FORM OF ORDER SHEET

Court or	·····		
Appeal No.	1029	/2024	

	<u>Ap</u>	peal No. 199 /2024
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2024	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.
	, .	
		By order of the Chairman
	,	
ļ. 		
•	1	
!	:	
	,	
<u> </u>		
	_	

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. 1934 / 2024

Sher Ali

AC

VERSUS The District Education Officer (Male) District Charsadda.

INDEX SHEET

S.No	Descriptions	Annexture	P.No
1	Memo of Appeal		1-2
2	Affidavit	1	6
3	Notices to Parties		
. 4	Copies of appointments orders of Appellants dated 31-05-2014	Α	7-8
5	Copies of appellants Charges Reports dated 31-05-2014	В	9
6	Copies of Schools attendance Register dated 31-05-2014 of appellants	C	1.60-61.
 	Copies of Regularization Order of appellants	D	12-14
8:	Copies of Promotion Order of appellants	E	12-17
9	Copies of applications/request to SDEO/DEO	F	18
10	Copy of SDEO Letter to DEO	G	19-50
11	Copy of same identical nature case service appeal No- 7597/2021 decided on dated 06-11-2023 by Kp Service Tribunal	H	21-26
12	Copies of Departmental Appeal	<u> </u>	39
1	Wakalat Nama	-	30

Appellant

Through counsel

Muhammad Ismail Khan

Amin Ullah Jan

Amjid Khan Mohmand

Advocates High court Peshawar

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

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 1939 /2024

Sher Ali S/O Hafiz Ullah (SPST, BPS-14) Government Primary School Kangra Shabqadar District Charsadda

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

.....Appeilant...

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 CHARSADDA, WHEREAS THE DEPARTMENT NOT GIVEN ANY RESPONSE TO APPELLANTS.

PRAYERS.

!] ,

ON ACCCEPTANCE 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 Appellanta 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.

र: र |

•

2

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)
- 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)
 - 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 reason s were silent on the appellant appeals.
- 13. That feeling aggrieved by all the appellants, and having no other remedy except filing this service appeal on the followings grounds.

GROUNDS:

- A. That the act and omission of the Respondents by illegally deducting annual increment for the year 2014, and not releasing the monthly salary for the month of June, July and August 2014, is against the law, facts material available on records and norms of natural justice hence not tenable in the eyes of la and is liable to be struck down.
- B. That the appellants has not been treated by the respondents department in accordance with ;aw 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.

٠,٢-

- 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 ACCCEPTANCE 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

Sher Ali

Through Counsel

Muhammad - Ismail

Adoveste.

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO	/2024
-------------------	-------



Sher Ali S/O Hafiz Ullah (SPST, BPS-14) Government Primary School Kangra , 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

shertle

Sher Ali

Through Counsel

Mulemmed . Igneil.

Adrouse.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR



Service Appeal No._____/ 2024

Sher Ali S/O Hafiz Ullah (SPST, [Shabqadar District Charsadda	BPS-14)	Government	Primary	School	Kangra
				Anne	llont

VERSUS

- 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. Sher Ali S/O Hafiz Ullah (SPST, BPS-14) Government Primary School Kangra , 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.

IDENTIFIED BY

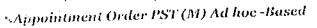
Muhammad Ismail Advocate High Court Deponent

Through counsel

Ismail Khan Umar Khan

Amjid Khan Mohmand

Advocates High court Peshawar







OFFICË 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 appointment of the following continues are acrossly a new an against the post of the based/UC based in BPS-12 (Rs: 7000-500-22000) (Rs: 7000/= fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge :-

. S.#	Name SHERALI	Schaol Name U/C GPS Kangra Kangra	Score 131.62
41/144 	17101-8836640-3		

TERMS & CONDITIONS.

- NO TA/DA etc is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year.
- They should not be handed over charge if they exceed 35 years or below 18 years of 30 1.1.
- Appointment is subject to the condition that the certificate/documents must be representation to a subject to the condition that the certificate accuments must be verified from the concerned authorities by the DEO(concerned) Any one found producing hogus Certificate will be reported to the law enforcing agencies for the terms of the conformal agencies for the terms. 5.
- 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.
 - Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
- 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 s. appointment will expire automatically and no subsequent appeal etc shall be entertained..
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge. o.
- Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
- the will be governed by such rides and regulations as may be issued from time to time by the Goot.
- 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 preceded under the rules framed from time to time.

\Sher Alf Kangra.docx.





- 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. } 13.
 - Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

(Siraj Muhammad) District Education Officer (Male) Charsadda

Endst: No. 11807-1958

Charsadda the. 21/

Copy forwarded for information and necessary action to the
1. Director E&SE Deptt: Khyber Pakhtunkhwa Pesnawar.

