

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No.4674 of 2020

Date of Institution ... 05/05/2020

Date of Decision ... 09.12.2021

Iqbal Noor, Anesthesia, Technician, District Headquarter Hospital,
Bajaur at Khar, District Bajaur. ... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary, Health
Department, Peshawar and others ... (Respondents)

Present.

Mr. Fazal Shah Mohammad,
Advocate ... For appellant.

Mr. Muhammad Adeel Butt,
Addl: Advocate General, ... For Respondents.

MR AHMAD SULTAN TAREEN ... CHAIRMAN
MR. SALAH-UD-DIN, ... MEMBER(J)

JUDGMENT

AHMAD SULTAN TAREEN, CHAIRMAN:-The appellant named
above invoked the jurisdiction of this Tribunal seeking relief based on
the prayer as copied herein below:-

*"On acceptance of this Service appeal
Respondents may kindly be directed to issue
separate Anesthesia Technician and anesthesia
technician Degree Holders Seniority List for
Tribal merged Districts and allocate Seats for
their Promotions to anesthesia Technologist BPS-*

17 for those merged district employees who are appointed after 2008 notification (in agency cadre), by making Promotions accordingly."

2. Brief facts as averred in the Memo. of appeal are that the appellant is Anesthesia Graduate, who was appointed as Anesthesia Technician on 29-12-2009. The appellant is highly qualified, has acquired his BS Paramedics (Anesthesia Technology) on in-service reserve seats from Khyber Medical University Peshawar in Session 2013, after he applied for the same through proper channel and accordingly was selected after test and interview for the same. The appellant was relieved of his duties and was directed to join the said course vide Office Order dated 26-12-2012. Since then, he has performed his duties with honesty and full devotion and to the entire satisfaction of his high ups. The name of appellant was present in the seniority list of 2017. In 2019 final Anesthesia Technician seniority list issued, but the appellant's name was dropped. The appellant submitted appeal for re-inclusion but the same was not responded. The appellant then submitted complaint on citizen portal, which was responded. The reply of DGHS is as follows "According to government notification NO.SOR-VII/E&AD/1-4/2008 Dated march 2009 the FATA employees has been declared separated cadre (agency cadre) with separated seniority list." That thereafter the appellant submitted appeal for the issuance of separated Anesthesia Technician and Anesthesia Technician Degree Holders seniority list of merged Districts (who are appointed after 2008 notification) and allocation of seats for promotion accordingly which was duly forwarded however the same

At Durrani

has not been responded so far despite the lapse of more than ninety days. This action of the respondents of not issuing separate Anesthesia Technician Degree Holder seniority list and non allocation of seats for promotion is against the law, facts and principles of justice, hence the present appeal

3. We have heard the arguments and perused the record

4. Learned counsel for the appellant has argued that the omissions and commissions of respondents are illegal and void *ab-initio*; that mandatory provisions of law have been violated by the respondents and the appellant has not been treated in accordance with law and rules on the subject; that the appellant has been subjected to suffer for no fault, as in the seniority list of 2017 his name was present, while he was excluded from the seniority list of 2019 and he was told that FATA employees have been declared Separated Cadre (Agency cadre) and Separated seniority list, but even separate list is not issued till date; that as per Notification dated 15-05-2018, the ratio in higher grade for availing promotion of paramedics staff was enhanced which was also calculated accordingly, but no seat till date has been allocated for such staff of merged Districts (Agency cadre); that the respondents have deprived the appellant of his due seniority by making him rolling stone and even excluding him and also not issuing separate list; that even as per rules notified on 10-05-2016, the appellant is entitled for promotion to Anesthesia Technologist BPS-17 if separated list is issued and seats are allocated accordingly; that valuable rights had accrued in favor of the appellant from which he could not be deprived and more

Perused

particularly at the whims of someone, that the appellant has about 11 years of service with unblemished service record.

5. Learned Addl: Advocate General while rebutting the arguments of learned counsel for the appellant has argued that the appellant has got neither cause of action nor *locus standi* to file the instant Appeal; that the Appellant has filed the instant appeal just to pressurize the respondents; that the seniority lists of Anesthesia Technicians BPS-12 and Anesthesia Technicians Degree Holders have been prepared, wherein the name of the appellant can be seen at Serial No. 249 and at Serial No. 16 respectively; that the Appellant has been included in both the seniority lists of Anesthesia Technician, while rest of the contents of corresponding para of Appeal are incorrect hence denied; that Appellant name has been added in the seniority list as per law and promotions will also be done as per the law, rules, procedure and on his turn.



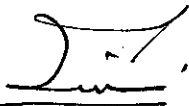
6. According to the prayer of the appellant, he seeks that the respondents may be directed to issue separate Anesthesia Technician and Anesthesia Technician Degree Holder seniority list for Tribal Merged Districts and allocate seats for their promotion to Anesthesia Technologists BPS-17 for those merged district employees, who were appointed after 2008 notification (in agency cadre). To explain his case in the factual account, he submitted that he is anesthesia graduate having required BS-Paramedics (Anesthesia Technology). He further stated that he was present in 2017 seniority list. In 2019 final anesthesia technician seniority list was issued but his name was dropped. He submitted complaint on citizen portal. The reply of the

Director General Health Services was that according to Govt. Notification dated March 2009, the FATA employees have been declared (agency cadre) with separated seniority list. He further submitted that action of the respondents not issuing separate Anesthesia Technician Degree Holder seniority list and non allocation of seats for their promotion is against the law, facts and principle of justice. The respondents in their parawise comments disclosed that the seniority list of Anesthesia Technician BPS-12 and Anesthesia Technician Degree holder have been prepared, wherein the name of the appellant can be seen at S.No.249 and S.No.16 respectively. According to copy of the seniority list as annexed with the reply, the allocation of the seniority to the appellant in light of the said reply is based on fact. The copy of the notification dated 10.05.2016 about mode and manner of the appointment in the cadre of the appellant has been annexed with the appeal. Accordingly, there are seven (07) posts in the cadre. The lowest in the cadre is technician including the Clinical Technician Anesthesia i.e the post held by the appellant. For carrier progression upward from the post of technician there is a post of Senior Technician including the Senior Clinical Technician Anesthesia. The said post is filled by promotion on the basis of seniority-cum-fitness from among the technician with at least two (02) years service as such in the relevant technology. For this purpose the seniority list as annexed with reply of the respondents contains the name of the appellant at serial No.249. Among the seven posts enumerated in the notification dated 10.05.2016 there is a post of Technologist at S.No.04 which is two steps higher than the post

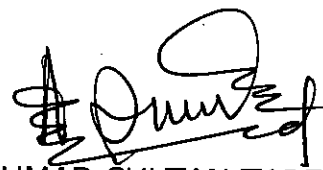


Technician. For appointment on the said post different quotas have been provided including 23% quota by promotion on the basis of seniority-cum-fitness from among the Chief Technician, Senior Technician and Technician having qualification prescribed for initial recruitment with three (03) years service as such in the relevant technology. For the purpose of maintenance of joint seniority list of Chief Technicians, Senior Technicians and Degree Holder Technicians is given. Accordingly, the degree holder technicians have been given double right of promotion. The appellant in his capacity as Technician has got the right of promotion to the next higher post i.e senior technician on the basis of seniority-cum-fitness and being degree holder technician. He has been given the right of promotion to the post of technologist as discussed above and his name is reflected in both the seniority lists annexed with the reply of the respondents. The case brought by appellant through this appeal is not fortified by any cogent ground for acceptance of his prayer.

7. For what has gone above this appeal is dismissed. There is no order as to cost . File be consigned to record room.



(SALAH-UD-DIN)
Member(J)





(AHMAD SULTAN TAREEN)
Chairman

ANNOUNCED

09.12.2021

4674/20

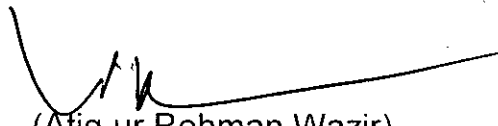
A No. 4674 /202 00 S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	09.12.2021	<p><u>Present.</u></p> <p>Mr. Fazal Shah Momand, ... For appellant Advocate</p> <p>Mr. Muhammad Adeel Butt, ... For respondents. District Attorney</p> <p>Vide our detailed judgment, this appeal is dismissed. There is no order as to cost . File be consigned to record room.</p> <p> (SALAH-UD-DIN) Member(J)</p> <p> (AHMAD SULTAN TAREEN) CHAIRMAN</p> <p><u>ANNOUNCED</u> 09.12.2021</p>

02.12.2021

Counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Request for adjournment was on behalf of appellant; granted. To come up for arguments on 09.12.2021 before D.B.




(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

20.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 12.08.2021 for the same as before.


Reader

12.08.2021

Appellant present through counsel.

Javid Ullah learned Assistant A.G for respondents present.

Former submitted rejoinder with a request for adjournment. Request is acceded. To come up for arguments on 29.09.2021 before D.B.


(Rozina Rehman)
Member (J)


Chairman

29-9-21

DB is on Tour case to come up
For the same on Dated. 20-1-22

Noted
H. Ullah
Hickjett
C/o Fazel Sher
Asst
18/11/21

*
Recorded

4674/2020

08.10.2020

Counsel for the appellant and Addl. AG alongwith Hazrat Shah, Superintendent for the respondents present.

Representative of the respondents seeks further time to submit reply/comments. Last opportunity is granted to the respondents for submission of reply/comments on 03.12.2020 before S.B.


Chairman

03.12.2020

Counsel for the appellant and Addl. AG alongwith Saleem Javed, Litigation Officer for the respondents present.

Representative of the respondents has furnished parawise comments on behalf of the respondents. The case is assigned to D.B for arguments on 13.01.2021. The appellant may submit rejoinder, within a fortnight, if so advised.


Chairman

13.01.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Due to COVID-19, the case is adjourned for the same on 20.04.2021 before D.B.


READER

0.06.2020

Counsel for the appellant present.

Contends that the name of appellant was duly included in the seniority list pertaining to qualified Paramedics Degree Holders Anesthesia in the year 2017. However, in the similar list in the year 2019 the name of appellant was omitted. The appellant departmentally applied for inclusion of his name in the relevant seniority list and also requested for preparation of separate seniority list for his class of employees but to no avail. The inaction on the part of respondents has marred valuable services ^{rights} of the appellant, it is added.

In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 28.07.2020 before S.B.

~~Appellant deposited~~
Security & Process Fee


Chairman

28.07.2020

Counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks time to contact the respondents and furnish reply/comments. Adjourned to 22.09.2020 on which date the requisite reply/comments shall positively be furnished.

