annual increment allowed

*[Signature]*

Services verified upto 30-11-79 AM

*[Signature]*

Annual increment allowed

Agency A. S. B. Jaur

R/R Allowance Drawn for Year 19 81.. Rs. 115.00 Vide T. No. 76/ dated 15-1-81

Agency A. S. B. Jaur

Agency A. S. B. Jaur

Special Increment Allowed.

Agency A. S. B. Jaur

30-11-81 AM

*[Signature]*

Annual Increment Allowed

Agency A. S. B. Jaur

30-11-81 AM

*[Signature]*

Year 19 82 Rs. 140/- Vide T. No. 92 dated 8-2-82

Agency A. S. B. Jaur

ATTESTED

1	2	3	4	5	6	7
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. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment
260-6-302/7-365/8-425			Pay Rs. 284.00 P.M.			15 <sup>3</sup> / <sub>22</sub> FN
Jan			Pay Rs. 290.00 P.M.			1 <sup>12</sup> / <sub>82</sub> FN
460-12-700 w/o C.D. 2/2000			Pay Rs. 520.00 P.M.			1 <sup>7</sup> / <sub>83</sub> FN
do			Pay Rs. 520.00 P.M.			1 <sup>12</sup> / <sub>83</sub> FN

ATTESTED

1982

9	10	11	12	13		14	15
Signature and post of the officer or other servant in attesting column	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 Allocation of periods of leave on average pay up to four months for which leave salary is debit-able to another Government Nature and duration of leave taken Period Government to which debit-able		Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant
		<p>pay Released from NPS-I to NPS-2 vide NWFP Finance Dept. Memo No. F.D- (SR-I) I-3/79-III dt: 8.4.82</p>	<p><i>[Signature]</i> Agency Surgeon Bajaur</p>	<p><i>[Signature]</i> Agency Account Officer Bajaur</p> <p>Services verified upto and for 3.9.11-82 AN</p> <p>Agency: Surgeon Bajaur</p> <p>PRA drawn for 1983 B 145-w T- NO 788 dt: 1-1-83</p> <p><i>[Signature]</i> Agency Account Officer Bajaur</p>		<p>Services verified upto and for 3.9.11-82 AN</p> <p><i>[Signature]</i> AGENCY SURGEON</p>	<p>Reference to any recorded punishment for censure, or reward or praise of the Government servant</p>
<p><b>ATTESTED</b></p>	<p>Annual Increment Allowed</p>	<p>Pay Revisited in Basic pay scale NO 2 vide Govt. of NWFP NO PD (SR-I) 1-67/82 dt: 20-5-83.</p>	<p><i>[Signature]</i> AGENCY SURGEON Bajaur</p>	<p><i>[Signature]</i> AGENCY SURGEON Bajaur</p>		<p>Services verified upto and for 3.9.11-82 AN</p> <p><i>[Signature]</i> AGENCY SURGEON</p>	<p>Reference to any recorded punishment for censure, or reward or praise of the Government servant</p>

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 emoluments falling under the term "Pay"	Date of appointment	St. Gc 8
<p>Rs. 460-12-700            Mr. Rehmat Wali W/O            C.D. Inayat Ali</p>			Pay Rs. 544/- PM			1/12/84 F.N.	
<p><i>[Signature]</i></p>			Pay Rs. 556/- PM			1/12/85 PM	
<p><i>[Signature]</i></p>			Pay Rs. 568/- PM			1/12/86 PM	

*[Signature]*  
**ATTESTED**

*[Signature]*

Pay Rs. 568/- PM

1/12/86 PM

8	9	10	11	12	13	14	15	
Signature of the Government servant in attestation of columns		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 Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government Government to which debitable		Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant
		30/11/84 A.N.	Annual increment allowed.	[Signature]	[Signature]		[Signature]	Service verified upto 30/11/84 A.N. [Signature]
		30/11/85 A.N.	Annual increment allowed.	[Signature]	[Signature]		[Signature]	Service verified upto 30/11/85 A.N.
		[Signature]	AGENCY SURGEON	[Signature]	AGENCY SURGEON		[Signature]	AGENCY SURGEON
		30/11/86 A.N.	Annual Increment Allowed	[Signature]	[Signature]		[Signature]	Services verified upto and for 30/11/86 A.N.

