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Appeal No. 1631/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	· · · · · · · · · · · · · · · · · · ·	3 15 June 19 July 19 J
1-	09/08/2023	The appeal of Mst. Rooqia Bibi resubmitted today
,		by Mr. Muhammad Adeel Butt, Advocate. It is fixed for
		preliminary hearing before Single Bench at Peshawar on
		11-08-2023

By the order of Chairman

REGISTRAR

Service Appeal N	o. 1631	_/ 2023		
Rooqia Bibi		••••		Appellant
		V	'ersus	
Govt. of Khybe others	r Pakhtunkhwa	through	Secretary	Education andRespondents

<u>INDEX</u>

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4	Copy of re-deployed order	В	8
5.	Copies of salary slips	C	9+21
6	Copy of departmental appeal	D	22
7	Wakalatnama		23

Appellant

Dated: 03.08.2023

Through

Muhammad Adeel Butt

Humera Gul Advocator **Advocates High Court**

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 63/ / 2023

Rooqia Bibi D/O Arifullah W/O Tariq Bilal GGPS Latif Kalay, Bara, Khyber Agency R/O Mohallah Bamat khel, Umerzai, District Charsadda Appellant Versus

- 1. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar
- 2. Director of Education, Directorate of Education situated at GT Road Peshawar City.

APPEAL, AGAINST THE INACTION OF RESPONDENTS, WHEREBY THE APPELLANT HAS NOT BEEN PAID HER MONTHLY SALARIES BY THE RESPONDENTS AND, NOT ALLOWING HER TO PERFORM HER OFFICIAL DUTIES WITHOUT ANY REASON.

Prayer:

On acceptance of appeal the appellant may please be allowed to perform her duties with all back benefits. Any other remedy deems fit may also be granted under the circumstances.

Respectfully Sheweth:

The Appellant submits as under: -

1. That, consequent upon the approval of Departmental

appointed against the vacant post of T.T on 25.08.2009 at Government Girls' Primary School, Latif Kalay, Bara Khyber Agency, in BPS -07. (Copy of the Appointment order is annexed as Annexure "A")

- 2. That due to the Talibanisation and usual law and order situation at that time the Appellant was re-deployed to GGPS Hayat Shah Killi Mulagori Jamrud on 21/05/2015. The Appellant performed her duties to the best satisfaction of Respondents and hence the respondents were paying her monthly salaries till 2017. (Copy of Re-deployed is annexed as Annexure "B")
- 3. That since the respondents without any reason stopped her salaries and she has been stopped verbally not to perform her official duties. Appellant was not given monthly salary, for which Appellant has submitted several applications for releasing her salaries, but in vain. It is important to mention that the respondents have not issued any letter regarding stoppage of her pay/salary nor there is any charge against her. The Appellant tried her level best and knocked every door in order to get her salaries paid but the Respondents have taken no action whatsoever. (Copies of Salary Slips are annexed as Annexure "C")
- 4. That finally the Appellant filed a departmental representation /appeal before the Respondents on 30.03.2023 and waited for the stipulated period of time but as mentioned above no action whatsoever has been taken by them. (Copy of Departmental Appeal is annexed as Annexure "D")
- 5. That the Appellant feeling aggrieved from the inaction of Respondents files the instant Service appeal inter alia on the following grounds: -



GROUNDS:

- A. That the Appellant has not been treated in accordance with law.
- B. That it is a settled principle of Law that no one can either stop the salary of a Civil servant or stop one in performing his duty without adopting the due process of law without adopting due course of law, no one can stop the can salary.
- C. This act / inaction of Respondents against the Appellant is violation of the principles of policy contained in Chapter 2 part-II of the constitution and also Article 3 of the Constitution, which cost duty on the state to eliminate all forms of exploitation.
- D. That the above mentioned issue has sufficiently been dilated in the recent judgment of this Court in case, "Abdul Latif and others Vs Secretary C&W Department Khyber Pakhtunkhwa, Peshawar and 5 others 2014 PLC (C.S.) 330, wherein it is held that:

"Their appointments are not questioned to have been made in violation of law. They are working since their appointment in January, 2013 without salaries, which is harsh in nature. The record is also silent about any query from the appointing authority of the petitioners to the effect as to whether appointments were made in violation of law or without observing the legal and formal codal formalities, required for appointment. Though there appears no illegality in the appointment of the petitioners, even then, if any irregularity is alleged and based for non-issuance of NOC, the same could not be made as hurdle by the concerned authorities, as the appointment of an employee, if in any case made against the established procedure, would not burden him, rather the appointingauthority would rosnonsible for committing misconduct by making

irregular appointments. Reliance in this respect is placed on the case of Province of Punjab through Secretary Agriculture, government of Punjab and others V. S Zulfiqar Ali (2006 SCMR 678)."

