


FORM OF ORDER SHEET

Court of _____

Appeal No. 1920 / 2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2024	<p>The present appeal resubmitted today by Muhammad Ismial Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 17.10.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The joint appeal of Mr. Mustafa Zeb and 33 others received today i.e. on 03.09.2024 is in complete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal be signed by the appellants.
- 2- Check list is not attached with the appeal.
- 3- Annexures of the appeal are not attested.
- 4- Sub-rule- 2 of rule-3 of the appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately. Therefore, the appeal of the above named appellants may be filed separately/individually.
- 5- Annexures of the appeal are illegible be replaced by legible/better one.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 774 /Inst./2024/KPST,

Dt. 12/9/2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Ismail Khan Adv.
High Court Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Service Appeal No. 1920 / 2024

Shah Muhammad VERSUS The District Education Officer (Male) District Charsadda.

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5	Copies of appellants Charges Reports dated 31-05-2014	B	9
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Appellant

Through counsel

Muhammad Ismail Khan

Amin Ullah Jan

Amjid Khan Mohmand

Advocates High court Peshawar

Office: Al Mansoor Hotel opposite Gulbahar Police Station Near BRT Stop
Main GT Road Peshawar. 0346-9192028

①

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 1920 /2024

Shah Muhammad S/O Khair Muhammad (SPST, BPS-14) Government Primary School
Shahbaz Khan Korona Shabqadar District Charsadda

.....Appellant...

Versus

1. The Director Education Elementary and Secondary Education Khyber Pakhtun Khwa Near Govt Higher Secondary School No-1 GT Road Peshawar.
2. The District Education Officer (DEO) Male District Charsadda.
3. The Sub District Education Officer (SDEO) Shabqadar District Charsadda.
4. The Accountant General AG office Khyber Pakhtun Khwa Fort Road Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT ALLOWING/RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, AND ALSO REQUEST FOR ALLOWING THE INCREMENT FOR YEAR 2014, AND AS WELL AS AGAINST THE DEPARTMENTAL APPEAL WHICH SUBMITTED ON DATED 08-05-2024 WHICH NOT DECIDED IN STIPULATED PERIOD, WHICH IS THE INACTION OF THE DEO MALE CHARSADE, WHEREAS THE DEPARTMENT NOT GIVEN ANY RESPONSE TO APPELLANT.

PRAYERS.

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL WITHIN THE STIPULATED PERIOD AND NOT ALLOWING THE ANNUAL INCREMENT FOR THE YEAR 2014 AND NOT RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, MAY VERY KINDLY BE DIRECTED TO ALLOWING THE INCREMENT FOR THE YEAR 2014 WITH ALL BACK BENEFITS AND ALSO RELEASE THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014. OR ANY OTHER REMEDY/RELIEF WHICH THIS HON'BLE COURT/TRIBUNAL DEEMS FIT AND APPROPRIATE MAY KINDLY ALSO BE AWARDED/PASSED IN FAVOUR OF APPELLANT, AS THE SAME ISSUE AND QUESTION IN IDENTICAL NATURE CASE IN SERVICE APPEAL NO 7597 OF 2021 ALSO BEEN ALLOWED AND DECIDED ON DATED 06-11-2023 BY THIS HON'BLE COURT.

Respectfully Sheweth.

The Appellants humbly submits as under.

FACTS.

Brief facts of the Appeal are as under. }

1. That the Appellants are the employee of the education Department, and were initially appointed as Primary School Teacher PST BPS-12 on ADHOC Basis after fulfilling all the legal and codal formalities required for the post under the law and Rules Regulation.

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2. That all the Appellants after scrutiny and through proper channel by the Departmental Selection Committee DSC Under the supervision of DEO Male and other respected members of the committee appointed the appellants as primary school teacher PST BPS-12 on dated 31-05-2014.
(Copies of Appointments Orders dated 31-05-2014 is attached and annexed as A)
3. That the Respondent issued the appointments orders for the post of PST to all the Appellants, and when all the appellants received the appointment orders on dated 31-05-2014, they submitted their arrival reports and took over Charge reports of the PST Posts assigned in the appointments orders on dated 31-05-2014, and made entry in the Attendance Register in the school, since then the appellants are working with full zeal and according to their efficiency and with full devotion satisfaction of the School Head.
(Copies of Charge Reports dated 31-05-2014 annexed as B and attendance Register Attached as C)
4. That Service Book of the Appellants was also prepared and necessary entries were made therein in the service books from the date of initial appointments till date.
(Copies of Service Books are attached and annexed as D)
5. That after satisfactory duties of all the Adhoc Teachers, the Govt of Kp through Regularization Act 2017 including appellants in the year 2018, they all were regularized from the date of their initial appointments orders i.e. 31-05-2014. the date which is 31-05-2014 is also mentioned in the heading of the regularization order of the Appellants as well as other candidates of PST.
(Copy of Regularization Order annexed as E)
6. That thereafter the appellant were also promoted from the Post of PST BPS-12 to post of Senior Primary School Teacher SPST BPS-14 by the Departmental Promotion Committee DPC under the supervision of DEO and other officials, Vide order dated 19-05-2020. And the Appellants were in at Serial No
(Copy of Promotion orders annexed as F)
7. That the appellant were facing huge financial discrepancy in their monthly salaries due to the reasons that increment for the year 2014 were not allowed and also the salaries for month of June July and august 2014, were not released for which the appellants made several visits and request verbally as well in shape of applications appeals etc.
(Copies of application and appeals annexed as G)
8. That at last the Respondent No-3 SDEO Shabqadar send one letter to DEO Male Charsadda on dated 22-04-2024, for further action but despite applications reminders to Respondents, they are not given positive response.
(Copies of SDEO Male letter to DEO annexed as H)
9. The service appeal decision in the same nature issue and matter had came to the knowledge of the appellants, which also mentioned in the application, title case ABDUL MUSAWIR VS EDUCATION DEPARTMENT service appeal.No- 7597 of 2021, which was decided by the Hon'ble Bench Member of Service Tribunal Peshawar on dated 06-11-2023, whereas the same relief given and granted to one teaching cadre who also appointed with the appellants as PST and later he regularized and also promoté as SPST BPS-14.
(Copy of same identical nature case and Court order of KP service Tribunal dated 06-11-2023 annexed as i)

10. That after the above said mentioned process, when no such relief given to appellants, then the appellants filed departmental appeal to Directorate Education, and attached all the relevant documents correspondence, but till now, no such response/relief given to appellants.

(Copies of Departmental appeals to Directorate annexed as J)

11. That the appellants were also visited to concern quarter of accounts office to allow and include the same increment as well as salaries to appellants, but till date the same is neither included nor been allowed in the appellants salaries slip records.

12. That feeling aggrieved from the inaction of the respondents to not decide the departmental appeal and by not allowing the annual increment for year 2014 as well as the salaries of the month of June July and august 2014, the repeatedly visits applications requests and at last departmental and same identical nature service decided case/appeal, the respondents on no grounds And without showing any reasons were silent on the appellant appeals.

13. That feeling aggrieved by all the appellants, and having no other remedy except filing this service appeal on the followings grounds.

GROUND:

A. That the act and omission of the Respondents by illegally deducting annual increment for the year 2014, and not releasing the monthly salary for the month of June, July and August 2014, is against the law, facts material available on records and norms of natural justice hence not tenable in the eyes of law and is liable to be struck down.

B. That the appellants has not been treated by the respondents department in accordance with law and rules on the subject noted above and as such the Respondents violated article 4 and 5 of the Constitution of Islamic Republic of Pakistan 1973.

C. That the Appellant has properly submitted his charge report and made attendance Register of the school on dated 31-05-2014, and as such the appellant has spent 180 days on 1st December, that the entitles the appellant for the annual increment of the year 2014.

D. That the act of the Respondents by illegally deducting annual increment for the year 2014, and not releasing the monthly salary for the month of June, July and August 2014, is against the prevailing Law and Rules.

E. That the Respondents violated Article 38(E) of the constitution of the Islamic Republic of Pakistan 1973, according to which *"The state is bound to eliminate disparity in the income and earning of individuals including persons in the various service of Pakistan"*. Thus in light of above the Respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July and August 2014.

