

FORM OF ORDER SHEET

Court of _____

Appeal No. 323/2024

_____ proceedings with signature of judge

2

3

27/02/2024

The appeal of Qazi Muhammad Aamir Khan
refiled today by registered post through Mr. Shahzad
Shakoor Advocate. It is fixed for preliminary hearing
before touring Single Bench at A. Abad on

By the order of Chairman


REGISTRAR

The appeal of Qazi Muhammad Aamir Khan received today i.e on 09.02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days:

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no.3 to 6 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent be deleted/struck out from the list of respondents.
- 2- Page nos. 19 & 20 of the appeal are illegible be replaced by legible/better one.

No. 302 /S.T.

Dt. 14/02 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

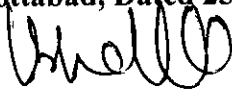
Shahzad Shakoor Adv.
High Court A.Abad.

Resubmitted with the remarks/reply Para-wise/as under.

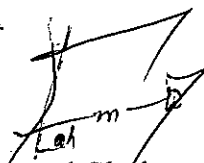
- 1) That though all the respondents impleaded in service appeal are proper parties and their role in the proceedings of the event based on issuance of impugned order is important, but under Sub rule 4 of Rule 6 of Khyber Pukhtunkhwa Service Tribunal Rules 1974, as mentioned in objection sheet of Tribunal under Office Order dated 02/02/2024, 04 respondents has now been deleted from the panel of respondents, In future if any of them would be deemed necessary to array respondent then application for the same shall be submitted.
New page No 1, and its extra copies are also compiled.
- 2) That better copies of pages No 19 & 20 prepared and copies of that are also compiled under page No 19(a) and 20(a), further more extra copies of pages are also submitted.

In the light of above it is requested that case may please be fixed before SB for preliminary hearing on the next tour of camp Court Abbottabad.

Abbottabad, Dated 25/02/2024



(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.



(Shahzad Shakoor)
Advocate High Court
Abbottabad

Abbott Law Chamber
Office No 51, Ayub Tanoli lawyer plaza
Abbottabad. 0333-5025002, 0316-9343818

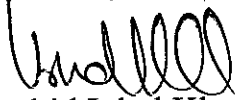
Registrar
ST Peshawar

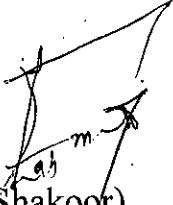
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Office No 51, Ayub Tanoli lawyer plaza
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**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No: 323 of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

The Chief Minister through Principal Secretary to Chief Minister
Government of Khyber Pakhtunkhwa, Peshawar and others.

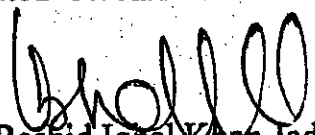
Respondents

SERVICE APPEAL

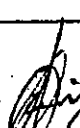
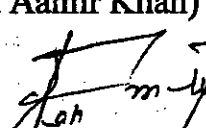
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5	Copy of letter dated 22/09/2022 issued by respondent no 3.	D	22
6	Copy of Show Cause Notice dated 08/12/2022, issued by respondent No2	E	23 to 24
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Dated 07/02/2024


(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.

Through


(Qazi Muhammad Aamir Khan)
Appellant

(Shahzad Shakoor)
Advocate High Court Abbottabad

1

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: _____ of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Versus

- 1 The Chief Minister through Principal Secretary to Chief Minister Government of Khyber Pakhtunkhwa, Peshawar.
- 2 The Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE NOTIFICATION NO. SO(B&T)E & SE/11-13/SS ISLAMIYAT/TBB/26 DATED PESHAWAR THE, 19TH OCTOBER.2023 ISSUED BY (RESPONDENT NO 2) SECRETARY ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA,PESHAWAR WHEREBY IMPOSED MINOR PENALTY OF "WITHHOLDING OF TWO ANNUAL INCREMENTS FOR TWO YEAR, THE SAID NOTIFICATION IS ILLEGAL INEFFECTIVE UPON THE LEGAL RIGHTS OF THE APPELLANT AS PER FACTS AND LAW OF THE CASE.

PRAER:-

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION NO. SO(B&T)E & SE/11-13/SS ISLAMIYAT/TBB/26 DATED PESHAWAR THE, 19TH

OCTOBER.2023 ISSUED BY (RESPONDENT NO 2) MAY PLEASE BE SET ASIDE AND ACCEPTANCE OF PENDING DEPARTMENTAL APPEAL.

Respectfully Sheweth,

FACTS

- 1) That appellant is qualified as B.A (Hons), M.A Arabic, M.A Islamyat, M.Ed & Al-Lisan-ul Arabi, and presently performing his duties in the capacity of principal in BPS 19 in Elementary and Secondary Education Department KP. Copies of documents are annexed as **Annexure "A"**

- 2) That appellant being an experience hand and expert in review of textual materials of Text books of KP textbook Board Peshawar (respondent No 4), under the official control of Directorate of Curriculum & Teacher Education KP (respondent No 3) and in the previous course of reviewer process, appellant is being nominated as reviewer by the respondent No 3, and he always delivered/performed his professional duties to the quite satisfaction of concerned authorities, and his professional carrier is so ideal. Copies of previous letters issued by (DCTE) are annexed as **Annexure "B"**

- 3) That respondent No 3 (DCTE) issued an order dated 21/04/2022 wherein appellant being curriculum/subject expert, was nominated for Provincial Textbooks Review Committee (PTRC) and in this respect, meeting for review of Model Textbooks based on SNC(National Curriculum Council Islamabad) which was to be scheduled with effect from 22/04/2022 to 25/04/2022. Moreover appellant was nominated at serial No 2 of the said Order dated 21/04/2022 and he was nominated to the extent of Islamiat-Grade VII only and through letter dated 26/04/2022, he also nominated for select Committee. Copies of orders dated 21/04/2022 & 26/04/2022 issued by respondent No 3 (DCTE) are annexed as **Annexure "C"**.

- 4) That factually the new educational session starts from 1st April of every year, but respondent no 3 and others started it very late and

on urgent basis, while appellant was a member of Provincial Textbooks Review Committee (PTRC), the said Committee works at stage No 6 while below five stages have been completed by the respondent No 4/Publisher (1.Policy, 2.Author/writer, 3. Composing, 4.Editing/Proof reading, 5. Internal Review Committee/IRC) and ordinarily they were responsible for their work/task, similarly at stage No 6 to 8 have been done by the respondent No 3 (6. PTRC, 7. Select Committee, 8. NOC) and they were also responsible for their work.

- 5) That after completing the Model Textbook Islamiat of class 07th (Grade VII) respondent No 03 (DCTE) issued an Order dated 22/09/2022 for examination of review record and conformity of errors/mistakes within two days, identified by respondent no 2. Copy of Order dated 22/09/2022 is annexed as Annexure "D"
- 6) That after passing three months, respondent No 1 issued Show Cause Notice through letter issued by respondent No 2 on 08/12/2022, appellant submitted his reply to the Show Cause Notice. Copies of said Notice and reply are annexed as Annexure "E" & "F"
- 7) That respondent No 02 wrote a letter dated 02/02/2023 to respondent No 4 for appearance of personal hearing of appellant and others before the Secretary Culture, Tourism, Archaeology & Museums Department PK Peshawar on 09/02/2023, appellant appeared on the date fixed before the concerned Officer for the personal hearing. Copy of letter dated 02/02/2023 is annexed as Annexure "G"
- 8) That after passing 08 months, respondent No 02 issued impugned Notification dated 19/10/2023, wherein imposed "withholding of two Annual Increments for two years" upon appellant with immediate effect; Moreover in the case of appellant, there was never/ever conducted any regular inquiry, nor received any order/letter in this respect or appellant has not at all, no knowledge about any proceedings of regularly inquiry to the extent of

appellant, as shown in the Para no 02 & 03 of the impugned Notification. Copy of Impugned Notification is annexed as Annexure "H"

- 9) That appellant preferred departmental appeal against the impugned Notification dated 19/10/2023, before respondent No 1 through registered post dated 08/11/2023, which is not decided yet within the statutory period of 90 days, Consequently this appeal is being filed with time of 120 days of submission of his departmental appeal. Copy of Departmental Appeal along with registered receipt, is annexed as Annexure "I" & "J" Hence this appeal inters-alia on the following ground.