It is hereby worth important to mention that no reason whatsoever has been communicated to the Appellant with respect to stoppage of her Salary and performance of duty.

- The Secretary, Establishment Division, Government of Pakistan and others 1996 SCMR 1185 as under: (at page1193 para16). Para 16. "If a Tribunal or this Court decides a point of law relating to terms and conditions of a civil servant who litigated, and there were other civil servants, who may not have taken any legal proceedings, in such a case, the dictates of justice and rule of good governance demand that the benefit of the said decision be extended to other civil servants also, who may not be parties to that litigation instead of compelling them to approach the Tribunal or any other legal forums" Same view has also been applied to the case of Tara Chand and others V. Karachi Water & Sewerage Board, Karachi 2005 SCMR 7 (Prov. Govt. Vs. Niaz Ali & others) 499 (at page 506 para 10) and Govt. of Punjab through Chief Secretary Education & others Vs. Sameena Parveen 2009 SCMR 1 (at page 4 para 6).
- F. That the Appellant being a married woman having little kids knocked the doors of Respondents but till now no action whatsoever has been taken in respect of her salaries and performance of duty.
- G. That the Respondents are well aware about the fact that from the years 2000-2011, the whole Khyber agency wasthe victim of terrorism, and much of the official record of

quite impossible for them to find out the record related to Appellant with respect to her performance in schools, hence they purposely are delaying the matter.

That the Appellant belongs to a very poor family and H. teaching is the only source of income,.

It is, therefore, most humbly requested that on acceptance of this appeal, respondents may kindly be directed to release/ pay the monthly salaries of the Appellant from year 2017 till date and the appellant may please be allowed to perform her duties with all back benefits.

Any other remedy deems fit may also be granted under the circumstances.

Appellant

Through

Dated: 03.08.2023

mad Adeel Butt

Humera Gul Advocates High Court

Note: No such appeal has ever been made to Service Tribunal on the subject by the appellant or in any other court of Law.

Appellant

<u>AFFIDAVIT</u>

As per direction of my client I, do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal. ATTESTED

Mumerly

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Rooqia Bibi		Appellant
•	Versus	

ADDRESS OF THE PARTIES

APPELLANT:

Rooqia Bibi D/O Arifullah W/O Tariq Bilal GGPS Latif Kalay, Bara, Khyber Agency R/O Mohallah Bamat khel, Umerzai, District Charsadda

RESPONDENTS:

- Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar
- Director of Education, Directorate of Education situated at GT Road Peshawar City.
- District Education Officer, DEO Office, District Khyber

Appellant

&

Through .

Muhammad Adeel Butt

Khamanar Humera Gul Advocates High Court

Dated: 03.08.2023



AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD APPOINTMENT ORDER

Consequent upon the approval of the Departmental Selection Committee Mrs: Rooqia Bibi D/o Arif Ullah candidate is hereby appointed against vacant T.T Post at Government Girls Primary School Latif Killi Bara Khyber Agency in BPS No.07/PM (3530-190-9220) plus usual aflowances as admissible under the rules w.e.f the date of her taking over charge in the interest of public service.

Note:-

1. Charge report should be submitted to all concerned.

2. The appointment of the candidate is purely on temporary basic and is liable to terminate any time without any notice.

3. If the candidate wishes to resign her post she will give one-month prior notice or her pay for one month will be forfeited in lieu thereof.

4. Her documents, Date of Birth and NICshould be checked before handed over charge of the post and attested copies thereof may be kept on record of the school/office.

5. She should produce his Health and Age certificate from the Agency Surgeon concerned.

6. She may not be handed over charge if he is below 18-, years or above 40- years.

7. If he fails to report her arrival within 15- days of the issue ofthis appointment arrive then it will be treated as cancelled.

