

FORM OF ORDER SHEET

Court of _____

Appeal No.

2428/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/11/2024	<p>The appeal of Mr. Imroz Khan resubmitted today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 18/11.2024. Parcha Peshi given to counsel for the appellant.</p>

By order of the Chairman


REGISTRAR

The appeal of Mr. Imroz Khan received today i.e on 25.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-B of the appeal is illegible and incomplete be completed and replaced by legible/better one.
- 2- In every document, the name of the appellant should be highlighted.

No. 952 /Inst./2024/KPST,

Dt. 25/10 /2024.

Amatullah
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mir Zaman Safi Adv.
High Court Peshawar:

Sir,

Re-submitted after compliance
AMATULLAH
07/11/2024

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

APPEAL NO. 2428 /2024

EMROZ KHAN

VS

EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 3.
2	Affidavit	4.
3.	Service book	A	5- 9.
5.	Promotion Notification	B	10- 12.
6.	Letter dated 19.11.2013	C	13- 15.
7.	Departmental appeal	E	16.
8.	Wakālat nama	17.

APPELLANT

THROUGH: 

MIR ZAMAN SAFI,

ADVOCATE

Room No. 6-E, 5th Floor,

Rahim Medical Centre,

Hashtnagri, Peshawar

0333-9991564

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 2428 /2024

Mr. Imroz Khan, PSHT(R) (BPS-15),
GPS Mama Khel, District Nowshera.....**APPELLANT**

VERSUS

- 1- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer (M), District Nowshera.
- 3- The District Account Officer, District Nowshera.

.....**RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR THE
GRANT PRE-MATURE INCREMENT ON PROMOTION FROM
BPS-14 TO BPS-15 SIMILARLY TO THE OTHER EMPLOYEES
AND AGAINST NO ACTION TAKEN ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN
THE STATUTORY PERIOD OF NINETY DAYS**

PRAYER:

That on acceptance of this service appeal the respondents may please be directed to grant pre-mature increment to the appellant upon promotion from BPS-14 to BPS-15 with other back benefits. Any other relief which this august Tribunal deems appropriate may also be granted in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:-

- 1- That the appellant was the employee of Elementary & Secondary Education Department and has served the department till his retirement on superannuation (60) years quite efficiently and upto the entire satisfaction of his superiors. Copy of the service book is attached as annexure.....A.
- 2- That during service the appellant was promoted from the post of PST (BPS-12) to the post of SPST (BPS-14) and subsequently promoted from SPST (BPS-14) to the post of PSHT (BPS-15) vide Notification dated 12.04.2013. Copy of the Notification dated 12.04.2013 is attached as annexure.....B.

(2)

- 3- That it is pertinent to mention that the pay of the appellant had been fixed in BPS-14 and then BPS-15 and as such the appellant also granted pre-mature increment in BPS-14 while pre-mature increment on promotion to BPS-15 has not been granted till date despite of the repeated requests. Copy of the service book is already attached as annexure.....A.
- 4- That the appellant and his other colleagues are fully entitled for double benefits of pre-mature increments upon promotion to the BPS-14 and subsequently to BPS-15 in light of Finance Department letter 19.11.2013 and as such the appellant and his other colleagues time and again requested for the same but the respondents are not willing to grant the said pre-mature increment. Copy of the letter dated 19.11.2013 is attached as annexure.....C.
- 5- That the appellant feeling aggrieved from the inaction of the respondents by not granting/issuing pre-mature increment to the appellant upon promotion to (BPS-15) preferred departmental appeal to the respondent No.1 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the departmental appeal is attached as annexure.....D.

GROUND:

- A- That the inaction of the respondents by not allowing/granting pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15) is against the law, facts, norms of natural justice and materials on the record.
- B- That the appellant has not been treated by the respondents 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 respondent department acted in arbitrary and malafide manner by not allowing/granting pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15).
- D- That the appellant is fully entitle for the grant of pre-mature increment upon promotion to the post of PSHT (BPS-15) in light of the letter dated 19.11.2013 and such violation of the judgment of the Khyber Pakhtunkhwa Service Tribunal, Peshawar in appeal No.770/2016 titled Muhammad Siddique Vs Accountant General, Khyber Pakhtunkhwa & others.
- E- That many colleagues of the appellant in service as well as retired employees have been granted the above mentioned benefits of pre-mature increments, therefore, in light of the judgment of the Apex Court reported in

(3)

1996 SCMR 1185 the appellant is fully entitled for the grant of pre-mature increment upon promotion to the post of PSHT (BPS-15) being similarly placed employee.

- F- That the inaction of the respondents by not granting pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15) is based on discrimination.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT
IMROZ KHAN

THROUGH:
MIR ZAMAN SAFI
ADVOCATE

CERTIFICATE:

It is certified that no other earlier appeal was filed between the parties.

Mir Zaman Safi
DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973.
- 2- SERVICES LAWS BOOKS.
- 3- ANY OTHER CASE LAW AS PER NEED.

(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE, PESHAWAR

APPEAL NO. _____ /2024

IMROZ KHAN

VS

EDUCATION DEPTT:

AFFIDAVIT

I, Mir Zaman Safi, Advocate, High Court on the instructions and on behalf of my client, do hereby solemnly affirm that the contents of this **APPEAL** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


**MIR ZAMAN SAFI
ADVOCATE**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

M/A

SERVICE APPEAL NO. _____ /2024

IMROZ KHAN

VS

EDUCATION DEPTT:

**APPLICATION FOR CONDONATION OF
DELAY IN FILING THE ABOVE NOTED
APPEAL**

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.
- B- That the appeal of the appellant is related to the financial matters, therefore, as per judgment of the Superior Courts reported in 2021 SCMR 1230 and 2002 PLC (C.S) 1388 limitation in financial matters could not run.
- C- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore, prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

APPELLANT

THROUGH: *Mir Zaman Safi*
MIR ZAMAN SAFI
ADVOCATE

"A"

NIC NO. 138-63-485609

3 NEW = 17201-2157271-3

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

1. Name MROZ KHAN

PNO 113165

2. Race Khalak (Muslim)

3. Residence Village Mama khel, Tehsil Nowshera.
District PESHAWAR.

4. Father's name and residence MOZAM DIN
(as above)

5. Date of birth by Christian era as
nearly as can be ascertained 3-9-1963 (Third September
N.H. Sixty three)

6. Exact height by measurement 5-7

7. Personal marks for identification Scar on Lt. side neck

8. Left hand thumb and Finger impres-
sion of (non-gazetted) officer

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant,

Mroz Khan

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

Sub. Divisional Edu. O.
DD Peshawar

ASOFI (Male)
Edu & Soc Edu
Circle Peshawar
Distt (N.W.F.P.)

