


FORM OF ORDER SHEET

Court of _____

Appeal No. 1478/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/09/2024	<p>The appeal of Mr. Muhammad Fayaz re-submitted today by Mr. Nasir Mahmood Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Fayaz received today i.e on 12.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appellate authority has not been arrayed/made a party.
- 2- Annexures of the appeal are unattested.

No. 789 /Inst./2024/KPST,

Dt. 13/9 /2024.

Amate Ullah
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Nasir Mahmood Adv.
High Court at Peshawar.

*Resubmitted After doing
the need full.*
RL

**BEFORE THE HON'BLE KHYBER PAKHUNKHWA,
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 1478 /2024

Muhammad Fayaz **Appellant**

Versus

Director, Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar, & Another..... **Respondents**

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of Parties		7
4.	Copy of the Appointment order dated:28.04.2017	A	8-9
5.	Copy of the application along with admission notice	B	10-12
6.	Copy of the Salary Slips, Show Cause Notice and order dated:14.03.2024	C	13-14
7.	Copy of the Departmental Appeal, report dated:09.05.2024 and letter dated dated:30.07.2024	D	20-22
8.	Copy of the Passport and application	E	23-26
9.	Copy of the letter dated:05.09.2024	F	27
10.	Wakalatnama		28


Appellant

Through


Nasir Mehmood
Advocate Supreme Court
Cell#0333-9176275

Dated 11.09.2024

1

**BEFORE THE HON'BLE KHYBER PAKHUNKHWA,
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 1478 /2024

Muhammad Fayaz S/O Taj Muhammad R/O Mohalla Rehmat
Khel, Rehmat Abad, Tehsil and District Karak

.....Appellant

Versus

1. Director, Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar.
2. District Education Officer (M) Karak.

.....Respondents

**SERVICE APPEAL U/S 4 OF THE
SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED ORDER
DATED:14.03.2024 WHEREBY MAJOR
PENALTY OF REMOVAL FROM SERVICE
WAS IMPOSED UPON THE APPELLANT
AND HIS DEPARTMENTAL APPEAL FOR
RE-INSTATEMENT IN SERVICE WAS
FILED AND WAS NOT COMMUNICATED
TO THE APPELLANT.**

Prayer

**By accepting this Appeal, the
impugned orders dated 14.03.2024 &
order on Departmental Appeal may
please be set aside and the appellant
may be reinstated in his service with
all back benefits.**

Respectfully Sheweth:-

1. That the appellant consequent upon the recommendations of Departmental Selection Committee was appointed through order dated:28.04.2017 against the post of CT in Government Middle School Warga Banda District Karak. **(Copy of the Appointment order dated:28.04.2017 is annexed as Annexure "A")**.
2. That appellant performed his duties to the entire satisfaction of his Superiors and there was no complaint against the appellant from any quarter. The appellant performed his duties with devotion and dedication to his work.
3. That the appellant was awarded Presidential Scholarship in the subject of Chemistry under the Chinese Presidential Scholarship Program for admission in Material Sciences, Qingdao University, Qingdao China.
4. That the appellant for securing higher studies applied to the District Education Officer through proper channel for grant of NOC and for four years study leave for Ph.D Program in the subject of Chemistry w.e.f 01.10.2023 to 30.09.2027. The application of the appellant was forwarded to the District Education Officer, Karak. **(Copy of the application along with admission notice are annexed as Annexure "B")**.
5. That the appellant was told by the District Education Officer that since process of accepting application of the appellant for leave will take sufficient time therefore, he should leave for China to join his studies. The appellant as per advice of the District Education Officer proceeded to China and joined his studies.
6. That the appellant was receiving his monthly salary upto March, 2024 whereafter it was discontinued and as the appellant was in China therefore, he through relative got information from the Education Office District Karak,

that he has been removed from service without following codal formalities vide order dated:14.03.2024. **(Copy of the Salary Slips, Show Cause Notice and order dated:14.03.2024 are attached as Annexure "C").**

7. That the appellant preferred a Departmental Appeal to the respondent No.01, to which report is submitted by DEO Karak. The appellant was called for personal hearing through letter dated:30.07.2024 but as the appellant was in China therefore, he was unable to have received or got information of the letter dated:30.07.2024. **(Copy of the Departmental Appeal, report dated:09.05.2024 and letter dated dated:30.07.2024 is annexed as Annexure "D").**
8. That when the appellant landed in Pakistan on 21.07.2024 therefore, he on 24.07.2024 submitted application for personal hearing. **(Copy of the Passport and application are attached as Annexure "E").**
9. That the respondents were not giving reply to the appellant therefore, he approached RTI Commission for doing the needful who through letter dated:05.09.2024 informed that his appeal has been seen and filed. **(Copy of the letter dated:05.09.2024 is annexed as annexure "F").**
10. That appellant being aggrieved wherefrom is filing the instant appeal on the following amongst other grounds:

GROUND S:

- A. That the appellant has treated un-equally, against the law and thus is deprived of equal protection before the law.
- B. That the impugned order passed by the department/respondents are illegal, against the facts

and valuable rights of the appellant hence not maintainable and is liable to be set aside.

