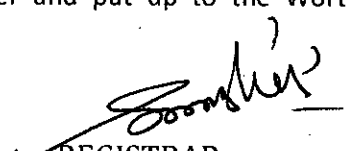

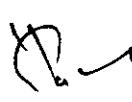


Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1343 /2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/10/2018	<p>The appeal of Dr. Amina Yousaf received today by post may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	17-11-2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28-11-18</u>.</p> <p> CHAIRMAN</p>
	28.11.2018	<p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 15.01.2019 before S.B.</p> <p> Member</p>

15.1.2019

Nemo for appellant.

It is already 12.55 P.M and the case has been called several times. No one is present on behalf of the appellant.

Instant appeal is dismissed for non-prosecution.
File be consigned to record room.



Chairman

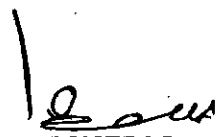
ANNOUNCED
15.01.2019

The appeal of Dr. Aamina Yousaf DHQ Hospital Battagram received today by post i.e. on 09.10.2018 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

- 1- Address of respondent no. 5 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- The law under which appeal is filed is not mentioned.
- 3- Copy of written statement Annexure-2 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 4- Copy of charge assumption report and enquiry report mentioned in para-8 & 9 of the memo of appeal are not attached with the appeal which may be placed on it.
- 5- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 6- Annexures of the appeal may be flagged.
- 7- Annexures of the appeal may be attested.
- 8- Page No. 22, 30 and 38 of the appeal are illegible which may be replaced by legible/better one.
- 9- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 2090 /S.T,

Dt. 12-10 /2018.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Dr. Aamina Yousaf Appellant.

0334-9165002


24/10/18

IN THE PROVINCIAL SERVICE TRIBUNAL PESHAWAR

Appeal no 1343/2018

**INDEX OF DOCUMENTS MENTIONED IN THE MAIN
PETITION**

S.No	Description	Dates	Annexure	Page No.
1.	Petition	24-10-2018	-	1-4
2.	Impugned order	14-06-2018	P-1	5-6
3.	PSC recommendation for appointment	15-09-2017	p-2	7
4.	Posting order at DHQ Battagram	27-09-2017	p-3	8
5.	Posting order of Dr.Sobia Riaz	24-03-2018	p-4	9
6.	Posting of Dai	11-04-2018	p-5	10
7.	FIR / Police Statement	13-06-2018	p-6-8	11-14
8.	Telephonic Record	13-06-2018	p-9	15
9.	Departmental Appeal	20-06-2018	p-10	16-39
10.	Written statement	16-07-2018	p-11	40-55
11.	Reporting at Peshawar	25-06-2018	p-12	56
12.	Notification regarding inquiry	25-06-2018	p-13	57
13.	Fixation of inquiry date	16-07-2018	p-14	58
14.	Appreciation letter of unit incharge	10-11-2017	p-15	59

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21/10/18

IN THE PROVINCIAL SERVICE TRIBUNAL PESHAWAR

Appeal no 1342/2018

INDEX OF DOCUMENTS MENTIONED IN THE DEPARTMENTAL
APPEAL(ANNEXURE P-10 PAGES 16-39

S.No	Description	Dates	Annexure	Page No.
1.	Department Appeal	25-06-2018	Annex-P-10	16-39
2.	Impugned Order	14-06-2018	A to the Appeal	23-24
3.	Appointment Letter	15-09-2017	B to the Appeal	25
4.	1 st Explanation	11-10-2017	C to the Appeal	26
6.	Reply of 1 st Explanation	13-10-2017	D to the Appeal	27
7.	1 st Warning	16-10-2017	E to the Appeal	28
8.	Allotment of residence	10-10-2017	F to the Appeal	29
9.	Clarification of Incharge Gynea & Obs Unit	16-10-2017	G to the Appeal	30
10.	2 nd Explanation	17-10-2017	H to the Appeal	31
11.	Minutes of the Meeting	11-10-2017	I to the Appeal	32-33
12.	Reply to the 2 nd Explanation	21-10-2017	J to the Appeal	34
13.	Memo	08-03-2018	K to the Appeal	35
14.	Reply to the Memo	12-03-2018	L to the Appeal	36
15.	DC Letter	14-06-2018	M to the Appeal	37
16.	FIR	13-06-2018	N to the Appeal	38-39

24/10/18

To,

The Registrar,
Provincial Service Tribunal, old Judicial Complex,
Opposite Pearl continental Hotel,
PESHAWAR.

Registered AD

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1563

Dated 25/10/2018

Respected Sir,

Please refer to memo no.2020 ST dated 12-10-2018 (copy enclosed). The objections raised are removed in the recast petition as under.

1. The address of the respondent no.5 who is now on maternity leave has been completed. Notice may be served on her through her husband Dr. Muhammad Riaz Medical Officer DHQ Hospital Battagram.

2. The Appeal –is being filed under section 4 of KPK Service Tribunal Act.1974

3. Written statement before the inquiry office is attached as per Annexure P-11.

4. As mentioned in Para 8 of the appeal, I reported for duty on 25-06-2018 (P-12) and met Secretary Health Department. I was not given posting order due to ban imposed by the Election Commission as informed by the Secretary Health Department. Hence no charge assumption report. The inquiry was conducted on 16-07-2018 as per enclosure at P-14, I am not aware whether the inquiry report has been submitted or otherwise. Since statutory period of ninety days has elapsed from the date of submission of departmental appeal against the impugned order, the august Tribunal is being approached for remedy.

5. Annexure to the main petition are renamed as P-1 to P 15. For further facilitation the Annexures to the departmental appeal (p-10) are named as annexure (A to N). Likewise the Annexures to the written statement (p-II) are named as enclosures I to X.

6. Annexures have been flagged.


7. All annexures have been attested.

8. Ex page no.22 has been replaced and now it is placed at page no.37. Likewise Ex page 30 has been replaced and now it is at page no.45. Better copy of Ex page 38 has been added at page no.54.

9. Seven more copies / Sets of the appeal with annexures are attached.

Dated 24/10/2018

Yours Obediently,


Dr. Amna Yousaf,
House no 243, street 84,
G11/3, Islamabad.

24/10/18

IN THE PROVINCIAL SERVICE TRIBUNAL PESHAWAR

Appeal no 1343/2018

INDEX OF DOCUMENTS MENTIONED IN THE WRITTEN STATEMENT (ANNEX P-11 PAGES 40-55)

S.No	Description			
1.	1. Written Statement	17-07-2018	p-11	40-55
	2. Posting Order of Appellant	27-09-2017	Encl-I to the written statement	45
	3. Posting Order of Dr. Sobia	24-03-2018	Encl-II to the written statement	46
	4. Posting of Dai	11-04-2018	Encl-III to the written statement	47
	5. Appreciation Letter	10-11-2017	Encl-IV to the written statement	48
	6. Postmortem of Male Dead body	13-06-2018	Encl-V to the written statement	49
	7. Asstt Commissioner & DSP Statements	13-06-2018	Encl-VI-VII to the written statement	50-51
	8. Telephonic Record	13-06-2018	Encl-VIII to the written statement	52
	9. Display at Notice Board with better copy	19-06-2018	Encl-IX to the written statement	53-54
	10. Stoppage of Pay	-	Encl-x to the written statement	55

[Handwritten signature]
24/10/18

IN THE PROVINCIAL SERVICE TRIBUNAL PESHAWAR.

Appeal No. 1343/2018

1 Dr. Aamina Yousaf
(a) District HQ Hospital Battagram
(b) r/o House No-243 Street No.84
Sector G-11/3, Islamabad Appellant

Versus

1 The Secretary Health Department KPK Peshawar
2 Medical Superintendent DHQ Hospital Battagram
3 D.G Health Services Peshawar
4 Dr. Muhammad Rahim
Medical Officer, DHQ Hospital Battagram
5 Dr. Sobia Riaz, Medical Officer (On maternity leave) DHQ Battagram through Dr.
Muhammad Riaz Medical Officer DHQ Hospital Battagram
Hospital
Respondents

Subject: Against impugned order dated 14.06.2018 (Annex P-I& Page-5) departmental appeal dated 20.06.2018 (annex P-10 & Pages 16-39) was filed. Enquiry was conducted on 16.07.2018 (Annex P-4& page-58), Till date final outcome of the departmental appeal dated 20.06.2018 is not known. Hence this appeal before august tribunal under section 4 of the KPK service tribunal act, 1974

Respectively Sheweth,

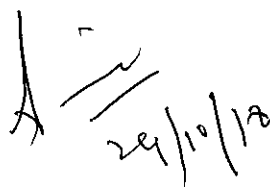
- 1 The appellant was appointed as WMO on the recommendation of KPK Public Service Commission (**Annex- P-2 & Page 7**) and assumed the charge of DHQ Battagram on 18-9-2017
- 2 At the time of assuming charge at DHQ Battagram there was no regular incumbent of the post of M.S and the affairs of DHQ were looked after by Dr. Muhammad Rahim Medical Officer.
- 3 Dr. Muhammad Rahim had established his own private Hospital at stone throw away from DHQ where he had employed doctors and other para medical staff of DHQ as his employees.
- 4 The appellant is first ever local resident WMO posted to DHQ who has completed four years specialized training in Gynea & Obs from Polyclinic Islamabad. Being local resident, Dr. Muhammad Rahim was averse to the appellant posting at DHQ from the day one as in the very posting order of the appellant; the Incharge of Gynea & Obs was prohibited for opening new OPD (**Annex P-3 & Page-8**). However he did not put this restriction at the time of posting of his sister in Law Dr. Sobia Riaz (**Annex P-4 & Page-9**). Rather an independent room with a DAI was arranged for her which is clear manifestation of nepotism and favoritism (**Annex P-5 & Page-10**).

Re-submitted to Day and filed.

[Signature]
Registrar 23/10/18

[Signature]
24/10/18

- 5 As has been explained above, the policies of Dr. Muhammad Rahim were directed toward promotion of his own private Hospital business and protecting Dr. Sobia Riaz his sister in Law. On 13-06-2018 during the holy month of Ramazan, the appellant was on duty in the evening shift of 2:00 PM to 08:00 PM when four dead bodies (three male and one female) were brought to the Hospital. The appellant was performing her duty at Labour room at third floor. At the time of leaving the Hospital at 08:00 PM, she was not informed about the arrival of female dead body which arrived at 7:45 PM according police statement (**Annex P-6,7&8 & Pages-11to14**)
- 6 From 08:00 PM 08:00 AM,(next day) the duty period of Dr. Sobia had started and she was supposed to be on duty. To save his sister in Law from laborious task of postmortem in Ramazan Dr. Muhammad Rahim contacted the appellant for the first time through Dr. Rafiullah (Telephone No. 92345962005) and again himself (Telephone 92333998953) at 08:44 PM to ~~09:34~~PM respectively (**Annex P-9 & Page-15**). When I told him that Dr. Sobia Riaz may be contacted for postmortem he threatened; "No need to come to Hospital tomorrow and report at Peshawar" Next day the appellant was handed over the impugned order.
- 7 On 20-06-2018 after Eid holidays the appellant submitted a departmental appeal (**Annex P-10 & Page 16-39**) through proper channel, the same was returned vide remarks at page 7 of the same appeal for presentation direct to Secretary. The said departmental appeal (**Annex P-10 & Pages 16-39**) and written statement (**Annex P-11 & Pages 40-55**) before the inquiry officer may be read as integral part of this appeal,
- 8 On 25-06-2018 the appellant reported for duty at Peshawar (**Annex P-12 & Page-56**) and requested Secretary Health for cancellation of relieving order and posting back to DHQ Battagram. He informed the appellant that he is not competent to transfer her in view of ban imposed by the Election Commission. He constituted fact finding inquiry vide notification at 25-06-2018 (**Annex P-13 & Page-57**) and did not post the appellant against any post on the plea of ban imposed by Election Commission of Pakistan.
- 9 The inquiry was conducted on 16-07-2018 (**Annex P-14 & Page-58**) and a written statement (**Annex P-11 & Page 40-55**) was handed over to the inquiry Officer, The appellant has not been informed about its final outcome despite several reminders. Hence this appeal before the August Tribunal.
- 10 The credit for introducing of stay duty for WMO in DHQ goes to the appellant. This step of the appellant was appreciated by the Unit Incharge (**Annex P-15 & Page-59**) but the same was an eye sore for Dr. Muhammad Rahim as it adversely affected his private Hospital business. Moreover he did not like our demand for ultra sound machine for the same very reason which had been made dysfunctional.