(6)

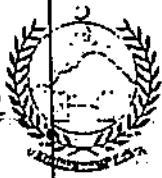
5

S/o original

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave Allocation of period of leave or average pay upto four months for which leave salary is debitable to another Government	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.
					Period		
S.D.B.O. (M) Peshawar Sub. Divisional Exam. Officer	30/11/88	ND	S. J. M. S. J. M.			Appointed as (UT) PTC vide D.O.C. Peshawar	
S.D.B.O. (M) Peshawar	18/12/88	Transfer	S. J. M. S. J. M.			Encl No. - 3936-60 dt. 26/12/87	
S.D.B.O. (M) Peshawar	18/12/88	Transfer	S. J. M. S. J. M.			Sub. Divisional Exam. Officer (M) Peshawar	
S.D.B.O. (M) Peshawar	18/12/88	Transfer	S. J. M. S. J. M.			Passed SSC Annual Examination in Session 1980 under R.N.O. 23809 from the P.S.E. Peshawar. Marks obtained 468/850	
S.D.B.O. (M) Peshawar	18/12/88	Transfer	S. J. M. S. J. M.			Marks obtained 468/850 with grade (D) passing grade good.	
S.D.B.O. (M) Peshawar	18/12/88	Transfer	S. J. M. S. J. M.			Sub. Divisional Exam. Officer (M) Peshawar	
S.D.B.O. (M) Peshawar	31/12/88	Service Verified	S. J. M. S. J. M.			Passed FA Examination in Session 1982 (Annual) under R.N.O. 24791 from the P.S.E. Peshawar. with the P.S.E. Peshawar registration No. 221-B/N-80 Etc & etc. Etc	
S.D.B.O. (M) Peshawar	31/12/88	Service Verified	S. J. M. S. J. M.			Circle Concentration Marks obtained 438/1000 Dist. (NSP) with grade (D) responsibility	
S.D.B.O. (M) Peshawar	31/12/88	Service Verified	S. J. M. S. J. M.			Fail	
S.D.B.O. (M) Peshawar	31/12/88	Service Verified	S. J. M. S. J. M.			Sub. Divisional Exam. Officer (M) Peshawar	
S.D.B.O. (M) Peshawar	31/12/88	Service Verified	S. J. M. S. J. M.			Service verified w.e.f. 2/12/88 to 18/2/89 from the agt. roll & other records of the Office.	
S.D.B.O. (M) Peshawar	31/12/88	Service Verified	S. J. M. S. J. M.			S. J. M. S. J. M.	

3

9	10	11	12	13	14	15		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 6		Date of termination of appointment	Reason of termination (such as promotion, transfer, dimission, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature 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.
D. D. O (M) P.R. Nowshera	24/11/09	A/Ret	D. D. O (M) P.R. Nowshera	DDO (M) E/SE NSR.	Service 11/12/09 Date 11/12/09	3.04/1/09	Edu	
D. D. O (M) P.R. Nowshera	20/11/09	Resi	D. D. O (M) P.R. Nowshera	DDO (M) E/SE NSR.	Service 11/12/09 Date 11/12/09	3.04/1/09	Edu	
D. D. O (M) P.R. Nowshera	11/12/09	A/Ret	D. D. O (M) P.R. Nowshera	DDO (M) E/SE NSR.	Service 11/12/09 Date 11/12/09	3.04/1/09	Edu	
D. D. O (M) P.R. Nowshera	11/12/09	A/Ret	D. D. O (M) P.R. Nowshera	ASDEO (Male) Ele & Sec Edu Guru Nanak Dev	Service Verified w.e.f. 01/12/2011 To 22/12/2011	01/12/2011	DDO (M) E/SE NSR.	
D. D. O (M) P.R. Nowshera	11/12/09	RS	District Accounts Officer Nowshera	15 Date Rupee Rs. 10000/- on Ad/o G.P. Fund Advance	Service Verified w.e.f. 01/12/2011 To 22/12/2011 The Acc Roll and Other Record of this Office	01/12/2011	D. D. O (M) P.R. Nowshera	
	10000/-	✓		99968 Promised T.C.B/T 11/4/09	GPA Sanction # H-10000/- Vicde Deo 2011/11/25 No. 1995-96 (t) 17/1/2013	17/1/2013		



(9)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA
(Office Phone#: 0923-9220228, Fax#: 0923-9220228)

RETIREMENT ORDER

Under the provision of Government of Khyber Pakhtunkhwa Finance Department letter no. FD (SR-IV) Vol.II dated 24-08-1983; sanction is hereby accorded to the grant of Encashment of Leave / Retirement detail given below in respect of the following official.

Sr.	Name of Official	Date of Retirement	Date of Birth	D/O 1 st Apptt:	Encashment of LPR	Total service Length Y-M-D	Remarks
01	Mr. Imroz Khan PSHT GPS Mama Khel Nowshera P.No.00133165	01-01-2018 (R.N)	03-09-1963	02-01-1988	360 days	29-11-29	Retire from Govt. Service on Premature.

ATTESTED

FAYAZ HUSSAIN
District Education Officer (Male)
Nowshera

File No. 2129.32 /DEO (M) NSR/EA-S/File No. 60/Retirement of PST/ Dated Nowshera the 07.12.2018.

Copy of the above is forwarded for information and necessary action to the:-

- 1: Senior District Account Officer, Nowshera.
- 2: Sub Divisional Education Officer (Male), Jehangira.
- 3: ADO Circle concerned.
- 4: Official concerned.

