

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

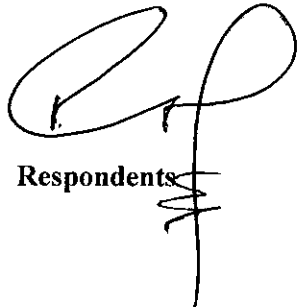
Appeal No. 2316 of 2023

Saifullah Appellant

Versus

Govt of Khyber Pakhtunkhwa through Secretary & Others Respondents

Index		
S.No	Particulars	Page No.
1	Parawise Comments	1-2
2	Affidavit	3
3	Annex-I; Affidavit of Appellant's Father	4
4	Annex-II; Attendance Record	5-9
5	Annex-III; Office Order of Appellate Authority	10
6	Annex-IV; KP E&D Rules 2011	11-14
7	Annex-V; Letters issued to Appellant	15-24
8	Annex-VI; Show cause Notice Published	25
9	Annex-VII; Personal Hearing	26-29


Respondents

①

BEFORE THE COURT OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 2316 of 2023

Saifullah..... Appellant

Versus

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

Joint Parawise Comments on Behalf of Respondents

RESPECTFULLY SHEWETH:

**Khyber Pakhtunkhwa
Service Tribunal**
Diary No. 10875
Dated 30/11/24

Preliminary Objections:

1. That the appellant has got no cause of action/ locus standi to file the instant appeal.
2. That the appellant is estopped by his own conduct to file the instant appeal.
3. That the appellant has not come to the tribunal with clean hands, therefore the instant appeal is liable to be dismissed.
4. That the appellant has concealed material facts from this Honorable Tribunal because he remained willfully absent from duty for about one and half month.


PARA WISE COMMENTS

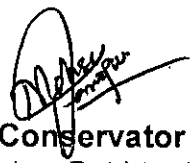
1. Pertains to record, hence needs no comments.
2. Incorrect; as clear from his own statement in para 3 that he remained willfully absent from duty for a period of more than one and half month.
3. Incorrect. The father of appellant himself stated on affidavit (**Annex-I**) that appellant remained willfully absent from duty for several weeks on ~~many~~ occasion and did not bother to inform the reporting officer or Director Peshawar Zoo. Consequently, upon his prolonged willful absence (**Annex-II**) and failure to resume his official duty, the competent authority imposed a major penalty of "removal from service" vide office order No.03 dated: 21-07-2023, under Rule-9 of the Khyber Pakhtunkhwa (Efficiency and Discipline) Rules, 2011, after completion of laid down procedures.
4. Incorrect, the departmental appeal was rejected by the appellate authority as per procedure under the rules and regulations having no force (**Annex-III**).
5. Incorrect, as explained in Para-3 & 4 above.
6. Incorrect, the major penalty of removal from service was imposed by the competent authority according to law and rules as explained above, therefore the instant service appeal may be dismissed on the following grounds: -


GROUND

- A. Incorrect; as explained above office orders No.03 dated 21-07-2023(appointing/ competent authority) and No.31 dated 06-10-2023 (appellate authority) against the appellant, are according to the relevant rules of Efficiency & Disciplinary Rules, 2011(**Annex-IV**).
- B. Incorrect, the disciplinary action against the appellant was purely based on his prolonged willful absence and was dealt under Rule-9 of Khyber Pakhtunkhwa (Efficiency and Discipline) Rules 2011.
- C. Incorrect, as already explained in para-3&4 of the facts and para-A&B of the grounds.
- D. As the appellant was dealt as per provision of relevant Rule 9 of (Efficiency& Discipline) Rule 2011 and therefore procedure of rule ibid was followed.
- E. Incorrect. As special procedure under relevant Rule-9 has been followed in this case, therefore, charge sheet and statement of allegations were not served upon appellant. However, letters on his home address (**Annex-V**) and showcase notice published in the daily Mashriq newspaper dated 29-06-2023(**Annex-VI**).
- F. Incorrect. As already explained in above paras.
- G. Incorrect.
- H. Incorrect, as explained above.
- I. Incorrect, the appellate authority has provided opportunity of personal hearing (**Annex-VII**) by the appellant authority under the relevant rules.
- J. Incorrect. As explained above.
- K. The appellant has no grounds in his favor and the appeal is liable to be dismissed.

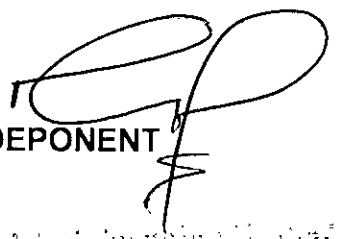
It is therefore most humbly prayed that on acceptance of instant parawise comments, the service appeal under consideration may kindly be dismissed with cost.


Secretary
Climate Change, Forestry,
Environment & Wildlife Department
Khyber Pakhtunkhwa
(Respondent No.1)


Chief Conservator Wildlife
Khyber Pakhtunkhwa
Wildlife Department
(Respondent No.2)


**Director/Conservator
Wildlife**
Peshawar Zoo
(Respondent No.3)

Affidavit: It is verified on oath that all the contents of the instant suit are true and correct to the best of my knowledge and belief and nothing is concealed or withheld from this Honorable Court.


DEPONENT
Admitted to practice as a lawyer
in the High Court of Khyber Pakhtunkhwa
at Peshawar on 10/06/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 2316 of 2023

