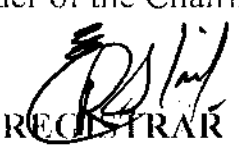


# FORM OF ORDER SHEET

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

Appeal No. 1921 /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,

DL. 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. 1921 / 2024

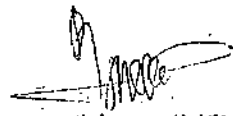
Saeed Khan VERSUS The District Education Officer (Male) District Charsadda.

INDEX SHEET

S.No	Descriptions	Annexure	P.No
1	Memo of Appeal		1-5
2	Affidavit		6
3	Notices to Parties		-
4	Copies of appointments orders of Appellants dated 31-05-2014	A	7-8
5	Copies of appellants Charges Reports dated 31-05-2014	B	9
6	Copies of Schools attendance Register dated 31-05-2014 of appellants	C	10
7	Copies of Regularization Order of appellants	D	11-13
8	Copies of Promotion Order of appellants	E	14-15
9	Copies of applications/request to SDEO/DEO	F	16
10	Copy of SDEO Letter to DEO	G	17-18
11	Copy of same identical nature case service appeal No- 7597/2021 decided on dated 06-11-2023 by Kp Service Tribunal	H	- 19-28
12	Copies of Departmental Appeal	I	29
13	Wakalat Nama		30

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. 1921 /2024

Saeed Khan S/O Mian Gul (SPST, BPS-14) Government Primary School Matta Mughal  
Khel, 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 CHARSADDA, WHEREAS THE DEPARTMENT NOT GIVEN ANY RESPONSE TO APPELLANTS.

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 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.

Respectfully Sheweth.

The Appellant 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.

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 promote 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.

**GROUNDS:**

- 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 la 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.

- 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.

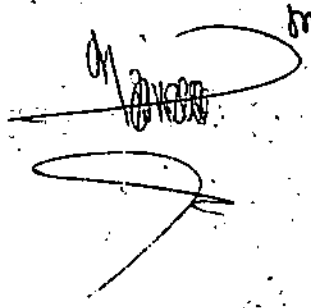
IT IS THEREFORE HUMBL Y PRAYED THAT, ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE INACTION OF THE RESPONDENTS BY NOT ALLOWING THE ANNUAL INCREMENT FOR THE YEAR 2014 AND NOT RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, AND NOT DECIDED THE DEPARTMENTAL APPEAL WITHIN 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

*Saeed*

Saeed Khan

Through Counsel

*M. Iqbal*  


*Muhammad Iqbal*  
*Advocate*

5

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO \_\_\_\_\_/2024

Saeed Khan S/O Mian Gul (SPST, BPS-14) Government Primary School Matta Mughal Khel,  
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.

Appellants

APPELLANT

*Saeed*

Saeed Khan

Through Counsel

*Muhammad Ismail*

*Advocat.*

*[Signature]*



6

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR**

Service Appeal No. \_\_\_\_\_ / 2024

Saeed Khan S/O Mian Gul (SPST, BPS-14) Government Primary School Matta Mughal Khel,  
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, Saeed Khan S/O Mian Gul (SPST, BPS-14) Government Primary School Matta Mughal Khel,  
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.

Deponent Saeed

M. Ismail  
**IDENTIFIED BY**  
Muhammad Ismail  
Advocate High Court



Through counsel

Ismail Khan  
Umar Khan  
Amjid Khan Mohmand  
Advocates High court Peshawar

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHIARSADDA

**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
60/134	SAEED KHAN 17101-7276529-5	GPS Matta Mughal Khel	M.M Khel	114.32

**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

- 13. His appointment is made on School based, He will have to serve at the place of 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: 11807-4958 /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

(9)

