


# FORM OF ORDER SHEET

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

Appeal No. 1935/2024


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  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. \_\_\_\_\_ / 2024

W. Saif Ahmad

Muhammad

VERSUS The District Education Officer (Male) District Charsadda.

INDEX SHEET

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6	Copies of Schools attendance Register dated 31-05-2014 of appellants	C	10
7	Copies of Service Books of appellants	D	11-12
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Appellant

Through counsel

Muhammad Ismail Khan

Amin Ullah Jan

Amjid Khan Mohmand

Advocates High court Peshawar

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

①

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

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

Wisal Ahmad S/O Lihaz Gul (SPST, BPS-14) Government Primary School Hasan Gul  
Korona, Shabqadar District Charsadda.

.....Appellants...

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/RELEASEING 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 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.

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 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 *Wisal*  
 WISAL AHMAD

Through Counsel *Muhammad Iqbal*  
*M. Iqbal* Advocate

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BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

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

Wisal Ahmad S/O Lihaz Gul (SPST, BPS-14) Government Primary School Hasan Gul  
Korona, Shabqadar District Charsadda.

VERSUS

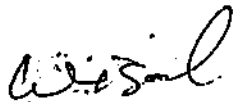
The Director Education Khyber Pakhtun Khuwa Peshawar and others

Certificate.

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


Appellants

APPELLANT



Through  
Wisal Ahmad

Through Counsel



Muhammad Ismail  
Advocate



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

6

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

Wisal Ahmad S/O Lihaz Gul (SPST, BPS-14) Government Primary School Hasan Gul  
Korona, Shabqadar District Charsadda.

.....Appellant

VERSUS

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

.....Respondents

AFFIDAVIT

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

Deponent Wisal Ahmad

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) CHARSADDA

**APPOINTMENT**

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST School based/Ad hoc based in RPS-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
01/11/11	WISAL AHMAD CN:001-4118397-3	GPS Hassan Gul Kor	M.M Khel	106.07

**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.

970

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: 4807-4958 /Dated: Charsadda the 31/5/2014

Copy forwarded for information and necessary action to the:-

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

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

فاریک دیرده

سید

HEAD MASTER  
G.P.S Hassan Gil Kot  
Mairat Raughnai Khel  
A2  
31/5/2017

فاریک دیرده

فاریک دیرده (مردانه) فاریک دیرده  
من کی وصال اوج و دلخواهی بجای فاریک دیرده 31  
48074958  
31/5/2017  
فاریک دیرده  
فاریک دیرده

فاریک دیرده

Mark B

(D)

(9)

(2)

Date		Time		Location		Remarks	
24	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
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21	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
20	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
19	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
18	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
17	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
16	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
15	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
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8	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
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6	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
5	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
4	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
3	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
2	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
1	12/12/2014	10:00	11:00	10:00	11:00	10:00	11:00

Director  
15-12-2014  
ASD/DC  
Circ  
Sec

10	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
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7	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
6	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
5	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
4	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
3	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00
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1	11/12/2014	10:00	11:00	10:00	11:00	10:00	11:00

AMT

10

*Handwritten notes at top left*

ANN + (D)

(11)  
(12)

The entries in this page should be renewed or re-attested at least every five years and the signature in lines 1 and 10 should be dated.

Name: LULIAL Ahmad

Race: Afghan

Residence: village P-o Natta Tch Shabqadar  
Distt Charsadda

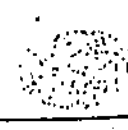
Father's name and residence: Chaz Cui -


Date of birth by Christian era as nearly as can be ascertained: (8/3/1986) -  
eight March Nineteen Eighty Six

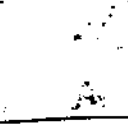
Exact height by measurement: 5-6


Personal marks for identification: nil


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

Little Finger  Ring Finger

Middle Finger  Fore Finger

Thumb 

Signature of Government Servant: 

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

ASDEO (M)  
Shabqadar  
Circle (Chd)



ANNEX (E)

Res

13

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 2018) and Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. 50 (S/F/E & S/D/3 // 2018 / 5111 / 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 UPS 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.