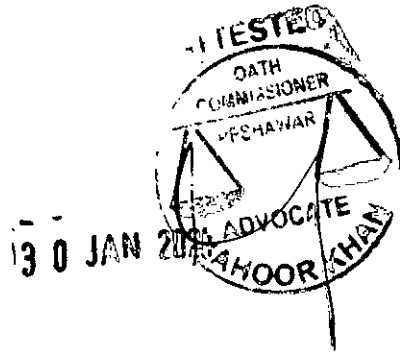
Saifullah Appellant

Versus

Govt of Khyber Pakhtunkhwa through Secretary & Others Respondents

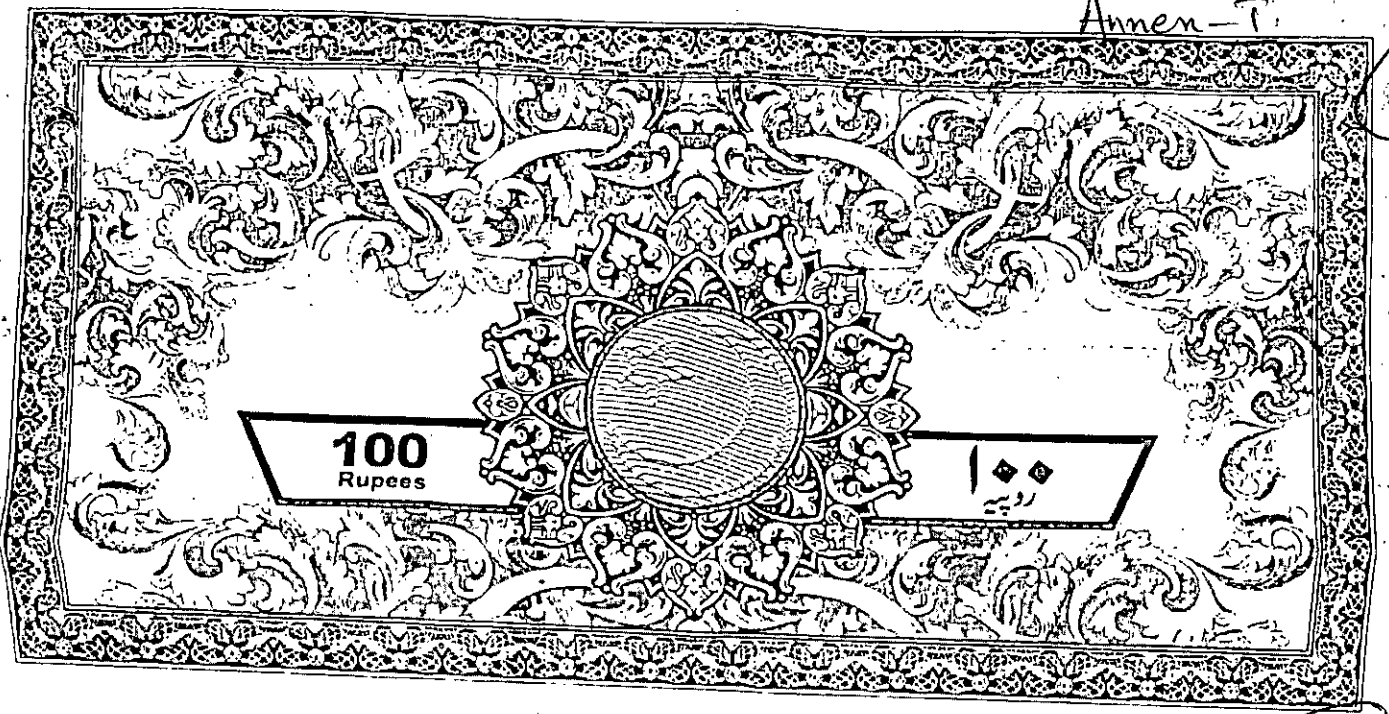
AFFIDAVIT

I, Syed Muhammad Ali S/o Syed Muhammad Akram (Director/ Conservator Wildlife Peshawar Zoo, Peshawar) do hereby solemnly affirm and declare on oath that the contents of the accompanying **Parawise Comments** are true and correct to the best of knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

CNIC: 15309-1003476-9
Cell No: 0332-9354053



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Administrative Officer
Peshawar Wildlife Zoo

یہ تصدیق کی جاتی ہے کہ میں، سعید علی ولد بوجہ، سیف اللہ کے والد ہوں، سیف اللہ پشاور چڑیا گھر کا مستقل ملازم، 2019 سے مالی کے طور پر کام کر رہا ہے، بغیر کسی درخواست کے گزشتہ کئی ہفتوں سے سرکاری ڈیوٹی سے جان بوجھ کر غیر حاضر رہا ہے۔ سیف اللہ نے نہ تو متعلقہ بیٹ وائلڈ لائف واچر کو اطلاع دی اور نہ ہی رپورٹنگ آفیسر کو درخواست دی ہے۔ مزید یہ کہ سیف اللہ بغیر کسی درخواست کے متعدد بار غیر حاضر رہے۔ چڑیا گھر انتظامیہ کی رپورٹ کے مطابق سیف اللہ مالی کی کارکردگی خراب ہے، کئی بار ڈیوٹی میں غفلت کا انکشاف ہوا ہے۔

میں، سیف اللہ کے والد، اس بات کی تصدیق کی کہ سیف اللہ آج سے اپنی سرکاری ڈیوٹی پر باقاعدگی سے کام کریں گے، وہ اپنی کارکردگی کو مزید بہتر بنائیں گے اور انہیں تفویض کردہ کاموں کو موثر اور بروقت مکمل کریں گے۔ میری چڑیا گھر انتظامیہ سے درخواست ہے کہ وہ سیف اللہ کو پشاور چڑیا گھر میں اپنی سرکاری ڈیوٹی میں شامل ہونے کا آخری موقع فراہم کرے۔ اپنی ڈیوٹی انجام دینے میں ناکامی اور مستقبل میں جان بوجھ کر غیر حاضری کی صورت میں سیف اللہ مالی کے خلاف بہترین عوامی مفادات میں خیر پختہ خواہ کارکردگی اور نظم ضبط کے قواعد 2011 کے تحت سخت

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گواہی 3
17301-1568323-7

تاریخی کارروائی کی جاسکتی ہے۔

173011568323-7

173012142838-1

M. G. ... 13-82

17301 1272379

District Comptroller of Accounts
2 11 1973

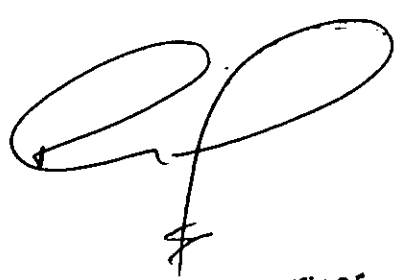
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RECEIVED
DISTRICT COMPTROLLER OF ACCOUNTS
MAY 11 1973



JANUARY, 2023					
No.	Name	Date/Time	Check-in	Check-out	Remarks
21	Saifullah	Sunday, January 01, 2023	No Check-in	6:49:18 PM	Doubtful
21	Saifullah	Monday, January 02, 2023	No Check-in	6:09:24 PM	Doubtful
21	Saifullah	Tuesday, January 03, 2023	No Check-in	6:07:29 PM	Doubtful
21	Saifullah	Wednesday, January 04, 2023	OFF		
21	Saifullah	Thursday, January 05, 2023	OFF		
21	Saifullah	Friday, January 06, 2023	No Check-in	6:09:35 PM	Doubtful
21	Saifullah	Saturday, January 07, 2023	No Check-in	5:17:40 PM	Doubtful
21	Saifullah	Sunday, January 08, 2023	No Check-in	6:02:29 PM	Doubtful
21	Saifullah	Monday, January 09, 2023	No Check-in	6:09:05 PM	Doubtful
21	Saifullah	Tuesday, January 10, 2023	8:59:47 AM	5:48:59 PM	
21	Saifullah	Wednesday, January 11, 2023	OFF		
21	Saifullah	Thursday, January 12, 2023	OFF		
21	Saifullah	Friday, January 13, 2023	8:31:43 AM	4:39:52 PM	
21	Saifullah	Saturday, January 14, 2023	8:39:07 AM	6:06:36 PM	
21	Saifullah	Sunday, January 15, 2023	9:01:03 AM	6:37:37 PM	
21	Saifullah	Monday, January 16, 2023	9:55:36 AM	No Check-out	Doubtful
21	Saifullah	Tuesday, January 17, 2023	9:02:32 AM	6:49:05 PM	
21	Saifullah	Wednesday, January 18, 2023	OFF		
21	Saifullah	Thursday, January 19, 2023	OFF		
21	Saifullah	Friday, January 20, 2023	9:22:58 AM	5:31:14 PM	
21	Saifullah	Saturday, January 21, 2023	9:19:45 AM	5:39:21 PM	
21	Saifullah	Sunday, January 22, 2023	9:11:25 AM	6:28:56 PM	
21	Saifullah	Monday, January 23, 2023	9:22:24 AM	6:21:49 PM	
21	Saifullah	Tuesday, January 24, 2023	9:13:16 AM	5:38:43 PM	
21	Saifullah	Wednesday, January 25, 2023	OFF		
21	Saifullah	Thursday, January 26, 2023	OFF		
21	Saifullah	Friday, January 27, 2023	8:40:24 AM	6:02:55 PM	
21	Saifullah	Saturday, January 28, 2023	9:09:25 AM	6:24:13 PM	
21	Saifullah	Sunday, January 29, 2023	9:34:52 AM	No Check-out	Doubtful
21	Saifullah	Monday, January 30, 2023	10:10:06 AM	6:21:03 PM	
21	Saifullah	Tuesday, January 31, 2023	9:54:22 AM	6:24:30 PM	

ABSTRACT

No. of Leaves allowed/Month 8
 No. of leaves availed/Month 8
 No. of Absentees/Month 0


