


# FORM OF ORDER SHEET

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

Appeal No. 1933 /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. 1933 / 2024

Syed Zaheer Abbas VERSUS The District Education Officer (Male) District Charsadda.

INDEX SHEET

S.No	Descriptions	Annexure	P.No
1	Memo of Appeal		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 Service Books of appellants	D	11-12
8	Copies of Regularization Order of appellants	E	13-15
9	Copies of Promotion Order of appellants	F	16-18
10	Copies of applications/request to SDEO/DEO	G	19
11	Copy of SDEO Letter to DEO	H	20-21
12	Copy of same identical nature case service appeal No- 7597/2021 decided on dated 06-11-2023 by Kp Service Tribunal	I	22-31
13	Copies of Departmental Appeal	J	32
14	Wakalat Nama		33

Appellants

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

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1933 /2024

Syed Zaheer Abbas S/O Syed Sikandar Shah (SPST, BPS-14) Government Primary School Saddar Ghari No-3, 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 CHARSADEA, 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 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.

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.

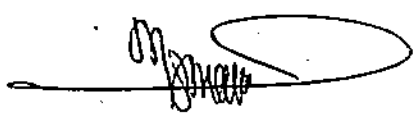
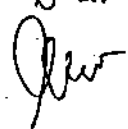
#### GROUND:

- 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.

- 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   
 Syed Zaheer Abbas

Through Counsel *Muhammad - Ismail*  
 Advocate  


**BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR**

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

Syed Zaheer Abbas S/O Syed Sikandar Shah (SPST, BPS-14) Government Primary School Saddar Ghari No-3, 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

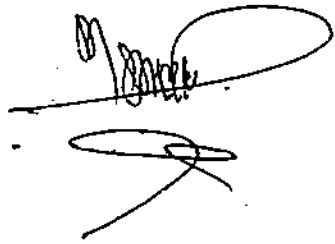


Syed Zaheer Abbas

Through Counsel

Muhammad - (Email

Advocate





BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

(8)

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

Syed Zaheer Abbas S/O Syed Sikandar Shah (SPST, BPS-14) Government Primary School  
Saddar Ghari No-3 , 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


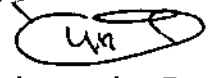
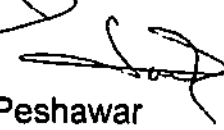
I, Syed Zaheer Abbas S/O Syed Sikandar Shah (SPST, BPS-14) Government Primary School Saddar Ghari No-3 , Shabqadar District Charsadda, do hereby solemnly affirm and states on oath that the contents of accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Deponent 

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) CHARSAJDA**

**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.No	Name	School Name	U/C	Score
07/11/23	SYED ZAFER ABBAS 17101-0960254-5	GPS Spinkal-1	Katozai	96.28

**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 DDO(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 DDO(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.



8

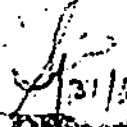
**Appointment Order PST (M) Ad hoc -Based**

- 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: 41807-4958 /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

  
31/5/14  
District Education Officer  
(Male) Charsadda

# CHARGE REPORT

(9)

(29)  
(10)

Certified that Mr. Syed Zahcer Abbas S/O. Syed Sikandar Shah has this day in the forenoon taken over the charge of *Primary School Teacher* at G.P.S Spinkai -I SKF. Vide Endst. No: 4807-4958/Dated: Charsadda the.31/5/2014 Government of Khyber Pakhtunkhwa office of the district education officer(M) Charsadda.

Charge report is submitted to the District Education Office (Male) Charsadda for record.

## Handed Over Charge

Head Master

GPS Spinkai -I

Dated: 31/05/2014

Sign: 

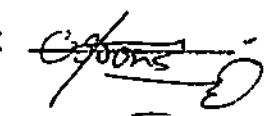
31/5/2014

## Taken Over Charge

Syed Zahcer Abbas



Primary School Teacher

Serial No: 47/144

Sign: 



Note:- The 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.