Dy: District Education Officer (Male)
Nowshera

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

(Office Phone #0923-9220228, Fax #0923-9220228)

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee (DPC) held on 12-2-2012 and in pursuance of the GO: No: SO (F) E-AMI-18/E&SE/2012 dated 11-07-2012 and inance Departmental Endorsement No: SO(FR)/ED/10-13(E)/2012 Dated 11-07-2012 the following Male Senior Primary School Teachers SPS/TS B-14 are hereby promoted to the post of HPST (B-15) Rs. 83,000/- following the existing policy of the Provincial Government in Teaching Cadre on the terms and conditions given below. They will be posted in GMS of the District against the newly updated HPST/BPS.

Total Number	EC Deposits	EC 305
Share of HPST	Sl.	406
Share of BPS	Sl.	406

S. No.	Name of Teacher	Designation	Date of Birth	BPS	Remarks
1.	Hameed Shah	K.ullah	GPS DAKISMAL KHAIL	01/05/1955	Will be adjusted/posted according to the rationalization policy
2.	Muhammad Naseer	H.ullah	GPS Ghafar Khan Korora	12/03/1953	DO
3.	Shahid Jahan	M. Ali	Baluk GPS	15/07/1955	DO
4.	Mohammad Kamran	M. Ali	Mohim Bindri GPS	19/06/1954	DO
5.	Mohammad Iqbal	M. Ali	Alibing GPS No 1	13/07/1955	DO
6.	Mohammad Imran	M. Ali	Alibing GPS No 2	12/07/1955	DO
7.	Mohammad Iqbal	M. Ali	Alibing GPS No 3	12/07/1955	DO
8.	Mohammad Iqbal	M. Ali	Gosra railway station	17/04/1953	DO
9.	Mohammad Iqbal	M. Ali	Babu Jodeed GPS No 1	17/04/1955	DO
10.	Masoom Khan	M. Ali	OPS Shagan	25/07/1950	DO
11.	Mohammad Iqbal	M. Ali	Jam Koraona GMPS	10/10/1951	DO
12.	Mohammad Iqbal	M. Ali	Akbarpur GPS No 1	22/04/1956	DO
13.	Mohammad Iqbal	M. Ali	Babu Jodeed GBS No 2	11/04/1957	DO
14.	Mohammad Iqbal	M. Ali	Babu Jodeed GBS No 3	12/04/1955	DO
15.	Mohammad Iqbal	M. Ali	Abdul abbas GPS No 2	12/04/1955	DO
16.	Mohammad Iqbal	M. Ali	GPS Khushab	04/01/1957	DO
17.	Mohammad Iqbal	M. Ali	Albadarai GPS No 2	13/02/1954	DO
18.	Mohammad Iqbal	M. Ali	GPS Langotabudhi	10/12/1953	DO
19.	Mohammad Iqbal	M. Ali	GPS Langotabudhi 2	01/05/1954	DO
20.	Mohammad Iqbal	M. Ali	Dan Jodeed GPS No 2	10/10/1955	DO
21.	Mohammad Iqbal	M. Ali	GPS Langotabudhi 1	15/07/1961	DO
22.	Mohammad Iqbal	M. Ali	GPS Khushab Bala	09/02/1961	DO
23.	Mohammad Iqbal	M. Ali	GPS Khushab Bala	21/03/1958	DO
24.	Mohammad Iqbal	M. Ali	GPS Langotabudhi	07/07/1961	DO
25.	Mohammad Iqbal	M. Ali	GPS Langotabudhi Korora	01/04/1961	DO
26.	Mohammad Iqbal	M. Ali	OPS Langotabudhi	13/09/1961	DO

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

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee (DPC) held on 12.2.2013 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No.SO (B&A)/1-18/E&SE/2012, dated 11.07.2012 and Finance Department Endorsement No. SO9FR/FD/10-22E/2010 dated 16.07.2012 the following Male Senior Primary School Teachers SPSTs B-14 are hereby promoted to the post of HPST B-15 (Rs-8500-700-29500) 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 they will be posted in GPS of the District against the newly upgraded HPST B-15 posts.

Total Numbers SPST Posts	1805
Share of HPST Post	4(16)
Share of Promotion 100%	4(16)

S#	S.L#	Name of Teacher	Father's Name	School	DOB	Remarks
1	5	Hamid Shah	Kaseer Ullah	GPS Dak Ismail Khail	01.05.1955	Will be adjusted/posted according to the rationalization policy
2	6	M. Nazeer	Toti Gul	GPS Giafar Khan Korona	12/03/1953	Do
3	7	9. Shah Jehan	M. Ali	Balu GPS	15/07/1955	Do
4.	9	I.M. Akbar	Sher Afzal	Mohib Banda GPS	19/06/1954	Do
5.	10	I.Mehmood Khan	Fazle Raziq	Akbar Pora GPS No.2	12/03/1955	Do
6.	13	I.Nasrullah Khan	M. Atta Ullah	Ali Baig GPS No.3	26/04/1953	Do
7	14	Shamsul Haq	Mir baz	GPS Railway Station	17/04/1955	Do
8	16	Hazrat Amin	Habib Ur Rehman	Babi Jadeed GPS No.1	12/04/1955	Do
9	18	Masam Khan	M. Sharif	GPS Shagai	25/07/1956	Do
10	19	Zaman Shah	Sikandar Shah	Jam Korona GPSM	10/10/1954	Do
11	20	Khaista Gul	Faqir Muhammad	Akbar Pura GPS No.1	22/04/1956	Do
12	24	Firdos Khan	Umar Gul	Babi Jadeed No.2	14/04/1957	Do
13	25	S. Riaz Hussain Shah	Syed Akbar Shah	Taru Jabba No.2	25/12/1955	Do
14	30	Gohar Ali	Salahuddin	GPS Kheshgi Bala	15/08/1954	Do
15	36	Shams Ur Rehman	Daulat Khan	GPS Dagbesud 1	01/01/1957	Do
16	39	Misal Khan	Mukamel Shah	Akbarpura GPS No.2	15/02/1954	Do
17	40	Aman Khan	Hamid Khan	GPS Dagbesud 1	05/12/1953	Do
18	41	Usman Shah	Zahir Shah	GPS Dagbesud 2	01/05/1954	Do
19	42	Gulroz Khan	Nawroz Khan	Dagi jaded GPS No.2	14/10/1955	Do
20	50	Roohul Amin	M. Kalim	GPS Kheshgi Payan No.1	15/01/1961	Do
21	51	M. Sadiq	Asadullah	GPS Kheshgi Bala	09/02/1961	Do
22	52	Ajmal Shah	Shamsul Wahid	GPS 2 Zkks	21/03/1958	Do
27	60	Shehr Yaz	Malook Shah	GMPS Mundori Bala	16/03/1963	Do
28	61	Ihsan Ullah	Wali Mohammad	Tarkha GPS No.2	15/10/1959	Do
34	73	Imroz Khan	Mozam Din	GPS Mama Khel	03/09/1963	Do
57	124	Anwar Soeed	Majid Gul	GPS Sharie Ahad	25/12/1962	Do