Ex. Pension in B. Pt B. 1953  
 Fixed Basic Pay Scale  
 2 460 - 12 - 700  
 Rs. 520/-  
 with date 12/1958

[Signature]  
 ASSISTANT AGENT OFFICER  
 ACCOUNTS OFFICER (P.D.)  
 STATE OFFICIAL, PESHAWAR

[Signature]  
**ATTESTED**

[Signature] [Signature] [Signature]  
 AGENCY SURGEON

1 Name of post	2 Whether substantive or officiating, and whether permanent or temporary	3 If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371. C. S R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term 'Pay'	7 Date of appointment	8 Signature of Government servant
Rs 625-16-945 BPS-2 Mr. Rehma I Wal W/O against DSI	Offg. Tempy.		Pay Rs 769/- P.M.			1-2-87 F.N.	
do	do		Pay Rs 785/- P.M.			1/12/87 F.N.	
do	do		Pay Rs 801 1/2 P.M.			1/12/88 P.N.	
do	do		Pay Rs 817 1/2 P.M.			1/12/89 P.N.	
do	do		Pay Rs 833 1/2 P.M.			1-12-90 P.N.	

ATTESTED

8	9	10	11	12	13		14	15	
Signature of the Government servant in attestation of columns	Signature of the head of the office or other attesting officer	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	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant
						Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government	Period Government to which debitable		
		30/6/87	Pay revised vide F.P. circular letter H.N. NO. FD. (PRC) 1-1/87-VII. dt. 22/7/87					Service Verified up to & for 30/6/87 A.N.	
		3/11/87	Annual increment allowed					Service Verified up to & for 30/11/87 A.N.	
		30/11/88	A.N.					30.11.88	
		30.11.89	A.N.					30.11.89	
		30-11-90	A.N.					30-11-90 A.N.	

*[Handwritten signatures and stamps]*  
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 AGENCY SURGEON

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1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term 'Pay'	Date of appointment	Signature of Governor or other authority in attestation of copy
P. 45-32-1425		Rs. 1297 1/2 PM				2/6/91 N	
de		Pay Rs 1361 1/2 PM				1-6-91 N	
de		Pay Rs 1393 1/2 PM				1/12/91 N	
no	<p>Office of the Accounts Officer (PR) Sub Office Peshawar.</p> <p>Two Advancements Office of the Accounts Officer (PR) Sub Office Peshawar.</p>	Rs. 1425 1/2				12 1-7-92 N	

Office of the Accounts Officer (PR)  
Sub Office Peshawar.  
Pay fixed at Rs. 625-16-945  
with next increment on 1-7-1-87.  
Rs. 769/-  
with next increment on 1-2-1-87.

Office of the Accounts Officer (PR)  
Sub Office Peshawar.  
Pay fixed at Rs. 455-32-1425  
with next increment on 1-12-1-87.