چارج رپورٹ

6. کورب آرڈر نمبر 4807-4958 از ڈسٹرکٹ ایجوکیشن آفیسر صاحب،

چارسدہ من مسمیٰ سید (رخوان ولد میراگل) S-5-7276529-17101-Nic#

سے آج مورخہ 31/05/2014 بعد از دوپہر بحیثیت PST

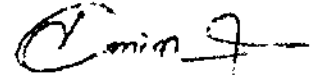
شورمختہ پرائمری سکول میں داخلہ خلیں "سکرل رٹو قدر"

میں اپنی عہدہ سے کما چارج لیا

چارج گریڈ

50000

چارج دہنہ



31/05/2014

Head Master  
Govt. Primary School  
Matta Mochal, Distt. Charsadda

(10) (10)

Note: The entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated

91380  
marks  
letter  
1/4

1. Name: Saeed Khan

2. Race: Afghan

3. Residence: Village and P-o matta mughal khel  
(Rehman bagh) Teh: shabqaddar distte charsadda

m BISE

4. Father's name and residence: Mian Gul

out of  
ied from  
Peshawar

5. Date of birth by Christian era as nearly as can be ascertained: (01/02/1989)  
4st february nineteen eighty nine

Date  
var under






6. Exact height by measurement: 5' - 8"

out of  
ly verified  
-8-2014

7. Personal marks for identification: Nil

shawar  
is 837  
all duly  
2014 7-8-

8. Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger:		Ring Finger:	
Middle Finger:		Fore Finger:	
Thumb:			

ader Roflo  
566-  
y Verified  
009 23  
2014

9. Signature of Government Seryant: Saeed Khan

10. Signature and designation of the Head of the office, or other Attesting Officer. Saeed Khan (M) Charsadda

Saeed Khan (M)  
shabqaddar

(10) (11)

8	9	10	11	12	13	14	15
Signature of government servant	Signature and Designation of the head of the office or other attesting officer. In attestation of columns 1 to 8	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	Leave Nature and duration of leave taken Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government Period Government to which debit to	Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			<p><b>NOTIFICATION</b></p> <p>(Appointment and regularization of the services) Act, 2017 (Khyber Pakhtunkhwa Act no.1 of 2018) and Elementary &amp; Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. SO(S/F) &amp; SED/3-2/2018/SITT/ Contract dated Peshawar the 16/02/2018, services of the following(433) primary School Teachers appointed through NTS on Adhoc basis on contract w.e.f ( 31-05--2014 to 15-07-2017), are hereby regularized in BPS-12 on the same posts in Teaching cadre vide DEO( M) Chd Endst:No 19747-20188 dated 12-03-2018.</p>
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar		TR-23901 20/16/2018 3-15-2018				
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar		26/05/2018 Date of pay order due to regularization from 12/2015 to 31/5/2018				
						<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar	
							<p><b>UNDER TAKING</b></p> <p>I Mr. <i>[Signature]</i> PST / SPST / PSHT / GPS / MNA / D / S hereby under take that in the relaxation of my pay if any over payment made to me. It will be recovered from my Pensional / Gratuity e.t.c</p>
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar	11/2011	MAA	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar	19/5/2020	Promoted to SPST PR14	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			Service continue from 01/3/2018 to 31/11/2019 from the A.C.G
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar	30/11/20		<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			and other records of this office.
	<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar			<i>[Signature]</i> Sub Divisional Education Officer (Male) Shabqadar

See 11

See 11

# OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

## NOTIFICATION

In pursuance of The Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. 1 of 2017) and Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. SO (S/F/E & S/O)/17/2018/S/11 /Contract dated Peshawar the 16/02/2018, services of the following (433) Primary School Teachers appointed through NTS on Adhoc basis on Contract w.e.f (31-05-2014 to 15-07-2017), are hereby regularized in BPS 17, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment as mentioned against each in the interest of public service.