 Administrative Officer
 Peshawar Wildlife Zoo

63

FEBRUARY, 2023

No.	Name	Date/Time	Check-in	Check-out	Remarks
21	Saifullah	Wednesday, February 01, 2023			OFF
21	Saifullah	Thursday, February 02, 2023			
21	Saifullah	Friday, February 03, 2023	9:57:26 AM	6:26:20 PM	
21	Saifullah	Saturday, February 04, 2023			OFF
21	Saifullah	Sunday, February 05, 2023	9:25:36 AM	6:19:43 PM	
21	Saifullah	Monday, February 06, 2023	10:04:18 AM	7:08:45 PM	
21	Saifullah	Tuesday, February 07, 2023			OFF
21	Saifullah	Wednesday, February 08, 2023	10:05:38 AM	6:25:40 PM	
21	Saifullah	Thursday, February 09, 2023			OFF
21	Saifullah	Friday, February 10, 2023	9:42:22 AM	6:44:33 PM	
21	Saifullah	Saturday, February 11, 2023	9:22:42 AM	6:59:57 PM	
21	Saifullah	Sunday, February 12, 2023	9:47:26 AM	6:46:52 PM	
21	Saifullah	Monday, February 13, 2023	10:01:50 AM	7:02:29 PM	
21	Saifullah	Tuesday, February 14, 2023	10:22:57 AM	6:47:02 PM	
21	Saifullah	Wednesday, February 15, 2023	10:17:41 AM	7:05:02 PM	
21	Saifullah	Thursday, February 16, 2023			OFF
21	Saifullah	Friday, February 17, 2023	10:15:51 AM	6:57:35 PM	
21	Saifullah	Saturday, February 18, 2023	9:35:30 AM	6:48:46 PM	
21	Saifullah	Sunday, February 19, 2023	9:40:04 AM	6:12:01 PM	
21	Saifullah	Monday, February 20, 2023	9:52:49 AM	7:00:42 PM	
21	Saifullah	Tuesday, February 21, 2023	9:50:25 AM	No Check-out	Doubtful
21	Saifullah	Wednesday, February 22, 2023			OFF
21	Saifullah	Thursday, February 23, 2023			
21	Saifullah	Friday, February 24, 2023	10:17:19 AM	7:31:41 PM	
21	Saifullah	Saturday, February 25, 2023	10:08:25 AM	7:00:10 PM	
21	Saifullah	Sunday, February 26, 2023	9:18:04 AM	6:13:04 PM	
21	Saifullah	Monday, February 27, 2023	9:42:41 AM	6:51:12 PM	
21	Saifullah	Tuesday, February 28, 2023			ABSENT

ABSTRACT

No. of Leaves allowed/Month 8
 No. of leaves availed/Month 8
 No. of Absentees/Month

Administrative Officer
Poulwar Wildlife Zoo

MARCH, 2023

No.	Name	Date/Time	Check-in	Check-out	Remarks
21	Saifullah	Wednesday, March 01, 2023			
21	Saifullah	Thursday, March 02, 2023			OFF
21	Saifullah	Friday, March 03, 2023	9:29:39 AM	6:57:07 PM	
21	Saifullah	Saturday, March 04, 2023			ABSENT
21	Saifullah	Sunday, March 05, 2023	9:28:18 AM	6:46:37 PM	
21	Saifullah	Monday, March 06, 2023	10:10:33 AM	6:54:17 PM	
21	Saifullah	Tuesday, March 07, 2023			
21	Saifullah	Wednesday, March 08, 2023			OFF
21	Saifullah	Thursday, March 09, 2023	9:49:12 AM	6:39:21 PM	
	Saifullah	Friday, March 10, 2023	No Check-in	7:35:51 PM	Doubtful
21	Saifullah	Saturday, March 11, 2023	9:17:23 AM	7:11:03 PM	
21	Saifullah	Sunday, March 12, 2023	10:25:34 AM	No Check-out	Doubtful
21	Saifullah	Monday, March 13, 2023	9:37:49 AM	No Check-out	Doubtful
21	Saifullah	Tuesday, March 14, 2023	9:54:59 AM	7:25:54 PM	
21	Saifullah	Wednesday, March 15, 2023			
21	Saifullah	Thursday, March 16, 2023			OFF
21	Saifullah	Friday, March 17, 2023	No Check-in	7:22:48 PM	Doubtful
21	Saifullah	Saturday, March 18, 2023	No Check-in	7:33:07 PM	Doubtful
21	Saifullah	Sunday, March 19, 2023	No Check-in	7:04:37 PM	Doubtful
21	Saifullah	Monday, March 20, 2023			ABSENT
21	Saifullah	Tuesday, March 21, 2023	10:34:34 AM	5:47:00 PM	
21	Saifullah	Wednesday, March 22, 2023			
21	Saifullah	Thursday, March 23, 2023			OFF
21	Saifullah	Friday, March 24, 2023			ABSENT
21	Saifullah	Saturday, March 25, 2023	9:31:21 AM	2:51:50 PM	
21	Saifullah	Sunday, March 26, 2023			ABSENT
21	Saifullah	Monday, March 27, 2023			ABSENT
21	Saifullah	Tuesday, March 28, 2023			ABSENT
21	Saifullah	Wednesday, March 29, 2023			
21	Saifullah	Thursday, March 30, 2023			OFF
21	Saifullah	Friday, March 31, 2023			ABSENT

ABSTRACT

No. of Leaves allowed/Month 10
 No. of leaves availed/Month 10,
 No. of Absentees/Month 7



Administrative Officer
 Peshawar Wildlife Zoo
 Peshawar

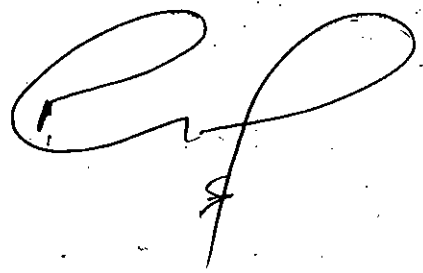
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APRIL, 2023

No.	Name	Date/Time	Check-in	Check-out	Remarks
21	Saifullah	Saturday, April 01, 2023		ABSENT	
21	Saifullah	Sunday, April 02, 2023		ABSENT	
21	Saifullah	Monday, April 03, 2023		ABSENT	
21	Saifullah	Tuesday, April 04, 2023		ABSENT	
21	Saifullah	Wednesday, April 05, 2023		OFF	
21	Saifullah	Thursday, April 06, 2023		ABSENT	
21	Saifullah	Friday, April 07, 2023		ABSENT	
21	Saifullah	Saturday, April 08, 2023		ABSENT	
21	Saifullah	Sunday, April 09, 2023		ABSENT	
21	Saifullah	Monday, April 10, 2023		ABSENT	
21	Saifullah	Tuesday, April 11, 2023		OFF	
21	Saifullah	Wednesday, April 12, 2023		OFF	
21	Saifullah	Thursday, April 13, 2023	9:39:21 AM	No Check-out	Doubtful
21	Saifullah	Friday, April 14, 2023	10:04:45 AM	8:05:35 PM	
21	Saifullah	Saturday, April 15, 2023	9:04:07 AM	4:36:00 PM	
21	Saifullah	Sunday, April 16, 2023	10:57:56 AM	5:07:59 PM	
21	Saifullah	Monday, April 17, 2023	9:57:02 AM	6:28:58 PM	
21	Saifullah	Tuesday, April 18, 2023	10:39:34 AM	3:59:21 PM	
21	Saifullah	Wednesday, April 19, 2023		OFF	
21	Saifullah	Thursday, April 20, 2023		OFF	
21	Saifullah	Friday, April 21, 2023		ABSENT	
21	Saifullah	Saturday, April 22, 2023		ABSENT	
21	Saifullah	Sunday, April 23, 2023		ABSENT	
21	Saifullah	Monday, April 24, 2023	9:24:47 AM	7:57:44 PM	
21	Saifullah	Tuesday, April 25, 2023	10:04:54 AM	7:01:02 PM	
21	Saifullah	Wednesday, April 26, 2023		OFF	
21	Saifullah	Thursday, April 27, 2023	8:35:11 AM	8:04:48 PM	
21	Saifullah	Friday, April 28, 2023		OFF	
21	Saifullah	Saturday, April 29, 2023	9:55:20 AM	No Check-out	Doubtful
21	Saifullah	Sunday, April 30, 2023	9:16:41 AM	9:18:04 AM	

ABSTRACT

No. of Leaves allowed/Month 8
 No. of leaves availed/Month 8
 No. of Absentees/Month 11

