

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL # 1134/2023

Mr,Saeed Ur Rehman.....Appellant.

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents.

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Dependent

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 1134/2023

Mr, Saeed Ur RehmanAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, **Motasim Billah Shah**, Secretary, Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

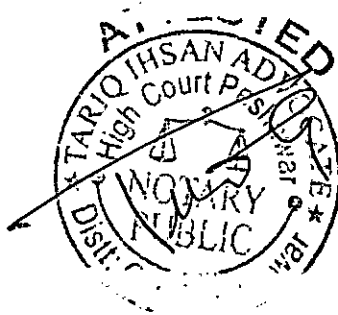
It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.

DEPONENT

Motasim Billah Shah

Secretary
E&SE Department Peshawar

Respondent no-3



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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that **Mr. Amjid Ali, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar **SA#1134/2023 Case Titled Saeed Ur Rehman, District Peshawar , vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.**

DEPONENT


Motasim Billah Shah

**Secretary
E&SE Department Peshawar**

Respondent No-3

(3)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

In Service Appeal No. 1134/2023

Mr. Saeed Ur Rehman.....Appellant.

VERSUS

Chief Secretary to Govt of KPK Peshawar..... Respondents.

PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. ~~02023~~ 03.

Respectfully Sheweth,

Preliminary Objections:

1. That the appellant has got no cause of action against the respondents.
2. That the appellant is just wasting the precious time of this Honorable Tribunal.
3. That the appeal in hand is just filed to pressurize the respondents for getting unfair and undue service advantages.
4. That the appellant is estopped by his own conduct to file the present appeal.
5. That the appellant concealed material facts from this Honorable Court, therefore not entitle to any relief.
6. That the appellant is serving on a very responsible seat and there is no space for any mistake or omission in any text books for the students, but in the case of appellant is clearly guilty of the issue for non-printing of an important chapter of Khatm-E-Nabowat in Islamiyaht book of grade.
7. That the punishment provided to the appellant is much lessor or than the omission on the part of the appellant.
8. That the appellant has not come to the Court with clean hands, therefore is not entitled to any relief.
9. That the appeal in hand is liable to be dismissed summarily alongwith heavy compensatory cost.

**Khyber Pakhtunkhwa
Service Tribunal**
Diary No. 9693
Dated 05-12-23

On FACTS

1. In response to Para-1, it is stated that the appellant has omitted his official duties while performing on a very important post.
2. In response to Para-02, it is stated that the omission on the post of appellant is not excusable. Khatm-E-Nabowat is one of the basic organ of Islam and depriving the students of such knowledge is not only a sin but also a crime, therefore the appellant cannot be relinquished of such responsibility which occurred due to omission on his part.
3. Incorrect, the appellant was proceeded against in accordance with law.
4. Incorrect, hence denied. It is just as stated to misguide this Honorable Tribunal.
5. Incorrect, hence denied. Every opportunity was afforded to the appellant for his defense to which he was failed.


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6. Pertains to record of the disciplinary proceedings against the appellant.
7. Incorrect, hence denied.
8. Incorrect to the extent of not providing defense to the appellant, as stated in above reply the appellant failed to defend his omission and was proceeded against in accordance with law.
9. Incorrect, the appellant has no right of appeal being guilty of omission on his part. Therefore, the appeal is liable to be dismissed with cost.

On Grounds:

- A. Incorrect, the order dated 13-10-2022 and 10-01-2023 are in accordance with law.
- B. Incorrect, the appellant has been treated according to law & rules.
- C. Incorrect, hence denied, the appellant by himself failed to defend his case.
- D. Incorrect, hence denied. The appellant was proceeded against by the competent authority.
- E. Incorrect, hence denied a proper opportunity was provided to the appellant.
- F. Incorrect, hence denied and not applicable in the case of the appellant.
- G. Incorrect, hence denied detailed reply is given above.
- H. Incorrect, the penalty is awarded to the appellant because of his unlawful omission in a very responsible and sensitive matter.
- I. Incorrect, the appellant willfully was negligent and omitted the performance of his duty.
- J. Incorrect, the detail reply is given above
- K. Incorrect not applicable to the case of appellant.
- L. Incorrect and not permissible the respondent also seeks permission advantage further grounds at the time of arguments.