29/10/18

• GROUND

- A. Dr. Muhammad Rahim was himself Medical Officer. He was not appointed to the post of M.S by the competent authority on acting charge / current charge basis. He was not authorized to issue the impugned order at his own level.
- B. Before issuance of impugned order, prior approval of the competent authority was necessary which had not been obtained.
- C. The impugned order is colourful exercise of authority as Dr. Muhammad Rahim is neither member of management cadre nor was appointed by the competent authority to exercise the powers of M.S
- D. The impugned order has been issued in indecent haste and without affording opportunity to the appellant to explain her position.
- E. The impugned order has been issued with malafide intention to absolve his sister in Law from disciplinary action on one hand and on the other to get rid of the appellant thereby protecting his private Hospital business.
- F. The impugned order was issued at a time when the Election Commission had imposed ban on transfers. Thus the transfer is illegal on this count as well.
- G. Recently when Dr. Muhammad Rahim was posted to PAED section, he got his posting cancelled next day. He is so well connected that he has no respect for rules and regulation and manages things at his sweet will. Managing private Hospital business within prohibited limit.

- (b) attending MPH classes at Peshawar,
- (c) conducting foreign trips without permission,
- (d) saving his sister in law from conducting laborious task of postmortem and forcing other WMO to perform the same and
- (e) allowing C section of female patients by male doctors and restricting female doctors from the same.

are few examples of dare and flagrant violations, If thorough investigation and audit during which he exercised the powers of M.S is carried out, certain startling revelations will come to light

- H. He has exercised the powers of relieving of the appellant in abuse of his official position and beyond the powers vested in him as looking after the responsibilities on stop gap arrangements basis, he was not competent to take such a drastic action without affording an opportunity to explain her position.


A
24/10/13

PRAYERS

- 4 -

- i. The impugned order may be declared null and void ab initio and the appellant be paid full salary from June 2018 onward.
- ii. The impugned order has exposed the appellant to opprobrium and has put social stigma on her reputation .Appropriate order for the redemption of the same may please be issued.
- iii. Departmental action may be initiated against Dr. Muhammad Rahim for ' Misconduct' as defined in the Rules and on account of ' conflict' of interest stricture may be passed against him in the instant proceedings
- iv. Departmental action against Dr. Sobia Riaz may be initiated for her failure to perform the duty.
- v. The appellant be allowed to file defamation suit against Dr. Muhammad Rahim and others.


Appellant


(DR. AMINA YOUSAF)
WMO
DHQ, Battagram

Dated: 24th October 2018.

I Dr. Amina Yousaf solemnly affirm that the position stated in the aforementioned petition is correct to the best of my knowledge and belief and nothing there to has been concealed

Deponent


Dr. Amina Yousaf

Dated : 24th October 2018.

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address;
Casualty Dept Phone No, 0997-310018 Fax No,

dhqbtg518@yahoo.com
0997-311518

No, 1869-79 /Doctor dated 14.06.2018

To,

The Secretary Health Government of
Khyber Pakhtunkhwa Peshawar.

Subject:

RELEIVING OF DR. AMINA YOUSIF WMO BS-17 FROM DUTIES ON
ADMINISTRATIVE GROUND.

Respected sir,

It is submitted that Dr. Amina Yousif WMO BS-17 since her arrival refuse from duty every now & then at a time when she is supposed to perform her duty as per duty roster. The said doctor was given written warning vide this office letter No. 3945-47/warning dated 16.10.2017 (copy attached) & letter No. 4267-69/Warning dated 03.11.2017 (copy attached).

Yesterday an unfortunate event took place at Battagram as a result of which four dead bodies were brought to DHQ Hospital Battagram for post mortem in evening at about 07:45 PM as per emergency record. As per duty roster Dr. Muhammad Ismail CMO BS-20 conducted Autopsy examination of three male dead bodies whereas Dr. Amina Yousif WMO BS-17 who was supposed to conduct post mortem of the deceased & perform her duty in Labor Room from 02:00PM to 08:00PM but she left her duty place at about 07:10PM without prior permission from competent authority & she straight away refused from conducting Autopsy examination of Mst. Zaitoon Bibi.

As a result mob of about 300 people got aggressive & law & order situation was compromised due to irresponsible, non professional & unethical attitude of Dr. Amina Yousaf WMO.

District Administration Battagram, DPO & DSF Battagram had to intervene to control law & order situation, after controlling the mob Dr. Amina Yousif WMO was telephonically contacted both by DMS Dr. Rafiullah the undersigned & she was directed to come & conduct the Autopsy examination but she yet again refused from performing post mortem of the deceased. Deputy Commissioner Battagram has requested for discipline proceedings against Dr. Amina Yousif WMO vide letter No. 1433/PS dated 14.06.2018 (copy attached).

Attested
[Signature]

ALTAF KHAN

Assistant Director

Directorate General Immigration & Passports (HQ)
Islamabad

Assistant Commissioner Battagram Mr. Zakir Hussain & DSP Battagram Mr. Jahir Iqbal has also given written against Dr. Amina WMO (copy attached).

It is further submitted that Dr. Amina Yousif is a non willing worker and least interested in performance Governmental duty.

Every now & then she refuses from government duty & her irresponsible, non professional & unethical attitude can lead to any untoward incidence in DHQ Hospital Battagram which is a security threat for whole staff of DHQ Hospital Battagram & government property.

In wake of the above fact she is hereby relived from DHQ Hospital Battagram & is directed to report to your good self for initiation of disciplinary action under ordinance 2011 & further posting any where in KPK please.

**Medical Superintendent
DHQ Hospital Battagram**

No & date even above:-

Copy forwarded to the:-

- 1- Chief Secretary Khyber Pakhtunkhwa Peshawar for information.
- 2- Director General Health Services Khyber Pakhtunkhwa Peshawar for information.
- 3- Deputy Commissioner Battagram with reference to his letter No. 1433/PS dated 14.06.2018 for information.
- 4- District Police Officer Battagram for information.
- 5- DMS DHQ Hospital Battagram for information.
- 6- Divisional Monitoring Officer Hazara-II Division Mansehra for information please.
- 7- District Account Officer Battagram for information.
- 8- Incharge Gynae Unit DHQ Hospital Battagram for information.
- 9- Dr. Amina Yousaf WMO BS-17 for information. She is directed to report to the office of Secretary Health Khyber Pakhtunkhwa Peshawar.
- 10- Account branch of this office to stop the pay of concerned doctor from Account Office Battagram.

**Medical Superintendent
DHQ Hospital Battagram**

Attested
ALTAJ KHAN
 Assistant Director
 Directorate General Immigration & Passports (HI)
 Islamabad

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 15th September, 2017



NOTIFICATION

NO. SOE/H-1/3-18/2017. On their 1st appointment as Medical Officer/Woman Medical Officer BS-17, the following doctors are hereby posted against the post as mentioned against each with immediate effect in the public interest

S./#	Name with father name	Place of posting
1.	Dr. Mehak Gul D/O Gul Muhammad W/M/O BS-17	DHO Hospital Abbottabad
2.	Dr. Maria Rafiq D/O Muhammad Rafiq W/M/O BS-17	At the disposal of DHO Hanpur
3.	Dr. Abdul Bari S/O Sheron Khan, M/O BS-17	At the disposal of SKMC Swabi
4.	Dr. Abdul Wais Khan S/O Sardar Zaman, M/O BS-17	At the disposal of DHO Bannu
5.	Dr. Adam Khan S/O Shoukat Hussain M/O BS-17	DHO Hospital Kohat
6.	Dr. Adil Ramzan S/O Muhammad Ramzan, M/O BS-17	At the disposal of DHO Abbottabad
7.	Dr. Adnan Tahir S/O Muhammad Tahir Akhtar M/O BS-17	At the disposal of DHO Hanpur
8.	Dr. Ahmad Ali Khan S/O Jahangir Khan	At the disposal of DHO Abbottabad
9.	Dr. Ahmad Zeb S/O Muhammad Alam Zeb	At the disposal of DHO Charsadda
10.	Dr. Aimen Amir D/O Amir Jan Khan	DHO Hospital Nowshera
11.	Dr. Aisha Gul D/O Mian Muhammad Ayub	DHO Hospital Charsadda
12.	Dr. Alam Zeb S/O Bahadur Said	DHO Hospital Dir Upper
13.	Dr. Alamgir Khan S/O Fazil Rehman	At the disposal of DHO Dir Upper
14.	Dr. Alamgir Khan S/O Gul Nader Khan	At the disposal of DHO Dir Upper
15.	Dr. Armina Yousaf D/O Syed Yousaf Shah	DHO Hospital Balingram
16.	Dr. Anjeela Badsah D/O Shahin Shah	DHO Hospital Bakhela
17.	Dr. Aqila Mazhar D/O Mazhar	At the disposal of DHO Malakand
18.	Dr. Asadullah S/O Mishaal ul Islam	DHO Hospital Nowshera

Govt. of Khyber Pakhtunkhwa
Health Department
Peshawar

Assistant Director
Immigration & Passports (HO)
Islamabad
ALTAFF KHAN

P-2



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No: 0997-311518

Email Address:

dhqbc518@yahoo.com

Casualty Dept Phone No: 0997-310018

Fax No:

0997-311518

No. 3660-62 / Office Order dated 27/09/2017

OFFICE ORDER

Consequent upon the arrival of Dr. Amina Yousif, Women Medical Officer, BS-17, her services are given at the disposal of Incharge Gynae Unit with immediate effect. Incharge Gynae Unit is directed not to start any new independent OPD of WMOs. She is further directed to prepare a new duty roster of all WMOs for smooth running of the Gynae Unit. All WMOs should be given equal rotation in OPD, Labor Room & MLC cases.

Sd/- x-x

Medical Superintendent
DHQ Hospital Battagram

No. & date even above.

Copy forwarded to the:-

- 1- Incharge Gynae Unit for information.
- 2- Dr. Amina Yousif WMO, for information.
- 3- All the doctors of Gynae Unit for information.

Medical Superintendent
DHQ Hospital Battagram

Attested
ALTAP KHAN
Assistant Director
Directorate General Immigration & Passports (HO)
Islamabad



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address; dhqbtg518@yahoo.com
Casualty Dept Phone No, 0997-310018 Fax No, 0997-311518

No, 3870-71 /Exp dated 11.10.2017.


To

Dr. Amina Yousif, WMO
DHQ Hospital Battagram.

Subject; EXPLANATION.

According to the duty roster prepared by your unit Incharge you were supposed to be on duty from 11th October 2017 to 20th October 2017. All the WMOs signed the duty roster except you.

This act is against the rules. You are hereby called upon to explain your position as to why strict disciplinary action should not be initiated against you under E & D rules 2011. Your reply should reach this office within three days from the issuance of this letter.


Medical Superintendent
DHQ hospital Battagram
No & Date even above.

Copy forwarded to:-

I- Incharge Gynaec Unit for information.

Medical Superintendent
DHQ hospital Battagram


ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports (HQ)
Islamabad

10-10-10 P-5

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address;
Casualty Dept Phone No, 0997-310018 Fax No,

dhqbtg518@yahoo.com
0997-311518

No, 1107-09 / Office Order dated, 11.04.2018



OFFICE ORDER.

Mrs. Niaz Bibi Dai is hereby directed to perform her duty in Gynae OPD with Dr. Sobia Bibi WMO, with immediate effect in the best of public interest.

d x x x

Medical Superintendent
DHQ Hospital Battagram

No & date even above:-

Copy forwarded to the:-

- 1- Incharge Gynae unit for information.
- 2- Supervisor Class IV staff for information.
- 3- Concerned staff for information.

