

FORM OF ORDER SHEET

Court of _____

Appeal No. 324/2024

S.N	Date of original proceedings	Order or other proceedings with signature of judge
1	2	3

27/02/2024

The appeal of Mr. Murad Gul 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

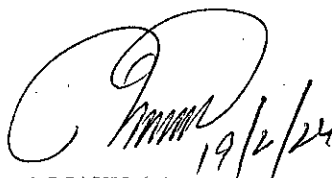

REGISTRAR

The appeal of Mr. Murad Gul received today i.e on 16 .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. ~~1, 2, & 3~~ are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.
- 2- Page no. 14 of the appeal is illegible which may be replaced by legible/better one.

No. 377 /S.T.

Dt. 19/2 /2024.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


~~Shahzad Shakoor Adv.
High Court A.Abad.~~

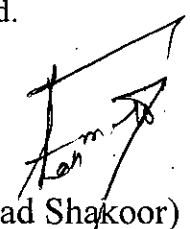
Resubmitted with the remarks/reply Para-wise as under.

- 3) That all the three respondents impleaded in service appeal are proper and necessary parties and their role in the proceedings of the event based on issuance of impugned order is important and documents in appeal annexed as Annexures "D" "G" & "H" supports such claim, and 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, did not applicable in this scenario, In future if any of them would be deemed unnecessary then under the Tribunal Orders it may be deleted as improper or unnecessary.
- 4) That better copies of pages No 14 is prepared and also compiled under page No 14(a).

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
S.T Peshawar

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Service Appeal No: 329 of 2024

Murad Gul S/O Gulzar, 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

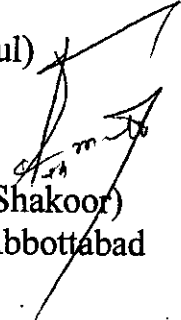
INDEX

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of Service Appeal with affidavit	---	1 to 6
2	Copies of NTS result, appointment Order dated 27/04/2020, Order dated 10/06/2020 with charge report ,and Notification issued by Department, issued on 13/12/2022	A	7 to 13
3	Copies of orders dated 21/04/2022 & 26/04/2022 issued by DCTE.	B	14 to 15
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5	Copy of Show Cause Notice dated 08/12/2022, issued by respondent No 2	D	17 to 18
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8	Copy of Impugned Notification Dated 19/10/2023 issued by respondent No 2.	G	22
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11	Wakalatnama/Power of attorney	K	27 to 29

Dated 20/02/2024


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

Through


(Shahzad Shakoor)
Advocate High Court Abbottabad

(1)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: 324 of 2024

Murad Gul S/O Gulzar, Arabic Teacher, GMS Galdhok (Boys),
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.
- 3 The District Education Officer, Elementary & Secondary Education Department, (Male) Abbottabad.

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/18 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/18 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 joined Education Department as Arabic Teacher through NTS in the year 2019, and after issuance of appointment Order dated 27/04/2020 read with Order dated 10/06/2020, appellant took his charge on 11/06/2020, and now his services are regularized on the basis of Act 2022, and Notification issued by Department, issued on 13/12/2022, and presently appellant is serving in the same capacity of AT in GMS Galdhok Abbottabad. Copies of NTS result, appointment Order dated 27/04/2020, Order dated 10/06/2020 with charge report, and Notification issued by Department, issued on 13/12/2022 are annexed as Annexure "A"
- 2) That Director, Directorate of Curriculum and Teaching Education, Khyber Pakhtunkhwa Abbottabad (DCTE) issued an order dated 21/04/2022 wherein appellant 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 Islamiyat-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 (DCTE) are annexed as Annexure "B".
- 3) That factually the new educational session starts from 1st April of every year, but (DCTE) 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 (DCTE) (6. PTRC, 7.

Select Committee, 8. NOC) and they were also responsible for their work.

- 4) That after completing the Model Textbook Islamiyat of class 07th (Grade VII) (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 "C"
- 5) That after passing three months, respondent No 1 issued Show Cause Notice through letter issued by respondent No 2 on 18/12/2022, appellant submitted his reply to the Show Cause Notice. Copies of said Notice and reply are annexed as Annexure "D" & "E"
- 6) That respondent No 02 wrote a letter dated 02/02/2023 to The Chairman, Khyber Pakhtunkhwa Textbook Board, Peshawar 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 "F"
- 7) 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 "G"
- 8) That the same impugned order dated 19/10/2023, was never communicated to appellant, and impugned order dated 19/10/2023 came in to the Knowledge of appellant on 10/11/2023 and appellant

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preferred departmental appeal against the impugned Notification dated 19/10/2023, before respondent No 1 through registered post dated 20/11/2023, (While officially appellant was informed through letter dated 27/01/2024 issued by respondent no 3) the said Departmental appeal is not decided yet with in 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 letter dated 27/01/2024, Departmental Appeal along with registered receipt, is annexed as Annexure "H" "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 in the present case, appellant was deputed and nominated to the extent of review of textbooks of class VII, but surprisely responsibilities of others, illegally and arbitrarily attributed upon appellant to save the skin of their

(S)

favourite children, as class 4th, Islamiat 8th, Urdu 7th did not relate impugned process.