1. Name: SYED ZAHEER ABBAS  

2. Race: \_\_\_\_\_

3. Residence: SADDAR GARHI "CHEAK POST" SHARQADAR  
CHARSADDA






4. Father's name and residence: SYED SIKANDAR SHAH

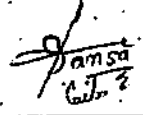
5. Date of birth by Christian era as nearly as can be ascertained: (15/06/1987) (15 JUN NINETEEN EIGHTY SEVEN)

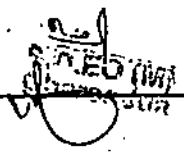
6. Exact height by measurement: 5-9

7. Personal marks for identification: MARK IN EYE "RIGHT"

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

Little Finger		Ring Finger	
Middle Finger		Fore Finger	
Thumb			

9. Signature of Government Servant: 

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

12

160

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature 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.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				<p>S.D.E.O (M) Charsadda</p>			
		<p>TR N-531/2014/12 b-20-52-997-727</p>		<p>ENCLST NO: 4807-4950 dated: 31<sup>st</sup> 2014 M.A. from 01-09-2014.</p>			
		<p>Pgt- 1/2/2014 244</p>				<p>S.D.E.O (M) Chd</p>	
						<p>Service verified w.e.f. 01/09/14 in 30-6-17 From the A.c.g.</p>	
						<p>ref and other record of this office</p>	
<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p>Sub Divisional Education Officer (Male) Shabqadar</p>	
						<p>Service verified w.e.f. 1-2-2017 in 30-11-17 From the A.c.g.</p>	
						<p>ref and other record of this office</p>	
<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p>Sub Divisional Education Officer (Male) Shabqadar</p>	
<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p>Sub Divisional Education Officer (Male) Shabqadar</p>	

GIRNU

# OFFICE OF THE DISTRICT EDUCATION OFFICER (DIALE) CHITRAWALI

13

## 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 2018) and Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. SO (S/F/E & 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 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:

S#	Roll No. NTS	Name and Father Name	CNIC No	Name of School	Total Marks per of 200	U/C	Appointment order No. & Date	Date of Taking Over Charge	Extension No. & Date
1	1560039	Muhammad Khalid S/O Yousaf Ali	17102-6537002-5	GPS Station KMI	132.89	Abatal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
2	1560071	Marjan Ali S/O Saad Gul	17101-9766071-5	GPS Sheikhi KMI	121.21	Agri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
3	1560014	Milan Adil Shah S/O Milan Kifayat Ullah	17101-6844013-5	GPS Agri Bala	118.33	Agri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
4	1561340	Muhammad Amin S/O Israr Muhammad	17101-9189159-3	GPS Agri Bala	114.58	Agri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
5	1560163	Tasawt Shah S/O S.Willayat Shah	17101-0113694-5	GPS Mandtal	133.59	Battagram	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
6	1560941	Muhammad Shoaib S/O Fida Muhammad	17101-0315588-7	GPS Athara	129.66	Battagram	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
7	1560994	Shah Anwar S/O Rahim Khan	17101-0399895-3	GPS Marozai	124.24	Battagram	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
8	1560125	Muhammad Asim S/O Pervez Khan	17101-7492493-7	GPS Mathra New	133.45	Battagram	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
9	1561110	Shah Khalid S/O Sajjad Shan	17301-4432160-5	GPS Mathra Chaudhri	115.3	Battagram	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
10	1560007	Nadir Khan S/O Nadir Khan	17101-0307893-1	GPS Khatra Khan KMI	115.48	Bachlo	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
11	1560843	Muhammad Ishaq S/O Muhammad Nabil	17101-3765851-7	GPS Minar Shaikh No.6	132.34	Bachlo	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
12	1561037	Yaseen Khan S/O Fawad Khan	17101-3716295-9	GPS Shaheedia	132.18	Bachlo	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
13	2761564	Mstem Ullah S/O Ubaid Ullah	17101-8378629-9	GPS Islam Abad Dargal	125.83	Dargal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
14	1561254	Muhammad Ali S/O Faqir Jan	17101-0300786-9	GPS Hattal	118.45	Duzai Para	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
15	1560109	Norm Ull Haq S/O Abdul Dayan	17101-6170115-7	GPS Ambarher-1	116.29	Duzai Para	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
16	1560214	Asif Ullah S/O Moorqat Ali Shah	17101-0826588-1	GPS Duzai Para	114.31	Duzai Para	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
17	1560175	Umar Gul S/O Zehra Gul	17101-6375764-1	GPS Adil Abad-2	121.64	Dheri Zardad	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
18	1561821	Abdullah S/O Rehman Gul	17101-0342715-3	GPS Inq Abad	114.37	Dheri Zardad	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
19	1560954	Dawood Masood S/O Fazal Masood	17101-0328797-7	GPS Kalyas	104.56	Dheri Zardad	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
20	1560938	Zahir Ali S/O Muhammad Ali	17101-0260821-7	GPS Duzai Para	118.27	Duzai Para	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
21	1560990	Muhammad Gulzar S/O Mera Khan	17101-2339058-1	GPS Kalyas-2	111.12	Duzai Para	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
22	1561448	Fawad Muhammad S/O - Abid Muhammad	17101-1671224-5	GPS Shah Dhand	117.17	Duzai Para	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
23	1561168	Shakeel Ahmad S/O Farooq Shah	17101-7470451-9	GPS Karim Banda	123.06	Gandheri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
24	1561005	Waqar Khan S/O Mustafa Khan	17101-5163178-3	GPS Mafza Dher	116.58	Chandk Kartana	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
25	1560084	Karwan Ullah S/O Adnan Rehman	17101-0518190-9	GPS Mafza Dher	115.09	Chandk Kartana	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017