[Handwritten signature]

Medical Superintendent
DHQ Hospital Battagram

[Handwritten signature]
ALTAZ KHAN
Assistant Director
Directorate General Immigration & Passports (HQ)
Islamabad

جانشین

کلیت 112

پیشکش

دفت 13/78 دقت 13/78

13/78 دقت 19/45 دقت 13/78 دقت 20/45

سید عیاض وارہ سزاوار سے منسوب کی گئی ہے اور اس کی سزا وارہ سزاوار کے پاس
دبیر دفتر 302/324/1152/1148/1149

فائدہ مند ہونے کی صورت میں اس کی سزا وارہ سزاوار کے پاس منسوب کی جائے گی۔

پیشکش کی مدت 13/78

پیشکش کی مدت 13/78

Attested
S. AZAM KHAN
Assistant Director
Immigration & Passports
Islamabad

دقت 13/78 دقت 19/45 دقت 13/78 دقت 20/45

1145 شمارہ کی تاریخ 13/78 دقت 19/45 دقت 13/78 دقت 20/45
دقت 13/78 دقت 19/45 دقت 13/78 دقت 20/45

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دقت 13/78 دقت 19/45 دقت 13/78 دقت 20/45

دقت 13/78 دقت 19/45 دقت 13/78 دقت 20/45

12

میں نے ایسی کئی چیزیں دریافت کیں جن سے ظاہر ہوا ہے کہ ایسی شخصیات جو
 اور مذکورہ شخص کی خدمتوں کو دیکھ کر ان کی آمد کو مسترد کر دیا گیا ہے اور وہ
 میں نے ایسی ہی ایسی چیزیں دریافت کیں جن سے ظاہر ہوا ہے کہ ایسی شخصیات جو
 عملی طور پر ان کی آمد کو مسترد کر دیا گیا ہے اور وہ
 اس کے علاوہ یہ بھی دریافت کیا گیا ہے کہ ایسی شخصیات جو
 جو اس کے علاوہ یہ بھی دریافت کیا گیا ہے کہ ایسی شخصیات جو
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 جن سے ظاہر ہوا ہے کہ ایسی شخصیات جو

13-6-2014
 AMH/PS-CH/2014/13-6-2014

Attested
ALTAF KHAN
 Assistant Director
 Directorate General Immigration & Passports
 Islamabad

دستور العمل کے تحت DMD کے لئے ایک کمرہ
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Attested
 ALTAFF KHAN
 Assistant Director
 Directorate General Administration & Postings (HGI)
 Islamabad

① Director A-1
 ② Director A-2

Office establishment
 to relieve Dr. Amna
 on administrative grounds.

14/06/2018

Received
 RA
 14/06/2018
 Mr. BHO, Head
 Rastrop

ALTA

Directorate General

Immigration & Passports

Isfahan

13/6/78

[Handwritten text in Persian, heavily mirrored and illegible due to bleed-through from the reverse side of the page. Some faint words like "مستقر" (Mastagh) and "تعمیر" (Tameer) are visible.]

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Dr. R
Dr. R

Attested
ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports (MOR)
Kuala Lumpur

Through proper channel

To

The Secretary Health

Govt of KPK

Peshawar

Sub: Appeal against the order no. 1869-79 Doctor dt 14/06/2018 DHQ regarding relieving of Dr.Amina Yousaf WMO B-17

Respected Sir

This is in continuation of the above letter addressed to your goodself (**Annexure-A**) wherein I have been charged for refusing autopsy of female dead body. Before commenting on this point I deem it proper to give chronological background of the events as under:

- 1) The acting M.S Muhammad Rahim is a local resident. He has established his private hospital under the name of 'Rahim General Hospital' at stone's throw from DHQ Battagram. He is also the administrator of the said hospital and is also filling in the shoes of M.S DHQ Battagram.
- 2) He has employed doctors and staff of DHQ in his private hospital.
- 3) Unfortunately when I joined duties at DHQ Battagram on 18-9-2017 Mr. Muhammad Rahim was looking after the duties of M.S since the transfer of regular M.S.
- 4) I was selected as WMO on the recommendation of KPK public service commission and posted to DHQ Battagram vide serial no.15 of Health Department notification no. SO(E)H-11/3-18/2017 dated 15/09/2017 (**Annexure-B**) On account of male chauvinism coupled with being first ever local WMO posted to DHQ Battagram he considers my appointment in DHQ as potential threat to his hospital business despite the fact that having completed FCPS-I training at polyclinic Islamabad I was not doing private practice. It was due to this apprehension that he issued written direction to HOD Gyane department that no third OPD be opened for me and my sister DR: Saeeda Yousaf.
- 5) Ultra Sound Machine is considered sine qua non for the patients of gynae&obse. Having got some know-how of the facility, we opted for the service either on rotational basis or regular basis as the ultrasound

Attested
ALTAF KHAN
 Assistant Director
 Directorate General Immigration & Passports (MO)
 Islamabad

KHAN
 Assistant Director
 Immigration & Passports
 Islamabad

17 pages
 20/6/18



machine was rusting in the store and was never made functional as its use in DHQ was detrimental to private practice.

- 6) The acting M.S in a planned manner included my cell number (0334 9165002) in whatsapp group of doctors without my consent wherein usually feelers were hurled out regarding Gyne&Obs Department in order to embarrass and harass female doctors. I therefore opted out from this group after some time realizing his ill intentions.
- 7) Vide memo no. 3870-71 Exp dated 11-10-2017 (**Annexure-C**) I was asked as to why I have not signed duty roster. A simple reply dated 13/10/2017 (**Annexure-D**) was given to it but the same was not found satisfactory on the plea that no complaint or reservations about the duty roster was received by him or DMS till 1:30 p.m. on 11/10/2017 and accordingly warning no.3945-17 dated 16-10-2017(**Annexure-E**) in complete disregard to the following text message on my mobile at 2:56 p.m. on 11/10/2017 and the position being explained in para 8 below.
 "Aoa madam its me Dr.Rahim, plz save my number. We all will wait till Monday then we sort out solution. Dr. Marlam and Dr. Bushra will give cover till Monday, tomorrow will sort out for 13 of dis month."
- 8) Contrary to his plea that no complaint or reservation has been received by him till 11/10/2017, I had explained my reservations in writing vide application dt 10/10/17 (**Annexure-F**). In order to grill me in his ill design he kept this application with him and recorded the following note on its top on 16/10/2017 "No vacant bungalow is available right now as already Dr.Beenish, Gynecologist, and Dr. Bushra, WMO, are performing duties without accomodation as house rent is already given by Govt of KP. Room in family hostel may be provided if needed."
- 9) Despite my reservations and difficulties I performed duty on 13/10/17 and thereafter the system of stay duty was set in motion which is being followed uptill now by me and my sister DR:Saeeda Yousaf to the exclusion of remaining female doctors who only perform "call duty". This provided solace to the poor patient with too much chagrin to Mohammad Rahim, the acting M.S as it has adversely effected his private hospital business.
- 10) It is a universal fact that out of total seven lady doctors only 2 (i.e. Dr. Amina Yousaf and Dr. Saeeda Yousaf) have been performing stay duty at evening and night. The remaining five doctors are performing 'call duty' on rotational basis. The acting M.S has no objection to this

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20/6/18

Ahmed
AJAF KHAN
Assistant Director
Directorate General Immigration & Passports (HQ)
Islamabad

2

arrangement while our stay duty is an eye sore for him for obvious reasons as explained in preceding para. It goes to my credit that the system of 'stay duty' was introduced at my initiative for the first time in the history of District Battagram.

- 11) In complete disregard to the position explained at para (8) &(9) above, the acting M.S issued warning bearing no. 3945 -47 warning dated 16/10/2017 (**Annexure-E**) ignoring the explanatory note of unit incharge of Gyne and Obs(**Annexure-G**).
- 12) Vide memo no. 4005-07 dt 17/10/2017 the acting M.S issued explanation on flimsy grounds (**Annexure-H**). He circulated distorted facts contained in the minutes(**Annexure-I**)of in house meeting to the outside authorities. The position was rebutted vide my reply dt 21/10/2017 (**Annexure-J**) and explanatory note of incharge Gyne and Obs(**Annexure-G**).
- 13) As regard warning no. 4267-69 warning dt 3/11/2017 the same has not been received by me earlier nor enclosed with present letter under discussion. Hence it is not possible for me to submit comments in this regard.

II) The following position emerges from the above discussions:

- 1) The acting M.S is double gamer as through text messages above he assures sorting out solution , while on the same count issues warning on the same matter.
- 2) The acting M.S is **spin doctor** in view of his abilities of circumventing the situation and presenting distorted facts. In the minutes of in house meeting he presented distorted facts as explained in my rejoinder(**Annexure-J**) and unnecessarily circulated the same to the outside authorities in order to malign my reputation which amounts to washing dirty linen in public. Actually he is fond of building a false image of good administration over the skulls and reputation of innocent colleagues.
- 3) Acting as M.S and simultaneously as administrator of private hospital aren't compatible positions,thus he is betraying the trust of public interest.
- 4) Keeping in view the above traits of his personality and the allegation contained in paras III-V below,I must say to spin doctor '**O physician heal thyself first**'.

Attested
ALTAZ KHAN
Assistant Director
Directorate General Immigration & Passports (M)F
F-11, Islamabad

III) With regard to conducting autopsy on 13/06/2018 the position is explained as under.

- a) According to duty roster Dr. Sobia Riaz w/o Dr. Riaz and sister in law of acting M.S was supposed to be on night duty from 8 p.m. onward. Had she been present at place of duty the alleged law and order situation would have been averted. But the acting M.S due to sheer favoritism and nepotism was adamant to perform autopsy by Dr. Sobia Riaz.
- b) I admit that I received first calls from DMS at 8:45 p.m. as well as that of acting M.S at 9:40 p.m. (cell numbers 03459620055 & 0339198953 respectively). I told them that DR: Sobia who is supposed to be on duty after 8 p.m. may be asked to do the autopsy. At this the acting M.S threatened "No need to come to hospital tomorrow. Report to D.G at Peshawar".
- c) The acting M.S. very meticulously and viciously mentioned my name instead of DR: Sobia before the local authorities, thereby inviting their wrath over me in the form of letter from D.C and written statements of A.C and DSP. Copies of statements of A.C and DSP and letter from D.C have not been supplied to me along with letter under reference. The acting M.S rides on the cusp of hubris on account of his father's position in KPK bureaucratic setup. To him his colleagues are small creature and sons of lessor god having no integrity and self-respect
- d) It is beyond my imagination that Mohammad Rahim the acting M.S will stoop to such a level and exploit the gory incident to settle his personal score with me.

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Atiqul
ALTAHIAN
Assistant Director
Directorate General Immigration & Passports (M)
Islamabad

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IV) a) In general the attitude of acting M.S towards the colleague doctors is contemptuous and in particular intimidating towards the undersigned.

The classic example of this is memo no 715-55 dt 8/03/2018 (Annexure-K) wherein he clubbed the explanation of doctors with those of lower staff upto the level of sweeper in one and same letter. This has derogatory effects on the status of doctor's community. He included my name in the said memo through figment of his own imagination. A copy each of the said memo and its reply dated 12/03/2018 are attached as (Annexures K& L) respectively. No reply has been given to the query raised in para 2 of my said reply.

b) In one of the meetings DR:Muhammad Rahim sarcastically and scornfully labelled the incumbent M.S as "Mamnoon Hussain" with no powers and real authority. He recited Kalima and stated that he is not interested in becoming acting M.S. He vowed not to accept the position if offered to him in future. Despite his solemn affirmation he has accepted the position now during training period of regular incumbent M.S.

c) His attitude towards the undersigned is discriminatory, intimidating abhorrent and disgusting to say the least, with a proclivity of favoritism and nepotism towards his sister in law in as much as on the eve of my appointment in Oct 2017 he prohibited opening of third OPD while on the appointment of his sister in law in March 2018 he managed separate OPD with independent room and Aya.

Moreover he was reluctant in asking his sister in law to conduct autopsy and was insisting me to conduct the same when the duty period of Dr. Sobia had started. What would have been the situation if I were also performing 'call duty' like his sister in law? Is he punishing me for performing regular stay duty at evening and night?