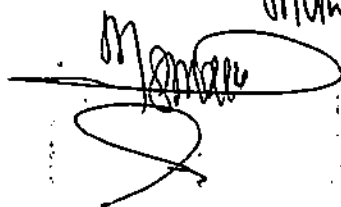
4

- F. That the Respondents acted in arbitrary and malafide manner, while illegally deducting the annual increment for the year 2014, and not releasing salaries for the month of June July and August 2014.
- G. That the Act and omission of the Respondents by illegally deducting annual increment for the year 2014, and not releasing of the monthly salaries for the month of June, July and August 2014, is nothing but depriving the appellant from the legal rights of livelihood.
- H. That the appellant seeks permission to advance other grounds and proofs evidence at the time of hearing and arguments.
- I. That other ground will be discussed at the time of arguments with prior permission of this Hon'ble Court.

IT IS THEREFORE HUMBLY PRAYED THAT, ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE INACTION OF THE RESPONDENTS BY NOT ALLOWING THE ANNUAL INCREMENT FOR THE YEAR 2014 AND NOT RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, AND NOT DECIDED THE DEPARTMENTAL APPEAL WITHIN STIPULATED PERIOD, THE RESPONDENTS MAY VERY KINDLY BE DIRECTED TO ALLOW THE INCREMENT FOR THE YEAR 2014 WITH ALL BACK BENIFITS AND ALSO RELEASE THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014. OR ANY OTHER REMEDY/RELIEF WHICH THIS HON'BLE COURT/TRIBUNAL DEEMS FIT AND APPROPRIATE MAY KINDLY ALSO BE AWARDED/PASSED IN FAVOUR OF APPELLANTS, AS THE SAME ISSUE AND QUESTION IN IDENTICAL NATURE CASE IN SERVICE APPEAL NO-7597 OF 2021 ALSO BEEN ALLOWED AND DECIDED ON DATED 06-11-2023 BY THIS HON'BLE COURT, And any other relief and remedy deems justified by this Hon'ble Tribunal may also be passed in favour of the appellant for the interest of justice.

APPELLANT 
Shah Muhammad

Through Counsel

 Muhammad Adroest

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

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SERVICE APPEAL NO _____/2024

Shah Muhammad S/O Khair Muhammad (SPST, BPS-14) Government Primary School
Shahbaz Khan Korona Shabqadar District Charsadda

VERSUS

The Director Education Khyber Pakhtun Khuwa Peshawar and others

Certificate.

It is certified that, no such like appeal has been file of pending on the subject matter between the parties before this Hon'ble Tribunal.

Appellant

Shah

Shah Muhammad

Through Counsel

Muhammad Ismail

Advocate

[Signature]

[Signature]

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR**

Service Appeal No. _____ / 2024

(6)

Shah Muhammad S/O Khair Muhammad (SPST, BPS-14) Government Primary School
Shahbaz Khan Korona Shabqadar District Charsadda

.....Appellant

VERSUS

1. The District Education Officer (Male) District Charsadda.
2. The Secretary Elementary and Secondary Education, KP Peshawar
3. The Director Education Directorate of Elementary and Secondary Education Peshawar
4. The SDEO Male Shabqadar District Charsadda.

.....Respondents

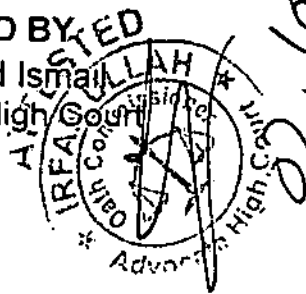
AFFIDAVIT

I, Shah Muhammad S/O Khair Muhammad (SPST, BPS-14) Government Primary School Shahbaz Khan Korona Shabqadar District Charsadda, do hereby solemnly affirm and states on oath that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

M. Ismail

Deponent *Shah*

IDENTIFIED BY:
Muhammad Ismail
Advocate High Court



Through counsel

Ismail Khan
Umar Khan
Amjid Khan Mohmand
Advocates High court Peshawar

Appointment Order PST (M) Ad hoc -Based

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

APPOINTMENT

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST School based/UC based in BPS-12 (Rs: 7000-500-22000) @Rs: 7000/= fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge :-

S.#	Name	School Name	U/C	Score
108/144	SIYAFI MUIHAMMAD 21407-4142405-3	GPS Yarjan Killi	Panjpao	114.36

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. They should not be handed over charge if they exceed 35 years or below 18 years of age.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO(concerned) Any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join their post within 10 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained..
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

Appointment Order PST (M) Ad hoc -Based

(A) / (8)


13. His appointment is made on School based, He will have to serve at the p. posting, and his service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

**(Siraj Muhammad)
District Education Officer
(Male) Charsadda**

Endst: No: 4807-4958 / Dated: Charsadda the. 31/5/2014

Copy forwarded for information and necessary action to the:-

1. Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Charsadda
3. District Accounts Officer Charsadda
4. SDEO (M) Charsadda
5. SDEO (M) Tangi
6. Official Concerned
7. M/File


**District Education Officer
(Male) Charsadda**

HEADMASTER
SBS
DUBLIN

31/05/2014

Handwritten notes in Urdu, possibly a signature or name.

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Change Report

(9)

(9)

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.

(10)

Name: SHAH MUHAMMAD

Race: AZGALAN

Residence: ISMAIL QILLA (DANT PAO) TEHSIL
SHARQADAR DISTRICT CHARBADDA

Father's name and residence: KHAIR MUHAMMAD ISMAIL QILLA
TEHSIL SHARQADAR DISTRICT CHARBADDA

Date of birth by Christian era as nearly as can be ascertained: 24-04-1988

Exact height by measurement: 5' 7"

Personal marks for identification: 21407-4142405-3

Left hand thumb and finger impression of (Non-Gazetted) officer:

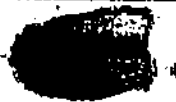
Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant:

[Handwritten Signature]

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

[Handwritten Signature]
ASDEO (M)
Sharqadar
Circle (Chd)

[Handwritten Signature]
S.D.E.O (M)
Charbadda

50
D.E.O (M)
Sharqadar
D.E.O (M)
Charbadda

~~11~~ 11

1	2	3	4	5	6		7	8
					Nature and duration of leave taken	Allocation of period of leave on average pay upto last month for which leave salary is debitible to another Government		
	Signature and Designation of the head of the office or other assessing officer in column 1 to 5	Date of termination or appointment	Reason of termination, such as promotion, transfer, dismissal, etc.	Signature of the head of the office or other assessing officer			Signature of the head of the office or other assessing officer	Reference to any record or order or prize of Government Service
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri	<i>[Signature]</i> 30/11/2018		<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri				
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri	30/11/2018		<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri				
<p>7-23687-17/18</p> <p>Regularization of services of Jamil Ahmad</p> <p>20/11/18</p>								
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri	30/11/2018		<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri				
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri	19/5/2018	Promotion to 0-14	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri				
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri	30/11/2018	A/Anc:	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadri				

NOTIFICATION
 (Appointment and regularization of the services) Act, 2017 (Khyber Pakhtunkhwa Act no.1 of 2018) and Elementary & Secondary Education Department Govt: of Khyber Pakhtunkhwa Notification No. SO(S/F) & SED/3-2/2018/SITT/ Contract dated Peshawar the 16/02/2018, services of the following (433) primary School Teachers appointed through NTS or Adhoc basis on contract w.e.f (31-05-2014 to 15-07-2017), are hereby regularized in JPS-12 on the same posts in Teaching cadre vide DEO (M) Chd Endst: No 19747-20188 dated 12-03-2018.