12

Sl	Roll No. NTS	Name and Father Name	CNIC No	Name of School	Total Marks out of 200	W/C	Appointment order No & Date	Date of Taking Over Charge	Interim No. & Date
1	1560019	Muhammad Khalid S/O Yusuf Ali	17101-4517023-5	CPS Sialkot 6/8	137.85	Abaszi	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
2	1560021	Muhammad Ali S/O Saad Gul	17101-9264071-5	CPS Sheikh 5/6	128.21	Agra	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
3	1560024	Muhammad Ali S/O Saad Gul	17101-9264071-5	CPS Sheikh 5/6	128.21	Agra	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
4	1561340	Muhammad Amir S/O Iqbal Muhammad	17101-9181359-3	CPS Agra 8/4	114.58	Agra	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
5	1561613	Yasir Shah S/O Waheed Shah	17101-4011854-5	CPS Mandera 1	132.58	Battagram	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
6	1560943	Muhammad Sheza S/O Fida Muhammad	17101-0311533-7	CPS Aghora	139.54	Battagram	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
7	1560944	Muhammad Arif S/O Rahim Khan	17101-0399595-3	CPS Maricla	134.24	Battagram	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
8	1561115	Muhammad Arif S/O Pervez Khan	17101-1491491-7	CPS Matha New	131.45	Battagram	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
9	1561119	Shah Khalid S/O Saffar Shah	17101-4113180-5	CPS Matha Old	129.3	Battagram	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
10	1560302	Muhammad Ali S/O Raza Khan	17101-4001853-1	CPS Ghore Sher 6/8	133.48	Behala	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
11	1560845	Muhammad Ishaq S/O Muhammad Naji	17101-3785291-7	CPS Mian Shakh No 8	132.34	Behala	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
12	1561037	Farooq Khan S/O Faraz Khan	17101-2716191-9	CPS Shahrestan	132.18	Behala	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
13	1561364	Muhammad Usman S/O Usman Usman	17101-4174081-5	CPS Islam Abad District	135.83	Dargai	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
14	1561254	Muhammad Ali S/O Iqbal Khan	17101-4002789-9	CPS Nihal	128.43	District Para	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
15	1560109	Muhammad Usman S/O Usman Usman	17101-4174081-5	CPS Nihal	128.43	District Para	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
16	1560214	Asif Usman S/O Muhammad Ali Shah	17101-0876381-1	CPS District Para	134.31	District Para	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
17	1560125	Usman Gul S/O Usman Gul	17101-4375784-1	CPS Abu Abad-2	171.64	Cherzard	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
18	1561221	Abdul Rehman S/O Rehman Gul	17101-0347715-1	CPS Jan Abad	134.31	Cherzard	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
19	1560934	Devidad Muhammad S/O Fazal Muhammad	17101-0318797-7	CPS Kalyan	104.56	Cherzard	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
20	1560938	Zafar Ali S/O Muhammad Ali	17101-4740811-7	CPS Daska 3	116.17	Daska	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
21	1560990	Muhammad Qasim S/O Muzaf Khan	17101-2219056-1	CPS Haryana 2	131.32	Daska	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
22	1561448	Farooq Muhammad S/O Usman Usman	17101-4174081-5	CPS Shah Dhand	137.37	Daska	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
23	1561164	Muhammad Usman S/O Usman Usman	17101-4174081-5	CPS Karam Buda	123.06	Cherzard	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
24	1561025	Muhammad Usman S/O Usman Usman	17101-4174081-5	CPS Mulla Chher	118.55	Chandi Karkana	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017
25	1560064	Muhammad Usman S/O Usman Usman	17101-4174081-5	CPS Mulla Chher	115.09	Chandi Karkana	4807-4958 Dated: 11/05/2014	01-09-14	23918-24078 Dated: 28/04/2017