Sl	Roll No. NTS	Name and Father Name	CNIC No	Name of School	Total Marks out of 100	UC	Appointment order No & Date	Date of Taking Over Charge	Lesson No & Date
1	1540010	M. Muhammad Khalid S/O Yusuf Ali	17102-6517201-5	GPS Sistan Kala	132.89	Abazai	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
2	1540071	Muhammad Ali S/O Saad Gul	17101-9786211-5	GPS Sheer Ali Kala	121.71	Agra	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
3	1540014	Muhammad Ali S/O Khan Afzal Khan	17101-8844811-5	GPS Agra Bala	116.33	Agra	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
4	1540130	Muhammad Amir S/O Israr Muhammad	17101-9124159-3	GPS Agra Bala	114.58	Agra	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
5	1540163	Muhammad Shah S/O Wajid Shah	17101-0111896-5	GPS Mandera	133.54	Battagram	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
6	1540141	Muhammad Shoaib S/O Feroz Muhammad	17101-0311588-7	GPS Ashwa	129.68	Battagram	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
7	1540194	Shah Anwar S/O Rahim Khan	17101-0292595-3	GPS Marwat	124.28	Battagram	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
8	1540115	Muhammad Aamir S/O Pervez Khan	17101-7491491-7	GPS Marwat	123.45	Battagram	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
9	1540110	Shah Anwar S/O Sajid Shah	17101-4417180-5	GPS Marwat	119.1	Battagram	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
10	1540107	Naseer Khan S/O Nadeem Khan	17101-0307493-1	BPS Charsadda	125.48	Bahawal	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
11	1540145	Muhammad Ishaq S/O Muhammad Nadeem	17101-3765811-7	GPS Anwar Shah No 6	132.54	Bahawal	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
12	1540127	Farooq Khan S/O Farooq Khan	17101-2716799-9	GPS Sheer Ali Kala	132.78	Bahawal	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
13	1540164	Muhammad Ali S/O Usaid Khan	17101-8172887-5	GPS Islam Abad Dera	129.83	Dargu	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
14	1540154	Muhammad Ali S/O Farooq Khan	17101-0300769-8	GPS Marwat	118.45	Daud Pura	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
15	1540109	Muhammad Usaid S/O Abdul Qadir	17101-6178115-7	GPS Mandera	116.29	Daud Pura	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
16	1540114	Asad Ullah S/O Fareed Ali Shah	17101-0876185-1	GPS Daud Pura	114.81	Daud Pura	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
17	1540115	Umar Gul S/O Farooq Gul	17101-4375764-1	GPS Anwar Shah-2	121.66	Dera Ismail Khan	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
18	1540121	Abdurahman S/O Rehman Gul	17101-0343215-1	GPS Anwar Shah	114.33	Dera Ismail Khan	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
19	1540154	Dawood Mansoor S/O Farooq Mansoor	17101-0312797-7	GPS Kohat	104.56	Dera Ismail Khan	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
20	1540138	Zohar Ali S/O Muhammad Ali	17101-0260821-7	GPS Dera Ismail Khan	116.17	Dera Ismail Khan	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
21	1540190	Muhammad Gulzar S/O Mirza Khan	17101-2719656-1	GPS Marwat	111.13	Dera Ismail Khan	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
22	1540148	Farooq Muhammad S/O Ali Muhammad	17101-1671334-1	GPS Sheer Ali Kala	117.17	Dera Ismail Khan	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
23	1540116	Shahid Ali S/O Farooq Shah	17102-2470651-9	GPS Dera Ismail Khan	123.06	Gandhari	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
24	1540105	Waqar Khan S/O Mustafa Khan	17101-5481178-3	GPS Marwat	116.54	Chunda Kariana	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017
25	1540164	Kamran Ullah S/O Arif Rehman	17101-0119790-9	GPS Marwat	115.09	Chunda Kariana	4807-4958 Dated 31/05/2014	01-09-14	23914-24014 Dated 28/04/2017