(11)

103	Mohammed Ali	Habibullah Khan	GPS No. 1	02/01/1962	DO
104	Waliullah Khan	CIMIC Officer	GPS No. 2	06/07/1962	DO
105	Waliullah Khan	1st Lt. GPS No. 3	GPS No. 3	25/07/1959	DO
106	Waliullah Khan	CIMIC Officer	GPS No. 4	28/01/1963	DO
107	Waliullah Khan	CIMIC Officer	GPS No. 5	18/04/1958	DO
108	Ali	Thari GPS No. 1	Thari GPS No. 1	02/05/1962	DO
109	Ali	Operational Station	Operational Station	18/12/1963	DO
110	Ali	Operational Station	Operational Station	18/05/1964	DO
111	Ali	Operational Station	Operational Station	18/05/1964	DO
112	Ali	Operational Station	Operational Station	18/05/1964	DO
113	Ali	Chak Chowk Thari GPS	Chak Chowk Thari GPS	01/04/1963	DO
114	Ali	GPS No. 1	GPS No. 1	07/07/1965	DO
115	Ali	GPS No. 2	GPS No. 2	01/04/1962	DO
116	Ali	Nasir Khan GPS	Nasir Khan GPS	25/12/1964	DO
117	Mohammed Ali	Baloch GPS	Baloch GPS	15/11/1953	DO
118	Zafar Ahmad	GPS Operator Payan 2	GPS Operator Payan 2	01/02/1964	DO
119	M. Rasool	Gumti Kalan	Gumti Kalan	11/04/1964	DO
120	M. Rasool	GPS No. 1	GPS No. 1	12/01/1964	DO
121	M. Rasool	GPS No. 2	GPS No. 2	12/02/1960	DO
122	M. Rasool	GPS No. 3	GPS No. 3	15/05/1962	DO
123	M. Rasool	GPS No. 4	GPS No. 4	28/08/1967	DO
124	M. Rasool	GPS No. 5	GPS No. 5	01/07/1964	DO
125	M. Rasool	Gumti Kalan	Gumti Kalan	01/07/1964	DO
126	M. Rasool	Gumti Kalan	Gumti Kalan	01/07/1964	DO
127	M. Rasool	Azamgarh Balot GPS No. 2	Azamgarh Balot GPS No. 2	10/06/1963	DO
128	M. Rasool	GPS No. 6	GPS No. 6	13/02/1957	DO
129	M. Rasool	GPS No. 7	GPS No. 7	22/07/1964	DO
130	M. Rasool	GPS No. 8	GPS No. 8	22/07/1964	DO
131	M. Rasool	OPP Operator Payan 1	OPP Operator Payan 1	18/12/1963	DO
132	M. Rasool	GPS No. 9	GPS No. 9	15/05/1962	DO
133	M. Rasool	GPS No. 10	GPS No. 10	02/12/1959	DO
134	M. Rasool	GPS No. 11	GPS No. 11	01/10/1962	DO
135	M. Rasool	GPS No. 12	GPS No. 12	25/12/1963	DO
136	M. Rasool	GPS No. 13	GPS No. 13	09/06/1958	DO
137	M. Rasool	GPS No. 14	GPS No. 14	13/09/1959	DO
138	M. Rasool	GPS No. 15	GPS No. 15	18/09/1962	DO
139	M. Rasool	GPS No. 16	GPS No. 16	25/12/1963	DO
140	M. Rasool	GPS No. 17	GPS No. 17	09/06/1958	DO
141	M. Rasool	GPS No. 18	GPS No. 18	13/09/1959	DO
142	M. Rasool	GPS No. 19	GPS No. 19	18/09/1962	DO
143	M. Rasool	GPS No. 20	GPS No. 20	25/12/1963	DO
144	M. Rasool	GPS No. 21	GPS No. 21	09/06/1958	DO
145	M. Rasool	GPS No. 22	GPS No. 22	13/09/1959	DO
146	M. Rasool	GPS No. 23	GPS No. 23	18/09/1962	DO
147	M. Rasool	GPS No. 24	GPS No. 24	25/12/1963	DO
148	M. Rasool	GPS No. 25	GPS No. 25	09/06/1958	DO
149	M. Rasool	GPS No. 26	GPS No. 26	13/09/1959	DO
150	M. Rasool	GPS No. 27	GPS No. 27	18/09/1962	DO
151	M. Rasool	GPS No. 28	GPS No. 28	25/12/1963	DO
152	M. Rasool	GPS No. 29	GPS No. 29	09/06/1958	DO
153	M. Rasool	GPS No. 30	GPS No. 30	13/09/1959	DO
154	M. Rasool	GPS No. 31	GPS No. 31	18/09/1962	DO
155	M. Rasool	GPS No. 32	GPS No. 32	25/12/1963	DO
156	M. Rasool	GPS No. 33	GPS No. 33	09/06/1958	DO
157	M. Rasool	GPS No. 34	GPS No. 34	13/09/1959	DO
158	M. Rasool	GPS No. 35	GPS No. 35	18/09/1962	DO
159	M. Rasool	GPS No. 36	GPS No. 36	25/12/1963	DO
160	M. Rasool	GPS No. 37	GPS No. 37	09/06/1958	DO
161	M. Rasool	GPS No. 38	GPS No. 38	13/09/1959	DO
162	M. Rasool	GPS No. 39	GPS No. 39	18/09/1962	DO
163	M. Rasool	GPS No. 40	GPS No. 40	25/12/1963	DO
164	M. Rasool	GPS No. 41	GPS No. 41	09/06/1958	DO
165	M. Rasool	GPS No. 42	GPS No. 42	13/09/1959	DO
166	M. Rasool	GPS No. 43	GPS No. 43	18/09/1962	DO
167	M. Rasool	GPS No. 44	GPS No. 44	25/12/1963	DO
168	M. Rasool	GPS No. 45	GPS No. 45	09/06/1958	DO
169	M. Rasool	GPS No. 46	GPS No. 46	13/09/1959	DO
170	M. Rasool	GPS No. 47	GPS No. 47	18/09/1962	DO
171	M. Rasool	GPS No. 48	GPS No. 48	25/12/1963	DO
172	M. Rasool	GPS No. 49	GPS No. 49	09/06/1958	DO
173	M. Rasool	GPS No. 50	GPS No. 50	13/09/1959	DO
174	M. Rasool	GPS No. 51	GPS No. 51	18/09/1962	DO
175	M. Rasool	GPS No. 52	GPS No. 52	25/12/1963	DO
176	M. Rasool	GPS No. 53	GPS No. 53	09/06/1958	DO
177	M. Rasool	GPS No. 54	GPS No. 54	13/09/1959	DO
178	M. Rasool	GPS No. 55	GPS No. 55	18/09/1962	DO
179	M. Rasool	GPS No. 56	GPS No. 56	25/12/1963	DO
180	M. Rasool	GPS No. 57	GPS No. 57	09/06/1958	DO
181	M. Rasool	GPS No. 58	GPS No. 58	13/09/1959	DO
182	M. Rasool	GPS No. 59	GPS No. 59	18/09/1962	DO