[Signature]
 Sub Divisional Education Officer (Male) Shabqadri

13

92	1560001	Mirza Ali Khan S/O Mehrez Khan	17101-014054-5	GPS Bakara No.1	122.60	Punjab	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
93	1560006	Shah Muhammad S/O Khair Muhammad	21407-4142405-3	GPS Yarnan Kili	114.36	Punjab	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
94	1560060	Akhter Ali S/O Ali Rehman	17101-0257749-3	GPS Angar Kor	104.92	Rajar-1	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
95	1560030	Abdul Musawir S/O Muhammad Ali	17101-3401857-5	GPS Angar Kor	132.1	Rajar-1	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
96	1561590	Qwasir Ullah S/O Faris Damar	17101-7120368-3	GPS Sulai Kamar	112.43	Rajar-1	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
97	1561728	Shah Ayaz Uddin S/O Saeeduddin	17101-0271844-3	GPS Rajar-1	107.35	Rajar-1	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
98	1560110	Tahir Ali Shah S/O Abdus Sattar	17101-8707068-5	GPS Shaikar Dhand	128.76	Rajar-2	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
99	1560229	Mansoor Ali S/O Imam Dha	17101-1819839-7	GPS Gujrano Kili	109.71	Rajar-4	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
100	1561100	Muhammad Basir S/O Akbar Sahar Khan	17101-1420857-7	GPS Wardaga-1	107.95	Rajar-2	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
101	1560667	Sadeeq Ullah S/O Tandeer Ullah	17101-6330758-7	GPS Kodai-2	96.2	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
102	1561304	Mustafa Zeb S/O Jehan Zeb	17101-4604519-5	GPS Mian Kili-2	93.93	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
103	1561686	Abdullah Khan S/O Iqbal Khan	17101-6427232-9	GPS Zrawar Khan Kor	87.29	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
104	1560216	Gul Raj Khan S/O Ata Khan	17101-4325646-3	GPS Banda Rashakai	118.53	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
105	1561135	Zahir Ullah S/O Mustan Shah	21407-8670864-5	GPS Banda Rashakai	117.43	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
106	2961492	Muhammad Sajjad S/O Toor Khan	17101-1895884-3	GPS Ghundar Kor	114.17	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
107	1563553	Khan Muhammad S/O Tariq Muhammad	17101-1059134-3	GPS Rashakai	107.21	Rashakai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
108	1560945	Karam Razi S/O Fakh Razzi	17101-0321458-5	GPS Ajoon Kili	127.52	Sarki Titara	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
109	1561732	Muhyiq Ahmad S/O Ghusara Muhammad	17101-2752491-3	GPS Rasool Khan Kili	104.92	Sarki Titara	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
110	1561235	Fawad Ahmad S/O Ahsan Ahmad	17101-0303540-3	GPS Jaha Kili-2	118.75	Sarki Titara	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
111	1560896	Inshad Ali S/O Hinaq Muhammad	17101-0991474-5	GPS Anwar Kili-1	120.61	Sarki Titara	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
112	2261021	Zain Ul Abideen S/O M.Zain Khan	17101-4689553-3	GPS Sarki Titara-1	112.05	Sarki Titara	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
113	1561340	Jamil Muhammad Khan S/O Haseer Muhammad	17101-0377280-9	GPS Haqdar Qalrai	111.2	Sarki Titara	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
114	2960941	Mustafa S/O Mustaqem	17107-9575020-9	GPS Chad	134.38	Shodan	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
115	1560800	Shahab Ali S/O Riaz Ali	17101-0874659-3	GPS D. Mukaram Khan	110.7	Tarnab	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
116	1561489	Mudassar Shah S/O Tehir Shah	17101-3598831-9	GPS Rizwan Abad	125.55	Turangtal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
117	1560171	Waqar Ali Shah S/O Tahir Shah	17101-7624422-5	GPS Umarzai-1	121.33	Umarzai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
118	1561401	Za Ullah S/O Jamil Zada	17101-7128195-1	GPS Inzar Qata	117.97	Turangtal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
119	1560092	Muhammad Yasir S/O Sami Ullah	17101-6371336-5	GPS Odigram	121.89	Umarzai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
120	1560176	Wasiq Jan S/O Shahard Gul	17101-6328961-3	GPS Umarzai-2	118.05	Umarzai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
121	1561702	Naeem Jan S/O Muhammad Rahman	17101-0332021-1	GPS Yakh Kohi	115.59	Umarzai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
122	1561805	Attullah Noor S/O Noorul Qamar	17101-5067018-7	GPS Zahoor Abad	113.3	Umarzai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
123	1561257	Atab Ahmad S/O Muhammad Islam	17101-9526663-5	GPS Chitla Dharai	109.25	Umarzai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
124	1561264	Saber Shah S/O Muhammad Zaman	17102-8126097-7	GPS Zuhra Gul	130.50	Zim	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017

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422	2031001233	Sayef Khan S/O Ali Akbar	17102-9394848-195	GPS Spinaal Temp	116.54	Shodag	20762-856 Dated:28/03/2017	08-04-17
423	2035001445	Nadeem Jan S/O Khan Bahader	17102-9394848-196	GPS Tarnab No 2	112.6	Tarnab	20762-856 Dated:28/03/2017	08-04-17
424	2031001073	Muhammad Ali S/O Zait Ullah Khan	17102-9394848-197	GPS Farnab No.1	111.76	Tarnab	20762-856 Dated:28/03/2017	08-04-17
425	2035001107	Mazhar Ali S/O Istikhar Ali	17102-9394848-198	GPS Umbarat No.1	134.95	Umbarat	20762-856 Dated:28/03/2017	08-04-17
426	201701521	Muhammad Zohaib S/O Muhammad Yousof	17102-9394848-199	GPS Onor Zardad No.1	112.95	Dheri Zardad	20762-856 Dated:28/03/2017	05-04-17
427	2032001361	Abdul Majid S/O Abdul Bari	17102-9394848-200	GPS Mubreen Koropara SKF	120	Massanara	27462-71 Dated:20/05/2017	22-05-17
428	2017000147	Irfan Ullah S/O Yousof Gul Mujeeb UF Rahman	17102-9394848-201	GPS No 1 Tatgi	120.14	MC- Tatgi	27462-71 Dated:20/05/2017	22-05-17
429	2017000186	(Disable Quota) S/O Zahid Ullah	17102-9394848-202	GPS No.1 Charsadda	121.32	MC-III Charsadda	27462-71 Dated:20/05/2017	22-05-17
430	202300325	Hazrat Ullah S/O Alamsale	17102-9394848-203	GPS Faraz Kili	106.74	KozBahramDheri	27530-34 Dated:23/05/2017	01-09-17
431	2033001129	Asif Ur Rehman(Disable Quota) S/O Gul Rehman	17102-9394848-204	GPS Dhakki	121.59	Dhakki	27547-51 Dated:23/05/2017	01-09-17
432	201700483	Syed Wilayat Shah S/O Syed Farah Siar Shah	17102-9394848-205	GPS Haidar Kili	109.59	Shodag	28873-76 Dated:15/07/2017	01-09-17
433	2031000963	Yahya Jan S/O Dilbar Khan	17102-9394848-206	GPS Mahmood Akurd	121.61	Chindradag	28877-80 Dated:15/07/2017	01-09-17

TERMS & CONDITIONS

- 1.) Their services shall be governed by the Khyber Pakhtunkhwa Civil servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011 and such rules & regulations as may be issued from time to time by the Government.
- 2.) Their services shall be considered regular and they shall be eligible for pension / dedication of GPF fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
- 3.) Their services are liable to termination on one month's notice from either side in case of resignation without notice, their one month's pay/allowances shall be forfeited to the Govt.
- 4.) They shall possess the same qualification and experience required for a regular post.
- 5.) Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
- 6.) The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or has been terminated from service and also not for those who are under disciplinary proceedings.
- 7.) Their pay shall be released subject to verification of academic documents/testimonial from the concerned Board/University by the SDEO concerned.
- 8.) The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the common content of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
- 9.) The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre.
- 10.) Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.

(SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) CHARSADEA

Enlist No: 19747-20188 F-203 (Regularization PST 2018) Dated: 12/03/2018

- Copy forwarded for information to the:-
1. Director E&SE Deptt. Khyber Pakhtunkhwa Peshawar.
 2. District Nazim Charsadda
 3. Deputy Commissioner Charsadda
 4. District Monitoring Officer IMU Charsadda
 5. SDEO (M) Charsadda
 6. SDEO (M) Temp
 7. SDEO (M) Shabqadar
 8. District Account Officer Charsadda.
 9. Official concerned.
 10. Office file.

12/03/2018

BY: DISTRICT EDUCATION OFFICER
(MALE) CHARSADEA

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) E&SE CHARSADDA**

☎ 091-9220481 ✉ emlcharsadda@yahoo.com

(15)

A.M.F

OFFICE ORDER

Consequent upon recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.2412-512 / Promotion / Estab Dated Peshawar the 21/01/2013, the following Primary School Teachers (BPS-12) are hereby promoted to the post of SPST (BES-14) (Rs.15190-1170-90280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government in Teaching cadre on the terms and conditions given below with immediate effect and further posted in the school noted against each.

