


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1909 / 2024


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

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

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

No. 774 /Inst./2024/KPST,

Dt. 12/9/2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Ismail Khan Adv.
High Court Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Service Appeal No. 1909 / 2024

Tariq Jan VERSUS The District Education Officer (Male) District Charsadda

INDEX SHEET

| S.No | Descriptions | Annexture | P.No |
|------|---|-----------|-------|
| 1 | Memo of Appeal | | 1-5 |
| 2 | Affidavit | | 6 |
| 3 | Notices to Parties | | |
| 4 | Copies of appointments orders of Appellants dated 31-05-2014 | A | 7-8 |
| 5 | Copies of appellants Charges Reports dated 31-05-2014 | B | 9 |
| 6 | Copies of Service Books of appellants | C | 10-11 |
| 7 | Copies of Regularization Order of appellants | D | 12-14 |
| 8 | Copies of Promotion Order of appellants | E | 15-17 |
| 9 | Copies of applications/request to SDEO/DEO | F | 18 |
| 10 | Copy of SDEO Letter to DEO | G | 19-20 |
| 11 | Copy of same identical nature case service appeal No-7597/2021 decided on dated 06-11-2023 by Kp Service Tribunal | H | 21-30 |
| 12 | Copies of Departmental Appeal | I | 31 |
| 13 | Wakalat Nama | | 32 |

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 1909 /2024

①

Tariq Jan S/O Badi Uz Zaman (SPST, BPS-14) Government Primary School Attaki No-3
Shabqadar District Charsadda

.....Appellant...

Versus

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

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT ALLOWING/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 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 the entitles the appellant for the annual increment of the year 2014.
- D. That the act of the Respondents by illegally deducting annual increment for the year 2014, and not releasing the monthly salary for the month of June, July and August 2014, is against the prevailing Law and Rules.
- E. That the Respondents violated Article 38(E) of the constitution of the Islamic Republic of Pakistan 1973, according to which "*The state is bound to eliminate disparity in the income and earning of individuals including persons in the various service of Pakistan*". Thus in light of above the Respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July and August 2014.

F. That the Respondents acted in arbitrary and malafide manner, while illegally deducting the annual increment for the year 2014, and not releasing salaries for the month of June July and August 2014.

G. That the Act and omission of the Respondents by illegally deducting annual increment for the year 2014, and not releasing of the monthly salaries for the month of June, July and August 2014, is nothing but depriving the appellant from the legal rights of livelihood.

H. That the appellant seeks permission to advance other grounds and proofs evidence at the time of hearing and arguments.

I. That other ground will be discussed at the time of arguments with prior permission of this Hon'ble Court.

IT IS THEREFORE HUMBL Y P R A Y E D T H A T , O N A C C E P T A N C E O F T H E I N S T A N T S E R V I C E A P P E A L , T H E I N A C T I O N O F T H E R E S P O N D E N T S B Y N O T A L L O W I N G T H E A N N U A L I N C R E M E N T F O R T H E Y E A R 2 0 1 4 A N D N O T R E L E A S I N G T H E O U T S T A N D I N G S A L A R I E S F O R T H E M O N T H O F J U N E , J U L Y A N D A U G U S T 2 0 1 4 , A N D N O T D E C I D E D T H E D E P A R T M E N T A L A P P E A L W I T H I N S T I P U L A T E D P E R I O D , T H E R E S P O N D E N T S M A Y V E R Y K I N D L Y B E D I R E C T E D T O A L L O W T H E I N C R E M E N T F O R T H E Y E A R 2 0 1 4 W I T H A L L B A C K B E N I F I T S A N D A L S O R E L E A S E T H E O U T S T A N D I N G S A L A R I E S F O R T H E M O N T H O F J U N E , J U L Y A N D A U G U S T 2 0 1 4 . O R A N Y O T H E R R E M E D Y / R E L I E F W H I C H T H I S H O N ' B L E C O U R T / T R I B U N A L D E E M S F I T A N D A P P R O P R I A T E M A Y K I N D L Y A L S O B E A W A R D E D / P A S S E D I N F A V O U R O F A P P E L L A N T S , A S T H E S A M E I S S U E A N D Q U E S T I O N I N I D E N T I C A L N A T U R E C A S E I N S E R V I C E A P P E A L N O - 7 5 9 7 O F 2 0 2 1 A L S O B E E N A L L O W E D A N D D E C I D E D O N D A T E D 0 6 - 1 1 - 2 0 2 3 B Y T H I S H O N ' B L E C O U R T , A n d a n y o t h e r r e l i e f a n d r e m e d y d e e m s j u s t i f i e d b y t h i s H o n ' b l e T r i b u n a l m a y a l s o b e p a s s e d i n f a v o u r o f t h e a p p e l l a n t f o r t h e i n t e r e s t o f j u s t i c e .