Grounds

- a) That respondents have not fulfilled the legal procedure as laid down in E&D Rules 2011 as mentioned in their all proceedings which is shown to be completed under the same Rules, Moreover in the whole proceedings, clear contradictions are available and illegally issued the impugned Notification which is ineffective, unlawful and against all the norms of justice, and liable to be set aside.
- b) That impugned Notification dated 19/10/2023 has issued on surmises and presumption basis, as it is totally incorrect, factually appellant did not receive any letter/information about regular inquiry nor got any knowledge about inquiry committee as shown its Para No 02 & 03, so in appellant's case, there was not conducted any regularly inquiry or any kind of other inquiry, list of witnesses, opportunity of cross examination etc is out of question.
- c) That appellant is an experience hand and there was never ever any flaws, available in his work as reviewer.


- d) That in the present case, appellant was deputed and nominated to the extent of review of textbooks of class VII, but surprisingly responsibilities of others, illegally and arbitrarily attributed upon appellant to save the skin of their favourite children, as class 4th, Islamiat 8th, Urdu 7th did not relate impugned process.
- e) That respondents did not explain the real position of the Test Edition, and when matter reached as hot scandalized in general public, then appellant's neck fitted as scapegoat and others responsibilities also put on his shoulders, while some others having political influence in their favour, treated their favorite children and did not involve them in impugned proceedings of E & D Rules 2011, under the law of equity and treated discrimination.
- f) That the impugned Notification dated 19/10/2023, issued by respondents is against the services law and they did not took any trouble to examine the case properly, and committed misreading and non-reading the relevant law and facts, and incorrectly illegally passed the Impugned Notification.
- g) That it is undoubted facts that respondents illegally snatched the legal rights of the appellant in an uncivilized way in a very haste manner, which is against the equity and there is no single example is available in the civilized society, and uptill now appellant has not received his due payment of his official job, nominated under orders of DCTE (respondent No 3) dated 21/04/2022 & dated 22/09/2022.
- h) That appellant is dragged into litigation, the conduct of the respondents is admittedly arbitrary capricious unjust and against all norms of justice and as such requires indulgence of this Honourable Court by awarding appropriate Cost to the respondents.

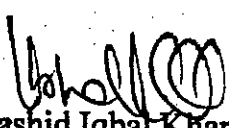
i) That respondents ignored the provisions of Article 4 and 25 of the Constitution of Pakistan while exercising their illegal impugned Notification and their exercising discretionary powers in refusing the factual and legal relief to the appellant.

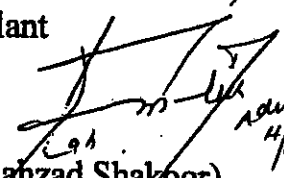
It is, therefore, respectfully prayed that on acceptance of instant service appeal, Impugned Notification No. SO(B&T)E & SE/11-13/SS Islamiyat/TBB/26 Dated Peshawar The, 19TH October.2023 Issued by (Respondent No 2) may please be set aside and acceptance of pending departmental appeal and consequential benefits/promotion alongwith all back benefits.

Any other relief for which the appellant is entitled, and the same is not asked/prayed specifically, may very kindly be granted in favour of the appellant.

Dated 07/02/2024.


(Qazi Muhammad Aamir Khan)
Appellant


(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad


(Shanzad Shakoor)
Advocate High Court Abbottabad

Attorney Abbottabad.
Abbott Law Chamber
Office No 51, Ayub Tanoli lawyer plaza
Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

I, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, do here by affirm on oath that contents of instant appeal is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal and this instant appeal is first appeal & same nature of any other appeal is not pending before Honourable Tribunal

Dated 07/02/2024



7

Annexure A

7733
90-این ای ڈی-0081
1209189

علامہ اقبال اوپن یونیورسٹی



تصیق کی جاتی ہے

کے نام محمد طارق خان
فاضل محمد نواز خان
اسٹاٹ آباد

ابتداء عربی

میں سرٹیفکیٹ حاصل کیا ہے۔ اس نے کورس کی تمام شرائط اظہار کی کرتے ہوئے مقررہ امتحانات پاس کیے اور 85 فیصد نمبر حاصل کر کے امتحانی درجہ/گریڈ میں کامیابی حاصل کی۔ کورس ہمارے اساتذہ اور فلاحی افسر سے سرشار و سابقہ کے فیصلے سے مکمل کیا گیا۔

19 جنوری 1991ء

محمد رفیق

7733
EA-

90

رقم التعمیل 90-این ای ڈی-0081
رقم الحاد 1209189

جامعۃ علامہ اقبال لائیف ٹائمز



تشہد بأن

الطالب/الطالبة قاضی محمد طارق خان
ابن/بنت قاضی محمد نواز خان
من موالید منطقة ایبٹ آباد
حصل علی شهادة

اللیسانس العربی

قد أكمل جميع شروط المرحلة بنجاح واجتاز الامتحان بتقدير ممتاز
و بمعدل 85% و أتمت الدراسة عن طريق المراسلة
و التدريس المذاعة بواسطة الوسائل الإذاعية

التاريخ 19/1/91 م إستم آباد

محمد رفیق

Handwritten signature

6

Serial No. 000213..... الرقم المسلسل

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 247-ID/88..... رقم التسجيل

International Islamic University
Islamabad Pakistan



الجامعة الإسلامية العالمية
إسلام آباد - باكستان

This is to certify that QAZI M. AAMIR KHAN

تشهد الجامعة أن قاضي محمد عامر خان

son of QAZI M. NAWAZ KHAN

ابن قاضي محمد نواز خان

on having fulfilled the prescribed requirements in JUNE, 1989

قد انتمى المتطلبات الدراسية للجامعة في يونيو 1989

is awarded the degree of Bachelor of Arts (Hons)

ومنح بناء على ذلك درجة ليسانس الشرف

in Usul-ud-Din

في أصول الدين

He was placed in SECOND Class.

ونال تلك الشهادة بدرجة ثانية

We pray Allah to guide him to serve Islam and knowledge.

نسال الله أن يوفقه لخدمة الإسلام والعلم.

Z A

مدير الشؤون الأكاديمية

Director (Academics)

نائب رئيس الجامعة للشؤون الأكاديمية

Uso-President (Academics)

President

Issued in Islamabad on 1ST FEBRUARY, 1993. صدرت في إسلام آباد بتاريخ 1 فبراير 1993.

(=)

Roll No. G-6597390

0096

نمبر

Allama Iqbal Open University



علامہ اقبال اوپن یونیورسٹی

Gazi Muhammad Amer Khan

Regn. No.

90-11AD-0081

میریٹ نمبر

تاضی محمد عامر خان

بہاریٹ

Son/Daughter of

Gazi Muhammad Nawaz Khan

میریٹ نمبر ۱۱۹۸

خان

کر

having completed the prescribed requirements in Autumn, 1998 is awarded the degree of

MS.Ed. TEACHER EDUCATION

ایم۔ اے۔ ایڈ جی ایچ ایڈ

Marks secured 61 % marks and was placed

in B grade.

کی اے ایس کا نمبر ۶۱ فیصد کیلئے ہے۔

الٹرا سنڈ گریڈ

Mice Chancellor

میریٹ نمبر

Malamshah

Dated: 30TH SEP, 1999.

Controller of Examinations

This degree is to be read in conjunction with the Transcript, issued separately.