It is therefore, most humbly requested that the appeal in hand may kindly be dismissed being devoid of merit


Motaism Billah Shah
SECRETARY
Elementary & Secondary Education,
(Respondents No. 02, 03)

Most Immediate



GOVERNMENT OF KHYBER PAKHTUNKHWA

Elementary & Secondary Education Department

Block "A" Opposite MPA's Hostel, Civil Secretariat, Peshawar

Phone: 091-9223532, Fax #: 091-9211419

E.mail: abesedept955@gmail.com

No. SO (BT)/E&SED/8-6/2019/Free Books

Dated Peshawar the 15.05.2019

To

1615/19

The Chairman
Khyber Pakhtunkhwa Textbook Board,
Peshawar.

Subject: REPORT OF THE ENQUIRY COMMITTEE REGARDING THE ISSUE OF MISSING/DELETION/NON-PRINTING OF AN IMPORTANT CHAPTER PERTAINING TO KHAT-E-NABOWAT IN THE TEXTBOOKS OF ISLAMIAT GRADE-4TH

I am directed to refer to the subject noted above and to convey that the competent authority/Chief Secretary Khyber Pakhtunkhwa has been pleased to approve following recommendations of the inquiry committee:-

- a. The printed books of Islamiat Grade - 4th both Urdu and Pashto version may be immediately banned and recalled from the schools / students.
- b. Fresh and corrected copies of the book (Urdu & Pashto versions) may be printed and distributed after fulfilling all codal formalities.

You are therefore directed to initiate immediate action on above and submit implementation report to this department at the earliest.

Endst.No. & Date Even:

(LAL SAEED KHATTAK)
SECTION OFFICER (B/T)

Copy is forwarded for information to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar
2. Director DCTE Abbottabad.
3. PS to Chief Secretary, Khyber Pakhtunkhwa.
4. PS to Advisor to Chief Minister for E&SE.
5. PS to Secretary, E&SE Department.
6. PA to Additional Secretary (Estab) E&SE Department.
7. PA to DS(Admn), E&SE Department.

Section Officer (Boards/Training)
Elementary & Secondary Education
Department, Khyber Pakhtunkhwa

SECTION OFFICER (B/T)

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3/11/2019

ENQUIRY REPORT

REPORT OF THE ENQUIRY COMMITTEE REGARDING THE ISSUE OF MISSING/DELETION/ NON- PRINTING OF AN IMPORTANT CHAPTER PERTAINING TO KHATM-E-NABOWAT IN THE TEXTBOOKS OF ISLAMIAT GRADE – 4TH

In pursuance of Elementary & Secondary Education Department, Govt. of Khyber Pakhtunkhwa Notification No. SO(B/T)E&SED/8-6/2019/Free books dated 22-04-2019, a committee comprising of the following Officers was constituted to probe the issue of exclusion of Khatm-e-Nabowat contents from the Islamiyat Books of Grade – 4th for the Government schools printed for the Academic Year 2019-20.

- | | |
|---|---------------|
| 1. Additional Secretary (Estab.), E&SE Department | ---- Chairman |
| 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar | ---- Member |
| 3. Director DCTE, Khyber Pakhtunkhwa, Abbottabad | ---- Member |
| 4. Secretary KP Textbook Board, Peshawar | ---- Member |

TORS OF THE COMMITTEE

- To look into the issue of missing/ deletion/ non printing of an important chapter pertaining to Khatm-e-Nabowat in the Islamiyat Books of Grade – 4th for the Government schools for the Academic Year 2019-20.
- To ascertain factual position and fix responsibility.

Accordingly, the Enquiry Committee took over the assigned task and its meetings were held w.e.f 24-04-2019 to 26-04-2019 & 29-04-2019 at 11:00 AM in the office of the Additional Secretary (Estab.) of E&SE Department, Chairman of the Enquiry Committee. The committee scrutinized the books and record provided by KP Textbook Board and DTCE. Copies of the Textbooks for government schools from the Academic Year 2014-15 to 2019-20 were examined. After detailed discussions and deliberations and perusal of the Textbooks regarding the issue, the committee observed the following facts.