APPELLANT *Tariq Jan*
Tariq Jan

Through Counsel

Imad
Muhammad - Ismail
Advocate

5

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____/2024

Tariq Jan S/O Badi Uz Zaman (SPST, BPS-14) Government Primary School Attaki No-3
Shabqadar District Charsadda

VERSUS

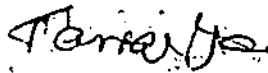
The Director, Education Khyber Pakhtun Khuwa Peshawar and others

Certificate.

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

Appellants

APPELLANT



Tariq Jan

Through Counsel

Muhammad - Tameel



Advocate



6

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR**

Service Appeal No. _____ / 2024

Tariq Jan S/O Badi Uz Zaman (SPST, BPS-14) Government Primary School Attaki No-3
Shabqadar District Charsadda

.....Appellant

VERSUS

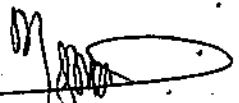
1. The District Education Officer (Male) District Charsadda.
2. The Secretary Elementary and Secondary Education, KP Peshawar
3. The Director Education Directorate of Elementary and Secondary Education Peshawar
4. The SDEO Male Shabqadar District Charsadda.

.....Respondents

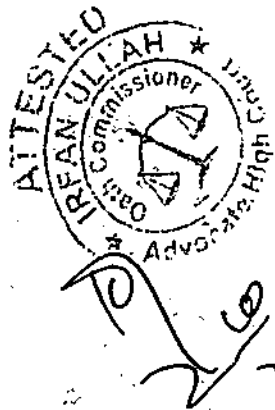
AFFIDAVIT

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


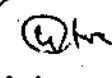

Deponent 



IDENTIFIED BY:
Muhammad Ismail
Advocate High Court



Through counsel

Ismail Khan 
Umar Khan 
Amjid Khan Mohmand 
Advocates High court Peshawar

**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA**

APPOINTMENT

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

| S.# | Name | School Name | U/C | Score |
|--------|------------------------------|-------------|------------------|-------|
| 355-44 | YARIQ JAN 17101-16020-8-9 | GPS Atahing | MC- Shahqader | 99.04 |

TERMS & CONDITIONS:

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

Appointment Order PST (M) Ad hoc -Based

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

(Siraj Muhammad)
 District Education Officer
 (Male) Charsadda

Endst: No: 4807-1958/Dated: Charsadda the: 31/5/14

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

(Signature)
 District Education Officer
 (Male) Charsadda

CHARGE REPORT

It is certified that Mr. Taris-Jan

s/o Badruz Zoman appointed as
PST BPS-12 in GTS No. 03 Ataki

PC-III Shabgauri vide DEC (M)

Charsadda Endst. No 4807-4958

The charge has

been handed over/taken over on
31-05-2014 After Noon

Charge handed over
by

Head Teacher

GTS No. 03

Ataki

M. P. ...

Head Master
G.S. No. 03
31/05/2014

Charge taken
over by

M. ...

31/05/2014

(9)

(9)