~~Appellant deposited~~
Security & Process Fee


Chairman

22.09.2020

Counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks further time to contact the respondents and furnish the reply/comments. Adjourned to 08.10.2020 on which date the requisite reply/comments shall be positively submitted.

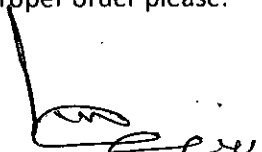


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Service Appeal No.- 4674 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/05/2020	<p>The Appeal of Mr. Iqbal Noor resubmitted today i.e. 18.05.2020 by Mr. Fazal Shah Momand Advocate may be entered in the institution register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for Preliminary Hearing to be put on <u>10/06/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: center;">JUDGE</p>


P-16

The appeal of Mr. Iqbal Noor submitted today i.e. 05.05.2020 by Mr. Fazal Shah Mohmand, Advocate is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.

- 1- The appeal not signed by the appellant which may be signed.
- 2- Page-07 and 17 of the appeal are illegible which may be replaced by legible/better one.

No. 1099 /S.T,


Dt. 6-5- /2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Shah Mohmand, Advocate Peshawar.

R/Sis,

Resubmitted after completion:


18/5/2020 (Adv)

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 4674/2020

Iqbal Noor.....**Appellant**

V E R S U S

Govt. & Others.....**Respondents**

I N D E X

S. No	Description of documents	Annexure	Pages
1.	Service Appeal		1-3
2.	Copy of Office Orders dated 29-12-2009 ,26-12-2012, Certificate dated 28-04-2006 & Degree	A, B & C	4-8
3.	Copy of Seniority list, appeal dated 20-12-2019 and reply of DGHS on citizen portal	D, E & F	9-15
4.	Copy of departmental appeal	G	16
5.	Copy of Notification dated 15-05-2018	H	17-18
6.	Copy of rules	I	19-25
7.	Wakalat Nama		26

Dated: 24-04-2020

Iqbal Noor
Appellant

Through

Fazal Shah Mohmand
Fazal Shah Mohmand

Advocate Supreme Court.

OFFICE:-Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301
8804841

Email:-fazalshahmohmand@gmail.com

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 4674/2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3395

Dated 5-5-2020

Iqbal Noor, Anesthesia Technician, District Headquarter Hospital,
Bajaur at Khar Merged District Bajaur.....**Appellant**

V E R S U S

1. Govt. of Khyber Pakhtunkhwa, through Secretary, Health Department Peshawar.
2. Director General, Health Services Khyber Pakhtunkhwa, Peshawar.
3. Director Health merged Districts Warsak Road Peshawar.

.....**Respondents**

APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR THE ISSUANCE OF SEPARATED ANESTHESIA TECHNICIAN AND ANESTHESIA TECHNICIANS DEGREE HOLDERS SENIORITY LIST FOR TRIBAL MERGED DISTRICTS, AND ALLOCATION OF SEATS FOR THEM FOR PROMOTIONS TO ANESTHESIA TECHNOLOGIST BPS-17, FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINTY DAYS.

PRAYER:-

On acceptance of this Service Appeal respondents may kindly be directed to issue separated Anesthesia Technician and anesthesia technician Degree Holders Seniority List for Tribal merged Districts and allocate Seats for their Promotions to anesthesia Technologist BPS- 17 for those merged district employees who are appointed after 2008 notification (in agency cader), by making Promotions accordingly.

Respectfully Submitted:-

1. That the appellant is Anesthesia Graduate was appointed as Anesthesia Technician on 29-12-2009 who is highly qualified, has acquired his BS Paramedics (Anesthesia Technology) on in-service reserve seats from Khyber Medical University Peshawar in Session 2013, after he applied for the same through proper channel and accordingly was selected after test and interview for the same. The appellant was relieved of his duties and was directed to join the said

Filed to-day
Registrar
05/05/2020

Submitted to -day
Registrar
18/5/2020

course vide Office Order dated 26-12-2012. **(Copy of Office Orders dated 29-12-2009 ,26-12-2012, Certificate dated 28-04-2006 & Degree is enclosed as Annexure A, B & C).**

2. That since then he performed his duties with honesty and full devotion and to the entire satisfaction of his high ups. The appellant was present in 2017 seniority list, In 2019 final anesthesia technician seniority list issued, but the appellant name was dropped. The appellant submitted appeal for re inclusion but not responded. Then the appellant submitted complaint on citizen portal and responded. the reply of DGHS is as follows "According to government notification NO.SOR-VII/E&AD/1-4/2008 DATED march 2009 the FATA employees has been declared separated cader (agency cader) with separated seniority list". **(Copy of Seniority list, appeal dated 20-12-2019 and reply of DGHS on citizen portal is enclosed as Annexure D,E & F).**
3. That there after the appellant submitted appeal for the issuance of separated Anesthesia Technician and Anesthesia technician Degree Holders Seniority list of merged Districts (who are appointed after 2008 notification) and allocation of seats for promotion accordingly which was duly forwarded however the same has not been responded so far despite the lapse of more than ninety days. **(Copy of departmental appeal is enclosed as Annexure G).**
4. That this action of the respondents of not issuing separate Anesthesia Technician Degree Holder seniority list and non allocation of seats for promotion according is against the law, facts and principles of justice on grounds inter alia as follows:-

GROUND:-

- A. That the omissions and commissions of the respondents are illegal and void ab-initio.
- B. That mandatory provisions of law have been violated by the respondents and the appellant is not treated according to law and rules governing the subject.
- C. That the appellant has been subjected to suffer for no fault, as in the seniority list of 2017 his name was present, while he was excluded from the seniority list of 2019 and he was told that FATA employees has been declared Separated Cadre (Agency cader) and Separated seniority list, but even separate list is not issued till date.

- D.** That as per Notification dated 15-05-2018 the ratio in higher grade for availing promotion of paramedics staff was enhanced which was also calculated accordingly, but no seat till date has been allocated for such staff of merged Districts (Agency cader). **(Copy of Notification dated 15-05-2018 is enclosed as Annexure H).**
- E.** That the respondents have deprived the appellant of his due seniority by making him rolling stone and even excluding him and also not issuing separate list.
- F.** That even as per rules notified on 10-05-2016, the appellant is entitled for promotion to Anesthesia Technologist BPS-17 if separated list is issued and seats are allocated accordingly. **(Copy of rules is enclosed as Annexure I).**
- G.** That valuable rights had accrued in favor of the appellant from which he could not be deprived and more particularly at the whims of someone.
- H.** That the appellant has about 11 years of service with unblemished service record.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

Any other relief deemed appropriate in the circumstances of the case and not specifically asked for may also be granted in favor of the appellant.

Dated: 24-04-2020


Appellant

Through


Fazal Shah Mohmand

Advocate Supreme Court.

-4- "A"

**OFFICE OF THE
AGENCY SURGEON BAJAUR**

OFFICE ORDER

On the recommendation of departmental selection Committee, the competent authority is pleased to appoint Mr. Iqbal Noor s/o Mohammad Noor as Anesthesia Technician at BPS-09(3820-230-10720) at AHQ Hospital Khar against the vacant Post on the following terms and conditions:-

1. If he declared medical fit for this job
2. His appointment is purely on temporary basis (prescribed under Govt of NWFP) and can be terminated at any time with out any notice.
3. If he wants to resign from services, he will resign in written with 30 days notice or will forfeit one month pay in lieu thereof or will continue to serve the Government till the acceptance of his resignation by the competent authority.
4. he will be governed with such rules and regulations belong to such category of staff.
5. he shall not indulge himself in any trade, business or any other activity what so ever which has been declared prohibited for the Government servant in elaboration of civil servant Act 1973.
6. he will not be entitle for any TA/DA for joining service and the offer shall be automatically held cancelled if she failed to join the service in 15 days after the receipt of this offer.

If he accepts the above terms and conditions he is directed to report to the Medical Superintendent AHQ Hospital Khar for duty.

Sd/XXXXXXXXXXXXX
AGENCY SURGEON
BAJAUR AT KHAR

No. 1998-2000 /PF/C-5/BJR. dated 29/12/2009

Copy to the: -

1. Medical Superintendent AHQ Hospital Khar for information and necessary action please
2. Agency Accounts Officer Bajaur at Khar for information and necessary action please
3. Mr. Iqbal Noor s/o Mohammad Noor n/o Barang Bajaur for compliance.

AGENCY SURGEON
BAJAUR AT KHAR

ATTESTED
TO BE TRUE COPY

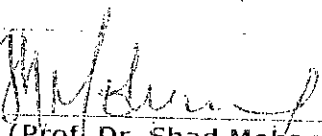
No. 20356/Dir/AA&QA/KMU
Date: November 23, 2012

S#	Name & Parentage	Speciality	Designation
1	Iqbal Noor Khan s/o Muhammad Noor	Anesthesia	Anesthesia Technician, Agency Headquarter Hospital, Khar, Bajaur Agency.
2	Syed Gulzar Shah s/o Syed Ashiq Shah	Cardiology	ECG Technician, KTH, Peshawar.
3	Mujahid Jan s/o Mohammad Zahid Jan	Pathology	Lab. Technician, Lal Qala Hospital, Lower Dir.
4	Nabiullah s/o Mir Azam Khan	Radiology	Clinical Technician, Radiology Deptt: LHR, Peshawar.

Subject: **ADMISSION IN B.SC. PARAMEDICS (04 YEARS) PROGRAM, SESSION SPRING 2013**

In continuation to this office letter no. 20353/Dir/AA&QA/KMU dated 25.10.2012. Reference to the advertisement for admission in B.Sc. Paramedics (04 Years) Program dated 10.08.2012 and interview held on 11.10.2012. You are hereby informed that you have been selected for admission in B.Sc. Paramedics (04 Years) program at KMU Institute of Paramedical Sciences, Peshawar.

Therefore, you are directed to deposit the admission dues amounting Rs. 70000/- (which can also be deposited in two equal installments @ Rs. 35000/- each) for the 1st semester upto **November 10, 2012**, to finalize your admission.


(Prof. Dr. Shad Mohammad)
Director (Academics, Admissions & Quality Assurance)
Dean Faculty of Nursing & Allied Health Sciences

Copy for information to:

1. The Secretary Health, Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar (with request to relieve the above mentioned candidates for the said program)
2. Director General Health, Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar, (with request to relieve the above mentioned candidates for the said program)
3. Medical Superintendent of the concerned hospitals (with request to relieve the above mentioned candidates for the said program)
4. Director PHSA, Peshawar
5. Coordinator/Principal, Institute of Paramedical Sciences, KMU, Peshawar
6. EDO Health, of the concerned district (with request to relieve the above mentioned candidates for the said program)
7. Agency Surgeon, Khar Bajaur Agency.
8. PSO to Vice Chancellor, KMU
9. PS to Registrar, KMU
10. PS to Treasurer, KMU
11. Office Record

ATTESTED
TO BE TRUE COPY

OFFICE OF THE MEDICAL SUPERINTENDENT
AHQ, HOSPITAL KHAR BJAUAR.