۳۰ ستمبر ۱۹۹۹ء

میریٹ نمبر

Handwritten signature

Annexure B,

12

**DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION KHYBER
PAKHTUNKHAWA (MANDIAN) ABBOTTABAD**

Phone 0992-382634 Fax # 0992-381527

NO. 4469-4504/SS-VIII

Dated 10/8/2011

To

Deputy Secretary (E&P)
Govt of Khyber Pakhtunkhwa
Text Book Board Peshawar

Subject:-

**DEVELOPMENT OF NEW TEXT BOOKS AND ITS NRC, SC, MEETINGS
APPROVAL ETC.**

I am directed to refer your letter No. E&P/7455 dated 30/07/2011 on the subject cited above.

The competent authority is pleased to formulate the relevant committees for NRC, SC and its NOCS due to 18 Amendment bill as per detail given below.

1. **Committee languages**
 - a. S.Tanweer Shah, SS DCTE
 - b. Mst. Tahira Jabeen, AD Trg DCTE
 - c. Qasi Muhammad Saeed, SS GHS Bagra
 - d. Mr. Awal Yaz, SS DCTE

Chairman
Member
Member
Member
2. **Committee Science**
 - a. Abrar Ahmed, SS DCTE
 - b. Mst. Ishrat Zakar, SS, DCTE
 - c. Mst. Sarwat Ghias, Instructor, RITE (F) Mansehra
 - d. Mr. Hamid Khan, SS, GHSS Nawansher Abbottabad

Chairman
Member
Member
Member
3. **Committee Mathematics**
 - a. Nadeem Sultan, SS DCTE
 - b. Mst. Samia Danish, SS DCTE
 - c. Mst. Farhat Yasmeen, Principal, GGSS Balakot
 - d. Mr. Khalid Mehmood, Instructor, PITE Peshawar.
 - e. Mujhaid Shah, Instructor, RITE (M) Mardan

Chairman
Member
Member
Member
Member
4. **Committee Social Sciences**
 - a. Mst. Syeda Sumira Bukhari, SS DCTE
 - b. Mr. Fazal-Ur- Rehman, SS DCTE

Chairman
Member
5. **Committee Islamiyat**
 - a. Safdar Rehman, Librarian DCTE
 - b. Hafiz Muhammad Ilyas, Principal GHSS Bagra Haripur
 - c. Mr. Qazi Muhammad Amir, SS, GHSS Bagnotar Abbottabad.

Chairman
Member
Member

TORs

1. All the committee members will strictly follow the Curriculum 2006-2007 as per provision.
2. All the International / National Standards will be followed for these tasks.
3. Keeping in view the sensitivity of assignment, no disputed comment will be included or amended

Di

P.T.O

13

4. The quality of the draft will be followed on guide lines provided in the curriculum 2006-2007 as per provision.
5. Scheme of studies, will be also kept in mind for comments selection.
6. In case of any discrepancy the concerned committee will be fully responsible for assigned task.
7. The task assigned will be completed in stipulated time.
8. The chairman of each committee will be fully responsible to maintain the relevant record, proofs and other material for ready referer ce.
9. The other member will be taken from IER, (Gomal University, Peshawar University, Hazara University) or field experts who already engaged in previous practices by the approval of worthy Director DCTE Abbottabad.
10. Each subject group will discuss from time to time with Deputy Director (Admn) / Deputy Director (Training) for streamlining the assigned task and will get Minutes of every weekly meeting regularly.
11. To ensure the best outputs relevant guidelines will be taken from internet facility provided in the resources room, local library and previous experienced hands.
12. It is hoped that each subject group will complete the allocated task not later than 30-09-2011, with full professional comment, zeal and sprit.
13. For NOCs the recommendation of NRC and SC meeting will be also kept in mind.
14. For SC the recommendations of NRC will be followed.
15. Each NRC will thoroughly study the material provided i.e Curricula, Guide lines, Activities, Assessment Procure and all relevant aspects of review.

NOTE:- For further guidelines and details please contact Deputy Director (Admn) Local Directorate .


SUBJECT SPECIALIST-VIII
For /- Director

CC to:-

1. Chairman Text Book Board Khyber Pakhtunkhwa Peshawar.
2. Ps to Secretary, E & SE Khyber Pakhtunkhwa Peshawar.
3. All the committee members
4. PA to Directoress E & SE Khyber Pakhtunkhwa Peshawar
5. EDOs Concerned.
6. DD (Admn) Local Directorate
7. DD (Training) Local Directorate
8. P.A to Director, Local Directorate
9. Director PITE Peshawar.
10. Principals Concerned RITE

**DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION KHYBER PAKHTUNKHWA
PROVINCE ABBOTTABAD**

No. 5972-83/Subject Specialist-II.
Dated: Abbottabad the 19 October 2011.

14

The Chairman,
Khyber Pakhtunkhwa textbook Board Peshawar

Subject: - **MEETINGS OF PROVINCIAL TEXTBOOK REVIEW COMMITTEE FOR THE REVIEW OF
MANUSCRIPTS OF ENGLISH-6th, ISLAMYAT (COMP)-10th AND BIOLOGY-11th.**

Respected Sir,


I am directed to inform that this Directorate has scheduled 03 days PTRC meetings w.e.from 21 to 23 Oct. 2011 (09.00AM to 04.00 PM) at RITE (M) Gul Bahar-II Peshawar to review the manuscripts of the following subjects:

1. English Class-6th 2. Islamyat (Comp) Class-10th 3. Biology Class-11th

Subject wise nominated members of the Committees are -

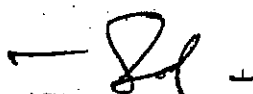
- I. English 6th :**
1. Mr. Qazi Muhammad Naeem, SS, GHSS Bagra Haripur.
 2. Mr. Sher dany Khan AD L&Sec 7/du, Directorate Peshawar.
 3. Mrs. Jamila Danial, Principal GDHSS Lahor Swabi
 4. Mr. Hamidullah, SS, Textbook Board Peshawar
 5. Prof. Bashir Ahmad, Islamia College University.
 6. Mr. Wajid Ali, GHS No. 2 Peshawar city
- II. Islamyat 10th :**
1. Mr. Safdar Rehman, DCTE Abbottabad
 2. Mr. Fazl-e-Wahab, SS, Textbook Board Peshawar
 3. Mr. Abdul Bar, Instructor, RITE (M) Peshawar.
 4. Mr. Muhammad Naeem, TT, GHSS Peshawar
 5. Mr. Qazi Muhammad Aamir, SS, GHSS Bagnetar Abbottabad
 6. Mr. Ahmad Jan, Assistant Professor, GPGC # 2 Abbottabad
- III. Biology 11th :**
1. Mr. Attaullah Khan, Director, DCTE Abbottabad
 2. Mr. Muhammad Waqar, SS, Textbook Board Peshawar
 3. Mr. Azhar Mahmood, Associate Professor, GPGC # 2 Abbottabad
 4. Mrs. Azhar Jan, SS, GHSS Puzanwai Charsadda
 5. Mr. Reimanullah, Lecturer, Peshawar University
 6. Mr. Abrar Ahmad, SS, DCTE, Abbottabad

It is therefore requested that the necessary arrangements with regard to PTRC meetings including the charges according to this Directorate letter No. 4905/DD(A) dated 13.09.2011 may please be made in the light of the above schedule.


(ABRAR AHMAD)
SUBJECT SPECIALIST-II
FOR/ DIRECTOR

CC To:

1. P/S to Secretary, E&SED Khyber Pakhtunkhwa Peshawar.
2. Chairman English Department Islamia College University
3. Chairman Botany Department Peshawar University
4. Executive District Officer E&SE Abbottabad.
5. Executive District Officer E&SE Peshawar
6. Executive District Officer E&SE Swabi
7. Executive District Officer E&SE Charsadda
8. Executive District Officer E&SE Haripur
9. Principal GDGC # 2 Abbottabad
10. All concerned.


(ABRAR AHMAD)
SUBJECT SPECIALIST-II
FOR/ DIRECTOR

DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION KHYBER PAKHTUNKHWA ABBOTTABAD:

No. 6170-85/SS-II.