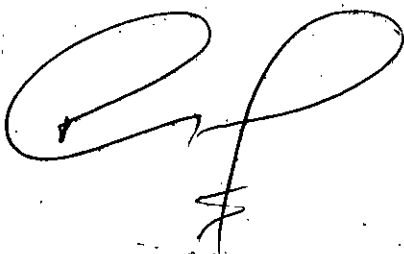


**Administrative Officer
 Peshawar Wildlife Zoo
 Peshawar**

MAY, 2023					
No.	Name	Date/Time	Check-in	Check-out	Remarks
21	Saifullah	Monday, May 01, 2023		ABSENT	
21	Saifullah	Tuesday, May 02, 2023	10:19:46 AM	No Check-out	Doubtful
21	Saifullah	Wednesday, May 03, 2023		ON	
21	Saifullah	Thursday, May 04, 2023	10:49:24 AM	No Check-out	Doubtful
21	Saifullah	Friday, May 05, 2023		OFF	
21	Saifullah	Saturday, May 06, 2023		ABSENT	
21	Saifullah	Sunday, May 07, 2023	10:08:15 AM	6:56:17 PM	
21	Saifullah	Monday, May 08, 2023	7:40:21 AM	No Check-out	Doubtful
21	Saifullah	Tuesday, May 09, 2023	9:28:09 AM	7:48:07 PM	
21	Saifullah	Wednesday, May 10, 2023	9:29:36 AM	7:20:04 PM	
21	Saifullah	Thursday, May 11, 2023			
21	Saifullah	Friday, May 12, 2023			
21	Saifullah	Saturday, May 13, 2023		ABSENT	
21	Saifullah	Sunday, May 14, 2023	8:06:12 AM	7:46:52 PM	
21	Saifullah	Monday, May 15, 2023		ABSENT	
21	Saifullah	Tuesday, May 16, 2023	9:53:40 AM	No Check-out	Doubtful

ABSTRACT

No. of Leaves allowed/Month 8
No. of leaves availed/Month 4
No. of Absentees/Month 4



OFFICE ORDER NO. 31 DATED PESHAWAR THE 06/10/2023 BY
Dr. MOHSIN FAROOQUE CHIEF CONSERVATOR WILDLIFE KHYBER PAKHTUNKHWA
PESHAWAR

Under consideration is an appeal dated 02-08-2023 preferred by Mr. Saif Ullah Ex-Mali of Peshawar Zoo. The appellant was proceeded under Rule-9 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011 by imposing the major penalty of "Removal from Service" through Director/Conservator Wildlife Peshawar Zoo, Peshawar vide office order No.03, dated 21-07-2023 for the charges of willful absence from duty.

The appeal of Mr. Saif Ullah Ex-Mali was sent to Director/Conservator Wildlife Peshawar Zoo vide this office letter No.1047/WL(E), dated 03-08-2023 for comments. Director/Conservator Wildlife Peshawar Zoo furnished his comments vide letter No 476/P-Zoo, dated 29-08-2023, whereby he concluded as under:

"He never performed his duty satisfactorily. He habitually remained absent from duty. He was warned many times to perform his duty strictly but in vain. He was called many explanations from Admn: Officer Peshawar Zoo and 15 days notice published in the newspaper for joining his duty before issuing of termination order but he did not respond. Resultantly, he was terminated from government service vide office order No.03, dated 21-07-2023 under Rule-09 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011".

On receipt of the above comments, Mr. Saif Ullah Ex-Mali was given an opportunity of personal hearing on 28-09-2023 for explaining his position. He was given a questionnaire. However, it was noted that he intentionally responded every question with false statement. It is evident from the record that he was admitted to a Drugs Rehabilitation Centre for being engaged in the use of illegal drugs including ICE during his employment in Peshawar Zoo. Thus for maintaining the integrity and safety of Peshawar Zoo and wellbeing of visitors and other stakeholders, his retention in Peshawar Zoo is harmful. Thus, I hereby reject his appeal for re-instatement in service on the following grounds that:

- i. the Wildlife Department has been formally declared as Wildlife Force and there is no possibility to keep such illegal drugs addict near the para professional officials, Animal Keepers and other support staff,
- ii. he was recruited in Peshawar Zoo where thousands of visitors especially children and ladies come on daily basis. His illegal drugs addiction habit may compromise the safety and wellbeing of Peshawar Zoo visitors especially minors,
- iii. his presence in these circumstances poses significant risks to the safety and productivity of the zoo assets and different stakeholders of Peshawar Zoo including contractors, service providers, security staff etc.

Based on the above factual position and exercising the powers under Rule-17 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the undersigned reject the appeal of Mr. Saif Ullah Ex-Mali (BPS-03), of Peshawar Zoo and uphold the major penalty of "Removal from Service" upon him from the date he has been awarded penalty.

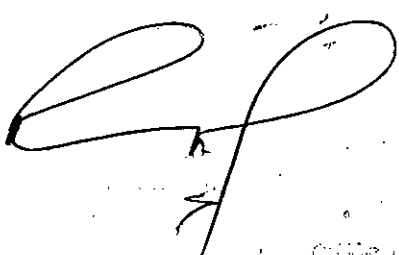
(Dr. Mohsin Farooque)
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

No. 2783-84/WLB-X-08

Copy for information and necessary action forwarded to the

1. Director/Conservator Wildlife Peshawar Zoo with reference to letter No 476/P-Zoo, dated 29-08-2023
2. Mr. Saif Ullah Ex-Mali of Peshawar Zoo with reference to his appeal dated 02-08-2023


06/10/23
Chief Conservator Wildlife



Chief Conservator Wildlife
Peshawar

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ESTABLISHMENT AND ADMINISTRATION DEPARTMENT.

NOTIFICATION

Peshawar dated the 16th September, 2011.

No.SO(REG-VI)E&AD/2-6/2010.-In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Chief Minister of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:

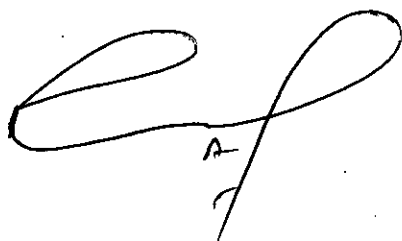
1. **Short title, application and commencement.**---(1) These rules may be called the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

(2) These shall apply to every person who is a member of the civil service of the Province or is the holder of a civil post in connection with the affairs of the Province and shall also apply to or in relation to a person in temporary employment in the civil service or post in connection with affairs of the Province.

(3) These shall come into force at once.

2. **Definitions.**---(1) In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them, that is to say-

- (a) "accused" means a person in Government service against whom action is initiated under these rules;
- (b) "appellate authority" means the authority next above the competent authority to which an appeal lies against the orders of the competent authority;
- (c) "appointing authority" means an authority declared or notified as such by an order of Government under the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) and the rules made thereunder or an authority as notified under the specific laws/rules of Government;
- (d) "charges" means allegations framed against the accused pertaining to acts of omission or commission cognizable under these rules;



Administrative Officer
Peshawar Office
16/9/2011

- (b) proceed against the Government servant under rule 5, where he has been convicted of charges other than corruption or moral turpitude.

9. **Procedure in case of wilful absence.**---Notwithstanding anything to the contrary contained in these rules, in case of wilful absence from duty by a Government servant for seven or more days, a notice shall be issued by the competent authority through registered acknowledgement on his home address directing him to resume duty within fifteen days of issuance of the notice. If the same is received back as undelivered or no response is received from the absentee within stipulated time, a notice shall be published in at least two leading newspapers directing him to resume duty within fifteen days of the publication of that notice, failing which an ex-parte decision shall be taken against the absentee. On expiry of the stipulated period given in the notice, major penalty of removal from service may be imposed upon such Government servant.