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

Name: TARIQ-JAN

Race: AFGHANI

Residence: Village: Gullkaran Kovona P/O Shabqadar
Teh: Shabqadar District Charsadda



Father's name and residence: Badriz-Zaman



Date of birth by Christian era as nearly as can be ascertained: (04-02-1986)


Exact height by measurement: 5' 4"

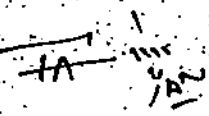
Personal marks for identification: Nil


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)

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| Signature of Government Servant | Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8 | Date of termination or appointment. | Reason of termination (such as Promotion, transfer, dismissal, etc) | Signature of the head of the office or other attesting officer. | Leave | | Signature of the head of the office or other attesting officer | Reference to any recorded punishment or censure, or reward or praise of the Government Servant |
| | | | | | Nature and duration of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government | | |
| | | | | | Period | Government to which debitible | | |
| | Sub Divisional Education Officer (Male) Shabqadar | 30/11/2017 | Appointment | Sub Divisional Education Officer (Male) Shabqadar | | | | Service verified w.e.f 1/7/2012 to 28-2-2018 from the A.C.C. roll and other record of this office |
| | Sub Divisional Education Officer (Male) Shabqadar | 30/11/2018 | Retire | (Signature) | | | | Sub Divisional Education Officer (Male) Shabqadar |
| | | | TR No. 5/18 | | | | | |
| | | | 23689, 25716 | | | | | |
| | | | Regularized NTS | | | | | |
| | | | Service w.e.f 1/7/2012 | | | | | |
| | | | 29/2/18 | | | | | |
| | | | | | | | | |
| | Sub Divisional Education Officer (Male) Shabqadar | Service verified to 30/11/2018 | | 01/3/2018 | | | | Sub Divisional Education Officer (Male) Shabqadar |
| | | roll and other record of this office | | | | | | |
| | | | | | | | | |

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

OFFICE OF THE DISTRICT EDUCATION OFFICER (M.A.E.) - HANNOUDA

NOTIFICATION

In pursuance of The Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education Department and Regulation 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/3/2/2018/SIT) dated 16/02/2018, services of the following (333) Primary School Teachers appointed on the basis of contract with effect from 15-07-2017, are hereby regularized in GPs-12, on the basis of the following code 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. No. | Name of Teacher | Contract No. | Contract Date | Qualification | Grade | Remarks |
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| Sl. No. | Name of the Candidate | Registration No. | Category | Age | Grade | Date of Birth | Remarks |
|---------|-----------------------|------------------|---------------|-------|---------|---------------|----------|
| 101 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 102 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 103 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 104 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 105 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 106 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 107 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 108 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 109 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 110 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 111 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 112 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |
| 113 | Muhammad Ali Khan | 17102-3134441 | CPD (General) | 31.84 | Teacher | 20/02/1954 | 21.04.17 |

TERMS & CONDITIONS

The selection shall be governed by the Khyber Pakhtunkhwa Civil Service Act 1973 the Khyber Pakhtunkhwa Pension, Paying & Transfer of Teachers, Lecturers, Instructors & Deans) Regulatory Act 2011 and the Regulation of Services Act 2013 (Khyber Pakhtunkhwa Act No 1 of 2013) shall apply to the employees of the Government of Khyber Pakhtunkhwa. The selection shall be considered regular and the successful candidates shall be appointed on a regular basis on the commencement of the Government of Khyber Pakhtunkhwa. The selection shall be subject to the following conditions:

- The candidates must be of the age specified in the advertisement.
- The candidates must possess the minimum qualifications and experience as specified in the advertisement.
- The candidates must be citizens of Pakistan.
- The candidates must not be employed by any other government or private organization.
- The candidates must not be under any legal proceedings.
- The candidates must not be disqualified by law or by any court.
- The candidates must not be suffering from any physical or mental defect which may render them unfit for the service.
- The candidates must not be suffering from any contagious or infectious disease.
- The candidates must not be suffering from any other defect which may render them unfit for the service.