Dated Abbottabad the

27/8/12

The Chairman,
Khyber Pakhtunkhwa Textbook Board,
Peshawar.

Subject: - **SC MEETINGS FOR REVIEW OF THE MANUSCRIPT OF PHYSICS 10TH, GENERAL SCIENCE 7TH AND ARABIC 7TH.**

Respected Sir,

I am directed to convey your goodself that this Directorate has scheduled SC meetings for the review of mentioned subjects according to the schedule below.

Subject	Date	Timing	Venue
Physics 10 th	w.e.from 29.08.2012 to 31.08.2012	9.00AM to 5:pm	DCTE Abbottabad
General Science 7 th	w.e.from 29.08.2012 to 31.08.2012	9.00AM to 5:pm	DCTE Abbottabad
Arabic 7 th	w.e.from 29.08.2012 to 31.08.2012	9.00AM to 5:pm	DCTE Abbottabad

Subject wise Nominations are:

Physics 10th:

1. Mr. Ghulam Rasool Associate Prof. GPGC No. 1 Abbottabad.
2. Mr. Ahsan Saleem SS GHSS, Bandi Dhundan Abbottabad.
3. Mr. Abrar Ahmad, SS DCTE Abbottabad.
4. Coordinator DCTE Abbottabad
5. Respective Nominee of Khyber Pakhtunkhwa Textbook Board Peshawar.


General Science 7th

1. Mr. Tahir Javed, Principal GHS Sumander Katha.
2. Mr. Younas Khan, Assistant Prof: GPGC, No. 2 Mandian Abbottabad.
3. Mr. Khan Gul Jadoon.SS DCTE, Abbottabad
4. Coordinator DCTE Abbottabad
5. Respective Nominee of Khyber Pakhtunkhwa Textbook Board Peshawar.

Arabic 7th


1. Mr. Ahmed Jan, Assistant Prof: GPGC No. 2 Abbottabad
2. Mr. Qazi Muhammad Aamir, SS-GHSS, Bagnotar
3. Mr. Safdar Ur Rehman, DCTE, Abbottabad
4. Coordinator DCTE Abbottabad
5. Respective Nominee of Khyber Pakhtunkhwa Textbook Board Peshawar.

It is therefore requested that the necessary arrangements of payments to the concerned may please be made accordingly to the given schedule.


SUBJECT SPECIALIST II
DCTE KHYBER PAKHTUNKHWA
ABBOTTABAD

CC to:-

1. P.S to Secretary E&SED Government of Khyber Pakhtunkhwa Peshawar:
2. P.S to Director, E&SE, Khyber Pakhtunkhwa Peshawar with the request to direct the concerned EDOS for nomination as per detail given above.
3. Principal, GPGC # 1 Abbottabad.
4. Principal, GPGC # 2 Abbottabad.
5. Executive District Officer, E&SE, Abbottabad.
6. Principal, GHSS Bandi Dhundan Abbottabad.
7. Principal, GHSS, Bagnotar Abbottabad.
8. All Concerned.


SUBJECT SPECIALIST II
DCTE KHYBER PAKHTUNKHWA
ABBOTTABAD

18

All Nominees.

Subject: **REVIEW MEETINGS**

Sir,

I am directed to inform that this Directorate has scheduled review meetings for the following subjects according to the schedule given below:

S.No	Subject/Class	Review Stage	Publisher	Date	Timing	Venue
1.	Home Economics (E) 8 th	PTRC	UBP	29 Oct-01Nov 2013	9 AM to 4 PM	DCTE, Abbottabad
2.	General Science (E) 4 th	Re-review	TBB	29-31 Oct.2013		
3.	History (Ur) 6 th	-do-	TBB	--do--	--do--	
4.	Islamiyat (Ur) 3 rd	-do-	TBB	--do--	--do--	
5.	Math (E) 6 th	-do-	TBB	--do--	--do--	
6.	Pashto 7 th	-do-	L BP	--do--	--do--	

Subject wise nominees are:

Home Economics (E) 8th

1. Mst. Zaheen Anjum, Assistant Prof. College of Home Economics Peshawar University.
2. Mst. Faryal Yousaf, Lecturer College of Home Economics Peshawar University.
3. Mst. Tahira Jabeen, DCTE, Abbottabad.

4. Mst. Rukhsana Younis, Headmistress GGHS Beeran Gali Abbottabad.
5. Nominees of Textbook Board Peshawar.

General Science (E) 4th

1. Mr. Tahir Javed, Principal GHS Samandar Khatta Abbottabad.

2. Mrs. Azra Shaheen, HM GHSS Trawra Oghi.

3. Mr. Iqbal Khan, PST GPS Muslimabad.

4. Mst. Gul Bibi, DCTE, Abbottabad.

5. Nominees of Textbook Board Peshawar.

History (Ur) 6th

1. Mr. Muhammad Toqeer, Assistant Prof. GPGC Mandian Abbottabad.

2. Mr. Gul Khatab, SS GHSS Bagnotar.

3. Mr. Zia-ur-Rehman, SST GHSS Nawanshehr Abbottabad.

4. Mr. Muhammad Shafiq, SS DCTE Abbottabad.

5. Nominees of Textbook Board Peshawar.

Islamiyat 3rd

1. Mr. Abdul Saboor, Associate Professor GPGC No.1 Abbottabad.

2. Mr. Qazi Muhammad Aamir, SS GHSS Bagnotar Abbottabad.

3. Mr. Muhammad Asim Khan, PST GPS Muslim Town Abbottabad.

4. Mr. Safdar Rehman, DCTE, Abbottabad.

5. Nominee of Textbook Board Peshawar.

Maths 6th (E)

1. Mr. Majid Khan, Lecturer GPGC Mandian Abbottabad.

2. Mr. Javed Akhtar, SS GHSS Bagra Haripur.

3. Mr. Aftab Khan, CT GHSS Bandi Dhundan Abbottabad.

4. Mr. Khan Gul Jadoon, SS DCTE Abbottabad.

5. Nominee of Textbook Board Peshawar.

Pashto 7th

1. Mr. Wazir Zada Assistant Prof. Govt. College Kohat.

2. Mr. Noor ul Amin, SST GHS Shah Mansoor, Swabi

3. Mr. Habib Abid, CT GHS Khanpur Thadinzai Dir (Lower).

4. Mr. Nighat Seema, DCTE, Abbottabad.

5. Nominees of Textbook Board Peshawar.

SUBJECT SPECIALIST-II FOR/DIRECTOR.

CC to:

1. P.S to Secretary E&SED Government of Khyber Pakhtunkhwa Peshawar.
2. P.S to Director. E&SE, Khyber Pakhtunkhwa Peshawar with the request to direct the concerned DEOs for nomination as per detail given above.
3. Principal College of Home Economics Peshawar University.
- 4-5. Principal Govt. Post Graduate College #1 & Mandian Abbottabad.
- 6-8. Principal, GHSS/Nawanshehr, Bagnotar & Bandi Dhundan Abbottabad.
9. Principal, Govt. College Kohat.
- 10-12. District Education Officers (M&F) Abbottabad/Manschra/Dir Lower
- 13-14. Principal GHS Shahmansoor (Swabi) & Khanpur Thadinzai Dir Lower

SUBJECT SPECIALIST-II FOR/DIRECTOR.

DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION

KHYBERPAKHTUNKHWA, ABBOTTABAD

Phone # 0992-382634 FAX # 0992-381527 Email dete-kpk@hotmail.com

ORDER:

No. 1635-69/AD {C & TR} Dated 21.03.2022, The competent authority in the Directorate of Curriculum & Teacher Education Khyber Pakhtunkhwa Abbottabad is pleased to nominate the following subject / curriculum experts for review of Single National Curriculum (SNC) for Grades VI-VIII (developed by MoFEPT Islamabad) w.e.f 24th March to 28th March 2022 (9:00 am to 4:00 pm) at Khyber Pakhtunkhwa Textbook Board Peshawar.