- C. That the appellant was removed from service through the impugned order dated 14.03.2024 on the ground of willful absence of duty but the respondents has not proceeded against the appellant in accordance with law and flagrantly violated Rule-09 of the Government Service (Efficiency and Disciplinary Rules, 2011).
- D. That the appellant has moved application for leave through proper channel and impression was given to the appellant that his leave application will be approved in due course of time therefore, he should leave for China for joining his studies although under the leave rules the appellant was entitled for study leave which was illegally declined to the appellant.
- E. That appellant is a poor person and the only earning hand of the family therefore he is also entitled to reinstatement.
- F. That as per judgment of the Superior Courts of the country the punished imposed should commensurate with the gravity offence but in the case of appellant such principles has been violated by the respondents.
- G. That Respondents have awarded maximum punishment to the appellant and thus have cause serious miscarriage of justice

- H. That any other ground will be raise at the time of arguments with the prior permission of this Honourable Tribunal.

It is, therefore most humbly prayed that **accepting this Appeal, the impugned orders dated 14.03.2024 & order on Departmental Appeal may please be set aside and the appellant may be reinstated in his service with all back benefits**

Nasir
Appellant

Through


Nasir Mehmood
Advocate Supreme Court
Cell#0333-9176275

Dated 11.09.2024

**BEFORE THE HON'BLE KHYBER PAKHUNKHWA,
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2024

Muhammad Fayaz **Appellant**

Versus

Director, Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar, & Another

..... **Respondents**

AFFIDAVIT

I, Muhammad Fayaz S/O Taj Muhammad R/O Mohalla
Rehmat Khel, Rehmat Abad, Tehsil and District Karak, do
hereby solemnly affirm and declare on oath that the contents
of the accompanying **Service Appeal** are true and correct to
the best of my knowledge and belief and nothing has been
concealed from this Hon'ble Court.

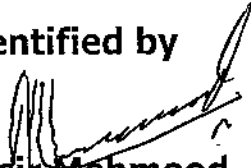
M Fayaz

DEPONENT

CNIC#14202-9189519-5

Cell#0331-9807944

Identified by



Nasir Mehmood

Advocate, Supreme Court

**BEFORE THE HON'BLE KHYBER PAKHUNKHWA,
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2024

Muhammad Fayaz **Appellant**

Versus

Director, Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar, & Another

..... **Respondents**

ADDRESSES OF PARTIES

APPELLANT:

Muhammad Fayaz S/O Taj Muhammad R/O Mohalla Rehmat
Khel, Rehmat Abad, Tehsil and District Karak

RESPONDENTS:

1. Director, Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar.
2. District Education Officer (M) Karak

Muhammad Fayaz
Appellant

Through

Nasir Mehmood
Nasir Mehmood
Advocate Supreme Court
Cell#0333-9176275

Dated 11.09.2024

Annex A

⑧



**DISTRICT EDUCATION OFFICER
(MALE) KARAK.**

APPOINTMENT ORDER

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Cf. School based in BPS-15 (13510-1120-47110) 13510/-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 :-

Sr	Name	Father Name	Date of Birth	(Academic Score)	NTS Marks	Total Marks (Out of 200) J=H+I	School where appointed
1	SHAKIR ULLAH SHAKIR	GUL RAHIM KHAN	1931-9-9	56.496	75.0	141.496	GHSS Kando Khel
2	ZAFAR IQBAL	AQLEEM KHAN	1939-4-30	65.89	68.0	133.89	GHSS Nari Panos
3	ALEEM ULLAH	IHSAN ULLAH	1994-4-30	66.51	67.0	133.51	GHS Jatta Ismail Khel
4	TANZEER AITIZAZ	ABID NAWAZ	1987-12-15	60.25	71.0	131.25	GHSS Nari Panoos
5	BARKAT ULIAH	HAZRAT BILAL	1987-3-2	62.87	68.0	130.87	GHS Mandawa
6	KALIM ULLAH KHAN	WAZIR MUHAMMAD	1990-3-30	65.52	65.0	130.52	GHSS Nari Panoos
7	IHSAN ULLAH	ABDUL SALAM	1991-3-3	58.55	60.0	127.55	GHSS Chanda Khurram
8	AIZAZ SHAH	AMJAD HUSSAIN SHAH	1993-4-10	59.39	58.0	127.39	GHS Teri
9	MUHAMMAD FAYAZ	TAJ MUHAMMAD	1989-3-15	63.79	63.0	126.79	GMS Wargha Banda
10	NAVEED IQBAL	ZER MUHAMMAD	1992-9-12	66.14	60.0	126.14	GMS Anar Banda
11	WASIM ULLAH	BAKHT AMIN	1987-4-13	57.06	69.0	126.06	GMS Mahmood Khel
12	AAZAZ AHMED	MIR SHAH JEHAN	1993-3-25	66.05	60.0	125.77	GHS Latamber
13	INAYAT ULLAH	ZER NAWAZ KHAN	1993-4-4	65.73	60.0	125.73	GMS Kurd Sharif
14	MEHTAB AHMED	AWAL SARDAR	1989-4-11	58.67	72	125.67	GHS Hayat Abad
15	ATTA UR REHMAN	GUL RAHIM	1985-3-25	58.50	67.0	125.50	GHS Esak Khumari
16	ZAIN UL ABIDEEN	SHAUKAT ALI	1987-5-20	63.21	62.0	125.21	GHS Chanda Khurram
17	SHUIAH UR REHMAN	YAR GUL KHAN	1986-4-15	58.06	67.0	125.06	GMS Inzer Payan
18	MUHAMMAD NASIR IQBAL	GUL SAID ALI	1989-6-1	62.06	63.0	125.06	GHS Mami Khel
19	ANEES UR RAHMAN	KHAIR ULLAH KHAN	1993-5-1	65.72	59.0	124.72	GMS Kurd Sharif