The Government reserves the right to cancel the selection process at any time without any assignment of blame.

GOVT. OF KHYBER PAKHTUNKHWA
DISTRICT EDUCATION OFFICE
HAGLEI CHARSAODI

17-20185

Muhammad Ali Khan
17-20185

(13)

| NO | DATE | DESCRIPTION | AMOUNT | CREDIT | DEBIT | BALANCE |
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| Year | Month | Day | Event | Location | Time | Remarks |
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| 1927 | Jan | 4 | ... | ... | ... | ... |
| 1927 | Jan | 5 | ... | ... | ... | ... |
| 1927 | Jan | 6 | ... | ... | ... | ... |
| 1927 | Jan | 7 | ... | ... | ... | ... |
| 1927 | Jan | 8 | ... | ... | ... | ... |
| 1927 | Jan | 9 | ... | ... | ... | ... |
| 1927 | Jan | 10 | ... | ... | ... | ... |
| 1927 | Jan | 11 | ... | ... | ... | ... |
| 1927 | Jan | 12 | ... | ... | ... | ... |
| 1927 | Jan | 13 | ... | ... | ... | ... |
| 1927 | Jan | 14 | ... | ... | ... | ... |
| 1927 | Jan | 15 | ... | ... | ... | ... |
| 1927 | Jan | 16 | ... | ... | ... | ... |
| 1927 | Jan | 17 | ... | ... | ... | ... |
| 1927 | Jan | 18 | ... | ... | ... | ... |
| 1927 | Jan | 19 | ... | ... | ... | ... |
| 1927 | Jan | 20 | ... | ... | ... | ... |
| 1927 | Jan | 21 | ... | ... | ... | ... |
| 1927 | Jan | 22 | ... | ... | ... | ... |
| 1927 | Jan | 23 | ... | ... | ... | ... |
| 1927 | Jan | 24 | ... | ... | ... | ... |
| 1927 | Jan | 25 | ... | ... | ... | ... |
| 1927 | Jan | 26 | ... | ... | ... | ... |
| 1927 | Jan | 27 | ... | ... | ... | ... |
| 1927 | Jan | 28 | ... | ... | ... | ... |
| 1927 | Jan | 29 | ... | ... | ... | ... |
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**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) E&SE CHARSADDA**

091-9220481 emischarsadda@yahoo.com

CWF

OFFICE ORDER

Consequent upon recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.2472-2542 / P/motion / Estab Dated Peshawar the 21/01/2013, the following Primary School Teachers (BPS-12) are hereby promoted to the post of SPST (BES-14) (Rs.15180-1170-50280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government in Teaching cadre on the terms and conditions given below with immediate effect and further posted in the school noted against each.