Phone 0942-221200

-6-

OFFICE ORDER.

Consequent upon his selection for B.Sc Paramedics (4 years) program vide Dean Faculty of Nursing & Allied sciences Peshawar letter No. 20396/Dir/AA&QA/KMU dated 2/11/2012 Mr. Iqbal Noor Khan Anesthesia Technician is hereby relieved of his duties and directed to join the course at an early date.

-sd/XXXXXXXX

Medical Superintendent,
AHQH, Khar Bajaur.

Dated Khar the 26/12/2012.

No. 3644-46 /PF/C-6/MS

Copy forwarded to the: -

1. Director Health Services FATA Peshawar for information w/r to his letter No. 18912/DHS/FATA dated 23/11/2012 received to this office through Mr. Iqbal Noor Khan Anesthesia Technician.
2. Dean Faculty of Nursing & Allied Health Science KMU Peshawar for information w/r to his above quoted order.
3. Official concerned.
For information & necessary action.

Medical Superintendent,
AHQH, Khar Bajaur.

ATTESTED
TO BE TRUE COPY



HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad Ph:9257508 Fax No.9257505

URL: www.hec.gov.pk

Director General
(Accreditation & Attestation)

-7- (B) (4)

No.8-61/HECA&A/2006

April 28, 2006

No.8-1/116/MAR/109/2006

TO WHOM IT MAY CONCERN

The Higher Education Commission recognizes all the Bachelor's degrees such as BE/B.Sc.Engg./B.S(Computer Engineering)/B.Sc. (Hons) Agri/ B.Pharm/ MBBS/BS(CS)/B.S (IT)/BBA (Hons.) and LL.B or equivalent held after 4-year/8 semesters of studies and upon qualifying minimum 136 credit hours with admission requirement as Intermediate or equivalent involving 12-year schooling as equivalent to M.A/M.Sc degrees awarded after 4 years of post-intermediate education (2-year B.A/B.Sc + 2-year M.A/M.Sc.) in general stream for the purpose of employment in B-17 and for higher education.

Attested

DIRECTOR

Higher Education Commission
Registral Centre, Islamabad

28-4-06
(Muhammad Javed Khan)

ATTESTED
TO BE TRUE COPY

BETTER COPY OF THE PAGE NO. 7
HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad Ph: 9257508 Fax No, 9257505

URL: www.hec.gov.pk

Director General
(Acceleration & Attestation)

No. S-6/HEC/A&A/2006/
April 28.2.06

No. S-1/HEC/MARCT/27.2.06

TO WHOM IT MAY CONCERN

The Higher Education Commission recognizes all the Bachelor's degree such as BE/B.Sc.Engg./B.S(Computer Engineering)/B.Sc. (Hons) Agrl./B.Pharm/MBBS/BS(CS)/B.S (IT)/BBA (Hons) and LL.B or equivalent held after __ year/8 semesters of studies and upon qualifying minimum 136 credit hours with admission requirement as Intermediate or equivalent involving 12-year schooling as equivalent to M.A/M.Sc degrees awarded after 4 years of post-intermediate education (2-year B.A/B.Sc + 2-year M.A/M.Sc) in general stream for the purpose of employment in B-17 and for higher education.

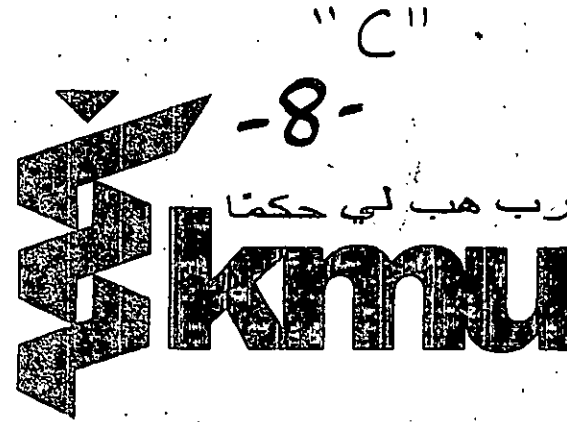
-Sd-

(Muhammad Javed Khan)

DIRECTOR
Higher Education Commissioner
Regional Centre Peshawar

ATTESTED

Serial No.: 170745/10846



Reg. No.: 2012/KMU/IPS-1/019

Session: Spring, 2013

KHYBER MEDICAL UNIVERSITY
PESHAWAR, PAKISTAN.

has conferred upon

IQBAL NOOR KHAN s/o MUHAMMAD NOOR


of KMU, Institute of Paramedical Sciences, Peshawar

the degree of

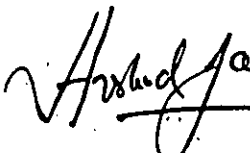
BS Paramedics (Anaesthesia Technology)

ATTESTED
TO BE TRUE COPY

Given this seventeenth day of March two thousand and seventeenth


Controller of Examinations


Registrar


Vice Chancellor

113" -8-

Checked By: Mirza
 Verified By: [Signature]
 Date of Entry: 31-08-2017

RS. 800
 CHAFIK RAHMAN
 Higher Education Commission
 Regional Centre, Peshawar
 (Government of Pakistan)
 157418-03 AUG 2018

-9- "D"



**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.**
No. 17281-So /AE-VII
Dated. 02/11/2017

Anesth

- To:
- 1 All Principals of Medical Colleges in KPK
 - 2 The Principal PGPI, Buddini Road Douran Pur, PIMTs, Di Khan, Abbottabad, Swat
 - 3 All Hospital Directors of Medical Teaching Institutions in KPK
 - 4 Director General Provincial Health Services, Academy, KPK Peshawar
 - 5 The Director Health Services, FATA Peshawar
 - 6 The Medical Superintendent, Sagar Group of Teaching Hospital Swat
 - 7 The Medical Superintendent, Maula Ambar Shah Memorial Hospital, GT Road Peshawar
 - 8 The Medical Superintendent, Govt. NKEI Memorial Hospital, Kehat Road Peshawar
 - 9 The Medical Superintendent, Services Hospital, Peshawar
 - 10 The Medical Superintendent, SGTs Memorial Hospital, Peshawar
 - 11 The Medical Superintendent, Sarda Hospital for Psychiatric Diseases Peshawar
 - 12 The Medical Superintendent, Central & Mental Hospital Dadar, Mansehra
 - 13 All Medical Superintendents, Emu, AIBU Hospitals in KPK/FATA
 - 14 All Agencies working in FATA, FR
 - 15 All District Health Officers, Khyber Pakhtunkhwa

Subject: FINAL SENIORITY LIST OF DEGREE HOLDERS (CLINICAL TECHNICIANS) (ANESTHESIA) BS-12 (SR. CLINICAL TECHNICIANS) (ANESTHESIA) BS-14 (CHIEF CLINICAL TECHNICIANS) (ANESTHESIA) BS-16 OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA

Memo: For information and circulation amongst all the agencies/Institutions working under your control.

Note: The Final seniority list has also been downloaded from the website www.dhiskp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

Cc: PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar

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12	Inayatullah	Muhammad ismail	25.04.188	2014	3110/5000	62.2	University of Peshawar	QHMC Nowshera	Charsadda	20.12.1969	19.12.2029
13	Mustafa	Said faqeer	21.02.2008	2014	3058/5000	61	University of Peshawar	DHQ Dir lower	Dir lower	03.02.1981	02.02.2041
14	Said rohulamin	Said walayt shah	16.02.1999	2014	3032/5000	60.54	University of Peshawar	Service hospital Peshawar	Charsadda	30.01.1975	29.01.2035
15	Asfandiyar khan	Bakth bedar khan	04.05.1993	2014	2987/5000	59.74	University of Peshawar	W & Ch hospital bannu	Bannu	12.11.1973	11.11.2033
16	Muhammad ikramul atif	Fida hussain	06.02.1995	2014	2975/500	59.5	University of Peshawar	DHQ nowshera	Nowshera	12.04.1974	11.04.2034
17	Said Muhammad arif	Zainul abideen	16.02.1999	2014	2946/5000	58.92	University of Peshawar	DHQ charsadda	Charsadda	11.04.1976	10.04.2038
18	Muhammad ali shah	Masood ur rahman	27.04.1993	2014	2927/5000	58.54	University of Peshawar	Kth Peshawar	Nowshera	13.01.1970	12.01.2030
19	Nowshad khan	Mashooq jan	12.12.2006	2014	2853/5000	57.6	University of Peshawar	DHQ bajaur	Bajaur	10.04.1982	09.04.2042

Director General Health Services
Khyber pukhtunkhwa peshawar

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Final seniority list of qualified paramedics degree holders Anesthesia											
s.no	Name	F.name	Date of first appointment	Session of passing degrees	Total/obtain marks & division	%age	Board/university institution	Present posting	Domicile	Date of birth	Date of retirement
1	2	3	4	5	6	7	8	9	10	11	12
1	Arbab sikandar	Mir Ahmad khan	06/02/1995	2011	3455/5000	69.1	University of Peshawar	Kth Peshawar	Karak	02/02/1972	01.02.2032
2	Khurshaid	Noor khan	04.01.1990	2011	3350/5000	67.14	University of Peshawar	DHO swabi	Swabi	10.01.1970	09.01.2030
3	Shafiq urahman	Gul rahman	18.08.1992	2011	3351/5000	67.2	University of Peshawar	DHQH kda kohat	Karak	20.05.1971	19.05.2031
4	Muhammad ajmal	Muhammad afzal	03.10.1996	2011	3308/5000	66.16	University of Peshawar	HMC Peshawar	Charsadda	16.01.1997	15.01.2033
5	Iqbal noor khan	Muhammad noor	01.01.2010	2013	3.51	87.75	KMU	Bajaur	Bajaur	01.01.1985	31.12.2024
6	Muhammad Atiq	Saiful malook	11.08.2007	2013	3.38	84.5	KMU	DHQ Batkheela	Malakand	31.03.1983	30.03.2043
7	Abrar ahmad	Saiful islam saif	07.04.2009	2014	3308/5000	66.16	University of Peshawar	DHQ nowshera	Nowshera	02.04.1982	01.04.2042
8	Idrees khan	Nisar muhammad	08.04.1987	2014	3259/5000	65.18	University of Peshawar	SGTH swat	Charsadda	15.11.1969	14.11.2029
9	Gohar ali	Sardar ali	15.09.1992	2014	3255/5000	65.1	University of Peshawar	SGTH swat	Swat	13.10.1972	12.10.2032
10	Zahoor ahmad shah	Bakth zada	01.03.2009	2014	3158/5000	63.16	University of Peshawar	STh swat	Swat	01.02.1984	31.01.2044
11	Hussain akbar	Muhammad akbar	04.01.2005	2014	3122/5000	62.44	University of Peshawar	DHQ parachinar	Kurram	15.03.1973	14.03.2033

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The

Director General Health Services,
Khyber Pukhtunkhwa Peshawar .