V) In view of foregoing allegation of 'Misconduct' under E&D Rules 1973 r/w Conduct Rules 1987 is made out against acting M.S on the following counts.

- a) The acting M.S is accused of corrupt practices of running private hospital within prohibited limitations of DHQ.
- b) While being government servant he is utilizing passport obtained in private capacity. His passport may be taken into custody for scrutiny.
- c) He has conducted foreign trips without permission.

Attested

ALTAF KHAN
 Assistant Director
 Directorate General Immigration & Passports (HM)
 Islamabad

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- d) He is taking regular classes of MPH at Peshawar and leaves the station without proper permission.
- e) A prohibition has been issued with regard to c/section by WMO while the same has been conducted by male medical officers during his incumbency as M.S although qualifying willing WMOs were available. Thus he has unnecessary infringed the privacy of female patient

VI) Sir the acting M.S is running the affairs of DHQ as his princely fiefdom side by side with his private hospital. The acting M.S is in BPS 17 and is not competent to relieve doctor of equal status without prior approval of competent authority. The Civil Service Act 1973 and Rules made thereunder don't contemplate such a drastic action of relieving and stoppage of pay of a doctor of equivalent status and grade by acting M.S. in such an eventuality he is supposed under the rules to approach D.G Health Service/ Secretary Health for appropriate action. He therefore **owes an explanation** for such a drastic action at his own level as proposed by D.C Battagram in his letter addressed to him (**Annexure-M**). However in order to satiate his thrust of revenge and vendetta for the reasons indicated in proceeding para's he took this unprecedented step in **unholy** haste without the prior approval of competent authority. Since this order has been issued under false color and in excess of lawful authority having no sanctity of Rules behind it, its compliance is being kept in abeyance till lawful direction from honorable Secretary Health Department.

VII) In this tragic episode determination of following points are of outmost and crucial importance

- a) Timely non declaration state of emergency by the hospital administration.
- b) Timely non information and **alert** to the undersigned for not leaving the hospital even after my duty hour due to autopsy of female dead body.

To cover their failures and laxity the hospital administration have offered me as a scapegoat. Whatever may be the timing of arrival of dead bodies, my point of defense is that I had not been informed of female autopsy during my duty hour's upto 8 p.m. According to protocol FIR/ death report and injury report are preconditions for autopsy. In this particular case FIR (**Annexure-N**) it contain 2 pages and the reasonable time for its recording is 30 minutes followed by death report and injury report which further requires 30 minutes. This substantiates my claim that first ever information

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 Pages 21

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ALTAF KHAN
 Assistant Director
 Directorate General Immigration & Passports (HR)
 Islamabad

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are call from the hospital administration at 8:44 P.M.As pointed earlier the DMS Mr. Rafi ullah informed me of the autopsy for the first time at 8:44 p.m. from cell no: 03459620055 when I had already left for home and the duty period of DR: SOBIA the sister in law of acting M.S had started, followed by the telephone of acting M.S at 9:40 p.m. as discussed in para (III-~~B~~) above. **The onus of proving that I had been informed of the autopsy well in time and prior to 8 p.m. therefore lies upon hospital administration.** To get rid of me the acting M.S has taken hasty action prior to determination of actual responsibility through formal inquiry thereby condemning me unheard on one side and on other damaging my integrity and reputation by giving it wide publicity through whatsapp group and Facebook/ social media. I therefore reserve the right for filing libel and defamation suit in court of law.

(k)

VII) In view of above mentioned position the following prayers are made:

- a) An impartial inquiry committee may be constituted to look into the allegations of acting M.S and counter allegations of the undersigned.
- b) Justice and fair play demand that the acting M.S and the appellant may not hold their present positions till finalization of inquiry report. Both of us be either debarred from performing duties or placed under suspension.
- c) The appellant may be accorded protection in accordance with the provisions of KPK Whistleblower and Vigilance Commission Act 2016.
- d) The impugned letter (**Annexure-A**) be declared void abinitio and its compliance not binding on petitioner.

Page 20/6/18
 (27)

Attested
ALTOF KHAN
 Assistant Director
 Directorate General Immigration & Passports (HQ)
 Islamabad

You have been already relieved on administrative grounds on 14/06/2018. You may appeal this office letter # 1869-79 to higher authority directly.
 Village Maidan Tehsil & District

Yours Obediently
 DR: Amina Yousaf

Battagram

Cell no# 0334-9165002

Dated: 20/6/18

No. 1910

dated 23/06/2018

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 23/6/18

23
A
OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address;
Casualty Dept Phone No, 0997-310018 Fax No,

dhqbtg518@yahoo.com
0997-311518

No, 1869-79 /Doctor dated 14.06.2018

To,

The Secretary Health Government of
Khyber Pakhtunkhwa Peshawar.

Subject:

**RELEIVING OF DR. AMINA YOUSIF WMO BS-17 FROM DUTIES ON
ADMINISTRATIVE GROUND.**

Respected sir,

It is submitted that Dr. Amina Yousif WMO BS-17 since her arrival refuse from duty every now & then at a time when she is supposed to perform her duty as per duty roster. The said doctor was given written warning vide this office letter No. 3945-47/warning dated 16.10.2017 (copy attached) & letter No. 4267-69/Warning dated 03.11.2017 (copy attached).

Yesterday an unfortunate event took place at Battagram as a result of which four dead bodies were brought to DHQ Hospital Battagram for post mortem in evening at about 07:45 PM as per emergency record. As per duty roster Dr. Muhammad Ismail CMO BS-20 conducted Autopsy examination of three male dead bodies whereas Dr. Amina Yousif WMO BS-17 who was supposed to conduct post-mortem of the deceased & perform her duty in Labor Room from 02:00PM to 08:00PM but she left her duty place at about 07:10PM without prior permission from competent authority & she straight away refused from conducting Autopsy examination of Mst. Zaitoon Bibi.

As a result mob of about 300 people got aggressive & law & order situation was compromised due to irresponsible, non professional & unethical attitude of Dr. Amina Yousaf WMO.

District Administration Battagram, DPO & DSF Battagram had to intervene to control law & order situation, after controlling the mob Dr. Amina Yousif WMO was telephonically contacted both by DMS Dr. Rafiullah the undersigned & she was directed to come & conduct the Autopsy examination but she yet again refused from performing post mortem of the deceased. Deputy Commissioner Battagram has requested for discipline proceedings against Dr. Amina Yousif WMO vide letter No. 1433/PS dated 14.06.2018 (copy attached).

Attested
SITAF KHAN
Assistant Director
Directorate General Immigration & Passports (H)
Islamabad

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Assistant Commissioner Battagram Mr. Zakir Hussain & DSP Battagram Mr. Tahir Iqbal has also given written against Dr. Amina WMO (copy attached).

It is further submitted that Dr. Amina Yousif is a non willing worker and least interested in performance Governmental duty.

Every now & then she refuses from government duty & her irresponsible, non professional & unethical attitude can lead to any untoward incidence in DHQ Hospital Battagram which is a security threat for whole staff of DHQ Hospital Battagram & government property.

In wake of the above fact she is hereby relived from DHQ Hospital Battagram & is directed to report to your good self for initiation of disciplinary action under ordinance 2011 & further posting any where in KPK please.

**Medical Superintendent
DHQ Hospital Battagram**

No & date even above:-

Copy forwarded to the:-

- 1- Chief Secretary Khyber Pakhtunkhwa Peshawar for information.
- 2- Director General Health Services Khyber Pakhtunkhwa Peshawar for information.
- 3- Deputy Commissioner Battagram with reference to his letter No. 1433/PS dated 14.06.2018 for information.
- 4- District Police Officer Battagram for information.
- 5- DMS DHQ Hospital Battagram for information.
- 6- Divisional Monitoring Officer Hazara-II Division Mansehra for information please.
- 7- District Account Officer Battagram for information.
- 8- Incharge Gynae Unit DHQ Hospital Battagram for information.
- 9- Dr. Amina Yousaf WMO BS-17 for information. She is directed to report to the office of Secretary Health Khyber Pakhtunkhwa Peshawar.
- 10- Account branch of this office to stop the pay of concerned doctor from Account Office Battagram.

**Medical Superintendent
DHQ Hospital Battagram**

Attested
ALTAF KHAN
 Assistant Director
 Directorate General Immigration & Passports (M)
 Islamabad

Dr. Amina Yousif

GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 15th September, 2017



NOTIFICATION

NO. SOE/M/113-18/2017. On their 1st appointment as Medical Officer/Woman Medical Officer BS-17, the following doctors are hereby posted against the post as mentioned against each with immediate effect in the public interest

S.#	Name with father name	Place of posting
1.	Dr. Mehak Gul D/O Gul Muhammad, W/O BS-17	DHO Hospital, Abbottabad
2.	Dr. Mada Razaq D/O Muhammad Razaq, W/O BS-17	At the disposal of DHO Haripur
3.	Dr. Abdul Bari S/O Shereen Khan, MO BS-17	At the disposal of BKMHC Swabi
4.	Dr. Abdul Wazir Khan S/O Sardar Zaman, MO BS-17	At the disposal of DHO Bannu
5.	Dr. Adnan Khan S/O Shoukat Hussain, MO BS-17	DHO Hospital Kohat
6.	Dr. Adil Ramzan S/O Muhammad Ramzan, MO BS-17	At the disposal of DHO Abbottabad
7.	Dr. Adnan Tahir S/O Muhammad Tahir Akhtar, MO BS-17	At the disposal of DHO Haripur
8.	Dr. Ahmed Ali Khan S/O Jahangir Khan	At the disposal of DHO Abbottabad
9.	Dr. Ahmad Zeb S/O Muhammad Alam Zeb	At the disposal of DHO Charsadda
10.	Dr. Almen Amir D/O Amir Jan Khan	DHO Hospital Nowshera
11.	Dr. Alpha Gul D/O Mian Muhammad Ayub	DHO Hospital Charsadda
12.	Dr. Alam Zeb S/O Bahadur Said	DHO Hospital Dir Upper
13.	Dr. Alamgir Khan S/O Fazlur Rehman	At the disposal of DHO Dir Upper
14.	Dr. Alamgir Khan S/O Gul Nadeem Khan	At the disposal of DHO Dir Upper
15.	Dr. Amina Yousaf D/O Syed Yousaf Shah	DHO Hospital Balingram
16.	Dr. Anelia Badshah D/O Shahin Shah	DHO Hospital Bakhala
17.	Dr. Anja Mehtar D/O Mehtar	At the disposal of DHO Malakand
18.	Dr. Asadullah S/O Mishaq ul Islam	DHO Hospital Nowshera

Office of the Assistant Director Health Department

ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports (HQ)
Islamabad

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08

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3

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address;
Casualty Dept Phone No, 0997-310018 Fax No,

dhqbtg518@yahoo.com
0997-311518


No, 3870-71 /Exp dated **11.10.2017.**

To
Dr. Amina Yousif, WMO
DHQ Hospital Battagram.

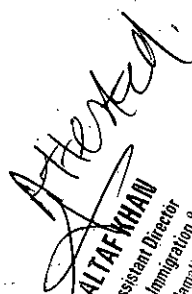
Subject; **EXPLANATION.**

According to the duty roster prepared by your unit Incharge you were supposed to be on duty from 11th October 2017 to 20th October 2017. All the WMOs signed the duty roster except you.

This act is against the rules. You are hereby called upon to explain your position as to why strict disciplinary action should not be initiated against you under E & D rules 2011. Your reply should reach this office within five days from the issuance of this letter.


Medical Superintendent
DHQ Hospital Battagram
& Date even above.

Copy forwarded to:-
I- Incharge Gynae Unit for information.


ALTAY KHAN
Assistant Director
Inspector General Immigration & Passports (HQ)
Battagram

Medical Superintendent
DHQ Hospital Battagram

[Handwritten signature]

Ms DHQ

Battagram

Subject: Explanation

This is with reference to your letter No 8876-71 Exd dated 11-10-2017. in this regard it is submitted that the undersigned has some reservation upon the duty roster prepared by unit incharge as it is impossible for individuals to perform continuous duty of 24 hours upto 10 days (continues 240 hours duty).