| S# | NAME | PRESENT SCHOOL | POSTED AT | REMARKS |
|----|--------------------|---------------------------|---------------------------|---------|
| 1 | SHER MUHAMMAD KHAN | GPS GANDERI DALA | GPS PALAY DOBANDI | A.V.P |
| 2 | MINHAJ ULLAH | GPS AMBA DHERI- NO.2 | GPS AMBA DHERI- NO.2 | A.V.P |
| 3 | ASIM ALI KHAN | GPS CHEENA | GPS CHEENA | A.V.P |
| 4 | ZUBAIR | GPS PLA DHERAI | GPS PLA DHERAI | A.V.P |
| 5 | ADNAN | GPS KHULY | GPS KHULY | A.V.P |
| 6 | FAZAL MANAN | GPS KHAT KILLI SHOLGARA | GPS KHAT KILLI SHOLGARA | A.V.P |
| 7 | ABID QAYUM | GPS MALIK ABAD | GPS MALIK ABAD | A.V.P |
| 8 | HETIKHAR ULLAH | GPS MARCHAKI | GPS MARCHAKI | A.V.P |
| 9 | MUSLIM SHAH | GPS INAM KILLI | GPS LANDAI SHAH | A.V.P |
| 10 | MUHAMMAD YOUSAF | GPS KULA DHER NO.1 | GPS KULA DHER NO.1 | A.V.P |
| 11 | ASLAM KHAN | GPS KHORA ABAD | GPS KHORA ABAD | A.V.P |
| 12 | AKHTAR ALI | GPS ANGAR KOROONA | GPS ANGAR KOROONA | A.V.P |
| 13 | NIZAM ULLAH | GPS ISLAM ABAD DARGAI | GPS ISLAM ABAD DARGAI | A.V.P |
| 14 | NAEEM JAN | GPS KASS KOROONA | GPS KASS KOROONA | A.V.P |
| 15 | NASIR KHAN | GPS KHISRO KHAN KILLI | GPS SHAHNAWAZ KILLI | A.V.P |
| 16 | TILAWAT SHAH | GPS MANDEZAI | GPS MANDEZAI | A.V.P |
| 17 | MUHAMMAD KHALID | GPS STATION KOROONA | GPS GHULAM FARID KILLI | A.V.P |
| 18 | WAJID ULLAH | GPS PALOSA JADEED | GPS PALOSA JADEED | A.V.P |
| 19 | MUHAMMAD ISHTIAQ | GPS MERA SHAKH- NO.3 | GPS DEHLOLA | A.V.P |
| 20 | ABDUL MUSAWIR | GPS ANGAR KOROONA | GPS ANGAR KOROONA | A.V.P |
| 21 | SHER ALI | GPS KANGRA | GPS KANGRA | A.V.P |
| 22 | SABIR SHAH | GPS ZUHRAB GUL KILLI NO.1 | GPS ZUHRAB GUL KILLI NO.1 | A.V.P |
| 23 | SHEHER GHAYAS KHAN | GPS PARAO NISATTA | GPS PARAO NISATTA | A.V.P |
| 24 | MUHAMMAD SHOAB | GPS ASHARA BATTAGRAM | GPS ASHARA BATTAGRAM | A.V.P |
| 25 | SHAHID KHAN | GPS MIAN SAHIB GUL KILLI | GPS MIAN SAHIB GUL KILLI | A.V.P |
| 26 | JAWAD ALI | GPS KHUBAI | GPS KHUBAI | A.V.P |
| 27 | ZULFIQAR ALI | GPS CHAMYARAN | GPS CHAMYARAN | A.V.P |
| 28 | KARAM ELAHI | GPS AJOON KILLI | GPS AJOON KILLI | A.V.P |
| 29 | MUDASSIR SHAH | GPS RIZWAN ABAD | GPS RIZWAN ABAD | A.V.P |
| 30 | YASIR KHAN | GPS INAM KILLI | GPS INAM KILLI | A.V.P |
| 31 | ZUBAIR KHAN | GPS CHANDAI KHAN | GPS CHANDAI KHAN | A.V.P |

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

TERMS & CONDITIONS:

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

- 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 Koroono | GPS Tala Shah | Single teacher school |
| 2 | Khurshad Alam SPST | GPS Gul Shah Killi | GPS Bari Band | Adjusted being 4/plus |
| 3 | Jawed Khan SPST | GPS Kagan | GPS Safo Bari Band | Adjusted being 4/plus |
| 4 | Abdul Bari Jan SPST | GPS Ghulam Farid Killi | GPS No.1 Sadar Curhal | N.Basis |
| 5 | Muhammad Sajjad SPST | GPS Ghundai Koroono | GPS Banda Rashakai | Adjusted being 4/plus |
| 6 | Muslim Khan SPST | GPS Mirza Dher No.1 | GPS Hassanzai | N.Basis |
| 7 | Bahur Rahman SPST | GPS Rafi Ullah Koroono | GPS Bachyano Killi | N.Basis |
| 8 | Misar Ali PST | GPS Landi Shah | GPS Arat Koroono | Being disable |
| 9 | Zahir Ullah SPST | GPS Shabara No.1 | GPS Sukkar | N.Basis |
| 10 | Muhammad Zahoor PST | GPS Shah Nawaz Killi | GPS Pehlola Bala | N.Basis |
| 11 | Aziz ur Rahman SPST | GPS Azim Gul Mian Killi | GPS Satti Abad | N.Basis |
| 12 | Husbaib Akhtar SPST | GPS Khan Khel | GPS Gonda | N.Basis |
| 13 | Shah Jehan PST | GPS Nilmorai Baba | GPS Sneeh Killi | N.Basis |
| 14 | Abdur Rahman SPST | GPS Risaldar Killi No.2 | GPS Garhi Hameed Gul | N.Basis |