20	MUHAMMAD YOUNAS	PIR NAWAZ	1985-3-5	64.45	60.0	124.46	GMS Aral Adam Banda
21	IMRAN ULLAH	BASIR GUL	1982-3-25	56.44	68.0	124.44	GHS Hayat Abad
22	SAEED UR RAHMAN	NIJAZ MUHAMMAD KHAN	1982-4-13	69.33	55.0	124.33	GMS Inzer Payan
23	SHAHID ULLAH	NOOR UD DIN	1985-4-3	59.11	65.0	124.12	GHSS Kanda Khel
24	RAFIQ ULLAH	MIR DAD KHAN	1983-9-1	59.69	64.0	123.69	GMS Cahrpara
25	KEFAYAT ULLAH	JALAL SHAH	1991-4-3	63.68	50.0	123.68	GHSS Chanda Khurram
26	ATTIQ UR REHMAN	UMER FAROOQ	1989-1-31	63.95	59.0	122.95	GMS Urbashi
27	INAM ULLAH	RAFIQ ULLAH	1985-4-10	61.07	61.0	122.07	GMS Aman Kot

TERMS & CONDITION

- No TA/DA etc is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year with effect from 24.04.2017 to 23.4.2018.
- They should not be handed over charge if they exceed 35 years or below 18 years of age.
- Appointment is subject to the condition that their documents must be verified from the concerned Boards/Universities by the DDEO. Any one found producing bogus Certificate/Degree will be reported to the law enforcing agencies for further action and his appointment will stand withdrawn.
- Their services are liable to termination on one month prior notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
- Their Pay will not be drawn until and unless their certificates/Degrees are verified from the Concerned Boards/Universities.
- They should join their posts within 10 days of the issuance of this notification. In case of failure to join his post within 10 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- Their appointments are made on School based. They will have to serve at the place of posting, and their services are not transferable to any other station.
- Their Pay will be released by the signature of the undersigned (DEO) after verification of their documents. No one allowed to release their pay without verification.
- In case of Government Servant, he will resign before handing/taking over charge in the new assigned post.

DISTRICT EDUCATION OFFICER
(MALE) KARAK

Endst: No 2493-26 / Apptt: Ct/Estb:Secy: Dated Karak the 28 / 04/2017.

Copy forwarded for information and necessary action to the:-

1. PA to the Director (L&S) Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer Karak.
3. All the Principals/IM GHSS, GHS, GMS Concerned for n/action.
4. Candidate Concerned.

TA
DISTRICT EDUCATION OFFICER
(MALE) KARAK

28/04/17

Annex B

(10)

To

DISTRICT EDUCATION OFFICER
(Male) KARAK

Through Proper Channel

Subject: Granting of NOC and 4 Year Study Leave for PhD Program
w.e.f 01-10-2023 to 30-09-2027

Respected Sir,

It is stated with due respect that I, Mr. Muhammad Fayaz M.Phil Chemistry, a permanent employee of E&SED, serving as CT (BPS-15) at GHSS Karak since 21.01.2019 till date. I was appointed on 29.04.2017 at GMS Wargha Banda Karak and my total services 06 years and 06 months in this Education Department.

I have secured PhD-Chemistry admission in the *college of Material Sciences, Qingdao University, Qingdao, China* under Chinese Presidential scholarship. (Admission offer letter copy attached herewith)

Sir, as your good self-know that PhD is a full time study program and need regular attendance in classes and Laboratory. In this respect, I kindly request to grant me NOC and 4 years study leave w.e.f. 01/10/2023 to 30/09/2027 for the said program. I believe that this opportunity will not only contribute to my professional development but also provide benefit to our organization.

Thanks for your time and consideration..

Muhammad

Date: *12/10/2023*
No: 569
Forwarded to DBO (M) Karak

Muhammad Fayaz
P.No: 00852641
CT (BPS-15)
GHSS Karak

[Signature]
PRINCIPAL
GHSS KARAK



青岛大学

QINGDAO UNIVERSITY

College Of International Education
Qingdao University
Qingdao 266071
P. R. China

(11)

Admission Notice

录取通知书

Dear Ms/Mr. MUHAMMAD FAYAZ

No. 23-QD-PSD0060

Having examined your application materials, we are pleased to inform you that you have been admitted as a Doctor's Degree Student to study at the College of Material Science and Engineering of Qingdao University from Sep. 7, 2023 to Jul. 15, 2027.

Please note that you must register, with this material, at Qingdao University between Sep. 4 and Sep. 6, 2023.

If you fail to register within the time limit without the permission of our university, you will be regarded as giving up this offer of admission.

- You are granted the Presidential Scholarship. The Scholarship provides tuition fee, accommodation fee, living allowance, and comprehensive medical insurance expenses.