10. **Procedure to be followed by competent authority where inquiry is necessary.**---(1) If the competent authority decides that it is necessary to hold an inquiry against the accused under rule 5, it shall pass an order of inquiry in writing, which shall include-

- (a) appointment of an inquiry officer or an inquiry committee, provided that the inquiry officer or the inquiry committee, as the case may be, shall be of a rank senior to the accused and where two or more accused are proceeded against jointly, the inquiry officer or the convener of the inquiry committee shall be of a rank senior to the senior most accused;
- (b) the grounds for proceeding, clearly specifying the charges along with apportionment of responsibility;
- (c) appointment of the departmental representative by designation; and
- (d) direction to the accused to submit written defense to the inquiry officer or the inquiry committee, as the case may be, within reasonable time which shall not be less than seven days and more than fifteen days of the date of receipt of orders.

(2) The record of the case and the list of witnesses, if any, shall be communicated to the inquiry officer or the inquiry committee, as the case may be, along with the orders of inquiry.

(3) In a case where preliminary or fact finding inquiry was conducted, and the competent authority decides to hold formal inquiry, the inquiry officer or the inquiry committee for the purpose of conducting formal inquiry shall be different from the inquiry officer or the inquiry committee which conducted the preliminary inquiry.



NOTIFICATION

Dated Peshawar the 16th January, 2023

No. SO (Policies) E & AD/2-6/2022. In exercise of the powers conferred by Section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the following further amendment shall be made, namely:

AMENDMENTS

1. In rule 4, in sub rule (1), in clause (b), in sub-clause (i),

(i) for the first proviso, the following shall be substituted, namely:

"Provided that on restoration to original pay scale or post, the penalized Government servant shall be placed below the erstwhile juniors promoted to higher post during subsistence of the period of penalty."; and

(ii) in the second proviso, the semi-colon, appearing at the end, shall be replaced by a colon and thereafter the following new proviso shall be added, namely:

"Provided also that this penalty shall not be imposed upon the Government servant, who has been appointed against the post by initial recruitment."

2. In rule 6, after sub-rule (1), the following proviso, shall be added, namely:

"Provided that in cases where the Chief Minister or Chief Secretary is the competent authority, the Administrative Secretary may suspend the Government servant and submit charge sheet and statement of allegations, forthwith, to the competent authority for signature and initiation of disciplinary proceedings, in accordance with these rules."

For rule-9, the following shall be substituted, namely:

"9. Procedure in case of willful absence— Notwithstanding anything to the contrary contained in these rules, in case of willful absence from duty by a Government servant for seven or more days, a notice shall be issued by the Administrative Secretary in case the competent authority is Chief Minister or Chief Secretary and in all other cases by the competent authority concerned, through registered acknowledgement on his home address directing him to resume duty within fifteen (15) days of issuance of the notice. If the same is received back as undelivered or no response is received from such Government servant, within stipulated time, a notice shall be published in at least two leading newspapers, directing him to resume duty within fifteen (15) days of the publication of the notice, failing which an ex-parte decision shall be taken by the competent authority against him. On expiry of the stipulated period given in the notice, major penalty of removal from service may be imposed upon such Government servant by the competent authority":

"Provided that upon publication of the notice in the newspaper, pay of such Government servant shall be stopped".

Administrative Officer
Peshawar Wildlife Zoo
Peshawar

4. In rule-11, in sub-rule (7),-

- (i) the full stop, appearing at the end, shall be replaced by a colon and thereafter the following proviso shall be added, namely:

"Provided that the Inquiry Officer, Inquiry Committee or hearing officer, as the case may be, shall record cogent reasons for recommending exoneration of the accused."; and

- (ii) after sub-rule (7), as so amended, the following new sub-rule (8) shall be added, namely:

"(8) On receipt of the inquiry report from the Inquiry Officer or Inquiry Committee, as the case may be, the Administrative Department concerned shall submit the case to the Chief Minister or Chief Secretary, if so required, within fifteen (15) days for orders."

5. In rule 14, in sub-rule (4), in clause (b), for the word "seven", the word "ten" shall be substituted.

6. In rule 15, the full stop, appearing at the end, shall be replaced by a colon and thereafter the following proviso shall be added, namely:

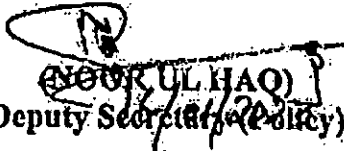
"Provided that the hearing officer shall submit the report to the competent authority within twenty one (21) days of affording opportunity of personal hearing to the accused;"

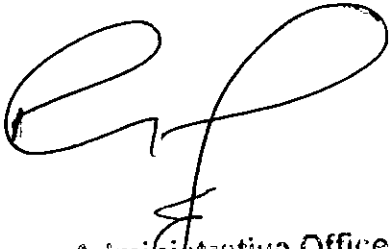
**CHIEF SECRETARY,
KHYBER PAKHTUNKHWA.**

ENDST: NO & EVEN DATE

Copy is forwarded to the:-



1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department.
2. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. Principal Secretary to Governor, Khyber Pakhtunkhwa.
5. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. Registrar Peshawar High Court, Peshawar.
11. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.
14. Manager, Printing and Stationery Department, Peshawar with the request to publish the same in the official gazette.


(NOOR UL HAQ)
Deputy Secretary (Policy)


Administrative Officer
Peshawar Wildlife Zoo

Annen-V

15

	OFFICE OF THE DEPUTY DIRECTOR/ DIVISIONAL FOREST OFFICER WILDLIFE, PESHAWAR ZOO, PESHAWAR	
	Main Palosi Road Rahatabad, Opposite Pakistan Forest Institute, Peshawar. Phone no: 091-7256677 Email: zoopeshawar@gmail.com	
No.	/P-Zoo,	Dated: 6 / 1 / 2023

To

Mr. Saif ullah Mali,
Peshawar Zoo

Subject:

EXPLANATION LETTER FOR NEGLIGENCE OF DUTY

Your explanation called by administrative office on 03-01-2023 under Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011 for not pursuing and habitual negligence towards your duties and directed you to report Deputy Director Office till that you are unable to report and compliance. It shows your non-serious attitude and misconduct.

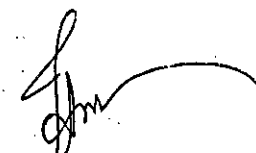
You are provided with 3 days' time till 9 January 2023 to explain your position and mend your ways. If you failed to compliance action would be taken under Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011.

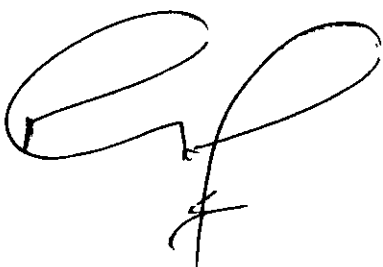
Deputy Director Wildlife
Peshawar Zoo, Peshawar

No. 2673-74 /P-Zoo

Copy forwarded for the information to the;

1. Administrative Officer Peshawar Zoo.
2. Personal File


Deputy Director Wildlife
Peshawar Zoo, Peshawar





OFFICE OF THE ADMINISTRATIVE OFFICER
PESHAWAR ZOO



16

Phone: 091-5610011 Email: zoocare11@gmail.com

No. /AO-Zoo

Dated Peshawar Zoo the 02/01/2023

بجانب:

سیف اللہ (مالی) پشاور چڑیا گھر

کارکردگی اور نظم و ضبط کے قواعد 2011 کی خلاف ورزی

عنوان:

آپ کو مطلع کیا جاتا ہے کہ پچھلے 03 ماہ سے آپ کی ڈیوٹی چڑیا گھر کے زیر اہم کی طرف بیٹ میں لگائی گئی ہے۔ آپ کو اوپر کی طرف سے روزانہ کی بنیاد پر اپنی بیٹ میں کام کرنے کو کہا جاتا ہے لیکن اسکے باوجود آپ اپنے کام کی طرف بلکل توجہ نہیں دیتے اور اپنے بیٹ میں زیادہ تر موجود بھی نہیں ہوتے۔ اسکے علاوہ آپ کو کئی بار ایڈمن آفیسر صاحب نے خود بھی کام کرنے کا کہا ہے لیکن پھر بھی آپ نا تو ڈیوٹی پر حاضر ہوتے ہو اور نا ہی اپنے بیٹ میں کام کرتے ہو۔