2. Deputy Commissioner Charsadda

3. District Accounts Officer Charsadda

4. SDEO (M) Charsadda

5. SDEO (M) Tangi

6. Official Concerned

7. M/File

7. M/File

District Education Officer (Male) Charsadda

- ANSher Ali Kangra.docx

4102/50/18 Hally days against was the 215 (Suo (m) med in 181 (m) de 2, 5 (195) ~ 20 M. 161 12 30 m 130 6/20 = photos sets for in recording 3 10 mm 1 100 mm 3 20 (11) 12d 18m2 3 km 2 2 12 14. \$.50° (an) 30° 30° 10° 50° 1 . 8564-6084 12 - 46 6 18 2) HOT 6 25 Change he part

	er.ia	رجسٹر ھاضری مدر سین		رجسٹرحاضری ئیدر سین ^{بن} سید	
•	التعرفان -	عَشِقَ النَّهِ الْمُعَالِينِ اللَّهِ الْمُعَالِينِ اللَّهِ الْمُعَالِينِ اللَّهِ الْمُعَالِينِ اللَّهِ الْمُعَا	SPST - PS	اعسان اللهُ قریش میان شنان حسن منزیغ 5 SPST: PS1	<u>از الآه لوب الريش</u> PSH1 - المنطقة ال
÷	Charles for the formal and the following of the following	A CO	SPST TO THE PROPERTY OF THE PR		AND
		11.2 (1-17.2) (16.5 16.5) (16.4) 7.00 11.1 (1-17.3) (16.5) (1.5) (16.4)	7125	11.20 -1 - 1011/10 1997 1938 - 1	10 - co - -
	بایق عیران دال سایق میران ا	المائد المجان عال عابد المجان عال الم	2004 04 -	117:ed - 10-1011 349, 143	

In pursuance of The Khyber Pokhtunkhwa Employees of the Elen In pursuance of The Khyber Pokhtunkhwa 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. 30 (3/F)E & SED/3-2/2018 / SITT Secondary Education Department Govt of Khyber Pakhtunkhwa Notification No. 30 (3/F)E & SED/3-2/2018 / SITT //Contract died Peshawar the 16/02/2018, services of the following (433) Primary School Teachers appointed //Contract deed 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 neither by regularized in 8PS-12, on the same posts in Teaching Codre on tic terms and condition given below with effect from the date of their appointment as metioned application in the interest of dublic service. & Secondary Education appointment as metioned against earn in the interst of public service.

•		1 .			· i	10.0						i
-	14	Tall (FE HT)	frame and Frider Mame		A K No	المحمد أب معرج	1864 Marks Marks 200	uv.	Appearance State No. 6 Date	Buto al Touing Over Chicker	Estynginge for & Only	
İ	- <u>-</u>	 :**2039	Madernatic Holle S/O Tours of AS	17103	45):77:	5° 2. w. /-2	172 80	4464	#807-493# Come(11/49/2214	02-09-11	21739-14018 Det-0:21/04/2017	ŀ
ŀ		; 6-2071		3101		CPS & end. File	117.71	AUI	0007 4958* Oscuption 5 1014	01-07-14	23938-34078 Dece::24/04/2017	
۱.		194. 4	VERTER AS S/O SERVE GUE VERT / 48 Shirt S/O MELA	17101	100	,		,	(807-9730 (Barrel) (105/2014)	, ¢1-cn-14	(3934-, 1) 75 (36147-/14/04/2017	į.
1		1581940	Affay SE to 41 a	17101	Juliusie	821 Aug Beh	.	Arriva de la compansión	6#07-1956 Oxford:1//05/7014	01-09-14	23936-24079 Deter:18/04/2017	
		— ¦	Tay - at Shirt 5/0	1,121	211894	CPS Agri Bala.	134,58	Attr	4807-4958	01409-14	23930-24078 Usang 24/04/2017	
-	<u>`</u>	1560161	S.Western Shah	:	3 ·	G. S. Mary distri	£2.65	Bettestere	Dates: 1/05/2014		73911-74074	:
Į	•	1540941	Maheriers & Sneuto S/O Ficto Analise romani	11101	7	· (F.Astyn	129.64	. patragram '	4807-4958	G1- 07- 34	- 22928-24078	
ı	,	(Siegro	Shiph Admor SAO RUMM Chan	17101	1	GPS Marwill	120,34	Bettegrown	- Dated:31/C3/2014	01-01-14	htmd:74/34/2217	
.		1560125	Multistamed Asim SITI Person Line	1710	7497493- 7	GFS MADES PAR	17).41	Sattle printer	0507-4934 0504-31/03/2014	. C1-09-14	23538-74078 Ostes:28/04/2017	
ļ		:561130	Shirk Child MO Laider	1730		gys Gruden Codesym	119.3	. Balligram .	0619031/05/7014	 61-09-14	Option: 54(04/3313	
ŀ		1500007	State Name English NO MEGA		0107003	-:	135.45	ga-randa	4AC7-4958 Chive:31/US/1014	0149-14	23838-24278 Sector:28/04/7477	Į,
1		1560145	Multinament timben \$40	 	3-17-ESM1)-	GP3 NGs - Shelle		F-1345	. 4807-4938 Onlog(11/05/7014	67-69-14	33428;54138 Onder 20/04/2017];
٠	".	13601-2	Nauhammad Habi	 		No. 6	137,54		4907-1754) 193a-2 4J70	
1	ı,	190003	Tabera Usen MO famed Chan		<u> </u>	GPS She Leaden	131.10	gurests.	Onto#31/05/2014	2140-14	Dates/18/06/7011 21938-24079	H
	11	2761564	ASSTURENCE AND ASSESSED.		3	GPS titls to Admid De-gal	115.63	Dergal	Out-08:31/05/2014	33-69-14	23938-24074	1
	۱.	2563234	sautummed AB MO Facile	1710	1-0300730-	tur s reshard	1; LG	MALAN.	4807-491P Onted:12/05/3014	01-09-14	OH4434/04/1013	ļ
1	15	(502109	Itters us men tift about	1718	1-4176, 41	Lars sprippeter	116.79	(Invited Puris	1 4807-4958 Detrocht/S/S/2014	03-09-14	719/40/45 (mins)	`
		isotre.	And their SE November Al	,,,	1 0176] 4				0ates 11/05/1014 .	g: 99-14	(1975 - 20378 (1975 - 2070/13)/17*	
:	<u> </u>	1540175	Ghan .		11-6375744		7	Uneri Zardidi	4827-4958 Onive 11/05/12/4	51-09-34	Jane Tagelland	⅄
. :			The state of the s	1 J.	1 0111115	. ;	·. •		4807-4754	\$1476.24	Care MANION	
- 1	10], (1631)] 	Remotes Gul	ب	4	GP3 ton Abad	114.1)	Destricts	Onted.11/01/2014		13434-34231	1
		1560154	Open out Alsoed 5/0 Facil Marged	L	-1	. C#1 is.n.	1111	maile dis	Sierres	3057.12	3416-74274 3916-74274	
		ine i	Control SIO REPORTED	1110	nientara i	ti en amper	1112	A lime.	0.014.2014	200.00	OUTPO PARTIES ALL	
,	73.	196310	Marie Challe		12 118	allegi (X.). Allegi (X.)	111.11	1.17	4127-012		Transcriptory Sit	ļ,
1+	127	156100	lamed Madratricas in Side	iu	n dřiji.		ľ×.	Donakte	A207,495V	. £01.00-14.	23418.24042014 Species (40042014	
:	11	2352156	SALLERI AMERICA STO	14.	12-1670551	4		Congred	Diction11/2014	9149-14	23138-34078 Universal/04/2017	1
•	-	(94/97)	Fergon Snah		11 1161 07	1, 2,		327,31	eni-ensi	n.cs.	Selection (CO)	1.
٠.	-	10 to	carried Uten 210 April		11-111-110		_		10 May - 100		Talles (albertage)	į.