114

27	1560135	Rehmanullah S/O Hameed Khan	17103-0354096-1	GPS Ocha Wala-1	122.23	Haji Zai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
28	1561821	Ali Gauhar S/O Zameer Gul	17103-0371185-7	GPS Mahmood-Abad	117.8	Haji Gul	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
29	2961757	Anwar Zeb S/O Umar Khan	17102-3704269-7	GPS Inzar Gul KM	124.33	Harchand	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
30	1560094	Jawad Ali S/O Khan Sher	17101-1922862-5	GPS Khatol	128.94	Hassan Zai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
31	1560844	Mubammad Ishaq S/O Ali Rahman	17103-3845983-7	GPS Hassan Zai	123.53	Hassan Zai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
32	1560854	Naseem Khan S/O Farid Malla	17101-0395647-3	GPS Sohno-1	122.11	Hassan Zai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
33	1561581	Arshad Khan S/O Gular Khan	17101-8362752-7	GPS Kotak	115.33	Hassan Zai	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
34	1560036	Shahid Khan S/O Gul Rai	17102-2870858-1	GPS MS Gul Omba	129.44	Hisara Nehri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
35	1561043	Sher Ali S/O Hafiz Ullah	17101-8818440-3	GPS Kangra	131.62	Kangra	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
36	1560958	Noor Ullah Jan S/O Roohullah Jan	17101-0167274-9	GPS Ghwarobah-1	124.02	Kangra	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
37	1560097	Faizul Amin S/O Roohul Amin	17101-8141851-5	GPS Q. Sander Khan	116.54	Kangra	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
38	1561449	Shah Muhammad S/O Jan Muhammad	17101-7583487-3	GPS Haryana	115.98	Kangra	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
39	1560057	Naseem Jan S/O Ghani Khan	17101-9764384-5	GPS Haryana	115.19	Kangra	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
40	1560105	Abdur Rafiq Jan S/O Mohd Abdul Sami	17101-6321182-5	GPS Sedar Garhi-3	99.35	Katozal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
41	1561211	Syed Zafar Abbas S/O Syed Shandar Shah	17101-0260254-5	GPS Sarder Garhi	96.43	Katozal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
42	1561772	Bakht Taj Gul S/O Sarraj	17101-2528410-5	GPS Dherai Kor	122.51	Katozal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
43	1560178	Zia Rafiq S/O Muhammad Rafiq	17101-0377826-3	GPS Katozal-1	120.86	Katozal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
44	1561165	Sher Bai Khan S/O Abdullah Khan	17101-9168708-7	GPS Splah-2	105.38	Katozal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
45	1560131	Zulqar Ali S/O Harat Umar	17101-0310390-9	GPS Chanayran	128.51	Khan Mahl	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
46	1560150	Amrooz Khan S/O Sajj Ullah Khan	17102-1651249-1	GPS Land Road	122.07	Koz Behram Dheri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
47	1560715	Majid Khan S/O Dost Muhammad	17102-7714899-5	GPS Arat KM	119.64	Koz Behram Dheri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
48	1561513	Mukhtar Ullah S/O Shah Zarin	17102-1163877-1	GPS Islamabad Deoband	119.22	Koz Behram Dheri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
49	1561341	Nazir Ahmad S/O Habib Ullah	17102-6036816-7	GPS Marhand No.1	112.46	Koz Behram Dheri	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