Group	Name, Designation & Address	Subject
1.	Mr. Inam Ullah Khan, Desk Officer DCTE Abbottabad Muhammad Saeed, SS GHSS No. 1 Haripur Muhammad Abdul Basir, SS GHSS Mohar Mansehra Ms. Shazia Saleem, HM GGHS Behra Haripur	English
2.	Taj Wali Khan, Desk Officer DCTE Abbottabad Dr. Muhammad Imtiaz, Associate Professor GPGC No. 1 Atd Dr. Asad Qayyum, SS GHSS Nawanshehr Abbottabad Mr. Munsif Ali, SS GHSS Khesghi Payan Nowshera Muhammad Ayub, SS GHSS Kabgani Swabi	Urdu
3.	Mr. Abbass Khan, SS DCTE Abbottabad Mr. Abdul Salam, Principal GHS Kokal Barseen Abbottabad Mr. Ehtisham Gul, Assistant Professor GPGC Mandian Abbottabad Mr. Munisf Ali, SS GHSS Khesghi Payan Nowshera	Mathematics
4.	Mr. Babur Bashir, Desk Officer DCTE Abbottabad Muhammad Hanif, SS GHSS Nawanshehr Abbottabad Mr. Shahid Hussain, Lecturer GPGC Mandian Abbottabad Mr. Jan e Alam, SS GHSS Jalozai Nowshera	History
5.	Mr. Hamid Khan, Desk Officer DCTE Abbottabad Dr. Rabi Azhar, AP GPGC No. 1 Abbottabad Ms. Saira Tanoli, Lecturer GPGC No.1 Abbottabad Mr. Habib Ur Rehman, SS GLZWSHSS Bareela Haripur	Geography
6.	Ms. Shabana Shaheen, Desk Officer DCTE Abbottabad Dr. Muhammad Javed, Pricipal GHS Kakul Abbottabad Mr. Sohail Zeb, SAT GHS Kokal Barseen Abbottabad Qazi Muhammad Amir, Principal GHS No. 1 Havelian Abbottabad	Islamiyat
7.	Dr. Gul Nazir Khan, Desk Officer DCTE Abbottabad Dr. Imtiaz Ali, SS DCTE Abbottabad Mr. Hashmat Ali, SS GHSS Sherpao Charsada Dr. Ibrahim, SS GHSS Tarnab Charsadda Dr. Ibrahim, SS GHSS Tarnab Charsadda	General Science
8.	Mr. Sufian Matloob, Desk Officer DCTE Abbottabad Mr. Salahuddin Ayubi, AP GPGC No. 1 Abbottabad Muhammad Khalid, SS (IT) GHSS Hazarkhwani Peshawar Mr. Sajid Saleem, SST (IT) GHS Shinkiari Mansehra	Computer Science
9.	Mr. Husnain Mohavia, J/C DCTE Abbottabad Mr. Ibn I Amin, J/C DCTE Abbottabad Muhammad Sayyam, J/C DCTE Abbottabad	Composers

NOTE:

1. Director DCTE and Additional Director (C & TR) will participate for the necessary decision & feedback on their convenience.
2. Representatives of KP TBB in each group will participate as observer.

TOR:

1. To contextualize the curriculum in the provincial context with proper justification.
2. To finalize document in both soft/hard on the closing day.

DIRECTOR

Copy for information and necessary action to:

1. Secretary, E & SED Government of Khyber Pakhtunkhwa Peshawar.
2. Chairman, Khyber Pakhtunkhwa Textbook Board Peshawar with request for necessary arrangements.
3. Director, Higher Education, Archives and Libraries Govt. of Khyber Pakhtunkhwa Peshawar.
4. Director DPD Khyber Pakhtunkhwa Peshawar.
5. DEO(M) Abbottabad, Mansehra, Swabi, Nowshera, Peshawar, Charsada & DEO(M/F) Haripur.
6. Principals concerned Schools and Colleges.



**DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION
KHYBER PAKHTUNKHWA ABBOTTABAD**

Phone # 0992-382634 | Fax # 0992-381527 | Email dcte-kpk@hotmail.com

ORDER

No. 1635-69/AD (C&TR) Dated 21.03.2022. The competent authority in the Directorate of Curriculum & Teacher Education Khyber Pakhtunkhwa Abbottabad is pleased to nominate the following subject / curriculum experts for review of Single National Curriculum (SNC) for Grades VI-VIII (developed by MoFEPT Islamabad) w.e.f 24th March to 28th March 2022 (9:00 am to 4:00 pm) at Khyber Pakhtunkhwa Textbook Board Peshawar.

Group	Name, Designation & Address	Subject
1.	Mr. Inam Ullah Khan, Desk Officer DCTE Abbottabad Muhammad Saeed, SS GHSS No.1 Haripur Muhammad Abdul Basit, SS GHSS Mohar Manshra Ms. Shazia Saleem, HM GGHS Behra Haripur	English
2.	Taj Wali Khan, Desk Officer DCTE Abbottabad Dr. Muhammad Imtiaz, Associate Professor GPGC No.1 Atid Dr. Asad Qayyum, SS GHSS Nawanshehr Abbottabad Muhammad Ayub, SS GHSS Kabgani Swabi	Urdu
3.	Mr. Abbass Khan, SS DCTE Abbottabad Mr. Abdul Salam, Principal GHS Kokal Barseen Abbottabad Mr. Ehtisham Gul, Assistant Professor GPGC Mandian Abbottabad Mr. Munsif Ali, SS GHSS Khesghi Phyan Nowshera	Mathematics
4.	Mr. Babur Bashir, Desk Officer DCTE Abbottabad Muhammad Hanif, SS GHSS Nawanshehr Abbottabad Mr. Shahid Hussain, Lecturer GPGC Mandian Abbottabad Mr. Jan e Alam, SS GHSS Jalozai Nowshera	History
5.	Mr. Hamid Khan, Desk Officer DCTE Abbottabad Dr. Rabi Azhar, AP GPGC No.1 Abbottabad Ms. Saira Tanoli, Lecturer GPGC No.1 Abbottabad Mr. Habib Ur Rehman, SS GLZWSHSS Bareela Haripur	Geography
6.	Ms. Shabana Shaheen, Desk Officer DCTE Abbottabad Dr. Muhammad Javed, Principal GHS Kakul Abbottabad Mr. Sohail Zeb, SAT GHS Kokal Barseen Abbottabad Qazi Muhammad Amir, Principal GHS No. 1 Havelian Abbottabad	Islamiyat
7.	Dr. Gul Nazir Khan, Desk Officer DCTE Abbottabad Dr. Imtiaz Ali, SS DCTE Abbottabad Mr. Hashmat Ali, SS GHSS Sherpao Charsadda Dr. Ibrahim, SS GHSS Tamah Charsadda	General Science
8.	Mr. Sufian Matloob, Desk Officer DCTE Abbottabad Mr. Salahuddin Ayubi, AP GPGC No.1 Abbottabad Muhammad Khalid, SS (IT) GHSS Hazarkhwani Peshawar Mr. Sajid Saleem, SST (IT) GHS Shinkhari Mansehra	Computer Science
9.	Mr. Husnain Mohavia, J/C DCTE Abbottabad Mr. Ibn i Amin, J/C DCTE Abbottabad Muhammad Sayyam, J/C DCTE Abbottabad	Composers

NOTE:

1. Director DCTE and Additional Director (C&TR) will participate for the necessary decisions & feedback on their convenience.
2. Representatives of KP TBB in each group will participate as observer

TOR:

1. To contextualize the curriculum in the provincial context with proper justification.
2. To finalize document in both soft/hard on the closing day.