er Negration	2013 <u>- 173 (173 (17</u> 3		174885	<u> </u>	INCET DIM.	1176	ו זינור	L.C.	A SE	FF.	74	, unit	r tereties 0/2 de	(d	£1951	85		erric
1.102/	/vO/vč:Eair.i	1-60-10	V107/50	P-0814	12 48				1	aret el			an sea on Pile	ire .	1	25 (100	
	ONS-HEREX	F1-GD-10			diriow.	1	en	(a)	æ_ <u>≠</u> ≅]			1	er er Canteriola	: [- <u>`</u>	880951			
	ONS-BEREZ ONS-BEREZ	, -up-tu	RS6	P-2007		1		N STON	masa≘ i		-	1-	yety.		V£0951.	95		. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
1102	/50/RZ:04190	v1-60:10	~V1D2/5	OLE: BAND	litabneM	1,	5711			TERSTE	2.701/	r	en Olzmana uz.					1.5.
8/	OVE BEISER				WW KPCF	+	6 901	io T de	N=0 \$115	5125/E		7.00	grade dipprietZ P		50096 ²	55	.	
2107	LUNG BEGER	.v[-90:10.	RS	Ph-TORA	7 - 7 Ta					<u> </u>	37		dana ara tana		16°1961	115		1
1.3		e1:60-T0	v107/	OTEP ED	Elvan e Nai	h	in volt.		manny.	025185	5: 10 1	ii o	le nark aluk mar		9-14-3 11-3			10.0
	/QU/-RIEF			EP-1044	ISUN IN W		gar.	1 3	ION TO		s or COL	711.7	Personal Services	EIW.	nbuiasi .	6.5		
(10)	Synd/bs: balate	ur en 11	H5	K1-100P		μ) () , () ()	-	ť	F14- 540		_	100	MIN O/S HELD	10.05	45E 95E	45		
91 - A	12/vo/6 main()	ul-50-10	9102/	50/1 Exp 1010	Part and A	, 1	26.61		147.54D	42501	21		<u> </u>		ļ <u>.</u>			
210	MEGINE RIPER			- CORD	pur ve v	-	at ett		distant.	61210		,,,	NoA (3\) matés au mailtr	Dia	9501951	ts		
· 177	01/00/H(:n=14()	-1-60-1a	9:02:	200-102a \20\45:50145		·	· · ·		INN 585 :	1 11111			abes .		96(0951	01]	
. []		21-UD-10,	PLOF	Date(0.31/05/	larla M.	4	15 151		1204 M 29∂ 1204	:48091	E O E C	1141	MEW DIZ DEFINA	PECINA	7000		4	
_ '\	ACONS HERE'S		1 .	1540-1687			99 211	. -	1.04	+-	4.0	-	BIH IO	1β±64	1061951	61	1	
1	INTERNATION IN	y[*60-LC	V103	/50/16:9=140 856v-2084	(nestable)			put	464 s44 s49	-9589	609-10		ujjež		است. والمامات	,	7	
-	NAMES AREAS	₽E-60-10		2/50/16:0=180 .	hero		52,61		em dia 248 oneoen	-5786	1.116	0141	4045 O/5 418/1 16	144vM	Ezelazı	ļ	4	
. 70	OX/MOTORIES	01.01.10		R564-408V	อะนาจถ		1		Ch2 year x	 	-		Vehicumid New 5/O Bost	9848	et terrer	· Ir		
) (TG#/VO/92:001961	₽1-60-10		2/90/1E:P#1#G	maide8 herk		12.64	"		-6641	122	n14*4	uada uatti			94	\dagger	
	RECOVERED TO		1	Z/SO/TS:paleG	(1040		10.11	t pno	ol Ibas Sa	-602	t 1597	0TZ1	Hes OVS DRUN 70	o imp	0530951		<u>!</u>	1
	AUCYNOMIC DAIRES	₩1-60-T0	· *"	8264-7080	шелі-8				be Chembe		6		(euin	-burnz	120137	50	1	:
ļ	LIOI/VI-/UL PRIED	91-60-10	b16	CP140/16:b3140	MaM n	Kyı	15.41	ET 247		200:	DIED	IDLZS	TRUTH CIVE HA)			-+-	-4 }	
- 1	BAUNX HIER.	<u> </u>		05/50/16:p=1e0	10101	÷γ	95'5	OT 2	Injuids Set	-ROZ	100	totr:	O\2 nada seg nada Hallob		54:1951	- "	' ' 5년 -	
1	HARVING HARRY	\$ (-KG-10	"	R2En-108n	<u>.</u>		<u> </u>	<u>. .</u>	·[02016X 5d		: · ·		Pilah babmm	uluM.	BZ 11.251		,]	
- }	Stanforda (Bashir)	p1 40·10	71	D1/50/15:PaleO	18201	ış	38.0	וצנו י	-[4644-4 90	-971	TTEC	10111	0\z pilen		,:		-	