- d) 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.
- e) 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.
- f) 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 dated 21/04/2022 & dated 22/09/2022.
- g) 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.
- h) 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

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powers in refusing the factual and legal relief to the appellant.

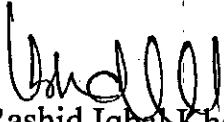
It is, therefore, respectfully prayed that on acceptance of instant service appeal, Impugned Notification No. SO(B&T)E & SE/11-13/SS Islamiyat/TBB/18 Dated Peshawar The, 19TH October.2023 Issued by (Respondent No 2) may please be set aside and acceptance of pending departmental appeal and consequential 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 20/02/2024



(Murad Gul)
Appellant

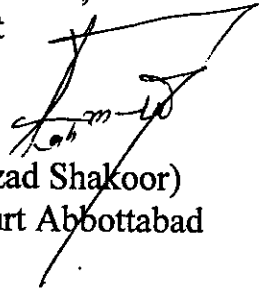


(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad

Through

Attorney Abbottabad.
Abbott Law Chamber

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



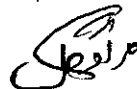
(Shahzad Shakoor)

Advocate High Court Abbottabad

AFFIDAVIT

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

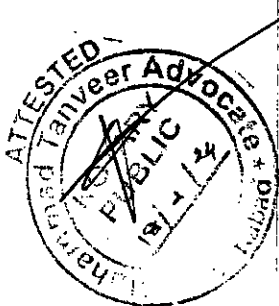
Dated 20/02/2024



(Murad Gul)
Appellant

CNIC No 13101-3399367-7

DEPONENT



Annexure A

7

NTS™

National Testing Service - Pakistan
Building Standards in Educational and Professional Testing

Elementary and Secondary Education Department
Govt of Khyber Pakhtunkhwa
(Screening Test)

AT(BPS-15), QARI/QARIA(BPS-12), SST CHEMISTRY BIOLOGY(BPS-16), SST IT(BPS-16), SST MATH PHYSICS(BPS-16) & TT(BPS-15)

Test Held on: Saturday 3rd & Sunday 4th August, 2019

(Result)

Search Result for the keyword " 1310133993677 "

Roll No	Name	Father Name	CNIC	Post	NTS Marks
111100250	MURAD GUL	GULZAR	13101-3399367-7	AT(BPS-15)	74
Roll No	Name	Father Name	CNIC	Post	NTS Marks
112200016	MURAD GUL	GULZAR	13101-3399367-7	TT(BPS-15)	78

If you have any objection regarding your NTS marks, you are required to submit the Objection / Claim form at Plot # 96, Street # 4, H-8/1, Islamabad or Send "Objection form" through Fax to the following Fax Number +92-51-8444964 before Monday, 26th August 2019 (till 03:00 PM).

"Click Here to Download Objection Form"

No Objection / Claim form will be accepted after, Monday, 26th August 2019 (till 03:00 PM).

Current Date / Time: Monday 26th, August 2019 , 11:41:49 AM

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[Signature]

PHONE & FAX: 0992-9310102

EMAIL ADDRESS: EMISA00TABBAD@YAHOO.COM

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the vacant posts of Arabic Teachers, School based, in BPS-15 (16120-1330-56020) @ Rs. 16120/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:

S#	Roll No	Name	Father's Name	Date Of Birth	CNIC	Merit/Score	Place of Posting	Remarks
1	111100041	MUHAMMAD ISHAQ	QARI ABDUL BASIT	01-05-1993	13102-0348202-5	133.68	GMS Nara	Against Vacant Post
2	111100267	MUSLIM AQEEL	MUHAMMAD MUSI ITAQ	01-05-1993	13101-3207116-5	133.52	GHS Phallah	Against Vacant Post
3	111100067	ZAHEER YOUNAS	MUHAMMAD YOUNAS	10-04-1985	13101-8716020-5	131.61	GMS Dabban	Against Vacant Post
4	111100250	MURAD GUL	GUIZAR	17-05-1993	13101-3399367-7	130.12	GMS Kangar Maira	Against Vacant Post
5	111100064	FAKIR HUSSAIN	AURANGZEB KHAN	10-02-1984	13101-7169638-1	128.78	GHS Namli Maira	Against Vacant Post
6	111100199	MALIK KAMRAN ALI	MALIK MUHAMMAD ASHRAF	29-01-1991	54400-8261305-5	128.59	GMS Kanger Payeen	Against Vacant Post
7	151100086	MUHAMMAD ASIF	GHULAM HUSSAIN	08-08-1990	13101-3187083-9	128.52	GHS Lakhala	Against Vacant Post

TERMS & CONDITIONS:

1. The appointees will take over charge of their posts within 15 days after opening of schools by the Provincial Government as presently all the schools have been closed vide Notification issued by E&SE Department Khyber Pakhtunkhwa Peshawar No. NO.50(G)/E&SED/1-48/2020 dated 29-03-2020 due to COVID-19 pandemic emergency and their pay will be activated from the date of taking over charge.
2. No TA/DA etc is allowed.
3. Charge reports should be submitted to all concerned in duplicate.
4. Appointment is purely on temporary & contract basis initially for one year from the date of taking over charge.
5. They should not be handed over charge if they exceed 35 years or below 18 years of age.
6. Relaxation in upper age limit to the extent of four months is hereby granted to S.No 5 as on 10-06-2019 i.e the last date of receipt of applications in the light of Govt of Khyber Pakhtunkhwa Establishment Administration Department (Estb; Wing) Notification No.SDE-III(E&AD) 2-1/2007 dated 01-03-2008 and of even No dated 25-10-2011.
7. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by this Office. Anyone found producing bogus Certificate/documents will be reported to the law enforcing agencies for further action.