8. We salary may be drawn before the verification of all the testimonials from the quarter concerned.

9. The appointment will not be entitled for pension/commutation and G.P Fund empluments as per Govt: policy.

(HASHIM KHAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Dated Jamrud the. 25 / 08 /2009.

Endst: No. 4070-76/

Copy of the above is forwarded to the:-

- 1. Director Education (FATA) at Peshawar.

2. Agency Acrounts Officer Khyber Agency at Jamrud.

3. Agency Surgeon Khyber Agency at LandiKotal.

4. AAEO (Female)/ Pay Clerk Concerned. .

5. Official Concerned.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMBUD





AGENCY EDUC	ATION OFFICE
KHYBER AGENCY AT PHONE. 091-5820584	, JAMRUD 1 fax 091-5820584
NODATED	

AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD

REDEPLOYMENT ORDER.

Consequent upon the recommendation of AAEO (Female) Jamrud/Bara the following teachers of Tehsil Bara are hereby redeployed to Schools noted against their names on their own request with immediate effect, till the re-opening of their own Schools.

S.#	Name	Name Desg From		Redeployed to		
1	Shaheen AKhtar	TT	GGMS Tehsil Bara	GGHS Jamrud.		
2	Nusrat Begum SST GGHS Karigar Bara. Farida CT GGHS Karigar Bara.		GGHS Jamrud			
3			GGHS Jamrud			
4	Shamshad Begum	PST	GGHS Karigar Bara.	GGHS Jamrud.		
5	Farzana Jamal CT		GGMS Malang Garhi	GGHS Jamrud		
6	Safia Begum	PST	GGPS Musam Jan Killi Bara	GGPS Zulifiqar Killi LKL		
7.1	Saima Zarin	PST	GGPS Musam Jan Killi Bara	GGPS Mira Jan Bara		
8	Rooqia Bibi	TT	GGPS Latif Killi Shalobar Bara	GGPS Hayat Shan Killi Mulagori Jamrud		
,	Saima Begum PST GGPS Akhtar Ali Shah Bara			GGPS Hayat Shah Mulagori Jamrud		

Note: Charge report should be submitted to all concerned.

TA/DA is not allowed.

AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD

Endst: No. 13241-46 Redeployed File

Dated: 21/05/2015

Copy forwarded to the:

- 1 Director Education FATA at Peshawar.
- Political Agent Khyber Agency at Peshawar.
- 3 Principal GGHS Jamrud Khyber Agency
- 4 AAEO (F) Local Office.
- 5 Superintendent local office
- 6 Officials concerned.

AGENCY EDUCATION OFFICER



10 YEAS OSOUERIMENPOFIPURSTAN ACCOUNTANT GENERAL N.W.F.P

DISTRICT

PAYMENT ADVICE

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Dsg.: THEOLOGY TEACHER
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Pers #: 00524096 Buckle:

Name: ROQYYA BIBI

THEOLOGY TEACHER

CNIC No.2710124763456 GPF Interest Applied

14 Vocational Temporary

PAYS AND ALLOWANCES:

0001-Basic Pay

1000-House Rent Allowance

1210-Convey Allowance 2005

1300-Medical Allowance

1528-Unattractive Area Allow

1948-Adhod Allowance 2010@ 50%

1970-Adhoc Relief Allow 2011

2118-Adhoc Relief Allow (2012)

2151-Adhoc Allowance 2013 @10%

Gross Pay and Allowances .

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3701-Benevolent Fund(Exchange)

3704-Group Insurance (Exchange)

3711-Addl Group Insuranc (Exch)

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HABIB BANK LIMITED UMARZAI

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The entries in this page should be renewed or re-attested at least every five years and the signature to lines Note:-9 and 10 should be dated. ROQIA Name: 2. Race:-Residence: Plo UMBRZAI DISTI CHARSADDA. ARTKOMME. Father's name and residence: Fourteen April N. H Eighty Six. Date of birth by Christian era as 🔨 nearly as can be ascertained: 5-5⁻ Exact height by measurement: Nil Personal marks for identification: Left hand thumb and finger impression of (Non-Gazetted) officer: Little Finger Ring Einger Middle Finger Fore Finger Thumb Signature of Government Servant: AGENCY EDUCATION OFFICEN 10. Signature and designation of the Head of the Office, or other Attesting Officer. AGENCY EDUCATION OFFICER