1	HEATER-MERSY	\		IOT/20\LEIbetaD	1 (870)	1 ×	ts"	iii K	ry (0.1%4) So	201	2 12584	101.	(e) as cars in o f	LT 144-B	7411557	. : : !	<u>'</u>	
-	RIGHT THE PLING	61.60.fg	` "	#289-708#							<u> </u>		flatte sabreas	2 barz	157,95	, ,		
4.4	/ tori will stips is D	#1-60-F	, † ,	TOL/SO/TE:Paved	10:30	NEX.	EÞ	96 4	isa ndar Gar	-#5	3eos	rtatei						
1	TONT BERES		Ι,	- #222-TOBA	<u> </u>	- 14 k	56	66				9-TOT/1	MoM O\2 nat (lijā substa šda	corps:	ı '	0Þ 1	
! -	O*!=q*\$8\04\50)	o Table 0	•	101/50/15:P#190 4801-1089				-1	TIMO Jabač	_ _			UqVY		2500-01	, -	41	
· [RATING HEAVY) T-60-L	. ,	rtn2/50/15(P#140	-	UTY	-	STI	ROBLING S	٠,	86794	5 TOT 6					.	
· [85.205-1602-162-25-25	.		956V-(D90		luis y		1197	eneviah S	- T			I nat O\2 banes benne	Srivin ber duna	e764e- 21	sī į	aE	:-
·	* (QX / VQ (R.) (- 4) PT	₩1-60-1	ıo i	9560-LOSE			. '		. <u> </u>		1008	2-tot/					(1	
1.	B(C)1-95657	1 540	 .	♥(01/50/\$1)P*!*		tu ny	-	11e.5	าสระบบสีเริง การเป	509	TÜREY	6-10T	1 IO 100H D/S	IMA lugge	14009		_!	
[MANAGE BEGGE	h1-60-		6561-2089				2 97 7				•	हा ज/इ तथा भा	IIU 100M	6560	95T 1	45	
	-£101/vc/82:pan		to	8274-7084 8274-7084	s "."	Keu t :			. Astronanch	2 649	45578	10-101	High start o	_	K		(i)	
	ATONT-BE-ITE			#102/50/1E:Pate	0	HILL C	1	g Lat	Man net m	ide .	-Cristian	E Portini	1		ENDT	.,,		
أيسز	7107/V0/8/10 ^{a16}	0 1,·£3		BCK-COAP	11.	. 7		****	파네 전 IP의 당	<u></u>		-بنيا	134 (09 0/5	usiga PIH	9100	726	{	
	7205/40/85:0414	IG 91-60	TO	#10E/50/16:pes	174	N als	" ""	** = (.			·!	101.20		49				
Ï	NY DOL BERET	``'		+101/50/11:p=1	•c	2 1181	-	££'511	(may)	49	·2522) E 0 - T 0		SAAN DERI	TOS!	961	EE	
•	TEOSTACIAS DATE	G 61-66)-TD	HERA-TORA					- T-024/WO		╀	 - -	_ _	THE NUMBER	IN 199	941,	ζί.	ļ :
	\$105\80\85.ber		0.10	9102/50/15:P3)	10 "	Z 11951	H	11-121	1.02440		-1045	etc-10						
	MYUAT ACELS	:		#16V-C09*		7 400	E®H	£8.55.	iss auter	C62 H	.6061	1	ATT IIA O\Z janz	i bernmer ruisi	ILM PAU	g951 	IS.	
•	. A COLUMN 137:39		o : 0 · .	#524-1054 #524-1054	••• · · · ·		إ		<u></u>		ļ. 	5	1971 Renta		M.B.	 10951	5).
	94,302.8665	- 1	10-10	#101/50/1E:00	- 1	2 041	164	#B'921	[84PU)	199	195	261-11	1111					{
	. £1G2/00/92:Pª			8565-1359		puesto	1154	62.45.	י פיא נווון	1V) 5d9	1	ace-c		1643 5 922)9M	.w. 1 25	38973	67	
	(ID(/r0/92/p)	100 00-	NO-10	#107/50/161P1					\\	<u> </u>		l ·			_	81951	92	
	RAGUZ-GERS	· L_	- T	9102/50/TE:P		102	m:	9 (11		ahi 242	5 · co	tZED:	01/1				+	
	\$1027/0782-P		60-10	8269-108				57.41			ᆔᅳ	ı,		illuðsmás Þásmari	IR. 26	Teen)	it.	
	(162/60/92:2	aleti at	-60-10	9569-40R	Date:	i.Z	u.	1 " "			-96	PEEC		wight!			- FE	-
•	#(057.4E6	.67		9102/50/IF:		10 11 12	припце	5 1.50		reg Sap	-86	(58t)		5 D I H 10 5	mients E	501951		_]
	25006-255		-60-15	#SAD-LOF		i		⊥_				<u> </u>					,	
												:						