50	1560796	Wahid Ahmad S/O Waiz Zada	17103-0348097-5	GPS M. Rustam Khel	131.51	M.M Khel	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
51	1561038	Abdus Salam S/O Abd Ullah	17301-3407033-1	GPS Matto Mughal Khel	124.18	M.M Khel	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
52	1561357	Saeed Khan S/O Aman Gul	17101-7276529-5	GPS M.M. Mughal Khel	114.32	M.M Khel	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
53	1560748	Wahid Ahmad S/O Ullah Gul	17101-4418397-3	GPS Hassan Gul Kor	106.07	M.M Khel	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
54	1561192	Raham Shad Khan S/O Sher Bai Khan	17101-9461238-9	GPS Kappa Muhammad Khan	105.88	M.M Khel	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
55	2960035	Syed Ziauddin Badshah S/O Mohd S. Badshah	17101-0275214-9	GPS Daryab Kor	104.98	M.M Khel	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
56	1560713	Yasir Khan S/O Nazir Khan	17102-2872837-3	GPS Mandari	112.51	Mandari	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
57	1560888	Muhammed Ismail Shahid S/O Hira Ud Din	17102-0407189-7	GPS Tangi No.3	123.86	MC Tangi	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
58	1561250	Muhammed Dawood	17102-7433487-				4807-4958		23938-24078

*[Handwritten signature]*

123

423	2031001233	Sayed Khan S/O AB Albar	17102-9394848-195	GPS Spinnal Teraj	118.84	Shodag	20762-858 Dated:28/03/2017	08-04-17
423	2031001449	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	2031001023	Muhammad Ali S/O Zaili Ullah Khan	17102-9394848-197	GPS Tarnab No.1	111.76	Tarnab	20762-856 Dated:28/03/2017	08-04-17
425	2031001107	Mazhar Ali S/O Inshar Ali	17102-9394848-198	GPS Umarjal No.1	134.95	Umarjal	20762-858 Dated:28/03/2017	08-04-17
426	201701971	Muhammad Zohab S/O Muhammad Yousof	17102-9394848-199	GPS Oheri Zarded No.1	112.95	Oheri Zarded	20762-856 Dated:28/03/2017	08-04-17
427	2031001161	Abdul Majid S/O Abdul Bari	17102-9394848-200	GPS Mubtbin Kharooni SIB	128	Messurazi	27462-71 Dated:20/05/2017	22-05-17
428	2017000247	Arif Ullah S/O Yousof Gul Majeed Ur Rehman (Disable Quota) S/O Zaheer Ullah	17102-9394848-201	GPS No.1 Tendi	120.14	MC-Tandi	27462-71 Dated:20/05/2017	22-05-17
429	2017000286	Majeed Ur Rehman (Disable Quota) S/O Zaheer Ullah	17102-9394848-202	GPS No.1 Charsadda	121.32	MC-80 Charsadda	27462-71 Dated:20/05/2017	22-05-17
430	203100325	Hazrat Ullah S/O Alamzaid	17102-9394848-203	GPS Arat KIB	106.74	KotSohranOheri	27530-34 Dated:21/05/2017	03-09-17
431	2031001329	Aali Ur Rehman(Disable Quota) S/O Gul Rehman	17102-9394848-204	GPS Dhakki	111.59	Dhakki	27547-53 Dated:21/05/2017	01-09-17
432	201700483	Syed Wajayt Shah S/O Syed Farah Slat Shah	17102-9394848-205	GPS Haldar KIB	109.59	Shodag	28873-76 Dated:15/07/2017	01-09-17
433	2031000963	Yahya Jan S/O IRBai Khan	17102-9394848-206	GPS Mahmood Abad	121.61	Chandrodag	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 / deduction 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 resign / 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 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), 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) CHARSADDA