-14- "E"

Subject: Appeal for the exclusion of non eligible degree holder (Clinical technicians) from the qualified Anesthesia seniority list and justification of our position in the list.

Respected sir,

With great veneration it is stated that we (Iqbal noor khan and Muhammad Atiq) done BS Anesthesia from KMU (IPMS) through proper channel (copy Attached). We were selected after test and interview on merit in the two inservice reserve seats. We were enrolled in 2013 and got degrees in March 2017.

Sir, in 2nd November 2017, the DGHS promotion cell issued the qualified Anesthesia list, in which we have the following observations.

- In the list we are positioned in 5th and 6th instead of 1st and 2nd because,
 - i. We have the highest academic percentage in the mention list (copy attached).
 - ii. Only we have done BS Anesthesia from KMU through proper channel (copy attached)
- In the list below 6th position up to 19th, they are enrolled in 2014 and the degrees are given in 2015. (copy attached)
 - i. Only one year duration and BS (Hon) four year degrees are given, one year duration it may be certificate not the degree.
 - ii. In there degrees Anesthesia are not written the paramedical Science is written which may be surgical laboratory etc.
There enrollment in the list is questionable.
 - iii. Below 6th upto 19th all are Batch fellow and inservice reserves sets in BS program are two.
 - iv. During regular service how all were selected for BS program ?
 - v. Majority of them are FA pass how they done there BS Anesthesia ?
- Through regular service with out proper NOCs and leaves how can they done there degrees? there degrees without proper channel has no values.

Therefore it is requested to keep us on the top position on the basis of above reality and excluded the **non illegible degree holder (FA pass, BS without proper channel and one year duration degree holders)** from the qualified Anesthesia seniority list and maintains HEC verification criteria.

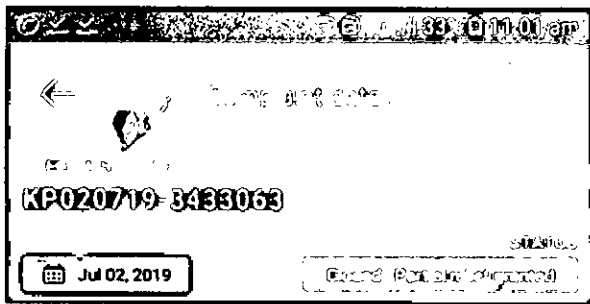
Thanking you an anticipation

Date 24/11/2017

Your's obedient

- 1: Iqbal noor Khan
Anesthesia Technician AHQH,
khar Bajaur Agency
- 2: Muhammad Atiq
Anesthesia Technician
DHQ Hospital Batkhella

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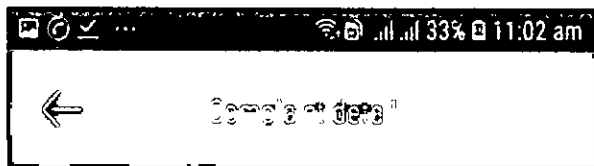


DISTRICT Bajaur
 TEHSIL Khar

COMPLAINT RELATED TO
 Primary Health

CATEGORY
 General Complaint

COMPLAINT DETAILS
 Complaint against amjad clark of paramedics promotion cell DGHS kp.. My name iqbal noor F/n muhd noor



My name iqbal noor F/n muhd noor anesthesia tech n DHQ hospital khar bjr. Sir i were given aplctn against unauthentic degree holders anesthesia tech..amjad was sympathatic with them.i were discussing seniority list with mehmod clark and suddenly amjad interfere and told me that u belong to FATA,therefore i m excluding u frm list and excluded me frm list. Sir,my previous complaints codes against amjad are (kp0605192579323,kp0304192120007,kp1603191884098.. My complaints closed with out relief and explanatory reply from amjad clark. He reactionnary excluded me frm anesthesia list.. New list issued at 28june my name is still excluded frm list. Therefore request to include me n seniority list and conduct inquiry againt amjad for punishment bcos before FATA murger my name was present n 2018 list & after murger my name excluded .amjad become personal with me .again request for justic..



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02
 JULY 2019
 FROM System
 STATUS Initiated
 TO Deputy Commissioner Bajaur

REMARKS
 Complaint has been assigned to Deputy Commissioner Bajaur

02
 JULY 2019
 FROM Deputy Commissioner Bajaur
 STATUS
 TO MS DHQ Hospital Bajaur

REMARKS
 Forwarded for necessary action, and redressal, please.



04
 JULY 2019
 FROM MS DHQ Hospital Bajaur
 STATUS Forwarded
 TO Director General Health Services

REMARKS
 Dear sir, The matter relates to your good office.

09
 JULY 2019
 FROM Director General Health Services
 STATUS Closed - Partial relief granted

REMARKS
 according to Govt: notification No. SOR-VII/ E&AD/1-4/2008-VOL-VII DATED March 2009 the FATA employee has been declared separated cadre and separated seniority list.



"F"
 -15-

-16- "G" 27

To

1. Secretary Health Services,
KPK Peshawar.

No: 596
14/01/2020

2. Director General Health services,
KPK Peshawar.

No: 1000/Σ11
14/01/2020

Subject; Appeal for issuance of separated Anesthesia technician Degree holder seniority list for tribal merged district, and allocation of seats for promotion from 60 allocated post of anesthesia to BPS-17.

Respected sir,

With great veneration it is stated that I am anesthesia technician in DHQ Hospital khar bajaur and done BS (Hons) in Anesthesia from KMU through proper channel.

The DGHS promotion cell issued the seniority list of anesthesia technician in 2017 and 2018; in which my seniority number was 257 and 264 respectively.

Sir, in 2019 another seniority list of Anesthesia Technician issued in which my name was dropped. therefore I submitted my written appeal (copy attached P-3) for re inclusion in seniority list but the DGHS (paramedics section) told me that after 2008 notification (Number SOR-V11/E&AD 1-4-2008-v11 dated march 2009) all technician appointed in EX FATA his a separate cadre with separated seniority list.

Then I submitted complaint in citizen portal and the remarks of DGHS as follows

According to Govt notification number (SOR-V11/E&AD 1-4-2008-v11 dated march 2009) FATA health employees has been declared separated cadre with separated seniority list (copy of reply of DGHS on citizen portal attached at P-2).

Therefore it is requested to

- 1- Issue separate seniority list of anesthesia technician degree holder who are appointed after 2008 notification in tribal merged districts (Ex FATA).
- 2- Allocate seats for promotion for anesthesia technician degree holders of merged district from 60 allocated posts of anesthesia for BPS-17 under the approved proposed enhancement ratio(copy attached p-4 & 5)

Thanking you an anticipation

Your obediently
Iqbal noor anesthesia technician
DHQ, Hospital Merged district bajaur

Date: 13-01-2020

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-17- "H"



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 15th May, 2018-

NOTIFICATION

No. SOH-III/B-60/2018. The competent authority has been pleased to approve the proposal to enhance the ratio/restructuring of Paramedics staff of Health Department in the higher grades for awarding promotion due to anomalous allocation in different scales as per following tables.

Scale-wise Existing ratio of posts of Paramedical Staff			Scale-wise Proposed ratio of posts of Paramedical Staff			Number of Posts
S. No	BPS	Percentage	S. No	BPS	Percentage	
1	Posts in BPS-12	20%	1	Posts in BPS-12	40%	5818
2	Posts in BPS-14	12%	2	Posts in BPS-14	30%	4362
3	Posts in BPS-16	25%	4	Posts in BPS-16	20%	2903
4	Posts in BPS-17	25%	5	Posts in BPS-17	8.0%	1164
5	Posts in BPS-18	12.5%	6	Posts in BPS-18	1.95%	284
6	Posts in BPS-19	0.0%	7	Posts in BPS-19	0.04%	63
7	Posts in BPS-20	0.0%	8	Posts in BPS-20	0.01%	15
		100%	Total:		100%	14542

2 The expenditure involved shall be debatable to function cum object classification 07-Health 076-Health-Administration-0761-Administration-076101-Administration current Financial Year 2017-18

3 The Administrative Department will amend service rules through SSRC accordingly.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst: No. SO(FR)FD/7-3/2018/17401/H

Dated: 11-05-2018

Copy forwarded to Accountant General, Khyber Pakhtunkhwa Peshawar for information & necessary action

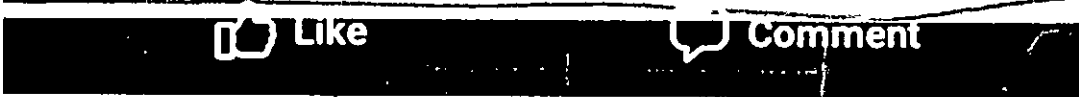
Section Officer (FR)
Finance Department

No. SOH-III/B-60/2018.

Dated: 15-05-2018

Copy forwarded to -

1. The Additional Chief Secretary (FATA) Khyber Pakhtunkhwa.
2. The Secretary to Governor, Khyber Pakhtunkhwa.
3. The Secretary FATA, Governor's Secretariat Peshawar.



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BETTER COPY OF THE PAGE NO. 17
GOVT. OF KHYBER PAKHUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 15th May, 2018

NOTIFICATION

No. SOH-III/B-60/2018. The Competent authority has been pleased to approve the proposal to enhance the ratio /restructuring of Paramedics staff of Health Department to the higher grades for availing promotion due to anomalous allocation in different scales as per following tables.

Scale existing ratio of posts of paramedical staff			Scale wise proposed ratio of posts of paramedical staff			Number of Posts
S.No.	BPS	Percentage	S.No.	BPS	Percentage	
1	Posts in BPS 12	50%	1	Posts in BPS 12	40%	5818
2	Posts in BPS 14	12%	2	Posts in BPS 14	30%	4362
3	Posts in BPS 16	3.5%	3	Posts in BPS 16	20%	2908
4	Posts in BPS 17	2.5%	4	Posts in BPS 17	8.0%	1164
5	Posts in BPS 18	1.85%	5	Posts in BPS 18	1.95%	254
6	Posts in BPS 19	0.09%	6	Posts in BPS 19	0.04%	05
7	Posts in BPS 20	0.04%	7	Posts in BPS 20	0.01%	01
		100%	Total			14542

2. The expenditure involved shall be debatable to function cum object classification 07-Health 076 Health Administration-0761 Administration-076101 Administration current Financial Year 2017-18.