John Sital (71)

OVOISTAKT EDUCATION OFFICER

tay/ 201/10:01 6 ביוויקופן במטכבותהן

6.50EO (M) Tongi

επεσελική ζική όσος 😚

7. Other Marin Gray radda 7. Other Cognitis round Character (1. Usaries Montiving Officer IMU Character

י בוניבלות 3573 בישור מוסיבות

Under the Carl Darie de material des de la constitución de la constitu

(MALE) CHARSAODA DISTRICT EDUCATION OFFICER (SIRAN MUHAMMADIS)

expose in the case of two or make employees is the samployees. The including the senior to the parameter on 19 7 - 24-20-19 uner-24 of the employees, which destrices destructed and: this her min the sume severe or entire, though the continuous severe or entire to the continuous of their contin

ment of this Act, are to be uppointed to the respect to strong or coding, title specific of two Polythin of the strength of the Elementary old Secondary Education (Appointment and Regulational Services), I'm secumentary of the secumentary of he costs may be, who are in strains on regular basis on the commencement and the father. ins outch power net.

3.) The employees whose services are regularized under The Khyber Poshtunkhwa Employees of the Elementary and Secondary and Secondary (Rhyber Poshtunkhwa kei No.1 of 2018) or in the process of nitaining services in the consententing of the Regularized of Secondary Education (Appointment and Regularized of Services) Act. 2017 (Khyber Poshtunkhwa Act No.1 of 2018) shall rank prince to all civil services (Appointment and Regularized of Services) Act. 2017 (Khyber Poshtunkhwa Act No.1 of 2018) shall rank prince to all civil services (Appointment and Regularized of Services) Act. 2017 (Khyber Poshtunkhwa Act No.1 of 2018) shall rank prince to all civil services of the Conference of the Co

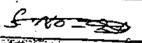
pi izajduz baunalar ad iloniz, yoq alarif verification of academic documental extranonial from the conceered Boanes thinwestry by egulassand gronic district and old scord of ton oth brus savas must brime

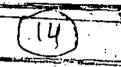
Their regularization shall not affect the promotion quoto of estating holders of posts in respective service cudies. The regularization will mat be in foods up of the segmentary of the regularization will mat be in foods who are under disciplinate areaserations. ton and experience required for a regular past

and a population sees shall be forfelled to the Covi.