Keeping view above, you are therefore requested to may kindly withdraw ^{isfandi} the allegations framed upon me on the above mentioned explanation letter please

Date 13-10-17

Yours obediently

[Handwritten signature]
Dr. Amin Yousaf

NAME
DHQ
Battm

[Handwritten signature]
ALTAF KHAN

Assistant Director
Secretary, General Immigration & Passports (HQ)
Islamabad

283
F

Medical Superintendent,
DHQ Hospital Battagram



MS Office Phone No. 0997-311518
Casualty Dept Phone No. 0997-310018
Fax No. 0997-311518
Email Address; dhqbtg518@yahoo.com
No. 3945-47, warning dated 16.10.2017


To,

Dr. Amina Yousif, WMO
DHQ Hospital Battagram.

Subject: WARNING.

You Dr. Amina Yousif WMO were called upon to explain your position vide this office letter No. 3870-71/Exp dated 11.10.2017 for not signing duty roster signed by all others WMOs & ward Incharge Dr. Ghazala Rasheed. The undersigned is not satisfied from your reply as roster was submitted on 05.10.2017 & the undersigned did not receive any complaint neither from you nor from your Incharge till 01:30PM on 11.10.2017 when your duty had already begun. Although the said roster was for on call duty signed by other WMOs yet if you had any reservation you could have complained in time by informing the undersigned or DMS.

You are hereby given 1st & last warning to be careful in future otherwise strict disciplinary action will be initiated against you under E&D rules 2011, as your this irresponsible act could have caused any untoward incidence in this hospital if the undersigned had not requested Dr. Bushra Fazal Wahab or Dr. Mariam Faiz WMO, for your duty cover in time. You are further directed to obey your unit Incharge & in case of reservation inform the undersigned in time for smooth running of the unit & hospital

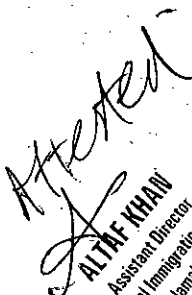

Medical Superintendent,
DHQ Hospital Battagram

No & date even above.

Copy forwarded to the:-

- 1- Incharge Gynae Unit for information.
- 2- Divisional Monitoring Office Hazara Division for information.

Medical Superintendent,
DHQ Hospital Battagram

Attested

ALTHE KHAN
Assistant Director
Directorate General Immigration & Passports HQ
Islamabad

12

Director General Immigration
Assistant Director
ABDUL KHALEK
13

Duty No 30 Date 12-10-17

Date 10-10-17

Kind honour will receive me for this unsepe Jimmy at night
in fedal govt outside the district. It is hoped that you
to commute at night without any escort as my husband is seen
Premises You will appreciate that it is quite unsepe for him to
residential accommodation (house) is provided to me within hospital
I may please be exempted from call duty at night till
Premises to enable me to perform call duty efficiently. Attended
be ~~the~~ allocated residential accommodation within hospital
after performing the normal duty of morning as I have to come
impossible for me to reach hospital in time on call duty at night
hospital Bhatnagar since 18 Sept 2017. It is difficult rather
DHO is stated that I am working as WMO DHO

Application for allotment of Govt Residential
accommodation (house)

Subject

DHO Hospital Bhatnagar
M/S

No 3956
16/10/17

NI NCCM Bangalore is available right now as
already Dr. Gemme Kumbhakar is on duty. As
one of my duties is to provide accommodation, as
mentioned in my letter to you on 10/10/17, as
I am already on duty in the morning, I am
requesting you to provide me with a room
in the family hostel which will be provided
if needed.

Yours obediently
Dr. Amira Yusuf
WMO

- 9 -

To

The m-s Sabis
Dtd 22/2/20

with due regard to his
 statement that the ^{Reply of} ~~letter~~ given
 by Comptroller in charge - the
 statement that Dr Amine Yousef was
 reporting the Evening and Night
 (on call Duty) - please correct
 this statement. Due to Refusal I was
 facing problems from other wings
 & thanks
 Dr. Ghazali
 Comptroller
 in charge Dtd 20/2/20



Attested
 ALTAJ KHAN
 Assistant Director
 Directorate General Immigration & Passports (HQ)

31

H-1



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address;
Casualty Dept Phone No, 0997-310018 Fax No,

dhqbtg518@yahoo.com
0997-311518

No, 4005-07 /Exp dated 17.10.2017.

To

Dr. Amina Yousif WMO,
DHQ Hospital Battagram.

Subject; EXPLANATION.

Whereas you were given a warning vide this office letter No. 3945-47 dated 16.10.2017.

And whereas as per written report of your HOD you refused from evening & night duty &

Whereas you were demanding Ambulance for your transportation & whereas you were not following orders of your Incharge & orders of the undersigned & whereas you misbehaved with your Dai as per written complaint of her (copy attached).

Now therefore you are hereby once again called upon to explain your position with in three days positively with out failure.

**Medical Superintendent
DHQ hospital Battagram**
No & Date even above.

Copy forwarded to:-

- I- Incharge Gynae unit for information.
- II- Divisional Monitoring Officer Hazara Division for information.

**Medical Superintendent
DHQ hospital Battagram**

Attested
ALTAJ KHAN
Assistant Director
Directorate General Immigration & Passports (HQ)
Islamabad

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(3)

MINUTES OF MEETING WITH ALL GYNACOLOGIST & WMOS OF DHO HOSPITAL BATTAGRAM

A meeting was held in the office of the undersigned at 01:30PM, on 11.10.2017 with all the Gynecologist & WMOs to discuss and to formulate various protocols for future.

The meeting was chaired by the Medical Superintendent & the following doctors participated.

- I- Dr. Ghazala Rasheed District Gynecologist/Incharge Gynae Unit.
- II- Dr. Benish Raza District Gynecologist.
- III- Dr. Gul Khan Incharge Casualty Department
- IV- Dr. Marium Faiz WMO
- V- Dr. Amina Yousif WMO

At the very start of the meeting, the MS narrated a few verses from Holy Quran and paid his regards to all the participants. After thorough discussion the following protocols were formulated.

- I- Dr. Ghazala Rasheed will be the over all incharge of Gynae Unit & the final deciding authority of all the matters related to Gynae unit.
- II- The incharge Gynae Unit will prepare a comprehensive and practicable duty roster of various categories of staff. The main & basic target is to keep the Labor Room & operation theater fully functional & open round the clock, so that any type of emergency surgery may be performed with out any delay.
- III- The administration will show zero tolerance on absenteeism. Incharge Gynae Unit will send absent reports of the concerned staff about all the three shifts.
- IV- No irrelevant person will be allowed to enter into the Labor Room.
- V- The working hours for three shifts will be from 08:00 AM to 02:00 PM (Morning), 02:00PM to 08:00PM (Evening) & 08:00PM to 08:00 AM (Night). All the preplanned surgeries will be performed in the morning. Evening and night shift will be open for any emergency case. It will be the Gynecologist to decide whether the case is emergency or otherwise.
- VI- On duty staff of evening and night shifts will physically remain present in the Labor Room.
- VII- Proper handing/taking over will be observed at the time of shift change.
- VIII- OT list will be prepared & sent to the OT on preoperative day by the Gynecologist concerned. Along with OT list the list of medicines required for various patients will be sent to OT staff.
- IX- Without proper preparation no patients will be accepted by the OT staff. Preparation means complete basic laboratory investigations, Rays, fitness for anesthesia, arrangement of blood if needed, arrangement of preoperative drugs, administration of IV cannula and others as per requirements of the surgery.
- X- All the complaints against non willing workers will be submitted by the incharge Gynae Unit in writing. Verbal complaints will never be entertained.
- XI- Incharge Gynae unit was asked about incomplete duty roster submitted by her as Dr. Amina Yousaf WMO, has not signed duty roster. Dr. Amina Yousif WMO when asked, she give reason that she cannot perform night duty due to non availability of residence & transportation from hospital administration.

Attended
BY THE KHAN
Assistant Director
General Incharge DHO & PASHOR
Battagram

undersigned has explained as no banglows is available & already Dr. Bushra Fazal WMO are performing their duties with government residence. All WMOs will be provided a side room along with attach washroom but she refused to stay at night due to lack of banglow & transportation from hospital administration.

- XIII- On the request of all participants the duty roster of unit was changed till 16:10:2017 due to arrival of Dr. Saeeda Yousif WMO BS-17.
- XIV- Incharge Gynae unit was directed to make a new proper duty roster of Gynae unit till 16:10:2017 & make sure physical presence of lady doctor WMO in evening & night shift in side rooms for smooth running of unit & hospital.

The meeting ended with a vote of thanks.


Medical Superintendent
DHQ Hospital Battagram

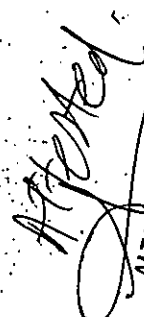
No. 3882-92 / Meeting

Dated 12/10/2017

Copy forwarded to the:-

- 1- PS to Secretary Health Govt of Khyber Pakhtunkhwa Peshawar for information.
- 2- Director General Health Services, Khyber Pakhtunkhwa Peshawar.
- 3- District Nazim Battagram for information.
- 4- Deputy Commissioner Battagram for information.
- 5- Divisional Monitoring Officer Hazara Division for information.
- 6- All the doctors of Gynae Unit & other participants of the meeting.


Medical Superintendent
DHQ Hospital Battagram


ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports HQ
Islamabad

Dr. Amna Yousaf

34

To,

The MS
DHQ Hospital, Battagram

J

Subject: Explanation.

Please refer to memo no. 4005-03 dated 17/10/2017 received on 20/10/2017 as I was on evening and night duty on 17/10/2017 and 18/10/2017 respectively followed by an off duty on 19/10/2017.

2. All the allegations included in the above cited memo are vehemently denied except for an additional allegation of so called misbehavior with Dai which never occurred, the remaining allegations are by-products of the earlier memo dated 11/10/2017. A warning dated 16/10/2017 has been issued to me on this count on the flimsy and frivolous pretext that I have not communicated my reservations about on call duty roster within time. I had communicated my reservations (not refusal) vide my written application dated 10/10/2017 as well as verbally to HoD and your good self well in time. That is why a meeting was called on 11/10/2017 in this regard. There are reasons to believe that my reputation is being maligned in complicity with Monitoring Team and I am being labeled as problematic lady doctor so as to deviate me from my principled stand. I understand that my this explanation like previous one will be found unsatisfactory. However to keep the record straight the position is summarized as under.

(i) As is evident from the written report of Dr. Ghazala Rasheed HoD annexed with explanation memo as well as from her further clarification statement, (copy endorsed) I never refused from "stay duty" in evening and night but had expressed certain reservations (not refusal) including demand for transport facility or residential accommodation within Hospital premises in respect of "call duty" in evening and night as well as proper duty room and security arrangements. Unfortunately your honor did not realize catch 22 position of female lady Doctor coming from a village situated away from Hospital for night duty and help her out. As regard willingness of Dr. Benish Raza Gynecologist and Dr. Bushra Fazal Wahab for on "call duty" in evening and night, both these doctors are non local and have their residences within walking distance of the Hospital. In the meeting held on 11/10/2017 Dr. Mariam was assigned on "call duty" on 11/10/2017 and 12/10/2017, while I was assigned on "call duty" on 13/10/2017 which I have performed without any hesitation. Thus the allegation that I refused on "call duty" is based on mere suppositions / presumptions and apprehensions and is completely devoid of facts. I fail to understand as to how a warning can be issued on facts which have never occurred.

(ii) It is the norm of the official routine and decorum that draft minutes are circulated among participant of the meeting before it is given final touch, the reason being that the view points of the participant are included in the minutes. No such exercise was carried out in respect of minutes of the meeting held on 11/10/2017. Therefore it contained one sided picture and distorted facts in paras XI, XII. These two paras convey the message as if I was demanding some perks and privileges and in the absence of the same have refused to perform duty. As explained earlier I was demanding transport facility or residence within Hospital premises for efficient patient management in emergency situation and true spirit of "call duty". Circulation of such distorted minutes has lowered my image and reputation in the estimation of outside authorities. It goes to my credit that I was the only lady doctor who opted and insisted for stay duty at evening and night instead of a "call duty".