3. The Administrative Department will amend service rules through SSRC accordingly.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst: No. SO(FR)FD/7-3/2018/17401/H

Dated 11-05-2018

Copy forwarded to Accountant General Khyber Pakhtunkhwa Peshawar for information & necessary action.

Section Officer (FR)
Finance Department

No. SOH-111/2-60/2018.

Dated 15-05-2018

Copy forwarded to:

1. The Additional Chief Secretary (FATA) Khyber Pakhtunkhwa.
2. The Secretary to Governor, Khyber Pakhtunkhwa.
3. The Secretary to Education Minister, Khyber Pakhtunkhwa.
4. The Secretary FATA Governor's Secretariat, Peshawar.

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Scale-wise Existing Ratio of Posts of Paramedical Staff			Scale-wise Proposed Ratio of Posts of Paramedical Staff			Number of Posts
S.No	BPS	Percentage	S.No	BPS	Percentage	
1.	12	80%	1.	12	40%	5818
2.	14	12%	2.	14	30%	4362
3.	16	3.5%	3.	16	20%	2908
4.	17	2.5%	4.	17	8.0%	1164
5.	18	1.86%	5.	18	1.95%	284
6.	19	0.09%	6.	19	0.04%	05
7.	20	0.04%	7.	20	0.01%	01
		100%	Total		100%	14542

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EXTRAORDINARY
GOVERNMENT

-19- "9"



REGISTERED NO. PIII
GAZETTE

x

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

NOTIFICATION

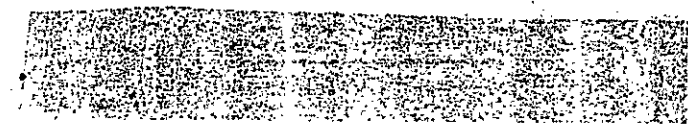
Peshawar dated the 10th May, 2016.

No.SOH-III/HD/3-5/2014 -In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf by the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Paramedical Staff in the Health Department specified in column 2 of the said Appendix..

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	Principal Technologist (i) Principal Clinical Technologist Dental; (ii) Principal Clinical Technologist Pharmacy; (iii) Principal Clinical Technologist Radiology; (iv) Principal Clinical Technologist Pathology;			By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PMC Technologists with five years service in BS-19 or seventeen years service in BS-17 and above as such in the relevant technology.

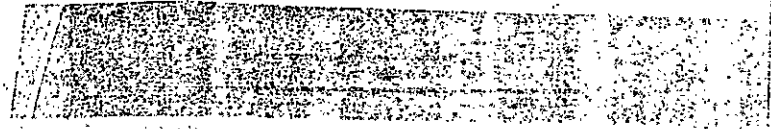
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	<ul style="list-style-type: none"> (v) Principal Clinical Technologist Anesthesia; (vi) Principal Clinical Technologist Cardiology; (vii) Principal Clinical Technologist Surgical; (viii) Principal Clinical Technologist Dialysis; (ix) Principal Clinical Technologist Physiotherapy; (x) Principal Clinical Technologist Pulmonology; (xi) Principal Clinical Technologist Gastroenterology; and (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology; and <p>Principle PHC Technologist</p> <ul style="list-style-type: none"> (i) Principal PHC Technologist (Multi Purpose); and (ii) Principal PHC Technologist (MCH). 			
2	<p>Chief Technologist</p> <ul style="list-style-type: none"> (i) Chief Clinical Technologist Dental; (ii) Chief Clinical Technologist Pharmacy; (iii) Chief Clinical Technologist Radiology; (iv) Chief Clinical Technologist Pathology; (v) Chief Clinical Technologist Anesthesia; (vi) Chief Clinical Technologist Cardiology; (vii) Chief Clinical Technologist Surgical; (viii) Chief Clinical Technologist Dialysis; (ix) Chief Clinical Technologist Physiotherapy; (x) Chief Clinical Technologist Pulmonology; (xi) Chief Clinical Technologist Gastroenterology; and (xii) Chief Clinical Technologist Ophthalmology/ Otorhinolaryngology; and 			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such in the relevant technology.</p>

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Deputy Secretary-II



<p>1. Name of the firm or individual</p> <p>2. Address of the firm or individual</p> <p>3. City, State, and Zip</p> <p>4. Telephone number</p> <p>5. Name of the principal officer or owner</p> <p>6. Title of the principal officer or owner</p> <p>7. Name of the principal officer or owner</p> <p>8. Title of the principal officer or owner</p> <p>9. Name of the principal officer or owner</p> <p>10. Title of the principal officer or owner</p>		
<p>11. Name of the firm or individual</p> <p>12. Address of the firm or individual</p> <p>13. City, State, and Zip</p> <p>14. Telephone number</p> <p>15. Name of the principal officer or owner</p> <p>16. Title of the principal officer or owner</p> <p>17. Name of the principal officer or owner</p> <p>18. Title of the principal officer or owner</p> <p>19. Name of the principal officer or owner</p> <p>20. Title of the principal officer or owner</p>		
<p>21. Name of the firm or individual</p> <p>22. Address of the firm or individual</p> <p>23. City, State, and Zip</p> <p>24. Telephone number</p> <p>25. Name of the principal officer or owner</p> <p>26. Title of the principal officer or owner</p> <p>27. Name of the principal officer or owner</p> <p>28. Title of the principal officer or owner</p> <p>29. Name of the principal officer or owner</p> <p>30. Title of the principal officer or owner</p>		

1. Name of the firm or individual

2. Address of the firm or individual

3. City, State, and Zip

4. Telephone number

5. Name of the principal officer or owner

6. Title of the principal officer or owner

7. Name of the principal officer or owner

8. Title of the principal officer or owner

9. Name of the principal officer or owner

10. Title of the principal officer or owner

	<p>Chief PHC Technologist</p> <p>(i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCI).</p>			
3	<p>Senior Technologist</p> <p>(i) Senior Clinical Technologist Dental; (ii) Senior Clinical Technologist Pharmacy; (iii) Senior Clinical Technologist Radiology; (iv) Senior Clinical Technologist Pathology; (v) Senior Clinical Technologist Anesthesia; (vi) SCT Senior Clinical Technologist Cardiology; (vii) Senior Clinical Technologist Surgical; (viii) Senior Clinical Technologist Dialysis; (ix) Senior Clinical Technologist Physiotherapy; (x) Senior Clinical Technologist Pulmonology; (xi) Senior Clinical Technologist Gastroenterology; and (xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and</p>	At least Second Class Master's Degree or B.SC Honours/ BS (04-years) in the relevant technology or equivalent qualification from a recognized University / Institution.	20-35 years	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and</p> <p>(b) fifty percent by initial recruitment.</p>
	<p>Senior PHC Technologist</p> <p>(i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCI).</p>			
4	<p>Technologist</p> <p>(i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Radiology; (iv) Clinical Technologist Pathology; (v) Clinical Technologist Anesthesia;</p>	At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution.	18-32 years	(a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;

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Deputy Secretary-II

Deputy Secretary-II



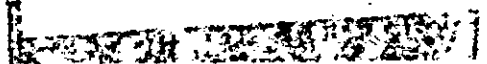
	<p>(vi) Clinical Technologist Cardiology; (vii) Clinical Technologist Surgical; (viii) Clinical Technologist Dialysis; (ix) Clinical Technologist Physiotherapy; (x) Clinical Technologist Pulmonology; (xi) Clinical Technologist Gastroenterology; and (xii) Clinical Technologist Ophthalmology / Otorhinolaryngology); and</p> <p>PHC Technologist</p> <p>(i) PHC Technologist (Multi-Purpose); and (ii) PHC Technologist (MCH).</p>			<p>(b) twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years service as such in the relevant technology.</p> <p>Note: For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:</p> <p>Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and</p>
5	<p>Chief Technician</p> <p>(i) Chief Clinical Technician Dental; (ii) Chief Clinical Technician Pharmacy; (iii) Chief Clinical Technician Radiology; (iv) Chief Clinical Technician Pathology; (v) Chief Clinical Technician Anesthesia; (vi) Chief Clinical Technician Cardiology; (vii) Chief Clinical Technician Surgical; (viii) Chief Clinical Technician Dialysis; (ix) Chief Clinical Technician Physiotherapy; (x) Chief Clinical Technician Pulmonology; (xi) Chief Clinical Technician Gastroenterology; and</p>			<p>(c) forty percent by initial recruitment.</p> <p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.</p>

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Deputy Secretary-II

Deputy Secretary-II

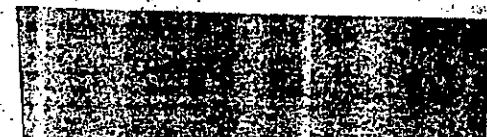
<p>(b) Every person who is engaged in the business of providing services to the public shall be licensed as a technician under the provisions of the Act.</p> <p>Every person who is engaged in the business of providing services to the public shall be licensed as a technician under the provisions of the Act.</p> <p>Every person who is engaged in the business of providing services to the public shall be licensed as a technician under the provisions of the Act.</p>		<p>(i) Chief Executive Officer (ii) Chief Financial Officer (iii) Chief Information Officer (iv) Chief Marketing Officer (v) Chief Operations Officer (vi) Chief Technology Officer (vii) Chief Human Resources Officer (viii) Chief Legal Officer (ix) Chief Compliance Officer (x) Chief Security Officer (xi) Chief Quality Officer (xii) Chief Environmental Officer (xiii) Chief Sustainability Officer (xiv) Chief Risk Officer (xv) Chief Governance Officer (xvi) Chief Ethics Officer (xvii) Chief Diversity Officer (xviii) Chief Inclusion Officer (xix) Chief Innovation Officer (xx) Chief Digital Officer (xxi) Chief Data Officer (xxii) Chief Analytics Officer (xxiii) Chief Artificial Intelligence Officer (xxiv) Chief Cybersecurity Officer (xxv) Chief Privacy Officer (xxvi) Chief Information Security Officer (xxvii) Chief Information Protection Officer (xxviii) Chief Information Governance Officer (xxix) Chief Information Ethics Officer (xxx) Chief Information Transparency Officer</p>
<p>(c) Every person who is engaged in the business of providing services to the public shall be licensed as a technician under the provisions of the Act.</p> <p>Every person who is engaged in the business of providing services to the public shall be licensed as a technician under the provisions of the Act.</p> <p>Every person who is engaged in the business of providing services to the public shall be licensed as a technician under the provisions of the Act.</p>		<p>(i) Chief Executive Officer (ii) Chief Financial Officer (iii) Chief Information Officer (iv) Chief Marketing Officer (v) Chief Operations Officer (vi) Chief Technology Officer (vii) Chief Human Resources Officer (viii) Chief Legal Officer (ix) Chief Compliance Officer (x) Chief Security Officer (xi) Chief Quality Officer (xii) Chief Environmental Officer (xiii) Chief Sustainability Officer (xiv) Chief Risk Officer (xv) Chief Governance Officer (xvi) Chief Ethics Officer (xvii) Chief Diversity Officer (xviii) Chief Inclusion Officer (xix) Chief Innovation Officer (xx) Chief Digital Officer (xxi) Chief Data Officer (xxii) Chief Analytics Officer (xxiii) Chief Artificial Intelligence Officer (xxiv) Chief Cybersecurity Officer (xxv) Chief Privacy Officer (xxvi) Chief Information Security Officer (xxvii) Chief Information Protection Officer (xxviii) Chief Information Governance Officer (xxix) Chief Information Ethics Officer (xxx) Chief Information Transparency Officer</p>