1.) Their services shall be governed by the Enyber Poblimabino Civil servogus Act, 1573, the Khiber Poblimabina.
(Appulniment, Deputation, Positing & Figure of Secriters, Lecturers, Institutions of Decrees their services shall be to the Considered from time so there by the Operanters.
(Appulniment, Deputation, Positing & Figure of they shall be vilgible for pension are discipling the services shall be considered freging and they shall be vilgible for pension are discipling to terminal in serms of the Khipber 2.) Their services shall be considered from the Xhipber 2.) Their services are liable to terminating on one months' notice from either side in case of resignation without notice, their one months' proposition of the Constitution of

		\$					2WOITI GIAO	<u></u>	
(140-1)	1102/10/51-0-4+0 . 00-11392	I specifically 2	(4.15)	paly entwines	-entret		NAMES OVE NAS SERVET	1140001102	"
. (1-60-10	AT-PTALL	f upour s	65 MOI	100 100 and 640 .	-433AEC		O'll datt lagiffer bord datt till detel bert	1001101	24.
\$1-60-10 v	CIDEMONITUMNO,	117940	AFTER	111 ⁽¹⁾ 20 543	134343		sides Mills officials all bad number hill O'g (escal)	SETEMBEROS	111
21-63-10	1405/65/15/90143	PHO- (MISS)	106.79	EN ITA NO	-32004E		O's deBu sende	es root tox	04.7
1 11000	ME ALERTS	- minimi	50 251	Metring	. Li		Bernal DVZ (nateud) whitestill ringk?	9110001102	10
4:-10-11	ffatherogramen ff-fabtt		et gt t	(Just f. en en D	4111	4-201¢1	had trever Old Hosti Artis	f+10001425	127
it state	fretheri samen	Abrasi p.	11:	300 20 10 M1	- - 	\: • FALL1	NAME OVER DEVIA NAME.	19112201101	217
1 10-00	titt, to, itaueo	8 82 HZ PP40	4111	Contractor of		er Lages	Dig direct beneatons	18+1/4707	4; >
11-90-00	\$25-\$4105	300.440	\$6 PE		-	en f	E*	1011206101	"
£(++++++++++++++++++++++++++++++++++++	\$105/20/25:20100 BED-59125	danut l	#.ttt	2 all danist? (4)		P.E.	RES CIVE NA DEFENDENCIA	Etatoortor	""
££100-45	Selection States	#smit1	9'216	S.att dama? ¿M	,} ,	61 18-20) (1)TD:468	610) 2005 E G.E	125
4190-4	George de la constante	Tujers	-	Ignof larring 24		41	VANTA BA ONE MARIE POTAL	1011001101	(1)
, , , , , , , , , , , , , , , , , , , ,	.958-1940t			<u> </u>	777	- 2011	<u>'l</u>	ب ب	<u>!</u>







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

2 091-9220481 Smischarsadda@yahao.com

SVE

OFFICE ORDER

Consequent upon recommendation of the Departmental Promotion Committee and in pursuance of the Government of Chyber 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 pereby primary below the post of SPST (BPS-14) (Re-15130-1170-50780) plus usual allowances as administible 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.

Carlo Area			,		E.
St. : NA		PRESENT SCHOOL	POSTED AT		
	R MUHAMMAD KHAN	GPS GANDERI BALA		REMAR	λĸ
. 2. MINH	IN DILAH	GPS AMBA DHERI NO.2	ONABOR YALAY DOBAND.	A.V.P (_
3 ASPA	ALI JOHAN	GPS CHEENA	GPS AMBA CHERL NO.2	A.V.P	
4 ZUB	UR.		GPS CHEENA	AVP :	-
G . ADNA	vi i	-GPS PLA DHERAL	GPS PLA DHERAI	AVP	
0. FAZA	LMANAN	OPS KNULY	GPS KHIVLY	AV.P	-
	QAYUM	GPS KHAT KILLI SHOLGARA	. GPS KHAT KILLI SHOLGARA	ΑVP	_
	KAR ULLAH	GPS MALIK ABAD	GPS MALIK ABAD	AVP	
 	M SHAH	GPS MARCHAKI	· GPS MARCHAKI	AV.P	
		GPS INAM KILLI	GPS LANDAI SHAH		
~	NIMAD YOUSAF	GPS KULA DHER NO.1	GPS KULA DHER NO.1	AVP	
14 ASLA		GPS-KHORA ABAD	GPS KNORA ABAD	A.V.P	
2× AMITA		GPS ANGAR KOROONA	GPS ANGAR KOROONA	I AVP	_
3 NIZAM	ULLAH.:	GPS ISLAM ABAD DARGAI	T	AVP ;	
NAEEN	JAN.	GPS KASS KORDONA	CPS ISLAM ABAD DARGAI	AVP !	_
NASIR	KHAN	GPS KHISRO KHAN KILLI	GPS KASS KOROONA	A.V.P	_
TILAVV	AT SHAH	GPS MANDEZAI	GPS SHAHWAWAZ KILLI	A.V.P	_
MUHAN	MAD KHALID		GPS MANDEZAI	AVP	-
WAJID		GPS STATION KORODNA	GPS GHULAM FARIO KILLI	AV,P	-
MUHAN	MAD ISHTIAQ	GPS PALOSA JADEED	GPS PALOSA JADEED	AVP	-
	MUSAWIR	GPS MERA SHAIGH NO.8	GPS BEHLOLA		
SHER A		GPS ANGAR KOROONA	GPS ANGAR KOROONA	 	
SABIR S		-CPS KANGRA	GPS KANGRA	1 AV.P	_
 		GPS ZUHRAB GUL KILLI NO.1	GPS ZUHRAB GUL KILLI NO.1	AV.P	_
	GHAYAS KHAN	GPS PARAO NISATTA	GPS PARAO NISATTA	A.V.P	
112 12	MAD SHOAIB	GPS ASHARA BATTAGRAM		A.V.P	
SIVUID	KHANSS	GPS MIAN SAHIB OUL KILLI	GPS ASHAKA HATTAGITAN	.cv.r	-
JAWAD A	ш.	GPS KHUGAL	GPS MIAN SAVIIB GUL KILLI	AVP	٦
ZULFKA	K ALI	GPS CHAMYARAN	GPS HHUDAI	NVP	4
! KNICAM E	LAHI.	GPS AJOON KILLI	GPS CHAMYARAN	AVP "	┨
LUDASSI	R SHAH		GPS AJOCH KHU,	1.0,5	4
YASIR KH	·	GPS RIZWAN ABAD	GPS REVIAULASAD		-
ZUBAIR KI		GPS INAM KILLI	GPS MAN HULLI	IAVP	-
1 200000 10	TAN .	GPS SHAHBAZ KHAN	GPS SHAHDAZ KHAN	AVP	