Copy for information and necessary action to:

1. Secretary, E&SED Government of Khyber Pakhtunkhwa Peshawar
2. Chairman, Khyber Pakhtunkhwa Textbook Board Peshawar with request for necessary arrangements
3. Director, Higher Education, Archives and Libraries Govt of Khyber Pakhtunkhwa Peshawar
4. Director DPD Khyber Pakhtunkhwa Peshawar
5. DEO (M) Abbottabad, Manselri, Swabi, Nowshera, Peshawar, Charsadda & DEO(M/F) Haripur
6. Principals concerned Schools and Colleges

DIRECTOR

Annexure C,

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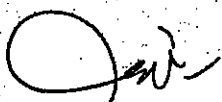
**DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION
KHYBER PAKHTUNKHWA, ABBOTTABAD
PHONE # 0992-382634 FAX# 0992-381527**

ORDER:

No.2259-63/SNC-22/SC/NCC Dated: 26.04.2022:- The Directorate of Curriculum & Teacher Education (DCTE) Khyber Pakhtunkhwa Abbottabad, being the Competent Authority has been pleased to nominate the following curriculum/ subject experts for the Select Committee (SC) Review Meeting for review of Model Textbooks based on SNC 2022 developed under NCC. The review will be conducted at National Curriculum Council (NCC), Islamabad w.e.f 27.04.2022 to 28.04.2022 (10:00 AM – 04:00 PM) under specified terms and conditions mentioned in KP TLM Policy 2017.

S. #	Subject-Grade	Nominees of the Review Committee
1.	Islamiat Grade VI	Muhammad Abdullah AT GMS Taror Abbottabad Sada Hussain Alvi TT GMS Kasaki Abbottabad Shabana Shaheen, Desk Officer DCTE KP Abbottabad Representative of KP TBB Peshawar
2.	Islamiat Grade VII	Qazi Muhammad Aamir Khan ,Principle GHS No. 1 Havelian Atd Murad Gul , TT GMS,Kangar Maira s, Abbottabad Shabana Shaheen, Desk Officer DCTE KP Abbottabad Representative of KP TBB Peshawar
3.	Islamiat Grade VIII	Dr. Muhammad Javed , Principle GHS, Kakool Abbottabad Muhammad Aamir , SST GHS Ghambbeer Abbottabad Shabana Shaheen, Desk Officer DCTE KP Abbottabad Representative of KP TBB Peshawar

You all are, therefore, requested to attend the review proceeding as per schedule given above and in light of E&SE Deptt. Letter No.SO (SM) E&SED/12-1/2019/Misc. Dated Peshawar the. October 10, 2019.


(SYED AMJAD ALI)
Additional Director (C&TR)

Copy forwarded for information to the:

1. Secretary to the Government of Khyber Pakhtunkhwa, E&SE Department Peshawar
2. District Education Officer (M/F) concerned
3. All principal concerned
4. All Nominees
5. PS to Director local office

-Sd-
Additional Director (C&TR)

Annexure D



DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION
KHYBER PAKHTUNKHWA ABBOTTABAD
Phone # 0922-382634 Fax # 0922-381527 Email: director.dcte@kncpe.gov.pk

ORDER

2

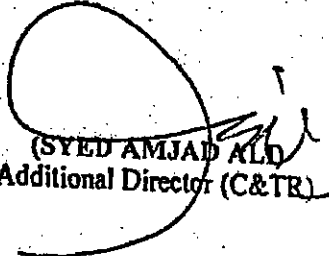
No. 4385-88/AD (C&TR) Dated 22.09.2022:- In pursuance to the E&SE Department Notification No. SO(B.T)/11-13/SS-ISLAMIYAT/TBB Peshawar dated 22.09.2022 and with reference to this Directorate letters No. 2176-96 dated 21.04.2022 and No. 2259-63 dated 26.04.2022, the following members of PTRC and SC review for the textbook of Islamiyat for Grade-VII are hereby directed to immediately report to Ms. Shabana Shaheen, SS DCTE to examine the review record and conformity of the errors/mistakes identified by E&SE Department and submit the report within two (02) days positively.

1. Qazi Muhammad Aamir Khan, Principal GHS No. 1 Havellan Abbottabad
2. Mr. Murad Gul, AT GHS, Kangar Maira, Abbottabad
3. Mr. Rajab Ali SST, GHS No. 1 Abbottabad
4. Mr. Sajid ur Rehman, Desk Officer KP TBB Peshawar

Copy forwarded for information to the:

1. Secretary, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar
2. Chairman, Khyber Pakhtunkhwa Textbook Board, Peshawar
3. All nominees
4. P.S to Director, Local Directorate

DIRECTOR


(SYED AMJAD ALI)
Additional Director (C&TR)

23

Annexure E



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. 50 (B/T) E&SB/TB/11-13/SS-Islamiyat
Dated Peshawar the, 08.12.2022

To

Qazi Muhammad Arif Khan,
Principal (BS-15), GHS No.1 Havellyan, Abbottabad.

Subject: - **SHOW CAUSE NOTICE.**

I am directed to refer to the subject noted above and to enclose herewith a copy of Show Cause Notice wherein the Competent Authority (Chief Minister Khyber Pakhtunkhwa) has tentatively decided to impose upon you major penalty of "Dismissal from Service" under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 in connection with the charges leveled against you.

2. You are therefore directed to furnish your reply to the Show Cause Notice as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

3. Your reply should reach this Department within Seven (07) days of delivery of this letter, otherwise ex-parte action shall be taken against you.

Encl: As Above:


SECTION OFFICER (B/T)

Endst: Even No. & Dates

Copy of the above is forwarded to the: -

1. Chairman, KP-Textbook Board, Peshawar.
2. Director E&SB Khyber Pakhtunkhwa, Peshawar.
3. Director DCIB, Khyber Pakhtunkhwa, Abbottabad.
4. Section Officer (School Male), E&SB Department.
5. PS to Secretary E&SB Khyber Pakhtunkhwa, Peshawar.
6. PS to Special Secretary E&SB Department.
7. PA to Addl. Secretary (Gen), E&SB Department.
8. PA to Deputy Secretary (Boards & Training), E&SB Dept.


SECTION OFFICER (B/T)

SHOW CAUSE NOTICE

I, Mahmood Khan, Chief Minister, Khyber Pakhtunkhwa as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you, Qazi Muhammad Amir Khan, Principal (BS-19) Govt. High School No.1, Haveliyan, Abbottabad as follows:

- i. You being reviewer were main responsible to point out and correct the mistake and error i.e. writing Hazrat Abubakar (RA) second Khalifa instead of 1st Khalifa in the Class-7th textbook of Islamiat Page-10 (Line No.4).
- ii. You being reviewer, neither raised any objection on the fresh and modified two lines nor bothered to correct the blunder in the textbook of Islamiat for Class-7th i.e. revelation has been shown stopped after bestowing Prophet hood on the Hazrat Muhammad (P.B.U.H).
- iii. You failed to identify and correct the mistakes i.e. Syedna Imam Hussain (R.A) was written instead of Syedna Imam Hassan (R.A) in the textbook of Islamiat for Class-8th (Page-97 Line No.15).
- iv. You being reviewer were responsible of the insertion of the phrase or clause, which is not advisable for the students of Class-4th.
- v. You being reviewer did not observe that a lesson on Ghazi Aleem-ud-Din was present in the textbook of Class-7th published in academic year 2021-22 but the same is missing in the new edition i.e. for academic year 2022-23.
- vi. Due to your this act of negligence, the Government was put in very awkward situation in the eyes of public and resources consumed on the correction of these mistakes.

I am satisfied that you have committed following acts/ omissions specified in rule-3 of the said rules:-

- i. Inefficient
- ii. Misconduct

2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a show cause notice under Rule-7 of the ibid rules.

3. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011:-

a) Dismissal from Service

4. You are, therefore required to show cause as to why the aforesaid penalty / penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within fifteen (15) days of its delivery, it shall be presumed that you have no defense to put in, and in that case an ex-parte action shall be taken against you.