183	M. Rasool	GPS No. 60	GPS No. 60	25/12/1963	DO
184	M. Rasool	GPS No. 61	GPS No. 61	09/06/1958	DO
185	M. Rasool	GPS No. 62	GPS No. 62	13/09/1959	DO
186	M. Rasool	GPS No. 63	GPS No. 63	18/09/1962	DO
187	M. Rasool	GPS No. 64	GPS No. 64	25/12/1963	DO
188	M. Rasool	GPS No. 65	GPS No. 65	09/06/1958	DO
189	M. Rasool	GPS No. 66	GPS No. 66	13/09/1959	DO
190	M. Rasool	GPS No. 67	GPS No. 67	18/09/1962	DO
191	M. Rasool	GPS No. 68	GPS No. 68	25/12/1963	DO
192	M. Rasool	GPS No. 69	GPS No. 69	09/06/1958	DO
193	M. Rasool	GPS No. 70	GPS No. 70	13/09/1959	DO
194	M. Rasool	GPS No. 71	GPS No. 71	18/09/1962	DO
195	M. Rasool	GPS No. 72	GPS No. 72	25/12/1963	DO
196	M. Rasool	GPS No. 73	GPS No. 73	09/06/1958	DO
197	M. Rasool	GPS No. 74	GPS No. 74	13/09/1959	DO
198	M. Rasool	GPS No. 75	GPS No. 75	18/09/1962	DO
199	M. Rasool	GPS No. 76	GPS No. 76	25/12/1963	DO
200	M. Rasool	GPS No. 77	GPS No. 77	09/06/1958	DO
201	M. Rasool	GPS No. 78	GPS No. 78	13/09/1959	DO
202	M. Rasool	GPS No. 79	GPS No. 79	18/09/1962	DO
203	M. Rasool	GPS No. 80	GPS No. 80	25/12/1963	DO
204	M. Rasool	GPS No. 81	GPS No. 81	09/06/1958	DO
205	M. Rasool	GPS No. 82	GPS No. 82	13/09/1959	DO
206	M. Rasool	GPS No. 83	GPS No. 83	18/09/1962	DO
207	M. Rasool	GPS No. 84	GPS No. 84	25/12/1963	DO
208	M. Rasool	GPS No. 85	GPS No. 85	09/06/1958	DO
209	M. Rasool	GPS No. 86	GPS No. 86	13/09/1959	DO
210	M. Rasool	GPS No. 87	GPS No. 87	18/09/1962	DO
211	M. Rasool	GPS No. 88	GPS No. 88	25/12/1963	DO
212	M. Rasool	GPS No. 89	GPS No. 89	09/06/1958	DO
213	M. Rasool	GPS No. 90	GPS No. 90	13/09/1959	DO
214	M. Rasool	GPS No. 91	GPS No. 91	18/09/1962	DO
215	M. Rasool	GPS No. 92	GPS No. 92	25/12/1963	DO
216	M. Rasool	GPS No. 93	GPS No. 93	09/06/1958	DO
217	M. Rasool	GPS No. 94	GPS No. 94	13/09/1959	DO
218	M. Rasool	GPS No. 95	GPS No. 95	18/09/1962	DO
219	M. Rasool	GPS No. 96	GPS No. 96	25/12/1963	DO
220	M. Rasool	GPS No. 97	GPS No. 97	09/06/1958	DO
221	M. Rasool	GPS No. 98	GPS No. 98	13/09/1959	DO
222	M. Rasool	GPS No. 99	GPS No. 99	18/09/1962	DO
223	M. Rasool	GPS No. 100	GPS No. 100	25/12/1963	DO
224	M. Rasool	GPS No. 101	GPS No. 101	09/06/1958	DO
225	M. Rasool	GPS No. 102	GPS No. 102	13/09/1959	DO
226	M. Rasool	GPS No. 103	GPS No. 103	18/09/1962	DO
227	M. Rasool	GPS No. 104	GPS No. 104	25/12/1963	DO
228	M. Rasool	GPS No. 105	GPS No. 105	09/06/1958	DO
229	M. Rasool	GPS No. 106	GPS No. 106	13/09/1959	DO
230	M. Rasool	GPS No. 107	GPS No. 107	18/09/1962	DO
231	M. Rasool	GPS No. 108	GPS No. 108	25/12/1963	DO
232	M. Rasool	GPS No. 109	GPS No. 109	09/06/1958	DO
233	M. Rasool	GPS No. 110	GPS No. 110	13/09/1959	DO
234	M. Rasool	GPS No. 111	GPS No. 111	18/09/1962	DO
235	M. Rasool	GPS No. 112	GPS No. 112	25/12/1963	DO
236	M. Rasool	GPS No. 113	GPS No. 113	09/06/1958	DO
237	M. Rasool	GPS No. 114	GPS No. 114	13/09/1959	DO
238	M. Rasool	GPS No. 115	GPS No. 115	18/09/1962	DO
239	M. Rasool	GPS No. 116	GPS No. 116	25/12/1963	DO
240	M. Rasool	GPS No. 117	GPS No. 117	09/06/1958	DO
241	M. Rasool	GPS No. 118	GPS No. 118	13/09/1959	DO
242	M. Rasool	GPS No. 119	GPS No. 119	18/09/1962	DO
243	M. Rasool	GPS No. 120	GPS No. 120	25/12/1963	DO
244	M. Rasool	GPS No. 121	GPS No. 121	09/06/1958	DO
245	M. Rasool	GPS No. 122	GPS No. 122	13/09/1959	DO
246	M. Rasool	GPS No. 123	GPS No. 123	18/09/1962	DO
247	M. Rasool	GPS No. 124	GPS No. 124	25/12/1963	DO
248	M. Rasool	GPS No. 125	GPS No. 125	09/06/1958	DO
249	M. Rasool	GPS No. 126	GPS No. 126	13/09/1959	DO
250	M. Rasool	GPS No. 127	GPS No. 127	18/09/1962	DO
251	M. Rasool	GPS No. 128	GPS No. 128	25/12/1963	DO
252	M. Rasool	GPS No. 129	GPS No. 129	09/06/1958	DO
253	M. Rasool	GPS No. 130	GPS No. 130	13/09/1959	DO
254	M. Rasool	GPS No. 131	GPS No. 131	18/09/1962	DO
255	M. Rasool	GPS No. 132	GPS No. 132	25/12/1963	DO
256	M. Rasool	GPS No. 133	GPS No. 133	09/06/1958	DO
257	M. Rasool	GPS No. 134	GPS No. 134	13/09/1959	DO
258	M. Rasool	GPS No. 135	GPS No. 135	18/09/1962	DO
259	M. Rasool	GPS No. 136	GPS No. 136	25/12/1963	DO
260	M. Rasool	GPS No. 137	GPS No. 137	09/06/1958	DO
261	M. Rasool	GPS No. 138	GPS No. 138	13/09/1959	DO
262	M. Rasool	GPS No. 139	GPS No. 139	18/09/1962	DO
263	M. Rasool	GPS No. 140	GPS No. 140	25/12/1963	DO
264	M. Rasool	GPS No. 141	GPS No. 141	09/06/1958	DO