26	1561033	Shamir Ullah S/O Saliq	GPS Buz Khan	105.7	Chunda Karam	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
27	1560135	Rehmanullah S/O	GPS Chah Wazir	122.25	Wazir	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
28	1561823	Mi Gaur S/O Zamir	GPS Maimunah	117.8	Wazir	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
29	2391757	Anwar Zeb S/O Umar	GPS Inzar Gul Khan	124.53	Wazir	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
30	1560984	Imad Ali S/O Khan Sher	GPS Khubai	128.94	Hassan Zai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
31	1560844	Muhammad Inzar S/O Ali	GPS Hassan Zai	128.63	Hassan Zai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
32	1560864	Masoom Khan S/O Farid	GPS Sahib	121.13	Hassan Zai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
33	1561581	Ashraf Khan S/O Gulzar	GPS Kofit	115.33	Hassan Zai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
34	1560056	Shahid Khan S/O Gul Roz	GPS MS Gul Chah	129.44	Hassan Zai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
35	1561043	Sher Ali S/O Hafe Ullah	GPS Kangra	131.62	Kangra	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
36	1560959	Noor Ullah Jan S/O	GPS Churambai	124.02	Kangra	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
37	1560097	Prithvi Ansh S/O Rooh U	GPS D. Shambard	118.54	Kangra	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
38	1561449	Shah Muhammad S/O Jan	GPS Harvana	118.98	Kangra	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
39	1560052	Noor Jan S/O Ghani	GPS Harvana	115.19	Kangra	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
40	1560105	Abdur Rafi Jan S/O Momi	GPS Sander Gathi	99.35	Katolai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
41	1561213	Syed Zahoor Abbas S/O	GPS Sander Gathi	96.43	Katolai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
42	1561777	Imam Taj Gul S/O Surtaj	GPS Dheran Kor	127.51	Katolai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
43	1560728	Zia Raig S/O	GPS Katolai	120.86	Katolai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
44	1561165	Sher Bat Khan S/O	GPS Sombai	105.58	Katolai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
45	1560131	Zulqar Ali S/O Haseer	GPS Chawara	128.51	Khan Mahi	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
46	1560150	Anwar Khan S/O Sali	GPS Land Road	122.07	Kot Behram	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
47	1560715	Majeed Khan S/O Dost	GPS Ahar Khig	119.64	Kot Behram	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
48	1561513	Muhter Ullah S/O Shah	GPS Maimunah	119.27	Kot Behram	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
49	1561941	Nazir Ahmad S/O Habib	GPS Maimunah	112.46	Kot Behram	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
50	1560986	Wajid Ahmad S/O Wajid	GPS M. Karam	131.51	M.M.Khai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
51	1561038	Abdus Salam S/O Abid	GPS Maita	124.18	M.M.Khai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
52	1561357	Sayed Khan S/O Mian Gul	GPS Maita	114.32	M.M.Khai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
53	1560748	Wajid Ahmad S/O Umar	GPS Hassan Gul	106.07	M.M.Khai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
54	1561192	Rahim Shah Khan S/O	GPS Kappa	105.66	M.M.Khai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
55	2396055	Syed Zaidun Badhan S/O	GPS Qaryab Kor	104.98	M.M.Khai	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
56	1560743	Razi Khan S/O Nasir	GPS Maimunah	112.51	Maimunah	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
57	1560866	Muhammad Imad S/O	GPS Farid No.3	123.96	M.C.Tangi	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078
58	1561250	Muhammad Dawood Khan S/O	GPS Farid No.1	118.34	M.C.Tangi	4807-4958	Dated: 31/05/2014	01-09-14	2398-24078

*Handwritten signature*





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

DISTRICT EDUCATION OFFICER

*Muhammad*  
12/03/18

Serial No. 19747-2018 F.NO. (Regularization PST 2018) Dated. 12.03.2018

(SIRAJ MUHAMMAD)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARASADA

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, 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 & deduction of GPF fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2011.

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 probationary services shall be forfeited in the case.

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 unless they have not taken over charge or has remained absent from duty or resigned.

6. The regularization will not be in favour of those who have not taken over charge or has remained absent from duty or resigned from service and also not for those who are under disciplinary proceedings.

7. Their pay shall be retained subject to verification of academic documents/ testimonials from the concerned Board/ University by the SDEO concerned.