我们高兴的通知您，经审核您的申请材料，我校已决定录取您为 博士研究生，材料科学与工程学院 学习。学习期限为 2023 年 9 月 7 日至 2027 年 7 月 15 日。

请您持本通知书，于 2023 年 9 月 4 日至 2023 年 9 月 6 日到青岛大学报到。

如因故不能按时到校报到，必须事先征得学校同意，否则将作为自动放弃入学资格处理。

- 您获得校长奖学金在青岛大学学习。奖学金资助内容为：学费、校内基本住宿、月生活费 and 综合医疗保险。

Handwritten signature

Subject Specialist
GHSS Karak

Signed by:
学生本人签字

Handwritten signature

Date:
日期: 31-08-2023

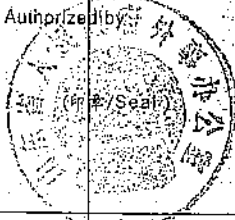



外国留学人员来华签证申请表
 Visa Application for Study in China

12 02

中华人民共和国教育部印制/Printed by the Ministry of Education(MOE) of PRC

JW202

No.22087861		接受院校/Host Institution: 青岛大学	
由 接 受 留 学 人 员 院 校 填 写	姓名: Name:	姓/Family Name Fayaz	名/Given Name Muhammad
	国籍/Nationality: 巴基斯坦	护照号码/Passport No.: BD8116192	性别/Gender: 男 婚否/Marital Status: 已婚
	出生日期 Date of Birth:	年 月 日 y1989 m, 03 d, 15	出生地点/Place of Birth: Karak, KPK, Pakistan Rohmat Abad, Tehsil and District: Karak/KPK
	家庭地址和电话/Home Add.&Tel.:	+92-3319807944	
	最后学历 Highest Academic Degree Obtained:	Master	职业/Occupation: Student
	工作或学习单位/Employer or Institution Affiliated:	Kohat University of Science and Technology	
	来华学习专业/Field of Study in China: 材料科学与工程	学习期限: 自 年 月 日至 年 月 日 Duration: from y. m. to y. m.	2023 09 07
	学生类别/Student Status: 博士研究生	注册截止日期/Deadline for Registration: 年/月/日 y./m./d.	2023 09 06
	推荐单位电话/Reference & Tel.:	于冰: +86-532-85853995	
	在华事务担保人电话/Guarantor in China & Tel.:	青岛大学国际教育学院: +86-532-85953863	
经费来源/Source of Funding: 奖学金/Scholarship <input checked="" type="checkbox"/> 自费/Self-supporting <input type="checkbox"/> 其他/Other <input type="checkbox"/> 经济担保人/机构/Financial support will be provided by:	Tanveer Akhter: +923129128280		
审批机关盖章	Authorized by: 	申请人签字: Signature of Applicant: 	2023 09 02 年 月 日 y. m. d.
备注	1. 此表仅限于非政府渠道接受的外国留学人员使用。 2. 请持本表前往中国使(领)馆申请来华学习签证。 3. 请持本表到校注册。 Notes: 1. This form is for private and inter-institutional students. 2. Please present this form to apply for student entry visa at the Chinese Embassy or Consulate. 3. Please present this form to register at the host institution.		

第一联: 寄外国来华留学人员

扫描全能王 创建

Dist. Govt. KP-Provincial
District Accounts Office Karak
Monthly Salary Statement (November-2023)

Annex C

13



Personal Information of Mr MUHAMMAD FAYAZ d/w/s of TAJ MUHAMMAD

Personnel Number: 00852641

CNIC: 1420291895195

NTN:

Date of Birth: 15/03/1989

Entry into Govt. Service: 29.04.2017

Length of Service: 06 Years 07 Months 003 Days

Employment Category: Active Temporary

Designation: CERTIFICATED TEACHER

80002678-DISTRICT GOVERNMENT KHYBE

DDO Code: KK016-District Officer Schools & Literacy (Middle Male) KARAK

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

GPF Interest applied

GPF Balance:

187,233.00 (provisional)

Vendor Number:

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 6

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	35,800.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1644	Ph.d/M Phil Allowance	2,500.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Rd All 15% 2022KP	3,416.00	2347	Adhoc Rel AI 15% 22(PS17)	3,416.00
2378	Adhoc Relief All 2023 35%	12,530.00			0.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-352.00
3990	Emp. Edu. Fund KPK	-135.00	6075	Adj GPF	-5,600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	130,000.00	-5,000.00	90,000.00

Deductions - Income Tax

Payable: 3,629.78 Recovered till NOV-2023: 1,760.00 Exempted: 1407.25 Recoverable: 2,463.53

Gross Pay (Rs.): 68,766.00 Deductions: (Rs.): -17,177.00 Net Pay: (Rs.): 51,589.00

Payee Name: MUHAMMAD FAYAZ

Account Number: 14357900771003

Bank Details: HABIB BANK LIMITED, 221435 KARAK KARAK, KARAK

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: karak

Temp. Address:

City:

Domicile: -

Email: fayaz.kust@gmail.com

Housing Status: No Official

System generated document in accordance with APPM 4.6.12.9(30398429/24.11.2023/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/11.12.2023/23.07:55)