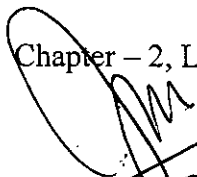
(A) FACTS

- In the textbooks of Islamiyat Grade – 4th, printed for govt. schools for the Academic Years 2014-15, 2015-16, 2016-17 and 2019-20, the following contents were found.

Chapter – 2, Lesson 1, Page 13 (Line No. 4-8)

----- سب سے آخر میں حضرت محمد صلی اللہ علیہ وآلہ وسلم تشریف لائے۔ آپ ﷺ اللہ تعالیٰ کے آخری رسول اور نبی ہیں۔ یعنی قیامت تک آنے والے تمام انسانوں کی رہنمائی کا واحد ذریعہ آپ صلی اللہ علیہ وآلہ وسلم کا لایا ہوا پیغام یعنی قرآن مجید اور آپ صلی اللہ علیہ وآلہ وسلم کی سنت و سیرت ہے۔ اس کا مطلب یہ ہے کہ اب صرف حضرت محمد صلی اللہ علیہ وآلہ وسلم کے بتائے ہوئے طریقوں پر عمل کرنے سے دنیا و آخرت میں کامیابی اور نجات مل سکتی ہے۔

Chapter – 2, Lesson 1, Page 14 Exercise (Questions 1-5)


Section Officer (Boards/Training)
Elementary & Secondary Education
Department, Khyber Pakhtunkhwa

- ۱۔ عقیدہ کسے کہتے ہیں۔
- ۲۔ مشہور الہامی کتب کتنی ہیں؟
- ۳۔ آخرت کے کیا معنی ہیں؟
- ۴۔ مقرب فرشتے کتنے ہیں؟

Chapter – 2, Lesson 2, Page 17 (Line No. 6 - 9)

رسالت کی گواہی دینے کا مطلب یہ ہے کہ حضرت محمد صلی اللہ علیہ وآلہ وسلم کو اللہ تعالیٰ کا بندہ اور اس کا آخری نبی مانا جائے اور یہ کہ آپ صلی اللہ علیہ وآلہ وسلم کے بعد قیامت تک کوئی نبی یا رسول نہیں آئے گا۔ آپ صلی اللہ علیہ وآلہ وسلم کی لائی ہوئی ہدایت یعنی قرآن مجید اور آپ صلی اللہ علیہ وآلہ وسلم کی زندگی یعنی آپ صلی اللہ علیہ وآلہ وسلم کی سیرت طیبہ اور سنت ساری دنیا کے انسانوں کی رہنمائی کے لیے قیامت تک کافی ہیں۔

2. In the Textbooks of Islamiyat Grade – 4th, printed for Govt. schools for the Academic Years 2017-18 and 2018-19, the above contents were modified as under and the books supplied to government schools contained the modified text as under:

Chapter – 2, Lesson 1, Page 13 (Line No. 5 - 9)

----- سب سے آخر میں حضرت محمد صلی اللہ علیہ وآلہ وسلم تشریف لائے۔ آپ اللہ تعالیٰ کے آخری نبی اور رسول ہیں۔ آپ کے بعد کوئی نبی آنے والا نہیں ہے۔ قیامت تک آنے والے انسانوں کی رہنمائی کا واحد ذریعہ آپ پر نازل ہونے والی کتاب قرآن مجید اور آپ کی سنت و سیرت ہے۔ ان باتوں پر یقین رکھنا عقیدہ ختم نبوت کہلاتا ہے۔ جو شخص حضرت محمد صلی اللہ علیہ وآلہ وسلم کو آخری پیغمبر نہیں مانتا وہ مسلمان نہیں ہو سکتا۔ اگر کوئی آپ کے بعد نبوت کا دعویٰ کرتا ہے تو وہ جھوٹا اور اسلام سے خارج ہے۔

Chapter – 2, Lesson 1, Page 14 Exercises (Questions 1- 6)