8. The employees who are regularized under the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regulation of Services) Act, 2017 (Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education) Act, 2017 shall rank junior to all civil servants (Appointment and Regulation of Services) Act, 2017 (Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education) Act, 2017 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 commencement of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regulation of Services) Act, 2017. Their rank 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 employee who is older shall rank senior to the younger one.

9. The seniority list 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 service 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 employee who is older shall rank senior to the younger one.

**TERMS & CONDITIONS**

Sl. No.	Name	Grade	Qualification	Experience	Date of Birth	Date of Joining
422	Syed Zahid S/O Ali Akbar	201	GPF Special Tangi	118.54	2072.84	08-04-17
423	Nadeem Jinn S/O Akbar	196	GPF Trainee No 2	112.6	2072.85	08-04-17
424	Muhammad Ali S/O Sadiq	197	GPF Trainee No 1	118.76	2072.86	08-04-17
425	Muhammad Ali S/O Muhammad	199	GPF Trainee	124.95	2072.85	08-04-17
426	Muhammad Zahid S/O Akbar	199	GPF Trainee	122.95	2072.85	08-04-17
427	Abdul Mujid S/O Akbar	200	GPF Trainee	126	2072.71	22-05-17
428	Muhammad S/O Touqeer	201	GPF No 1 Tangi	120.14	2072.71	22-05-17
429	Muhammad S/O Zameer	202	GPF No 1	121.82	2072.71	22-05-17
430	Muhammad S/O Akbar	203	GPF No 1 Tangi	108.24	2072.71	01-09-17
431	Abdul Mujid S/O Akbar	204	GPF Special	111.59	2072.71	01-09-17
432	Muhammad S/O Sadiq	205	GPF Special	109.24	2072.71	01-09-17
433	Muhammad S/O Akbar	206	GPF Special	122.95	2072.71	01-09-17

(14)

Dist. Education Officer, Charsadda



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

091-9220481 #mixchursadda@yahoo.com

15

SKE

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 2472-2542 / Promotion / Estab Dated Peshawar the 21/01/2013, the following Primary School Teachers (BPS-12) are hereby promoted to the post of ST-ST (BPS-14) (Rs.15180-1170-50280) 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.

S#	NAME	PRESENT SCHOOL	POSTED AT	REMARKS
1	SHEFI MUHAMMAD KHAN	GPS GANDERI BALA	GPS PALAY DOBANDI	AVP
2	MIRHAJ ULLAH	GPS AMBA DHERI- NO.2	GPS AMBA DHERI - NO.2	AVP
3	ABDUL ALI KHAN	GPS CHEENA	GPS CHEENA	AVP
4	ZUBAIR	GPS PLA DHERAI	GPS PLA DHERAI	AVP
5	ADNAN	GPS KHULY	GPS KHULY	AVP
6	FAZAL MAHAN	GPS KHAT KILLI SHOLGARA	GPS KHAT KILLI SHOLGARA	AVP
7	ABID QAYUM	GPS MALIK ABAD	GPS MALIK ABAD	AVP
8	ISTIKHAR ULLAH	GPS MARCHAKI	GPS MARCHAKI	AVP
9	MUSLIM SHAH	GPS IHAM KILLI	GPS LANDAI SHAH	AVP
10	MUHAMMAD YOUSAF	GPS KULA DHER NO.1	GPS KULA DHER NO 1	AVP
11	ASLAM KHAN	GPS KHORA ABAD	GPS KHORA ABAD	AVP
12	MUJIB ALI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	AVP
13	MUSA ULLAH	GPS ISLAM ABAD DARGAI	GPS ISLAM ABAD DARGAI	AVP
14	NAFIS JAN	GPS KASS KOROONA	GPS KASS KOROONA	AVP
15	NASIK KHAN	GPS KHISRO KHAN KILLI	GPS SHAHNAWAZ KILLI	AVP
16	TIJAWAT SHAH	GPS MANDEZAI	GPS MANDEZAI	AVP
17	MUHAMMAD KHALID	GPS STATION KOROONA	GPS GHULAM FARID KILLI	AVP
18	WAJID ULLAH	GPS PALOSA JADEED	GPS PALOSA JADEED	AVP
19	MUHAMMAD ISHTIAQ	GPS MERA SHAKH- NO.6	GPS BEHLOLA	AVP
20	ABDUL MUSAWIR	GPS ANGAR KOROONA	GPS ANGAR KOROONA	AVP
21	SHER ALI	GPS KANGRA	GPS KANGRA	AVP
22	SABIR SHAH	GPS ZUHRAB GUL KILLI NO 1	GPS ZUHRAB GUL KILLI NO 1	AVP
23	SHEHER GHAYAS KHAN	GPS PARAO NISATTA	GPS PARAO NISATTA	AVP
24	MUHAMMAD SHOAB	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	AVP
25	QAMRU KHAN	GPS MIAN SANIB GUL KILLI	GPS MIAN SANIB GUL KILLI	AVP
26	JAWAD ALI	GPS KHUBAI	GPS KHUBAI	AVP
27	SULEMAN ALI	GPS CHAMYARAN	GPS CHAMYARAN	AVP
28	KAYAM ULLAH	GPS AJODH KILLI	GPS AJODH KILLI	AVP
29	MUJASIR SHAH	GPS RIZWAN ABAD	GPS RIZWAN ABAD	AVP
30	YASIR KHAN	GPS IHAM KILLI	GPS IHAM KILLI	AVP
31	ZUBAIR KHAN	GPS SHAHBAZ KHAN	GPS SHAHBAZ KHAN	AVP