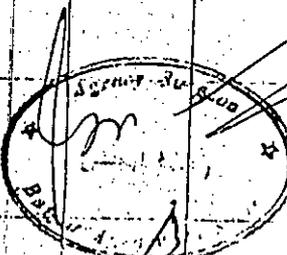
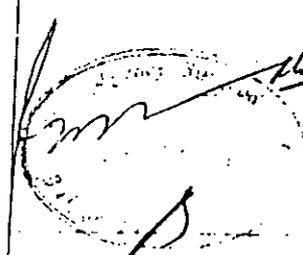
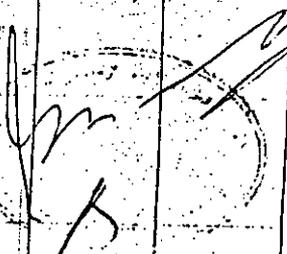
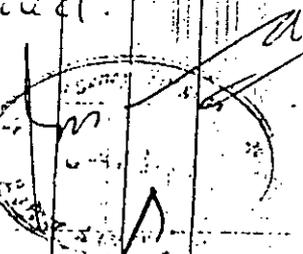
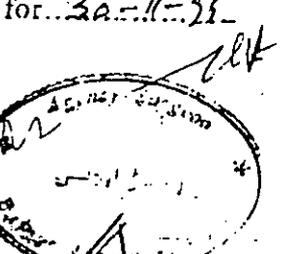
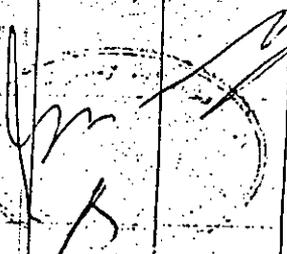
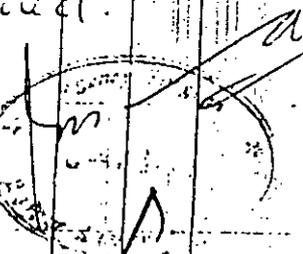
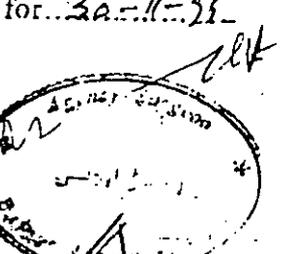
Accounts Officer (PR)  
Sub Office Peshawar.

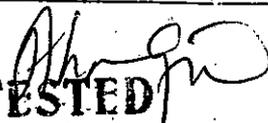
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1 Name of post	2 Whether substan- tive or officiating, and whether permanent or temporary	3 If officiating state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371. C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature of the Governor at service of col
<u>975-37-1530</u> BPS-3			Pay Rs. 1454/pm			1/12/93	
<u>1320-50-2070</u> BPS-3			Pay Rs. 1970/pm			1/6/93	
<u>do</u>			Pay Rs. 2020/pm			1/12/93	

*M. S. J.*  
**ATTESTED**

9	10	11	12	13	14	15	
Signature and Name of the Government servant in at least two columns	Date of termination of appoint- ment	Reason of termination (such as promotion transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and dura- tion of leave taken	Leave Allocation of periods of leave on average pay up to four months for which leave salary is debitas- ble to another Government Period - ent to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure, or reward or praise of the Government servant
	31/11/93	Move-over granted from BPS-2 to BPS-3 with this office order. No. 185-245/CS dt. 3/2/93					Service verified upto 30-11-93
	31/5/93	Pay fixed as revised by scale P.S. 1970/P.M.D. W.P. 1-6-93 with Finance Dept. No. F-102 dwp/93 dt. 15-6-93					Service verified upto and for 30-11-93
	30/11/94	Annual Exercise of Allowance.					Service verified upto and for 30-11-93

ATTESTED 

ATTESTED

*[Signature]*

*[Signature]*

18/96 PM

RS: 2172/PM

18/96 PM

RS: 2141/PM

1360-58-2230  
BPS-4

18/96 PM

RS: 2070/PM

1380-50-2070  
BPS-3

1	2	3	4	5	6	7
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating - (i) substantive or (ii) whether or not service counts for pension C.S.R. under Art. 371.	Pay in post	Additional pay for officiating	Other emoluments falling under "Pay term"	Date of appointment

*[Signature]*

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Signature and designation of the head of the office or other attesting officer in attestation of columns 10 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 periods of leave on average pay up to four months for which leave shall be admissible in another Government Period not to which Government is not applicable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment for censure or reward or promotion of the Government servant

30<sup>11</sup>/<sub>95</sub> AN

Annual Increment allowed

Services verified upto and for 30-11-94

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

30<sup>11</sup>/<sub>96</sub> AN

move-over granted prm BPS-3 to BPS-4 vide this office order No 743-89/C-5 dated 15-4-1998