Sl	NAME	PRESENT SCHOOL	POSTED AT	REMARKS
1	SHER MUHAMMAD KHAN	GPS GANDERI DALA	GPS PALAY DOBAND	A.V.P
2	IMTIAJ ULLAH	GPS AMBA DHERI NO.2	GPS AMBA DHERI NO.2	A.V.P
3	ASIM ALI KHAN	GPS CHEENA	GPS CHEENA	A.V.P
4	ZUBAIR	GPS PLA DHERAI	GPS PLA DHERAI	A.V.P
5	ADHAN	GPS KHULY	GPS KHULY	A.V.P
6	FAZAL NAWAN	GPS KHAT KILLI SHOLGARA	GPS KHAT KILLI SHOLGARA	A.V.P
7	ABID QAYUM	GPS MALIK ABAD	GPS MALIK ABAD	A.V.P
8	IFTIKHAR ULLAH	GPS MARCHAKI	GPS MARCHAKI	A.V.P
9	MUSLIM SHAH	GPS INAM KILLI	GPS LANDAI SHAH	A.V.P
10	MUHAMMAD YOUSAF	GPS KULA DHER NO.1	GPS KULA DHER NO.1	A.V.P
11	ASLAM KHAN	GPS KHORA ABAD	GPS KHORA ABAD	A.V.P
12	AQBITAR ALI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	A.V.P
13	KIZAM ULLAH	GPS ISLAM ABAD DARGAI	GPS ISLAM ABAD DARGAI	A.V.P
14	HADEM JAN	GPS KASS KOROONA	GPS KASS KOROONA	A.V.P
15	HASIR KHAN	GPS KHISRO KHAN KILLI	GPS SHAHNAWAZ KILLI	A.V.P
16	TILAWAT SHAH	GPS MANDEZAI	GPS MANDEZAI	A.V.P
17	MUHAMMAD KHALID	GPS STATION KOROONA	GPS GHULAM FARID KILLI	A.V.P
18	WAJID ULLAH	GPS PALOSA JADEED	GPS PALOSA JADEED	A.V.P
19	MUHAMMAD ISHTIAQ	GPS MERA SHAKH NO.8	GPS DEHLOLA	A.V.P
20	ABDUL MUSAWWI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	A.V.P
21	SHER ALI	GPS KANGRA	GPS KANGRA	A.V.P
22	SABIR SHAH	GPS ZUHRAB GUL KILLI NO.1	GPS ZUHRAB GUL KILLI NO.1	A.V.P
23	BHEHER GHAYAS KHAN	GPS PARAD NISATTA	GPS PARAD NISATTA	A.V.P
24	MUHAMMAD SHOAB	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	A.V.P
25	SHAHID KHAN	GPS MEAN SAHID GUL KILLI	GPS MEAN SAHID GUL KILLI	A.V.P
26	JAYYAD ALI	GPS KHUBAI	GPS KHUBAI	A.V.P
27	ZULFIKAR ALI	GPS CHAMYARAN	GPS CHAMYARAN	A.V.P
28	KAKAM ELANI	GPS AJOOH KILLI	GPS AJOOH KILLI	A.V.P
29	MUDASSIR SHAH	GPS RIZWAN ABAD	GPS RIZWAN ABAD	A.V.P
30	YASIR KHAN	GPS INAM KILLI	GPS INAM KILLI	A.V.P
31	ZUBAIR KHAN	GPS SHANBAZ KHAN	GPS SHANBAZ KHAN	A.V.P

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32	FAZAL AMIN	GPS EWAS KILLI	GPS EWAS KILLI	A.V.P
33	ISHTIAQ AHMAD	GPS RASOOL KHAN KILLI	GPS RASOOL KHAN KILLI	A.V.P
34	MURAD ALI	GPS PAINDA KHEL TARNAB	GPS PAINDA KHEL TARNAB	A.V.P
35	MUHAMMAD FARANQ	GPS SHEKH MUNAF KILLI	GPS SHEKH MUNAF KILLI	A.V.P
36	ANWAR ZEB	GPS INZAR KILLI	GPS INZAR KILLI	A.V.P
37	SHAH ANWAR	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	A.V.P
38	KHALIL ULLAH	GPS UTMANZAI NO.3	GPS UTMANZAI NO.3	A.V.P
39	NOOR ULLAH JAN	GPS GHURMBAK- NO.1	GPS GHURMBAK- NO.1	A.V.P
40	MUHAMMAD ISMAIL SHAHID	GPS TANGI NO.3	GPS TANGI NO.3	A.V.P
41	MUHAMMAD IZHAR	GPS HASSANZAI	GPS HASSANZAI	A.V.P
42	SHAH AHMAD	GPS KARIMO BANDA	GPS CHAKOOR	A.V.P
43	MIRZA ALI KHAN	GPS DALAZAK NO.1	GPS DALAZAK NO.1	A.V.P
44	ROSHAN KHAN	GPS ALI JAN KILLI	GPS ALI JAN KILLI	A.V.P
45	MOAZAM JAN	GPS QAZI KHEL-2	GPS QAZI KHEL-2	A.V.P
46	BAQIT TAJ GUL	GPS DHERAI KOR: KATOZAI	GPS DHERAI KOR: KATOZAI	A.V.P
47	REHMAN ULLAH	GPS OCHA WALA-NO.1	GPS OCHA WALA-NO.1	A.V.P
48	ANROOZ KHAN	GPS LANDI ROAD	GPS LANDI ROAD	A.V.P
49	ADNAN HUSSAIN	GPS GONDA	GPS GONDA	A.V.P
50	MUHAMMAD YASIR	GPS ODIGRAM	GPS ODIGRAM	A.V.P
51	IMAMUL HASSAN	GPS KULA DHER NO.1	GPS KULA DHER NO.1	A.V.P
52	UMAR GUL	GPS AZIZ ABAD NO.2	GPS AZIZ ABAD NO.2	A.V.P
53	SHAH AYAZ UDDIN	GPS RAJAR NO.1	GPS RAJAR NO.1	A.V.P
54	MUHAMMAD ASBI	GPS KOTAK	GPS KOTAK	A.V.P
55	WAQAR ALI SHAH	GPS UMARZAI NO.1	GPS UMARZAI NO.1	A.V.P
56	MARJAN ALI	GPS SHADRA NO.1	GPS SHADRA NO.1	A.V.P
57	KASHEEM KHAN	GPS MIRZAI	GPS MIRZAI	A.V.P
58	ZIA RAFIQ	GPS KATOZAI NO.1	GPS KATOZAI NO.3	A.V.P
59	SHAHID ALI	GPS OIL DAR GARHI	GPS CHEENA	A.V.P
60	IRSHAD ALI	GPS QALARY	GPS QALARY	A.V.P
61	MAJID KHAN	GPS ARAT KORDONA	GPS ARAT KORDONA	A.V.P
62	SHAH KHALID	GPS MATHRA QADEEM	GPS MATHRA QADEEM	A.V.P
63	MUKHTAR ULLAH	GPS ISLAM ABAD DOBANDI	GPS ISLAM ABAD DOBANDI	A.V.P
64	TAMIR ALI SHAH	GPS SHAKAR DHAND	GPS HIKMAT ABAD	A.V.P
65	WASIQ JAN	GPS UMARZAI- NO.2	GPS UMARZAI- NO.2	A.V.P
66	GUL RAJ KHAN	GPS KODAI NO.1	GPS KODAI NO.1	A.V.P
67	MUHAMMAD ALI	GPS NAHADI	GPS NAHADI	A.V.P
68	QAISAR ALI	GPS MUHAMMAD NARI	GPS MUHAMMAD NARI	A.V.P
69	IRFAN ULLAH	GPS ZARIN ABAD	GPS ZARIN ABAD	AVP
70	YOUSAF KHAN	GPS RUSTAM KHAN KILLI	GPS RUSTAM KHAN KILLI	A.V.P
71	MUHAMMAD DAWOOD KHAN	GPS TANGI NO.1	GPS TANGI NO.1	A.V.P
72	FAWAD AHMAD	GPS JALAL KILLI-2	GPS JALAL KILLI-2	A.V.P
73	SHAHID KHAN	GPS SHAH AFZAL ABAD	GPS SHAH AFZAL ABAD	A.V.P
74	ALAN ZEB KHAN	GPS RAJI ABAD UMARZAI	GPS RAJI ABAD UMARZAI	A.V.P
75	ALI GOUMAR	GPS MEHMOOD ABAD SKF	GPS MEHMOOD ABAD SKF	A.V.P
76	ZAKIR ULLAH	GPS KODAI NO.1	GPS KODAI NO.1	AVP