Better Copy of Page - 11

120	240	Noor Ul Amin	M. Amin	GPS Hamza Rashaka No.2	12.04.1967	Do
121	242	Afzal Khan	Afsar Khan	GPS Rokhan Abad K. Bala	15/02/1967	Do
122	245	M. Israr Khan	Nisar Khan	GPS Kabul River	02/01/1964	Do
123	247	Sharafat Ullah	Amir Nawaz Khan	GPS 1 Badrashi	08/03/1962	Do
124	248	M. Ahsan	M. Salih	GPS No. MsKalan	08/05/1962	Do
125	250	Abdul Munaf	Ghulam Muhammad	Akbar Pura GPS No.3	15/10/1962	Do
126	253	Manzoor Hussain	Abdul Khaliq	Pabbi GPS No.1	06/11/1960	Do
127	254	M. Gul	Baghi Gul	GPS Ashraf Khan Korona	01/04/1966	Do
128	255	Khaista Gul	Qadir Shah	GPS Naseer Abad	12/05/1963	Do
129	256	Amanat Khan	Umara Khan	GPS Zaidi Colony	14/03/1969	Do
130	257	Qamar Zaman	Nurshid Khan	GPS Dagbesud. 2	10/08/1955	Do
131	259	Subidar Shah	Gohar Shah	GPS No.1 Mian Esa	12/11/1960	Do
132	260	Safdar Ali	Sardar Ali	Banda Nabi GPS No.1	01/04/1963	Do
133	262	Riaz Ali	Kamil Khan	Azakhel Bala GPS No.2	02/10/1964	Do
134	264	Khair Ul Abrar	Sayyed Ul Abrar	Khan Sher Garhi GPS	15/04/1967	Do
135	266	Ihsan Ur Rehman	M. umar	GPS Sheen Bagh	05/01/1958	Do
136	268	Aman Ullah	Jaidad Khan	GPS Labi Khel	15/02/1961	Do
137	269	Jehangir Khan	Inam Ali	GPS Afrido Killi	02/02/1963	Do
138	274	Khail Bahadar	Nawab Gul	GPS Feroz sons	05/04/1963	Do
152	292	M/Suleman	Ilyas Khan	GPS Usman Abad	15/06/1969	Do
153	293	Abdul Ghani	Abdul Qadir	GPS Zaidi Colony	15/04/1970	Do
154	295	Amir Khan	Islahud Din	GPS Batakzai	03/03/1970	Do
155	297	Amir Nawaz Khan	Hayat Khan	Khan Sher Ghari GPS	21/09/1967	Do
156	298	Shah Nazar	Sarwar Khan	GPS Zando Banda	29/09/1970	Do
157	300	Muhammad Fayaz	Fazal-e-Razaq	Banda Mulahan GPS	21/10/1970	Do
158	302	Nazf Ur Rehman	Ahmad Quraish	Ghoki Gul Badshah GPS	22/11/1966	Do
159	304	Muhammad Irfan	Tameez Gul	GPS Spin Khak 3	02/08/1966	Do
160	305	Hukam Said	Tor Gul	GPS Manhi	14/04/1964	Do
161	306	Hussain Muhammad	Sher Zada	Khan Sher Garhi GPS	12/04/1963	Do
162	307	Wasim Gul	Mehrab Gul	GPS Shahab Khel	01/12/1964	Do
163	308	Haydar	Raheem Khan	GPS Abbas Abad	01/05/1965	Do
167	312	Burhan Ud Din	Aman Ud Din	GPS Garu	10/11/1969	Do
175	329	Sardaraz Khan	Tawas Khan	GPS Serai Korona	10/02/1967	Do
176	330	Saida Gul	Sajeed Gul	GPS Ali Garh	04/09/1967	Do
187	347	Muhammad Zahir	Naseem Khan	GPS No.4 Pir Piai	01/10/1969	Do
188	348	Musa Khan	Raza Khan	Balu GPS	05/12/1964	Do
217	387	Muhammad Jan	Abdul Akbar	GPS Sikaidar Abad	04/04/1966	Do
218	390	Javed Khan	Mehrab Gul	GPS 2 Shaidu	15/10/1966	Do
219	391	Basal Bota	Boota	GPS Kabul River	04/07/1962	Do