Services verified upto and for 30-11-96

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

30<sup>11</sup>/<sub>97</sub> AN

Annual Increment allowed

Services verified upto and for 30-11-97

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

*[Signature]*  
AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

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AGENCY SURGEON  
Bajaur Al Kh...  
*[Signature]*

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**ATTESTED**

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1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	
<u>1360-58-2230</u> BPS-4			Rs. 2230/- pm			1/18/98 PM	
<u>1400-66-2390</u> BPS-5			Rs. 2250/pm			1/18/99 PM	
<u>1400-66-2390</u> BPS-5			Rs. 2324/pm			1/12/2000 PM	

*[Handwritten signature]*  
**ATTESTED**

9 Signature and designation of the head of the office or other attesting officer in attestation of 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 Allocation of periods of leave on average pay up to four months for which leave salary is debit-able to another Government Government Period to which debit-able	14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment for conduct or reward or praise of the Government served
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30<sup>11</sup>/<sub>98</sub> AD

Annual increment allowed

Services verified upto and for 30-11-98

AGENCY SURGEON  
Bajaur Al Khar

AGENCY SURGEON  
Bajaur Al Khar

AGENCY SURGEON  
Bajaur Al Khar

30<sup>11</sup>/<sub>95</sub> AD

Annual ~~increment~~ ~~allowed~~ granted from BPS-4 to BPS-5, pay fixed in BPS-5, RS=2258/- per m. et 1-12-1983 vide this office letter No. 1470-1524/C-7/12/83 D/4/12/83

AGENCY SURGEON  
Bajaur Al Khar

30<sup>11</sup>/<sub>2000</sub> AD

Annual increment allowed

and for 30-11-2000

AGENCY SURGEON  
Bajaur Al Khar

AGENCY SURGEON  
Bajaur Al Khar

AGENCY SURGEON  
Bajaur Al Khar

ATTESTED



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 emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
BPS-5			Rs- 2380/-pm			1/12 For 201	
1915-65-3865			Rs- 3605/-pm			1/12 For 2007	
BPS-2							
do			Rs- 3670/-pm			1/12 For 2007	
do			Rs- 3735/-pm			1/12 For 2007	
do			Rs- 3800/-pm			1/12 For July	

*Shree*  
**ATTESTED**



(For use in police and other similar Departments)

RECORD OF POSTINGS

Date	No. of District Order	District and post	Date	No. of District Order	District and post
1/2 1905	1/2 1905	K&L 4375/-pm	K&L 4375/-pm	K&L 4375/-pm	K&L 4375/-pm
1/2 1905	1/2 1905	K&L 4375/-pm	K&L 4375/-pm	K&L 4375/-pm	K&L 4375/-pm

ATTESTED

*[Signature]*

*[Signature]*

12/10 1905: Dec

2-200-75-465

**BEFORE THE HON'BLE DIRECTORATE OF (HEALTH) SERVICES**  
**FATA, WARSAK ROAD, PESHAWAR**

**DEPARTMENTAL APPEAL**

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Departmental Appeal with affidavit		1-3
2.	Copy of Notification	A	4-5
3.	Copy of Revised pay scale	B	6
4.	copy of monthly salary	C	7

Dated: 24/08/2015

Appellant

*Rwali*

**Rehmat Wai**  
S/o Amir Wali Khan  
Ward Orderly

**ATTESTED**

*Ahmad*

136

**BEFORE THE HON'BLE DIRECTORATE OF (HEALTH) SERVICES**  
**FATA, WARSAK ROAD, PESHAWAR**

Subject: **DEPARTMENTAL APPEAL**

**Respected Sir,**

That the appellant respectfully submits the following:

1. That the appellant belongs to a respectable family of village INayat Killi, Bajaur Agency.
2. That the appellant is at presently serving under Directorate of Health (FATA).
3. That the appellant was initially enlisted as Bhishti in the time scale of pay vide Notification No. 250-251/C.S. dated 31/03/1977 in a vacant post in civil Dispensary Inayat Killi (Bajaur Agency). (Copy of Notification is attached herewith as annexure "A").
4. That the appellant trade has changed from Bhishti to Ward Orderly in the year while preparing his Revised Pay Scale in the year of 1991. (Copy of

**ATTESTED**  
*[Signature]*

Revised pay scale is also attached herewith as annexure "B").