	<p>(xii) Chief Clinical Technician Ophthalmology, (Otorhinolaryngology); and <u>Chief PHC Technician</u></p> <p>(i) Chief PHC Technician (Multi-Purpose); and (ii) Chief PHC Technician (MCH).</p>			
6	<p><u>Senior Technician</u></p> <p>(i) Senior Clinical Technician Dental; (ii) Senior Clinical Technician Pharmacy; (iii) Senior Clinical Technician Radiology; (iv) Senior Clinical Technician Pathology; (v) Senior Clinical Technician Anesthesia; (vi) Senior Clinical Technician Cardiology; (vii) Senior Clinical Technician Surgical; (viii) Senior Clinical Technician Dialysis; (ix) Senior Clinical Technician Physiotherapy; (x) Senior Clinical Technician Pulmonology; (xi) Senior Clinical Technician Gastroenterology; and (xii) Senior Clinical Technician Ophthalmology/ Otorhinolaryngology); and</p> <p><u>Senior PHC Technician</u></p> <p>(i) Senior PHC Technician (Multi-Purpose); and (ii) Senior PHC Technician (MCH).</p>			By promotion, on the basis of seniority-cum-fitness, from amongst the Technicians and PHC Technicians with at least two years service as such in the relevant technology.
7	<p><u>Technician</u></p> <p>(i) Clinical Technician Dental; (ii) Clinical Technician Pharmacy; (iii) Clinical Technician Radiology; (iv) Clinical Technician Pathology; (v) Clinical Technician Anesthesia; (vi) Clinical Technician Cardiology; (vii) Clinical Technician Surgical; (viii) Clinical Technician Dialysis; (ix) Clinical Technician Physiotherapy; (x) Clinical Technician Pulmonology; (xi) Clinical Technician Gastroenterology; and</p>	<p>(i) Technician/PHC Technician : At least Second-Division Secondary School Certificate with Science from a recognized Board with Diploma in the relevant Paramedical Technology from Khyber Pakhtunkhwa Medical Faculty or Diploma in the relevant Paramedical technology from any recognized institution; provided that the same is registered with the Medical Faculty Khyber Pakhtunkhwa Peshawar; and</p>	18-30 years	By initial recruitment

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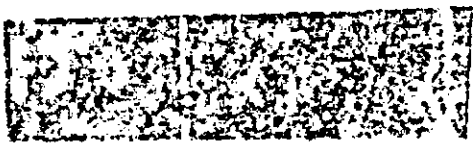
(Asfandyar Khattak)
Deputy Secretary-II



<p>(a) Chief Clinical Technician (Ophthalmology) and (Orthoptics) and (b) Chief PHC Technician (Multi-Topic) and (ii) Chief PHC Technician (MCH)</p>			
<p>Senior Technician (i) Senior PHC Technician (Multi-Topic) and (ii) Senior PHC Technician (MCH) Senior Clinical Technician (X-ray); Senior Clinical Technician (Histology); Senior Clinical Technician (Keratology); Senior Clinical Technician (Pathology); Senior Clinical Technician (Anatomical); Senior Clinical Technician (Cytology); Senior Clinical Technician (Surgical); Senior Clinical Technician (Dental); Senior Clinical Technician (Physiotherapy); Senior Clinical Technician (Pharmacology); Senior Clinical Technician (Microbiology) and Senior Clinical Technician (Ophthalmology) and (Orthoptics) and</p>			<p>They promote on the basis of merit and seniority and by providing the Technicians and PHT Technicians with at least five years service in the respective category.</p>
<p>Technician (i) Senior PHC Technician (Multi-Topic) and (ii) Senior PHC Technician (MCH) Senior Technician (Dental); Senior Technician (Physiotherapy); Senior Technician (Histology); Senior Technician (Keratology); Senior Technician (Pathology); Senior Technician (Anatomical); Senior Technician (Cytology); Senior Technician (Surgical); Senior Technician (Dental); Senior Technician (Physiotherapy); Senior Technician (Pharmacology) and Senior Technician (Ophthalmology) and</p>	<p>(i) Technician (Dental); Technician (Physiotherapy); Technician (Histology); Technician (Keratology); Technician (Pathology); Technician (Anatomical); Technician (Cytology); Technician (Surgical); Technician (Dental); Technician (Physiotherapy); Technician (Pharmacology) and Technician (Ophthalmology) and</p>	<p>18-30 years</p>	<p>Technician (Dental); Technician (Physiotherapy); Technician (Histology); Technician (Keratology); Technician (Pathology); Technician (Anatomical); Technician (Cytology); Technician (Surgical); Technician (Dental); Technician (Physiotherapy); Technician (Pharmacology) and Technician (Ophthalmology) and</p>

Deputy Secretary-II
 (Administration) Khind.

ATTEST
 10th May 2016



<u>PHC Technician</u>	(ii) <u>PHC Technician (MCH):</u>		
(i) PHC Technician(Multi-Purpose); and (ii) PHC Technician (MCH).	Secondary School Certificate with at least Second Division in Science from a recognized board and Diplomas of LHV and Midwifery from recognized Nursing Examination Board.		

SECRETARY TO

GOVERNMENT OF THE KHYBER PAKHTUNKHWA,
HEALTH DEPARTMENT.

Printed and published by the Manager,
Staty. & Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar

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(Asfandyar Khattaki)

15

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SECRETARY TO GOVT OF PAKHTUNKHWA DEPARTMENT HEALTH DEPARTMENT.


ite even

III/8-60/2016(Paramedics/Nurses/Service Rules)

Dated Peshawar, 11-05-2016

Copy forwarded for Information and necessary action to:-

1. The Director General Health Services Khyber Pakhtunkhwa.
2. The Director, Provincial Health Services Academy, Khyber Pakhtunkhwa.
3. All District Health Officers, Khyber Pakhtunkhwa.
4. The Registrar, Khyber Medical University, Peshawar.
5. The Director Health Services FATA.
6. All Hospital Directors/Medical Directors of Autonomous Institutions in Khyber Pakhtunkhwa.
7. All Medical Suprintendents DHQ/THQ Hospitals of Khyber Pakhtunkhwa.
8. All the Principals of Medical Colieges in Khyber Pakhtunkhwa.
9. The Dean PGMI Peshawar.
10. The Chief HSRU Health Department Khyber Pakhtunkhwa.
11. The Director Information Khyber Pakhtunkhwa.
12. The Deputy Director (I.T) Health, Khyber Pakhtunkhwa.
13. The Secretary, Medical Faculty, Khyber Pakhtunkhwa, Peshawar.
14. The Principal, Post Graduate Paramedical Institute, Peshawar.
15. The Principal, Post Graduate College of Nursing, Hayatabad Peshawar.
16. The Controlier, Nursing Examination Board, Peshawar.
17. PSO to Chief Secretary Khyber Pakhtunkhwa.
18. PS to Additional Chief Secretary (FATA) Peshawar.
19. PS to Secretary to Governor Khyber Pakhtunkhwa.
20. PS to Secretary to Chief Minister Khyber Pakhtunkhwa.
21. PS to Secretary to Government of Establishment Department.
22. PS to Secretary to Government of Finance Department.
23. PS to Secretary to Government of Law Department.
24. PS to Secretary, Public Service Commission, Khyber Pakhtunkhwa.
25. PS to Senior Minister for Health-Department.
26. The Manager, Government Printing Press, Peshawar.


 (Asfandiyar Khattak)
 Deputy Secretary-

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BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 4674 OF 2020

Iqbal Noor.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the Appellant has got neither cause of action nor locus standi to file the instant Appeal.
2. That the Appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant Appeal is against the prevailing Law and Rules.
4. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
6. That the Appellant has not come to the Tribunal with clean hands.
7. That the Appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant Appeal is bad for mis-joinder and non-joinder of the necessary parties.

ON FACTS:

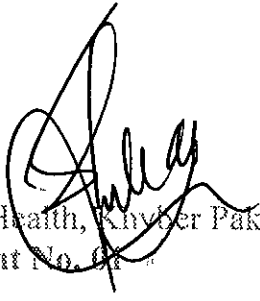
1. Para No. 1 pertains to record, hence no comments.
2. In reply to Para No. 2 it is submitted that the seniority lists of Anesthesia Technicians BPS-12 and Anesthesia Technicians degree holders have been prepared, wherein the name of the appellant can be seen at S. No. 249 and at S. No. 16 respectively (Relevant pages of the seniority lists are attached at Annex-A). Rest of the contents of the para pertains to record of service of the Appellant.
3. Para No. 3 pertains to record, and already replied in preceding para.
4. Para No. 4 is incorrect the same has already been explained in Para No. 2.

ON GROUNDS:

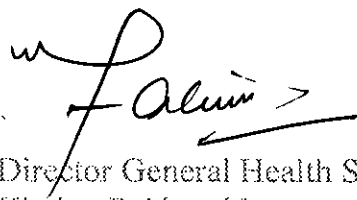
- A. Para-A is incorrect hence denied. Details are already furnished in Para No. 2 of Facts.
- B. Para-B is incorrect hence denied. The same has already explained in Para No. 2 of Facts.
- C. In reply to Para-C it is submitted that the Appellant has been included in both the seniority lists of Anesthesia Technician. Rest of the contents of corresponding para of Appeal are incorrect hence denied
- D. Para-D is correct to the extent of Notification, however as far as promotion is concerned, so the Appellant will wait for his turn according to the attached seniority lists.
- E. Para-E is incorrect the same has already been explained in preceding paras.
- F. Para-F pertains to record. Appellant name has been added in the seniority list as per law and promotions will also be done as per the law, rules, procedure and on his turn.
- G. Para-G is incorrect the same has already been explained in preceding paras.
- H. Para-H pertains to record and subject to proof.