Send

77	JAWAD MUHAMMAD	GPS SHAH DHAND	GPS SHAH DHAND	AVP
78	USMAN ALI	GPS SHEIKH ABAD RAJJAR	GPS SHEIKH ABAD RAJJAR	AVP
79	MADAR KHAN	GPS MALKA DHER	GPS MALKA DHER	AVP
80	FATHUL AMIN	GPS DHERI SIKANDER KHAN	GPS DHERI SIKANDER KHAN	AVP
81	MIAN ADIL SHAH	GPS AGRA BALA	GPS AGRA BALA	AVP
82	IRFAN ULLAH	GPS AMBA DHER NO 1	GPS AMBA DHER NO 1	AVP
83	ASIF SHAH	GPS SHALMANO KILLI	GPS SHALMANO KILLI	AVP
84	SHAD MUHAMMAD	GPS HARYANA	GPS HARYANA	AVP
85	TAEEM JAH	GPS YAKH KOHI	GPS YAKH KOHI	AVP
86	MUHAMMAD SHAHJAD KHAN	GPS KASS KORROONA	GPS KASS KORROONA	AVP
88	AZMAT HUSSAIN	GPS MARCHAKI-2	GPS MARCHAKI-2	AVP
89	HISSAN 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 KHILLI PRANG	GPS KHAT KHILLI PRANG	AVP
92	KAMRAN ULLAH	GPS MALKA DHER	GPS MALKA DHER	AVP
93	RASOOL SHAH	GPS PRANG- NO.3	GPS PRANG- NO.3	AVP
94	MUHAMMAD AMIN	GPS AGRA BALA	GPS AGRA BALA	AVP
95	SHAH MUHAMMAD	GPS YAR JAN KORROONA	GPS YAR JAN KORROONA	AVP
96	ABDUR RAHMAN	GPS JAN ABAD	GPS JAN ABAD	AVP
97	SAEED KHAN	GPS MTTA MUGHAL KHEL	GPS MTTA MUGHAL KHEL	AVP
98	ASIF ULLAH	GPS DAULAT PURA	GPS GAGER	AVP
99	MUHAMMAD SAJJAD	GPS GHURAI KORROONA	GPS GHURAI KORROONA	AVP
100	SHAHJAHAN SHAH	GPS BOSA KHEL PRANG	GPS BOSA KHEL PRANG	AVP
101	MUHAMMAD RIZWAN	GPS MIAN SAHIB GILLI	GPS MIAN SAHIB GILLI	AVP
102	SAJIDUL AMIN	GPS DAGSHAMOZA	GPS DAGSHAMOZA	AVP
103	MUHAMMAD SAJJAD	GPS NISHAT ABAD	GPS NISHAT ABAD	AVP
104	ZAFER ALI	GPS INZER QALA	GPS INZER QALA	AVP
105	YASIR KHAN	GPS MANDANI	GPS MANDAN	AVP
106	NAZIR AHMAD	GPS MARDHAN NO.1	GPS MARDHAN NO.1	AVP
107	MUHAMMAD SAJJAD	GPS SULA KAMAN	GPS SULA KAMAN	AVP
108	ZAINUL ABIDIN	GPS SARKI TITARA-NO.1	GPS SARKI TITARA-NO.1	AVP
109	JAMIL MUHAMMAD KHAN	GPS TARIQ ABAD	GPS TARIQ ABAD	AVP
110	MUHAMMAD GULZAR	GPS SHAH DHAND	GPS SHAH DHAND	AVP
111	SHAHAR ALI	GPS GANGOO	GPS GANGOO	AVP
112	MANZOOR ALI	GPS GUJRANO KILLI	GPS GUJRANO KILLI	AVP
113	MAJID SHAH	GPS RHMAT ULLAH KORROONA	GPS RHMAT ULLAH KORROONA	AVP
114	AFZAL AHMAD	GPS CHITLA DHERI	GPS HAJI ABAD UHARZAI	AVP
115	ASFANDIYAR	GPS PRANG- NO.3	GPS PRANG NO.3	AVP
116	ZAHOOR AHMAD	GPS SHERPAO NO.1	GPS SHERPAO NO.1	AVP
117	TARIQ ALI	GPS KATIGAN	GPS KATIGAN	AVP
118	MUHAMMAD HANIF	GPS WARDAGA- NO.1	GPS WARDAGA- NO.1	AVP
119	ADYAN KHAN	GPS CHILOR HANNO	GPS CHILOR HANNO	AVP
120	KHAN MUHAMMAD	GPS RASHAKAI	GPS RASHAKAI	AVP
121	NAJIB ALI	GPS DANGAI	GPS DANGAI	AVP