(12)

		GPS Number	10/04/1965	DO
		GPS Model No.	12/02/1968	DO
		Gps Number	12/02/1969	DO
		Gps Number	16/05/1966	DO
		GPS Model No.	11/09/1966	DO
		Gps Number	09/02/1967	DO
		GPS Model No.	10/04/1965	DO
		GPS Model No.	10/03/1965	DO
		GPS Model No.	17/11/1967	DO
		Gps Number	10/04/1968	DO
		Fax GPS Model No.	12/04/1960	DO
		Gps Number	02/11/1965	DO
		Gps Number	12/11/1969	DO
		Gps Number	26/12/1968	DO
		GPS Model No.	12/03/1964	DO
		Azidil Pagan GPS No. 1	10/05/1961	DO
		GPS Model No.	06/03/1964	DO
		GPS Model No.	08/05/1968	DO
		Akbar Khan GPS No. 1	04/01/1969	DO
		GPS Model No.	07/06/1959	DO

It is decided that the above mentioned teachers will be paid one year's salary in arrears from the date of issue of this circular. The same will be paid in two installments by the Govt. in two equal amounts. Their performance will be monitored by the District Education Officer. Any teacher who fails to meet the required standards will be disciplined under the rule framed by the Govt. in time.

It is also decided that the teachers will be paid their salaries in arrears in monthly installments. The amount of arrears will be recorded in the books of the effect that no over payment is made. If any teacher is promoted in his/her service, his/her salary will be revised and if he/she is wrongly promoted, his/her salary will be reversed.

(Haji) Mushtaq Ali Khan
District Education Officer (D.E.O.)
Nowshera

District Education Officer (D.E.O.)
Nowshera

BETTER COPY PAGE- 12

387	617	M. Ibrahim	Bakht Manan	GPS Rashakai	28/03/1965	Do
388	618	Shah Qasim	Umer Said	GPS Mughalki	02/05/1958	Do
389	619	Shoaib	Muhsin Ullah	GPS Baitul Gharib	12/03/1969	Do
390	620	Zaib M. Gul	Didar Gul	GPS Aba Khel Wali	16/05/1966	Do
391	621	Sajid Khan	Suhbat Khan	GPS 3 Cantt.	11/09/1966	Do
392	623	Fayaz Ahmad	Ghulam Mehboob	GPS No.4 Nsr Kalan	01/03/1967	Do
393	624	Gohar Ali	Duran Khan	GPS Saies Mandir	10/04/1965	Do
394	625	Rahamdin	Abdus Satar	GPS Rashakai	10/05/1965	Do
395	627	M. Hussain	Ghulam Muhammad	Ghari Momeen GPS	17/11/1967	Do
396	628	Ijaz Muhammad	Badshah Muhammad	GPS Kana Khel	30/04/1968	Do
397	629	Khizar Ali	Hazrat Ali	Fazal Koroona GPS	12/04/1960	Do
398	630	Zahir Gul	Dawood Gul	GPS 1 zkks	02/11/1965	Do
399	631	Ayaz Ali Shah	Hashim Ullah	GPS 2 Bahadar Khel	10/11/1969	Do
400	633	Rashid Ali	Mali Shah	GPS AC Centre	26/12/1968	Do
401	635	Jehanzeb	Zahid Din	GPS Abbasabad	12/03/1964	Do
402	636	Majar Shah	Saeed Shah	AZakhel Payan GPS No.1	10/05/1961	Do
403	638	Sadeem Khan	Sanubar Khan	GPS Speen Khak 1	06/03/1964	Do
404	640	Khan Mir	Shehzad Mir	GPS Dak Ismail Khel 1	08/05/1968	Do
405	641	Farhad Ullah	Aman Ullah	Akbar Pura GPS No.3	04/01/1969	Do
406	642	Khan Muhammad	Ghulam Haider	GPS Ahmad Gul Korona	07/06/1959	Do

TERMS AND CONDITIONS:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by same rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time in case of their performance was found unsatisfactory during probation period. In case of misconduct, they will be proceeded under the rule framed from time to time.
4. Charge should be submitted to all concerned.
5. Their inter-se-seniority on their post will remain intact.
6. No TA/DA is allowed for joining their duties.
7. They will give an under taking to be recorded in their service books to the effect that any over payment is made to them in the light of this order will be recovered and if he is wrongly promoted he will be reversed.

(HAJI HASANAT GUL KHATTAK)

District Education Officer (Male)

Nowshera

Endst. No. 1817-22 Dated Nowshera the 12/04/2013

C
4X1

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD (SOSR-1) 12-2/2013
Dated Peshawar the / 19-11-2013

(B)

To:

The Accountant General, Khyber Pakhtunkhwa,
Peshawar.

Subject:

GUIDANCE REGARDING FIXATION OF PAY IN REGARD DIFFERENCE
CATEGORIES OF TEACHERS.

Dear Sir,

I am directed to refer to your letter No. H-24(414)/Edu
Copy/2013-14/1991 dated 12-09-2013 on the subject noted above and to
state that the view point of AG Office is hereby confirmed / endorsed for
further necessary action as desired.

Yours Faithfully,


(Wazir Muhammad Afgar)
SECTION OFFICER (SR-1)

Accountant General Khyber Pakhtunkhwa Peshawar
Phone: 091 9211250-3

No. H-24(113)/Edu Master/2012-13/ 22-067
Copy forwarded for information and compliance to:

DATED 21-11-2013

1. All DAOs/AAOs in Khyber Pakhtunkhwa.
2. HR Lab.
3. Pay Roll 2, 5 & 3 Section (L).
4. CIA Cell.
5. Accounts Officer (Pay Fixation Party).