(MAHMOOD KHAN)
CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY

Annexure F,

25

To

6

The Secretary
E&SE, Khyber Pakhtunkhwa

Subject: REPLY OF THE SHOW CAUSE NOTICE

Respected Sir,

I solemnly declare that I belong to a notable religious family, having a firm belief in "الدين". I do affirm that I have a vast experience of Text Books reviews and remained a member of Provincial Text Book Review Committee for years and (by the grace of Almighty) never been accused or charged for errors or mistakes, that proves my efficiency/competency in the subject. Unfortunately, on 08/12/2022, I have been served a show cause notice for review of Model Textbook Grade 7 based on SNC 2022 developed under NCC (Annexure A), from your honour on my "inefficiency and misconduct". Keeping in view, the review was made on "war footing" basis and according to KPTLM Policy actual number of days of PTRC were reduced from 12 to 4.

Now with reference to your letter No. SO(B/T)E&SED/TBB/11-13/SS-Islamiyat dated: 08-12-22 a Para-wise response as under Para-wise rebuttal is submitted for your kind consideration:

1. THE CHARGES AT PARA I, II OF SHOW CAUSE: (Annexure B)

CHARGE AT PARA I. You being reviewer were main responsible to point out and correct the mistake writing HAZRAT ABUBAKAR (RA) SECOND KHALIFA INSTEAD OF 1st KHALIFA in the class 7 textbook of Islamiyat page 10 (line no 4).

CHARGE AT PARA II. You being reviewer neither raised any objection on the fresh and modified two lines nor bothered to correct the blunder in the textbook of Islamiyat for class 7th i.e. revelation has been shown stopped after bestowing prophet hood on HAZRAT MUHAMMAD (P.B.U.H).

REPLY OF THE AFORESAID CHARGES

The errors were not present in the manuscript reviewed by the Provincial Textbook Review Committee (PTRC). Apparently, the aforementioned material was incorporated by the publisher on its own. (Annexure Ci & Cii)

HENCE THE THE UNDERSIGNED SHOULD NOT BE HELD RESPONSIBLE ON THE ACT OF PUBLISHER.

2. CHARGE AT PARA III. You failed to identify and correct the mistakes i.e. SYEDNA IMAM HUSSAIN (R A) was written instead of SYEDNA IMAM HUSSAIN (RA).

REPLY OF THE CHARGE:

Not Applicable as the charge is irrelevant (Annexure D)

HENCE THE THE UNDERSIGNED SHOULD NOT BE HELD RESPONSIBLE ON THE ACT OF PUBLISHER.

3. **CHARGE AT PARA IV:** You being reviewer were responsible of the insertion of the phrase or clause which is not advisable for the students of class 4th

REPLY OF THE CHARGE:

First Text Book Test Edition was free from the controversial sentence. The sentence was added in the Second Edition without any recommendation of RTRC (Annexure E1&E2)

HENCE THE THE UNDERSIGNED SHOULD NOT BE HELD RESPONSIBLE ON THE ACT OF PUBLISHER.

4. **CHARGE AT PARA v:** You being reviewer did not observe that a lesson on Ghazi Aleem- ud-DIN was present in the Textbook of class 7 published in academic year 2021-22 but the same is missing in the new edition i.e. for academic Year 2022-23.

REPLY OF THE CHARGE:

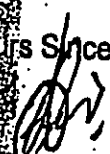
Not Applicable as Ghazi Aleem-ud- Din Shaheed is not the part of the textbook of Islamiyat. (Annexure F)

HENCE THE THE UNDERSIGNED SHOULD NOT BE HELD RESPONSIBLE ON THE ACT OF PUBLISHER.

Moreover, the Text Book of Islamiyat grade 7 for 2022-23 is a TEST EDITION with text book feedback form which implies that this Text Book has been printed for ONE Year

In the light of aforementioned facts, it is obvious that neither it was a wilful act of violation nor negligence on the part of undersigned. It is therefore penalty is prayed not to be imposed upon the undersigned, who is not responsible for the mistakes/blunders with the desire to be heard in person, if required.

Yours Sincerely,


QAZI MUHAMMAD AAMIR KHAN
PRINCIPAL
GHS No 1 HAVELIAN

Annexure, G,

MOST IMMEDIATE



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat Peshawar.

No. SO(C&T)E&SE/11-1/TBB/Gen/Vol-II
Dated Peshawar the 02.02.2023

To

The Chairman,
KP-Textbook Board,
Phase-V Hayatabad, Peshawar.

Attention:

Secretary
KP-Textbook Board,
Phase-V Hayatabad, Peshawar.

SUBJECT:

INITIATION OF DISCIPLINARY PROCEEDINGS AGAINST THE OFFICERS OF E&SE DEPARTMENT ON ACCOUNT OF SERIOUS MISTAKES AND ERRORS IN THE TEXTBOOKS OF ISLAMIYAT FOR CLASSES 4TH & 5TH FOR THE ACADEMIC YEAR 2022-23.

Dear Sir,

I am directed to refer to the subject cited above and to enclose herewith a copy of letter No. SO(C&T)1-S/Misc/2022/1376-77 dated 30-01-2023 received from Culture, Tourism, Archaeology & Museums Department which is self-explanatory, with the request to inform the following officer to appear before the Secretary Culture, Tourism, Archaeology & Museums Department for personal hearing on 09-02-2023 at 11:00 AM in his office.

Sr	Name	Designation
1	Qazi Muhammad Amir Khan,	Principal GHS No.1 Haveliyan, Abbottabad
2	Mr. Murad Gul,	Islamiyat Teacher GHS, Kangarh Mera, Abbottabad
3	Mr. Rajah Ali,	SST GHS No.1 Abbottabad
4	Mrs. Shabana Shaheen,	Desk Officer, DCTE KP Abbottabad
5	Dr. Sajid-ud-Rehman,	SS Islamiyat KP -Textbook Board

It is, therefore, requested that a well conversant officer not below the rank of (BPS-17) may be deputed to attend the said personal hearing alongwith relevant record to assist the officer during inquiry proceeding positively, please.

Yours Faithfully,

(TAJ MUHAMMAD)
SECTION OFFICER (B&T)

Ends: of even No. date.

Copy is forwarded for information:-

1. Director DCTE Abbottabad.
2. Section Officer (Male) E&SE Deptt.
3. P.S to Secretary E&SE Department.
4. P.A to Additional Secretary (Gen) E&SE Department.
5. PA to Deputy Secretary (B&Trg), E&SE Department.

08/02/2023
SECTION OFFICER (B&T)

Annexure 1

(P)

The Worthy Chief Minister of Khyber Pakhtunkhwa,
(The Competent Authority)

10/A


SUBJECT: PLEA FOR REVIEW /RECONSIDERATION OF THE PENALTY AS ENFORCED VIDE NOTIFICATION NO. SO(B&T)E&SE/11-13/SS Islamiyat/TBB/26. DATED PESHAWAR THE, 19th October 2023 (WITH HOLDING TWO ANNUAL INCREMENTS FOR TWO YEARS)

Honourable Sir,

With reference to above mentioned penalty implemented through your exclusive prerogatives, it is humbly solicited to compassionately reconsider the said penalty (Annexure-2) on the following charges (Annexure-3):

Charge at Para i: It has been alleged that I, as a reviewer, was primarily responsible for pointing out and correcting an error regarding the attribution of Hazrat Abubakar (RA) as the 2nd Kalifa instead of the 1st Khalifa in the Class 7 textbook of Islamiyat on page 10, line 4.

Charge at Para ii: Another accusation is that, as a reviewer, I neither raised an objection on the fresh and modified two lines nor corrected an error in the Class 7 Islamiyat textbook. This error pertained to portrayal of the revelation as having stopped after bestowing prophet-hood on Hazrat Muhammad ﷺ. (Annexure-4):

Charge at Para iii: It has been alleged that I failed to identify and correct mistake, specifically the use of 'Sydna Imam Hussain' instead of the correct form 'Syedna Imam Hassan' in the textbook of Islamiyat for Class 8.

Charge at Para iv: I have also been charged with inserting a phrase or clause that is not advisable for students of Class 4th in the textbook.