- 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	POST/DAT	REMARKS
1	Riaz Ali SPST	GPS Katz Korona	GPS Tale Shah	Single teacher school
2	Khurshid Alam SPST	GPS Gul Shah Killi	GPS Bari Bari	Adjusted being s/plus
3	Jawad Khan SPST	GPS Kagan	GPS Safa Bari Band	Adjusted being s/plus
4	Abdul Bari Jan SPST	GPS Chulam Farid Killi	GPS No.1 Seder Gurdial	N.Basis
5	Muhammad Sajjad SPST	GPS Chundri Korona	GPS Banda Rashahel	Adjusted being s/plus
6	Muslim Khan SPST	GPS Mirza Dher No.1	GPS Hassanzi	N.Basis
7	Behar Rahman SPST	GPS Rafi Ullah Korona	GPS Bichyano Killi	N.Basis
8	Nisar Ali PST	GPS Landi Shah	GPS Arat Korona	Being disable
9	Zahir Ullah SPST	GPS Shabara No.1	GPS Sukkar	N.Basis
10	Muhammad Zahoor PST	GPS Shah Nawaz Killi	GPS Behola Bah	N.Basis
11	Aziz ur Rahman SPST	GPS Azim Gul Milan Killi	GPS Satt Ahad	N.Basis
12	Hubab Akhtar SPST	GPS Khan Khel	GPS Gonda	N.Basis
13	Shah Jehan PST	GPS Nimoral Baba	GPS Serekh Killi	N.Basis
14	Abdur Rehman SPST	GPS Risaldar Killi No.2	GPS Garu Hameed Gul	N.Basis

**NOTE:-**

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

(JSHANGIR KHAN)  
DISTRICT EDUCATION OFFICER  
(MALE, CHARSADDA)

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

- Copy for information to the:
1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
  2. Deputy Commissioner Charsadda.
  3. District Accounts Officer Charsadda.
  4. District Monitoring Officer (IMJ) Charsadda.
  5. Sub-Divisional Education Officer (Male) Charsadda.
  6. Sub-Divisional Education Officer (Male) Tangi.
  7. Sub-Divisional Education Officer (Male) Shabqadar.
  8. Official concerned.
  9. Office file.