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$RS = \frac{3720}{pm} I_{\frac{12}{2010}}$ $Revise dol per Bps - 07 (5800 - 320 - 15400)$ $R_{1}, 6120 pm I_{\frac{7}{2011}}$ $R_{2} 6440 pm I_{\frac{12}{2011}}$ $R_{3} 6760 pm I_{\frac{12}{2012}}$ $R_{4} = \frac{12}{2012}$ $R_{5} = \frac{12}{2012}$			9	R8 =	3539	Pm	12/2009	2.2
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Signature and Designation of the head of the office or other attesting officer in attestation of columns 108	Date of termination or 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.	Alloc leave o four mo sala	ave ation of period of in average pay upto in the for which leave ry is debitable to ther Government Government to which debitable	Signature of the head of the office or other attesting officer	Reference to ar recorded punis ment or consur or praise of the Government Servant.
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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 "p"	Dato of appointment	Signature of Government Servant.
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9 10 15 Leave Reason of Allocation of period of Reference to any Signature and Designation Nature leave on average pay upto-four months for which leave Signature of Signature of the recorded punish of the head of the office Date of such as and head of the office the head of the ment or censure or other attesting officer termination or promotion, duration salary is debitable to another Government office or other or praise of the Government or other attesting in attestation of columns 1 to 8 transfer, dismissal, appointment. of officer. attesting officer leave Servant. Government to etc.) taken. Period which debitable Mewe 10 BP5-14 AEO KHYBER! ZAEO KHYBER An > 30 2014 nem Seomer Wallie Rowin 1-49 6 4 bel(-11-2015 From the 34 /AEC KHYBER 30/15 and other second of this offer AEO KHYBER (4, AGENCY EDUCATION OFFICE 2015 que 30 KHYBER AGENCY AT JAMPUD /XEO WAIVE !

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محدمت جناب ڈاٹر مکٹرصاحب ایجو کیشن خیبر پختون خواہ پھاور

عنوان سائلہ کی تخواہ جاری کرے۔اور ڈیوٹی پرتعینات کرنے کی اجازت دی جائے جناب عالی: ا

نہایت اوب سے گزارش کی جاتی ہے کہ سائلہ گورنمنٹ گراز پرائمری سکول لطیف کل شاہر جھیل باڑہ میں بھرتی ہوئی تھی۔ لیکن اس وقت باڑہ جھیل کے حالات خراب تھے اور تمام تحصیل کے سکول بند تھے۔ اور سائلہ کو حصیل کے سکول بند تھے۔ اور میاں گور تعینات کیا۔ کیا۔ کیکن سکول بہت دور تھا اور سائلہ کے اس وقت چھوٹے چھوٹے نے تھے۔ اور وہاں پرڈیوٹی کرنامشکل تھا۔ کیا۔ کیکن سکول بہت دور تھا اور سائلہ کے اس وقت چھوٹے چھوٹے نے تھے۔ اور وہاں پرڈیوٹی کرنامشکل تھا۔ سائلہ کو دوبارہ Re-deployed گور نمنٹ گراز پرائمری سکول مثل خان کلے میں تعینات کیا گیا۔ حس سائلہ کو دوبارہ کی بیار ایجنسی ایجوکیشن آفہر جمر ودکو درخواستیں دی ہیں گرکوئی شنوائی نہیں ہوئی۔ پرنظر خانی کیلئے اس سے پہلے بھی کئی بارا بجبنسی ایجوکیشن آفہر جمر ودکو درخواستیں دی ہیں گرکوئی شنوائی نہیں ہوئی۔ لہذا آپ صاحبان سے درخواست کرتی ہوں کہ سائلہ کی تخواہ جاری کرنے کے احکامات صادر فرمائی جائے اور سائلہ کوڈیوٹی پرفتینات کرنے کی اجازت دی جائے تاکہ سائلہ اپنی ڈیوٹی احس طریقے سے سرانجام دیں۔ سائلہ کی سروئی کا غذات درخواست کے ساتھ منسلک ہیں۔

آپ کی عین نوازش ہوگی۔ تاریخ: 2023-03-30

SA

The Charles

العارض

روقیہ بی بی ٹی ٹی سکول ٹیچر پرسنل نمبر 524096

پتة : محلّه بامت خيل ، عمر زنگ مخصيل وضلع چارسده رابط نمبر : 9833798 0314-9818740 و رابط نمبر

dainy No: 1094 date: 04.04.2023