(iii) As regard allegation of so called misbehavior with Dai no such thing ever happened.

In view of above submissions, if desired the entire situation may be brought to notice of competent authority in the Secretariat Peshawar for proper and final adjudication. I am not inclined to receive second warning on the same premise from the office of MS. any more. However an exhaustive position will be explained there if asked for to do so.

With regards,

(Secretariat)

17

Dr. Amina Yousaf

Dr. Amina Yousaf
WMO DHQ HOSPITAL BATTAGRAM

Attended
ALTAF KHAN

Assistant Director
Directorate General Immigration & Passports (HQ)
Islamabad

Dated 21/10/2017

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Handwritten marks and scribbles.

OFFICE OF THE MEDICAL SUPERINTENDENT DHO HOSPITAL BATTAGRAM

Dated: 08.03.2018.

BATTAGRAM
yahoo.com

2018

- 1- Dr. Ihsan Ullah MO, absent on 21.02.2018.
- 2- Dr. Amina Yousif WMO, absent on 21.02.2018.
- 3- Dr. Beenish Raza Gynecologist absent on 21.02.2018.
- 4- Dr. Bushra Fazal Wahab WMO, absent on 21.02.2018.
- 5- Dr. Darmindar Kumar MO, absent on 21.02.2018.
- 6- Dr. Fakhar Zaman MO, absent on 21.02.2018.
- 7- Dr. Ghazala Rasheed Gynecologist, absent on 21.02.2018.
- 8- Dr. Mariam Faiz WMO, absent on 21.02.2018.
- 9- Dr. Nihal Ahmad, MO absent on 21.02.2018.
- 10- Dr. Saeeda Yousif WMO, absent on 21.02.2018.
- 11- Dr. Sagheer Ahmad MO, absent on 21.02.2018.
- 12- Mr. Pir Maab Shah C/N, absent on 07.02.2018.
- 13- Mrs. Shaista Kanwal C/N, absent on 07.02.2018.
14. Miss. Hira Inayat C/N absent on 21.02.2018.
- 15- Mr. Lal Muhammad absent on 06.02.2018 & 21.02.2018 (2 days).
- 16- Mr. Muhammad Ali JCT cardiology absent on 06.02.2018 & 21.02.2018(2 days).
- 17- Miss. Mehvish Bibi absent on 07.02.2018 & 21.02.2018 (2 days)
- 18- Mr. Javid JCT Radiology absent on 07.02.2018 & 21.02.2018 (2 days)
- 19- Mr. Sajid Ali JCT physiotherapy absent on 07.02.2018 & 21.02.2018 (2 days)
- 20- Mr. Muhammad Nadeem JCT Pathology absent on 07.02.2018 & 21.02.2018(2 days).
- 21- Miss. Sobia Naz FMT absent on 07.02.2018.
- 22- Mr. Ghufran Shah JCT Physiotherapy absent on 07.02.2018 & 21.02.2018(2 days).
- 23- Mr. Amjid JCT Pathology absent on 21.02.2018.
- 24- Mr. Baiz Khan Homeo Technician absent on 21.02.2018.
- 25- Mr. Hussan Nabi JCT Pathology absent on 21.02.2018.
- 26- Mr. Majid JCT Anesthesia absent on 21.02.2018.
- 27- Mr. Rafique JCT Anesthesi. absent on 21.02.2018
- 28- Mr. Siraj Udin JCT Radiology absent on 21.02.2018
- 29- Mr. Wazir Ahmad JCT Pathology absent on 21.02.2018.
- 30- Miss. Sadia Bibi FMT absent on 21.02.2018.
- 31- Mr. Niaz J/C absent on 21.02.2018.
- 32- Mr. Maqbool Shah J/C absent on 21.02.2018.
- 33- Mr. Murshid Sweeper absent on 06.02.2018 & 21.02.2018(2 days).
- 34- Mr. Bakht Zada Sweeper absent on 21.02.2018.
- 35- Mr. Bashir Ahmad W/O absent on 21.02.2018.
- 36- Mr. Ijaz Receptionist absent on 21.02.2018.
- 37- Mr. Haq Nawaz Sweeper absent on 21.02.2018.
- 38- Mr. Abdullah Sweeper absent on 21.02.2018.
- 39- Mr. Ibraheem OT Attendant absent on 21.02.2018.
- 40- Mr. Swal Faqeer Plumber absent on 21.02.2018.
- 41- Mr. Sher Ali W/O absent on 21.02.2018.

subject: EXPLANATION.

As per report of the Independent Monitoring Unit (IMU) Health Department, Government of Khyber Pakhtunkhwa Peshawar, you were found absent from your duties places dates mentioned against your name without information or prior sanction of leave. You are hereby directed to explain your position regarding your unauthorized absence & as to why strict disciplinary action should not be initiated against you under E & D rules 2011.

Your reply should reach this office with in three days of issuance of this letter positively without failure. In case of noncompliance within stipulated time or unsatisfactory reply the case will be forwarded to the competent authority for further necessary action.

Medical Superintendent
DHO Hospital Battagram
No & Date even above.

Copy forwarded to the:-

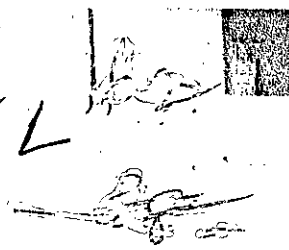
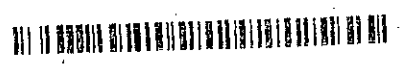
1. Divisional Monitoring Officer Hazara Division Abbottabad for information please.
- 3- Pay branch of this office for information.

Medical Superintendent

Attested
ALTAF KHAN
Assistant Director
Immigration & Passports HQ

18

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To

The M.S
DHQ Hospital
Battagram

Subject: Explanation

Reference memo no 715-55 dated 8-3-2018 received by Dr. Saeeda Yousaf on 10-3-2018 as I was on my evening duty during the week ending 10-3-2018.

I was present on 21-2-2018 and had managed the evening shift on that day till 8 p.m I was stunned to have been issued aforementioned memo without even absence for few minutes from the floor. The fallacy of the absence report is evident from the fact that all six doctors of Gynae unit have been issued memo and no hue or cry from the general public has been reported. There is no grain of truth in this report and ought to have not been acted upon. Before the issuance of this memo to all female doctors of the gynae unit this aspect together with their duty roster ought to have been given consideration. It will be adviseable if in future the wheat is separated from the chaff and no action is taken on such misleading reports for the sake of dignity of the doctors. The IMU therefore themselves owes explanation for such wrong reports.

It is requested that a transcript of IMU report along with the names of the reporting members of the team be supplied to me for record.

Dated, 12.03.2018

Attested
ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports HQ
Islamabad

[Signature]
Dr. Amina Yousaf
12/3/18

19

37 - M



DEPUTY COMMISSIONER BATTAGRAM
(Khyber Pakhtunkhwa)

Deputy Commissioner Battagram

dc.battagram@gmail.com

0997-310136

0997310051



No. 1433 /PS:

Dated: 14 / 06 /2018

To:

✓
The Medical Superintendent,
DHQ Hospital Battagram,
Battagram

Subject

DISCIPLINARY PROCEEDING AGAINST Dr. AMINA, WMO DHQ HOSPITAL BATTAGRAM

Memo

As in your knowledge a mishap incident happened yesterday between two groups at village Kotpalla resulting in loss of four precious lives including a woman.

The dead bodies were brought in to DHQ Hospital Battagram at around 07:00 PM. Assistant Commissioner Battagram rushed to the hospital accompanied by DSPs who remain present over there till 10:00PM

It is noted and conveyed with great concern that for post mortem of the dead body of lady, when the lady doctor on duty Dr. Amina was contacted on phone time and again she refused to attend outrightly which is purely non professional and unbecoming attitude on her part and falls in the category of misconduct as defined under Khyber Pakhtunkhwa E&D Rules 2011

Such an irresponsible and casual attitude might lead to law & order situation for District Administration.

Therefore, an inquiry in this regard be initiated against her under the rules quoted above and be forwarded to Director General of Health Services Peshawar with a copy to Secretary Health Govt. of Khyber Pakhtunkhwa under intimation to this office.

[Signature]
Deputy Commissioner,
Battagram

No

Copy forwarded to the Secretary to Commissioner Hazara Division Abbottabad.

[Signature]
ALTAN KHAN
Assistant Director
Directorate General Administration & Passports (HQ)

[Signature]
Deputy Commissioner,
Battagram

20

جانان

شکرت

112

دفت وزارت 13/78 دفت سندھ دہلا

13/78 دفت 19/11/5 دفت 13/78 دفت 20/145

سید عیاش ولد سرتان نوم سرتان سکندر سکندر
ریزید نمبر 302/324/1052/1108/1149

خانہ نمبر 65/66 سال 65/66 سال 65/66 سال 65/66 سال

سندھ کی سرکار سندھ دہلا

سکونت محل الہ آباد

دفت وزارت 13/78 دفت سندھ دہلا

1140 شمارہ 13/78 دفت 19/11/5 دفت 13/78 دفت 20/145

سید عیاش ولد سرتان نوم سرتان سکندر سکندر
ریزید نمبر 302/324/1052/1108/1149

خانہ نمبر 65/66 سال 65/66 سال 65/66 سال 65/66 سال

سندھ کی سرکار سندھ دہلا

سکونت محل الہ آباد

دفت وزارت 13/78 دفت سندھ دہلا

1140 شمارہ 13/78 دفت 19/11/5 دفت 13/78 دفت 20/145

سید عیاش ولد سرتان نوم سرتان سکندر سکندر
ریزید نمبر 302/324/1052/1108/1149

ALTAF HIAIU
Assistant Director
Directorate General Immigration & Passports (Hq)
Islamabad

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P-11

Written statement

P-11
39

1.

- i. As has been explained in my appeal addressed to secretary health department, my sin is that I am the first ever local resident WMO posted to DHQ Battagram. The acting M.S Muhammad Rahim who has established private hospital under his own name "Al Rahim general and surgical hospital" within prohibited limits of 500 meters considered my appointment as potential threat to his business. Being acting M.S of DHQ he has adopted polices beneficial to his business.
- ii. From day 1st he created reign of terror and started vilification campaign against me. He debarred incharge Gynae and obs unit from opening new OPD vide order No 36660-62 Dated 27-09-2017 (Enc I. -I). In contrast he allowed new OPD for his sister in law Dr Sobia at the time of her appointment in March 2018 (Encl - II) she was given an independent room while I had to request Dr Bushra for sharing her room. He also managed a Dai for her.(Encl - III).
- iii. It is the norms of civility, decency, courtesy and etiquette that leniency is shown in matters of minor/ aberration to the new entrants to enable them to groom. At the most "counseling" are given for the breach of first discipline and the harsh action of issuing 1st and last warning is avoided. Hardly serving for 15 days that he started terrorizing me in the from of issuing explanations and warnings on trifles and giving it wide publicity.
- iv. A problem with regard to duty roster had cropped up and the same was amicably resolved as is evident from the minutes of the meeting Dated 11-10-2017 (Annexure - L) and text message recorded in para 7 of the appeal. However the acting M.S very maliciously circulated distorted facts recorded in the minutes to the outside authorities to malign and damage my reputation. He also issued explanations dt 11-10-2017 (Annexure -C) followed by warning dt 16-10-2017 on the same very issue which already stood resolved. The warning was issued on the ground that no timely complaint or reservations were given to him. Such a plea of the acting M.S

17/11/18

Attested



ALTAF KHAN

Directorate General
of Health Services
Battagram

41
is not based on facts. The reservations were duly communicated on 10-10-2017 (Annexure – F). In order to circumvent the events and bringing the same in line with his predetermined wishes, he kept this application with him, diarized it on 12-10-2017 and recorded note on the top of it on 16-10-2017. He also ignored the note of unit in charge (Annexure –G) in this regard. He made mountain out of molehill and issued explanation dt 17-10-2017 (Annexure –H) on the same very matter. My explanation to the same may please be seen at (Annexure –J).