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77	JAWAD MUHAMMAD	GPS SHAH DHAND	GPS SHAH DHAND	AVP
78	MOMAN ALI	GPS DHERI ABAD TAJAN	GPS DHERI ABAD TAJAN	AVP
79	VIQAR KHAN	GPS MALKA DHER	GPS MALKA DHER	AVP
80	FATHUL AMIN	GPS DHERI SIKANDER KHAN	GPS DHERI SIKANDER KHAN	AVP
81	MIRAN ADR. SHAH	GPS AGRA BALA	GPS AGRA BALA	AVP
82	IKRAM UL HAQ	GPS AMBA DHER NO.1	GPS AMBA DHER NO.1	AVP
83	ZAFAR ALI	GPS BOSA KHEL PRANG	GPS BOSA KHEL PRANG	AVP
84	ASIF SHAH	GPS SHALWANO KILLI	GPS SHALWANO KILLI	AVP
85	SHAD MUHAMMAD	GPS MARYANA	GPS MARYANA	AVP
86	HAEEM JAH	GPS YARI KILLI	GPS YARI KILLI	AVP
87	MUHAMMAD SHAHZAD KHAN	GPS KASS KOROONA	GPS KASS KOROONA	AVP
88	AZMAT HULJAF	GPS MARCHAK-2	GPS MARCHAK-2	AVP
89	SHAH ULLAH ALIAS ASAD	GPS UMAR ABAD CHD	GPS UMAR ABAD CHD	AVP
90	ARSHAD KHAN	GPS KOTAK	GPS KOTAK	AVP
91	MUHAMMAD ZEESHAN	GPS KHAT KILLI PRANG	GPS KHAT KILLI PRANG	AVP
92	KAMRAN ULLAH	GPS MALKA DHER	GPS MALKA DHER	AVP
93	HASDOL SHAH	GPS PRANG- NO.3	GPS PRANG- NO.3	AVP
94	MUHAMMAD AMIN	GPS AGRA BALA	GPS AGRA BALA	AVP
95	SHAH MUHAMMAD	GPS YARI JAN KOROONA	GPS YARI JAN KOROONA	AVP
96	ABDUR RAHMAN	GPS JAN ABAD	GPS JAN ABAD	AVP
97	SAEED KHAN	GPS MITTA MUGHAL KHEL	GPS MITTA MUGHAL KHEL	AVP
98	ASIF ULLAH	GPS DAULAT PURA	GPS GAGER	AVP
99	MUHAMMAD SAJJAD	GPS CHUNDA KOROONA	GPS CHUNDA KOROONA	AVP
100	ORAWAR SHAH	GPS BOSA KHEL PRANG	GPS BOSA KHEL PRANG	AVP
101	ISHFAQ AHMAD	GPS MAX SAHIL GUL QALA	GPS ULTIAR GARGH	AVP
102	ROOHUL ABID	GPS DAGSHAMOZAI	GPS DAGSHAMOZAI	AVP
103	ATA ULLAH NOOR	GPS NISWAN ABAD	GPS NISWAN ABAD	AVP
104	ZIR ULLAH	GPS INZER QALA	GPS INZER QALA	AVP
105	YASIR KHAN	GPS MANDANI	GPS MANDANI	AVP
106	HAZIR AHMAD	GPS MARCHAND NO.1	GPS MARCHAND NO.1	AVP
107	SHAH UL HAN	GPS SULA FAKAR	GPS SULA FAKAR	AVP
108	ZAHIR AKBREEN	GPS SARKI TITARA-NO.1	GPS SARKI TITARA-NO.1	AVP
109	JAMIL MUHAMMAD KHAN	GPS TARIQ ABAD	GPS TARIQ ABAD	AVP
110	MUHAMMAD GUL ZAF	GPS SHAH DHAND	GPS SHAH DHAND	AVP
111	SHEHRI ALI	GPS GARGH	GPS GARGH	AVP
112	MANZOOR ALI	GPS GURJANO KILLI	GPS GURJANO KILLI	AVP
113	MAJID SHAH	GPS RHMAT ULLAH KOROONA	GPS RHMAT ULLAH KOROONA	AVP
114	AFTAB AHMAD	GPS CHITLA DHERI	GPS HAJI ABAD UMARZAI	AVP
115	ASRANVIYAR	GPS PRANG- NO.3	GPS PRANG- NO.3	AVP
116	ZAKHOOR AHMAD	GPS SHERPAD NO.1	GPS SHERPAD NO.1	AVP
117	FARHAD ALI	GPS KATIGAN	GPS KATIGAN	AVP
118	MUHAMMAD BASIR	GPS WARDAGA- NO.1	GPS WARDAGA- NO.1	AVP
119	ADRAM KHAN	GPS SHEKH KOROONA	GPS SHEKH KOROONA	AVP
120	MUHAMMAD	GPS RASHAKAI	GPS RASHAKAI	AVP
121	AMIR ALI	GPS DARGAI	GPS DARGAI	AVP

122	WISAL AHMAD	GPS HASSAN GUL KOROONA	GPS HASSAN GUL KOROONA	A.V.P
123	RAHAM SHID KHAN	GPS KRAPA MUHAMMD KHAN	GPS KRAPA MUHAMMD KHAN	A.V.P
124	SHAMSUL HAQ	GPS BAZ MIAN KILLI	GPS BAZ MIAN KILLI	A.V.P
125	SHERBAZ KHAN	GPS SPINKAI NO.2	GPS SPINKAI NO.2	A.V.P
126	SYED ZIAUDDIN BAD SHAH	GPS DARYAB KORDONA	GPS DARYAB KORDONA	A.V.P
127	DAWOOD MASOOD	GPS KALYAS	GPS KALYAS	A.V.P
128	MUHAMMAD ADIL JAN	GPS BOSA KHFL. NO.2	GPS BOSA KHFL. NO.2	A.V.P
129	NUSRAT ALI	GPS ISLAM ABA CHD	GPS ISLAM ABA CHD	A.V.P
130	MOHIB ULLAH	GPS ATTAKI NO.2	GPS ATTAKI NO.2	A.V.P
131	SAYYED MASOOD AHMAD	GPS ATTAKI NO.2	GPS ATTAKI NO.2	A.V.P
132	HAZ ALI KHAN	GPS ATTAKI NO.3	GPS ATTAKI NO.3	A.V.P
133	ZAFAR KHAN	GPS SHABQADAR FORT	GPS SHABQADAR FORT	A.V.P
134	ABDUR RFI JAN	GPS SADAR GARIH NO.3	GPS SADAR GARIH NO.3	A.V.P
135	TARIQ JAN	GPS ATTAKI NO.3	GPS ATTAKI NO.3	A.V.P
136	ZAKEER ABBAS	GPS SARDAR CAHRI	GPS SARDAR CAHRI	A.V.P
137	SUDEEQ ULLAH	GPS KODAI NO.2	GPS KODAI NO.2	A.V.P
138	IRSAN ALI	GPS ATTAKI NO.3	GPS ATTAKI NO.3	A.V.P
139	MUSTAFA ZEB	GPS MIAN KILLI	GPS MIAN KILLI	A.V.P
140	ABDULLAH KHAN	GPS ZARWAR KHAN KOR	GPS ZARWAR KHAN KOR	A.V.P
141	HAZ MUHAMMAD	GPS MATHRA NEW	GPS MATHRA NEW	A.V.P
142	NOOR-UL-ISLAM	GPS DARGAI	GPS DARGAI	A.V.P
143	MEER ALAM	GPS HAMISH GUL KILLI	GPS HAMISH GUL KILLI	A.V.P
144	TRIA MUHAMMAD	GPS HAMISH GUL KILLI	GPS HAMISH GUL KILLI	A.V.P
145	SHAH SAUD	GPS SHEKHANO KOROONA	GPS SHEKHANO KOROONA	A.V.P
146	SAJID ZOR KHAN	GPS AKHONZADGON	GPS AKHONZADGON	A.V.P
147	UBAID ULLAH JAN BACHA	GPS PRANG NO.3	GPS PRANG NO.3	A.V.P
148	NIHAR AHMAD	GPS KHAT KILLI PRANG	GPS KHAT KILLI PRANG	A.V.P
149	IHSAN MUHAMMAD	GPS KODAI SARDARYAB	GPS KODAI SARDARYAB	A.V.P
150	MAZULLAH KHAN	GPS HASSAN ABAD	GPS HASSAN ABAD	A.V.P
151	MAGSOOD JAN	GPS GUL ABAD MERA	GPS GUL ABAD MERA	A.V.P
152	MUHAMMAD FARDOQ	GPS ZAHID ABAD	GPS ZAHID ABAD	A.V.P
153	MUHAMMAD SHOAB	GPS ABAZAI	GPS ABAZAI	A.V.P
154	JAUHAR UDDIN	GPS MUSLIM ABAD	GPS MUSLIM ABAD	A.V.P
155	INAYATUR RAHMAN	GPS HASSAN ABAD	GPS HASSAN ABAD	A.V.P
156	JEHAN ZEB KHAN	GPS CIANCHAND KHAT	GPS CIANCHAND KHAT	A.V.P
157	KASHIF KHAN	GPS GANJI DAG NO.1	GPS GANJI DAG NO.1	A.V.P
158	SAHI RAHMAN	GPS LANDI SHAH	GPS LANDI SHAH	A.V.P
159	GULAB NOOR	GPS QAZI SERAI	GPS GANDHERI PAYAN NO.2	A.V.P
160	ANWAR UL HAQ	GPS STARHAB SKF	GPS STARHAB SKF	A.V.P
161	HIMAYAT ULLAH	GPS DAMAN BATTAGRAM	GPS DAMAN BATTAGRAM	A.V.P