*(Signature)*  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

18

18

To

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: Saeed Khoren

Designation: SPST

School: GPS M.M. Khel

Contact No 0307 8212782

Signature: Saeed

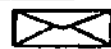
Date: 20/04/2024

20/04/24

19

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

No. 10021,



sdeopri@gmail.com

Dated 22/14/2024

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 & AUGUST  
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 Spinkal No,1 Shabqadar
4	Abdur Rafi Jan	SPST	GPS Katozal No.2.
5	Rahm Shid Khan	SPST	GPS Krapa Muhmmad Khan
6	Zia Rafiq	SPST	GPS, Katozal No.3.
7	Naseem Khan	SPST	GPS Mir Zai
8	Zubair Khan	SPST	GPS Shahbaz Khan Kor
9	Mustafa Zeb	SPST	GPS, Mian 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 Rashakal
13	Khan Muhammad.	SPST	GPS, Rashaki
14	Zakir Ullah	SPST	GPS, No1.Kodal
15	Shah Muhammad	SPST	GPS Shahbaz Khan Killi

20


2030



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

16	Ihsan Ali	SPST	GPS,
17	Muhammad Izhar	SPST	GPS, Hassanzal
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 Shoalb	SPST	GPS Ashara Battagram
31	Arshad Khan	SPST	GPS, Kotak
32	Adnan Hussain	SPST	GPS, Gonda

Encl. As Above

  
Sub Divisional Education Officer  
(Male) Shabqadar



21

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

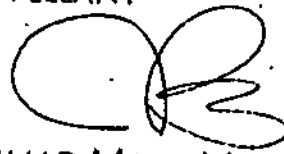
ABDUL MUSAWIR V/S EDUCATION DEPTT:

INDEX

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

22

~~22~~

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 REGRETTEED 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 Sheweth,

FACTS:

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

ATTESTED  
[Signature]

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 ..... A.

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 ..... B & C.

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..... D.

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

ATTACHED

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 & G.

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 01<sup>st</sup> 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

 REGISTERED

25

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 mala fide 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

EXAMINER  
High Court, Peshawar  
District Court, Peshawar

28


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



ATTESTED  
BY  
MUNICIPAL  
OFFICE  
GADAP  
2017

27

20

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 7597/2021

BEFORE: MRS. RASHIDA BANO ... MEMBER(J)  
MR. MUHAMMAD AKBAR KHAN ... 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

R

ATTESTED  
EXAMINED  
BY THE MEMBER (J)  
MRS. RASHIDA BANO







29

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.

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 6<sup>th</sup> day of November, 2023.*

(MUHAMMAD AKBAR KHAN)  
Member (E)

(RASHIDA BANO)  
Member (J)

30/7/24  
30/7/24  
30/7/24

Date of Presentation of Application 30/7/24  
Number of Words 7 P  
Copying Fee 25/-  
Urgent 9/-  
Total 100/-  
Name of Copyist  
Date of Completion of Copy 30/7/24  
Date of Delivery of Copy 30/7/24

**ORDER**  
06.11.2023




30

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. Consign.

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

  
(Muhammad Akbar Khan)  
Member (E)

  
(Rashida Bano)  
Member (J)

To

The Director Education

Elementary and Secondary Education KP Peshawar.

31

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-52. (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 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 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

Saeed Khan S/O Mian Gul  
(SPST, BPS-14) Government Primary  
School Matra Mughal Khel, Shabqadar District  
Charsadda