26	1561023	Shams Ur Raq S/O Saira Fatima	GPS Bait Khan	105.2	105.2	17101-1837398	GPS Bait Khan	105.2	105.2	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
27	1560135	Ramzan S/O	GPS Daba Wali	122.25	122.25	17101-0154096	GPS Daba Wali	122.25	122.25	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
28	1561823	Ab Gaur S/O Zameer Qad	GPS Makhmad	113.8	113.8	17101-0211851	GPS Makhmad	113.8	113.8	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
29	1561757	Amir Zeb S/O Umar Khan	GPS Hali Qad	124.5	124.5	17101-3704291	GPS Hali Qad	124.5	124.5	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
30	1560096	Imad Ab S/O Khan Shauq	GPS Khan	128.94	128.94	17101-1822881	GPS Khan	128.94	128.94	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
31	1560844	Muhammad Iqbal S/O Ali	GPS Hali Qad	127.63	127.63	17101-1845983	GPS Hali Qad	127.63	127.63	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
32	1560844	Nasim Khan S/O Faisa	GPS Salma	122.13	122.13	17101-0195641	GPS Salma	122.13	122.13	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
33	1561781	Mirad Khan S/O Qadir Khan	GPS Khat	115.15	115.15	17101-0162752	GPS Khat	115.15	115.15	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
34	1560056	Imad Khan S/O Qad	GPS MS Qad	124.44	124.44	17101-2870858	GPS MS Qad	124.44	124.44	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
35	1561043	Shir Ab S/O Hali Qad	GPS Khan	111.82	111.82	17101-0216660	GPS Khan	111.82	111.82	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
36	1560958	Imad Khan S/O	GPS Chahar	124.02	124.02	17101-0182224	GPS Chahar	124.02	124.02	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
37	1560097	Faisal Khan S/O Raah Ali	GPS Dabhar	116.54	116.54	17101-0194853	GPS Dabhar	116.54	116.54	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
38	1561448	Imad Muhammad S/O Imad	GPS Khan	113.88	113.88	17101-2984827	GPS Khan	113.88	113.88	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
39	1560052	Nasim Khan S/O Qadir Khan	GPS Hali Qad	115.19	115.19	17101-0194844	GPS Hali Qad	115.19	115.19	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
40	1560105	Amir Khan S/O Imad	GPS Hali Qad	99.25	99.25	17101-0211182	GPS Hali Qad	99.25	99.25	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
41	1561211	Imad Khan S/O	GPS Hali Qad	96.43	96.43	17101-0206254	GPS Hali Qad	96.43	96.43	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
42	1561772	Baiti S/O S/O S/O	GPS Chahar	122.21	122.21	17101-2524410	GPS Chahar	122.21	122.21	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
43	1560774	Imad S/O	GPS Hali Qad	120.88	120.88	17101-0227824	GPS Hali Qad	120.88	120.88	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
44	1561185	Shir Ab S/O	GPS Hali Qad	105.58	105.58	17101-0168708	GPS Hali Qad	105.58	105.58	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
45	1560131	Zameer Khan S/O	GPS Chahar	128.92	128.92	17101-0110390	GPS Chahar	128.92	128.92	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
46	1560150	Amir Khan S/O	GPS Hali Qad	122.02	122.02	17101-0253268	GPS Hali Qad	122.02	122.02	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
47	1560715	Imad Khan S/O	GPS Hali Qad	119.84	119.84	17101-2248299	GPS Hali Qad	119.84	119.84	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
48	1561213	Muhammad Khan S/O	GPS Hali Qad	119.22	119.22	17101-1808272	GPS Hali Qad	119.22	119.22	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
49	1561441	Imad Khan S/O	GPS Hali Qad	112.48	112.48	17101-0056224	GPS Hali Qad	112.48	112.48	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
50	1560786	Imad Khan S/O	GPS Hali Qad	131.51	131.51	17101-0148282	GPS Hali Qad	131.51	131.51	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
51	1561038	Amir Khan S/O	GPS Hali Qad	124.18	124.18	17101-1407038	GPS Hali Qad	124.18	124.18	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
52	1561257	Imad Khan S/O	GPS Hali Qad	114.22	114.22	17101-2275229	GPS Hali Qad	114.22	114.22	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
53	1561182	Imad Khan S/O	GPS Hali Qad	105.98	105.98	17101-0482228	GPS Hali Qad	105.98	105.98	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
54	1560055	Imad Khan S/O	GPS Hali Qad	104.98	104.98	17101-0232214	GPS Hali Qad	104.98	104.98	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
55	1560743	Imad Khan S/O	GPS Hali Qad	122.21	122.21	17101-2278222	GPS Hali Qad	122.21	122.21	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
56	1560743	Imad Khan S/O	GPS Hali Qad	122.21	122.21	17101-2278222	GPS Hali Qad	122.21	122.21	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
57	1560743	Imad Khan S/O	GPS Hali Qad	122.21	122.21	17101-2278222	GPS Hali Qad	122.21	122.21	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014
58	1561250	Imad Khan S/O	GPS Hali Qad	118.24	118.24	17101-2422427	GPS Hali Qad	118.24	118.24	4807-4958	4807-4958	01-09-14	01-09-14	23918 24014	23918 24014	01-09-14	01-09-14	23918 24014	23918 24014