لہذا آپ کو ایڈمن آفس کے تحت (relieved from official duty) کر دیا گیا ہے اور مزید سرکاری احکامات کے لیے ڈپٹی ڈائریکٹر پشاور چڑیا گھر کے دفتر میں رپورٹ کرنے کی ہدایت کی گئی ہے۔

ایڈمن آفیسر پشاور چڑیا گھر

حوالہ نمبر AO-Zoo 436-437

1- کاپی برائے اطلاع ڈائریکٹر پشاور چڑیا گھر۔

2- کاپی برائے اطلاع ڈپٹی ڈائریکٹر پشاور چڑیا گھر، برائے خیبر پختونخوا کارکردگی اور نظم و ضبط کے قواعد 2011 کے تحت سیف اللہ (مالی) کے خلاف انکوائری کی درخواست ہے۔

02/01/2023
ایڈمن آفیسر پشاور چڑیا گھر
Administrative Officer
Peshawar Wildlife Zoo
Peshawar

03/01/2023

Administrative Officer
Peshawar Wildlife Zoo
Peshawar



ازدفتر ایڈمن آفیسر لمب ڈویژنل وائلڈ لائف آفیسر پشاور چڑیا گھر
مین پلوسی روڈ راحت آباد، بالمقابل پاکستان فاریسٹ انسٹی ٹیوٹ، پشاور



17

ای میل: zoocare11@gmail.com

فون: 091-7256677

مورخہ: 2022/03/31

مراسلہ نمبر: AO(Zoo)

بجانب:

سیف اللہ (مالی پشاور چڑیا گھر)

مسلسل غیر حاضری۔ جواب طلبی

زیر دستخطی نے نوٹس کیا ہے کہ آپ مارچ 2023 میں اپنی سرکاری ڈیوٹی سے 06 دن جان بوجھ کر غیر حاضر رہیں اور متعدد بار ہدایت کے باوجود آپ کی کارکردگی انتہائی خراب ہے اور آپ کی سرکاری ڈیوٹی میں غفلت ہے۔

لہذا آپ کو سختی سے ہدایت کی جاتی ہے کہ آپ سرکاری ڈیوٹی سے جان بوجھ کر غیر حاضری اور اپنی ناقص کارکردگی کے بارے میں اپنا وضاحتی بیان ایڈمن آفیسر کے دفتر میں جمع کرا دیں۔ بصورت دیگر آپ کے خلاف کارکردگی اور نظم ضبط کے قواعد 2011 کے تحت سخت قانونی کارروائی شروع کی جائے گی۔

ایڈمن آفیسر پشاور چڑیا گھر

671

بجوالہ نمبر

کاپی برائے اطلاع و قانونی کارروائی ڈائریکٹر، پشاور چڑیا گھر کو ارسال کی گئی۔

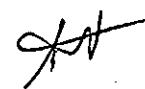
کاپی برائے اطلاع و قانونی کارروائی ڈپٹی ڈائریکٹر، پشاور چڑیا گھر کو ارسال کی گئی۔

31/3/2023
ایڈمن آفیسر پشاور چڑیا گھر
Administrative Officer
Peshawar Wildlife Zoo
Peshawar

OFFICE ORDER NO. 58 DATED 31/03 /2023
ISSUED BY MUHAMMAD NIAZ DIRECTOR/ CONSERVATOR WILDLIFE
PESHAWAR ZOO, PESHAWAR

18


Mr. Saif Ullah serving as Mali, in Peshawar Zoo, is a habitual absentee without any application or getting prior approval. His willful absence from duty from 26, March 2023 to 28, March 2023 is hereby treated as leave without pay. He is also warned to be careful in future otherwise strict action will be initiated against him.

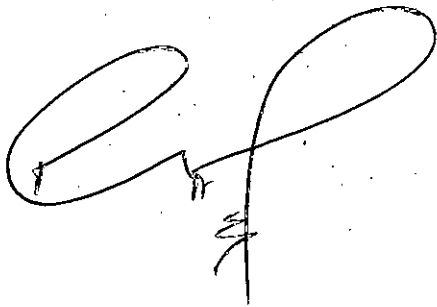

(Muhammad Niaz)
Director/Conservator Wildlife
Peshawar Zoo, Peshawar.

No. 2397-2401 p-Zoo,

Copy forwarded for information and necessary action to the:-

1. Deputy Director/DFO Peshawar Zoo.
2. Administrative Officer Peshawar Zoo.
3. Accountant Peshawar Zoo.
4. Mr. Saif Ullah Mali.
5. Personal file.


Director/Conservator Wildlife
Peshawar Zoo, Peshawar.





ازد فترائیڈ من آفیسر بسب ڈویژنل ڈائریکٹر آفیسر پشاور چڑیا گھر
مین پلوسی روڈ راحت آباد، بالقابل پاکستان فاریسٹ انسٹی ٹیوٹ، پشاور



29

ای میل: zoocare11@gmail.com

فون: 091-7256677

مورخہ: 2023/04/04

مراسلہ نمبر: AO(Zoo) 691

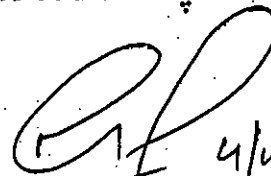
بجانب:

سیف اللہ (مالی پشاور چڑیا گھر)

مسلسل غیر حاضری۔ جواب طلبی

آپ 25 مارچ 2023 سے آج تک بغیر کسی درخواست کے اپنی سرکاری ڈیوٹی سے جان بوجھ کر غیر حاضر ہیں۔ اور متعدد بار ہدایت کے باوجود آپ کی کارکردگی انتہائی خراب ہے اور آپ کی سرکاری ڈیوٹی میں غفلت ہے۔

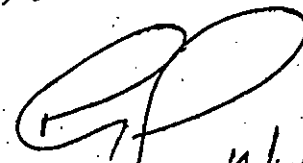
لہذا آپ کو سختی سے ہدایت کی جاتی ہے کہ آپ سرکاری ڈیوٹی سے جان بوجھ کر غیر حاضری اور اپنی ناقص کارکردگی کے بارے میں اپنا وضاحتی بیان تین دن میں ایڈمن آفیسر کے دفتر میں جمع کرا دیں۔ بصورت دیگر آپ سبھی خلاف کارکردگی اور نظم ضبط کے قواعد 2011 کے تحت سخت قانونی کارروائی شروع کی جائے گی۔

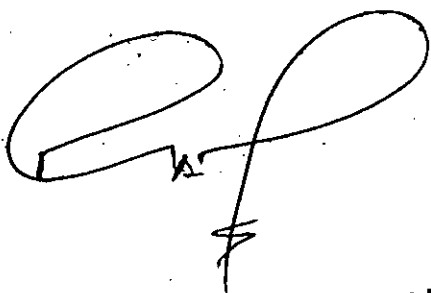

ایڈمن آفیسر پشاور چڑیا گھر
4/4/2023

بحوالہ نمبر 692-93

1. کاپی برائے ڈائریکٹر، پشاور چڑیا گھر کو ارسال کی گئی۔ سیف اللہ مالی کی مسلسل غیر حاضری کے خلاف قواعد کے تحت انکوائری شروع کرنے کی استدعا ہے۔

2. کاپی برائے ڈپٹی ڈائریکٹر، پشاور چڑیا گھر کو ارسال کی گئی۔ سیف اللہ مالی کی مسلسل غیر حاضری کے خلاف قواعد کے تحت انکوائری شروع کرنے کی استدعا ہے۔


ایڈمن آفیسر پشاور چڑیا گھر
4/4/2023
Administrative Officer
Peshawar Wildlife Zoo
Peshawar



Peshawar Wildlife Zoo



OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE,
PESHAWAR ZOO PESHAWAR

Posi Road Rahatabad, Opposite Pakistan Forest
Institute, Peshawar, Phone: 091-7256677
Email: zoopeshawar@gmail.com



No. 2436

/P-Zoo

Dated:

06/04/2023

To

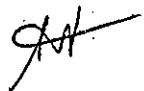
Mr. Saif Ullah S/O Rosham Khan
Mali
Mohallah Mandori Urmar Payan, Peshawar

Subject: -

EXPLANATION/WILLFUL ABSENCE.