TERMS & CONDITIONS:

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period, in case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.

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- 6. No TA/DA is allowed for joining their duty.
- 7. They will give an undertaking to this effect to be recorded in their service books.
- 8. No application for any change regarding Posting/Transfer shall be entertained.

ADJUSTMENT

Adjustment/transfer of the following teachers is also hereby ordered on their own pay & scale in the schools mentioned against each in the interest of public service with immediate effect.

S.NO.	NAME & DESIGNATION	PRESENT SCHOOL	POSTED AT	REMARKS
1	Riaz Ali SPST	GPS Kaco Korona	GPS Tala Shah	Single teacher school
2	Khurshid Alam SPST	GPS Gul Shah Killi	GPS Bari Band	Adjusted being 4/plus
3	Jawad Khan SPST	GPS Kagan	GPS Sado Bari Band	Adjusted being 4/plus
4	Abdul Bari Jan SPST	GPS Ghulam Farid Killi	GPS No.1 Sedar Garhai	N.Basis
5	Muhammad Sajjad SPST	GPS Ghulam Korona	GPS Banda Rashedul	Adjusted being 4/plus
6	Munim Khan SPST	GPS Mirza Dher No.1	GPS Harozai	N.Basis
7	Dahur Rahman SPST	GPS Rafi Ullah Korona	GPS Bachyano Killi	N.Basis
8	Asif Ali FST	GPS Landi Shah	GPS Aral Korona	Being disabled
9	Zahir Ullah SPST	GPS Shabara No.1	GPS Sukkar	N.Basis
10	Muhammad Zabeer FST	GPS Shah Nawaz Killi	GPS Fehola Bah	N.Basis
11	Asif ur Rahman SPST	GPS Azim Gul Mian Killi	GPS Saif Abad	N.Basis
12	Husnab Akhtar SPST	GPS Khan Kbel	GPS Gonda	N.Basis
13	Shah Jehan FST	GPS Pitmorai Dera	GPS Sheikh Killi	N.Basis
14	Abdur Rehman SPST	GPS Bhalder Killi No.2	GPS Garhi Hameed Gul	N.Basis

NOTE:-

- * No TA, DA is allowed
- * Charge report should be submitted to all concerned

(JEHANGIR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

Endst: No. 5420-5602 / F.No. (Promotion 2020) / Dated 19/05/2020

- 1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner Charsadda.
- 3. District Accounts Officer Charsadda.
- 4. District Monitoring Officer (TMU) Charsadda.
- 5. Sub-Divisional Education Officer (Male) Charsadda.
- 6. Sub-Divisional Education Officer (Male) Yangi.
- 7. Sub-Divisional Education Officer (Male) Shabqadar.
- 8. Official concerned.
- 9. Office file.

(Signature)
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

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THE DISTRICT EDUCATION OFFICER (MALE)
District Charsadda.

Subject: APPLICATION FOR THE GRANT OF INCREMENT FOR THE YEAR 2014 AND SALARIES FOR THE MONTHS OF JUNE, JULY & AUGUST 2014.

Respected/Sir,

Most respectfully, it is stated that I am working under your kind control in District Charsadda. I was appointed as PST (BPS-12) vide order Endst No. 4807-4958 dated 31-05-2014. After performing duty for sufficient time my service was regularized with the promulgation of the Act of 2017.

While our official service commencement date was 31/05/2014, the government began issuing our salaries from 01/09/2014, and according to the said salary our increment for the year 2014 was not allowed to me.

Furthermore, I wish to highlight a recent development within our department wherein one of my colleagues namely Abdul Musawir successfully pursued legal action and approached Khyber Pakhtunkhwa Service Tribunal Peshawar to rectify this issue and his case was graciously allowed. As a result, the department issued the petitioner with all withheld salaries and corresponding increments in alignment with initial appointment date.

In the light of this precedent and the principle of equal treatment for all employees, I am respectfully requesting that the department extends the same consideration to me as the said petitioner and I have been appointed with the same Endst Number and on same date, May 31, 2014.

In this respect, it is therefore requested that salaries for the months of June, July & August 2014 and increment for the year 2014 may kindly be allowed to me in line with the principles of justice and fairness, please.

Thank you for your time and consideration.

Obediently Yours

Name: SHAH MUHAMMAD

Designation: SPST

School: GPS Shahbaz Khan Keronq.

Contact No: 0333-3530205

Signature: [Signature]

Date: 20/04/2024

(20)

~~(20)~~

~~Handwritten signature~~

Office of the Sub Divisional Education Officer
(Male) Shabqadar Charsadda

sdeopri@gmail.com

Dated 22/4/2024

No. 10021,

To

The District Education Officer
(Male) Charsadda

SUBJECT: APPLICATION FOR THE GRNAT OF INCREMENT FOR THE YEAR
2014 AND SALARIES FOR THE MONTHS OF JUNE, JULY & AGUST
2014

Memo:

Enclosed please find herewith a self-explanatory applications along with other relevant documents of the following officials is submitted for your kind perusal and necessary action please.


Ser #	Name of Official	Designation	School Name
1	Tariq Jan	SPST	GPS No,3 Attaki
2	Sherbaz Khan	SPST	GPS, Hassanzai Shabqadar
3	Syed Zaheer Abbas	SPST	GPS Spinkai No,1 Shabqadar
4	Abdur Rafi Jan	SPST	GPS Katozai No.2.
5	Rahm Shid Khan	SPST	GPS.Krapa Muhmmad Khan
6	Zia Rafiq	SPST	GPS, Katozai No.3.
7	Naseem Khan	SPST	GPS Mir Zai
8	Zubair Khan	SPST	GPS Shahbaz Khan Kor
9	Mustafa Zeb	SPST	GPS, Mlan killi Shabqadar
10	Gul Raj Khan	SPST	GPS, Kodai No .1
11	Sadeeq Ullah	SPST	GPS, Kodai No,2
12	Muhammad Sajjad	SPST	GPS, Banda Rashakai
13	Khan Muhammad.	SPST	GPS, Rashaki
14	Zakir Ullah	SPST	GPS, No1,Kodai
15	Shah Muhammad	SPST	GPS Shabaz Khan Killi



Office of the Sub Divisional Education Officer
(Male) Shabqadar Charsadda

16	Ihsan Ali	SPST	GPS,
17	Muhammad Izhar	SPST	GPS, Hassanzai
18	Asif ullah	SPST	GPS, Sandasar
19	Fathul Amin	SPST	GPS, Haryana
20	Tilawat Shah	SPST	GPS, No1, Sohta
21	Muhammad Asim	SPST	GPS Haji AbadSreekh
22	Shah Khalid	SPST	GPS, Haji AbadSreekh
23	Syed Masood Ahmad	SPST	GPS,NO2 Attaki
24	Mohibullah	SPST	GPS.NO 2. Attaki
25	Bakht Taj Gul	SPST	GPS Kabaley Shabqadar
26	Syed Ziauddin Badshah	SPST	GPS Daryab Korona
27	Seeed Khan	SPST	GPS Matta Mughal Khel
28	Wasal Ahmad SPST	SPST	Hassan Gul Korona
29	Sher Ali	SPST	GPS Kangra Nahaqqi
30	Muhammad Shoaib	SPST	GPS Ashara Battagram
31	Arshad Khan	SPST	GPS, Kotak
32	Adnan Hussain	SPST	GPS, Gonda