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8. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one-month's pay & allowances shall be forfeited to the Government.
9. Pay will not be drawn until and unless the requisite letter regarding verification of their documents is issued by this office.
10. Health and Age Certificate should be produced from Medical Superintendent BBS Teaching Hospital Abbottabad concerned before taking over charge.
11. Before handing over charge, they will have to sign an agreement with the Department; otherwise this order will not stand valid.
12. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
13. Their services shall be terminated at any time, in case their performance is found unsatisfactory during contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
14. Their appointment is made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station till regularization.
15. Before handing over charge, once again their documents should be checked by the DDO concerned; if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.
16. In case of miscalculation of their marks affecting merit at any stage will be rectified accordingly which may affect the place of posting and appointment resultantly.
17. The appointees are required to undergo nine (09) months in service mandatory professional training at RITE/PITE as per Rules.
18. Copy of professional standards, core competencies and job description issued vide Govt: of Khyber Pakhtunkhwa E&SED Notification No. SO.(PE)4-3/PST/2014 dated 17-09-2014 is attached.

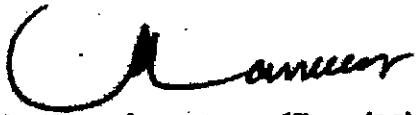
Muhammad Tanveer
District Education Officer (M)
Abbottabad

Dated 27-4-2020

Endst No 2520-28/EB-II/Apptt/AT

Copy forwarded for information and necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Comptroller of Accounts Abbottabad.
3. Principal/ Headmaster of Concerned Schools.
4. District Monitoring Officer IMU Abbottabad.
5. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
6. AP EMIS local office.
7. Budget & Accounts Officer Local Office.
8. Candidates Concerned.
9. Master File.


District Education Officer (M)
Abbottabad

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JSR

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

CORRIGENDUM

In pursuance to Director Elementary and Secondary Education Khyber Pakhtunkhwa Department Peshawar Memo No. 2825/A-54/Modification/Addition In Terms and Conditions dated 02-06-2020, the following three modifications/additions are hereby added in all the District Cadres' appointment orders issued vide Endst No. 2520-28/AT dated 27-04-2020, 2529-37/TT dated 27-04-2020, 2538-46/Qarl dated 27-04-2020, 2605-12/PET dated 30-04-2020 and 2776-84/DM dated 06-05-2020.

1. They should join their post within 15 days of the issuance of this Notification, in case of failure of join the post within 15 days, their appointment will expire automatically and no subsequent appeal shall be entertained.
2. District Account Officer (DAO) concerned should release their salaries on the production of duty certificate duly signed by the principals/Headmasters/DDO concerned and countersigned by the undersigned.
3. The appointment orders/notification may be issued/superseded (if any) with the word *immediate effect* instead of any other date.

sd/
District Education Officer (M)
Abbottabad

Endst: No 2969-79 /EB-Appointment

Date 10/6 /2020

Copy forwarded to:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Abbottabad.
3. District Comptroller of Accounts Abbottabad.
4. District Monitoring Officer-IMU Abbottabad.
5. PS to Secretary Govt. of Khyber Pakhtunkhwa E & SED Peshawar.
6. All the Principals/Headmasters of concerned schools.
7. Budget and Accounts Officer local office.
8. AP EMIS Local Office.
9. All the candidates concerned.
10. Master File

Uman
District Education Officer (M)

11

J. S.

OFFICE OF THE GOVERNMENT MIDDLE SCHOOL KANGAR MAIRA
ABBOTTABAD

CHARGE REPORT
To who it May Concern

It is certify that **Mr. Murad Gul S/O Gulzar** appointed as **Arabic Teacher (AT)**
vide order No / End No: **2520-28/EB-II/Apptt/AT** dated 27/04/2020 at **GMS Kangar**
Maira.

He has taken over charge on Arabic teacher (AT) post at GMS Kangar Maira
Abbottabad on dated 11-06-2020 Before Noon.

Charge report copies for information to

- i. D.E.O (Male) Abbottabad.
- ii. District Account Office Abbottabad
- iii. Concern Teacher

Khaw
Adnan

Headmaster
GMS Kangar Maira
Abbottabad

Murad Gul
Murad Gul
Arabic teacher (AT)

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Signature



PHONE & FAX: 0992-911102

EMAIL ADDRESS: EMISANNOTTABAD@YAHOO.COM

NOTIFICATION:

Under the provision of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Service) Act, 2022 (Khyber Pakhtunkhwa Act No. XLI of 2022) the service of the following Arabic Teachers (ATs) Male OPS-15 appointed on Adhoc/Contract basis w.e./from 02.03.2018 are hereby regularized in Teaching Cadre on the term and Conditions given below with effect from the date of their initial appointment till the commencement of the Act Ibid.