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OFFICE OF THE DISTRICT EDUCATION OFFICER  
(M.A.E) E&SE CHARSADDA

091-9220431 [amishcharsadda@yahoo.com](mailto:amishcharsadda@yahoo.com)

OFFICE ORDER

Amk (F)

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SKF  
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Consequent upon recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No 2412-0542 Promotion / Estab Dated Peshawar the 21/01/2013, the following Primary School Teachers (BFS-12) are hereby promoted to the post of SFST (BFS-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

Sl#	NAME	PRESENT SCHOOL	POSTED AT	REMARKS
1	SHER MUHAMMAD KHAN	GPS GANDERI BALA	GPS PALAY DOBANDI	AVP
2	MINHAJ ULLAH	GPS AMBA DHERI- NO.2	GPS AMBA DHERI- NO.2	AVP
3	AZRA 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	IFTIKHAR ULLAH	GPS MARCHAKI	GPS MARCHAKI	AVP
9	MUSLIM SHAH	GPS INAM KILLI	GPS LANDAI SHAH	AVP
10	MUHAMMAD YOUSAF	GPS KULA DHER NO.1	GPS KULA DHER NO.1	AVP
11	ADLAM KHAN	GPS KHORA ABAD	GPS KHORA ABAD	AVP
12	MUTTAPALI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	AVP
13	MUHAMMAD ULLAH	GPS ISLAM ABAD DARGAJ	GPS ISLAM ABAD DARGAJ	AVP
14	HAFI M JAN	GPS KASS KOROONA	GPS KASS KOROONA	AVP
15	HASEEN KHAN	GPS KHISRO KHAN KILLI	GPS SHAHNAWAZ KILLI	AVP
16	TILAWAT SHAH	GPS MANDEZAI	GPS MANDEZAI	AVP
17	MUHAMMAD KHALID	GPS STATION KOROONA	GPS GHULAM FARIQ KILLI	AVP
18	WAJIB ULLAH	GPS PALOSA JADEED	GPS PALOSA JADEED	AVP
19	MUHAMMAD ISHTIAQ	GPS MERA SHAKH- NO.8	GPS BEHLOLA	AVP
20	ABDUL MUSAWIR	GPS ANGAR KOROONA	GPS ANGAR KOROONA	AVP
21	SHAKIL 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 SHOAIB	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	AVP
25	SAHIB KHAN	GPS MIAN SAHIB GUL KILLI	GPS MIAN SAHIB GUL KILLI	AVP
26	JAWAD ALI	GPS KHUBAI	GPS KHUBAI	AVP
27	ZULFIQAR ALI	GPS CHAMYARAN	GPS CHAMYARAN	AVP
28	KAMAM ELAIN	GPS AJDON KILLI	GPS AJDON KILLI	AVP
29	MUHAMMAD SHAH	GPS RIZWAN ABAD	GPS RIZWAN ABAD	AVP
30	YASIR KHAN	GPS INAM KILLI	GPS INAM KILLI	AVP
31	MUHAMMAD KHAN	GPS SHAHBAZ KHAN	GPS SHAHBAZ KHAN	AVP