Incl. As Above


Sub Divisional Education Officer
(Male) Shabqadar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 7597 /2021

ABDUL MUSAWIR

V/S

EDUCATION DEPT

I N D E X

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal		1-5
2.	Appointment Order dated 31.05.2014	A	6-7
3.	Charge Report dated 31.05.2014	B	8
4.	Attendance Register	C	9
5.	Service Book	D	10-17
6.	Pay Rolls	E	18-19
7.	Departmental Appeal dated 09.07.2021	F	20
8.	Appellate Order Dated 16.09.2021	G	21
9.	Wakalatnama		22

APPELLANT

Through:



MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
KHATTAK LAW ASSOCIATES,
Juma Khan Plaza, Warsak Raod, Peshawar
0333-9313113, 0345-9090737
muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 7597 /2021

ABDUL MUSAWIR s/o Muhammad Ali, SPST (BPS-14),
Govt. Primary School, Angar Kali, Charsadda,
r/o Amir Abad, PO Rajjar, Tehsil & District Charsadda.

APPELLANT

VERSUS

1. THE DIRECTOR EDUCATION, Khyber Pakhtunkhwa,
near Govt. Hasnain Shaheed High School, Firdous, Peshawar.
2. THE DISTRICT EDUCATION OFFICER,
District Charsadda.
3. THE ACCOUNTANT GENERAL, KHYBER PAKHTUNKHWA,
Fort Road, Peshawar Cantt.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE INACTION OF THE RESPONDENTS BY NOT
ALLOWING INCREMENT FOR THE YEAR 2014 & ALSO NO
RELEASING OUTSTANDING SALARIES FOR THE MONTH
OF THE JUNE, JULY & AUGUST 2014 AND AGAINST
APPELLATE ORDER DATED 16-09-2021 (Communicated to the
appellant through register post on 21-09-2021) WHEREBY THE
DEPARTMENTAL APPEAL DATED 09-07-2021 OF THE
APPELLANT WAS REGRETTED ON NO GOOD GROUNDS

PRAYER:

That on acceptance of the instant service appeal the inaction
of the respondents by not allowing the annual increment for
the year 2014 and not releasing outstanding salaries for the
month of June, July & August 2014 may very kindly be
declared illegal and the respondents may kindly be directed
to allowing increment for the year 2014 with all back benefits
and also release the outstanding salaries for the month of
June, July & August 2014. Any other remedy which this
august Tribunal deems appropriate that may also be awarded
in favor of the appellant.

Respectfully Sheroeth,

FACTS:

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

TESTED

30/7/21

1. That appellant is the employee of the respondent Department and was initially appointed as Primary School Teacher (PST) (BPS-12) on adhoc basis after fulfilling all the legal and codal formalities required for the post vide order dated 31-05-2014.

Copy of Appointment Order dated 31.05.2014 is attached as Annexure

2. That the appellant after receiving the appointment order dated 31-05-2014 submitted his arrival report and took over the charge of the post assigned in the appointment order on 31-05-2014 and made entry in the attendance register of the school since then the appellant is working quite efficiently, whole heartedly with full devotion and upto the entire satisfaction of his high ups.

Copy of Charge Report dated 31.05.2014 & Attendance Register is attached as Annexure

3. That service book of the appellant was also prepared and necessary entry was made therein in the service book from the date of initial appointment till date.

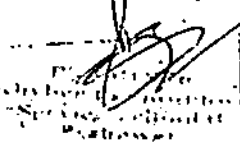
Copy of Service Book are attached as Annexure



4. That service of all the adhoc teachers were regularized vide Regularization Act of 2017 and accordingly the services of the appellant was also regularized from the date of appointment vide order dated 12-03-2018, the entry of which was properly incorporated on page 7 of the service book already annexed above as annexure-D.

5. That presently the appellant is working as Senior Primary School Teacher (BPS-14) as in the year 2020 the appellant is promoted from the post of Primary School Teacher (BPS-12) to the post of Senior Primary School Teacher (BPS-14) vide order dated 19-05-2020 at serial no. 20, the entry of which has also been made in the service book on page 09 of the service book attached at annexure-D.

6. That appellant was facing huge discrepancy in the monthly salary due the reason that increment for the year 2014 was not allowed and the salaries for the month of June, July & August 2014 was not released for which the appellant made several request before the respondents by knocking the doors of various forum and accordingly the fixation party of

WITNESSED


Name of the witness
Designation of the witness

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Respondent no. 3 allowed the increment for the year 2014 but till date the same is neither been included nor been allowed in the salary of the appellant.

Copy of Pay Rolls are attached as Annexure E

7. That the appellant feeling aggrieved from the inaction of the respondents by not allowing increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014, the appellant file Departmental Appeal dated 09-07-2021 before the competent authority which was rejected vide appellate order dated 16-09-2021 on no good ground and the same is communicated to the appellant through registered post on 21-09-2021.

Copy of Departmental Appeal dated 09.07.2021 & Appellate Order Dated 16.09.2021 is attached as Annexure F & C

8. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others:

GROUND:

- A. That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of Law and is liable to be struck down.
- B. That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C. That the appellant has properly submitted his charge report & made attendance in the attendance register of the school on 31-05-2014 and as such the appellant has spent 180 days on 01st December that entitles the appellant for the annual increment of the year 2014.
- D. That act of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly

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salary for the month of June, July & August 2014 is against the prevailing Law & Rules.

- E- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which: *"the state is bound to eliminate disparity in the income and earnings of individuals including persons in the various service of Pakistan."* thus in light of the above the respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July & August 2014.
- F- That, the respondents acted in arbitrary and malafide manner while illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014.
- G- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is nothing but depriving the appellant from legal right of livelihood.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.


It is therefore, most humbly prayed that appeal of the appellant may be accepted as prayed for.

Dated: 15-10-2021

APPELLANT


ABDUL MUSAWIR

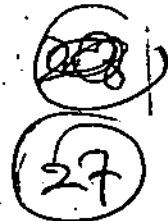
Through:


MUHAMMAD MAAZ MADNI
Advocate High Court, Peshawar

CERTIFICATE


No. such like appeal has been filed or pending on the subject matter between the parties before this Honourable Tribunal.


ADVOCATE



AFFIDAVIT

I, Mr. ABDUL MUSAWIR s/o Muhammad Ali, do hereby solemnly affirm on oath that 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.


DEPONENT
17101-3401857-5

NOTE:

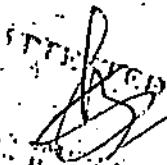
Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.


ADVOCATE

LIST OF BOOKS:

- 1. Constitution of Pakistan, 1973.
- 2. Service Laws
- 3. Other relevant case Laws





KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7597/2021

BEFORE: MRS. RASHIDA BANO
MR. MUHAMMAD AKBAR KHAN

MEMBER (J)
MEMBER (E)

Abdul Musawair S/O Muhammad Ali, SPST, BPS-14, GPS Anar Kali,
Charsadda, R/O Amir Abad, P.O Rajjar, Tehsil & District Charsadda
(Appellant)

VERSUS

1. The Director Elemer : Secondary Education Department, Peshawar.
2. The District Education Officer (M), Charsadda.
3. The Accountant General, Khyber Pakhtunkhwa, Peshawar Cant.
(Respondents)

Mr. Muhammad Maaz Madani
Advocate

For appellant.

Mr. Muhammad Jan
District Attorney

For respondents

Date of Institution..... 15.10.2021
Date of Hearing..... 06.11.2023
Date of Decision..... 06.11.2023

JUDGMENT

RASHIDA BANO, MEMBER (J): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

"On acceptance of this appeal, the inaction of the respondents by not allowing the annual increment for the year 2014 and releasing outstanding salaries for the month of June, July & August 2014 may very kindly be declared illegal and the respondents may kindly be directed and also release the outstanding salaries for the months of June, July & August 2014."