ALTERNATION ...

the state of the s

Ġ

Ċ.

------ h



give an undertaking to this effect to be recorded in their service books. tion for any change regarding Posting/Transfer shall be entertained.

Adjustment/transfer of the following teachers is also hereby ordered on their own pay & scale in the schools mentioned ch in the interest of public service with imm

	The Car passer Scive & With	inimicanie exect.	•	•	-	آ ڪئي	1 6 L 1
100	SNAME & DESIGNATION	PRESENT SCHOOL		POSTED AT		REMARKS	<u></u>
1/34	Rinz Ali SPST	GPS Kass Karoona		GPS Tale Shah		Single tracher s	1.25
2	Kinurahad Alam SPST	CPS Gai State KID		GPS Bari Bend	- / / /		1
3 < 41.	111111111111111111111111111111111111111	CFSKigan	<u>.</u>	GPS Salo Bart Band	16.2	Adjusted being	F 7 .
£ 50.3	Abdul Bart Jan SPST	GPS Chulam Farid Killi		CPS No.1 Seder Cerhal		Adjusted being	
15 april	Muhamma Soll ad SPST	GPS Chundal Koroona	,	GPS Banda Rashakal			र वर
6 - H	Muslim Khan SPSK	GPS Mirra Dher No.1		GPS Hassanzai		Adjusted being	/plus
		GPS Raff Ullah Koroona	-: _	GPS Bachyeno XIII		N.Basis	
	THE VICE OF	GPS Landt Shah		CPS Arat Korpona			6"-
29.4K	Zahlr Ullah SPST	GPS Stebare No.1		GPS Sukkar	<u>ب</u> بـــا	Being disable i	BHE 4 €
¹⁰⁰	Muhammid Zahoor PST	GPS Shah Nawas Killi	÷	CPS Pehlota Bala	- 1	N.Bosis [Sr Fig.
HI B	Asiz ur Rahim SPST	· GPS Azim Gul Mian Killi	<u> </u>	GPS Sattl Abod			12.
	THubaili Akhtar SPST	GPS Khan Khel	<u>. </u>	CPS Conda			Ωŧ
-13	Shah Jehan PaT	GPS Nimonal Baba		GPS Sheikh Kili		N.Basts	3 22 2
234 377 00	Abdur Rahman SF51	GIS Risaldar KIIII No.2	<u>.</u>	CPS Carhi Harreed Gui			k # .
	·		7	I am a coming transfer from		RI Reals . 3	

X.

No TA, DA is allowed

*Charge report should be submitted to all concerned

(JEHANGIR KHAN) DISTRICT EDUCATION OFFICER

F.No. (Promotion 2020) / Dated

Director (E&SE) Khyber Pakhbinkhwa Peshawar. "Deputy Commissioner Charmida.

2. Deputy Commissioner Characida.
3. District Accounts Officer Characida.
4. District Monitoring Officer (IMU) Characida.
4. District Monitoring Officer (IMU) Characida.
5. Sub-Divisional Education Officer (Male) Characida.
6. Sub-Divisional Education Officer (Male) Tanga.
7. Sub-Divisional Education Officer (Male) Shabqadar.
8. Official Concerned.
9. Office file:

(MALE) CHARSADDA

Τ,



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.

Hespected/Sir.

Most respectfully, it is stated that I am working under your kind control in District Charsadda II was appointed as, PST (BPS-12) vide order Endst No. 4807-4958 dated 31-05-2014. After performing duty for sufficient firms 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

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

Designation SPST

GPS Kangra

Contact No: 03/95523272

Signature.