Dist. Govt. KP-Provincial
District Accounts Office Karrak
Monthly Salary Statement (December-2023)



14

Personal Information of Mr MUHAMMAD FAYAZ d/w/s of TAJ MUHAMMAD
 Personnel Number: 00852641 CNIC: 1420291895195 NTN:
 Date of Birth: 15/03/1989 Entry into Govt. Service: 29.04.2017 Length of Service: 06 Years 08 Months 004 Days

Employment Category: Active Temporary
 Designation: CERTIFICATED TEACHER 80002678-DISTRICT GOVERNMENT KHYBE
 DDO Code: KK/016-District Officer Schools & Literacy (Middle Male) KARAK
 Payroll Section: 01 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance: 196,523.00 (provisional)**
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 7

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	37,780.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1644	Ph.d / M. Phil Allowance	2,500.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Rel All 15% 2022KP	3,416.00	2347	Adhoc Rel AI 15% 22(PS17)	3,416.00
2378	Adhoc Relief All 2023 35%	12,530.00			0.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-389.00
3990	Emp. Edu. Fund KPK	-135.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	130,000.00	-5,000.00	85,000.00

Deductions - Income Tax

Payable: 5,976.28 Recovered till DEC-2023: 2,149.00 Exempted: 1493.94 Recoverable: 2,333.34

Gross Pay (Rs.): 70,746.00 Deductions: (Rs.): -11,614.00 Net Pay: (Rs.): 59,132.00

Payee Name: MUHAMMAD FAYAZ
 Account Number: 14357900771003
 Bank Details: HABIB BANK LIMITED, 221435 KARAK KARAK, KARAK

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: Karak Domicile: - Housing Status: No Official
 Temp. Address: City: Email: fayaz.kust@gmail.com

System generated document in accordance with APPM 4.6.12.9(50398429/26.12.2023/v3.0)
 * All amounts are in Pak Rupees
 * Errors & omissions excepted (SERVICES 31.12.2023/21:11:53)

Dist. Govt. KP-Provincial
District Accounts Office Karrak
Monthly Salary Statement (January-2024)

15



Personal Information of Mr MUHAMMAD FAYAZ d/w/s of TAJ MUHAMMAD
 Personnel Number: 00852641 CNIC: 1420291895195 NTN:
 Date of Birth: 15/03/1989 Entry into Govt. Service: 29.04.2017 Length of Service: 06 Years 09 Months 004 Days

Employment Category: Active Temporary
 Designation: CERTIFICATED TEACHER 80002678-DISTRICT GOVERNMENT KHYBE
 DDO Code: KK/016-District Officer Schools & Literacy (Middle Male) KARAK
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance: 285,813.00 (provisional)**
 Vendor Number: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 7
Pay and Allowances:

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	37,780.00	1001	House Rent Allowance 45%	3,524.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1644	Ph.d/M. Phil Allowance	2,500.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2022KP	3,416.00	2347	Adhoc Rel Al 15% 22(PS17)	3,416.00
3378	Adhoc Relief All 2023 35%	12,530.00			0.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-389.00
3990	Emp. Edu. Fund KPK	-135.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	130,000.00	-5,000.00	80,000.00

Deductions - Income Tax
 Payable: 976.28 Recovered till JAN-2024: 2,538.00 Exempted: 1493.93 Recoverable: 1,944.35

Gross Pay (Rs.): 70,746.00 Deductions: (Rs.): -11,614.00 Net Pay: (Rs.): 59,132.00

Payee Name: MUHAMMAD FAYAZ
 Account Number: 14357900771003
 Bank Details: (ABIB BANK LIMITED), 221435 KARAK KARAK, KARAK

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: karak Domicile: - Housing Status: No Official
 Temp. Address: City: Email: fayaz.kust@gmail.com

System generated document in accordance with APPAI 4.6.12.9(50398429/26.01.2024/v3.0)
 * All amounts are in Pak Rupees
 * Errors & omissions excepted (SERVICES 02.02.2024/23:13:48)

Personal Information of Mr MUHAMMAD FAYAZ d/w/s of TAJ MUHAMMAD

Personnel Number: 00852641 CNIC: 1420291895195 NTN: 16
 Date of Birth: 13.03.1989 Entry into Govt. Service: 29.04.2017 Length of Service: 06 Years 10 Months 002 Days

Employment Category: Active Temporary

Designation: CERTIFICATED TEACHER 80002678-DISTRICT GOVERNMENT KHYBE
 DDO Code: KK5016-District Officer Schools & Literacy (Middle Male) KARAK
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied GPF Balance: 215,103.00 (provisional)
 Vendor Number:
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 15 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	37,780.00	1001	House Rent Allowance 45%	3,524.00
1210	Conveyance Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1644	Ph.d/M.Phil Allowance	2,500.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Rel All 15% 2022KP	3,416.00	2347	Adhoc Rel At 15% 22(PS17)	3,416.00
2378	Adhoc Relief All 2023 35%	12,530.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-389.00
3990	Emp. Edu. Fund KPK	-135.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	130,000.00	-5,000.00	75,000.00

Deductions - Income Tax

Payable: 1,976.28 Recovered till FEB-2024: 2,927.00 Exempted: 1493.88 Recoverable: 1,555.40