It has been observed with grave concern that you are absent from official duty from 26st March, 2023 to till date without any information. Besides, your absenteeism is habitual, which is contrary to office decorum and against discipline.

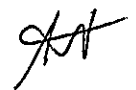
You are directed to explain your position within two days otherwise strict disciplinary action shall be initiated against you under E&D rules.

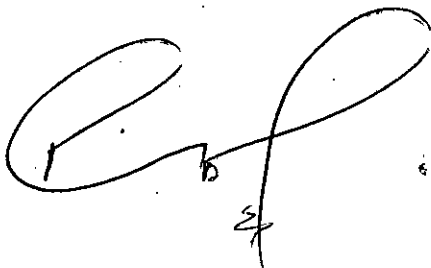

Director/Conservator Wildlife
Peshawar Zoo, Peshawar

No. 2437 - 38 /P-Zoo

Copy forwarded for information and necessary action to the:-

1. Deputy Director/DFO Wildlife Peshawar Zoo.
2. Administrative Officer /SDWO Peshawar Zoo.


Director/Conservator Wildlife
Peshawar Zoo, Peshawar



(21) E-01 Saifullah Jib



OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE,
PESHAWAR ZOO PESHAWAR



Main Palosi Road Rahat Road Opposite Pakistan Forest
Institute, Peshawar, Phone: 091-7256677
Email: zoopeshawar@gmail.com

No. 2465 /P-Zoo

Dated: 10/04/2023

To

Mr. Saif Ullah S/O Rosham Khan
Mali,
Mohallah Mandori Umar Payan, Peshawar

Subject: - LAST WARNING.

Reference: This office letter No.2436/P.Zoo dated 06/04/2023.

You are warned for the last time to avoid inefficiency, willful absenteeism and ensure duty as per notified schedule in your own interest. You are directed to explain your position within 07 days otherwise you will be removed from government service under E&D Rules 2011 without any further notice.

[Signature]
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

No. 2468-67 /P-Zoo



Copy forwarded for information and necessary action to the:-

1. Deputy Director/DFO Wildlife Peshawar Zoo.
2. Administrative Officer /SDWO Peshawar Zoo.

[Signature]
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

[Large Signature]

Administrative Officer
Peshawar Wildlife Zoo

	OFFICE OF THE ADMINISTRATIVE OFFICER/ SUB-DIVISIONAL WILDLIFE PESHAWAR ZOO PESHAWAR Main Palosi Road Rah... opposite Pakistan Forest Institute, Peshawar. Phone: 091-7256677 Email: zoopeshawar@gmail.com	
	No. /AO-Zoo	

بجانب

سیف اللہ، مالی پشاور چڑیا گھر (محلہ مندوری، اڑمڑ پائیاں، پشاور)

وضاحت نامہ برائے غیر حاضری

عنوان

متعدد بار آپ رپونٹنگ آفیسر یا متعلقہ ڈائریکٹر کو بتائے بغیر اپنی ڈیوٹی سے غیر حاضر پائے گئے ہیں۔ پچھلے کئی دنوں سے آپ ڈیوٹی سے غیر حاضر ہیں جو کہ آپ کی لاپرواہی اور سرکاری ڈیوٹی کے ساتھ غیر ذمہ داری کا ثبوت ہے۔ آپ 15 مئی 2023 سے آج تک بغیر کسی درخواست کے اپنی سرکاری ڈیوٹی سے غیر حاضر ہیں، متعدد بار ہدایات کے باوجود آپ کی کارکردگی انتہائی خراب ہے اور آپ کی سرکاری ڈیوٹی میں غفلت ہے۔ لہذا آپ کو سختی سے ہدایت کی جاتی ہے کہ آپ سرکاری ڈیوٹی سے غیر حاضری اور اپنی ناقص کارکردگی کے بارے میں اپنا وضاحتی بیان تین دن میں دفتر ہذا کو جمع کروائیں۔ اگر آپ تعمیل کرنے میں ناکام رہے تو آپ کے خلاف خیر پختہ نخواستہ کارکردگی نظم و ضبط قواعد 2011 کے تحت کارروائی عمل میں لائی جائے گی۔

ایڈمنسٹریشن آفیسر
پشاور چڑیا گھر

حوالہ نمبر 939-40

- 1۔ کاپی برائے ڈائریکٹر، پشاور چڑیا گھر کو ارسال کی گئی۔ سیف اللہ مال کی مسلسل غیر حاضری کے خلاف قواعد کے تحت انکوائری شروع کرنے کی استدعا ہے۔
- 2۔ کاپی برائے ڈائریکٹر، پشاور چڑیا گھر کو ارسال کی گئی۔ سیف اللہ مال کی مسلسل غیر حاضری کے خلاف قواعد کے تحت انکوائری شروع کرنے کی استدعا ہے۔

ایڈمنسٹریشن آفیسر
پشاور چڑیا گھر
Administrative Officer
Peshawar Wildlife Zoo
Peshawar

(Handwritten signature)



OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE,
PESHAWAR ZOO PESHAWAR

Main Palosi Road, Opposite Pakistan Forest
Institute, Peshawar, Phone: 091-7256677
Email: zoopeshawar@gmail.com



23

No. 2896

/P-Zoo

Dated: 6/6/2023

To

Mr. Saif Ullah S/O Rosham Khan
Mali
Mohallah Mandori Umar Payan, Peshawar

Subject: -

EXPLANATION/WILLFUL ABSENCE.

It has been observed with grave concern that you are absent from official duty from 15 May, 2023 to till date without any information. Besides, your absenteeism is habitual, which is contrary to office decorum and against discipline.

You are directed to explain your position within 07 days otherwise strict disciplinary action shall be initiated against you under E&D rules.

[Signature]
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

No. 2897-98 /P-Zoo

Copy forwarded for information and necessary action to the:-

- 1. Deputy Director/DFO Wildlife Peshawar Zoo.
- 2. Administrative Officer /SDWO Peshawar Zoo.

[Signature]
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

Administrative Office
Peshawar Wildlife Zoo

24



OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE,
PESHAWAR ZOO PESHAWAR
Main Palosi Road, Peshawar, Opposite Pakistan Forest
Institute, Peshawar, Phone: 091-7256677
Email: zoopeshawar@gmail.com



No. 2939 /P-Zoo Dated: 12/06/2023

To

Mr. Saif Ullah S/O Rosham Khan
Mali Mohallah Mandori Urmar Payan, Peshawar

Subject: - **LAST WARNING.**

Reference: This office letter No.2436/P.Zoo dated 06/04/2023 No.2465/P-Zoo dated 10/04/2023.

You are warned for the last time to avoid inefficiency, willful absenteeism and ensure duty as per notified schedule in your own interest. You are directed to explain your position within 15 days otherwise you will be removed from government service under E&D Rules 2011 without any further notice.

SA
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

No. _____ /P-Zoo

Copy forwarded for information and necessary action to the:-

- 1. Deputy Director/DFO Wildlife Peshawar Zoo.
- 2. Administrative Officer /SDWO Peshawar Zoo.