- v. As regard warning dt 03-11-2017 the same has not been delivered to me and I am unaware of its contents. Hence no comments in this regard.
- vi. He viciously included my name in the memo dt 08-03-2018 (Annexure – k) while I had duly performed my evening duty on that day. My demand (Annexure –L) for supply of a transcript of IMU report was swept under the carpet.
- vii. The stay duty at evening shift and night shift was initiated for the first in the history of DHQ on my insistence. This arrangement was hailed by general public and accordingly the unit in charge issued an appreciation letter (Encl –IV) to me. The acting M.S was not happy with this arrangement for obvious reasons of financial loss to his hospital business.

2.

As regard the autopsy of female dead body, the following points / contradictions are note worthy.

- i. The time of arrival of female dead body has been shown as 7.45 pm in the police report (Annexure -I). At the time of arrival of female dead body the autopsy of a male dead body of adverse party (Mr Aziz ur Rehman) was undergoing which was completed at about 8 pm. Thereafter autopsy of 2 male bodies of the family of female dead body was started. The autopsy of male dead bodies is stated to have been completed at about 9 pm. By no stretch of imagination I am supposed to initiate the autopsy of female dead body during my duty period upto 8 pm.


Attested
AITAF KHAN
Assistant Director
Directorate General Immigration & Passports (HQ)
Directorate General Immigration & Passports (HQ)

2

42

- ii. As has been explained above, the time of arrival of female dead body is 7.45 pm. According to protocol police papers are precondition for autopsy. The police papers were prepared in DHQ after 7.45 pm. How is it possible to record the statements of the heirs of three dead bodies and prepare death report within short span of my left over 15 minutes duty.
- iii. The moot point for determination in this episode is the timing of refusal of female autopsy. If for the sake of discussion It is admitted that the female dead body was prepared within 15 minutes of my duty, then the following points need investigation.
 - a. Whether I have been informed before 8 pm telephonically or in writing of the female autopsy.
 - b. Is there exists 2nd and separate mortuary for autopsy of female dead body as the only one mortuary was engaged in autopsy of male dead bodies up to 9 pm.
 - c. If the replies to the above is in negative, then my refusal of autopsy during the duty period of Dr Sobia has no significance. Why Dr Sobia the sister in- law of acting M.S was not asked to do the needful and why she has not been asked to explain her conduct and late coming. She performed autopsy (Encl – V) at 10 pm due to late arrival. Had she been at the place of her duty at 8 pm the alleged gathering of mob and law and order situation would have been averted.
- iv. The statements of A.C and DSP (Encl – VI & VII) contain some cutting about the arrival of dead bodies and creates serious doubts about their authenticity. They need to be cross examined before the inquiry officer. They need questioning on the point as to why they did not contact Dr Sobia and implicated me in the case.
- v. At about 8.20pm a caller from telephone No 923479727873 who introduced him self as SHO about the autopsy of female dead body when I had just reached home after my duty period. I asked him to inform the doctor who is supposed to be on duty w.e.f 8 pm to 8 am. Thereafter Dr Rafiullah (telephone No 923459620055) and Dr Muhammad Rahim (telephone No 923339198953) contacted me for the first time at about 8.44 pm and 9.36

17/7/20


ALTAFKHAN
 Assistant Director
 Directorate General of Immigration & Passports (HQ)

- 43 -

pm respectively. These were the first official telephonic contacts. I asked them why DR Sobia is not being asked to do the needful. At this Dr Muhammad Rahim threatened me " No need to come to hospital tomorrow and report to D.G at Peshawar" The details of telephonic calls is attached (Encl - VIII). Next day when I came for duty, the relieving letter was handed over to me.

- vi. The acting M.S has given wide publicity to the minutes of meeting held in 11-10-2017 as well as to warnings and relieving through whatsapp/ facebook/ social media/ print media. The relieving order was also displayed on the public notice board of the DHQ (Encl - IX). Even the stoppage of pay has also been given publicity (Encl - X). He made viral the video of my alleged leaving hospital with his comments. This is nothing but manifestation of sick mind. I am considering filing of libel and defamation case before competent forums.
- vii. Sir, as you are aware issuing warning is semi juridical in nature and can be issued by an authority holding higher post or by an authority specifically empowered in this behalf by the competent authority. As for as I understand Muhammad Rahim was not holding the higher post of M.S on current charge basis/ additional charge basis or acting charge basis duly notified by the competent authority. He was merely looking after the duties of M.S as a stop gap arrangement to carry out routine day to day business. If my this assumption is correct, then he is misusing the designation of M.S in official communications.
- viii. Despite the humiliating attitude of Muhammad Rahim I continued to serve without bringing this to the notice of higher authorities with a hope that better sense would prevail some day. It was beyond my imagination that he will stoop to such level of favoritism, nepotism and depravity and use such a dreadful incident in pursuit of his revenge and personal vendetta. By no yardstick he is capable to hold the administrative post of management cadre for which he is not even qualified.

3.

Attached
ALTAF KHAN
Assistant Director
Directorate General
Peshawar

4

The following allegations leveled by me against the acting M.S need
interrogation and investigation.

- i. The acting M.S is administrating the affairs of his private hospital side by side with DHQ which is "conflict of interest case"
- ii. He is enrolled under registration No 2017 / KMU/ IPHSS/ ^{MPH} NPH/ SS /25 spring 2017 at KMU Peshawar and taking regular classes from Monday to Thursday. He has appeared in the 1st semester examination under Roll No 61023.
- iii. He is also in possession of passport no PK 4125731 obtained in private capacity. He is using this passport incognito for trips to foreign countries without NOC and EX Pakistan leave. The detail of his foreign trips is as under.
 - a. Departure through flight no Pk 731 from Karachi on 09-09-2015 and return through flight no PK 736 at Islamabad on 28-10-2015.
 - b. Departure through flight no EY 234 from Islamabad on 29-09-2016 and return through flight no EY 231 at Islamabad on 05-10-2016.
 - c. Departure through flight no Ek 637 from Peshawar on 20-12-2016 and return through flight no NL 757 on 24-12-2016 at Peshawar.

As per "voice populi" these visits have been sponsored by pharmaceutical companies.

- iv. The above acts of commissions / omissions constitute "Misconduct" under E & D Rules and are also cognizable offences under sections 419, 420, 468, 471 PPC read with section 5 of anti corruption act 1947 and passport act 1974. The matter may please be referred to FIA/Anti corruption establishment.

Attested
ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports (HO)
Islamabad.

Dr. Amir Yousaf
17/7/2
SQA B-1/2

5



45
Enclosure (I)

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No: 0997-311518 Email Address:
Casualty Dept Phone No: 0997-310018 Fax No:

dhqbt511@yahoo.com
0997-311518

No. 3660-62 / Office Order dated 27-09-2017

OFFICE ORDER

Consequent upon the arrival of Dr. Amina Yousif, Women Medical Officer BS-17, her services are given at the disposal of Incharge Gynae Unit with immediate effect. Incharge Gynae Unit is directed not to start any new independent OPD for WMOs. She is further directed to prepare a new duty roster of all WMOs for smooth running of the Gynae Unit. All WMOs should be given equal rotation in OPD, Labor Room & MIC cases.

Sd/-

Medical Superintendent
DHQ Hospital Battagram

No & date event above

Copy forwarded to the:

- 1- Incharge Gynae Unit for information
- 2- Dr. Amina Yousif WMO, for information.
- 3- All the doctors of Gynae Unit for information.

[Signature]
Medical Superintendent
DHQ Hospital Battagram

[Signature]
ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports (HD)



- 3146 Enclosure (II) -

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address;
Casualty Dept Phone No, 0997-310018 Fax No,

dhqbtg518@yahoo.com
0997-311518

No, 968-69 /Office Order dated 24.03.2018

OFFICE ORDER.

Consequent upon arrival of Dr. Sobia Riaz WMO DHQ Hospital Battagram, her services are hereby given at the disposal of HOD Gynae in the best interest of public service with immediate effect.

Incharge Gynae is directed to assign her duties as per rules & regulation.

Sd x x x

**Medical Superintendent
DHQ Hospital Battagram**

No & date given above:-

Copy forwarded to the:-

- 1-Incharge Gynae Unit for information.
- 2-Dr. Sobia Riaz WMO for information.

Jes
**Medical Superintendent
DHQ Hospital Battagram**

Attested
ALTAFKHAN
Assistant Director
Directorate General Immigration & Passports - III

47 320

Enclosure (III) *Q*



OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM

MS Office Phone No. 0997-311518 Email Address; dhqbtg518@yahoo.com
Casualty Dept Phone No, 0997-310018 Fax No, 0997-311518

No, 1107-09 / Office Order dated, 11.04.2018

OFFICE ORDER.

Mrs. Niaz Bibi Dai is hereby directed to perform her duty in Gynae OPD with Dr. Sobia Bibi WMO, with immediate effect in the best of public interest.

d x x x

**Medical Superintendent
DHQ Hospital Battagram**

No & date even above:-

Copy forwarded to the;-

- 1- Incharge Gynae unit for information.
- 2- Supervisor Class IV staff for information.
- 3- Concerned staff for information.

Approved

**Medical Superintendent
DHQ Hospital Battagram**

Attested:
ALTAH KHAN

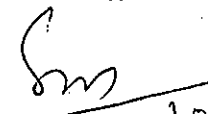
Assistant Director
Immigration & Passports-HQ
Islamabad


48

Enclosure IV

Certificate of appreciation

It give me immense pleasure and satisfaction as a head of Gyne&Obs Department that for first time since the establishment of DHQ Battagram 'stay duty' at evening shift and night shift has been started w.e.f 17-10-2017. Prior to this due to shortage of female doctors, emergent situations were met through "call duty" basis. This new arrangement was made possible on the insistence of DR: Amina Yousaf who is local resident and has voluntarily opted for it. Dr Amina Yousaf has completed four years FCPS training at Polyclinic Islamabad and is quite competent to conduct all procedures. I am sure she will use this additional qualification for the benefit of ailing humanity. This new arrangement has enhanced the efficiency and capacity of the DHQ and has also provided much relief to the poor patients and has very salutary effects on the working of DHQ. On account of this volunteer selfless service, I pray for success in her carrier in this noble profession.


10.11.17
DR Ghazala Rasheed
HOD Gyne&Obs
DHQ Battagram

Attested

ALTAF KHAN
Assistant Director
General Hospital - Battagram
Telephone: 0992-30101

Medical 4b

Yearly No.

49
HINDI AND SPINA

14.03.18

NAME: <u>Lattoon Bibi</u>							
FATHER'S NAME OR HUSBAND'S NAME: <u>Abdul lateef</u>							
Caste: <u>Swati</u>							
RESIDENCE: <u>Sakra Kot Gala</u>							
SEX: <u>Female</u>	AGE: <u>About 50</u>						
DISTRICT: <u>Battagram</u>							
Body brought by: <u>Police</u>							
Body identified by: <u>320248185675</u>							
Whence brought: Village, Thana, District	<u>7:45pm at 13/6/2018 village Kot Gala Thana Chanjal District Battagram</u>						
DATE AND HOUR OF _____							
Death:	<table border="1"> <tr> <td>Examination of body</td> <td>Despatch of matter to Chemical Examination</td> </tr> <tr> <td><u>10:00pm</u></td> <td><u>Nil</u></td> </tr> <tr> <td><u>13-6-2018</u></td> <td></td> </tr> </table>	Examination of body	Despatch of matter to Chemical Examination	<u>10:00pm</u>	<u>Nil</u>	<u>13-6-2018</u>	
Examination of body	Despatch of matter to Chemical Examination						
<u>10:00pm</u>	<u>Nil</u>						
<u>13-6-2018</u>							
Symptoms observed before death:	<u>Nil</u>						
Information furnished by Police:	<u>FAI</u>						

N.B. — The Medical Officer will observe the state of all the agress, and when he finds no disease or injury, he should write in the appropriate place the word "Healthy"

I. EXTERNAL APPEARANCE

Mark of ligature on neck and dissection, etc.	<u>NO mark of ligature noted (multicolor)</u>
Condition of subject stout emaciated, decomposed etc., Clothing	<u>Old age lady about 50yrs wearing shirt printed with white shalwar half.</u>
Wounds, bruises, position, size, nature.	<p>Postmortem staining delivelped Rigor mortis was partially delivelped Description of wounds</p> <p>① Entry wound. 0.5cm wound (FAI) with inverted margin on the top of lf shoulder</p> <p>② Exit wound: A 2cm FAI wound with everted margin present on the left side of Back Just below left scapula</p> <p>③ 1cm FAI wound on Lt side</p>

Altamash
Assistant Director
Directorate General Immigration & Passports
Islamabad

50

Handwritten Urdu text, likely a letter or report, covering the majority of the page. It appears to be a request or report related to administrative or immigration matters.