S. #	ROLL#	NAME	FATHER NAME	CNIC	DATE OF BIRTH	TOTAL MARKS	SCHOOL	ADVERTISEMENT NO & DATE	APPOINTMENT ORDER NO & DATE	EXTENSION ORDER NO & DATE
1.	112100 0447	IMRAN SHAH	MISKEEN SHAH	13101- 9790093-9	16-07- 1988	127.08	GMS HAZEENA	INFP 6711 27-11- 2017	Endst.No 673-80, Dated:16- 01-2019	933-40, 02-02- 2022
2.	192300 0232	MUHAMMAD ZEESHAN ABDULLAH	TAJ MUHAMMAD KHAN	13302- 8229267-3	10-10- 1989	119.62	GMS THATHI FAQIR SAHIB	INFP 6711 27-11- 2017	Endst.No 673-80, Dated:16- 01-2019	933-40, 02-02- 2022
3.	112100 0530	ABU BAKAR	MUHAMMAD ISHAQ	13101- 0771903-1	17-03- 1994	118.77	GMS NARA	INFP 6711 27-11- 2017	Endst.No. 673-80, Dated:16- 01-2019	933-40, 02-02- 2022
4.	112000 285	GHAFFAR KHAN	DILAWAR KHAN	13101- 5100864-7	28-08- 1991	118.27	GMS TAKIA HALL	INFP 6711 27-11- 2017	Endst.No. 673-80, Dated:16- 01-2019	933-40, 02-02- 2022
5.	112300 0504	MOHSIN ALI	RIAZ MUHAMMAD	13101- 7078499-7	17-07- 1990	118.02	GMS SERI KHAN KALA	INFP 6711 27-11- 2017	Endst.No. 673-80, Dated:16- 01-2019	933-40, 02-02- 2022
6.	112300 0440	MUHAMMAD ADEEL	MUHAMMAD AURANGZEB	13101- 6856645-7	25-05- 1994	124.29	GMS LONGAL	INFP 6711 27-11- 2017	Endst.No. 1427-29, Dated:01- 02-2019	918-24, 02-02- 2022
7.	111400 27	SYED NAQASH ALISHAH	SYED SABIR HUSSAIN SHAH	13101- 1175536-7	08-03- 1992	106.99	GMS BARQTA	INFP 6711 27-11- 2017	Endst.No. 11921-28, Dated:07- 11-2019	925-32, 02-02- 2022
8.	111100 257	MUSLIM AQEEL	MUHAMMAD MUSHTAQ	13101- 3207116-5	5-1- 1993	133.52	GHS PHALLA	INFP 2256-19 23-05- 2019	Endst.No. 2520-28, Dated:27- 04-2020	5188-95, 10-07- 2021
9.	111100 067	ZAHEER YOUNAS	MUHAMMAD YOUNAS	13101- 8716020-5	4-10- 1985	131.61	GMS DABBAN	INFP 2256-19 23-05- 2019	Endst.No. 2520-28, Dated:27- 04-2020	5188-95, 10-07- 2021
10.	111100 250	MURAD GUL	GULZAR	13101- 3399367-7	5-17- 1993	130-12	GHS KANGAR MAIRA	INFP 2256-19 23-05- 2019	Endst.No. 2520-28, Dated:27- 04-2020	5188-95, 10-07- 2021
11.	111100 064	FAKIR HUSSAIN	AURANGZEB KHAN	13101- 7169638-1	2-10- 1984	128.78	GHS NAMLI MAIRA	INFP 2256-19 23-05-19	Endst.No. 2520-28, Dated:27- 04-2020	5188-95, 10-07- 2021
12.	111100 199	MALIK KAMRAN ALI	MUHAMMAD ASHRAF MALIK KHAN	54400- 8261305-5	1-29- 1991	126.59	GMS KANGAR PAYEEN	INFP 2256-19 23-05- 2019	Endst.No. 2520-28, Dated:27- 04-2020	5188-95, 10-07- 2021

13

[Handwritten Signature]

TERMS AND CONDITIONS:-

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, The Khyber Pakhtunkhwa (Appointment Deputation Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity Act, 2022, and such rules and regulation as may be issued from time to time by Government.
2. Their services will be considered regular and they shall be eligible for pension/deduction of GP Fund in term of Khyber Pakhtunkhwa Civil Servant Act, 1973 as amended in 2013, however, the teachers appointed on or after 07-06-2022 shall be dealt with Section (2)(2) of the Khyber Pakhtunkhwa (Amendment) Act, 2022.
3. Their services are liable to termination on one-month notice from either side- In case of resignation without notice, their one month pay-allowances shall be forfeited to the Government.
4. They shall possess the same qualification and experience required for the subject post on regular basis as specified in Section (3)(a) of the Act.
5. Their regularization shall not affect the service promotion quota of all service cadres as specified in Section (3)(c) of the Act.
6. They shall be entitled for seniority and pay from the date of initial appointment on Adhoc-Contract basis as specified in Section (3)(d) of the Act.
7. They shall perform duty for at least three years from the date of taking over charge where they were appointed- posted initially.
8. The regularization shall not be in favor of those teachers who have not taken over charge, remained absent from duty and resigned from service.
9. The Teacher, regularized through this notification, shall be confirmed after successful completion of in-Service mandatory training as specified in their Service Rules notified vide Notification No-50(PE) 4-5-SSRC-Meeting-2012-Teaching Cadre-2017 dated 07-03-2018, within two consecutive attempts otherwise their appointment order shall be considered as withdrawn-cancelled from the date of declaration of result of the second attempt made in the induction program.
10. Principals-Headmasters are directed to check-verify the documents-Extension Orders etc of the regularized teachers once again with the criteria mentioned for regularization- If the teachers don't meet the criteria their services shall be considered as ceased.