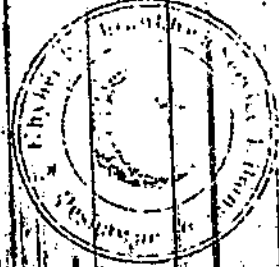
2. Brief facts of the case, as given in the memorandum of appeal, are that appellant was initially appointed as Primary School Teacher (BPS-12) on adhoc basis vide order dated 31.05.2014. Later on services of the appellant was regularized in the year 2017 from the date of his appointment. He was promoted

WITNESSED

SECRETARY
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

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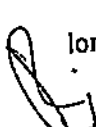


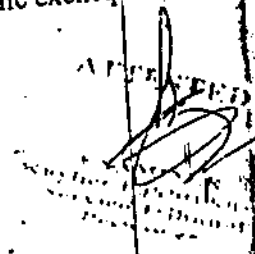
to the post of Senior Primary School Teacher (BPS-14) vide order dated 12.03.2018. The appellant facing huge discrepancy in the monthly salary due the reason that increment for the year 2014 was not allowed and the salaries for the month of June, July and August 2014 was not released. Despite the factum of pay fixation party of respondent No.3 allowed the increment for the year 2014 but till date the same is neither been included nor been allowed in the salary of the appellant. Feeling aggrieved, he filed departmental appeal, which was rejected, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that appellant has not been treated in accordance with law and rules and respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973. He further argued that the act and omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing salaries is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of law is liable to be struck down. He submitted that appellant has properly submitted his charge report and mark his attendance in the attendance register on 31.05.2014 and he is held entitled for annual increment for the year 2014.

5. Learned District Attorney contended that the appellant has been treated in accordance with law and rules. He further contended that initially the appellant was appointed on 31.05.2014, but the appointment order of the appellant and his colleagues were amended and in this regard a corrigendum was issued. The amended order directed the appointees to take charge from 01.09.2014, because of long summer vacations to save the public exchequer.








6. Perusal of record reveals that appellant was appointed as Primary School Teacher vide appointment order dated 31.05.2014 and it is admitted fact that appellant submitted his arrival report on the same day i.e 31.05.2014. He was regularized from the date of his appointment vide notification dated 15.03.2018. According to the terms and conditions as mentioned in the appointment order of the appellant, he could draw his pay with effect from 01.09.2014, however in view of section 17 of Civil Servants Act, 1973 and FR17 the appellant is entitled for the payment of his salaries with effect from 31.05.2014, the date on which he submitted his arrival report. The appellant is thus entitled to receive salary for the months of June, July and August 2014. Moreover, while counting their service from 31.05.2014, six months service period as required for grant of annual increment stood completed and the appellant is also held entitled for the annual increment of 2014. So far as the question of limitation is concerned, suffice it is stated that being a financial matter, the appellant is having a continual cause of action, therefore, limitation will not have any adverse implication on the claim of the appellant.


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7. For what has been discussed above, the appeal in hand is allowed as prayed for and the appellant is held entitled to all back benefits. Costs shall follow the events. Consign.

8. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 6th day of November, 2023.


(MUHAMMAD AKBAR KHAN)
Member (E)


(RASHIDA BANO)
Member (J)


30/7/24


Date of Presentation of Application 30/7/24
 Number of Pages 72
 Copy Fee 35/-
 Name 9/-
 Date of 110/-
 Date of 30/7/24
 Date of 30/7/24

ORDER
06.11.2023

1. Learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney for the respondents present.

2. Vide our detailed judgement of today placed on file, the appeal in hand is allowed as prayed for and the appellant is held entitled to all back benefits. Costs shall follow the event. Consigned.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 6th day of November, 2023.*


(Muhammad Akbar Khan)
Member (E)


(Rashida Bano)
Member (J)

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To

The Director Education

Elementary and Secondary Education KP Peshawar.

Departmental Appeal

- i. The Appellants are the employee of the education Department, and were Initially appointed as Primary School Teacher PST BPS-12 on ADHOC Basis after fulfilling all the legal and codal formalities required for the post under the law and Rules Regulation.
- ii. Appellants after scrutiny and through proper channel by the Departmental Selection Committee DSC Under the supervision of DEO Male and other respected members of the committee appointed the appellants as primary school teacher PST BPS-12 on dated 31-05-2014. (Copies of Appointment Order dated 31-05-2014 is attached)
- iii. the DEO has Issued the appointments orders for the post of PST to all candidates , and when all the candidates received the appointment orders on dated 31-05-2014, they submitted their arrival reports and took over Charge reports of the PST Posts assigned in the appointments orders on dated 31-05-2014. and made entry in the Attendance Register in the respective quarters school, since then the appellant working with full zeal and according to the efficiency and with full devotion satisfaction of the School Head.
(Copies of Charge Reports dated 31-05-2014 and Register Attached)
- iv. Service Book of the Appellants also prepared and necessary entries were made therein in the service books from the date of initial appointments till date.
(Copies of Service Books are attached)
- v. after satisfactory duties of all the Adhoc Teachers, the Govt of Kp through Regularization Act 2017 including appellant in the year 2018 all were regularized from the date of their initial appointments orders i.e 31-05-2014. The date which is 31-05-2014 is also mentioned in the heading of the regularization order of the Appellant as well as other candidates of PST, and the appellants were placed at Serial No-93. (Copy of Regularization Order attached)
- vi. Thereafter the appellant also promoted from the Post of PST BPS-12 to post of Senior Primary School Teacher SPST BPS-14 by the Departmental Promotion Committee DPC under the supervision of DEO and other officials, Vide order dated 19-05-2020.
(Copy of Promotion orders attached)
- vii. the appellant facing huge financial discrepancy in monthly salaries due to the reasons that increment for the year 2014 were not allowed and also the salaries for month of June July and August 2014 not released for which the appellants made several visits and request verbally as well in shape of applications appeals etc. (Copies of application and appeals)
- viii. At last the SDEO Shabqadar send one letter to DEO Male Charsadda on dated 22/04/2024 for further action and process the applications, but despite applications reminders to department, they are not given positive response.
(Copies of applications and SDEO Male letter to DEO attached)
- ix. the service appeal decision in the same nature Issue and matter had come to the knowledge of the appellants in the title case **ABDUL MUBAWIR VS EDUCATION DEPARTMENT** service appeal No- 7597 of 2021, which was decided by the Hon'ble Bench Member of Service Tribunal Peshawar on dated 06-11-2023, whereas the same relief given and granted to one teaching cadre who also appointed with the appellant as PST and later he regularized and also promoted as SPST BPS-14
(Copy of same identical nature case of service Tribunal dated 06-11-2023 attached)
- x. The appellants were also visited to concern quarter of accounts office to allow and include the same increment as well as salaries to appellant, but till date the same is neither included nor been allowed in the appellants salaries slip records.
- xi. feeling aggrieved from the inaction of the DEO Office by not allowing the annual increment for year 2014 as well as the salaries of the month of June July and August 2014, the repeatedly visits applications requests and at last departmental and same identical nature service decided case/appeal, the DEO office on no grounds And without showing any reason were silent on the appellant request applications appeal, and having no other remedy except filing this departmental appeal for speedy remedy and justice.

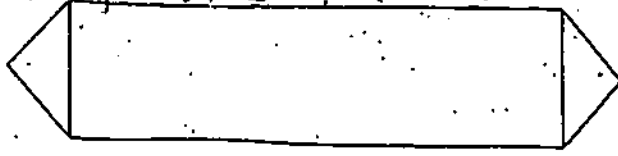
APPELLANT

Shah Muhammad S/O Khair Muhammad
(SPST, BPS-14) Government Primary
School Shahbaz Khan Korona
Shabqadar District
Charsadda

Shah Muhammad



بعدالت صا حیم شی صها لہم ولس لکھنوی



Appellant	2 منجانب	مورد
بنام شی الہیہ ESED ولس	شاہ محمد	مقدمہ
		دعوی
		جرم

باعث تحریر آنکے

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

آن مقام (نہار) کیلئے شخص (الساحل) کے نام سے مقرر کر 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 ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعوی اور بصورت ڈگری کرنے اجراء اور وصولی چیک درود یہ عرضی دعوی اور درخواست ہر قسم کی تصدیق و زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا بیک طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار 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 با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا کالت نامہ لکھد یا کہ سندر ہے۔

محمد (الساحل) صاحب، اصرار

شیہ محمد ولد شیہ محمد

Appellant Accepted

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 [Signatures and stamps]

العبارہ دگ واہ العبارہ
 مقام (نہار)