PRAYER:

It is therefore humbly prayed that on acceptance of the comments, the instant Appeal of the Appellant may very graciously be dismissed with cost.



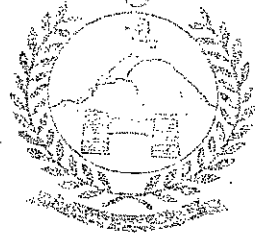
Secretary Health, Khyber Pakhtunkhwa.
Respondent No. 01



Director General Health Services,
Khyber Pakhtunkhwa.
Respondent No. 02
DD (Par)

**DIRECTORATE GENERAL HEALTH SERVICES,
KHYBER PAKHTUNKHWA PESHAWAR.**

Annex A



All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.
Exchange Ph: 091-9210187 - 196 Fax: 091-9210130 Web: www.healthkp.gov.pk

- To,
1. The DG PHSA Peshawar.
 2. The Director Health Services Merged Districts Peshawar.
 3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
 4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
 5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS ANESTHESIA/ SR. C. TECHNICIANS (ANESTHESIA/ CHIEF CLINICAL TECHNICIANS ANESTHESIA (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Anesthesia (BS-12) / Sr. Clinical Technicians Anesthesia (BS-14) / Chief Clinical Technicians Anesthesia (BS-16) (as per approved Service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.**

No. 9937-10030
IAE-VII

Dated 26/6/2019

Copy forwarded to the:-

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, Health Department Peshawar.

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.**

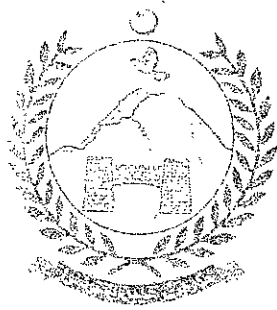
12.	Muhammad Ikramul- loh Anif S/O Fida Hus- sain	6/2/1955	BS-12	12/2/2015 BS (H)	2975 / 5000	59.5	University of Peshawar	DHO Nowshera Jr	Nowshera	12.04.1974	11.09.2034
13.	Syed Muhammad Arif S/O Zainul Abideen Muhammad Ali Shadi S/O Masood ur Reh- man	16/02/1999	BS-12	12/2/2015 BS (H)	2946 / 5000	58.92	University of Peshawar	DHO Charsadda	Charsadda	11/4/1976	10/4/2036
14.	Muhammad Ali Shadi S/O Masood ur Reh- man	27/04/1993	BS-12	12/2/2015 BS (H)	2977 / 5000	58.54	University of Peshawar	KTH Peshawar	Nowshera	13/01/1970	12/1/2030
15.	Novshad Khan S/O Mashooq Jan	12.12.2006	BS-12	12/2/2015 BS (H)	2853 / 5000	57.05	University of Peshawar	AHQ Hosp: Bajour	Bajour	10.04.1982	09.04.2042
16.	Muhammad Ali Shadi S/O Masood ur Reh- man	25.04.1988	BS-12	04-01-2017 BS (H)	3119/5000	62.2	University of Peshawar	QHA/MC Nowshera	Charsadda	20.3.2.1989	19.12.2029
17.	Hayatullah S/O Mu- hammad Ismail	01.01.2010	BS-12	17.03.2017 BS (H)	3.51	87.75	KMU	AHQ Hosp: Bajour	Bajour	01.01.1985	31-12-2024
18.	Iqbal Noor Khan S/O Muhammad Noor Khan	11.08.2007	BS-12	17.02.2017 BS (H)	3.38	3.38	KMU	DHO Hosp: Ba khela	Mainkand	31.03.1983	30.03.2043
19.	Muhammad Arif S/O Saif-ul-Malook	04.01.2005	BS-12	02-8-2017 BS (H)	3122/5000	62.44	University of Peshawar	AHQ Hosp: Panchinar	Kurram	15.03.1973	14-03-2033
20.	Muhammad Akbar Asfandyar Khan S/O Bakht Paider Khar	04.05.1993	BS-12	02-08-2017 BS (H)	2987/5000	59.74	University of Peshawar	W & CH Teach: Hosp: Bannu	Bannu	12.11.1973	11/1/2033
21.	Slinder Shah S/O Bakhtawar Shah	17.03.2012	BS-12	20-02-2018 BS (H)	3.28	3.28	KMU	DHO Dir Lower	Dir Lower	02.10.1982	1/10/2043
22.	Nasrullah S/O Abdul Nawaz	16.09.2003	BS-12	20.02.2018 BS (H)	3.02	3.02	KMU	AS Khyber	Bannu	02.07.1976	1/7/2036
23.	Ayub Saif S/O Pir Saif	30.01.2009	BS-12	30-08-2018 BS (H)	2.96	2.96	KMU	DHO Hosp: Mardan	Mardan	16.01.1983	15-01-2043
24.	Fakhr Alam S/O Samer Gul	1/12/2010	BS-12	30-08-2018 BS (H)	2.80	2.80	KMU	LRH Peshawar	Nowshera	12/4/1988	11/4/2048

Muhammad Jehanzeb Afridi S/O Yaar Mast Khan	22-02-2018	B-12	19-10-2018 BS(H)	2.71	2.71	KMU Peshawar	KAT Mausehra	Peshawar	25-02-1994	24/02/2018
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Prepared by: Syed Anjid Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood Ali Shah J/C cum C.O Bach Ullah C.O Muhammad Anwar J/C & Checked by Sheeraz Khan Deputy Director Pathology DGHS.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Annex-B



**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.**

No. 244-3040 /AE-VII
Dated. 30 /07/2020

To,

1. The DG PHSA Peshawar.
2. All Sub-Offices of Health Services/Tribal Districts in Khyber Pakhtunkhwa.
3. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
4. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.
5. The Director Health Services, Tribal Districts Peshawar.
6. The Medical Superintendent, SGM Hospital, Peshawar.
7. The Medical Superintendent, MASM Hospital GT Road Peshawar.
8. The Medical Superintendent, NKB Memorial Hospital, Kohat Road Peshawar.
9. The Medical Superintendent, Services Hospital, Peshawar.
10. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
11. The Medical Superintendent, General & Mental Hospital Dadar, Manshra.

Subject: PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIAN
(ANESTHESIA) BS-12 OF HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA.

Memo:

Enclosed please find Provisional Seniority List of Clinical Technician (ANESTHESIA) BS-12 of Health Department Khyber Pakhtunkhwa for information and circulation amongst the officials working under your control.

The same may please be brought into the notice of all concerned and objection/observations if any the same may kindly be sent to this Directorate within one month after the issuance of this letter. No representation will be accepted and the Final Seniority List will be considered as correct and will be issued.

Note:- All the Seniority lists are available on official website of Directorate General Health Services Khyber Pakhtunkhwa www.dghskp.gov.pk.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

No. _____ /AE-VII

Copy forwarded to the:-

1. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.
2. President, PMA, Khyber Pakhtunkhwa, Health Department Peshawar.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