MUHAMMAD TANVEER
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Dated 13/12/2022

Endst.No. 9308-13 EB-II/Regularization/AT

Copy forwarded to:-

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa Elementary and Secondary Education Department.
2. The Director Elementary and Secondary Edu: Khyber Pakhtunkhwa Peshawar.
3. The District Comptroller of Accounts Abbottabad.
4. Budget and Accounts Branch Local Office.
5. Assistant Programmer EMIS local office.
6. Official concerned.

[Handwritten Signature]
By: DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Annexure B

(14)

[Handwritten signature]



DEPARTMENT OF EDUCATION
GOVERNMENT OF KARNATAKA
BANGALORE

1. The Government of Karnataka has decided to...

2. The Government of Karnataka has decided to...

3. The Government of Karnataka has decided to...

4. The Government of Karnataka has decided to...

5. The Government of Karnataka has decided to...

Better Copy

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

14A

ORDER:

No. 2176-96/SNC-22/PTRC/NCC Dated: 21.04.2022:- 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 Provincial Textbooks Review Committee (PTRC) meeting for review of Model Textbooks based on SNC 2022 developed under NCC. The review will be conducted at National terms and conditions mentioned in KPTLM Policy 2017.

[Signature]

S#	Subject-Grade	Nominees of the Review Committee
1.	Islamiat Grade VI	Mateeullah, SST GHS No.4 Abbottabad Muhammad Abdullah, AT GMS Taror Abbottabad Mr. Sada Hussain Alvi, TT GMS Kasaki Abbottabad Ms. Shabana Shaheen, Desk Officer DCTE KP Abbottabad Mr. Sajid ur Rehman, Desk Officer KP TBB Peshawar
2.	Islamiat Grade VII	Qazi Muhammad Aamir Khan, Principal GHS No. 1 Havelian Atd Mr. Murad Gul, AT GHS, Kangar Maira, Abbottabad Mr. Rajab Ali, SST, GHS No. 2 Abbottabad Ms. Shabana Shaheen, Desk Officer DCTE KP Abbottabad Mr. Sajid ur Rehman, Desk Officer KP TBB Peshawar
3.	Islamiat Grade VIII	Dr. Muhammad Javed, Principal GHS, Kakool Abbottabad Muhammad Aamir, SST GHS Ghambeer Abbottabad Mr. Saeed Rehman, TT GHS Mohar Mansehra Ms. Shabana Shaheen, Desk Officer DCTE KP Abbottabad Mr. Sajid ur Rehman, Desk Officer KP TBB Peshawar

TORs:

The Review committee will ensure that in the manuscript:

- Compliance with Curriculum standards and SI, Os.
- All the visual elements are child-friendly and eye catching.
- A variety of relevant Assessment strategies are included at the end of each chapter.
- The content (text and illustrations) is inclusive and is free from religious, sectarian, ethnic, regional, cultural, sexual, occupational and socio-economic biases.
- Desk Officers of KP TBB and DCTE KP are requested to coordinate with Chairman of their Review Committees.
- The composers are requested to incorporate changes made by the committees on the spot and ensure complete incorporations by the end of PTRC.

NOTE: TA/DA will paid per policy/government rules.

You all are therefore, requested to attend the review proceeding as per schedule given above and in the light of E & SE.

Deptt. Letter No. SO (SM) E&SED/12-1/2019/Misc; Peshawar the, October 10, 2019

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

Copy forwarded for information to the;

15

2

[Handwritten signature]



**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 Ghambeer 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.

[Handwritten signature]
(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)

16

Annexure C



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

Phone # 0992-382634 Fax # 0992-381527 Email: director.dcte@kpcse.gov.pk

ORDER

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 Havelian 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

DIRECTOR

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

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

(17)

Annexure D



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No.SO (B/T) E&SED/TBB/11-13/SS-Islamiyat
Dated Peshawar the, 08.12.2022

To

Mr. Murad Gul,
Islamiyat Teacher (BS-15),
GHS Kangarh Mera, 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:

08/12/2022
SECTION OFFICER (B/T)

Endst: Even No. & Date:

Copy of the above is forwarded to the: -

1. Chairman, KP-Textbook Board, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director DCTE, Khyber Pakhtunkhwa Abbottabad.
4. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.
5. PS to Special Secretary E&SE Department.
6. PA to Addl: Secretary (Gen), E&SE Department.
7. PA to Deputy Secretary (Boards & Training), E&SE Dept

08/12/2022
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, Mr. Murad Gul, Islamiyat Teacher (BS-15), GHS Kangarh mera, 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 Islamiyat 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 Islamiyat 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 Islamiyat 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

b) _____

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

Mr. Murad Gul, Islamiyat Teacher (BS-15),
GHS Kangarh Mera, Abbottabad

Annexure E

19

To

The Secretary,
E & SE Khyber Pakhtunkhwa.