ACCOUNTS OFFICER (HAD) 28/11/13

14
12416

Office of the
Accountant General

Khyber Pakhtunkhwa Peshawar
Phone: 091/9211250-53

No.H-244(14)/EduCorp/2013-14/ 99

Dated: 02.09.2013

To:

The Secretary
To Govt. of Khyber Pakhtunkhwa
Finance Deptt. Peshawar.

Subject:

**GUIDANCE REGARDING FIXATION OF PAY IN REGARD
TO DIFFERENT CATEGORIES OF TEACHERS.**

Memo:

1. Kindly refer to the Elementary & Secondary Education Deptt. Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 duly endorsed by the Finance Deptt. vide NO.SO(FR)/PD/10-22(E)/2010 dated 16.7.2012 regarding up-gradation/re-designation of posts of different categories of teachers.

2. It is added in the above cited notification that "the posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Deptt. by making necessary services rules or amending the existing service rules, if any, for the post". Later on the Elementary & Secondary Education Deptt. framed the rules and circulated amongst all concerned teacher cadre vide Notification No.SO(PF)4-5/SSR/Meeting/2012 dated 13.11.2012 for filling the post. (copy enclosed for ready reference).

3. According to the said rules the District Education Officer's granted BPS-12 to the existing PTC teachers & re-designated as PST teachers. Some of them promoted from BPS-12 to BPS-14 having 05 years service re-designated as Sr.PST. While certain of them promoted from BPS-14 to BPS-15 on same day and re-designated as Primary School Head teacher having 10 years service. An example of fixation made by the DEOs is given below:-

Mr. A. — pay on 6.1.2013 as PST (BPS-12) Rs.14500/- PM.
Promoted as Sr.PST on 7.1.2013 to BPS-14 RS.15320/-PM (Next stage + Premature).
Then from promoted as PSHT on 7.1.2013 to BPS-15 Rs.16200/-PM (Next stage + premature).

All
H.R.L
Pay Ac
C.I.A.C
Accou

2a

(S)

W/C 1737 C 3/4
This office is of the view that the pay on promotion from BPS-14 to is contrary to the instruction issued by the Finance Deptt letter G.O.M.R. SR-II-1-S/76-II dated 15.12.1981 as there incumbents not rendered service in BPS-14 for 3 years and therefore their pay has to be fixed directly from BPS-12 to BPS-15 and granted them next stage + premature in BPS-15 instead of BPS-12 to BPS-14 and then from BPS-14 to BPS-15.

5. In view of above if the mode of fixation stated in para 4 above is correct may kindly be confirmed or advised for future processing of the subject issue as the fixation of these employees lying pending in the DAOs.

Encl: As above.

Dy Accountant General (HAD)

Copy forwarded for information to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Deptt, Peshawar with the request also to examine the issue and directed all DEOs not to submit the cases to Audit Offices before confirmation of the view of this office is clarified by the Finance Deptt.
2. All DAOs/AAOs in Khyber Pakhtunkhwa.
3. The Distt Accounts Officer Swabi with reference to their letter dated 29.7.2013.

Dy Accountant General (HAD)

To,

The Director,
E&SE Department,
Khyber Pakhtunkhwa, Peshawar.

(D)

(15)

Subject: **DEPARTMENTAL APPEAL FOR THE GRANT PRE-MATURE INCREMENT ON PROMOTION FROM BPS-14 TO BPS-15 SIMILARLY TO THE OTHER EMPLOYEES WHO HAVE ALREADY BEEN GRANTED THE SAME BENEFIT BY THE DEPARTMENT**

Respected Sir,

With due respect it is most humbly stated that the appellant was the employee of your good self department and has served the education department till his retirement on superannuation (60) years quite efficiently and upto the entire satisfaction of his superiors. That during service the appellant was promoted from the post of PST (BPS-12) to the post of SPST (BPS-14) and subsequently promoted from SPST (BPS-14) to the post of PSHT (BPS-15) vide Notification dated 12.04.2013. That it is pertinent to mention that the pay of the appellant had been fixed in BPS-14 and then BPS-15 and such the appellant also granted pre-mature increment in BPS-14 while pre-mature increment on promotion to BPS-15 has not been granted till date despite of the repeated requests. That the appellant and his other colleagues are fully entitled for double benefit upon promotion to the BPS-14 and subsequently to BPS-15 in light of Finance Department letter 19.11.2013 but the department is not willing to grant pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15) which is clear violation of the letter dated 19.11.2013 and such violation of the judgment of the Khyber Pakhtunkhwa Service Tribunal, Peshawar in appeal No.770/2016 titled Muhammad Siddique Vs Accountant General, Khyber Pakhtunkhwa & others. That many colleagues of the appellant in service as well as retired employees have been granted the above mentioned benefits of pre-mature increments, therefore, in light of the judgment of the Apex Court reported in 1996 SCMR 1185 the appellant is fully entitled for the grant of pre-mature increment upon promotion to the post of PSHT (BPS-15) being similarly placed employee. That the denial for the grant of pre-mature increment upon promotion to BPS-15 is clear violation of Article-4, 25 and 38(e) of the Constitution of Islamic Republic of Pakistan, 1973.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal the appellant may very kindly be granted pre-mature increment upon promotion to BPS-15 in terms of his pension with all other financial benefits.

Dated: 19.06.2024.


APPELLANT

Imroz Khan, PSHT(Rtd),
GPS Mamakhel, Nowshera

(17)

(6)

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

OF 2024

Suroz Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

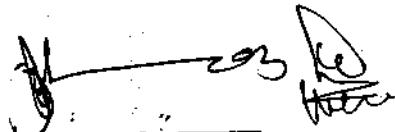
Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/we Suroz Khan

Do hereby appoint and constitute **MIR ZAMAN SAFI**, Advocate, Peshawar to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. / / 2024



CLIENT


ACCEPTED

MIR ZAMAN SAFI
ADVOCATE

OFFICE:

Room No.6-E, 5th Floor,
Rahim Medical Centre, G.T Road,
Hashtnagri, Peshawar.
Mobile No.0333-9991564
0317-9743003

၁၃၀၅၄၆၂

ရန်ကုန်မြို့၊ ရန်ကုန်မြို့

မန္တလေး

P.S.H.T (၁၇၈)

၁၅-၁၁

၃၀၉