5. That the services of the appellant has already been regularized in accordance with law.
6. That the appellant has now came to his knowledge that the department concerned intend to change his designation from Ward Orderly to some-what not known designation i.e. Dai.
7. That the appellant is at presently serving as Ward Orderly in BPS-5, for which the copy of monthly salary is also attached herewith for perusal please as annexure "C".
8. That unnecessary change/ alteration was made in the Service Book of the petitioner by the Clerical Staff of the concerned department intentionally and deliberately.
9. That the appellant feels that at the time of his retirement to Pension Establishment, his legal rights, such like enlistment of his children on the

*Attested*  
**ATTESTED**  
**ATTESTED**

basis of quota allotted for the purpose in accordance with laws, would be infringed/ bulldozed of by department concerned due to alteration.

It is, therefore, most humbly prayed that on acceptance of instant departmental appeal, subsequent entry of appellant in the service record as Dai being illegal may be set aside with the direction to in corporate correct entry as Ward Orderly.

Appellant

*Rehmat*

**Rehmat Wali**

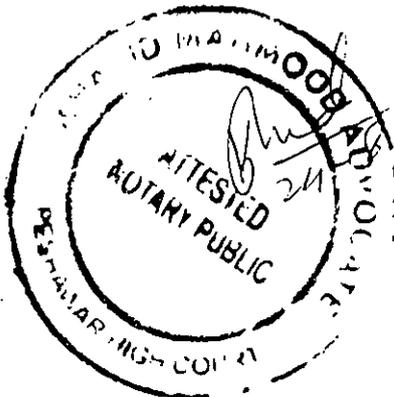
S/o Amir Wali Khan  
Ward Orderly

Dated: 24/08/2015

**AFFIDAVIT**

I, **Rehmat Wali** S/o Amir Wali Khan (the appellant) solemnly affirm and declare on oath, that the contents of the **Departmental Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

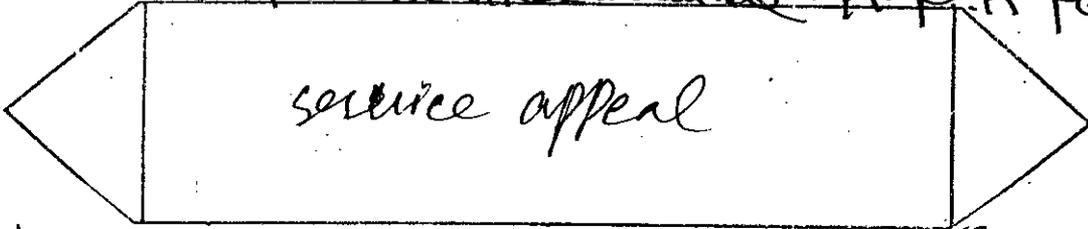
*Abul*  
**ATTESTED**  
**ATTESTED**



*Rehmat*

**DEPONENT**  
**Rehmat Wai**

Before The <sup>الکلیات</sup> K.P.K Peshawar



Petitioner <sup>مقدمہ</sup> بنام

Rehmat wal <sup>مقدمہ</sup> vs <sup>مقدمہ</sup> Service appeal

Secretary social sector department  
F.A.T.A. & others  
Respondents <sup>باعث کریا نکلہ</sup>

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام ~~سے~~ کیلئے ~~جسٹس~~ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا دکالت نامہ لکھ دیا کہ سندر ہے۔

انمقوم 4 ماہ اپریل 2016

کے لئے منظور ہے۔

Attested & accepted

Jahan <sup>4/1/16</sup> Advocate

Quali