Date

20 /04 / 2024



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

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 FO THE MONTH \$ OF JUNE

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

r#	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 GPS Shahbaz Khari Kor GPS, Mian killi Shabqadar		
8	Zubair Khan	SPST			
9	Mustafa Zeb	SPST			
10	Gul Raj Khan	SPST	GPS, Kodai No .1		
11	Sadeeq Ullah	SPST	GPS, Kodai No,2 GPS, Banda Rashakai GPS, Rashaki GPS, No1,Kodai		
12	Muhammad Sajjad	SPST			
13	Khan Muhammad.	SPST			
14	Zakir Ullah	SPST			
15	Shah Muhammad	SPST	GPS Shabaz Khan Killi		





§

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

16	lhsan Ali	000-		
17		SPST	GPS, GPS, Hassanzai	
	Muhammad Izhar	SPST		
18	Asif ullah		Oi o, massanza	
19		SP3T	GPS, Sandasar	
	Fathul Amin	SPST	GPS, Haryana GPS, No1, Sohta GPS Haji AbadSreekh	
20	Tilawat Shah			
21	<u> </u>	SPST		
22	Muhammad Asim	SPST		
44	Shah Khalid	SPST	<u> </u>	
23	Cural 75	0,01	GPS, Haji AbadSreekh	
24	Syed Masood Ahmad	SPST	GPS,NO2 Atttaki	
	Mohibullah	SPST		
25	Bakht Taj Gui		GPS.NO 2. Attaki	
26		SPST	GPS Kabaley Shabqadar	
	Syed Ziauddin Badshah	SPST		
27	Seeed Khan		GPS Daryab Korona	
28		SPST	GPS Matta Mughal Khel	
29	Wasal Ahmad SPST	SPST		
29	Sher Ali	SPST	Hassan Gul Korona	
30	Muhammad Shoaib		GPS Kangra Nahaqqi	
1		. SPST	GPS Ashara Battagram	
_	Arshad Khan	SPST		
2	Adnan Hussain		GPS, Kotak	
		SPST	GPS, Gonda	

Encl: As Above

Sub Divisional Education Officer
(Male) Shabquyar



APPEAL NO.

ABDUL MUSAWIR

EDUCATION DEPTT:

IS: NO	THE RECEIPTION OF THE PROPERTY					
1.	Memo of appeal		YEXUR	1 - 5		
2.	Appointment Order dated 31.05.2014		A	6 - 7		
3.	Charge Report dated 31.05.2014		B _.	8		
4.	Attendance Register		€	9		
5.	Service Book		D	10 - 17		
6.	Pay Rolls		 E	18 - 19		
7.	Départmental Appeal dated 09.07.2021	ſ		20		
8.	Appellate Order Dated 16.09.2021	C		21		
9.	Wakalatnama			22		

APPELLANT

MUHAMMAD MAAZ MADNI,

ADVOCATE HIGH COURT, PESHAWAR

KHATTAK LAW ASSOCIATES,
Juma Khan Plaza, Warsak Rand, Peshawar
0333-9313113, 0345-9090737

muhammad.m3adv@gmail.com

(20)

Page 11

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

APPEAL NO. 7397 /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

- 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 Sheweth;

FACTS

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

The state of the s

Page | 2

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. LiThat 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.

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

- 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.
- 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

ATT STREET

Page | 3

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

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

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

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

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 Ols 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

Paige | 4

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

APPERLANT

ABOUL MUSAVEID

Through:

MUHAMMAD MAAZ MADNI Advocate High Court, Peshawar

1 Por

*--



Page | 5

CERTIFICATE



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

DERONENT 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

WS 47 THE

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Anneal No. 7597/202

BEFORE: MRS, RASHIDA BANO MR. MUHAMMAD AKBAR KHAN ...

MEMBER(J) MEMBER (E)

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

(Appellant)

VERSUS

1. The Director Elemen & 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

cate of his appointment. He

汽车

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,

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.

hence the instant service appeal.

- 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.



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

Member (E)

(RASHIDA BANO) Member (J)

ORDER 06.11.2023



- 1. Learned counsel for the appellant present. Mr. Muhammad
 Jan learned District Attorney for the respondents present.
- 2. Vide our detailed judgement of today placed on file, the appeal in hand is allowed as prayed for and the appellant is held entitled to all back benefits. Costs shall follow the event. Consign.
- 3. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 6th day of November, 2023.

(Muhammad Akbar Khan) Member (E)

(Rashida Bano) Member (I)

Krimmal

vfi.

vijj.

The Director Education

Elementary and Secondary Education KP Peshawar.

Departmental Appeal

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.

11. Appellants after scrutiny and through proper channels 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)

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)

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

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-35. (Copy of Regularization Order attached)

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)

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)

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)

the service appeal decision in the same nature issue and matter had came 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

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.

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 adjust 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

Sher Ali S/O Hafiz Ullah (SPST, BPS-14) Government Primary School Kangra , Shabqadar District Charsadda