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NO	NAME	GPS NAME	GPS NAME	AVP
1	USMAN ALI	GPS SHEKH ABAD RAJJAR	GPS SHEKH ABAD RAJJAR	AVP
2	HAZAR KHAN	GPS MALKA DHER	GPS MALKA DHER	AVP
3	FATMUL AMIN	GPS DHER SIKANDER KHAN	GPS DHER SIKANDER KHAN	AVP
4	MIAN ADH SHAN	GPS AGRA BALA	GPS AGRA BALA	AVP
5	IKRAM LY MALI	GPS AMBA DHER NO 1	GPS AMBA DHER NO 1	AVP
6	ZAFAR ALI	GPS DOSEHRA-NO 3	GPS DOSEHRA-NO 3	AVP
7	ASIF SHAH	GPS SHALMANG KILLI	GPS SHALMANG KILLI	AVP
8	BHAD MUHAMMAD	GPS HARYANA	GPS HARYANA	AVP
9	NAEEM JAN	GPS YAKH KOHI	GPS YAKH KOHI	AVP
10	MUHAMMAD SHAHZAD KHAN	GPS KASS KOROONA	GPS KASS KOROONA	AVP
11	AZMAT MUJAJ	GPS MARCHAKI-2	GPS MARCHAKI-2	AVP
12	HSAN ULLAH ALIAS ABAD	GPS UMAR ABAD CHD	GPS UMAR ABAD CHD	AVP
13	ARSHAD KHAN	GPS KOTAK	GPS KOTAK	AVP
14	MUHAMMAD ZEESHAN	GPS KHAT KILLI PRANG	GPS KHAT KILLI PRANG	AVP
15	AMRAN ULLAH	GPS MALKA DHER	GPS MALKA DHER	AVP
16	RASOOL SHAH	GPS PRANG- NO 3	GPS PRANG- NO 3	AVP
17	MUHAMMAD AMIN	GPS AGRA BALA	GPS AGRA BALA	AVP
18	SHAH MUHAMMAD	GPS YAR JAN KOROONA	GPS YAR JAN KOROONA	AVP
19	ASOUR RAHMAN	GPS JAN ABAD	GPS JAN ABAD	AVP
20	SAEED KHAN	GPS MITTA MUGHAL KHEL	GPS MITTA MUGHAL KHEL	AVP
21	ASIF ULLAH	GPS DAULAT PURA	GPS GAGER	AVP
22	MUHAMMAD SAJJAD	GPS GHUNDAI KOROONA	GPS GHUNDAI KOROONA	AVP
23	DILAWAR SHAH	GPS BOSA KHEL PRANG	GPS BOSA KHEL PRANG	AVP
24	ISHTIQ AHMAD	GPS MIAN SAMIB GUL QALA	GPS DILBAR GARHI	AVP
25	ROOHUL AMIN	GPS DAGSHAMOZAI	GPS DAGSHAMOZAI	AVP
26	ATTA ULLAH NOOR	GPS NISHAN ABAD	GPS NISHAN ABAD	AVP
27	ZIA ULLAH	GPS INZER QALA	GPS INZER QALA	AVP
28	YASIR KHAN	GPS MANDANI	GPS MANDANI	AVP
29	NAZIR AHMAD	GPS MARDHAND NO -1	GPS MARDHAND NO -1	AVP
30	OWAIS ULLAH	GPS SULAI KAMAR	GPS SULAI KAMAR	AVP