NOTE:-

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

(JEHANGIR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

Endst: No. 5420-5602 / F.No. (Promotion 2020) / Dated 19/10/2020

- 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 (DMU) 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

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/Sr.

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 01/07/2014, 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 extend 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:

TARIQ-JAN

Designation: SPST

School: GPS

Caps. No 3 Attak shabzadar

Contact No:

0335-0017901

Signature:

Date:

20/04/2024

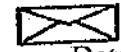
119



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

ATK H

No. 10021



sdeopri@gmail.com

Dated 22/9/2024

To

The District Education Officer
(Male) Charsadda

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

Memo:

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

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


20



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

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

Each As Above


Sub Divisional Education Officer
(Male) Shabqadar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 7597 /2021

(21)

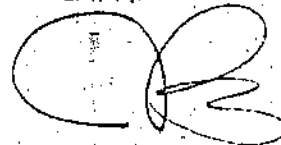
ABDUL MUSAWIR V/S EDUCATION DEPTT.

I N D E X

| S. NO. | DOCUMENTS | ANNEXURE | PAGE |
|--------|--------------------------------------|----------|---------|
| 1. | Memo of appeal | | 1 - 5 |
| 2. | Appointment Order dated 31.05.2014 | A | 6 - 7 |
| 3. | Charge Report dated 31.05.2014 | B | 8 |
| 4. | Attendance Register | C | 9 |
| 5. | Service Book | D | 10 - 17 |
| 6. | Pay Rolls | E | 18 - 19 |
| 7. | Departmental Appeal dated 09,07.2021 | F | 20 |
| 8. | Appellate Order Dated 16.09.2021 | G | 21 |
| 9. | Wakalatnama | | 22 |

APPELLANT

Through:



MUHAMMAD MAAZ MADNI,

ADVOCATE HIGH COURT, PESHAWAR

KHATTAK LAW ASSOCIATES,

Juma Khan Plaza, Warsak Raod, Peshawar

0333-9313113, 0345-9090737

muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

APPEAL NO. 7597 /2021

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

APPELLANT

VERSUS

1. THE DIRECTOR EDUCATION, Khyber Pakhtunkhwa,
near Govt. Hafnain Shaheed High School, Firdous, Peshawar.
2. THE DISTRICT EDUCATION OFFICER:
District Charsadda.
3. THE ACCOUNTANT GENERAL, KHYBER PAKHTUNKHWA,
Fori 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 APPELATE ORDER DATED 16-09-2021 (Communicated to the appellant through register post on 21-09-2021) WHEREBY THE DEPARTMENTAL APPEAL DATED 09-07-2021 OF THE APPELLANT WAS REGRETTEED ON NO GOOD GROUNDS

PRAYER:

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

Respectfully Submitted,

FACTS:

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

[Handwritten signature and date 29/7/21]

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

23

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

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

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

Copy of Service Book are attached as Annexure.....

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

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

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

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.

230
24

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 01st December that entitles the appellant for the annual increment of the year 2014.
- D- That act of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly

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 wealth of individuals including persons in the various service of Pakistan."
thus in light of the above the respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July & August 2014.
- F- That, the respondents acted in arbitrary and malafide manner while illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014.
- G- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014, is nothing but depriving the appellant from legal right of livelihood.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.