231.	Mukhtar Ahmad S/O Humayoun	JCT Anaesthesia B-9 CT Anaesthesia B-12	01.03.2009 11.08.2015	SGT Hosp; Swat	12.01.1980 Swat	11.01.2040
232.	Mukhtiar Ali S/O Abdul Ghawas	JCT Anaesthesia B-9 CT Anaesthesia B-12	12.03.2009 11.08.2015	DHQ Hosp; Dagger Buner	04.03.1984 Buner	03.03.2044
233.	Sidra Bibi D/O Chanzeb	FICT Anesthesia B-9 CT Anaesthesia B-12	20.03.2009 11.08.2015	DHQ Hosp; Haripur	31.10.1983 Mansehra	30.10.2043
234.	Muhammad Iqbal S/O Sher Muhammad	JCT Anaesthesia B-9 CT Anaesthesia B-12	26.03.2009 11.08.2015	DHO Haripur	01.10.1978 Haripur	30.09.2038
235.	Muqadas Majeed S/O Abdul Majeed	JCT Anaesthesia B-9 CT Anaesthesia B-12	26.03.2009 11.08.2015	Maternity Hosp; Peshawar	26.01.1978 Peshawar	25.01.2038
236.	Hamayun Khan S/O Munsif Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	01.04.2009 11.08.2015	DHO Haripur	21.03.1970 Haripur	20.03.2030
237.	Kifayatullah S/O Noor Zamin	JCT Anaesthesia B-9 CT Anaesthesia B-12	01.04.2009 11.08.2015	DHO Dir Upper	20.04.1982 Dir Upper	19.04.2042
238.	Muhammad Israr S/O Muhammad Irshad	JCT Anaesthesia B-9 CT Anaesthesia B-12	01.04.2009 11.08.2015	DHO Dir Lower	20.04.1987 Dir Lower	19.04.2047
239.	Israr Ahmed S/O Saif-ul-Islam	JCT Anaesthesia B-9 CT Anaesthesia B-12	07.04.2009 11.08.2015	DHQ Hosp; Nowshera	02.04.1982 Nowshera	01.04.2042
240.	Sher Muhammad S/O Jab Shah	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.05.2009 11.08.2015	DHO Swabi	02.12.1974/ Swabi	01.12.2034
241.	Syed Abid Akhtar S/O Musa Badshah	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.05.2009 11.08.2015	BKMC Swabi	15.03.1979 Swabi	14.03.2039
242.	Shughla Niaz D/O Rasool Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.05.2009 11.08.2015	DHQ Hosp; Swabi	01-04-1985 Swabi	31-03-2045
243.	Ihsanullah S/O Zalabud Din	JCT Anaesthesia B-9 CT Anaesthesia B-12	03.06.2009 11.08.2015	DHO Mardan	10.03.1978 Mardan	09.03.2038
244.	Syed Bilal Ali S/O Syed Hanif Shah	JCT Anaesthesia B-9 CT Anaesthesia B-12	08.06.2009 11.08.2015	BBST Hosp; Abbottabad	26.03.1986 Abbottabad	26.03.2046
245.	Muhammad Imran S/O Saeed Muhammad	JCT Anaesthesia B-9 CT Anaesthesia B-12	30.06.2009 11.08.2015	DHQ Hosp; Temergara Dir Lower	01.04.1983 Dir Lower	31.03.2043
246.	Zaheer Ahmed S/O Bashir Ahmad	JCT Anaesthesia B-9 CT Anaesthesia B-12	30.06.2009 11.08.2015	DHC Peshawar	01.09.1979 Charsadda	31.08.2039
247.	Muhammad Khan S/O Habib Gul	JCT Anaesthesia B-9 CT Anaesthesia B-12	02.07.2009 11.08.2015	DHQ Hosp; Charsadda	01.11.1975 Charsadda	31.10.2035
248.	Syed Mufahid Shah S/O Syed Mahir Shah	JCT Anaesthesia B-9 CT Anaesthesia B-12	16.11.2009 11.08.2015	NBM Hosp; Peshawar	05.04.1985 Peshawar	04.04.2045
249.	Iqbal Noor S/O Muhammad Noor Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	08.01.2010 11.08.2015	AHQ Hosp; Bajour	01.01.1985 Bajour	31-12-2024
250.	Muhammad Nawaz S/O Noor Gul	JCT Anaesthesia B-9 CT Anaesthesia B-12	08.01.2010 11.08.2015	AHQ Hosp; Bajour	06.02.1982 Bajour	05.02.2042
251.	Aman Ullah S/O Sher Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	22.02.2010 11.08.2015	KGNT Hosp; Bannu	20.09.1978 FR Bannu	19.09.2038
252.	Nasrullah S/O Haji Inayat Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	22.02.2010 11.08.2015	KGNT Hosp; Bannu	01.09.1978 NW Agency	31.08.2038
253.	Rashid Nawaz S/O Rab Nawaz	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.02.2010 11.08.2015	KGNT Hosp; Bannu	13.03.1981 Miranshah	12.03.2041
254.	Inam Ullah S/O Nek Nawaz	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.02.2010 11.08.2015	W&C Hosp; Bannu	01.04.1986/ Mir Ali	31.03.2046
255.	Aziz Ur Rahman S/O Saifur Rahman	JCT Anaesthesia B-9 CT Anaesthesia B-12	24.02.2010 11.08.2015	KTH Peshawar	01-02-1976 Peshawar	31-01-2036
256.	Muhammad Naem Khan S/O Mir Awaz Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	24.02.2010 11.08.2015	DHO Bannu	30.09.1977 Bannu	29.09.2037
257.	Khan Wali Shah S/O Gul Mir Shah	JCT Anaesthesia B-9 CT Anaesthesia B-12	24.02.2010 11.08.2015	DHQ Hosp; Bannu	16.12.1977 Bannu	15.12.2037
258.	Muhammad Ihsan S/O Rab Nawaz	JCT Anaesthesia B-9 CT Anaesthesia B-12	18.03.2010 11.08.2015	MMMT Hosp; Di Khan	28.03.1988 DI Khan	27.03.2048
259.	Sanaullah Khan S/O Awal Gul	JCT Anaesthesia B-9 CT Anaesthesia B-12	26.04.2010 11.08.2015	DHQ Hosp; Karak	01.04.1975 Karak	31.03.2035
260.	Fida Hussain S/O Abdul Khalig	JCT Anaesthesia B-9 CT Anaesthesia B-12	01.05.2010 11.08.2015	DHO Dir Lower	17.04.1983 Dir Lower	16.04.2043
261.	S.Abid Illahi S/O Syedul Arifin	JCT Anaesthesia B-9 CT Anaesthesia B-12	21.08.2010 11.08.2015	MMC Mardan	22.10.1978 Mardan	21.10.2038
262.	Javed Khan S/O Aslam Khan	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.08.2010 11.08.2015	DHO Mardan	02.02.1988 Charsadda	01.02.2048
263.	Muhammad Fayaz S/O Mukhtiar	JCT Anaesthesia B-9 CT Anaesthesia B-12	23.08.2010 11.08.2015	DHO Mardan	03.04.1988 Charsadda	02.04.2048
264.	Azaullah S/O Ghulam Ali	JCT Anaesthesia B-9 CT Anaesthesia B-12	30.11.2010 11.08.2015	KGNT Hosp; Bannu	01.04.1985 FR Bannu	31.03.2045
265.	Muhammad Shafiq S/O Syed Nawaz	JCT Anaesthesia B-9 CT Anaesthesia B-12	01-12-2010 11.08.2015	DHQ Hosp; Lakki	16-07-1986 Lakki	15-07-2046
266.	Fakhr Alam S/O Samar Gul	JCT Anaesthesia B-9 CT Anaesthesia B-12	01-12-2010 11.08.2015	LRH Peshawar	12-04-1988 Peshawar	11-04-2043

601	Sami Ullah Jan S/O Muhammad Jan	CT Anaesthesia B-12	08.07.2019	W&C Hosp; Rajjar Charsadda	10.02.1995 Charsadda	09.02.2055
602	Haris Mahmood S/O Hamid Mahmood	CT Anaesthesia B-12	24.07.2019	DHO Kohat	15.04.1994	14.04.2057

[Signature]
29/07
Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

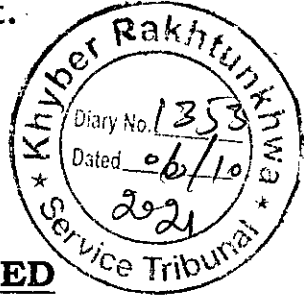
Service Appeal No 4674/2020

DB 1
20/06/22

Iqbal NoorApplicant / Appellant.

Put up to the worthy chair - an **VERSUS**

Govt. & others.....Respondents.



Put up to the worthy chair - an
with relevant app...
6/10/21
D. under

APPLICATION FOR EARLY HEARING OF THE TITLED SERVICE APPEAL.

Respectfully Sheweth;

1. That the above titled service appeal is pending adjudication before this august tribunal, fixed for 20-1-22 in **D.B.**
2. That vide Notification dated 24.08.2021 respondents have promoted the Clinical Technicians (Anesthesia) to the post of Clinical Technologist (BPS-17), hence the appeal needs to be fixed for an early date.
3. That fixing an early date is in interest of justice and there is no hurdle in fixing an early date in the above titled appeal, besides if any early date is not fixed in the titled appeal, the service appeal would lose its purpose and would become infructuous.

Fix in first week of December, 2021
02/12/21
08/12/2021

IT IS THEREFORE, PRAYED, THAT ON ACCEPTANCE OF THIS APPLICATION, THE ABOVE TITLED SERVICE APPEAL MAY KINDLY BE FIXED FOR AN EARLY DATE.

DATED: 05-10-2021

[Signature]
APPLICANT/ APPELLANT

THROUGH,

[Signature]
**FAZAL SHAH MOHMAND
ADVOCATE SUPREME COURT**



AFFIDIVAT

I, **Iqbal Noor**, Anesthesia Technician, District Headquarter Hospital Bajaur at Khar Bajaur District, do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

[Signature]
DEPONENT

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 4674/2020

Iqbal NoorApplicant/Appellant.

VERSUS

Govt. & others.....Respondents.

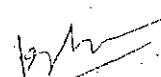
**APPLICATION FOR EARLY HEARING OF THE TITLED
SERVICE APPEAL.**

Respectfully Sheweth:

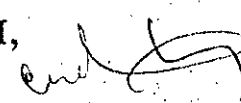
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IT IS THEREFORE, PRAYED, THAT ON ACCEPTANCE OF THIS APPLICATION, THE ABOVE TITLED SERVICE APPEAL MAY KINDLY BE FIXED FOR AN EARLY DATE.

DATED: 05-10-2021


APPLICANT/ APPELLANT

THROUGH,


FAZAL SHAH MOHMAND
ADVOCATE SUPREME COURT

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DEPONENT

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 4674/2020

Iqbal NoorApplicant/Appellant.

VERSUS

Govt. & others.....Respondents.

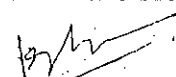
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SERVICE APPEAL.**

Respectfully Sheweth;

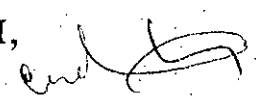
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IT IS THEREFORE, PRAYED, THAT ON ACCEPTANCE OF THIS APPLICATION, THE ABOVE TITLED SERVICE APPEAL MAY KINDLY BE FIXED FOR AN EARLY DATE.

DATED: 05-10-2021


APPLICANT/ APPELLANT

THROUGH,


FAZAL SHAH MOHMAND
ADVOCATE SUPREME COURT

AFFIDIVAT

I, **Iqbal Noor**, Anesthesia Technician, District Headquarter Hospital Bajaur at Khar Bajaur District, do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.


DEPONENT

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 4674/2020

Iqbal Noor.....**Appellant.**

V E R S U S

Govt. & Others.....**Respondents**

REPLICATION ON BEHALF OF THE APPELLANT.

REPLY TO PRELIMINARY OBJECTIONS.

All the objections raised by the respondents are incorrect and as such denied. The appellant has got a valid cause of action and locus standi to bring the present appeal. The appellant has come to this honorable tribunal with clean hands who has brought the titled appeal for his due rights. The titled appeal is maintainable which is according to law and rules on the subject. All necessary parties have been impleaded and this honorable tribunal has got the jurisdiction to entertain and adjudicate upon the matter.

REPLY TO FACTS/GROUNDS:

Comments of the respondents are full of contradictions, rather amounts to admissions and are based on malafide. Respondents have failed to show that the version of the appellant is incorrect. Even respondents have failed to show and substantiate their version referring to any law and rules. In the circumstances the appellant has been deprived of his rights without any omission or commission on his part and he has been deprived of his rights guaranteed by the Constitution and law of the land. The appellant has been subjected to suffer for no fault, as in the seniority list of 2017 his name was present, while he was excluded from the seniority list of 2019 and was told that FATA employees has been declared Separated Cadre(Agency cadre) and

Separated seniority list, but even separate list is not issued till date.

Respondents have tried to twist the facts, by depriving the appellant of his due seniority by making him rolling stone and even excluding him and also not issuing separate list. As actually the issue here is regarding issuance of separated Anesthesia Technician Degree Holders Seniority List for Tribal Merged Districts and allocation of seats for them for promotions to as Anesthesia Technologist BPS-17 while respondents for reasons best known to them have tried to mislead this honorable tribunal. The appellant could not be made to suffer for the fault of others as no one could be punished for the fault of others. In the circumstances the appellant has not been treated according to law and rules being his fundamental right.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

Dated:-12-08-2021.

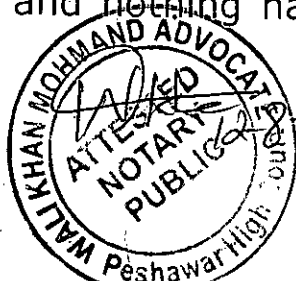

Appellant

Through


FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN

AFFIDAVIT

I, Iqbal Noor, Anesthesia Technician, District Head Quarter Hospital, Bajaur at khar Merged District Bajaur, (the appellant), do hereby solemnly affirm and declare on oath that the contents of this **Replication** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.




DEPONENT