31	ZAINUL ABIDEEN	GPS SARKI TITARA-NO. 1	GPS SARKI TITARA-NO 1	AVP
32	JAMIL MUHAMMAD KHAN	GPS TARIQ ABAD	GPS TARIQ ABAD	AVP
33	MUHAMMAD GULZAR	GPS SHAH DHAND	GPS SHAH DHAND	AVP
34	SHAHAB ALI	GPS GANGOO	GPS GANGOO	AVP
35	MANZOOR ALI	GPS GUJRANO KILLI	GPS GUJRANO KILLI	AVP
36	MAJID SHAH	GPS RHMAT ULLAH KOROONA	GPS RHMAT ULLAH KOROONA	AVP
37	AFTAB AHMAD	GPS CHITLA DHERI	GPS HAJI ABAD UMARZAI	AVP
38	ASFANDIYAR	GPS PRANG- NO 3	GPS PRANG- NO 3	AVP
39	ZAHOR AHMAD	GPS SHERPAO NO. 1	GPS SHERPAO NO 1	AVP
40	FARHAD ALI	GPS KATIGAN	GPS KATIGAN	AVP
41	MUHAMMAD BASIR	GPS WARDAGA- NO 1	GPS WARDAGA- NO 1	AVP
42	ADNAN KHAN	GPS CHECK RAJJAR	GPS CHECK RAJJAR	AVP
43	KHAN MUHAMMAD	GPS RASHAKAI	GPS RASHAKAI	AVP
44	AMJID ALI	GPS DARGAI	GPS DARGAI	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	POSTED AT	REMARKS
1	Riaz Ali SPST	GPS Kass Korona	GPS Tale Shah	Single teacher school
2	Khurshid Akbar SPST	GPS Gul Shah Kili	GPS Bari Bano	Adjusted being s/plus
3	Jawad Khan SPST	GPS Fagan	GPS Safo Bari band	Adjusted being s/plus
4	Abdul Bari Jan SPST	GPS Ghulam Farid Kili	GPS No.1 Sedar Garhut	N.Basis
5	Muhammed Sajjad SPST	GPS Ghindai Korona	GPS Baida Rashkal	Adjusted being s/plus
6	Muslim Khan SPST	GPS Mirza Dher No.1	GPS Hussain ul	N.Basis
7	Tahir Rahim SPST	GPS Rafi Ullah Korona	GPS Pechyano Kili	N.Basis
8	Mirza Ali FST	GPS Landi Shah	GPS Arat Korona	Being disable
9	Zahir Ullah SPST	GPS Shabara No.1	GPS Sukkar	N.Basis
10	Muhammad Zahoor FST	GPS Shah Nawaz Kili	GPS Behlola Baln	N.Basis
11	Aziz ur Rahim SPST	GPS Azim Gul Mian Kili	GPS Saif Abad	N.Basis
12	Hubaib Akhtar SPST	GPS Khan Khe	GPS Genda	N.Basis
13	Ushah Jehan FST	GPS Nimoral Baba	GPS Saeed Kili	N.Basis
14	Abdur Rahman SPST	GPS Risaidar Kili No.2	GPS Garhu Harneed Gul	N.Basis