- ۱۔ عقیدہ کے کہتے ہیں۔
- ۲۔ مشہور الہامی کتب کتنی ہیں؟
- ۳۔ آخرت کے کیا معنی ہیں؟
- ۴۔ مقرب فرشتے کتنے ہیں؟
- ۵۔ اللہ تعالیٰ نے انسانوں کو کس چیز سے بنایا ہے؟
- ۶۔ آخری پیغمبر کون ہیں؟ عقیدہ ختم نبوت سے کیا مراد ہے؟

Chapter – 2, Lesson 2, Page 17 (Line No. 6 - 10)

رسالت کی گواہی دینے کا مطلب یہ ہے کہ حضرت محمد صلی اللہ علیہ وآلہ وسلم کو اللہ تعالیٰ کا بندہ اور اس کا آخری نبی مانا جائے اور یہ کہ آپ صلی اللہ علیہ وآلہ وسلم کے بعد قیامت تک کوئی نبی یا رسول نہیں آئے گا۔ ان باتوں پر پختہ یقین رکھنا عقیدہ ختم نبوت کہلاتا ہے۔ نبی کریم صلی اللہ علیہ وآلہ وسلم کی لائی ہوئی ہدایت یعنی قرآن مجید اور آپ صلی اللہ علیہ وآلہ وسلم کی زندگی یعنی آپ صلی اللہ علیہ وآلہ وسلم کی سیرت طیبہ اور سنت ساری دنیا کے انسانوں کی رہنمائی کے لیے قیامت تک کافی ہیں۔

3. While, the Textbook of Islamiyat for Grade-4th printed by M/S "Umme Socio Educational Services, Peshawar" for the Academic Years 2017-18 and 2018-19 for private schools market sale, contents regarding Khatm-e-Nabowat mentioned in Para (2) were found missing.
4. On 24-10-2016, a meeting regarding inclusion of lessons/ contents pertaining to Khatm-e-Nabowat was held under the Chairmanship of Ex-Speaker Khyber Pakhtunkhwa Mr. Asad Qaisar. The Hon'ble Speaker informed the participants that a resolution had been passed unanimously by the Assembly on 07-09-2015 wherein it had been agreed that contents/ topics regarding Khatm-e-Nabowat are to be included/ incorporated in the Textbooks of Khyber Pakhtunkhwa. (Copy of the minutes is annexed as "A").
5. For the purpose, a delegation of Ulma and subject experts met at the Directorate of Curriculum & Teacher Education, Khyber Pakhtunkhwa at Abbottabad on 29-11-2016 and developed draft contents/ topics pertaining to Khatm-e-Nabowat for inclusion in the Textbooks of Islamiyat for Grade-4th.

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relevant Textbooks for the Academic Year 2018-19. (Copy of the minutes is annexed as "B").


6. In the 3rd meeting held on 21-06-2017 at DCTE KP, Abbottabad, the final draft was approved by the committee and later on shared by the DCTE KP with KP Textbook Board for proper incorporation in the Textbooks from G-5 to G-12. The same contents were incorporated in the relevant Textbooks for the Academic Year 2018-19 and onward. (Copies annexed as "C").

It is important to mention here that these approved recommendations were for the Islamiyat Textbooks for Grades 5th, 7th, 8th, 9th, 10th, 11th & 12th. Accordingly the recommendations were incorporated in the Textbooks of the above grades printed for Govt. Schools for the Academic Year 2018-19 and 2019-20.

7. Initially the text/materials pertaining to Khatm-e-Nabowat were incorporated in the Textbooks of Islamiyat, both in Urdu & Pashto versions, for Grade – 4th by Mr. Abdur Rashid, the Ex-Subject Specialist (Islamiyat) of KP Textbook Board, which were printed for the Government Schools for the Academic Year 2017-18 under his supervision. The same book was also printed for the Academic Year 2018-19 accordingly under the supervision of his successor i.e. Mr. Izaz Ullah, SS (Islamiyat) KP TBB. It is important to mention here that the text/materials pertaining to Khatm-e-Nabowat were not reflected in the Textbook of Islamiyat printed for private schools by the publishers for the Academic Years 2017-18 & 2018-19.
8. On the recommendations of Mr. Izaz Ullah, SS (Islamiyat), the Textbook of Islamiyat for Grade – 4th (Urdu & Pashto versions) was sent to the DCTE KP, Abbottabad for re-review in order to add the Students Learning Outcomes (SLOs) in the books. The books were re-reviewed by the committee comprising the following experts at DCTE, KP Abbottabad with a desk officer from KP Textbook Board on 7-8 Nov. 2018 (Urdu version) and 12-14 Dec. 2018 (Pashto version).
- Prof. Dr. Mufti Abdul Wahab, Vice Principal GPGC No. 1, Abbottabad
 - Qari Abdul Shakoor, Senior Teacher (Islamiyat), GHS Jhangi Abbottabad
 - Hafiz Muhammad Nawaz Abbassi, Desk Officer DCTE, Abbottabad
 - Mr. Abdur Rahim, Islamiyat Teacher, GHS Meeran Battagram
 - Mr. Izaz Ullah, SS (Islamiyat), KP Textbook Board.