SA
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

[Handwritten signature]

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اللہ ہی کے لیے ہیں مشرق و مغرب القرآن

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روزنامہ

سید تاج میر شاہ

عہدہ کے بانی

مشرق

سلسلہ اشاعت کے 56 سال

پشاور اسلام آباد کراچی کوئٹہ اور خیبر پختونخوا کی تمام شہروں میں دستیاب

ABC CERTIFIED

جلد 50 نمبر 10 تاریخ 29 جون 2023ء 1444ھ قیمت 30 روپے

29-06-2023

نوٹس فیبر حاضری

آپ کی خدمت اللہ اور مومنوں کی راہ میں جاری کاروبار نمبر 1-17301-0448661

Mall (BPS-03) محلہ فیبر حاضری اور زبان تحصیل فیبر حاضری 05-06-2023ء کے تحت لکھن آباد کے

کے درجہ نمبر 938/AO.ZOO صورت 05-06-2023ء کے مطابق سرکاری نوٹس نمبر 168

ہے۔ آپ کو درج ذیل حکام نمبر No.2896/P.Zoo صورت 06-06-2023ء اور سرکاری نوٹس نمبر

NO.2939/P.Zoo صورت 12-06-2023ء کو مطلع کیا گیا کہ آپ اپنی تمام عہدہ داری کی منتقلی

میں کریں لیکن آپ اپنی ذمہ داری پر استعفیٰ دینے کے بعد اس کے آئندہ کوئی ذمہ داری نہیں رہے گی اور

مطلوبہ کام پختہ کر کے نوٹس نمبر کے تحت درج ذیل حکام کو اپنی ذمہ داری سونپ کرنا چاہئے اور

اپنی تمام عہدہ داری کی منتقلی کو عملی جامہ پہنانا چاہئے۔ اس کے علاوہ آپ کے عہدہ کے تحت

موجودہ طور پر 9 کے تحت حکام کو درج ذیل کی حالت میں اور آپ کو مطلع کیا جاتا ہے کہ عہدہ

ختم ہے۔

ذمہ داری پشاور چڑیا گھر

آفس کیمپس بلڈنگ پشاور چڑیا گھر

فون نمبر 091-7256677

حفاظت ایمان
ذمہ داری پشاور

Our Faith
Corruption
Free Pakistan

INE(R) 1467/2023

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Saifullah mali



**OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE,
PESHAWAR ZOO PESHAWAR**

Main Palosi Road Rahatabad, Opposite Pakistan Forest
Institute, Peshawar, Phone: 091-7256677
Email: zoopeshawar@gmail.com



No. 674 /P-Zoo

Dated: 19/09/2023

To

Mr. Saif Ullah
Ex-Mali, Peshawar Zoo
Address: Mohallah Mandori Urmar Payan, Peshawar

Subject: **APPEAL FOR RE-INSTATEMENT IN SERVICE**

In compliance of the Chief Conservator Wildlife Khyber Pakhtunkhwa Peshawar letter No. 2141/WL/E dated 15-09-2023, you are directed to attend the office of Chief Conservator Wildlife Khyber Pakhtunkhwa Peshawar Shami Road, Peshawar for personal hearing on 28-09-2023 at 10:00hrs alongwith all record pertaining to the appeal for defense, if any.

JAT
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

No. 675 /P-Zoo

Copy forwarded to Chief Conservator Wildlife Khyber Pakhtunkhwa Peshawar with reference to his letter No. 2141/WL/E dated 15-09-2023 for information, please.

JAT
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

[Handwritten signature]

(27)

OFFICE OF THE CHIEF CONSERVATOR WILDLIFE KHYBER PAKHTUNKHWA
PESHAWAR

To

The Director/Conservator Wildlife
Peshawar Zoo

Office of the D/CWL
Peshawar Zoo, Peshawar

Diary No. 156

Dated 19/9/23

No. 210/WLE

Dated Peshawar the 15/9/2023.

Subject: APPEAL FOR RE-INSTATEMENT IN SERVICE

Reference: Your letter No.626/P-Zoo, dated 03-09-2023

Please refer to above and direct Mr. Saifullah. Ex-Mali. to appear before the undersigned for personal hearing on 28-09-2023 at 1000 hrs. He may also be asked to bring all the record pertaining to the appeal for his defense if any.

Mohsin Farooque
15/9/23

(Dr. Mohsin Farooque)
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar

سوال نامہ بابت انگواڑی برائے سیف اللہ، سابقہ مالی چڑیا گھر پشاور

بحور نمبر: 28 ستمبر 2023

سوال نمبر	سوال کی تفصیل
1-	ڈائریکٹر پشاور کے مطابق آپ نے اپنی فرائض منصبی بھی بھی خوش اسلوبی کے ساتھ نہیں نبھائے، کیا یہ سچ ہے؟
جواب:	صیاب عالی۔ عرض ہے کہ میں نے تقریباً 9 سالوں سے اس ادارے میں فرائض منصبی سرانجام دیے ہیں۔ خوش اسلوبی سے نبھاتا رہا اور کبھی کسی آفسران یا کوئی شکایت کا موضوع نہیں بنا۔
2-	کیا آپ اکثر و بیشتر ڈیوٹی سے غیر حاضر رہتے تھے؟
جواب:	صیاب عالی عرض ہے کہ تقریباً 15 سالوں سے اس ادارے میں فرائض منصبی سرانجام دیے ہیں۔ اکثر و بیشتر ڈیوٹی سے غیر حاضر نہیں رہے۔
3-	کیا آپ کے افسران بالائے کئی بار آپ سے اس بارے میں وضاحت طلب کی تھی؟
جواب:	صیاب عالی۔ میں نے کبھی کسی آفسران یا کوئی شکایت کا موضوع نہیں بنا۔ تو وضاحت دینے کا کوئی موقع نہیں ملتا۔
4-	کیا آفس انتظامیہ کی جانب سے آپ کو متعدد بار وارننگ بھی جاری کئے گئے تھے؟
جواب:	عرض ہے کہ مجھے وہی قسم کی کوئی وارننگ بھی وصول نہیں ہوئی۔
5-	کیا آپ مختلف اخبار میں کوئی اشتہار یا نوٹس چھپ چکے ہیں؟
جواب:	عرض ہے کہ میں نے کبھی کوئی اشتہار یا نوٹس چھپ نہیں چکے۔
6-	کیا آپ نے اس نوٹس کا جواب دیا کہ نہیں؟
جواب:	صیاب عالی عرض ہے کہ میں نے اس نوٹس کا جواب دیا کہ نہیں۔

سوال نمبر	سوال کی تفصیل
7-	کیا آپ بخلاف تمام قانونی چارہ جوئی کی گئی تھی جسکی بنیاد پر آپ کو نوکری سے برخاست کیا گیا؟
جواب:	جواب: ہاں میرے علم کے مطابق ہفت روزہ کے مطابق ہاں چارہ جوئی کی گئی تھی جسکی بنیاد پر آپ کو نوکری سے برخاست کیا گیا۔
8-	مورخہ 2 اگست 2023 کے ایٹل کے مطابق آپ حادثہ کے بعد نشہ آور دوائی استعمال کرتے ہیں۔ کیا یہ سچ ہے؟
جواب:	جواب: ہم نشہ آور دوائی استعمال کرتے ہیں۔
9-	آپ کے بارے میں مورخہ 13 جون 2023 کے مطابق آپ کا تعلق نادو لوگوں کیساتھ تھا جسکی وجہ سے آپ نشیاتی کے عادی بن گئے جسکی وجہ سے آپ کو علاج کیلئے ہسپتال میں داخل کر دیا گیا۔ آپ کا اس حوالے سے کیا موقف ہے؟
جواب:	جواب: ہم نشہ آور دوائی استعمال کرتے ہیں۔
10-	ہسپتال کی رپورٹس کے مطابق آپ گزشتہ 9 سال سے مختلف قسم کے نشیاتی استعمال کر رہے ہیں جبکہ آپ کا موقف ہے کہ آپ حادثے کے بعد نشہ آور دوائی استعمال کر رہے ہیں۔ یہ دونوں چیزیں ایک دوسرے سے مکمل طور پر متضاد ہے۔ آپ اس حوالے سے کیا وضاحت دیں گے؟
جواب:	جواب: ہم نشہ آور دوائی استعمال کرتے ہیں۔

Administrative Officer
Peshawar Wildlife Zoo
Peshawar