Letter No. 19747-20188 F.NO. (Regularization PST 2018) Dated: 12/03/2018

- 1. Copy forwarded for information to the:-
- 1. Director E&S Deptt. Khyber Pakhtunkhwa Peshawar.
- 2. District S.O. Charsadda
- 3. Deputy Commissioner Charsadda
- 4. District Monitoring Officer E&S Charsadda
- 5. S.D.O. Charsadda
- 6. S.D.O. Tandi
- 7. S.D.O. Sharsada
- 8. District Accounts Officer Charsadda
- 9. Official concerned
- 10. File

Muhammad Siraj  
12/03/18

Dy: DISTRICT EDUCATION OFFICER



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

001-0220451 amischarsadda@yahoo.com

16

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.2412-2542 / Promotion - Estab Dated Peshawar the 21-01-2013, the following Primary School Teachers (BPS-12) are hereby promoted to the post of SNT (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.

Sr	NAME	PRESENT SCHOOL	POSTED AT	REMARKS
1	SHER MUHAMMAD KHAN	GPS GANDERI BALA	GPS PALAY DOBANDI	A.V.P
2	MUNHAJ 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	ADNAN	GPS KHULY	GPS KHULY	A.V.P
6	FAZAL MANAN	GPS KHAT KILLI SHOLGARA	GPS KHAT KILLI SHOLGARA	A.V.P
7	ASID O-SYUM	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	AKHTAR ALI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	A.V.P
13	NIZAM ULLAH	GPS ISLAM ABAD DARGAI	GPS ISLAM ABAD DARGAI	A.V.P
14	NAEEM JAN	GPS KASS KOROONA	GPS KASS KOROONA	A.V.P
15	NASIR 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 BEHLOLA	A.V.P
20	ABDUL MUSAWIR	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	SHEHER GHAYAS KHAN	GPS PARAO NISATTA	GPS PARAO NISATTA	A.V.P
24	MUHAMMAD SHOAB	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	A.V.P
25	SHAHID KHAN	GPS MIAN SAHIB GUL KILLI	GPS MIAN SAHIB GUL KILLI	A.V.P
26	JAWAD ALI	GPS KHUBAI	GPS KHUBAI	A.V.P
27	ZULFIQAR ALI	GPS CHAMYARAN	GPS CHAMYARAN	A.V.P
28	KARIM ELAHI	GPS AJOON KILLI	GPS AJOON KILLI	A.V.P
29	MUHAMMAD 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 SHAHBAZ KHAN	GPS SHAHBAZ KHAN	A.V.P