It is important to mention here that Mr. Izaz Ullah SS (Islamiyat) KP TBB has provided computer printed Islamiyat Book of G-4 of Academic Year 2014-15 to DCTE for review instead of modified copy of Academic Year 2017-18. Therefore, the additional text pertaining to Khatm-e-Nabowat incorporated in the books for the Academic Years 2017-18 and 2018-19, got missing in the textbooks printed and supplied to the Government Schools for the current Academic Year 2019-20.

Furthermore, the Pashto version for the Academic Year 2018-19 containing the relevant text of Khatm-e-Nabowat, was reviewed by the Review Committee of DCTE, Abbottabad with a desk officer Mr. Izaz Ullah SS (Islamiyat) KP TBB. But when the reviewed book (Pashto Version) was printed for the Academic Year 2019-20, it did not


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Elementary & Secondary Education
Department, Khyber Pakhtunkhwa

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contain the Khatm-e-Nabowat relevant text, in spite of the fact that Mr. Izaz Ullah SS (Islamiyat) KP TBB furnished a certificate that the book is free from all sorts of error and the recommendations of the review committee has been incorporated in its true letter and spirit (Copies of the minutes are annexed as "D&E").

(B) PROCEEDINGS

(a) STATEMENT OF MR. ABDUR RASHID EX- SS (ISLAMIYAT) KP TBB:

Mr. Abdur Rashid stated that he had edited the textual material in the Textbook of Islamiyat of G-4 pertaining to Khatm-e-Nabowat without the approval of competent authority in the KP TBB and without the NOC of DCTE KP, Abbottabad, for the Academic Year 2017-18. He stated that approval of the competent authority was not required as it was just editing of the existing content. Furthermore, he had not communicated the additions and modifications to the publisher (M/S Ummee Socio Educational Services, Peshawar) for incorporation in the soft version of the Textbook inadvertently, that's why, the same additions and modification were not reflected in the Islamiyat Text Book for G-4 for the Academic Year 2017-18 and 2018-19 for private schools/market sale. (Copy of his statement is annexed "F")

(b) STATEMENT OF MS. FARZANA MAROOF MD OF M/S UMMEE PUBLISHER:

Miss Farzana Maroof MD of M/S Ummee Publisher also stated in her statement that Mr. Abdur Rashid Ex-Subject Specialist (Islamiyat) had not intimated to her firm about the changes pertaining to Khatm-e-Nabowat, made by him in the Textbook of Islamiyat for G-4 in the Academic Year 2017-18 the same text was, therefore, not incorporated in the soft version of the book. (Copy of her statement is annexed as "G"). When asked that it was not your responsibility to get proof reading of the book before taking to the market?, she replied that Yes the pre-press was forwarded to KP TBB for review and approval. After getting approval of KP TBB, E&P Branch issued an error free letter and ask the publisher to make the positives on the approved manuscript and supply to KP TBB at the earliest. So, the publisher (Ummee) made the positives and handed over to KP TBB for the Academic Year 2019-20.