Gross Pay (Rs.): 70,746.00 Deductions: (Rs.): -11,614.00 Net Pay: (Rs.): 59,132.00

Payee Name: MUHAMMAD FAYAZ
 Account Number: 14357900771003
 Bank Details: HABIB BANK LIMITED, 221435 KARAK KARAK, KARAK

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: City: Karak Domicile: - Housing Status: No Official
 Temp. Address: City: Email: fayaz.kustr@gmail.com

System generated document in accordance with APPM 4.6.12.9(50398429/23.02.2024/v3.0)
 * All amounts are in Pak Rupees
 * Errors & omissions excepted (SERVICES: 27.07.2024/07-09:28)

Dist. Govt. KP-Provincial
District Accounts Office Karak
Monthly Salary Statement (March-2024)



17

Personal Information of Mr MUHAMMAD FAYAZ d/w/s of TAJ MUHAMMAD
Personnel Number: 00852641 CNIC: 1420291895195 NTN:
Date of Birth: 15.03.1989 Entry into Govt. Service: 29.04.2017 Length of Service: 06 Years 11 Months 004 Days

Employment Category: Active Temporary
Designation: CERTIFICATED TEACHER 80002678-DISTRICT GOVERNMENT KHYBE
DDO Code: K6016-District Officer Schools & Literacy (Middle Male) KARAK
Payroll Section: 001 GPF Section: 001 Cash Center:
GPF A/C No: GPF Interest applied GPF Balance: 224,393.00 (provisional)
Vendor Number:
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: -15 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	37,780.00	1001	House Rent Allowance 45%	3,524.00
1210	Convoy Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1644	Ph.d / M.Phil Allowance	2,500.00	2316	Teaching Allowance 2021	3,224.00
2341	Dispr. Red All 15% 2023KP	3,416.00	2347	Adhoc Ret Al 15% 22(PS17)	3,416.00
2378	Adhoc Relief All 2023 35%	12,530.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-4,290.00	3501	Benevolent Fund	-1,200.00
3534	R. Ben & Death Comp Fresh	-600.00	3609	Income Tax	-389.00
3990	Emp. Ed. Fund KPK	-135.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	130,000.00	-5,000.00	70,000.00

Deductions - Income Tax

Payable: 5,076.28 Recovered till MAR-2024: 3,316.00 Exempted: 1493.85 Recoverable: 1,166.43

Gross Pay (Rs.): 70,746.00 Deductions: (Rs.): -11,614.00 Net Pay: (Rs.): 59,132.00

Payee Name: MUHAMMAD FAYAZ
Account Number: 14357900771003
Bank Details: HABIB BANK LIMITED, 221435 KARAK KARAK, KARAK

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: karak

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: fayaz.kust@gmail.com

12

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK
SHOW CAUSE NOTICE

I, Mr. Zuhoor Khan DEO Male Karak as competent Authority, under the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011, do hereby serve upon you (Mr. Muhammad Fayaz CT BPS-15) this Show cause as follows:

1. WHEREAS, you have been appointed vide good office No.2423-26 on 28-04-2017 against the post of CT and was working on regular basis at GHSS Karak.
2. WHEREAS, you applied for Study leave for the period of Four (4) years (w.e.f 01/10/2023 to 30/09/2027) which was regretted by the office of the undersigned vide Endst: No. 7366 Dated 16/10/2023 with the remarks that this office is not in position to grant leave & directed not to leave the station.
3. WHEREAS, you left the station without prior approval/sanction of the competent authority w.e.f 07/10/2023.
4. WHEREAS, you were report absent by principal GHSS Karak vide Endst No.577 dated 10-10-2023.
5. Now I am satisfied that you are inefficient and guilty of misconduct according to rule 3 (a),(b),(d) due to the following reasons specified in of the said rule:
 - (a). You are inefficient
 - (b). You are guilty of misconduct
 - (c). You remain guilty of habitually prolong absent from duty without prior approval of the Competent authority.
6. You are, therefore, required to show cause as to why not you should be proceeded under the Khyber Pakhtunkhwa Government Servant (E&D Rules) 2011, and also intimate whether you want to be heard in person.
7. If no reply to this show cause is received within 7 days of its delivery, it shall be presumed that you have no defence to put in and in that case an Ex-parte decision shall be taken against you.

(ZAHOOR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) KARAK

Dated 24/10/2024

Endst No. 382-86
Copy to the:

1. District accounts Officer Karak.
2. Principal/ Head Master Concerned.
3. Budget & Accounts Officer Local Office.
4. Mr. Muhammad Fayaz CT GHSS Karak.
5. Office Copy

DISTRICT EDUCATION OFFICER
(MALE) KARAK



OFFICE OF THE
DISTRICT EDUCATION OFFICER MALE KARAK
ADDRESS: KDA KARAK

OFFICE ORDER

Whereas; Mr Muhammad Fayaz, CT GMS Official Colony Karak, you applied for NOC and study leave for the period w.e.f 01-10-2023 to to 30-09-2027 (4 years), which was regretted in the light of SO letter No. SO (S/M) E& SED/6-4/2022/Noc for Phd/Ph.D dated 03-08-2022 by the undersigned with the remarks that this office is not in a position to issue NOC/sanction leave to any teacher as the current academic session is in progress and the precious time of student is suffering. But you left the station and went to China for pursuing higher studies without approval of the competent authority as reported by Principal GHSS Karak vide letter No. 577 dated 10-10-2023.