17

	GPS HAZ MIAT KILLI	GPS HAZ MIAT KILLI	AVP
	GPS SHIPAI NO 2	GPS SHIPAI NO 2	AVP
	GPS DAN ZAR KOROONA	GPS DAN ZAR KOROONA	AVP
	GPS KALYAN	GPS KALYAN	AVP
138	GPS BOGA KILLI NO 2	GPS BOGA KILLI NO 2	AVP
139	GPS ISLAM ADA GHD	GPS ISLAM ADA GHD	AVP
140	GPS ATTAKI NO 2	GPS ATTAKI NO 2	AVP
141	GPS ATTAKI NO 2	GPS ATTAKI NO 2	AVP
142	GPS ATTAKI NO 3	GPS ATTAKI NO 3	AVP
143	GPS SHAHJADAR FORT	GPS SHAHJADAR FORT	AVP
144	GPS SAJAR GARHI NO 3	GPS SAJAR GARHI NO 3	AVP
145	GPS ATTAKI NO 3	GPS ATTAKI NO 3	AVP
146	GPS SAHJAH GARI	GPS SAHJAH GARI	AVP
147	GPS KODAI NO 2	GPS KODAI NO 2	AVP
148	GPS ATTAKI NO 3	GPS ATTAKI NO 3	AVP
149	GPS MIAN KILLI	GPS MIAN KILLI	AVP
150	GPS ZARWAR KHAN KOR	GPS ZARWAR KHAN KOR	AVP
151	GPS MATHRA NEW	GPS MATHRA NEW	AVP
152	GPS DARGAI	GPS DARGAI	AVP
153	GPS HAMISH GUL KILLI	GPS HAMISH GUL KILLI	AVP
154	GPS HAMISH GUL KILLI	GPS HAMISH GUL KILLI	AVP
155	GPS SHEIKHANO KOROONA	GPS SHEIKHANO KOROONA	AVP
156	GPS AKHONZADGON	GPS AKHONZADGON	AVP
157	GPS PRANG NO 3	GPS PRANG NO 3	AVP
158	GPS KHAT KILLI PRANG	GPS KHAT KILLI PRANG	AVP
159	GPS KODAI SARDARYAB	GPS KODAI SARDARYAB	AVP
160	GPS HASSAN ABAD	GPS HASSAN ABAD	AVP
161	GPS GUL ABAD MERA	GPS GUL ABAD MERA	AVP
162	GPS ZAHID ABAD	GPS ZAHID ABAD	AVP
163	GPS ADAZAI	GPS ABAZAI	AVP
164	GPS MUSLIM ABAD	GPS MUSLIM ABAD	AVP
165	GPS HASSAN ABAD	GPS HASSAN ABAD	AVP
166	GPS CHANCHANO KHAT	GPS CHANCHANO KHAT	AVP
167	GPS GANJI DAG NO 1	GPS GANJI DAG NO 1	AVP
168	GPS LANDI SHAH	GPS LANDI SHAH	AVP
169	GPS QAZI SERAI	GPS GANDHERI PAYAN NO.2	AVP
170	GPSTARNAB SKF	GPSTARNAB SKF	AVP
171	GPS DAMAN BATTAGRAIM	GPS DAMAN BATTAGRAIM	AVP

**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 mis conduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Ser Seniority on lower post will remain intact.

18

any other... included in their service books.  
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  
in the interest of public service with immediate effect.

Sl. No.	NAME & DESIGNATION	PRESENT SCHOOL	POSTED AT	REMARKS
1	Pir Ali SST	GPS Jass Korona	GPS Tala Shah	Single teacher school
2	Phurbat Alam SST	GPS Gul Shah Kili	GPS Bari Band	Adjusted being s/plus
3	Tawad Umar SST	GPS Faran	GPS Safa Bari Band	Adjusted being s/plus
4	Yodur Bari Jan SST	GPS Gul Alam Fand Kili	GPS No 1 Sadat Garhar	N.Basis
5	Muhammad Nawab SST	GPS Gul undal Korona	GPS Randa Rashakar	Adjusted being s/plus
6	Musam Khan SST	GPS Mirza Dher No 1	GPS Hassanzar	N.Basis
7	Bahar Rahman SST	GPS Bah Ullah Korona	GPS Bachyano Kili	N.Basis
8	Misar Ali SST	GPS Landi Shah	GPS Arat Korona	Being disable
9	Zahir Ullah SST	GPS Shabara No 1	GPS Sukkar	N.Basis
10	Muhammad Zahir SST	GPS Shah Nawaz Kili	GPS Behlola Bala	N.Basis
11	Ahmad Farid SST	GPS Azim Gul Mian Kili	GPS Saro Abad	N.Basis
12	Hussain Akhtar SST	GPS Khar Khel	GPS Gonda	N.Basis
13	Shah Farid SST	GPS Nimerai Baba	GPS Sheikh Kili	N.Basis
14	Abdul Rahman SPST	GPS Risaidar Kili No.2	GPS Garhi Hameed Gul	N.Basis