(c) STATEMENT OF MR. IZAZ ULLAH SS (ISLAMIYAT) KP TBB

Mr. Izaz Ullah Ex-Subject Specialist (Islamiyat) stated that the book was re-reviewed in 2018 in order to incorporate Student Learning Outcomes (SLOs) in it for which approval was obtained on the file. He further stated that instead of book/manuscript, the publisher concerned sent pages for the purpose of review. Although he was reluctant to conduct review on pages but Mr. Saeed-ur-Rahman Member Textbook Board and Mr. Zulfiqar Khan Additional Director DCTE insisted upon him to conduct the review at the earliest. Furthermore, according to him DCTE provided old versions of the books instead of latest printed versions which reflects professional inefficiency. He also stated that the owner M/S Ummee Socio Educational Services (Publisher) did not show cooperative behavior while reviewing the books. He added that the re-review of the book was conducted on the basis of pages in hurry.

Section of Training
Elementary and Secondary Education
Government of Khyber Pakhtunkhwa

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In the context of removing material pertaining to Khatm-e-Nabowat from the book, he stated that neither he had been consulted nor his opinion/approval were sorted out. According to him the publisher might have not paid attention to this aspect while making positive from the soft version. He has also admitted that complete and through checking of thirty-four textbooks relating to his desk within a short time was not possible. Responding to the question he stated that his concentration was focused on the incorporation of SLOs during the review and after checking the printed books. (Copy of his statement is annexed as "H").

(d) STATEMENT OF MR. SAEED-UR-REHMAN, MEMBER (E&P), KP TEXTBOOK BOARD:

- Mr. Saeed-ur-Rehman, Member (E&P), KP Textbook Board stated in his statement that "as per laid down procedure, the review committee should have reviewed the printed textbooks for the Academic Year 2018-19. But the committee re-reviewed the computer copy of the textbooks". When asked regarding provision of copy for review to DCTE KP, whether it was 2014-15 or modified copy of 2017-18 for review, he replied that it was the responsibility of the S.S Islamiyat of KP TBB to provide correct and updated copy to DCTE KP. He further stated that the Subject Specialist (Islamiyat) KP TBB has provided error free certificate for the purpose and copy of the re-reviewed textbooks was submitted to the DCTE, Abbottabad along with a covering letter No. E&P/66329 dated 26-11-2018 for approval and issuance of NOC. (Copy of his statement is annexed as - I). When asked that proof reading of the draft copy was ensured, he again replied that it was the responsibility of the concerned S.S Islamiyat of KP TBB.

(C) FINDINGS:

- i. Mr. Abdur Rashid Ex-SS (Islamiyat) KP TBB now Principal GHS Tarnab Charsadda had edited the textual material in the Textbook of Islamiyat of G-4 pertaining to Khatm-e-Nabowat without the approval of the competent authority in the KP TBB and without the approval /NOC of the DCTE KP, Abbottabad and prior to the recommendations of the Ulma Committee circulated vide letter of dated 23-06-2017. And the same have been also not communicated to the publisher; this act of Mr. Abdur Rashid Ex-SS (Islamiyat) KP TBB is tantamount to inefficiency and misconduct on one side and on the other side he created an embarrassing situation for KP TBB, E&SE Department and the KP Provincial Government before the general public. (Section General Training) Elementary & Secondary Education Department, Khyber Pakhtunkhwa
- ii. According to the statement and hearing of Mr. Izaz Ullah Ex-SS (Islamiyat) KP TBB, the review of Islamiyat Books Grade-4 was carried out on pages provided by the publisher. However the record reveals and was shown to him during the hearing that review on the Urdu version was carried out on computer print manuscript of the book (duly signed by him along-with other members of the review committee) and review on the Pashto version was also conducted on the printed book signed by him and other members of the committee. Therefore his statement is baseless and is not based on facts.

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Mr. Izaz Ullah and other members of the review committee were duty bound to ensure that the reviewing books/ manuscripts contain the contents available in the printed textbook of the preceding Academic Year i.e. 2018-19. The record shows that manuscript of the Urdu version was copy of the books printed in the Academic Year 2015-16, which did not contain the texts pertaining to Khatm-e-Nabowat.