And Whereas; you were reported willfully absent from duty w.e.f 07-10-2023 by EMA and Principal GHSS Karak vide letter No. 28 Dated 02-02-2024.

And Whereas; show cause notice was issued to you vide this office Encl No. 382 Dated 30-01-2024 and 382/86 Dated 24-01-2024 in accordance of Efficiency and Disciplinary rule 2011, but you neither submitted any reply nor appeared in person till date.

Now, therefore, I Zahoor Khan, District Education Officer Male Karak as a competent authority am fully satisfied that you have committed the acts/ omissions specified in the rule - 3(a) (b) and (d) of the aforesaid rules and imposed major penalty "Removal from Service" upon you Mr Muhammad Fayaz, CT GMS Official Colony Karak, under E & D rules 2011 wef 07-10-2023.

Note: Necessary entry to this effect should be made in his service book.

-Sd

(ZAHOOR KHAN)
DISTRICT EDUCATION OFFICER
MALE KARAK

Dated 14 March 2024

Encl No. 277-81 ADEO Pry/ Removal
Copy to the:

- 1. DMO EMA Karak
- 2. District Account Officer Karak
- 3. DDEO Male Karak with the direction to recover the amount of overpayment if any made to him under intimation to this office.
- 4. Official concerned
- 5. Office Copy

DISTRICT EDUCATION OFFICER
MALE KARAK

Annex

D

20

To,

The Director Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Subject: **Departmental Appeal against the removal from service vide District Education office
Male Karak office order No. 1277-81/ADEO Pry/Removal dated 14 March 2024**

Respected Madam,

It is stated that I Muhammad Fayaz CT GMS Official Colony Karak applied for NOC and Study leave for four (4) years w.e.f 01/10/2023 to 30/09/2027, application was duly signed by honourable principle on 12th Sep 2023 and forwarded it to DEO (Male) office Karak for further proceeding but my application was intentionally delayed. I have total six (6) years & six (6) months service and I am fully eligible for study leave for four (4) years according to relevant rules (Application attached).

Now, District Education Officer Male Karak issued office order No. 1277-81/ADEO Pry/Removal dated 14th March 2024 (office order attached) by imposing major penalty of Removal from service without fulfilling codal formalities as per rules. As mentioned in the office order, show cause notice was issued vide office order No. 382-86 dated 24th Jan 2024 which is not received to me till date and also according to rules, two show cause notices will be issued and it will be further published in two (2) leading news papers so the same legal procedure was not followed and I was removed from regular service without opportunity of personal hearing.

Throughout my tenure with the education department I have maintained a commendable record of service, characterized by dedication, diligence and commitment to my duties.

Therefore in view of all the above it is requested to accept my departmental appeal and direct District Education Officer Male Karak to withdraw office order No. 1277-81/ADEO Pry/Removal dated 14th March 2024, and further request to sanction my study leave as per rules please.

Date: 15th March 2024

Yours Sincerely,

M. Fayaz

Muhammad Fayaz,
CT GMS Official Colony,
Karak.
Contact# 03319807944

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KARAK

No. 418 /ADEO Secy.

Dated Karak the 9.15 /2024

To

The Director Elementary & Secondary Education
Khyber Pakhtun Khwa, Peshawar

(21)

Subject: DETAIL REPORT IN RESPECT OF MR. MUHAMMAD FAYAZ CT-15 GMS OFFICIAL COLONY KARAK

Memo:

Reference to your office letter No. 4504/F.No.28/Appeals/Estb-1 dated Peshawar the 03-04-2024 on the subject cited above

Mr. Muhammad Fayaz CT-15 was appointed vide this office No.2423-26 on 28-04-2017 against the post of CT and was working on regular basis at GMS Official Colony Karak.

I. He applied for Study leave for a period of Four (4) years (w.e.f 01/10/2023 to 30/09/2027) which was regretted by the office of the undersigned vide Endst: No. 7366 Dated 16/10/2023 with the remarks that this office is not in a position to grant leave & directed him not to leave the station. (Annex A)

II. He left the station without prior approval/sanction of the competent authority w.e.f 07/10/2023.

IV. He was reported absent by principal GHSS Karak vide Endst No.577 dated 10-10-2023. (Annex B)

V. Show cause notice was served upon him vide office Endst No. 382-86 dated 24-01-2024 with the direction to submit reply within 7 days but neither did he submit reply in written nor appeared in person. (Annex C)

In the light above he was removed from service w.e.f 07/10/2023 vide office Endst No.1277-81 A/DEO/Removal dated 14-03-2024. (Annex D)

Detailed report along with relevant record is submitted for further necessary action please.

DISTRICT EDUCATION OFFICER
(MALE) KARAK

Endst. Even No. & Date
Copy for information forwarded to the;

1. Principal GHSS Karak/ HM GMS Official Colony Karak.
2. Office Copy.

DISTRICT EDUCATION OFFICER
(MALE) KARAK



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

No. 81 /F.No/28/Appeals/Estab M-I
Dated Peshawar the 30-07 2024.