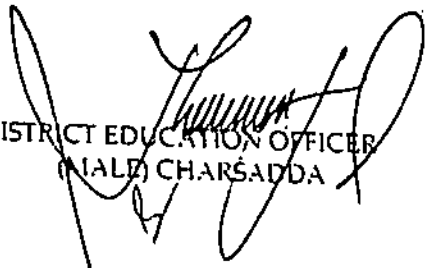
**NOTE:-**

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

(JEHANGIR KHAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAZZA

Endst: No 5420-560 F.No. (Promotion 2020) / Dated 19/105/2020

- 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 (IMU) 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.

  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAZZA

19

THE DISTRICT EDUCATION OFFICER (MALE)  
District Charsadda.

~~21/04~~

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 (BFS-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: **SYED ZAHEER ABBAS**

Designation: SPST

School: GPS SADDAR GARHI NO-3

Contact No:

Signature: 

Date: 20/04/2021

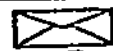
20

(Signature)

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

AT: H

No. 10021,



sdeopri@gmail.com

Dated 22/4/2024

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 & 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, 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 Rashaki
13	Khan Muhammad.	SPST	GPS, Rashaki
14	Zakir Ullah	SPST	GPS, No1,Kodai
15	Shah Muhammad	SPST	GPS Shabaz Khan Killi

21


~~239~~



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

16	Ihsan Ali	SPST	GPS,
17	Muhammad Izhar	SPST	GPS, Hassanzai
18	Asif uillah	SPST	GPS, Sandasar
19	Fathul Amin	SPST	GPS, Haryana
20	Tilawat Shah	SPST	GPS, No1, Sohta
21	Muhammad Asim	SPST	GPS Haji Abad Sreekh
22	Shah Khalid	SPST	GPS, Haji Abad Sreekh
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

Encl. As Above

  
Sub Divisional Education Officer  
(Male) Shabqadar



22  
95

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

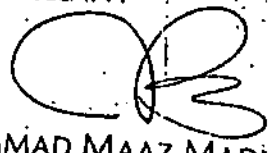
ABDUL MUSAWIR V/S EDUCATION DEPTT.

I N D E X

S. NO.	DOCUMENTS	ANNEXURE	PAGES
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 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

EX-AMIN

17/10



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

ATTENDED

*[Handwritten signature]*

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

ATTESTED

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 earning 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

*[Signature]*  
ABDUL MUSAWIR

Through:

*[Signature]*  
MUHAMMAD MAAZ MADNI  
Advocate High Court, Peshawar

*[Signature]*  
EXAMINER  
Sindh High Court  
Karachi

27


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

  
ADVOCATE



28

**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

ATTESTED

EXAMINED



R

29

~~SECRET~~

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.

*[Handwritten mark]*

**ATTORNEY**  
*[Signature]*  
 District Attorney  
 Government of Punjab  
 Lahore



30

30


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)

  
 EXAMINER  
 Section 10(1)(b)  
 Peshawar  
 30/11/23

Date of Presentation of Application 30/11/23  
 Number of Words 77  
 Copying Fee 35  
 Urgent 35  
 Total not  
 Name of Copypier  
 Date of Copying 30/11/23

**ORDER**  
06.11.2023




31

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.

32

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 Serfal No-41. (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

Syed Zaheer Abbas S/O Syed Sikandar Shah  
(SPST, BPS-14) Government Primary  
School Saddar Ghari No-3, Shabqadar District  
Charsadda