- iii. Mr. Izaz Ullah SS (Islamiyat) KP TBB now at the disposal of E&SE Department had provided computer printed Islamiyat Book of G-4 of Academic Year 2014-15 original version to DCTE KP Abbottabad for review instead of modified copy of Academic Year 2017-18. Therefore, the additional text pertaining to Khatm-e-Nabowat incorporated in the books for the Academic Years 2017-18 and 2018-19, got missing in these textbooks printed and supplied to the government schools for the current Academic Year 2019-20 without approval/NOC of the DCTE being competent authority.
- iv. The Pashto version for the Academic Year 2018-19, containing the relevant modified text of Khatm-e-Nabowat, was reviewed by the Review Committee of DCTE, Abbottabad with a desk officer Mr. Izaz Ullah SS (Islamiyat) KP TBB. But when the reviewed book (Pashto Version) was printed for the Academic Year 2019-20, it was found that the Khatm-e-Nabowat text is missing, in spite of the fact that Mr. Izaz Ullah SS (Islamiyat) KP TBB furnished a certificate that the book is free from all sorts of error and the recommendations of the review committee has been incorporated in its true letter and spirit.
- v. Mr. Saeed-ur-Rahman, Member (E&P), KP Textbook Board has also not fulfilled his official responsibility and the matters were left at the mercy of concerned S.S (Islamiyat) KP TBB only which should not be the case. And he must ensure that the book is going for printing in correct form.
- vi. At the same time in the Academic Year 2017-18 and 2018-19, two versions of G-4 Islamiyat were in the field, but the concerned in the Textbook Board did not take cognizance of this issue due to negligence and they did not compare with the publisher's books in the market.
- vii. M/S Ummee Socio Educational Services, Peshawar was also responsible in a sense that it did not do the proofreading before taking the manuscript through the KP TBB to the Review Committee and also the final version of the book before and after the printing.
- viii. The Review Committee at the DCTE with a desk officer Mr. Izaz Ullah SS from KP TBB has reviewed the Urdu and Pashto version of Islamiyat Book for G-4. However it is pertinent to mention that the relevant content was available in the Pashto version while the same was missing in the Urdu version before the re-review Committee. But when the book came to the field even the text pertaining to Khatm-e-Nabowat in the Pashto version was missing.

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The Enquiry Committee, after examining the record, relevant textbooks, statements and personal hearings, has reached the conclusions that missing/ deletion/ non-printing of the textual materials pertaining to Khatm-e-Nabowat was not a deliberate act and attempt, but it was done inadvertently, because the manuscript was reviewed keeping in view the Grade - 4th Islamiyat books for the Academic Years 2013-14, 2014-15, 2015-16 and 2016-17) and accordingly printed for the Academic Year 2019-20, instead of the Grade- 4 Islamiyat books printed for the Academic Year

added text pertaining to Khatm-e-Nabowat)

(12)

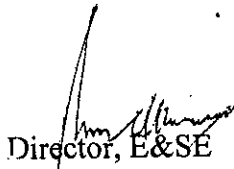
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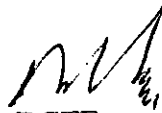
However, the inefficiency, negligence and irresponsible attitude on the part of concerned officers/ officials/ persons cannot be overlooked and spared as the matter is of very serious nature.

(D) RECOMENDATIONS:

- a. The printed books of Islamiat Grade - 4th both Urdu and Pashto version may be immediately banned and recalled from the schools / students.
- b. Fresh and corrected copies of the book (Urdu & Pashto versions) may be printed and distributed after fulfilling all codal formalities.
- c. All officers/officials at fault may be dealt strictly in accordance with the E&D Rules 2011.



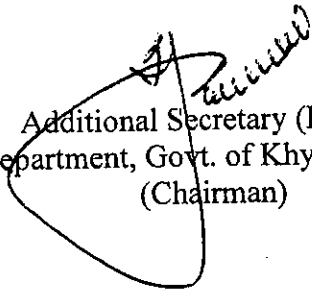
Director, E&SE
Khyber Pakhtunkhwa, Peshawar
(Member)



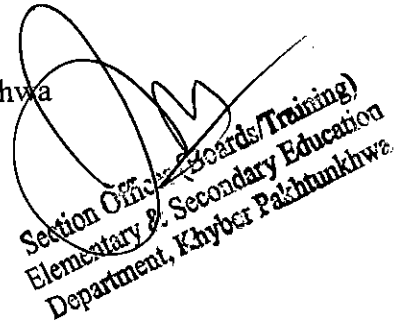
Director DCTE,
Khyber Pakhtunkhwa,
Abbottabad (Member)