**NOTE:-**

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

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

Encl: No. 5420/5602 / E.No. (Promotion 2020) / D. No. 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 (DMO) 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

Ans (G)

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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: Musawir Ahmad

Designation: SPST

School: GPS Hasan Gul Korona

Contact No 03368881253

Signature: Musawir

Date: 20/04/2024

20/04/24

AMX (H)

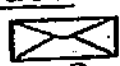
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Office of the Sub Divisional Education Officer  
(Male) Shabqadar Charsadda

~~2024~~

AMX 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**

Memorandum


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 Muhmmadi Khan
6	Zia Rafiq	SPST	GPS, Katozai No.3.
7	Naseem Khan	SPST	GPS Mir Zai
8	Zubair Khan	SPST	GPS Shabaz 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 Rashakai
13	Khan Muhammad.	SPST	GPS, Rashaki
14	Zakir Ullah	SPST	GPS, No1,Kodai
15	Shah Muhammad	SPST	GPS Shabaz Khan Killi

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

16	Ihsan Ali	SPST	GPS,
17	Muhammad Izhar	SPST	GPS, Hassanzai
18	Asif ullah	SPST	GPS, Sandasar
19	Fathul Amin	SPST	GPS, Haryana
20	Tilawat Shah	SPST	GPS, No1, Sohta
21	Muhammad Asim	SPST	GPS Haji AbadSreekh
22	Shah Khalid	SPST	GPS, Haji AbadSreekh
23	Syed Masood Ahmad	SPST	GPS,NO2 Attaki
24	Mohibullah	SPST	GPS.NO 2. Attaki
25	Bakht Taj Gul	SPST	GPS Kabaley Shabqadar
26	Syed Ziauddin Badshah	SPST	GPS Daryab Korona
27	Seeed Khan	SPST	GPS Matta Mughal Kbel
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



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

ANNEX (1)

22

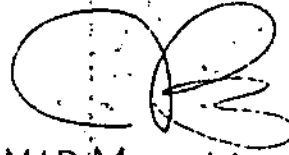
ABDUL MUSAWIR V/S EDUCATION DEPTT.

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
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2.	Appointment Order dated 31.05.2014	A	6-7
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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 Road, Peshawar.

0333-9313113, 0345-9090737

[muhhammad.m3adv@gmail.com](mailto:muhhammad.m3adv@gmail.com)

APPEAL NO. 7597 /2021

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

APPELLANT

VERSUS

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

RESPONDENTS

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

PRAYER:

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

*Respectfully Submitted,*

FACTS:

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

*[Handwritten signature and date 20/7/21]*

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

Copy of Appointment Order dated 31.05.2014 is attached as Annexure .....

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

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

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.

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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:

GROUNDS:

- 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

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

- (26)
- E- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which: *'the state is bound to eliminate disparity in the income and earnings of individuals including persons in the various service of Pakistan.'* Thus in light of the above the respondents are duty bound to release the annual increment for the year 2014, as well as the monthly salaries for the month of June, July & August 2014.
- F- That, the respondents acted in arbitrary and malafide manner while illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014.
- G- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is nothing but depriving the appellant from legal right of livelihood.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 15-10-2021

APPELLANT

ABDUL MUSAWIR

Through:


MUHAMMAD MAAZ MADNI  
Advocate High Court, Peshawar

CERTIFICATE

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


(10)

(27)

  
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:

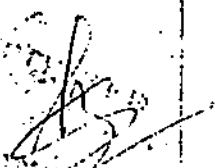
Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.

  
ADVOCATE

LIST OF BOOKS:

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





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**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



*[Handwritten signature]*

SECRETED  
*[Handwritten signature]*



29

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.


  
 DISTRICT ATTORNEY  
 DISTRICT JUDICIAL OFFICE  
 DISTRICT HEADQUARTERS  
 DISTRICT JUDICIAL OFFICE



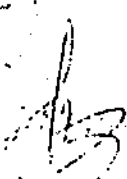
6. Perusal of record reveals that appellant was appointed as Primary School Teacher vide appointment order dated 31.05.2014 and it is admitted fact that appellant submitted his arrival report on the same day i.e 31.05.2014. He was regularized from the date of his appointment vide notification dated 15.03.2018. 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.

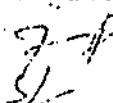
7. For what has been discussed above, the appeal in hand is allowed as prayed for and the appellant is held entitled to all back benefits. Costs shall follow the events. Consign.

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)

  
 30/7/23

  
 30/7/23

30/7/23

30/7/23  
 30/7/23

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 Banu)  
Member (J)

ABDUL J

32

To

The Director Education

Elementary and Secondary Education KP Peshawar.

Departmental Appeal

ABDUL J

- 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-53. (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

Wisal Ahmad S/O Lihaz Gul *WTS*  
(SPST, BPS-14) Government Primary  
School Hasan Gul Korona Shabqadar

بعدالت حنا حیدر (عمر صاحب) کے لیے

33

Appellant

2 پنجاب

وصولی بنام فی البرکت FBR کے خلاف

موردہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکہ

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

حنا حیدر صاحبہ

کیلئے جن (السید) کے نام سے

آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ از مرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے

سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا دکالت نامہ لکھ دیا کہ سند ہے۔

وصولی بنام فی البرکت

المرقوم

ماہ

20

Accepted

Handwritten signature and text