REMINDER-I

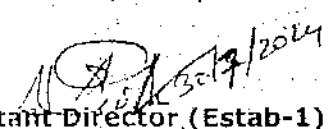
To

The District Education Officer
(Male) Karak.

Subject: **PERSONAL HEARING**

Memo:

In continuation of this office letter No. 3016 Dated 29-05-2024 and I am directed to refer to your office letter No. 413 Dated 09-05-2024 on the subject noted above and to ask your good-self to inform Muhammad Fayaz Ex-CT (BPS-15) GMS Official Colony District Karak to appear before Additional Director (Estab: Male) Directorate of E&SE Khyber Pakhtunkhwa Peshawar on 09-08-2024 at 11:00 AM along-with all relevant record.


Assistant Director (Estab-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Copy forwarded to the: -

1. P.A to Director Elementary and Secondary Education local office.

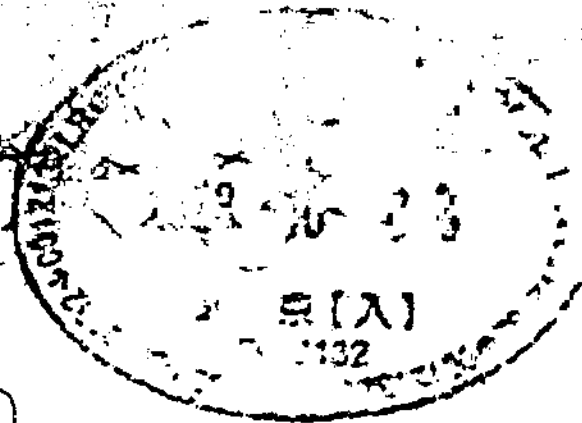
Assistant Director (Estab-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

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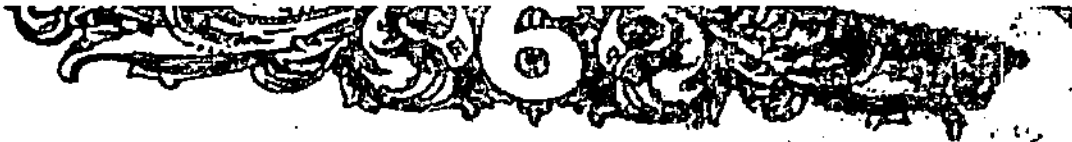
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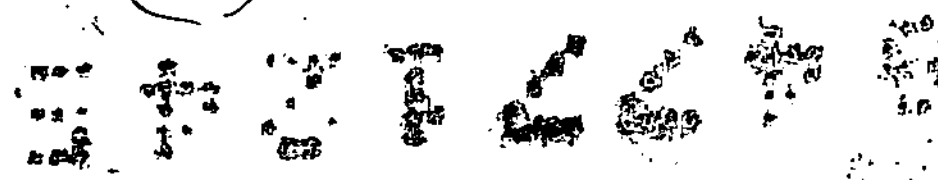


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Registered: Annex F
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

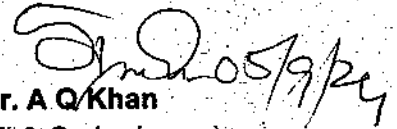
No. 428 / File: 608/ RTI/P.F. Muhammad
Fayaz/ Karak/2024
Dated Peshawar the: 05, 9 /2024

To

**Muhammad Fayaz S/O Taj Muhammad,
Government Higher Secondary School Karak.
Cell No. 0331-9807944**

Subject: - PROVISION OF INFORMATION UNDER RTI ACT 2013.

I am directed to refer to your application dated 30.08.2024 received to this office vide Dairy No: 1177 dated 30.08.2024 on the subject cited above and to state that your appeal for reinstatement dated 29.05.2024 has been **seen & filed** by the Worthy Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.


Dr. A Q Khan
AD (RTI & Ombudsman)

Endst: No. _____ /

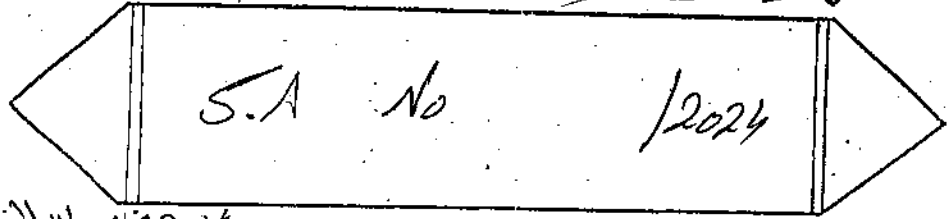
Copy forwarded to the: -

1. P A to Director E&SE KPK Peshawar.


Dr. A Q Khan
AD (RTI & Ombudsman)

(28)

بعدالت سروس انٹرنیشنل KPI لیتناؤ



2024ء پنجاب ایبلٹ

بنام ڈائریکٹریٹ E&SE وٹیرنری

محمد ضیاء

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام لیتناؤ کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو رضی نامہ کرنے و تقرر ثالت ہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک در و پیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائز التوائے مقدمہ کے سبب سے وہ ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا اوکالت نامہ لکھد یا کہ سندر ہے۔

المرقوم _____ ماہ _____ 2024ء

واہ الع

کے لئے منظور ہے۔

لیتناؤ

بمقام

Muhammad