Secretary Khyber Pakhtunkhwa
Textbook Board Peshawar
(Member)



Additional Secretary (Estab.),
E&SE Department, Govt. of Khyber Pakhtunkhwa
(Chairman)



Section Officer (Boards/Training)
Elementary & Secondary Education
Department, Khyber Pakhtunkhwa

(B)

DISCIPLINARY ACTION

I, Muhammad Salim, Chief Secretary, Khyber Pakhtunkhwa as Competent Authority, am of the opinion that Mr. Saeed-ur-Rehman (BS-19), Member Editorial & Production, Khyber Pakhtunkhwa Textbook Board Peshawar has rendered himself liable to be proceeded against, as he committed the following acts/omissions, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS


- i. He, being the incharge Member Editorial & Production, Khyber Pakhtunkhwa Textbook Board Peshawar, should have strict supervision of the textbook reviewed by the subject specialist and Review Committee.
- ii. His loose control over your team caused the current issue and it seems that Subject Specialist reviewed and recommended the books as free of any error, on his sweet will without any supervision by the Member.
- iii. As Member Editorial & Production, Khyber Pakhtunkhwa Textbook Board Peshawar, it was his duty to ensure that the book is error-free and having all the relevant contents before the same was printed.
- iv. The above negligence on his part caused huge financial loss and precious time of the student is lost by re-printing and re-distribution to schools.

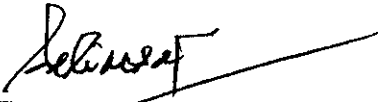
2- For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer/ inquiry committee, consisting of the following, is constituted under Rule 10(1)(a) of the ibid Rules:

- i. Mr. Khaista Rahmat (PES 39 BS-20) PD CLR-II
- ii. Mr. Sharif Gul, Principal (BS-19) GHS NO.2 Pesh Cantt.

3- The inquiry officer/ inquiry committee shall, in accordance with the provisions of the ibid Rules, provide reasonable opportunity of hearing to the accused, record its findings and make within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4- The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer/ inquiry committee.


Section Officer (Boards/Training)
Elementary & Secondary Education
Department, Khyber Pakhtunkhwa


(MUHAMMAD SALIM)
CHIEF SECRETARY KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY

Mr. Saeed-ur-Rehman (BS-19) (Member Editorial & Production) Khyber Pakhtunkhwa Textbook Board Peshawar

(14)
CHARGE SHEET

I, Muhammad Salim, Chief Secretary, Khyber Pakhtunkhwa as Competent Authority, hereby charge you Mr. Saeed-ur-Rehman (BS-19) Member Editorial & Production, Khyber Pakhtunkhwa Textbook Board as follows:-

That you, while posted as Subject Specialist Khyber Pakhtunkhwa Textbook Board Peshawar committed the following irregularities:

- i. You, being the incharge Member Editorial & Production, Branch of KP Textbook Board, should have strict supervision of the textbook reviewed by the subject specialist and Review Committee.
 - ii. Your loose control over your team caused the current issue and it seems that Subject Specialist reviewed and recommended the books as free of any error, on his sweet will without any supervision by the Member.
 - iii. As Member Editorial & Production, Khyber Pakhtunkhwa Textbook Board, it was your duty to ensure that the book is error-free and having all the relevant contents before the same was printed.
 - iv. The above negligence on your part caused huge financial loss and precious time of the student is lost by re-printing and re-distribution to schools.
- 2- By reason of the above, you appear to be guilty of misconduct under Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.
- 3- You are, therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer/ inquiry committee, as the case may be.
- 4- Your written defense, if any, should reach the inquiry officer/ inquiry committee within specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
- 5- Intimate whether you desire to be heard in person.
- 6- A Statement of Allegations is enclosed.

S. Salim
(MUHAMMAD SALIM)
CHIEF SECRETARY KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY

Mr. Saeed-ur-Rehman (BS-19) (Member Editorial & Production) Khyber Pakhtunkhwa Textbook Board Peshawar

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Department, Khyber Pakhtunkhwa