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

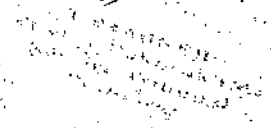
Dated: 15-10-2021

APPELLANT


ABDUL MUSAWIR

Through:


MUHAMMAD MAAZ MADNI
Advocate High Court, Peshawar




CERTIFICATE

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


ADVOCATE

AFFIDAVIT

I, Mr. ABDUL MUSAWIR s/o Muhammad Ali, do hereby solemnly affirm on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT
17101-3401857-5


NOTE:

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


ADVOCATE

LIST OF BOOKS:

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



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7597/2021

BEFORE: MRS. RASHIDA BANO 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 Elementary Education, Secondary Education Department, Peshawar.
2. The District Education Officer (M), Charsadda.
3. The Accountant General, Khyber Pakhtunkhwa, Peshawar Cant.

..... (Respondents)

Mr. Muhammad Maaz Madani
Advocate For appellant

Mr. Muhammad Jan
District Attorney For respondents

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

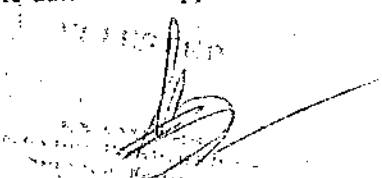
JUDGMENT

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

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

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

R



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.


28


29


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

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

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


 (MUHAMMAD AKBAR KHAN)
 Member (E)


 (RASHIDA BANO)
 Member (J)


 20/7/24


Date of Presentation of Application 30/7/24
 Number of Pages 7
 Copying Fee 35/-
 Lit. fee 4/-
 Total 40/-
 Name of Applicant
 Date of Receipt of Application 30/7/24
 Date of Delivery of Copy 30/7/24


ORDER
06.11.2023

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

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

30

31

To

The Director Education

Elementary and Secondary Education KP Peshawar.

Departmental Appeal

- i. The Appellants are the employee of the education Department, and were initially appointed as Primary School Teacher PST BPS-12 on ADHOC Basis after fulfilling all the legal and codal formalities required for the post under the law and Rules Regulation.
- ii. Appellants after scrutiny and through proper channel by the Departmental Selection Committee DSC Under the supervision of DEO Male and other respected members of the committee appointed the appellants as primary school teacher PST BPS-12 on dated 31-05-2014. (Copies of Appointment Order dated 31-05-2014 is attached)
- iii. the DEO has issued the appointments orders for the post of PST to all candidates, and when all the candidates received the appointment orders on dated 31-05-2014, they submitted their arrival reports and took over Charge reports of the PST Posts assigned in the appointments orders on dated 31-05-2014 and made entry in the Attendance Register in the respective quarters school, since then the appellant working with full zeal and according to the efficiency and with full devotion satisfaction of the School Head.
(Copies of Charge Reports dated 31-05-2014 and Register Attached)
- iv. Service Book of the Appellants also prepared and necessary entries were made therein in the service books from the date of initial appointments till date.
(Copies of Service Books are attached)
- v. after satisfactory duties of all the Adhoc Teachers, the Govt of Kp through Regularization Act 2017 including appellant in the year 2018 all were regularized from the date of their initial appointments orders i.e 31-05-2014. The date which is 31-05-2014 is also mentioned in the heading of the regularization order of the Appellant as well as other candidates of PST, and the appellants were placed at Serial No-71. (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

Tariq Jan S/O Badi Uz Zaman
(SPST, BPS-14) Government Primary
School Attaki No-3, Shabqadar District
Charsadda

TAR

2 پنجاب

طارق خان بنام ٹی ایچ ایف اے بیڈ نمبر

موردہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

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

کیلئے محلی ایس ایس ایل کے لئے

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 تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور

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

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

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

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

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

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائد 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 کالت نامہ لکھ دیا کہ سندر ہے۔

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ماہ

الرقوم

Accepted

Handwritten signature

Handwritten signature

طارق خان بنام ٹی ایف اے بیڈ