Subject: REPLY OF THE SHOW-CAUSE NOTICE

مراجعه

Respected sir,

I solemnly declare that I belong to a notable, religious family, having a firm belief in "خاتم النبیین". I am M. Phil Islamic Studies Scholar and also graduated in DARSE NIZAMI, that proves my efficiency/competency in the subject. Unfortunately, only recently (i.e.8/12/2022), I have been served a show-cause notice for review of model textbooks based on SNC 2022 developed under NCC (Annexure A), from your dignity and honour for my inefficiency and misconduct. Keeping in the view, the review was made on war footing basis.

With reference to your letter bearing No. SO(B/T)E&SED/TBB/11-13/SS-ISLAMIYAT dated 08-12-2022: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 Abu Bakar (r.a) second khalifa instead of 1st khalifa in the class 7 text book 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 text book of islamiyat for class 7th i.e. Revelation has been shown stopped after bestowing prophet- hood on Hazrat Muhammad (PBUH).

Reply of the aforesaid 2 charges:

The errors were not present in the manuscript reviewed by the provincial text book review committee (PTRC). The afore mentioned material was incorporated by the publisher on its own.(Annexure CI,CII)

Hence the undersigned should not be made 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 Hassan (ra).

Reply of the charge:

Not applicable as the charge is irrelevant (Annexure D)

Therefore the undersigned should not be held responsible for this error.

20



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:

Not applicable as the charge is irrelevant (Annexure E)

Therefore the undersigned should not be held responsible for this error.

4. **Charge at para v:**

You being reviewer did not observe that a lesson on Ghazi Aleem-ud-din was present in the text book 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:

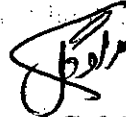
Not applicable as Ghazi Aleem-ud-din shaheed is not the part of the text book of islamiyat. (Annexure F)

Therefore the undersigned should not be held responsible for this error.

Moreover, the text book of Islamiyat grade 7th is **test edition**, which implies that this textbook have been printed for one year.

In the light of aforementioned evidence, it is obvious that neither, it was wilful act of violation nor negligence on the part of undersigned. it is therefore prayed that penalty not to be imposed upon the undersigned. With the desire to be here in person, if required please.

Yours Sincerely,



Murad Gul (AT)
GHS Kangar Maira
Abbottabad.

Annexure F

21

MOST IMMEDIATE



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

Block "A" Civil Secretariat Peshawar.

No.SO(B/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 7TH & 8TH 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. SOG(C&TD)1-5/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.

#	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. Rajab Ali,	SST GHS No.1 Abbottabad
4	Mst. 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)

Endst: 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.



Annexure 6

22



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the, 19th October, 2023.

NOTIFICATION.

No. SO(B&TE&SE/II-E&SE/II-IJSS Islamabad/III) /18

WHEREAS Mr. Murad Gul,

Islamiyat Teacher (BS-15), GHS Kangarh Mera, Abbottabad was proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for mistakes and errors in the Textbooks of Islamiyat for Classes 4th, 7th & 8th for the Academic Year, 2022-23.

2. AND WHEREAS Mr. Abdul Akram, (PMS BS-18), Addl. Secretary, E&SE Department and Dr. Hafiz Muhammad Ibrahim, Ex-Director, Directorate of E&SE conducted inquiry against the accused.

3. AND WHEREAS the inquiry committee after having examined the charges, evidence on record and explanation of the accused, submitted the report.

4. AND WHEREAS a show cause notice was served on him and major penalty of "Dismissal from Service" was tentatively imposed upon the accused by the Competent Authority (Chief Minister, Khyber Pakhtunkhwa). In response to the show cause notice, Mr. Tahir Orakzai, Secretary Tourism, was nominated to give an opportunity of personal hearing to the accused on his behalf.

5. AND WHEREAS Mr. Tahir Orakzai, Secretary Tourism afforded personal hearing to the accused on behalf of the Competent Authority on 09.02.2023 who recommended imposition of minor penalty instead of major penalty under Rules-4 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

6. NOW, THEREFORE, in exercise of the powers conferred upon him under Rule 4 (1) (a) (ii) of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after considering the findings and recommendations of the inquiry committee and hearing officer, is pleased to impose minor penalty of "Withholding Of Two Annual Increment For Two Years" upon Mr. Murad Gul, Islamiyat Teacher (BS-15), GHS Kangarh Mera, Abbottabad with immediate effect.

SECRETARY

Ends: of even No. & Date.

Copy is forwarded to:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Chairman, KP-Textbook Board, Peshawar.
4. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
5. District Education Officer (Male), Abbottabad.
6. Mr. Murad Gul, Islamiyat Teacher (BS-15), GHS Kangarh Mera, Abbottabad.
7. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
8. PS to Secretary E&SE Department, Peshawar.
9. Office order file.

SECTION OFFICER (BOARDS & TRG)

Annexure (A)

23

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

No: 336 / Misc. File.
Dated: 27/01/2024

To

Head Master
The Govt: Middle school
Galdhok Abbottabad.