① ڈائری آفیسر A-1

② DSP

Office establishment
to relieve Dr. Amrta
on administrative grounds.

Received
15/6/18
Dr. AHO, the Spinal
Rathay

14/06/2018

ALTAKHAN
Assistant Director
Directorate General Immigration & Passport-HH
Islamabad

صا علی

گزارش آج مورخ 13/6/18

لقمہ بنا (بند واقع دہم) میں ٹھکانا جس سے دیکھ کر ایک خاتون کی ہوا تک جاتی رہی

میں تمام دفعات کی مشاہدہ 13/6/18

دوسرا واقعہ وار سٹیشن 12/6/18

خاتون سماں زمینوں میں دو مشاہدہ کے ساتھ ایک کورنگ جس میں بچوں کو لٹکا دیا گیا

اسی طرح کے اور کئی سرچور اور ایڈیشنل

صاحب سید کے اور آخر میں جنس کی بھی ہے

2 بجے کوئی کام میں جھگڑا

MS صلہ اور مقررہ رابطہ کاروں میں

DMs کے ساتھ اس کے بارے میں جان آ رہی ہے

کوتلہ رفیقہ سے بات کرنا

کوتلہ رفیقہ کے بارے میں اور A کے بارے میں

خاتون کی پتھر میں تیار ہار کے بارے میں

تو قون کے حیرت سے انہی اہلکاروں کے پاس

اور انہی کے ذریعے سے انکار کیا گیا

A کے بارے میں اور A کے بارے میں

13/6/18

Received

Dr. Rafiqullah
D.H. Khan
B.M.M.

Attested

17/6/18

Placed in
Administrative records

ALTY KHAN

Assistant Director
Directorate General Immigration & Passports (H.I.)
Islamabad

is established to
either of them
for P.H.O.
Administrative records

27/52

Enclosure VIII

123

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HOL
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Altaf Khan
ALTAF KHAN
 Assistant Director
 Directorate General Immigration & Passport - H-1
 Islamabad

Enclosure FX

No. 1111 of 1111 - Under date of 11/11/11

11/11/11

Very truly yours,
[Faint signature]

Handwritten mark

State of Michigan
1111 Hospital Unit
[Faint text]

Copy forwarded to the
Director of [Faint text]

Handwritten signature
ALTAIRAS

11/11/11

Better copy

- 54 -

Encl. TX

OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL BATTAGRAM.

MS Office Phone No. 0997-311518

Email: dhqbtg518@yahoo.com

Casualty Department Dept. Phone No.0997-310018

Fax: 0997-311518

No._1881-84/Office Order dated 19.06.2018

OFFICE ORDER

In the wake of the fact that Dr. Amna Yousaf, Women Medical Officer has been relieved from DHQ Hospital Battagram on administrative grounds vide this office letter No.1869-79 dated 14-06-2018 Incharge.


Obs & Gynae unit is hereby directed to prepare new duty rosters of WMOs today as per rules in the best public interest with immediate effect. Duty roaster should reach to this office before 1 PM positively.

Medical Superintendents
DHQ Hospital Battagram
No and dated even above.

Copy forwarded to the:-

- 1 Dr.Ghazala Rasheed, Incharge Gynae unit DHQ hospital Battagram for information and necessary action please
- 2 Casualty Incharge for information
- 3 All other WMOs for information and compliance
- 4 ✓ Copy to notice board

Medical Superintendents
DHQ Hospital Battagram


AL TAF KHAN
Assistant Director
Superintendent General Immigration & Passports (HQ)
Lahore

Enclosure X



**PAYABLE SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY**

Form PAY02

313

Date: _____

Page No: _____

OFFICE OF THE Medical Superintendent DHO Hospital Battaaram

FOR THE MONTH OF June 2018

DDO CODE :

B	M	7	0	0	5
---	---	---	---	---	---

 Description
(Cost Center) Medical Superintendent DHO Hospital Battaaram

Personnel Number :

0	0	6	4	8	5	1	1
---	---	---	---	---	---	---	---

 Employee Name DR AMINA YOUSAF

National ID : _____

Card No : _____

Grade (Pay Scale Group)

1	7
---	---

WOMEN MEDICAL OFFICER

Tilary Status:

GENERAL DATA CHANGE 17			CHANGE IN PAYMENTS/DEDUCTIONS 17				Effective Date 21	Remarks 22	
Info Type	Field ID 18	New Contents 18	Wage Type 19	Amount in Adjustment Allowances					
				Rupees	Paisa	Adj 23			
			Regular	Head Acc	one month & 24 days	Total Adjust			
			1	2	3	4			
								6/3/2018	The Women Medical officer has been on administrative ground due to refuse to comply with this office Letter No. 1862-T2 DHO/10/18 dt 13.05.2018 therefore her salary may be paid with immediate effect to her.
								to	
								to 30/04/2018	

Stop-pay

Stop pay under the Ord 2011 relived from DHO Hospital Battaaram to Health Department KPK Peshawar

Prepared By: _____

Control Checked By: _____

Attested
ALTAF KHAN
Assistant Director
Directorate General Immigration & Passports - AF
Peshawar

P-12

56

P-12

To

The Secretary
Health Department
Govt of KPK
Peshawar

Subject: Reporting For Duty.

Respected sir,

It is brought to your kind notice that vide acting M.S DHQ Battagram letter no. 1865-79 Doctor dt 14-6-2018 addressed to your good self and a copy thereof endorsed to me, I have been relieved of my duty with stoppage of pay at DHQ Battagram and directed to report at Peshawar. To save his sister in law Dr:Sobia to perform the autopsy of female dead body and to protect economic interests of his private hospital established within prohibited limits of 500 meters, Dr:Muhammad Rahim the acting M.S has falsely involved me in refusal of autopsy thereby getting rid of me through fabrication and manipulation. A detailed appeal dated 20-06-2018 has already been submitted to your goodself in this regard.

It is requested that till finalization of inquiry. I may please be allowed to continue at DHQ Battagram as my husband is Federal Government employee and presently posted as Engineer in Kohat in Pakistan Railway. It is impossible for me to live all alone at Peshawar with four little kids, the elder one is 7 years old.

Yours obediently


DR: Amina Yousaf

Village Maidan P/O Tehsil & District
Battagram

Cell no# 0334-9165002

Attested

ALTAM KHAN
Assistant Director
Directorate General Immigration & Passports
Peshawar

Dated: 25-6-2018



4-57 P-13
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the June 25, 2018

NOTIFICATION.

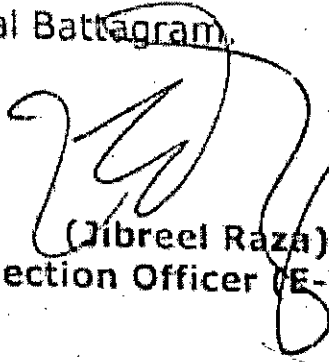
No.PA to DS-1/1-1/2018 The Competent Authority is pleased to appoint Dr. Muhammad Naeem Awan, Medical Superintendent Mental & General Hospital Dadar Mansehra to conduct a fact finding enquiry regarding relieving of Dr. Amina Yousaf, WMO BS-17 from DHQ Hospital Battagram in light of the report of MS DHQ Hospital Battagram vide Letter No.1869-79/Doctor dated 14.06.2018 and application of the doctor concerned dated 25.06.2018 (copies attached) and submit report within 07-days positively.


SECRETARY
HEALTH DEPARTMENT

Endst. No. and dated even.

Copy to the:

1. Dr. Muhammad Naeem Awan, Medical Superintendent Mental & General Hospital Dadar Mansehra.
2. MS DHQ Hospital Battagram.
3. Dr. Amina Yousaf, WMO BS-17. DHQ Hospital Battagram.
4. PS to Secretary Health Department.
5. PA to Additional Secretary (E&A) Health Deptt.


(Jibreel Raza)
Section Officer (E-II)

Attched.

ALTAFXHAN
Assistant Director
General Immigration & Passports, HQ
Islamabad



58 P-14
GOVERNMENT MENTAL & GENERAL HOSPITAL
DADAR MANSEHRA

Contact No: 0092 315522073 email: msgmhdadar@yahoo.com

NO. _____ / Enquiry.
Dated 13 /07/2018.

To,

The Medical Superintendent,
D.H.Q. Hospital Battagram.


Subject:-
Memo:

ENQUIRY.

Reference Health Department letter No. PA2 DS-1/1-1/2018 dated 25-6-2018.

I am being nominated as enquiry officer to conduct fact-finding enquiry regarding relieving of Dr. Amina Yousaf W.M.O BPS-17 from D.H.Q. Hospital Battagram by acting Medical Superintendent D.H.Q Hospital Battagram and application of doctor concerned dated 25-6-2018.

In this connection the undersigned will visit D.H.Q Hospital Battagram on 16-7-2018 at 2.30PM. You are directed to inform Dr. Rahim acting M.S, C.M.O on duty on that incident day, complaint W.M.O Dr. Amina Yousaf with all relevant record.


Medical Superintendent.


Govt: Mental & General Hospital,
Dadar Mansehra,

NO. 355-57 /


Copy forwarded to the

1. The P.S Secretary to Govt: of Khyber Pakhtunkhwa Health Deptt: Peshawar.
2. The P.A to Additional Secretary to Govt: of Khyber Pakhtunkhwa (E&A) Health Deptt: Peshawar.
3. Dr. Amina Yousofr W.M.O. DHQ Hospital Battagram.

For information please.


Medical Superintendent.

Govt: Mental & General Hospital,
Dadar Mansehra,


ALTAM KHAN
Assistant Director
Directorate General Immigration & Passports
Islamabad

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 44

Dated 8-1-2019

To,

The Registrar,
KPK Service Tribunal,
Peshawar.

Subject: APPEAL NO. 1343/2018 DR AMINA YOUSAF VS HEALTH
DEPARTMENT.

Dear Sir,

The Impugned order dated 13-06-2018 has been withdrawn by the Department. Consequently the titled petition is withdrawn with a right to revival of appeal if fresh cause of action arose in this regard. The Tribunal may however issue direction with regard to conduct of departmental inquiry on the allegations of corrupt practices, misuse of official authority, favoritisms and nepotism alleged in the appeal.

Yours obediently,



Dr. Amina Yousaf
House no.243, St no. 84
G-11/3 Islamabad.

Put up to the court with relevant
appeal.

Reader


8/1/19.

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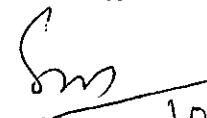
- 59 - 85 -

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Enclosure IV

Certificate of appreciation

It give me immense pleasure and satisfaction as a head of Gyne&Obs Department that for first time since the establishment of DHQ Battagram 'stay duty' at evening shift and night shift has been started w.e.f 17-10-2017. Prior to this due to shortage of female doctors, emergent situations were met through "call duty" basis. This new arrangement was made possible on the insistence of DR: Amina Yousaf who is local resident and has voluntarily opted for it. Dr Amina Yousaf has completed four years FCPS training at Polyclinic Islamabad and is quite competent to conduct all procedures. I am sure she will use this additional qualification for the benefit of ailing humanity. This new arrangement has enhanced the efficiency and capacity of the DHQ and has also provided much relief to the poor patients and has very salutary effects on the working of DHQ. On account of this volunteer selfless service, I pray for success in her carrier in this noble profession.


10.11.17
DR Ghazala Rasheed
HOD Gyne&Obs
DHQ Battagram

Attested
ALTAR KHAN
Assistant Director
Directorate General Immigration & Passports
Islamabad