Charge at Para v: The final charge against me is related to my failure to notice the omission of a lesson on Ghazi Aleem-ud-Din in the new edition of the Class 7 textbook of Urdu, which was included in the previous academic year (2021-22) but is missing in the new edition for academic year 2022-23.

⇒ I would like to clarify that the first two charges are baseless. The sentences in question were not present in the original manuscript provided to the Reviewers but were included after review by the publisher, Afaq, who added additional materials on its own without the prior permission and knowledge of Reviewers, the concerned authority. But instead of holding the publisher responsible for this wilful violation of rules, I was used as scapegoat for the trespass of the publisher. (original i.e reviewed manuscript is Annexure-5) As a reviewer, my responsibility was to evaluate the content in the manuscript, and I had no control over such alterations made by the publisher. Therefore, holding me guilty for these charges is unfair and unjust.

➤ Moreover, the other three charges are not within the purview of a reviewer's responsibilities (as evidenced by Annexure 1). which clearly outlines the scope of the reviewer's role.

30

[Handwritten signature]

10(B)

It is therefore, the minor penalty imposed on me in light of these allegations is entirely unjust and unfair. I kindly request that this penalty be reconsidered and lifted in light of the information presented in this appeal. I believe that it is imperative to ensure fairness and transparency in such matters.

I have always held my duty as a reviewer in high regard and have strived to contribute positively to the quality of educational materials. I hope that this appeal will receive your prompt and fair consideration, and that justice will prevail.

Keeping in view the above-mentioned facts, it is humbly implored to waive off /review the said penalty and oblige.

Thank you for your time and attention to this matter.

Yours sincerely,

27/8/11/2023

[Handwritten signature]

QAZI MUHAMMAD AAMIR KHAN
Principal
Govt; High School No.1 Havelian
Abbottabad

31

Annexure J

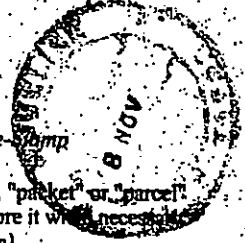
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DBA NO. 784 TBA NO. _____

BC No.

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وکالت نا

Annexure K

R.s.200/=

Ch Muhammad Naseem
Finance Secretary
District Bar Association
Abbottabad

جناب منسٹر جنرل KPK ایسٹاڈ

بعدالت

تاج محمد عامر خان

عنوان:

Service Tribunal

Appellant

مجاناب:

باعث تحریر آئنگے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ایسٹاڈ کے لیے

کو حسب ذیل شرائط پروکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پچھلے یا بروقت تھکیل پیروی کرنے سے پہلے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ ساعت ہونے پر یا بروقت تھکیل یا کچہری کے اوقات سے پہلے پہنچنے پہنچنے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا محتاطی کے راجس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجرا لینے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ناشی وراثی نامہ و فیصلہ بر حلف کرنے اتنا ہی دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے پیر و نجات از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا صرفہ درخواست حکم اختتامی ماترقی یا گرفتاری قبل از گرفتاری واجرا نے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختار پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وسیلے کی کوئی بھی چھاپے یا اپنے نام پر یا اپنے نام پر مقرر کریں اور ایسے وکس کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔ مورخہ: 2024/02/07
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

نوٹ: وکالت نامہ کی نوٹوں کا پی قابل قبول نہ ہوگی

Acceptance
Signature

Dazi Muhammad Amir Khan (Appellant)



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**



Service Appeal No: _____ of 2024

Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan,
Principal, GHS No 1 Havelain, Abbottabad.

Appellant

Murad Gul S/O Glzar, Arabic Teacher, GMS Galdhok (Boys),
Abbottabad.

Appellant

Versus

The Chief Minister through Principal Secretary to Chief Minister
Government of Khyber Pakhtunkhwa, Peshawar and others.

Respondents

SERVICE APPEAL

POWER OF ATTORNEY

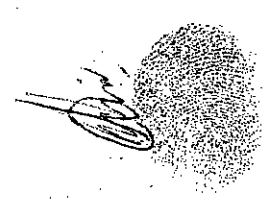
NAME & OTHER PARTICULARS OF ATTORNEY

**Mr Rashid Iqbal Khan Jadoon Advocate Islamabad Bar Islamabad,
Abbott Law Chamber Office No 6, Ayub Tanoli lawyer plaza Abbottabad.**

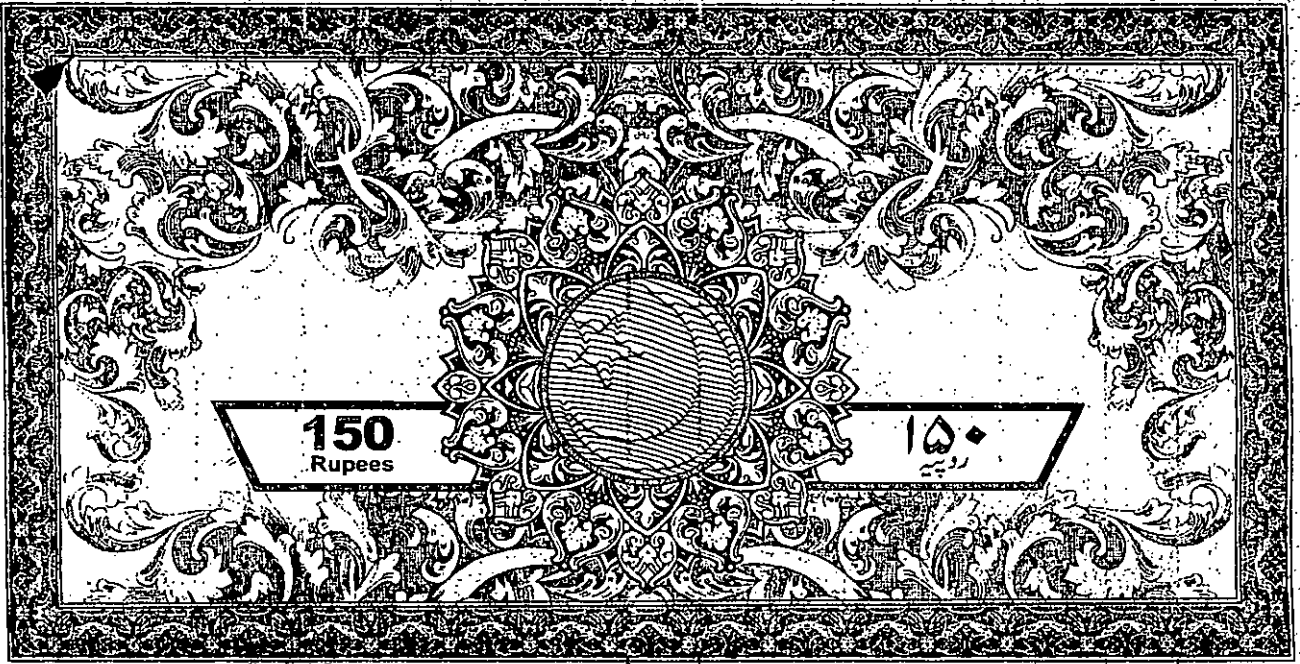
0333-5025002, 0316-9343818, CNIC No 13101-0944593-9.

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M. P. S.
 Ministry of Education




We, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, Murad Gul S/O Glzar, Arabic Teacher, GMS Galdhok (Boys), Abbottabad, deponent, do hereby solemnly affirm and declare on oath that we appoint **above named** as attorney to act on our behalf to appear, plead for us in the titled case in which the same may be tried or heard and any other proceedings arising out of or connected herewith and he would be competent to exercise all the powers which we ourself holds as appellants, he is authorized all powers, to institute case, to submit any kind of application or reply, argue the case, in short, all powers or authority which we are entitled being petitioner, would be transferred to above named attorney through instant power of attorney.

Sworn at Abbottabad Dated this 7th day of February, 2024.


(Qazi Muhammad Aamir Khan)
Appellant

CNIC No 13101-0829865-1

DEPONENT


(Murad Gul S/O Glzar)
Appellant

CNIC No 13101-3399367-7

DEPONENT