Subject: **WITHHOLDING TWO ANNUAL INCREMENT OF TWO YEARS**

Memo: -

In compliance with the Director Elementary & Secondary Education KPK Peshawar vide notification No.SO (B &T) E 7SE/11-13/SS Islamiyat/TBB dated:19.10.2023, and this office Endst: No.10725/EB-I Dated:07.12.2023 regarding finding and recommendation of the inquiry committee and hearing officer, to impose minor penalty of **withholding two annual increment for two years.**

In this regard it is directed to you to submit the service book of Mr. **Murad Gul (TT) GMS Galdhok Abbottabad** in the office of the undersigned with in no time to proceed further in the matter and for onward submission to quarter concerned i.e. District Account Office Abbottabad.


District Education Officer

(Male) Abbottabad

Endst:No. _____ Dated: ____/01/2024

Copy to:-

1. Mr.Murad Gul (TT) GMS Galdhok Abbottabad.


District Education Officer
(Male) Abbottabad

Annexure I

24

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

[Handwritten Signature]

SUBJECT: PLEA FOR REVIEW /RECONSIDERATION OF THE PENALTY AS ENFORCED VIDE NOTIFICATION NO. SO(B&T)E&SE/11-13/SS ISLAMIYAT/TBB/18. 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(*Letter*) on the following charges()::

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 and 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.

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

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[Handwritten signature]

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 escape goat for the trespass of the publisher.(original i.e reviewed manuscript is Annexure-) 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), which clearly outlines the scope of the reviewer's role.
- 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,

[Handwritten signature]

MURAD GUL
GHS Kangar Maira
Abbottabad

26

Annexure J

[Handwritten signature]

MURAD GUL
GMS
ABBOTTABAD
03125770943

Date	Time	Location	Ums	Value
20/11/2023	12:00	Abbottabad GPO	UMS33649934	150 0
		CHIEF MINISTER CM HOUSE Peshawar 0000000000000000		130.43 0 0 0
				19.57
				150
			WAQAR_ABTGPO FTN: 9010405	

S.No. 217407 Mob: _____

Name of Advocate Shazad ShaKoor

DBA NO. 784 TBA NO. _____

BC No. 17-7860



R.s.200/=

وکالت نامہ 27

Sh Muhammad Naseem
Finance Secretary
District Bar Association
Abbotabad

جناب جسٹس سید منیر ہاشمی کپک اپیل

بعدالت

عنوان: مُراد حل نام حکومت

مخائب: Appellant نوعیت مقدمہ Service Tribunal

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی و جو کہ بی بی برائے پیشی یا تصفیہ مقدمہ بمقام اپیل کے لیے

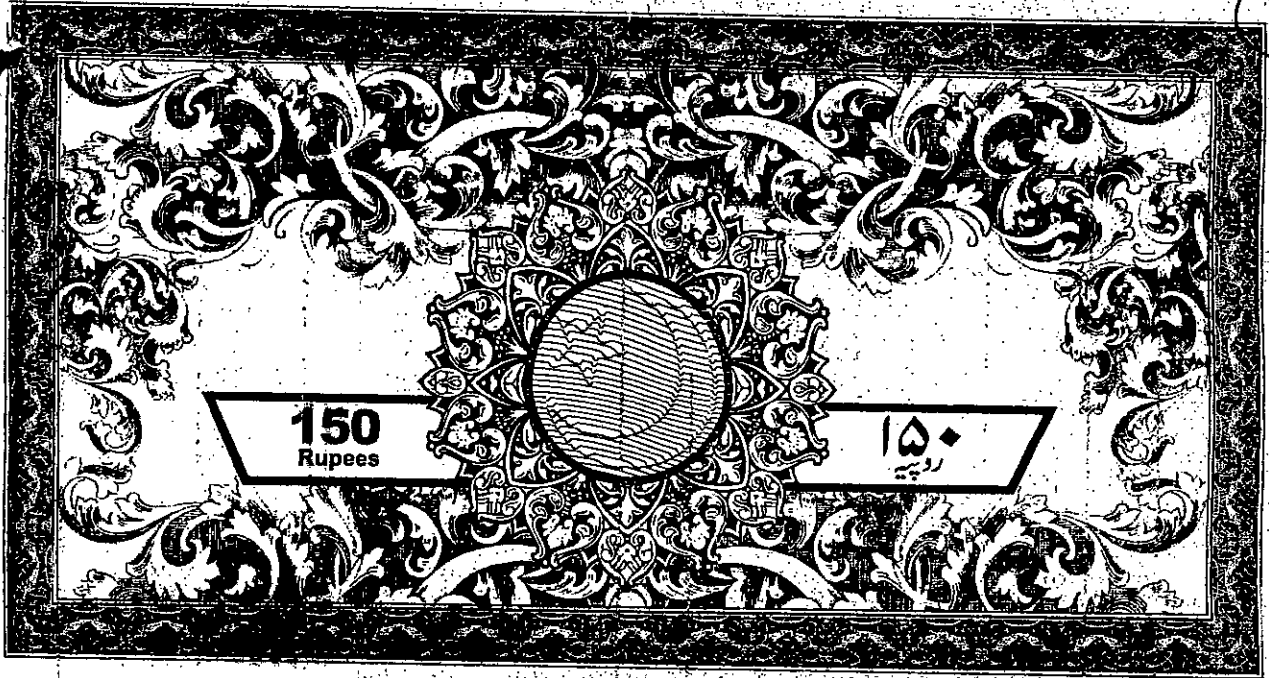
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہونا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر مدد ادا نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا بیچے یا بروڑ تھیل بیروی کرنے سے ڈنڈہ ڈار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروڑ تھیل یا کچہری کے اوقات سے پہلے یا بیچے یا بروڑ تھیل کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار کے وکیل کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مختار کی سزا سزا پر وادخت صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعوی یا جواب دعوی اور درخواست اجراء کے ذکر کی و نظر ثانی اپیل گرائی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر تاشی و توثیق کا بھی اختیار ہوگا۔ اگر کسی کو کوئی دعوئی دے گا یا کسی کو اختیار ہوگا اور بصورت جانے بیرونجات از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفر درخواست حکم یا منسوخی یا ترقی یا اگر قاری قبل از قاری واجرائے ڈگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ مختار بیروی 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 دعوئی کو اپنے یا اپنے ہر امور میں واپس اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف 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 بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

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

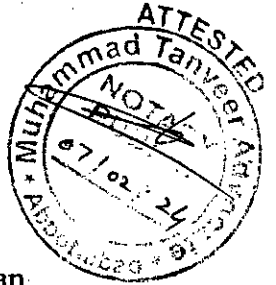
نوٹ: وکالت نامہ کی فونو کاپی قابل قبول نہ ہوگی

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**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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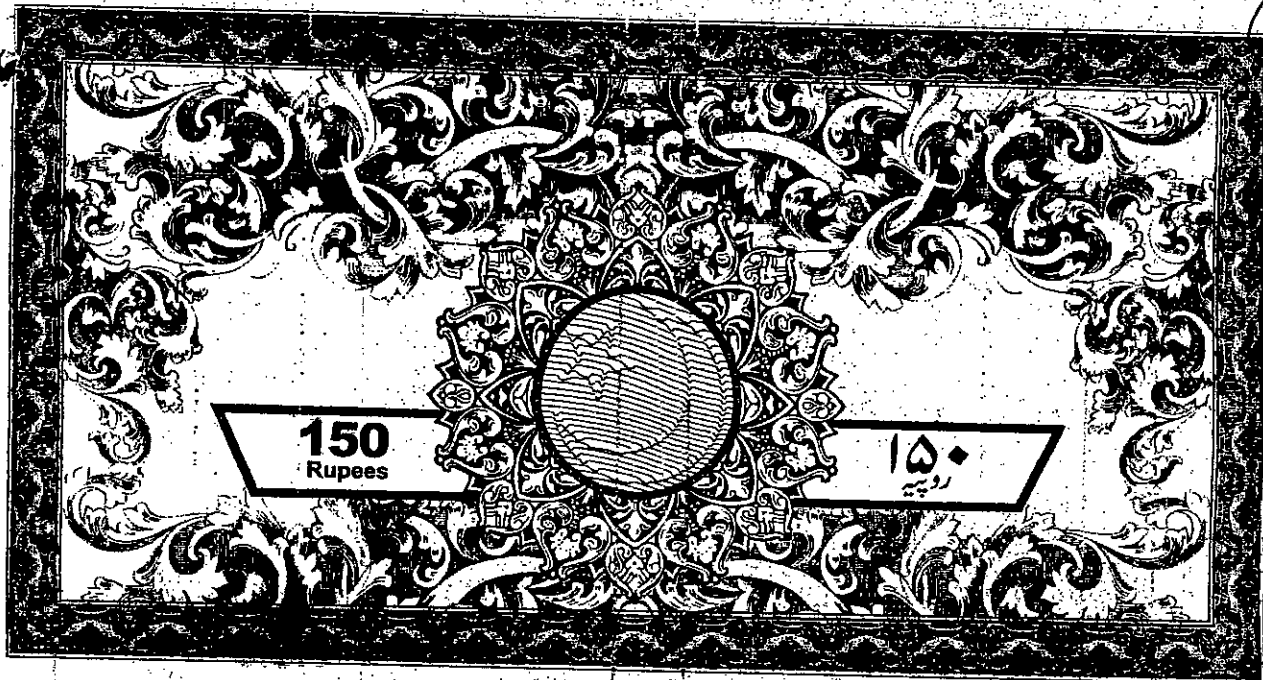
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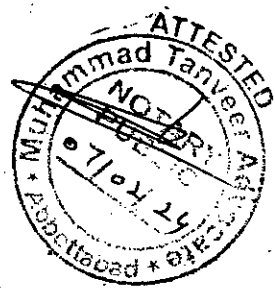
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We, Qazi Muhammad Aamir Khan S/O Qazi Muhammad Nawaz Khan, Principal, GHS No 1 Havelain, Abbottabad, Murad Gul S/O Gizar, Arabic Teacher, GMS Galdhok (Boys), Abbottabad, deponent, do hereby solemnly affirm and declare on oath that we appoint above 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 Gizar)
 Appellant

CNIC No 13101-3399367-7

DEPONENT